



Standing Committee on Planning  
ACT Legislative Assembly  
GPO Box 1020  
Canberra ACT 2601

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To whom it may concern,

**RE: Inquiry into the Territory Plan and other associated documents.**

On behalf of the Australian Institute of Architects – ACT Chapter, we submit an expression of interest to be included in the inquiry process for the review of the Territory Plan by the Standing Committee on Planning.

The Institute has been involved in the consultation process for the Territory Plan through submissions and attendance of information sessions and forums such as the Built Environment Coalition (BEC) and Planning and Construction Industry Chief Executive Reference Group (PACICERG).

The Institute provided a submission in March 2023 to the planning reform which illustrated our appreciation for having the opportunity to participate in the reform process and support much-needed reform. In the Institute's submission, we outlined some key areas of focus including:

- Legibility of the documents,
- Design vision,
- Planning for a climate resilient city,
- Compact city and delivering on the missing middle,
- Translating a vision into planning regulations,
- Affordable housing, and
- National Capital Design Review Panel and design quality.

The Institute is broadly supportive of the reformed Territory Plan, the District Strategies, and the Guides. We believe many of the above-mentioned key areas of focus have been addressed.

The Institute is supportive of changes to RZ2 zoning to include more diversity of dwelling typology through the inclusion of apartments, and changes to RZ1 zoning to allow for increased density through sub-division of blocks over 800m<sup>2</sup> with the ability for additional dwellings limited to 120m<sup>2</sup> in floor area.

However, the Institute remains concerned that changes to RZ1 and RZ2 zones will not provide the necessary outcomes required to deliver housing density and housing choice commensurate to the requirements for projected housing demand in our city both in the short-term and long-term.

The ACT government has indicated that around 40,000 blocks would be eligible to take advantage of the changes to RZ1 zoning. They also indicated in a recent PACICERG meeting that no specific review of block eligibility was conducted and that the figures presented were based solely on a calculation of the number of RZ1 blocks over 800m<sup>2</sup> in the ACT.



The Institute has completed a preliminary review of blocks in suburban areas to confirm that the RZ1 changes will not support the projected numbers of additional dwellings indicated by government. The review found that whilst there is a large number of eligible blocks (over 800m<sup>2</sup>), existing site conditions led to only a small number of blocks having infill potential. The Institute found the following outcomes:

- Hackett: 5% or 57 blocks have infill potential,
- Gowrie: 4% or 40 blocks have infill potential, and
- Scullin: 6% or 58 blocks have infill potential.

Using data sourced from ACTmapi, we have calculated that there are approximately 1,457 blocks over 800m<sup>2</sup> in the three suburbs mentioned and a total of only 155 that would be suitable for development without the demolition of an existing dwelling on the site.

The Institute has also looked at the affordability of subdivision and development of new housing in RZ1 zones and believes that economically many suburbs, such as Scullin and Gowrie mentioned above, will not meet affordability targets. Lease variation charges, high construction costs, and lower valuations of land and assets in many suburbs, particularly in the districts of Belconnen and Tuggeranong, result in reduced affordability and high-risk outcomes for financial institutions providing construction loans.

The Institute remains concerned that in addition to RZ1 zone changes not providing necessary opportunity for achieving a compact city through increased density, it will also lead to an increase in unsustainable practices through the unnecessary demolition of housing, with associated embodied carbon.

There are many opportunities available to increase density and housing choice in our city. The Institute was a strong supporter of the ACT Government's Demonstration Housing Project, which was a part of the government's Housing Choices Policy, with many of our members submitting projects into the program. Our members illustrated that, through good design, a variety of housing typologies were possible, could be achieved in suburban areas without impact on our garden city principles, and required minor changes to the Territory Plan.

The Institute suggests a review of the outcomes of the Demonstration Housing Project and the inclusion of additional RZ1 zoning changes that allow the typologies explored (Duplexes, Manor Housing, and Multi-generational Housing) an opportunity to be implemented without unnecessary delays created by the requirement of individual Territory Plan changes for individual blocks.

Should we be successful and have the opportunity to present to the Standing Committee at a public hearing, our representative would be Rob Henry, ACT Chapter Executive Director, who is contactable on [REDACTED] or at [REDACTED].

The Institute looks forward to the opportunity to present our research on the above-mentioned items and our knowledge of strategies for increased housing density, housing affordability, and housing choice.

Regards,

Shoba Cole  
Executive Director – ACT Chapter  
Australian Institute of Architects