



5 September 2014

Community Engagement team  
Chief Minister, Treasury and  
Economic Development Directorate  
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Dear Community Engagement Team

### **Omnibus Territory Plan Variation**

The Inner South Canberra Community Council (ISCCC) welcomes the opportunity to comment on four of the areas in South Canberra, which are included in the Omnibus Draft Territory Plan Variation. It has significant concerns with what is being proposed at each of these sites: Gowrie Court (1), the Stuart Flats (2), the Red Hill Shops (3) and in Jerrabomberra Avenue, Narrabundah (4).

We recognise the need to re-develop sites (1), (2) and (3) but several aspects of the current proposals should be amended if the proposals are to gain community support. Reflecting community feedback, we are making six recommendations for consideration.

- 1. The RZ5 high density residential proposed for sites (1), (2) and (3) is unacceptable.***
- 2. We recommend sites (2) and (3) should be re-zoned RZ3 and site (1) re-zoned as RZ2.***
- 3. Each of the three sites should be re-developed under the control of a Master Plan and not sold off independently, in bits and pieces.***
- 4. At least the same area of open space currently available at each site must be included in any re-development.***

5. *There should be a timetable for all to see, so that residents and local community know when actions, such as demolition and re-housing will be made.*
6. *CZ6 zoning remains on Section 34 Blocks 12 & 13, Narrabundah.*

The attachment provides full details of the reasoning underpinning our suggestions.

Finally, we would like to express our appreciation to the Government and relevant officers for embarking on what has been an extensive and well-organised consultation process in relation to these proposals.

We would be happy to discuss any of these issues in more detail with the government, at any time.

Yours sincerely

(Signed)

Gary Kent  
President

# ISCCC Submissions Omnibus Territory Plan Variation

## **1. Background**

### ***Value of consultation process***

Firstly, we would like to commend the government for embarking on the extensive consultation process on these proposals. All the meetings our members attended were well organised. It was very valuable for the community to hear what was being proposed on the four sites and we are encouraging the government planners to act on the comments by the local residents to improve the Territory Plan variations.

### ***Some principles***

1. We recognise and support the need for Gowrie Court and the Red Hill and Stuart Flats to be re-developed. We would support an appropriate 'social mix model' in the re-development.
2. We believe that the development and redevelopment of all areas must foster high quality living environments and maintain and contribute to Canberra's landscape character.
3. The areas must be developed to meet long term needs, not just to address short term funding pressures on the government.
4. The sites should not be divided up and sold as individual allotments. There should be a Master Plan for each site to regulate building design and construction, and the overall site infrastructure, including parking and gardens spaces.
5. All developments should be consistent with the *2012 ACT Planning Strategy*.
6. There should be no loss of urban open space in any of the re-developments.

### ***Residents***

Planning and development are complex processes, particularly when large numbers of people are involved, as is the situation at Gowrie Court and the Red Hill Flats and Stuart Flats.

The welfare of the existing residents must be properly accommodated, particularly when they are moved to new homes and in catering to those who have special needs.

A review of the literature indicates that a social mix usually leads to an improvement of the urban fabric and the housing stock, but this has to be

managed properly. In neighbourhoods where social mix has evolved over time the outcome is likely to be more positive than where it has been introduced through government intervention. So moving the residents from Gowrie Court and the Stuart and Red Hill Flats, represents a really hard challenge, because networks and friendships in these places have been built up over many years. Consequently, there needs to be sympathetic consultation with residents and high quality urban planning for their new homes, so that people's lives are not severely disrupted when they are re-housed.

- *There should be a timetable for all to see, so that residents and local community know when actions, such as demolition and re-housing will be made.*

## **2. Planning**

### **Gowrie Court**

The current zoning for Section 62 is RZ1, suburban, where the housing is low rise and predominantly single dwelling and low density in character. However, the Gowrie Court buildings are 3 stories and are consistent with RZ4 (Medium density residential zone, 25-60 dwellings per hectare). At present there are 72 dwellings and the area of Section 62 is 1.3775ha. This means the present dwelling density is 52.3 dwellings/ha.

However, all of the surrounding dwellings are zoned RZ1 and are mostly single storey. Any future development should rectify the anomaly of a medium density island in a sea of RZ1 dwellings. At most any re-development should be RZ3, to maintain the character of established single dwelling housing in the area.

The current proposal is to rezone the land from RZ1 (low density) to RZ5 the highest residential zoning in Canberra, maximum height 21.5 m, mostly six or eight storeys and a dwelling density of more than 60 /ha.

A change to RZ5 would be inconsistent with the 2012 ACT Planning Strategy; it is not near a town or group centre or on a major transit route and would be completely out of place with the surrounding homes.

Even rezoning to RZ4 would be unsatisfactory because the Brumbies site in Griffith is zoned RZ4 and Minister Corbell used his call-in powers to have the development approved, even though it did not comply with the current planning regulations. For example:

- *The dwelling density is 78 dwellings per hectare, well above the upper limit of the 60/ha specified in the ACT Spatial Plan*

- *The Parking and Vehicular Access Code requires 33 visitor spaces. Only 9 have been provided on site.*
- *Rule R39 of the Multi-Unit Development Code for RZ4 requires sufficient space for planting, particularly trees with deep root systems. This is not possible on that site, where the whole of the 1.68 ha is covered by built form.*

So even if the Gowrie Court site was re-zoned as RZ4 this would not necessarily provide a satisfactory outcome.

The omnibus draft variation, purports to “create a more compact and efficient city that offers employment opportunities, which is an important part of the ACT Government’s initiatives to stimulate the ACT economy.”

It was never explained at the consultation meetings how a site such as Gowrie Court would or could generate employment opportunities, or why RZ5 zoning was necessary.

Many people at the community meetings were of the opinion that as soon as RZ5 is in place the government would be able to build whatever it thought would generate the most money, even if this meant constructing buildings that are out-of-character with the neighbourhood.

No commitment was given to a master plan development of the whole site and the sketch plans showing possible designs, were just that, only possibilities.

Finally, there should be no encroachment onto the adjacent PRZ1 Urban Open Space land of Jerrabomberra Oval (Narrabundah Section 64 Block 4). The Griffith Narrabundah area has lost over 14 ha of open space in the past 20 years. We should treasure what we have because if it goes it will never return and in this proposal, the landscape round the oval would be seriously degraded if this area was re-zoned.

- *The site should be re-developed under the control of a Master Plan and not sold off independently, in bits and pieces.*
- *The RZ5 high density residential is completely unacceptable. Block 59 should be re-zoned R2 and the urban open space should remain.*
- *The urban open space from Section 64 should not be incorporated into the development.*

### **Stuart Flats**

The current zoning for this complex is RZ2. This zone should: *Provide for the establishment and maintenance of residential areas where the housing is low*

*rise and contains a mix of single dwelling and multi-unit development that is low to medium density in character particularly in areas close to facilities and services in commercial centres.*

There are currently 146 dwellings on 12 Blocks over an area of 2.16 ha in Section 39. This amounts to 68 dwellings per hectare, well in the high density category. The current proposal envisages development of an area of 3.14 hectares, of which 0.65 ha is Urban Open Space. Therefore if the same number of dwellings is built on the proposed area, the dwelling density would be 46 dwellings per hectare. This scenario would result in a medium density development.

One of the challenges of the site is the topography. This affected the original development, because the buildings are sited parallel to the contours and consequently solar access is very poor for most of the units.

If RZ5, high density residential is adopted, then the topographic challenge would have to be tackled. In theory, it would be within the code to build eight story towers on top of the knoll, near the Telstra building. This may provide good income for developers, but in terms of good planning, a tower block that dominates the landscape and overlooks all the dwellings around the site is not acceptable. Furthermore, providing adequate solar access for all the residents would be a huge and costly problem. At the community meeting it was stated that two levels of underground parking would be possible. We consider this to be somewhat fanciful because of the hardness of the rock at the knoll. It protrudes the landscape for a very good reason. The higher the buildings, the harder the problems are for solar access.

Furthermore a high residential density covering a larger area and with increased building heights would be highly discordant with the existing 'garden city' townscape.

- **The RZ5 high density residential zone is completely unacceptable. The 12 blocks in Section 39 and the three blocks in Section 43 should be combined and re-zoned as RZ3.**
- **The site should be re-developed under the control of a Master Plan and not sold off independently, in bits and pieces.**

*RZ3 'Provides for the establishment and maintenance of residential areas where the housing is low rise and predominantly medium density in character and particularly in areas that have good access to facilities and services and/or frequent public transport services.*

If this zoning was adopted, the low rise dwellings could be at the edges of the site and this zoning could also blend in well with the surrounding. This zoning would also permit better conditions for good solar access than provided by either RZ4 or RZ5.

This small park on the knoll is a very valuable resource, and contributes to the local neighbourhood. It must either be retained, or replaced by Urban Open Space land no smaller in area than the existing area; and located within the proposed development area, and not moved to another area of Griffith or to another suburb. It should also be available to everyone with access available to everyone.

- **The urban open space must either be retained or else replaced with at least an equivalent area on the site; it must be accessible to the public.**

### ***Red Hill Flats***

The site occupies approximately 5 hectares. It contains more than half a hectare of open space and is currently zoned RZ2 *Suburban Core Zone*. There are 144 dwellings, housing approximately 150 people. The overall density is therefore 28 dwellings per hectare, which is consistent with a low-medium density rating.

The proposal is for the site to be re-zoned as RZ5, *High Density Residential Zone*. This zoning is inconsistent with the 2012 ACT Planning Strategy; it is not near a town or group centre or on a major transit route and would be completely out of place with the surrounding homes.

The proposal could create a 'high density' development rather than a 'high quality' development, which would increase traffic flows and could destroy the landscape values of the area. RZ5 has an unspecified plot ratio and although the maximum height in multi dwelling development code is 21.5 metres there are several examples in Canberra where this height has been exceeded. It could result in double the size of the current development, and approximately 400 more people. As a result the issues in Dalrymple Street – where there has been no effective solution to date – will be exacerbated.

We were disappointed that no commitment was made to re-develop the area under the umbrella of a master plan and no reason was provided as to why RZ5 was chosen as a zone for the architects to work with.

Many people at the meeting felt that RZ5 was being proposed because the Government would be able to build whatever it wanted as long as was residential.

We recommend that the site be re-zoned as RZ3, where the housing is low rise and predominantly medium density in character and particularly in areas that have good access to facilities and services and/ or frequent public transport services. The maximum height is 9.5m and the built form can comprise up to 2 storeys plus abasement and attic.

- **The RZ5 high density residential zone is completely unacceptable. The area should be re-zoned RZ3 where the housing is low rise and predominately medium density in character.**
- **The site should be re-developed under the control of a Master Plan and not sold off independently, in bits and pieces.**
- **At least the same area of open space currently available must be included in any re-development.**

***Narrabundah, Section 34 Blocks 12 & 13, Jerrabomberra Avenue***

'Social Sustainability' in the Statement of Strategic Directions in the Territory Plan is a very important attribute.

Clause 1.18 states that "Provision will be made for a comprehensive range of readily accessible community, cultural, sporting and recreational facilities, distributed according to the varying needs of different localities and population groups."

We consider that allowing blocks of flats to be built next to the Harmonie German Club and the Inner South Vets would seriously restrict these facilities operating to their full capacity. Complaints from residents in other parts of Canberra, such as Press Club in Barton and Gryphons at Griffith shops have restricted music from these venues.

Any proposed residential development adjacent to the Harmonie German Club would eventually restrict its program of live music.

It is one of the last remaining venues that have live music regularly in the Inner South Canberra area. Good planning would ensure that facilities for live music continue to be available and that imposing adjacent residential development would restrict or stop performances.

We therefore recommend that the existing **CZ6 zoning remains on Section 34 Blocks 12 & 13, Narrabundah. Rezoning to RZ3 has the potential to lead to the decline and possible closure of the Harmonie German Club and Inner South Vets.**