



Submission:

ACT Planning Review:

Social planning for a changing Canberra

February 2021

About ACTCOSS

ACTCOSS acknowledges Canberra has been built on the land of the Ngunnawal people. We pay respects to their Elders and recognise the strength and resilience of Aboriginal and/or Torres Strait Islander peoples. We celebrate Aboriginal and/or Torres Strait Islander cultures and ongoing contributions to the ACT community.

The ACT Council of Social Service Inc. (ACTCOSS) advocates for social justice in the ACT and represents not-for-profit community organisations.

ACTCOSS is a member of the nationwide COSS Network, made up of each of the state and territory Councils and the national body, the Australian Council of Social Service (ACOSS).

ACTCOSS's vision is for Canberra to be a just, safe and sustainable community in which everyone has the opportunity for self-determination and a fair share of resources and services.

The membership of the Council includes the majority of community-based service providers in the social welfare area, a range of community associations and networks, self-help and consumer groups and interested individuals.

ACTCOSS advises that this document may be publicly distributed, including by placing a copy on our website.

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Acronyms

ACTCOSS	ACT Council of Social Service Inc.
AHURI	Australian Housing and Urban Research Institute
CDNet	Community Development Network
EPSDD	Environment, Planning and Sustainable Development Directorate
SPIRE	Surgical Procedures, Interventional. Radiology and Emergency

Introduction

Amid a major planning review, Canberra is already a city radically transformed.

Canberra is more populous, its inner suburbs denser. There is rapid greenfield development on the outskirts of the ACT.

New suburbs like Coombs, Wright, Forde and Whitlam are emerging as population centres on Canberra's outskirts.

Skylines of older suburbs, Woden, Dickson and Belconnen are being changed through higher and denser apartment living.

While urban renewal is being attempted in larger centres, many older suburbs like Calwell and Charnwood lack good community spaces and have rundown community spaces.

Town centres established in the last twenty years are no longer new, but they still feel incomplete. Many have experienced long periods without some local amenities, like quality recreational opportunities for young people. Gungahlin, and the satellites it serves, is only now getting a cinema and swimming pool. Residents in many Canberra suburbs have waited a long time for basic amenities, including transport links, leaving residents experiencing disadvantage unable to easily access amenities and services.

New precincts that blur residential and industrial development, like Dairy Road, are also on the horizon. In some cases, developers have pursued deep engagement with community from the master planning stage onwards. Most have not.

The old hub-and-spoke model of planning in Canberra where town centres were surrounded by satellite suburbs, an outgrowth of the city design from the period of the Walter and Marnie Burnie-Griffin Plan, is no longer the norm. There is more change on the way as we occupy the outskirts of the Territory and the program of urban infill intensifies.

Work patterns are also changing. While the Australian Public Service remains a big part of the local economy, its share of the economy is shrinking. Where we

work and how we work is changing. There are more people working in the private sector, tourism and hospitality, community services, health and the gig economy. People change jobs more frequently.

Canberra is a growing town through migration and births. There are also growing numbers of older Canberrans. For example, the number of retirement communities has grown, as have the numbers of people in care and supported living. More people are getting around using mobility scooters, walkers and accessing on-demand transport (when it is available).

And many people are being left behind. We have pockets of deep-seated poverty, homelessness and inequality that are becoming entrenched by housing unaffordability and cost of living pressures. The city's transformation risks exacerbating disadvantage, forcing vulnerable people into dwellings and suburbs that isolate and exclude.

Further, climate change, fires and the pandemic are changing the way we work, travel, live and interact with personal and private spaces. Last year people were gathering in public airconditioned spaces to escape cold, heat and smoke. Since March 2020, we have retreated from public space; people have had long periods at home due to COVID-19 requiring good digital connectivity.

More recently, during lockdown, local green spaces and walking tracks, that allow for physical distancing while people exercise, have become even more valuable and vital for people in periods of isolation. The role of fit-for-purpose localised public and private spaces in the quality of life of people living in our city has never been clearer.

While change is happening all around us, the ACT's planning processes, our priorities and engagement mechanisms have not kept up with the pace of change. They have not adjusted to reflect the changing population. They have not always been up to the task of responding to community need. And the outcomes of the planning process have not always worked for the most vulnerable people in our community.

Social planning

Not everyone is consulted and not everyone gets planned for. Social planning is the practice of strategic planning applied to addressing identified social objectives. We believe that all ACT planning should include the objectives of reducing inequality and promoting the inclusion and participation of community members who face disadvantage.

While there have been welcome discussions about how people have been engaged in the planning review process, we have not yet seen significant acceptance and adoption of social planning.

This includes in the ACT Planning System Review and Reform set of discussion papers, which flag possible changes to the Territory's planning system released in November.

This submission takes a social planning approach and highlights our priorities in the design of a new planning system and considerations for better planning in Canberra as we head towards the next Territory Plan and continue through an ongoing period of rapid development across our city. It canvasses our views on the planning priorities within the ACT Parliamentary Agreement and progress of the ACT Planning Review.

It explains why planning is assuming increasing importance to ACTCOSS and describes the city we want, the integration we need across planning and transport and other amenities, and sets out the work that needs to happen for us to arrive in a liveable, socially inclusive and successful city.

Executive summary

In designing a new planning system, ACTCOSS urges that priority be given to planning which is evidence based, focused on those most affected by poor planning decisions and which improves the quality of planning outcomes.

Outcomes of all planning in the ACT should include the availability of social and community infrastructure where needed, the creation of safe and inclusive public spaces and universal improvements to affordability, accessibility and sustainability of housing and other infrastructure.

Specifically, outcomes from the planning review must include:

- Social planning with people on low incomes or facing other disadvantage at the heart of a new system
- Social planning capacity built within the ACT Government (a specific social planning unit)
- Increased affordable housing supply across Canberra to meet the shortfall of 3,000 dwellings
- Increased liveable design features in housing and other infrastructure including homes built to universal design standards and accessibility for people with disability and reduced mobility
- Mechanisms to ensure planning decisions respond to the needs of the people who live here, particularly groups who face disadvantage. We call for a community needs analysis of transport; a community needs analysis of community facilities; and a community needs analysis of person-led community development services
- Improved building standards for housing and other infrastructure – including higher building quality, improved safety, improved accessibility for older people and people with disabilities, increased energy efficiency and adequate greenspace
- More community facilities, community development resources, greenspace and social spaces and amenities, particularly in areas of high-density developments and new suburbs

- More engagement with vulnerable and disadvantaged people, including lived experience groups and peak bodies, through properly resourced consultation mechanisms.

Why planning

ACTCOSS is invested in a good planning system for Canberra because:

- Canberra's population is growing and population projections indicate our city will need to cater for over 600,000 people by 2050¹
- Our population is ageing. In 2016, 12% of our population was aged 65 or over, with that figure expected to continue to rise.² The change in our demographic profile has significant implications for housing provision, community services and infrastructure
- A transparent and responsive planning system is most likely to result in successful community engagement and trust. This will, in turn, lead to better development. On the flipside, a compromised planning system will lead to perverse outcomes that do not meet the needs of Canberrans, particularly those who are marginalised
- There is growing body of evidence that links well-planned cities to good health, wellbeing, human rights and social justice outcomes. For instance, a Planning Institute of Australia position statement on planning for healthy communities, says planners can assist in creating healthy supportive places through advocacy, legislation, policy, strategy, design, review and approval. They cite a 'virtuous circle' where good decisions can reduce sedentary behaviours by supporting physical activity, improve access to healthy food, and create safe environments that prevent injury and encourage social activity, while improving community belonging and integration³
- While parts of Canberra are well planned, we do not have consistently good outcomes:
 - There are patches of neglected, fraying and limited social infrastructure in Canberra in both older suburbs and in new greenfields development. For instance:
 - Suburbs in the Molongolo Valley like Coombs and Wright have limited access to shops, meeting spaces, play spaces and recreational and sporting facilities

1 ACT Government, *Canberra's living infrastructure plan: cooling the city*, ACT Government, 2019, <https://apo.org.au/node/259131>

2 ACT Government, *A growing and diversifying population*, ACT Planning Strategy website, n.d., <https://www.planning.act.gov.au/act-planning-strategy/setting-the-scene/a-growing-and-diversifying-population>

3 Planning Institute of Australia, *Planning for Healthy Communities Position Statement*, Planning Institute of Australia, May 2016, <https://www.planning.org.au/policy/planning-for-healthy-communities>

- In older suburbs there is a lack of contemporary community meeting spaces outside of older school buildings which sometimes lack airconditioning, temperature control or good parking and disability access (for example, Hackett)
- More broadly, growth is not being matched by adequate numbers of places and spaces for people to gather, nor by the development of local commerce
- Currently, the ACT does not plan well for affordable and accessible housing. The system is producing too little of it and it is not available in the places where it needs to be. Some affordable housing is starting to be clustered in places away from the services people need, often in remote suburbs. One example is the experience of people rehoused from the Northbourne Flats
- In the ACT, building quality and the overall quality of development is patchy. The evidence suggests that developers are not invested in social planning. That means that the ACT is not creating high-quality communities and living spaces as part of the development of residential and commercial complexes. While ACTCOSS has generally been supportive of increased density, there is significant unease in the community and among ACTCOSS stakeholders. This unease is driven by the lack of provision for social amenity in high-density developments
- There is inconsistent integration of planning for transport with building planning. In some areas of Canberra, people lack access to a seamless path of travel from their new homes to places of community, employment and specialist services
- Planning conversations in the ACT do not consistently represent the diversity of voices in our community including people with disabilities, older people, Aboriginal and/or Torres Strait Islander people, homeless people, people on low incomes, CALD Canberrans, and young people.

The review process

Review purpose

The Territory Plan was last reviewed more than 10 years ago. The ACT Government announced a review of the ACT Territory Planning System in mid-2018 and its stated purpose was to deliver a clear, easy-to-use planning system that achieves high-quality outcomes.

The ACT Government has expressed a view that the current plan is complex, convoluted and overly prescriptive. It believes it does not facilitate the best development outcomes for Canberra.

In commencing the review, it indicated that the collective outcomes for the plan should be developed in collaboration with community and industry through a process with contestability, honesty and integrity.⁴

The ACT Government said it intended to develop and model a collaborative approach to a review of the planning system in Canberra.

The ACT Government and the Chief Planner summarised issues with the current planning framework including:

- There is no opportunity to consider both compliance and merit in development application assessment. The existing plan is inflexible and does not provide sufficient powers to the ACT Government to refuse poor-quality development that is compliant with planning rules. Nor does it permit high quality development, that for good reason may have some non-compliance with planning rules, to be approved
- There are conflicts between the Territory Plan and leases issued
- The plan and the zone objectives are not clear
- There is a plethora of zones within the plan, and the outcomes they seek to achieve are not clear (e.g. commercial zones that permit residential land uses)
- There is no common approach to basic planning controls for zoning, building height or density
- There is no commitment to important concepts such as design excellence or what the ACT Government describes as contextual analysis (for instance, considering a development proposal in the context of its relative merits)
- The plan needs to be updated to reflect current government policy and directions (for example, the ACT Planning Strategy 2018).

Following completion of Stage 1, the ACT Government articulated its desired outcomes for the review project.

The review project should develop a clear, easy-to-use planning system that delivers improved spatial and built outcomes across the Territory. In particular, the reformed system should:

- Facilitate new development and additional housing supply while protecting those aspects of the city that made it an attractive place to live in the first place
- Instil confidence in the community by providing greater clarity on the desired outcomes of the planning system
- Provide flexible assessment pathways that are appropriate to the scale and scope of development.

⁴ ACT Government Environment and Sustainable Development Directorate, Papers tabled at Environment and Planning Forum, 15 February 2019.

ACTCOSS views on these objectives

ACTCOSS agrees with some of these objectives and outcomes, does not agree with others, and believes that additional objectives should be pursued as follows:

1. Priority must be given to *affordable* housing supply, especially affordable rental, accessible by people in the first two income quintiles
2. A strong, explicit commitment to social planning for the city
3. A planning system that works to maximise access and use of public spaces and places by disadvantaged and marginalised groups such as people with disability and older people, as well as people on low incomes, who would benefit from intentional inclusive planning
4. We agree that the current review process prevents the separate consideration and balancing of compliance versus merit. We argue there needs to be a greater weight given to merit versus compliance for approving developments that can produce quality planning outcomes
5. Where flexibility on non-compliant development is applied, it must be for the purpose of enabling and prioritising development that has clear merit – safe, sustainable, accessible, affordable homes and community amenities that maximise participation, connection and quality of life, particularly for people on low incomes
6. Flexibility must not lead to rushed approval of poor developments, that leave vulnerable people with reduced services, connections and amenity
7. We agree that the planning system needs to be easier to understand and easier to engage with for the Canberra community, particularly people facing disadvantage. We do not accept that simplification of the approval and assessment system for for-profit developers should be a priority of planning system reform. Simplification should only be considered if it leads to more community engagement and better overall outcomes for people on low incomes. However, simplification for not-for-profit developers should be a priority
8. The outcome of any change must be a system that delivers quality spaces to live in, more affordable and universally designed housing, good outcomes for Canberra residents, transparency of decision making and genuine community engagement
9. ACTCOSS is not opposed to increased density where it produces more affordable housing in areas with good amenity. However, the review needs to clearly articulate the principles and expectations upon developers who are creating high density. These should include:
 - Quality and building safety
 - Community facilities
 - Living infrastructure/greenspace

- Affordable housing (including rental)
 - Accessibility and universal design features
 - Architectural, place and space features which promote inclusion (cultural identity, youth friendly, an absence of 'hostile architecture' against homeless people, accessible and available)
10. ACTCOSS wants planning decisions that are based on sound evidence around the needs of people who live here. Demographic data, movement patterns, changing needs and patterns of work, travel and service access must be explicitly evidenced in decision making
 11. Planning and development approval systems to pay more attention to engaging with people on low incomes and vulnerable and marginalised people who are often absent from planning conversations. We provide more detail on engagement below.

Quality engagement

Environment, Planning and Sustainable Development Directorate (EPSDD) and the Chief Planner have proactively engaged during the review including hosting co-design workshops, engagement through the Environment and Planning Forum (EPF), and a deliberative panel. We acknowledge quality and productive engagement in the early phases of the review.

Our views on engagement are that:

- Quality engagement, as demonstrated during the review, should be reflected in the new planning system
- Engagement should reach beyond existing residents groups and community councils to include stakeholders and groups representing marginalised and vulnerable people. Canberrans facing disadvantage or vulnerability have the most to lose from bad planning decisions. Groups frequently excluded from planning discussions include people experiencing or at risk of homelessness, older Canberrans, people with disabilities, Aboriginal and/or Torres Strait Islander communities, precarious workers, women and young people
- Engagement should be properly resourced across the planning review and in the reformed planning system. This includes community councils as well as peak bodies
- There are specific planning areas which require ongoing lived experience input – these include working with people with disabilities and older people to improve access to the built environment
- Engagement on the Territory Plan Review and the broader planning system should be ongoing.

The review outcomes we need

1. Commitment to a social planning approach from developers and governments

What is good planning?

The Planning Institute of Australia has described the core principles and key elements of good planning as follows:

Good planning requires high quality, transparent and efficient planning practices and systems. To achieve the outcomes that advance the public interest requires the following core elements:

- Opportunities for the community and key stakeholders to actively contribute to the planning process in a manner that is effective, inclusive, respectful of community values and genuine;
- Strong leadership from both the industry and elected members that values and respects the need and benefits of effective planning;
- A planning profession and workplace culture that delivers and embraces the value of planning;
- Legislation and governance structures that facilitate integration of national, state, regional and local policies in a clear hierarchy, including spatial plans at both regional and local scales;
- Evidence-based strategic planning at all levels of government, and a demonstrated commitment to implement plans aligned with infrastructure funding and delivery;
- Planning instruments that are performance-based, responsive, equitable, legible and provide certainty around planned outcomes and milestones;
- Advice and support from a range of disciplines such as urban design, engineering, transport planning, social planning, ecology, and/or a range of others, that inform and add value to the planning efforts; and
- Planning rules and approval conditions that deliver positive environmental and social outcomes.⁵

Social planning

ACTCOSS supports the principles of social planning.

The Planning Institute of Australia describes social planning as:

⁵ Planning Institute of Australia, *What is Good Planning*, Planning Institute of Australia, September 2013, <https://www.planning.org.au/policy/what-is-good-planning-0913>

planning for the needs and aspirations of people and communities through strategic policy and action, integrated with urban, regional and other planning activity. Social planning is founded on the principles of social justice (equity, access, participation and rights) and aims to enhance community well-being and effectiveness.⁶

The core competencies of social planning are:

- Accessibility and Mobility
- Community development
- Cultural heritage
- Cultural planning and development
- Economic development and employment
- Health and safety
- Housing
- Participation
- Recreation Planning
- Human services planning
- Community facilities planning
- Sense of place and identity
- Social impact assessment
- Social inclusion.⁷

The Australian Housing and Urban Research Institute (AHURI) has recently evaluated urban renewal programs in Australia on a neighbourhood scale, finding that place-based interventions have the potential to provide greater social equity for disadvantaged communities and help allocate resources more efficiently. Place-based approaches bring together citizens in a place to address the complex needs of communities by harnessing the ideas, resources and knowledge of that community. AHURI says:

Liveable communities are 'safe, socially cohesive and inclusive, and environmentally sustainable. They have affordable housing that is linked to employment; education; shops and services; public open space; and social, cultural and recreational opportunities'. Liveability is shaped by the built environment. Providing green spaces and opportunities for active transport or social interaction are some examples of how 'liveability' might be delivered, yet how these outcomes can be achieved is rarely elaborated in planning strategies. There is a heightened awareness of the importance of

6 Planning Institute of Australia, *Social Planning*, Planning Institute of Australia, 2021, <https://www.planning.org.au/aboutpia/social-planning>

7 Planning Institute of Australia, *Social Planning*.

active transport options, and green spaces in the context of the COVID-19 pandemic.⁸

Recommendations

The ACT Government demonstrate a commitment to principles of social planning to achieve a sustainable, connected and harmonious community by ensuring the planning system:

- Focuses on people who face disadvantage, with a greater emphasis on liveability, wellbeing and health
- Embeds community co-design, consultation and engagement
- Links planning for housing with planning of transport and other amenities to achieve good placemaking outcomes.

Resources to make social planning happen

A dedicated social planning unit within the Environment Planning and Sustainable Development Directorate should be established.

Their work agenda must include:

- Ensuring social planning principles (like access, liveability and planning for health and wellbeing) are incorporated into land release policies and development decisions
- Use of the ACT Government's Wellbeing Framework as a guide for planning decisions
- Encouraging developers to take a curatorial approach – for instance, ensuring that housing developments and additional density is accompanied by appropriate amenity, community infrastructure and local commerce for new residents and existing residents
- Ensuring proactive consultation with people most affected by planning and transport decisions including people with disability, young people, Aboriginal and/or Torres Strait Islander people, women, and groups representing low-income and marginalised Canberrans. This will require targeted engagement with these communities and capacity building of communities on issues relating to social planning and policy

8 AHURI, *Creating places that support wellbeing and community participation - Place based approaches and community engagement: facilitating healthy, liveable, walkable, lively and inclusive cities*, AHURI Brief, AHURI, Melbourne, 27 July 2020, <https://www.ahuri.edu.au/research/ahuri-briefs/creating-places-that-support-wellbeing-and-community-participation>

- For instance, the social planning team might host a dedicated lived experience access committee for older people and people with disabilities to inform planning decisions and policies.

Recommendation

The ACT Government establish a social planning unit to oversee the application of social planning principles to ACT planning processes and decisions. The social planning unit would also focus on amplifying missing voices in planning, ensuring inclusive planning and building approaches to planning that resulted in better public spaces for people with barriers and access challenges and ensuring the integration of inclusive approaches across transport and the built environment.

2. In-depth needs assessment

Demographic changes mean separate audits and stocktakes of community needs are urgent and overdue.

An audit would acknowledge the changing demographic characteristics of each ACT region, levels of disadvantage and the respective requirement for new and/or improved facilities and services.

To achieve evidence-based social planning outcomes, the ACT Government must conduct an in-depth community needs assessment on:

1. Community facilities
2. Community development services
3. Transport.

The needs analysis should reflect the demographic characteristics of every region including levels of disadvantage and the current availability and distribution of facilities and services.

The timing of these should be synchronised so that we can overlay the outcomes and develop a comprehensive understanding of gaps and opportunities to plan for well-connected communities.

Recommendation

The ACT Government commit to evidence-based approaches to planning and conduct needs assessments for community facilities, community development services and transport. The government must commit to ongoing periodic audits to ensure transport, planning and development investment continue to meet community need.

3. Action on planning commitments in the Parliamentary Agreement

ACTCOSS supports some commitments and aspirations in the ACT Parliamentary and Governing Agreement for the 10th Assembly, which are related to planning in the ACT and provides conditional support for others.

Strongly supported

ACTCOSS strongly supports:

- Measures to phase out of fossil-fuel gas in the ACT by 2045 at the latest, measures to support energy grid stability and measures to support vulnerable households (within a just transition)
- Adopting an ACT Appendix to the Building Code of Australia in conjunction with the Territory Plan Review, which will set out improved sustainability standards that all new buildings must meet (addressing issues such as insulation, glazing, passive design, phasing out gas, and the requirement for electric vehicle charge points)
- Driving sustainable building innovation by piloting land release to include at least one 'showcase' sustainable development each year, such as a 150% living infrastructure plot ratio or a 'Scope 3' zero-emissions development that produces no net greenhouse emissions during construction and operation, and reduced car parking
- Increasing new dwelling site supply to meet increased demand across the housing spectrum with a focus on delivering the ACT Housing Strategy commitments
- Substantially lifting the quality and sustainability of the design and construction of new developments
- Improving community consultation and involvement in the development of Canberra
- Helping households and business become climate-change ready
- Ensuring the planning and housing system continues to deliver affordable housing.

Provisionally supported

ACTCOSS provides support for some measures with caveats (we have listed these as subpoints below):

- We provisionally support the idea of delivering a ‘community compact’ process to find ways to encourage affordable housing while protecting our trees, greenspace and heritage. The compact will bring together a wide range of different groups in the community, including residents’ groups, younger people, government and developers
 - We agree. However, the compact should not compromise the capacity to deliver core affordable housing commitments, and the community, including ACTCOSS, should be consulted on the groups included in the compact to ensure it is representative of people facing disadvantage
- ACTCOSS notes the intention to proceed with previously agreed recommendations of the Standing Committee on Planning and Urban Renewal’s inquiry on development applications to improve the timeliness, consistency and the accessibility of the development application process in the ACT
 - We broadly agree. However, we note that measures to improve timeliness should not compromise quality or opportunities for resident engagement. The focus should also be on improving simplicity for residents, peaks, community housing providers and others with a stake in city placemaking – not just for-profit developers
- The Parliamentary Agreement includes a commitment to fund an independent planning advisory service for residents impacted by planning decisions or development applications, so they can seek advice on lodging complaints or seeking review of decisions
 - This should prioritise funding for groups of residents and populations currently excluded from planning conversations – to support them to have a say on development applications and also to advocate for development which meets their needs
- We note the Parliamentary Agreement includes a commitment to support clubs to become heat and smoke refuges for local communities. This will include ensuring appropriate air filtration systems, and financial payments for venues designated as official extreme weather refuge sites
 - ACTCOSS notes the need for a *range* of built infrastructure and public spaces (*not just clubs*) to become heat and smoke refuges. There should be heat and smoke refuges in the ACT that do not require people to spend money, observe a dress code or experience proximity to alcohol and gaming activities.

Recommendation

The ACT Government implements planning measures in the Parliamentary and Governing Agreement in a timely manner ensuring that the needs of people facing disadvantage are prioritised and included as noted above.

4. Work to engage missing voices

ACTCOSS supports proactive, targeted engagement with people who are often absent from planning conversations. Engagement on ACT planning issues needs to broaden beyond discussions focused on individual developments to wider discussions on area planning. All planning must include people at risk of disengagement.

In both new and older suburbs, planning processes should enable ongoing user and citizen engagement on infrastructure, transport and amenities to promote continual improvement. This should proactively include people experiencing disadvantage and marginalisation such as with people with disability, older Canberrans, young people, people with perceptions of insecurity (such as women, particularly at night), people on low incomes, people with complex needs, and specialist services that support these groups of Canberrans.

There needs to be proactive steps to encourage and grow diversity in neighbourhood voice. Neighbourhood voice should be adequately resourced so that they can include diverse voices reflective of Canberra's demographic change. Information on planning issues must be made more available and accessible to a range of audiences.

Engagement should be intensified in parts of Canberra experiencing stress, deprivation, frayed infrastructure and a lack of community facilities.

A diverse group of community organisations should be engaged to help design, construct and guide community needs assessment work.

Recommendation

The next Territory Plan should contain a commitment to improve engagement with marginalised people most affected by planning decisions and describe mechanisms and resources to do so.

5. Development of inclusive public spaces

Development of inclusive public spaces enabling access for people with disabilities, older people and people on low incomes.

Disability access

Development in Canberra needs to meet and exceed the minimum standards for disability access.

This means we need consistent application of the disability standards at Australian Standard AS1428.1 or above throughout the built environment in new developments. We also need a progressive program of retrofitting older suburbs to address access problem areas identified by a standing group of consumers with lived experience of these barriers.

The standards are a range (from minimum to maximum), including *minimum* features, *higher* features, and *additional* features beyond the standards. The ACT should aim for a mix of these.

For instance, the standards allow for left- and right-hand transfer toilets at different heights. However, toilets that comply with changing room requirements – that is, including a hoist – exceed the standards. Best practice should aim to provide a range of these facilities across Canberra, not only facilities meeting minimum standards.

New policies which affect urban space (from parking, outdoor café seating, the introduction of touch screens and policies around e-scooters and shared paths) need to be reviewed with a disability lens, by disabled people.

Developers need to be encouraged to include people with disability in planning and developing major projects around the city. Consultation around Surgical Procedures, Interventional. Radiology and Emergency (SPIRE) and the Canberra Hospital provides a useful model for similar consultations. ACT Government buildings and shopfronts need to consistently demonstrate best practice.

The ACT must create a mandate for all properties in the ACT built to meet universal design standards. This enables homes to be adapted and accessible to all people regardless of age, disability or other factors. The ACT Government should also support reforms of the National Construction Code (including supporting Option 2 in the National Regulatory Impact Statement as recommended by the Australian Network for Universal Housing Design).

Inclusive development for low-income and vulnerable space-users

A new Territory Plan should prioritise and encourage development of people using public spaces that are inclusive of people who face disadvantage.

For instance, low-income residents are among those who benefit the most from public spaces. Parks can provide a safe space for children to play, and community centres can host civic programs for residents. Squares and plazas can be used for public gatherings and marketplaces, boosting the social and economic quality of life. Sheltered spaces and airconditioned public buildings and foyers can provide free places of refuge for people during heatwaves, storms and other weather events. Features that are hostile to rough sleepers must be prohibited.

Places must be designed to allow young people to gather in places of safety without needing to gather in shopping centres (and spend money) or be perceived as an issue requiring a justice system response.

Recommendation

Improved development should include a commitment to development that is inclusive of people on low incomes, people with disabilities and older Canberrans. Features of this should include:

- An explicit exploration of these issues and commitments in the planning documents
- Incorporation of lived experience into the development planning process
- New residential properties compliant with universal design standards
- The planning, renewal and construction of urban spaces to meet and exceed access standards
- Widespread introduction of inclusive design features
- Prohibition of features that are hostile to rough sleepers.

6. Better integration between planning for spaces, services, facilities and transport

ACTCOSS believes that the ACT needs more integrated approaches to planning in our city that combine and link planning for urban precinct design, public spaces and greenspace, transport, community facilities, community services and affordable housing through a social planning lens.

Recommendation

As part of the next Territory Plan the ACT Government should commit to undertake centrally coordinated work which combines and links planning for housing, affordable housing, urban precinct design and public spaces with planning for greenspace, transport, community facilities and community services. This should be overseen by a social planning unit that reports directly to the Chief Planner with annual reporting to the Canberra community.

7. More social housing

The new planning system must address the lack of affordable housing.

The ACT has a shortfall of around 3,000 social housing dwellings, while almost 1,600 people in the ACT are homeless according to data compiled by Everybody's Home.⁹

For every dollar invested, direct public investment in social housing is estimated to boost GDP by \$1.30.¹⁰

On average, applicants for standard public housing in the ACT are waiting 3.6 years (1,324 days) for a property (as at 1 February 2021).¹¹

The Anglicare *Rental Affordability Snapshot 2020* found that out of 1,201 private rentals, none were affordable for a person on the Disability Support Pension, JobSeeker, Youth Allowance, or Parenting Payment Single without the coronavirus supplement.¹²

42.7% of low-income rental households are in rental stress – that is, spending more than 30% of their gross household income on housing costs.¹³

Housing affordability disproportionately impacts Aboriginal and/or Torres Strait Islander people, people experiencing domestic and family violence and people with mental illness.

The ACT Housing Strategy, first announced in 2018, promises to: create an equitable, diverse and sustainable supply of housing for the ACT community; reduce homelessness; strengthen social housing assistance; increase affordable rental housing; and increase affordable home ownership.

ACTCOSS supports delivery of the ACT Housing Strategy and further investments and planning system reform to ensure public and community housing matches need in Canberra.

The ACT Housing Strategy target of 15% of government land releases for public, community and affordable housing, including infill development and new suburbs, requires an increase in effective land transfers to ACT community housing providers and their empowerment to build more community and affordable housing.

9 Everybody's Home, *Homelessness and housing need in your local community*, ACT heatmaps – total homelessness & social housing need, Everybody's Home website, viewed 18 February 2021, <https://everybodyshome.com.au/heat-maps/>

10 KPMG, *Housing Ministers' Advisory Committee Social Housing Initiative Review*, KPMG, Melbourne, 2012, http://www.nwhn.net.au/admin/file/content101/c6/social_housing_initiative_review.pdf

11 ACT Community Services Directorate, *Social housing waiting list*, Community Services Directorate, Canberra, 2020, viewed 18 February 2021, https://www.communityservices.act.gov.au/hcs/services/social_housing/waiting_lists

12 Anglicare Australia, *Rental Affordability Snapshot 2020*, Anglicare Australia, April 2020, <https://www.anglicare.asn.au/research-advocacy/the-rental-affordability-snapshot>

13 ABS, *4130.0 - Housing Occupancy and Costs, 2017-18*, ABS, Canberra, 2019, Table 21.1, <https://www.abs.gov.au/ausstats/abs@.nsf/mf/4130.0>

We need reforms to land development, planning and zoning to prioritise the timely delivery of this land release program.

The ACT Housing Strategy promises to deliver 260 new public houses through a \$161 million investment. The Governing and Parliamentary Agreement provides for 400 public houses and 600 affordable homes. This must be delivered in a timely manner. Social housing must be built in a range of suburbs close to established amenities and services.

Canberrans living in social housing need to have equality of access to transport, schools, healthcare and other community facilities to prevent social isolation and disadvantage. This also needs to be a factor in planning decisions.

Recommendation

The new planning system (including land development and zoning) should work together to enable the availability of more affordable housing, especially enabling an increase in effective land transfers to community housing providers and ensuring public housing is spread across every suburb in Canberra. Planning decisions should ensure that people living in all forms of social housing (public and community) have equality of access to transport and essential community services.

8. Regulation and incentives to do better

ACTCOSS supports both requirements and incentives for developers to build community infrastructure into new developments, especially in high- and medium-density settings. Developers who include community amenities and infrastructure should be preferenced in the planning, procurement and land sale system.

Recommendation

The new planning system and ACT Government procurement and land sale policies should work to preference and incentivise developers who build community infrastructure (meeting space and community amenities, open space, play space and sports facilities) into new development

9. More community development and facilities

Successful communities are created not only through the placement of physical infrastructure alongside adequate transport, but also by community facilities and services that allow to come together.

The ACT Government should develop a policy framework and investment model for the long-term provision of fit-for-purpose community facilities across the city. This should build on the community facilities audit work done by EPSDD as recommended above.

The policy framework should involve community development workers and volunteers, residents, community councils and community organisations representing communities of interest (e.g. culturally and linguistically diverse communities).

The new planning strategy should include specific investment and services to grow and encourage person-led community development activities in Canberra over the life of the strategy.

Canberra needs a focus on ensuring municipal government-style community development is consistently taking place across the city, building on the successful (but time and scope limited) work by the Linking into New Communities Taskforce and Mingle Program.

This could be achieved via establishment of dedicated teams in every region of Canberra of community development coordinators and workers. Workers would be based within community organisations who could work in partnership with ACT Government agencies and officials to improve community amenity, engagement and cohesion. To achieve this the ACT Government must grow the funding of community development workers alongside expanded physical infrastructure to ensure communities can grow and sustain themselves through resilience, wellbeing and neighbourhood voice.

ACTCOSS supports sustainable ongoing funding for the Community Development Network (CDNet). CDNet is a valuable coordination point for community development activity.

Recommendation

The new planning system should produce more community facilities and community development resources and workers in Canberra. Specifically:

- The ACT Government should develop a policy framework and investment model for long-term provision of fit-for-purpose community facilities across the city
- The new planning strategy should include investment in services to grow person-led community development in Canberra over the life of the strategy, with dedicated resourcing within the ACT Government
- There should be ongoing assured funding for dedicated community development resources like CDNet.

10. Safety, oversight and advocacy

The ACT Territory Planning System should prioritise work on building safety.

The ACT Government's *Housing Choices Discussion Paper* from 2017 acknowledges that 60% of the ACT community surveyed indicated they were reluctant to consider living in higher density housing due to concerns about building design and poor-quality construction.¹⁴

ACTCOSS notes that the government is reviewing its building regulations in response to concerns about issues with building quality in some new denser housing developments around Canberra.¹⁵

We welcome reforms undertaken by Minister Gentleman, including the announcement that a team of public sector certifiers will sit alongside the Government's licencing scheme for property developers. As we noted in our submission to Housing Choices in 2018, ACTCOSS supports breaking the link between developers and building certifiers and calls for the government to fully fund independent certifiers.

Continuing work is needed to ensure ACT building regulation, quality control and oversight is *consistent and high* to ensure that new densified development is sustainable and meets standards for structural safety, environmental sustainability, fire safety, emergency evacuation, disability access, and climate and sound proofing, including in affordable dwellings. Moreover, the ACT Government must work to rebuild trust of Canberrans in the quality of new high- and medium-density developments.

Particular attention must be paid to lessons learnt from other jurisdictions about access and egress by people with disability and older tenants from medium- to high-density residential buildings in a fire or emergency. This should include evacuation planning and structural mitigations like evacuation lifts.¹⁶

Attention should also be paid to consumer rights, protections, reporting mechanisms and the availability of housing advocacy to people who find themselves in rented or purchased housing with maintenance and structural concerns.

14 ACT Government, *Housing Choices Discussion Paper*, ACT Government, November 2017, <https://www.yoursay.act.gov.au/housing-choices>

15 J Fettes, *Minister orders review of building regulations as owners of defect-riddled apartments face \$20m repair bill*, ABC News, 2 March 2018, <http://www.abc.net.au/news/2018-03-01/canberra-apartment-owners-call-for-stronger-building-regulation/9490984>

16 L Wilson, *How Do We Expect People with Disabilities to Evacuate?*, Sourceable, 18 May 2015, <https://sourceable.net/how-do-we-expect-people-with-disabilities-to-evacuate/>

Recommendations

Further work should be undertaken to ensure ACT building regulation, quality control and oversight is consistent and high, especially within denser development.

Work should focus on emergency egress systems from buildings in high- and medium-density developments based on international best practice to ensure vulnerable people can exit buildings in emergencies.

Building regulation reform must be accompanied with attention to and investments in consumer protection and advocacy.