



Submission to the ACT Planning System Review

March 2023

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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

ACT	Australian Capital Territory
ACTCOSS	ACT Council of Social Service
CHP	Community Housing Provider
EV	Electric Vehicle
RZ1	Residential Zone 1
RZ2	Residential Zone 2
RZ3	Residential Zone 3
RZ5	Residential Zone 5
TP	Territory Plan



Introduction

A well-planned city can have a positive impact on all aspects of our lives. It can improve well-being and health, facilitate time saving, increase social and economic opportunities, prevent exclusion and isolation, address housing affordability and promote a strong and sustainable environment.

The current planning system overhaul is an opportunity to improve the lives of all Canberrans, now and into the future. We have the chance to address the shortfalls within our current planning framework and prepare for a more populous Canberra into the future. ACTCOSS welcomes the opportunity to provide advice on the development of our new planning system. If we get this right, we will improve affordability, inclusivity, and sustainability for all.

Up till now, we have failed to adequately plan for the needs of our city. Inequality in the ACT continues to rise. Many Canberrans are struggling to pay their rent and put food on the table. Canberra continues to be the most expensive Australian city for renters,¹ and the jurisdiction with the highest rate of rental stress among low-income renters.² This is pushing people out of the private rental market, sometimes into the streets, and putting more pressure on the social housing system and community organisations.

For people on low incomes with accessibility requirements, the situation is even harder. Not only are they wrestling with a low vacancy rate, they are also limited by the number of suitably built properties for their disability or circumstances.

Thanks to inadequate investment in public housing and the private market, our public housing waitlist has ballooned. As of January 2023, 3,169 applicants were on the waitlist for public housing.³ Those on the priority housing waitlist are waiting 324 days on average to be housed, while those on the standard housing waitlist can be left waiting nearly 5 years.⁴ The ACT's public housing stock is at its lowest level in the past decade.⁵

We cannot sit back and let the situation keep deteriorating. We can make changes to the planning system that, if implemented now, will improve housing affordability and

¹ Productivity Commission, [Report on Government Services](#), Productivity Commission, 2023, accessed 24 January 2023; ACTCOSS, [2022 ACT Cost of Living Report: Tracking changes in the cost of living for low-income households in the Australian Capital Territory](#), ACTCOSS, May 2022, pp 22-23, accessed 27 February 2023; Domain, [March 2022 Rental Report](#), Domain website, n.d., accessed 27 February 2023.

² Productivity Commission, [Report on Government Services](#); ACTCOSS, [Urgent action needed to address ACT's worsening housing and homelessness crisis](#) [media release], ACTCOSS, 24 January 2023, accessed 23 February 2023.

³ ACT Government, [Waitlist and processing times](#), ACT Government Housing website, 2023, accessed 16 February 2023.

⁴ ACT Government, [Waitlist and processing times](#).

⁵ Productivity Commission, [Report on Government Services](#).



accessibility for years to come. The new Territory Plan (TP) will set the housing agenda for the next decade and beyond. Let's make sure it sets us up for a denser, more affordable city for all to enjoy.

Recommendations

Social Planning

- The new TP should focus on social issues affecting vulnerable Canberrans.
- The new outcomes focused approach should emphasise social policy outcomes including affordability, accessibility, social and community infrastructure and amenities, green spaces, and spaces that are safe, inclusive, and well-used by disadvantaged and marginalised groups.
- The ACT Government should establish a social planning unit to advocate for the social needs of vulnerable Canberrans.
- The new TP should embed targeted engagement and community co-design into the planning system.

Zoning and densification

- Zoning regulations should be amended by either:
 - Upzoning RZ1 to RZ2, and RZ2 to RZ3; or
 - Allowing separately titled dual occupancies and other medium density dwellings to be built in *all* residential zones. At the very least, separately titled dual occupancies should be allowed in RZ1. These must be able to be subdivided before construction.
- All blocks close to major transit hubs should be re-zoned as high density (RZ5) to allow for more housing close to public transport.
- Increased medium density housing will require more investment in infrastructure and public spaces.

Housing affordability and supply

- Ensure public housing is built close to public transport and community hubs to provide easy access to transport and services.
- Provide financial support to community housing providers to enable them to deliver much needed community housing. This will require affordable land (an economically viable land release rate that allows providers to operate), and reduced land taxes and rates.
- 15% of build-to-rent developments should be designated as affordable rentals.
- The ACT Government should consider mandating or incentivising large builds to offer a percentage of dwellings as affordable housing.



Accessibility

- Make universal design standards mandatory under assessment requirements in the residential zones policy. As a minimum, the standards should be equivalent to the Livable Housing Design Silver Level. As an alternative, universal design standards should be a consideration under the assessment outcomes.
- Every zone policy should include a policy outcome related to accessibility and inclusivity.
- Accessibility should be an explicit Design Criteria in both the Housing and Urban Design Guides.

Electric vehicle charging facilities

- The new TP must ensure that charging stations are available in multi-unit complexes and co-located in community facilities.

Social planning

Addressing social issues in Canberra

Social planning aims to address social objectives and issues in the community. While planning decisions affect everyone, some vulnerable groups can be significantly impacted by planning decisions. These groups include people with disability, people on low-incomes, Aboriginal and Torres Strait Islander peoples and renters. These groups are often forced to live in the outer suburbs with fewer work opportunities and more limited access to services.

If the ACT Government is committed to their vision of an equitable Canberra as outlined in the ACT Planning Strategy 2018 (Planning Strategy),⁶ then planning decisions need to focus first and foremost on vulnerable groups. The new TP must not forget or sideline their needs.

The new TP should work to address social issues like inequality, social exclusion, housing affordability, accessibility, and improved community infrastructure and amenities.

⁶ ACT Government, [ACT Planning Strategy 2018](#), ACT Government, 2018, p 4, accessed 16 February 2023.



An outcomes-focussed approach done right

The shift to an ‘outcomes-focussed’ approach in the draft new TP is welcome, but the desired policy outcomes should be reconsidered. While it is difficult to clearly summarise the draft new TP’s policy outcomes given they change based on zone and district, there is an insufficient focus on social policy issues affecting vulnerable Canberrans. Looking at the residential zones policy, for instance, there is no mention of affordability, accessibility, or inclusivity in the policy outcomes.

ACTCOSS urges the ACT Government to rethink the proposed policy outcomes to include a greater focus on the social needs of vulnerable Canberrans. Policy outcomes should be aimed at housing affordability, accessibility, social and community infrastructure and amenities, green spaces, and public spaces that are safe, inclusive, and well-used by disadvantaged groups.

Social planning unit

The ACT Government should establish a social planning unit within the Environment, Planning and Sustainable Development Directorate to advocate for key social objectives. Without a team fighting for social issues, they will often go unconsidered. A dedicated team focussed exclusively on social planning will ensure that gaps are not missed within the planning system and that the most vulnerable Canberrans are not forgotten.

There is precedent for social planning units both around Australia and internationally. One example is the Social Planning Team within the Hobson Bay City Council.⁷

Social planning units are focused on addressing social issues in their community. They play an important role advocating for priority populations. They review specific development projects while keeping social objectives in mind, as well as ensure issues facing vulnerable groups are considered during policy development. They can be a voice in the room advocating for projects that prioritise and incorporate community infrastructure. Without them, developments and services would be designed with less thought given to disadvantaged groups. Crucial infrastructure developments could be missed.

Inclusion and fairness take work. By having a dedicated social planning team, social issues are kept on the agenda.

⁷ Hobson Bay City Council, [Social policy & planning](#), Hobson Bay City Council website, n.d., accessed 13 February 2023.



Consultation

Part of the new social planning unit's role, and the planning directorate more generally, should be effective, active engagement with the community. They should have a specific mandate to consult with vulnerable and disadvantaged Canberrans on their needs. Without proactive consultation with vulnerable groups, future planning decisions could work to further increase disadvantage and inequity in Canberra. We need to have targeted engagement and embed community co-design into our planning system.

Zoning and densification

Restrictive zoning rules

In the ACT, our housing supply is severely limited by zoning rules. With over 80% of residential areas essentially restricted to single dwelling builds,⁸ we find ourselves in a situation in which we don't have enough housing, and what we do have is unaffordable for many residents. We have a significant lack of well-located medium density housing. People are being pushed to fringe suburbs to afford a place to live, increasing commute times, travel costs and emissions, and restricting access to services.

Canberrans have made it clear that they want more affordable, medium density housing close to services.⁹ Our population is growing, and we cannot continue to keep spreading outwards. It's unsustainable and not what people want.

On paper, the ACT Government has accepted that Canberra needs to become denser. This is shown by their commitment to being a 'compact and efficient' city,¹⁰ and their promise to deliver 'up to 70% of new housing within our existing urban footprint'.¹¹ They clearly want to increase housing choices, but they are not putting the right policies in place to make that happen.

If we are going to provide a variety of well-located, affordable housing into the future, we must reform our zoning regulations.

⁸ RZ1 makes up 81% of residential land. Dual occupancies cannot be separately titled in RZ1, significantly reducing demand for them in RZ1, see ACT Government, [Housing Choices Discussion Paper](#), ACT Government, November 2017, pp 29, 41, accessed 14 February 2023.

⁹ ACT Government, *Housing Choices Discussion Paper*, p 1; ACT Government, *ACT Planning Strategy 2018*, p 28.

¹⁰ ACT Government, *ACT Planning Strategy 2018*, pp 4-5.

¹¹ ACT Government, *ACT Planning Strategy 2018*, pp 38, 41.



Missing Middle Canberra

ACTCOSS is a supporter of the [Missing Middle Canberra](#) coalition which advocates for more medium density housing in the ACT. We support the recommendations put forward in their submission.

Zoning changes

As the 2022 review into the National Housing and Homelessness Agreement states, '[p]lanning and zoning regulations can both facilitate and constrain new housing supply, affecting affordability'.¹² Currently, 81% of residential land in the ACT sits within Residential Zone 1 (RZ1)¹³ which the draft new TP states is for 'low-density residential neighbourhoods'. A further 11.5% sits within Residential Zone 2 (RZ2)¹⁴ which is aimed at achieving 'a mix of low to medium density housing'. There are around 97,000 blocks in RZ1 and 9000 in RZ2.¹⁵ Together they make up over 92% of all residential land. It is promising to see that the ACT Government is considering changes to increase density in RZ2, but without changes to RZ1, we will not see the densification that our city requires.

There are a few options the ACT Government could take when it comes to changing the residential zones policy. The first option would be to upzone RZ1 to RZ2, and RZ2 to RZ3. This is ACTCOSS's priority policy. The other option would be to allow separately titled dual occupancies and other medium density dwellings in *all* residential zones, including RZ1. This should include permitting apartments in RZ1.

In addition, all blocks close to major transit hubs, say up to 500m or 700m away, should be re-zoned as high density (i.e., RZ5) to allow for more housing near public transport.

At the very least, *separately titled* dual occupancies should be permitted in RZ1. Like with zones RZ2–RZ5, subdivision should be allowed before construction.

A slow, dispersed change

We should pause for a moment and acknowledge that, while our proposed zoning changes may seem like they will dramatically and rapidly change Canberra, change

¹² Productivity Commission, [In need of repair: The National Housing and Homelessness Agreement](#), Productivity Commission, August 2022, p 487, accessed 15 February 2023.

¹³ ACT Government, [Housing Choices Discussion Paper](#), p 41.

¹⁴ ACT Government, [Housing Choices Discussion Paper](#), p 41.

¹⁵ Missing Middle Canberra, [Zoning Explainer \[PDF 40.11MB\]](#), Missing Middle Canberra, n.d., p 6, accessed 13 February 2023.



is going to be slow. Unlike spot zoning in which only specific blocks are upzoned, mass upzoning will create much slower, dispersed change.¹⁶

Higher density in our inner suburbs does not mean Canberra has to lose its garden city character. One could argue that large, modern, single dwellings can affect the character of Canberra all on their own.

Auckland and New Zealand

In 2016, zoning rules in Auckland changed to allow three quarters of residential land to be used for medium density housing. They have already seen a huge increase in the amount of housing being built. Over a 5-year period, Auckland built approximately 20,000 new dwelling, nearly the equivalent of 4% of its housing stock,¹⁷ and attached housing has grown at a rapid rate.¹⁸ Rental and housing prices have grown at a slower rate than other cities around New Zealand.¹⁹ For example, over a one-year period from June 2021, rent grew by less than 2% in Auckland, while growing by 8% nationally.²⁰

Following this impressive result, New Zealand's federal government changed zoning policies to allow medium density housing to be built throughout their five major cities. Specifically, three dwelling of up to three stories are now permitted on existing blocks.²¹ They also now allow residential buildings of up to six storeys to be built within approximately 800m of rapid transit stations. These policies both had bipartisan support.²²

Increased community infrastructure

If the ACT Government amends zoning policies to permit medium density housing throughout the ACT, there must be adequate investment in community infrastructure and public spaces in response.

¹⁶ Missing Middle Canberra, *Zoning Explainer*.

¹⁷ R Greenaway-McGrevy and PCB Phillips, 'The Impact of Upzoning on Housing Construction in Auckland', *EliScholar*, 2022, 2330:1–42, p 17, doi: <https://elischolar.library.yale.edu/cowles-discussion-paper-series/2689>.

¹⁸ Greenaway-McGrevy and Phillips, 'The Impact of Upzoning on Housing Construction in Auckland', p 6; R Greenaway-McGrevy, [New Zealand's bipartisan housing reforms offer a model to other countries](#), Brookings website, 2022, accessed 13 February 2023.

¹⁹ M Maltman, [Auckland](#), One Final Effort website, n.d., accessed 16 February 2023.

²⁰ Productivity Commission, *In need of repair*, p 483.

²¹ Ministry of Housing and Urban Development, [Enabling housing density](#), Ministry of Housing and Urban Development website, n.d., accessed 27 February 2023; Greenaway-McGrevy, *New Zealand's bipartisan housing reforms offer a model to other countries*.

²² Greenaway-McGrevy, *New Zealand's bipartisan housing reforms offer a model to other countries*.



This is not only relevant to new residents; it will also help to bring current residents on board with changes in their neighbourhood.²³ Restricting medium density housing in inner and middle suburbs is often done to appease the existing community. If they can benefit too, then they are more likely to accept increased densification. If higher density means better investment in roads and therefore reduced congestion, new and improved social infrastructure, and more investment in green spaces, everyone can benefit from these changes.²⁴

A more compact city means people will live closer to jobs and facilities, and will spend more time walking, biking, and catching public transport, reducing congestion. As a community we will cause less environmental destruction, both through reduced emissions and through less urban sprawl.²⁵ Higher density suburbs will also spur investment in cafes, restaurants, and entertainment for the growing customer base to enjoy.²⁶

Improving infrastructure in established neighbourhoods will be cheaper than the cost of building new infrastructure in greenfield developments.²⁷ While some infrastructure will have to be added and upgraded, it will be significantly cheaper than starting from scratch.

Housing affordability and supply

A lack of supply

Australia is in a housing crisis. This is in part due to our housing supply responding poorly to changes in demand. When demand rises, rather than building more housing, house prices and rents increase.²⁸

One culprit for this supply-side failure is restrictive zoning regulations.²⁹ As discussed above, strict zoning rules that cover most of the ACT make it difficult to build more housing in existing inner and middle ring suburbs. Because the number of

²³ Productivity Commission, *In need of repair*, p 496.

²⁴ Productivity Commission, *In need of repair*, p 485-486; E Guerra and M Li, 'The relationship between urban form and mode choice in US and Mexican cities: A comparative analysis of workers' commutes', *Journal of Transport and Land Use*, 2021, 14(1):441-462, doi:<http://dx.doi.org/10.5198/jtlu.2021.1789>.

²⁵ M Maltman, [How to make housing affordable in Australia](#), One Final Effort website, n.d., accessed 16 February 2023.

²⁶ X Li, 'Do New Housing Units in Your Backyard Raise Your Rents?', *Journal of Economic Geography*, 2022, 22(6):1309–1352, doi:<https://doi.org/10.1093/jeg/lbab034>, p 3; Missing Middle Canberra, *Zoning Explainer*, p 8.

²⁷ Missing Middle Canberra, *Zoning Explainer*, p 7.

²⁸ Productivity Commission, *In need of repair*, p 478; Maltman, *How to make housing affordable in Australia*.

²⁹ Y Sayin, [The economic costs of land use regulations](#), DC Policy Center website, 2019, accessed 27 February 2023; Productivity Commission, *In need of repair*, p 491-492.



dwellings is in essentially 'capped' by zoning rules, supply is restricted, and prices increase.³⁰

To address our housing affordability crisis, we need to build more housing. To achieve this, we must allow higher density builds to be constructed in inner and middle suburbs close to facilities and community hubs.

Governments often focus too much of their efforts on demand-side solutions. While this is important, it will not create the sweeping changes that supply-side policies can. Rent reductions can go a lot further to reducing rental stress than subsidies.³¹ Everyone struggling with housing affordability can benefit from a boost to supply, whereas demand-side policies only affect the people who qualify for them e.g., financial assistance or first home owner grants.³²

The current housing affordability crisis is disproportionately affecting people on low-incomes, Aboriginal and Torres Strait Islander peoples, people with mental illness and those experiencing domestic and family violence. The most vulnerable people in our community are also often renters. If we can grow our housing supply, rental prices will decline, and this will help reduce the number of low-income households experiencing rental stress.

That being said, lifting incomes and financial support for low-income households is also important.

Public housing

Rates of public housing in the ACT have been declining over the past decade despite a growing population.³³ Waitlists and wait times are growing, with people in dire situations unable to be housed. By increasing the public housing stock, people at risk of homelessness could be housed, and the number of people experiencing rental stress in the private market could reduce.

While increasing supply in the private market will help to address the housing affordability needs of many Canberrans, for some, they will still require access to public housing, especially those at risk of homelessness. People in the most precarious financial and living situations significantly reduce their risk of homelessness when they have access to public housing.³⁴

³⁰ Productivity Commission, *In need of repair*, p 467.

³¹ B Coates and T Crowley, [How to make housing more affordable Submission to the parliamentary inquiry into housing affordability and supply in Australia](#), Grattan Institute, September 2021, p 16, accessed 13 February 2023.

³² Maltman, *How to make housing affordable in Australia*.

³³ Australian Institute of Health and Welfare, [Housing assistance in Australia summary: ACT](#), Australian Institute of Health and Welfare, 29 June 2022, accessed 27 February 2023.

³⁴ D Prentice and R Scutella, [What are the impacts of living in social housing?](#), Infrastructure Victoria, May 2018, p 5, accessed 27 February 2023.



Where possible, the ACT Government should build public housing close to public transport and community hubs to provide easy access to services.

Community housing

ACTCOSS welcomes the inclusion of community housing as a permissible land use in all residential zones and in the community facility zone. We also support the ACT Government's previous commitment to earmark 15% of land releases for public, community, and affordable housing.³⁵

If these changes are going to be effective, the ACT Government must ensure that they release land at an economically viable rate. Otherwise, community housing providers (CHPs) will not be able to operate or deliver affordable housing.³⁶ In addition, CHPs should be given reduced land taxes and rates. If this is done, CHPs will be able to use their expertise to provide struggling Canberrans with another housing choice and reduce rental stress.

Build-to-rent

Build-to-rent developments provide another housing choice for renters in Canberra. ACTCOSS welcomes the inclusion of build-to-rent as a permissible land use in all residential zones and commercial zones.

ACTCOSS proposes that the definition of 'build-to-rent' be slightly altered to require 15% of dwellings to be affordable rentals. The ACT Government has indicated they will target support for builds that achieve this 15% goal,³⁷ but have not committed by putting it in the draft new TP. Instead of stating 'the owner of a build-to-rent development *may* provide some or all the dwellings as affordable rental dwellings', it should become a *requirement*.

Inclusionary zoning

The ACT Government should consider mandating or incentivising large builds to offer a percentage of dwellings as affordable housing. This is called inclusionary zoning.

³⁵ ACT Government, *ACT Planning Strategy 2018*, pp 1, 16.

³⁶ ACTCOSS, [Social housing boost needed under ACT Government's land supply and release program](#) [media release], ACTCOSS, 27 April 2022, accessed 13 February 2023.

³⁷ ACT Government, [What does Build-to-Rent look like for the ACT?](#), ACT Government website, n.d., accessed 24 February 2023.



All new housing improves housing affordability

All new housing helps to lower housing and rental prices.³⁸ While public and other affordable housing is important, boosting public housing is not the only policy required to increase affordability for low-income households. As a priority, we must change zoning regulations to allow for a greater supply of housing in the ACT.

All new housing has a positive impact on general affordability due to an effect called *movement chains*.³⁹ As people move into new builds, they vacate their previous housing, leaving it available for someone else. That new person vacates their previous dwelling, which is then freed up, and so on. This means that all housing, including market-rate housing, can moderate housing prices for lower-income households and neighbourhoods, not just public and affordable housing.

Accessibility

The ACT population is aging, and the number of people with disability is growing. The new TP must ensure that all Canberrans have access to services, facilities, public spaces, and affordable housing that meets their needs, regardless of disability, age, or any other consideration.

Universal design standards

The ACT Government should make universal design standards mandatory for all housing under the assessment requirements in the residential zones policy. As an alternative, universal design standards should be a consideration under the assessment outcomes. As a minimum, these should be equivalent to the Livable Housing Design Silver Level.⁴⁰

While the preliminary Housing Design Guide highlights that '[u]niversally designed apartments are safer, inclusive and easier to access and use for users with impairments', there should be an explicit Design Criteria related to universal design standards under theme 3.

Although there is some mention of the *Australian adaptable housing standard* in the technical specifications for dwellings like supportive housing and retirement villages, these are not wide reaching and are optional. We need a universal design policy across the board.

³⁸ Productivity Commission, *In need of repair*, p 478; C Bratu, O Harjunen and T Saarimaa, 'City-wide Effects of New Housing Supply: Evidence from Moving Chains', *VATT Institute for Economic Research*, 2021, 146:1-21, doi: <https://ssrn.com/abstract=3929243>.

³⁹ Productivity Commission, *In need of repair*, pp 478-479.

⁴⁰ Livable Housing Australia, [Livable Housing Design Guidelines: LHA Silver](#), Livable Housing Australia website, n.d., accessed 27 February 2023.



Public spaces and infrastructure

Public spaces, facilities and infrastructure should be accessible to all Canberrans and visitors.

The ACT Government should take a social model of disability approach to accessibility.⁴¹ It is our society and environment that disable people and create barriers to use, not an individual's disability. By removing and not creating these barriers in the first place, we can improve equity in the ACT and give people with disability more control and independence over their lives.⁴²

Whether it be a community centre, shopping centre, or sporting facility, planning regulations and decisions should place the onus on developers to take responsibility for creating accessible environments. We should be creating a new culture in which this is the norm and not an afterthought.

Within the new TP and ancillary documents, there should be a greater emphasis on accessibility and inclusivity. It is encouraging to see that accessibility is mentioned in the community facility zone, but we should not limit these aspirations to community facilities. Every zone policy should include a policy outcome related to accessibility and inclusivity.

The Urban Design Guide should also place greater emphasis on accessibility and usability for all, especially under theme 3 – building design and built form. Accessibility should be an explicit Design Criteria.

Electric vehicle charging facilities

At present, ACT Government schemes to increase electric vehicle (EV) uptake disproportionately favour high-income earners who are likely to transition regardless.⁴³ The government needs to better target their limited resources to assist lower-income earners to transition to more sustainable technology.

One place to target funding is through charging facilities. As EVs become more affordable and accessible to low-income households, one of the barriers that will keep them out of the market will be charging infrastructure. Many low-income households live in multi-unit complexes and/or are renters. The new TP should

⁴¹ See People with Disability Australia, [Social model of disability](#), People with Disability Australia website, n.d., accessed 27 February 2023.

⁴² Australian Federation of Disability Organisations, [Social Model of Disability](#), Australian Federation of Disability Organisations website, n.d., accessed 23 February 2023.

⁴³ J Nguyen, 'The Adoption of Zero-Emissions Vehicles by Low-Income Consumers in California: An outcome evaluation of the clean vehicle rebate project', *San Jose State University Master's Projects*, 2020, Spring 5-2020:1-76, doi:<https://doi.org/10.31979/etd.n6a2-y5cp>; Y Vidyattama, D Sinclair, J Schirmer and R Tanton, '[What would it take to get Australians to buy electric cars? Canberra provides a guide](#)', *The Conversation*, 8 April 2022, accessed 27 February 2023.



ensure that charging stations are available in multi-unit complexes and co-located in community facilities. This is a good use of funding. It will allow low-income earners and community organisations to transition to EVs more easily.

Before rolling out new charging infrastructure, the government must consult with disability groups on accessibility requirements. Charging bays must be wide enough to provide wheelchair access, and screens and cables must be at an appropriate height.⁴⁴ Charging stations should be accessible and useable by all members of the community who want to use them.

⁴⁴ P Brewer, '[The needs of disabled drivers were ignored in ACT government's submission on EV adoption](#)', *The Canberra Times*, 2 March 2023, accessed 2 March 2023.

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