

20 February 2023

The Officer Tasked
ACT Planning System Review and Reform Project
Environment, Planning and Sustainable Development Directorate
Dame Pattie Menzies Building
DICKSON ACT 2602
Via online lodgement portal

Dear Officer,

RE: Response to submission of representation and feedback on the draft new Territory Plan and draft district strategies: ACT Planning System Review and Reform Project: Block 2 Section 57 Greenway

We are writing on behalf of the lessee of Block 2 Section 57 Greenway as respondent to the ACT Planning System Review and Reform Project. We are replying to your request for feedback on the Draft new Territory Plan and draft District Strategies. The subject site leased by the Lessee is located in the eastern part of the Tuggeranong Town Centre (Figure 1 below) which is in the Division of Greenway, District of Tuggeranong.

The site

Block 2 Section 57 Greenway is a privately leased commercial Block, located on Anketell Street at the intersection of Reed Street South, in the south-eastern part of the Tuggeranong Town Centre. The subject site is currently developed for commercial (office) use with planning approvals in place for part redevelopment of the site for mixed-use residential development.



Figure 1 – Aerial map of Blocks 2, 7 and 8 Section 74 Holt (Source ACTMAPi, February 2022)



The block is bounded by roads on three sides and a public access/walking reserve to the south. The uses to the east and south are best characterized of medium and high rise high residential /mixed use development while the uses to the north, north-west and west are the police station and commercial uses (retail and bulky goods shops). Residential development to the east are up to 5 storeys in height and along Anketell Street buildings mixed use development rise to 12 storeys.

Current statutory and strategic planning context

The subject site was purchased by the lessee in the early 2010's for redevelopment. The proponent has been working with the Government and EPSDD over a long period of time, including the preparation of the Tuggeranong Master Plan (completed in 2012) and updated into the Territory Plan with PV318 in October 2014.

The development of the Tuggeranong Town Centre East mixed-use residential precinct located between the lake and Anketell Street south of Reed Street South, has seen an influx of a large population of resident households to the Town Centre. This development alongside other recent residential developments on the eastern side of the lake to the north and south of Soward Way , has seen the resident population of the Town Centre increased dramatically and demand for urban living and related services increased to support and service this growing community.

The proponent delivered multiple developments in the Tuggeranong Town Centre East Mixed Use residential precinct and note that demand for housing remained strong for the duration of this period and the availability for further residential development in the Town Centre, especially to the south of Soward Way is all but diminished.

The demand for residential dwellings in the Town Centre remains high and is very popular and development projects readily sells out; including during some periods of lesser economic activity over the last 10 years.



The ACT Planning System Review and Reform Project and Belconnen District Strategy: A Strategic Direction for additional Retirement and Aged Care facilities.

The ACT Planning System Review and Reform Project documents provide a unique insight into the structure, need and opportunities of the Tuggeranong Town Centre and District as a whole and its future development requirements. In considering the relevant documents (listed below) there are some strong trends that stand out and are worth considering. We refer specifically to the following documents:

- The Tuggeranong District Code,
- The Territory Plan Tuggeranong District Policy,
- The Commercial Zones Policy.

The Tuggeranong District Strategy

The Tuggeranong District Strategy, part of the overall 2023/4 Planning Reform project, is to respond to a growing and changing Canberra. With more people living and working in the ACT, the Government identified a need for a progressive planning system that will facilitate the growth without compromising the characteristics and values of the city.

The Tuggeranong District Strategy is one of nine District Strategies that seeks to bridge the gap between city wide strategic planning and the local area planning captured in the Territory Plan. We understand that the District Strategies are intended to provide a line-of-sight between metropolitan level planning, policies and legislation and on-the-ground outcomes that are influenced through the Territory Plan for each of the districts in Canberra, by providing a guide for the implementation of the ACT Planning Strategy including guiding desirable areas for development and growth, change in character, services, amenities and the like. The Strategy will in part inform the provision of infrastructure, community needs and the assessment of major development and rezoning proposals and provide more detailed precinct and site planning. The aim being to achieve better coordination between infrastructure, transport, planning, climate change and living infrastructure strategies and delivery of growth and development initiatives at a district level.

District strategies are to ...inform the preparation of the district policies in identifying areas of potential future land use change and providing guidance on the expected character of development in those areas. District Strategies are to be living documents that are regularly updated and are to reflect “... new ideas, projects, strategies or policies adopted by the Government, and updated Census data, population and employment projections.”

It is worth noting that the District Strategies contemplate the current district context against two timeline horizons; 2046 (~25 year horizon) and 2063 (when Canberra is forecasted to need ~100,000 new dwellings). The Strategy state that the recent ACT Treasury population projections (prepared in 2022 based on 2016 Census data) suggest that 100,000 additional dwellings in the ACT will be required through to around 2063 based on a substantial increase in population.

Tuggeranong is the 2nd largest District by population (after Belconnen) and houses almost 90,000 Canberrans, most that are aged between 30 and 64 years old. Most people in Tuggeranong live in stand-alone (single houses (80%) while only 6% of housing stock are apartment typologies. This statistic is starker when considering that the last 10 years has seen the development of nearly all the apartment stock in this District in and around the Town Centre. The opportunity to make housing choices to types other than single dwelling homes are severely limited. About 30% of households in Canberra rent their accommodation and in



Tuggeranong about 24% of rental households are in rental stress. There is clearly a very limited opportunity available to persons living in Tuggeranong to make more affordable housing choices other than living in a single dwelling house.

It is interesting to note that the Strategy sets an aspiration to have 3,000 new dwellings built by 2046 and a further 4,800 by 2063. Of these the majority (88%) is earmarked to be medium density build forms and 12% to be high density.

The district has established infrastructure and centres, that can be built on to sustain and improve its accessibility, amenity and employment opportunities for current and future residents (p86). The Town Centre is the core of economic activity of the district and houses the majority of the circa 19,000 employment opportunities occupied. With the increase in population forecasted there is a growth in job numbers anticipated including 2,800 new jobs by 2046 and an additional 5,300 new jobs expected by 2063. Most new jobs are likely to be in the knowledge intensive, health or education sectors.

The macro trends and issues affecting planning policy are set out to be:

- Climate Change as a fundamental threat to our existing way of life and a primary consideration in planning for cities including consideration of sustainability and carbon impacts, greenhouse gas emissions. This requires resilience planning considered against locations for and types of development along with urban design and built form planning.
- Transport innovations and active travel to include provide flexible, reliable and sustainable options for Canberrans to travel.
- City-shaping transport infrastructure to shape and dictate the urban form of a city.
- Future industries and employment including ways of working that are constantly evolving, including for example, more people working from home.
- Housing affordability as a critical issue with property prices and rents in Canberra consistently among the most expensive in Australia. Opportunities to support housing affordability including facilitating housing choice and diversity, and locating future housing close to amenities and services to minimise other costs of living for residents are some key considerations.

The community echoed some of these themes and the Strategy particularly highlight the following community sentiments, which are of interest in this submission:

- Increase street tree and undergrowth planting to support wildlife and improve urban cooling.
- Upgrade paths and accessible paths.
- Increase connection, frequency, sustainability and utilisation of the public transport network.
- Locate urban density near commercial centres complemented with greenspaces.
- Provide diverse housing including public housing, affordable housing, ageing in place and family homes.
- Design and construct new buildings to high environmental standards.
- Increase employment opportunities in urban centres.

The Vision of the 2018 ACT Planning Strategy is for Canberra to be a sustainable, competitive and equitable city that respects Canberra as a city in the landscape and the national capital, while being responsive to the future and resilient to change and include the following themes:

- A compact and efficient city that grows mostly within its footprint, maintain environmental values, and use infrastructure effectively while supporting efficient, sustainable and liveable city.

- Diverse Canberra that supports a city structure that strengthens our economy and the economy of the region.
- A Sustainable and Resilient city that adopts to climate change and establish resilience in our build forms.
- A liveability that creates cohesive communities through good design, amenity and connectivity and support housing diversity.
- An accessible city that provide equal access to the services of the city, more options to get around and better integrated land use and transport planning.

The District Strategy highlight the following characteristics of the Town Centre:

- It enjoys the highest job density and relative access to jobs (Figure 15 p47)
- Integrated with the Strategic movement networks of the city connection a relatively poorly connected part of the City with city wide amenities (p51,52),
- The Town Centre is a key urban intensification area (p52)
- Well position to generate sustainable neighbourhoods with the integration of land uses, urban density, local amenity, walkability and connectivity. In areas where more amenities and services are located more density and diversity can be supported. New development brings means for sustainable transformation with opportunities to encourage walking and local liveability (p55)
- Centres provide a strong mix of employment and residential use. Mixed use centres provide opportunity for land use and build form diversity that contribute to affordability and choice (e.g. working from home). Mixed-use developments cannot apply in all precincts and allowing for too much development of typical mixed-use typologies outside of centres could undermine the centres hierarchy (p57).
- **Expand capacity for more density around centres in the right places (p57), - Areas close to centres are the logical location for higher density housing and development to be concentrated with housing densities in some centres lower than what they should be. More density can bring more choice to different households, address housing diversity and affordability.**
- Future development and new homes are best located in the most liveable and well-served locations, consistent with good planning principles informed by liveability indicators (p57).
- The Town Centre South is a relatively high suitability area for new housing (Figure 19 p58).
- Canberra should strive to encourage movement across diverse travel modes to combat dependency on cars to move about our cities.
- Travel distances between Tuggeranong and surrounding districts are long and the connection to light rail still some time away.
- The largely suburban and low-density character of the district suggest that future intensification opportunities outside of the town centre and strategic public transport corridors are relatively limited. No future areas are presently identified specifically for residential development in the district. The areas with the best overall suitability for future growth are generally concentrated in the town centre and northern half of the district (p88),
- The entire Town Centre is marked as a possible change area (Figure 31 p95). The Strategy contemplates a higher density urban core around the town centre including a greater mix of densities and uses. Sustainable neighbourhoods will address housing affordability land supply for different needs and budgets. This is listed as a short-term issue in Table 13 (p109)



The subject site in the context of the District Strategy and Draft Territory Plan

It is hard to fault some of the key findings listed in the District Strategy and highlighted above and to see the opportunity to deliver this vision on the subject site. As Canberra continues to grow, the need and importance for Tuggeranong to play its part in delivering the objectives as set out in the 2018 ACT Planning Strategy is unquestionable. The ability to deliver sustainable, livable, integrated and affordable housing in the Town Centre is not only well outlined in the District Strategy; it makes logical planning sense.

The District Strategy specifically highlights the subject site in Figure 36 as a key sustainable neighborhood transect but appears to not fully grasp the development opportunity that is presented at the site. The Draft Tuggeranong District Strategy only provides development densities of up to 24m (circa 8 storeys) at the intersection of Anketell Street/Reed Street South and less density (circa 6-7 storeys) for the rest of the site. This is in contrast to the adjoining development to the south that permits development up to 12 storeys and 31m height limits to the north of the site.

The site is clearly part of the south-eastern residential precinct albeit it has been excluded by virtue of its history being a private lease that was not included in the Government Land release that makes up the rest of the residential precinct. There is no reason this site would not perform equally well (or better) from a residential development and housing delivery opportunity than neighboring developments to the south. And when contemplating its position in the geographical setting of the Town Centre (with specific reference to Figure 4 of the District Policy) it can and should play a marker role at the entry to the south-east residential precinct in a similar that density contemplated for Block 5 Section 13 Greenway. The latter was relatively recently developed as medium density low rise townhouse development and represents a missed opportunity to create the much-needed diversity and affordability opportunities for housing in the Town Centre. This may be corrected and the policy opportunity realized sometime in the future.

The subject site Block 2 Section 57 Greenway is ready for development and the lessee is motivated to continue delivering housing opportunities for residents in the Town Centre, as he has done for the last circa 15 years. There are very little, almost spade ready, opportunities available at present in the Town Centre to continue delivering high density residential development other than the subject site; a choice that has proven very popular since Town centre living became available with the release of the South-eastern residential precinct.

The aspirations of the District Strategy for development of the subject site with community and retail facilities located prominently and in a manner that will create a destination of activity (p117) can only be released in a built form that supports the highest level of density, amenity and diversity in use and housing types. Figure 38 of the Strategy can be achieved at the site in a precinct that permits built forms of up to circa 12 storeys,



the Urban Character T6 (Figure 12 p127), as opposed to the suggested development outcome of the District Policy and suggested T5 urban character.

The subject site characteristics that support this notion, with consideration of the key findings of the District Strategy as outlined above are:

- Well positioned to be the marker precinct of the South-east residential precinct,
- Able to provide a genuine mixed-use precinct that include retail, community, service and affordable housing typologies in a high-density urban form,
- Further support a growing residential population in the Town Centre that will provide homes to employees and support businesses with well-located housing opportunities.
- Providing affordable housing typologies that integrates with a sustainable, walkable and amenity rich urban core.
- Contribute to the creation of new dwellings of a high density/apartment type that is required by 2046. Noting that there is limited opportunity for delivering this typology it seems sensible to utilise the site to its fullest capacity.
- The development of the site as a true mixed-use residential/commercial precinct will assist in delivering a broad range of objectives set out in the District Plan.

In order to deliver this opportunity, we request that EPSDD make some minor changes to the District Strategy to clearly identify the subjection site as the pre-eminent marker development locality for the south-eastern residential precinct and a key mixed use development opportunity that the site represents and the strategy suggests. We further request that the Territory Plan (Tuggeranong District Policy) be updated to reflect the opportunity for the site to be developed to its true potential in the urban fabric. The opportunity to capture this outcome for the city and the Town Centre exists now and will be available for only a short period of time noting that there are approved Development Applications at the site that the Developer will progress those plans should the planning policies not be amendment. A change that is substantial enough to warrant consideration against the likely increased project risks will have the developer reconsider the current development path for the site in favour of a development outcome that matches the District Strategy objectives as expressed and outlined above.



We are available at any time to meet with you or the authority to discuss any matter relating to this submission as may be required. Should you have any further queries, please do not hesitate to contact [REDACTED]

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Kind Regards

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