



Australian Institute of Architects

ACT Chapter

Response to the
Inquiry Into RZ3 &
RZ4 Residential
Development Policies
– Inner North
Canberra

Submission made to:

*Legislative Assembly
of the Australian
Capital Territory
Standing Committee
on Planning, Public
Works and Territory
and Municipal*

SUBMISSION BY

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PURPOSE

- This submission is made by the Australian Institute of Architects (Institute) to the Standing Committee on Planning, Public Works and Territory and Municipal Services of the ACT Legislative Assembly
- This submission has been prepared with the assistance of the ACT Chapter Planning and Heritage Committees.
- At the time of this submission the ACT Chapter President of the Institute is David Flannery
- The ACT Chapter Manager is Sophie Clement

INFORMATION

Who is making this submission?

- The Australian Institute of Architects (the Institute) is an independent voluntary subscription-based member organization with approximately 9,450 members, of which 6,070 are architect members. Members are bound by a Code of Conduct and Disciplinary Procedures.
- The Institute, incorporated in 1929, is one of the 96 member associations of the International Union of Architects (UIA) and is represented on the International Practice Commission.

Where does the Institute rank as a professional association?

- At approximately 9,450 members, the Institute represents the largest group of non-engineer design professionals in Australia.



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RESPONSE TO THE INQUIRY INTO RZ3 & RZ4 RESIDENTIAL DEVELOPMENT POLICIES – INNER NORTH CANBERRA

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Introduction

Northbourne Avenue is a main approach road into the Canberra CBD and Parliamentary Zone from the north. As such it has been the site of a number of significant early developments undertaken to establish a presence for the city as travellers arrived from the north in the early stages of development. Its role is increasingly important as both a major avenue linking the inner north and outer northern suburbs to the CBD most directly and in its ongoing role as the entry way to the city. In both roles increased density of development supporting good levels of service provision, local businesses and employment and a liveliness of character would be a positive outcome.

The basic strategy of focussing density on the avenue and transitioning to areas of relatively lower density within a relatively short distance supports diversity of choices within the inner north. It also provides the basis of support for high utilisation of community facilities and cost effective provision of support networks into the community.

Thoughtful strategic intensification of development can provide significant gains in sustainability where the physical development ties to capacity for change in behaviour and lifestyle.

Northbourne Avenue's civic value continues to develop and in determining the future character of the area and the long term objectives for the city the heritage value of the buildings listing on the Institute's heritage registers should be considered.

Submission Preparation Process

The preparation of this submission was led by the Australian Institute of Architects' (Institute) ACT Chapter Planning Committee with advice on heritage matters affecting the study area provided by the ACT Chapter Heritage Committee. The response is informed by the Institute's Urban Design, Environmental and Heritage Policies.

During 2009 the ACT Chapter of the Institute undertook the Sustainable Cities Fora, a series of presentations on the issues affecting the long term sustainability of Australian cities with a particular focus on considering how these could be addressed in Canberra. Presentations were made by researchers from CSIRO and a number of universities, as well as design practitioners.

From this the Draft Design Brief for a Sustainable Canberra in the 21st Century (see attachment A) was developed. The presentations at the Fora and the subsequent workshops and discussion have also inform this submission.

The Chapter Planning committee also considered documents including, but not limited to, the "North Canberra RZ3 and RZ4 Residential Development Policy Monitoring and Evaluation November 2008", relevant sections of the ACT Territory Plan and related documents, the "ACT Strategic Public Transport Network Plan For Discussion" June 2009 and submissions by affected residents highlighting impacts of the moratoria and other matters.

Response to the Terms of Reference

The Terms of Reference of the Inquiry are as set out below:

1. Merits of Maintaining:

(a) the policies applying to RZ4 areas north of Macarthur and Wakefield Avenues which limit development to a maximum 2 storey building height and maximum plot ratio of 0.65 until 23.5 Ha of the 25.9Ha south of Macarthur and Wakefield Avenues and north of Cooyong and Donaldson Street have been developed for multi- dwelling housing; and

(b) the moratorium on development in Turner Section 47 and Part 63.

2. Whether similar redevelopment policies should be extended to other areas surrounding Northbourne Avenue in North Canberra and if so where and at what density.

3. Higher Density Development Along Major Transport Corridors

4. The demand for higher density development, infrastructure capacity of transport and hydraulic networks to absorb additional development, the implications for housing affordability, the extent to which development policies reduce overall travel, the potential impacts of the policies on the amenity enjoyed by residents of areas affected and how such impacts could be ameliorated

5. Other relevant matters

Item 1 Restrictions and Moratoria on Development

The Institute recommends that the restriction on development north of Macarthur and Wakefield Avenues be lifted. If the long term objective is to increase density along the major transport route which the Institute strongly supports, then it should be done now at the highest and best use.

The policy as currently existing simply promotes development at a less than highest value use potentially compromising the opportunity to develop at a higher density long into the future particularly where the development takes the form of multi unit two storey. This has negative impacts on sustainable development for two reasons; firstly the density of population to support the public transport route is reduced, and secondly if the buildings are redeveloped in the medium term there is a cost in wastage of resources through demolition and rebuilding. A requirement for higher density development should be design excellence in terms of the urban and living environment created and the energy / water/ materials efficiency of the buildings, with built fabric designed to last.

This provision potentially just exacerbates the time lag in development of the area from implementation of the RZ4 zoning as investors buy and hold land for future development with no incentive to maintain property and generating a high proportion of transient residents in rental properties. The value of the property becomes the value of the land for redevelopment rather than the land and residence and the lesser development potential reduces the return to residents wanting to move to alternate locations and their resultant capacity to buy an equivalent property. Evidence of this process is provided in the submission from Barnes / Abarbanel.

The ACT Strategic Public Transport Network Plan for Discussion" clearly identifies Northbourne Avenue and the route between Civic and Gungahlin Town Centre as a Rapid & Stop and Frequent Local Service. Integrated planning of transport networks and land use is essential and it is important that the planning controls for this area reflect the proposed increase in public transport provision. The Institute recommends that, with the raising of the limitations on development north of Wakefield and Macarthur Avenues, the rapid stop service along Northbourne Avenue should be implemented. Combined with increased parking charges in the city, increased percentage of short stay parking to support business customers and protection of the nearby suburban areas, consideration should be given to a park and ride facility at EPIC during week days to enable commuters to park more cheaply and use the rapid transit buses. Quarterly and annual bus or park and ride passes should be considered to encourage patronage.

This area is also strategically located to take advantage of a number of key elements to support a rich mix of development and strong community structure.

- The Sullivan's Creek tributary flowing from to Mt Ainslie defines the western edge of the precinct providing the potential for high quality open space to supplement private open space within developments.
- The trunk cycle path running through this area along the creek line provides easy cycle commuter and walking access to the ANU, Civic and Dickson particularly important for with regard to provision of affordable rental accommodation suitable for students, among others.
- Ease of access to a range of retail , sporting, community services, educational institutions and employment locally

The Institute also recommends review of the RZ4 and RZ3 policies – particularly with regard to envelope and setbacks - to enable smaller scale densification with limited amalgamation. This can also possibly provide a finer grain to the urban environment at the denser development levels.

Moratorium on Section 47 and Part 63

The discussion paper proffered by the Committee indicates that the moratoria on these sections are a response to lobbying by existing residents at the time to exclude their areas from development based on a high percentage of residents having no intention of selling for redevelopment. The issue here is that, in any area where the majority of existing residents don't wish sell, development will be gradual

and limited in scope. This will affect the rate of change in the localities noted. Whether the current intentions of existing residents should be the basis for determining planning policy is debatable.

The objective of densification is to reduce urban sprawl, capitalise on the existing infrastructure, increase opportunities to live in close proximity to the retail, recreational, educational, employment and social facilities and improve the energy efficiency of the city. The resident concerns highlight the need to have residential codes for denser development which can support fine grained densification, such that a street character, in which individual houses still have an appropriate scale and amenity, is achieved. This indicates that a moratorium is not necessarily required.

The benefit of the existing streets in the inner north of the city, particularly where there is a strong street tree character, is the ability to maintain much of the existing character and amenity of the public realm while increasing the density of development.

Item 2 Other Developments

The Institute supports consideration of a range of sites that enable and increase in density of development balanced with retention of the single house, semi detached and dual occupancy housing within suburbs. This will ensure housing choice is well distributed and a variety of households can be accommodated.

The Institute submits that locations suitable for consideration for expansion of the RZ3 zone and possibly some RZ4 contiguous to the currently defined precinct could be the blocks on Lyneham Section 41 facing Mouat Street and the sports ovals, and Sections 34, 44, 41 and 51 and facing the slip road along Northbourne Avenue and the rapid bus route and sites opposite out to EPIC.

Other avenues within the inner north that have been put forward for densification include Constitution Avenue. There are significant developments currently in the planning stages along this avenue that a recommitment to the upgrade of the Avenue to a dual carriage boulevard and extension of a rapid / frequent service bus route along it linking the CBD with Russell defence precinct.

Item 3 Higher Density Along Major Transport Corridors

The Institute strongly supports the provision of higher density development along transport corridors as a key element of a strategy for increasing the population density (residential and worker) to support provision of public transport infrastructure and usage of existing infrastructure. The Institute contends this must be done in conjunction with the provision of frequent public transport services and a commitment to develop and maintain a high quality public realm

Some issues attend development on transport corridors for example

- Traffic noise affecting use in buildings of natural ventilation over A/C,
- Location of appropriate land uses at the street level interface (CZ5 permits mixed use with residential over)
- Creation of opportunities for orientation perpendicular to the streets running north south for solar access

The degree to which traffic noise is an issue is highly variable for different individuals and housing provided along Northbourne Avenue can be expected to appeal to people for a range of reasons regardless of the ambient noise levels. Nonetheless designs which provide mitigation of noise impacts whilst enabling natural ventilation and in particular night purging should be encouraged as part of energy efficient residential buildings where they are located fronting the avenue.

Item 4 Affordable Housing

The Institute notes the importance of the provision of affordable housing in the centre of the city near to services and public transport. Canberra is currently characterised by density at the perimeter through reduced housing block sizes and perimeter location of “affordable” housing, however, the initial capital cost versus long term financial drain on family resources due to relative costs of transport and access to services and the cost to the community to continuing to extend infrastructure for a low density of population.

North Canberra has an historic social mix which gives the centrally located area of Canberra a deserved reputation for diversity and vitality. Any new housing developments should not only maintain this housing variety, but enhance it and offer opportunities for further changes and choices.

As the demographics of Canberra evolve, more housing diversity for a range of household profiles will be required. North Canberra, especially the Northbourne Ave precinct, is well located to provide a leading support for these needs. The opportunities are available for both a range of housing types and density.

A flexible approach to planning policies can offer more choice of housing types not only now but also into the future when new and innovative types can be develop in a timely way to meet unpredicted demands.

Housing types should be well distributed (pepper and salted) throughout the precinct, and to add to the level of diversity and vitality, mixed zoning uses of residential and commercial should be allowed and even encouraged.

Choices of housing types to maintain a diverse social mix should address household sizes, (from singles to families), youth to aged, and all categories of affordability (including students and welfare recipients). A distribution of housing suitable for both owner occupation and rental accommodation also adds to the diversity of the precinct.

Affordable housing is required to ensure the retention of low-income households in the precinct. It will also support the ANU through providing off campus accommodation close to casual employment centres. It can also offer an incentive for ageing households (ie empty nesters) in the neighbouring suburbs to relocate to higher density and more suitably designed accommodation, thus allowing the larger suburban blocks and houses to be more sustainably occupied. These ageing properties may then undergo building improvements to their environmental performances by their new owners.

Due the central location of the Northbourne Avenue precinct and (by Canberra standards) its effective public transport services, car parking requirements for higher density housing developments should be reduced from current standards. Such a policy change would be in line with ACT Government's objective for a more sustainable City and its target for carbon neutrality.

The existing areas of public open space are abundant and well distributed, which can make medium and even higher density housing attractive to families.

North Canberra has an historic social mix which gives the centrally located area of Canberra a deserved reputation for diversity and vitality. Any new housing developments should not only maintain this housing variety, but enhance it and offer opportunities for further changes and choices.

As the demographics of Canberra evolve, more housing diversity for household profiles will be required. North Canberra, especially the Northbourne Avenue, precinct is well located provide a leading support for these needs. The opportunities are available for both a range of housing types and density.

A flexible approach to planning policies can offer more choice of housing types not only now but also into the future when new and innovative types can be promptly permitted to meet unpredictable demands.

Housing types should be well distributed (pepper and salted) throughout the precinct, and to add to the level of diversity and vitality, mixed zoning uses of residential and commercial should be allowed and even encouraged.

Choices of housing types to maintain a diverse social mix should address household sizes, (from singles to families), youth to aged, and all categories of affordability (including students and welfare

recipients). A distribution of housing suitable for both owner occupation and rental accommodation also adds to the diversity of the precinct.

Affordable housing is required to ensure the retention of low-income households in the precinct. But it can also offer an incentive for ageing households (ie empty nesters) in the neighbouring suburbs to relocate to higher density and more suitably designed accommodation, thus allowing the larger suburban blocks and houses to be more sustainably occupied by groups and families. These ageing properties are then more likely to undergo building improvements which enhance their environmental performances as their new owners shape them to suit their lifestyles. This may include opportunities for “granny flats”.

Due the central location of the Northbourne Ave precinct and (by Canberra standards) its effective public transport services, car parking requirements for higher density housing developments should be reduced from current standards particularly given the recommended implementation of the frequent service along Northbourne Avenue. Such a policy change would be in line with ACT Government’s objective for a more sustainable City and its target for carbon neutrality.

Existing Street Structure

The existing street structure at Dickson Group Centre does not permit ease of access for public transport travelling along Northbourne Avenue into the centre nor for pedestrians alighting on Northbourne Avenue to walk to the centre. The approaches into the group centre need to be reviewed to maximise the benefits of its proximity as a retail employment and recreational hub on this primary public transport corridor.

Public Realm

In addition to the infrastructure investigations flagged by the committee the Institute recommends consideration of the character and quality and ongoing commitment to maintenance of the public realm within and near the RZ4 and RZ3 development areas given the greater intensity of use and its capacity to supplement the private open space provided within developments

The existing areas of public open space are abundant and well distributed, which can make medium and even higher density housing attractive to families.

The Sullivans Creek and tributaries and the bounding open spaces provide significant assets that would benefit residents living in these higher density areas. Open spaces in close proximity to the RZ4 and RZ3 developments are required to sustain areas with enough interest and character to suit free play and exploration by children. These should provide a mixed range of uses such as sports fields, school grounds and playgrounds, wetlands community gardens as well as provide good visual presentation and outlook. The Institute recommends that the Committee investigate opportunities to enhance the landscape of the public realm adjacent to the RZ4 and RZ3 development areas in particular extension of the wetlands and naturalisation of the creek watercourses that are now encased in concrete. This could also include opportunities for community gardens.

There is some evidence of degradation of existing infrastructure performance through lack of use, such as the sewer system that could be enhanced by increasing the population density. It should be noted that all these suburbs have seen a decline in population since they were first built so that while the built form may have in some areas remained relatively static the number of people has decreased.

Item 5 Other Matters

Planning Policies Inhibiting Development

The Institute recommends further investigation of other policies that may be inhibiting a more rapid implementation of the densification in these areas be sought with a view to modifying controls if appropriate.

The Institute has been on record as recommended a fundamental review of all the residential codes to systematically identify where the multiplicity of controls to which developments are currently subject should be simplified around core performance objectives. The codes as they currently stand are unnecessarily onerous with a high level of micro management of design outcomes some of which have adverse consequences in consistency across sites, efficiency of land development and amenity and quality of built form resulting.

Architectural Heritage

The Northbourne Housing Precinct, on both sides of the Avenue in Dickson and Lyneham, has exceptional heritage value due to its outstanding design and its association with the development of communal housing in Canberra. The Precinct represents a high achievement of the ideal of innovative modern architecture and planning, and embodies the concept of a gateway to the city as required by the National Capital Development Commission in 1959. The Precinct is the only example of group public housing designed by Sydney Ancher, of the architecture firm Ancher Mortlock & Murray, one of Australia's most important designers of domestic architecture. The design characterises quality mid-20th-century modern architecture in the Post-War International style at a time when modern architectural design in Australia was in its early stages. The Precinct exhibits creative design in the form of five different residential types, including low-rise and medium-rise dwellings; bedsitter flats, paired housing, flats, maisonettes and courtyard housing, where each type is distinctive yet all combine to form a harmonious and well scaled ensemble. The place has been acknowledged for many years as a distinctive example of architecture and urban planning by professional bodies and individuals. It is included in the Commonwealth Government's Register of the National Estate; it is on the Australian Institute of Architects' National Heritage Register, and it is on the Australian Institute of Architects' ACT Chapter Register of Significant Twentieth Century Architecture. The Precinct was part of Canberra's post WWII housing development, and the first of that type designed for the newly formed NCDC, to accommodate the large number of public servants that moved to Canberra to work in the recently relocated government departments.

This precinct constitutes a significant site on the Northbourne Avenue frontage and the Institute recommends that, as part of the detailed consideration of development within the study areas the ACT Heritage Council should determine the heritage status of the precinct and commission the preparation of a conservation management plan that protects its heritage values as appropriate.

Other places on Northbourne Avenue listed on the ACT Chapter Register of Significant Twentieth Century Architecture are:

- Open Systems House (former Churchill House) 218 Northbourne Ave, designed by Robin Boyd.
- CSC Building (former Australian Automobile Association Building) 212 Northbourne Ave, designed by Raffin Maron.
- Northbourne Flats, Braddon & Turner. 110 Northbourne Ave, designed by Budden, Nagle & Michael.
- NRMA Building, designed by Stephenson & Turner.

The Chapter recommends the ACT Heritage Council consider the legal heritage status of these buildings.

Solar Access

The majority of blocks in the study area are oriented east-west between streets oriented north-south. To maximise solar access for developments a balance between street address and north facing habitable spaces needs to be achieved. Likewise considerations of built form to support solar access to roof areas for roof mounted solar equipment (water or PV) needs to be considered.

The current precinct code defines deep rooted planting areas along the rear boundary of most blocks. This is based on a traditional perimeter block development seen in many European cities at higher densities. This is focussed on the street frontage character. These blocks in Europe typically have communal or private outdoor space overlooked by most dwellings which is not problematic where it is culturally accepted but this is contradicted by other clauses within the precinct code focussed on privacy. The 100% site coverage of the primary building zone also permitted further emphasis on the focus on street frontage.

The position under rear power lines and above in-ground services limits the plant types suitable for these locations prior to co-ordinated undergrounding of services. The effective extension of the rear boundary setback restricts the opportunity within individual sites for creation of north facing rooms opening onto northern garden space. In addition, where the amalgamation of a number of blocks to create a larger east west block occurs suitable for multiple north facing dwellings, the 15m wide zone crossing the site would limit the effective use of the land.

The argument for maintaining deep rooted areas within suburban blocks to enhance the urban landscape is supported, but needs to be balanced with design choice and performance criteria about the best location to suit both resident amenity, and solar access (deciduous trees to the north of habitable rooms has many outlook, energy and microclimatic benefits).

Similarly, while the Institute strongly supports a clear focus on streetscape / public realm character, and would be supportive of perimeter developments (particularly where there is a communal open space to the rear i.e. co-operative housing and the like) given high levels of energy efficiency being achieved by means other than solar orientation, we also commend reconsideration of these controls where alternate configurations allow solar access to support more passive solar energy efficient housing forms where proposed. The Institute believes street address and access for residents, and positive contribution to the street character and life are the criteria to be used and met, not necessarily continuity of physical frontage.

Recent work undertaken by ACTPLA reviewing controls for solar access needs to be considered in more detail in established areas, where increased densities are sought with regard to the cost / benefit of solar access versus energy and land use efficiencies, both for sustainability at a communal level and individual residential amenity.

Energy Efficiency of Built Form

Recent research indicates that, not only can high densities of development be achieved at 2-4 stories, but that these lower forms can be the most energy efficient.

The Institute strongly recommends a review of existing Precinct, RZ3 and RZ4 residential development codes to ensure the fine grained higher density development can be achieved without unreasonable conflict between effective development of the land area, privacy between units and amenity within units. At this stage there is a measure to address this in the precinct code by not allowing a single house to be isolated between larger developments assuming long street frontages either side. As noted above there may be alternate configurations that also allow for finer grain development.

The Institute continues to be concerned about the micro management of urban design and building design that has evolved from Amcord, to deal with issues such as privacy as a purely physical control matter ignoring the social dimensions and producing significant impacts on development sustainability, quality and liveability. For example, controls via screening or restricting windows to a high level that reduce passive surveillance, access to natural light and outlook for one resident to provide physical controls to overlooking for the neighbour where if the neighbour has concerns they can act to screen their space from their side.

Conclusion and Recommendations

The Institute recommends:

- Removal of the restriction on development north of Wakefield and Macarthur Avenues and active review of policies to support highest best use in residential areas in the currently emerging redevelopment cycle,
- Performance guidelines requiring energy efficient residential development to ensure benefits from densification are not negated by increased energy or water consumption,
- Policy to embed well distributed affordable housing close to main public transport routes and facilities on the Inner North,
- Determination by the ACT Heritage Council of the heritage status of the Northbourne Housing Precinct designed by Sydney Ancher, and preparation of a conservation management plan for the precinct to maintain the heritage values as appropriate,
- Strategic planning of the open space network to maximise the usability and environmental benefits and a commitment to maintenance of the open space network to a standard to suit higher densities of use,
- Early commitment to the implementation of a 7.5 minute frequency bus service linking the residential and employments areas along Northbourne Avenue to Civic, Gungahlin and Dickson to support reduced car parking requirements and higher patronage, and
- A review of inner north precinct, multi-unit and single residential codes with a view to their radical simplification to focus on key issues regarding the street / public realm interface, contribution to environmental goals such as energy efficiency, water, and material conservation and a balanced approach to resident amenity versus the overall amenity of the urban environment. The degree of exception to general guidelines should be reviewed.