



Environment, Planning and Sustainable
Development Directorate
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GNCA Submission to ACT Planning System Review and Reform Project

Dear ACT Planners

The Griffith Narrabundah Community Association has a membership of over 400 people and represents the residents of Griffith that live south of Canberra Avenue, and those of Narrabundah that live west of Sturt Avenue or Jerrabomberra Avenue. Residents of Griffith living north of Canberra Avenue are represented by the Kingston Barton Residents Group, while residents of Narrabundah east of Stuart Avenue or Jerrabomberra Avenue are represented by the Old Narrabundah Community Council.

The GNCA recommends that:

- 1. All future development in the GNCA area is consistent with the values expressed by residents of the area and outlined in this submission.**
- 2. In RZ1 zones housing redevelopment should be restricted to low density single dwelling separate houses of no more than two storeys, well set back from the street, and with ample permeable space for deep rooted trees.**
- 3. The Government should put more effort into maintaining the well treed streetscapes of Griffith/Narrabundah, replacing as necessary dead or diseased and dying trees with trees of the same or an appropriate substitute species (even if not native).**
- 4. The Government establishes a dedicated agency, and fund it appropriately, to plant at least the 36,000 trees per year required to meet the 30% canopy-cover target.**
- 5. The Government revises and redrafts DV369, to ensure adequate planting areas are available on blocks, and encourages owners to plant trees.**
- 6. The Government provides more support to assist the regeneration of Manuka so it can keep its place as one of Canberra's leading retail, hospitality, and entertainment centres.**
- 7. The Government develops a long-term plan for the Manuka/Kingston area, identifying likely and possible changes to the area over the next 30 to 40 years.**

8. **That EPSDD immediately initiates reviews of**
 - (1) **The impact and outcomes of the Mr Fluffy remediation scheme and**
 - (2) **The effectiveness of the RZ2 zoning and what steps might be taken to make it more effective.**
9. **The Government strengthens support for local volunteer groups in their efforts to maintain and improve local parks.**
10. **The Government reviews the industrial zoning provisions to make it clear that Fyshwick is not a suitable location for heavy industrial activity but continues as a mixed light industry/commercial/retail area.**
11. **If the Government believes that it would be important to also permit mixed use residential activity in Fyshwick it should develop appropriate regulations to ensure that the interests of both residents and other operators in the precinct are protected.**
12. **The Government develops a Fyshwick Precinct Code/Master Plan, or similar document.**
13. **The Government establishes new air quality monitoring stations in Weston, Gungahlin, and Fyshwick.**
14. **The Government establishes a Legislative Assembly Inquiry into how the ACT might best deal with the administrative costs flowing from opportunistic development proposals seeking to profit from differences in regulation between ACT and neighbouring jurisdictions, the assessment of which may impose unreasonable workloads on the ACT's already overburdened planning and regulatory authorities.**

In comments which are still relevant in 2021, the Griffith Neighbourhood Plan (September 2004) (GNP) states that

“Griffith is primarily residential and is known for its beautiful streetscapes with generous streets, wide verges containing mature trees, and many original rendered, painted and red brick homes with pitched terracotta tiled roofs and attractive front gardens. Its residential character still typifies garden city planning principles.

The remainder of the suburb to the south of Canberra Avenue is essentially suburban and low density in nature and is comprised mostly of modest original Canberra cottages, both public and private, built in the 1930s and 1940s. The area also contains renovated original dwellings and scattered new developments. There is a prevalence of single storey detached dwellings and some duplex-style housing located near the Griffith Local Centre. In general, dwellings are original rendered, painted and red brick with pitched tile roofs, some of which have been modernised through renovation or rebuilding. Setbacks (the distance between the property boundary and the front face of the building) are generous as is the distance between houses. The garages are generally located at the rear of the blocks and the front gardens are well landscaped, many with front hedges. These factors, as well as the street patterns, generous landscaped verges, vistas

along the streets framed by the canopies of mature trees and small parks within the road reserves, contribute significantly to the garden suburb nature of the neighbourhood. In general, streetscapes are mature and impressive.

Streetscapes in Griffith that are recognised by the ACT Planning and Land Authority as significant are as follows: Meehan Gardens, Bannister Gardens, Captain Cook Crescent, Gregory Street, Hann Street, Lindsay Street, Lockyer Street, Murray Crescent, Roe Street and Walker Crescent.”

The Narrabundah Neighbourhood Plan (also September 2004) (NNP) states that “The dominant residential character of Narrabundah is comprised of low-density, single storey family dwellings.” “...in the area to the west of Sturt Avenue and Jerrabomberra Avenue the dwellings are mostly of brick and tile construction, some of which have been modernised through renovation or rebuilding.” “Setbacks (the distance between the property boundary and the front face of the building) are generous as is the distance between houses, two factors that contribute significantly to the spacious, garden nature of the suburb.”

“...there are two groups of features that have been nominated (for ACT Heritage Places Listing) as of April 2004. These are the McKinlay Street Housing Precinct and some bus shelters on Stuart Street and Strzelecki Crescent.”

Both the GNP and the NNP say, in connection with the Future character of the Suburban Area in both suburbs, that

“The Suburban Area of Griffith (or Narrabundah, depending on the Plan) is the residential area that will change the least over time. However, as has been the trend over the last decade or so, some of the existing dwellings in the Suburban Area will be renovated to varying degrees to modernise or to adapt to contemporary ways of life. Some residents may elect to demolish their dwellings altogether and rebuild new houses that better suit their needs; some will elect to build dual occupancies. Whatever the change the low-density character, established street trees and mature garden setting will remain.”

Griffith residents’ favourite places were:

- Telopea Park (which is in Barton but valued for its well-maintained appearance, picnic facilities and BBQs, bike path);
- Manuka Shopping Centre (especially for the restaurants and outdoor cafes, the Lawns, and variety of services available);
- Urban Open Space (all the parks, and any facilities such as play equipment they may have).

Narrabundah’s favourite places (within the GNCA area) were:

- Rocky Knoll (or Knob) Park
- Griffith shops

The views of Griffith and Narrabundah residents were explored in preparing the GNP and the NNP. The top five single most important value for Griffith and Narrabundah residents respectively were:

Value	Griffith	Narrabundah
Local Shops (Proximity to and variety of) 31%	31%	
Open Space and Environment (Parks, ovals, bushland for recreation) 26%;	26%	40%
Character (Well planned, peaceful, safe community feeling) 21%;	21%	17%
Housing (Low density, large blocks, single detached dwelling, limited high density) 12%;	12%	10%
Streetscape (Street trees, vegetation, gardens, wide streets) 5%.	5%	5%
Location (Central location to other parts of Canberra and investment potential, employment, friends and family, services & facilities)		22%

The ten aspects of their neighbourhood that Griffith and Narrabundah residents respectively valued most were:

Valued Aspect	Griffith	Narrabundah
A lot of Green Spaces and Mature Trees	90%	87%
Visually Appealing Built Environment	89%	79%
Peace and Privacy	89%	91%
Mature Trees on Verges	88%	86%
Established Gardens	85%	83%
Central to Other Parts of Canberra	85%	91%
Well Planned, Well Laid Out	84%	80%
Green Open Spaces that Separate Built Areas	83%	80%
Being an Older and More Established Suburb	80%	
Range of Services and Facilities Close by	80%	
Friendly, Community Feel		83%
Close to Shops		81%
Safety		79%

These views are largely consistent with those revealed in the Inner South Canberra Community Council survey conducted in 2019-20. This showed that inner south residents most value the streetscape, open space, character, and environment where they live. The survey found that inner south Canberra respondents value most:

- Streetscape (*street trees, vegetation, gardens, width of streets*) - 70.63%;
- Open spaces (*parks, ovals and bushland for recreation*) – 69.01%;
- Character (*well planned, peaceful, safe, community feeling*) – 62.16%;
- Environment (*reserves, trees, vegetation, wildlife, flora and fauna*) – 59.82%;

- Location (*central location & investment potential, employment, friends and family, services & facilities*) – 53.15%;
- Local shops (*proximity to, and variety of*) – 52.43%;

The aspects of their streets that respondents wanted protected were:

- Trees/street trees, large mature leafy trees, heritage trees;
- Nature strips/verges, wide setbacks, streetscapes, tree lined streets – better maintenance, protect from cars parking/driving over them (verges);
- Parks, open/vegetated spaces, ovals, playgrounds;
- Housing no higher than 2 storeys, low density, domestic residential scale, no McMansions, single use blocks, setbacks from street;
- Heritage listed buildings, 1920s houses, old brick and tile houses, 1950s/1960s architecture, houses with heritage/good design elements;
- Footpaths, walkways linking streets and connecting to parks.

Griffith respondents valued open spaces, parks/open parklands, and playgrounds, as well as the Manuka precinct, and original/old brick and tile houses. Narrabundah respondents were very keen to protect parklands, reserves, open/green spaces, small parks dotted around, and ovals. That most of the community still supports these values was made plain by the comments made at the recent District Planning – Inner South Planning Workshop held at Eastlake FC on 3 June 2021.

Unfortunately, many of the trees that form part of the streetscapes for which Griffith/Narrabundah is well known suffered badly during the millennial drought, and the damage is still evident. For example, many of the pin oaks along Stuart St have suffered die back and now brandish dead branches. A major effort is required to prune those trees that can be saved, and to replace those that cannot. In addition, the Government should install agricultural piping at the drip line around all street trees, so that in any future drought residents can give the tree on their verge an occasional drink (even a watering every month or so can make a difference). The Government should encourage leaseholders to feel proprietorial toward and look after “their” street trees.

Canberra’s Living Infrastructure Plan seeks to achieve 30% tree canopy cover (or equivalent) and 30% permeable surfaces in urban areas of the ACT by 2045. The Urban Forest Strategy 2021-2015 aims at planting approximately 950,000 trees in the Urban Forest ion that period. Half of these trees would be new plantings and half would be to replace older trees. Clearly a major effort will be needed if the requisite number of trees are to be planted. Furthermore, major incentives will be needed if private owners are to be encouraged to reach the required planting rate.

Draft Variation 369 - Living Infrastructure in Residential Zones (DV369) seeks to assist in reaching these targets by mandating site coverage limits on privately owned residential blocks to ensure adequate deep planting area to permit the growth of large trees. The DV was released in December 2019 but has not progressed since that date. There are several problems with the DV, not the least being that it imposes seemingly inconsistent minimum planting area rules - 30% for large blocks, 25% for medium sized blocks in RZ1, 35% in RZ2, 25% in RZ3, RZ4 and RZ5. Many fear that the minimum planting areas proposed are not adequate to meet the challenge. DV 369 needs to be redrafted to increase the minimum planting areas and other strategies developed to encourage owners to plant more trees.

R1. The GNCA recommends that all future development in the GNCA area is consistent with the values expressed by residents of the area and outlined in this submission.

R2. In RZ1 zones housing redevelopment should be restricted to low density single dwelling separate houses of no more than two storeys, well set back from the street, and with ample permeable space for deep rooted trees.

R3. The Government should put more effort into maintaining the well treed streetscapes of Griffith/Narrabundah, replacing as necessary dead or diseased and dying trees with trees of the same or an appropriate substitute species (even if not native).

R4. The Government establish a dedicated agency, and fund it appropriately, to plant at least the 36,000 trees per year required to meet the 30% canopy-cover target.

R5. The Government revise and redraft DV369, to ensure adequate planting areas are available on blocks, and encourages owners to plant trees.

Manuka and Griffith Centres

The GNP recognised that Manuka Group Centre was popular amongst locals and tourists for its arcades (and) boutique stores. The centre, described as vibrant and thriving, “provides a wide variety of goods and services that form a significant employment base – mainly around goods, services (including professional), entertainment and leisure. Outdoor eating is commonplace all year round with transparent awnings providing shelter in winter and in the warmer weather, the restaurants open their window/doors and people eat out.”

Similarly, the Griffith local shops were acknowledged, like Manuka, to “serve not just locals but attract people from around the region. This was driven mainly by the fact that Griffith shops have a focus on wholesome, organic foods, and healthcare with a village atmosphere.”

In recent years Manuka has begun to lose some of its sparkle. As recognised in the GNP, Manuka has long been one of the jewels of Canberra, a magnet for locals and visitors alike. It hosts a unique ecosystem of boutique retailers, high end and everyday restaurants, sociable coffee houses and service industries, such as banks and medical services. The two major Churches are well patronised. Welcome arrivals in recent years have included the Manuka

Terrace development, with its underground car park and large modern supermarket, and food outlets catering for more modest incomes. The nearby East Hotel provides quality accommodation and valuable conference facilities.

But there are also problems to be tackled. The retail sector has operated within a challenging environment, including the growth of online purchasing, expanding retail precincts in Civic and Braddon, and the recent Covid disruptions. More than 20 shops in Manuka were vacant at the time of writing. The east side of Franklin Street has fallen into disrepair in the last decade, The closure of the much-loved Capitol cinema in 2020, accelerated by Covid, has had a knock-on effect for local businesses.

The local infrastructure has been showing signs of age, while the Government has been slow to respond to community requests for remedial action - the degraded state of Palmerston Lane being an example. The block next to the MOCCA childcare centre, once slated for a community facility such as an Inner South Canberra Community centre, possibly including a public library, now remains a mud patch occupied only by a dilapidated electrical shed. The fast-food outlets, particularly, but not only, McDonald's, generate a constant output of discarded food and drink packaging and containers, which disfigure local streets and parks. The steady increase in traffic has as much to do with population growth in outer Canberra and neighbouring NSW as any local factors.

Yet there are signs of hope for the future. Stage one of the elegant new Capitol Hotel is nearing completion. Stage two offers, in addition to an extended hotel, the prospect of a new cinema. In addition to the hotel guests, cinema patrons could kick start a revival for local food and beverage outlets. New apartment developments will provide additional trade for a range of local businesses. However, some fear that this increase in the population of the inner south, combined with Manuka's popularity as a hospitality and entertainment hub attracting patrons from all over Canberra (but particularly from the southern districts) might lead to difficult access through lack of parking, unless this is also addressed.

The recent decision that the proposed Capitol Hotel must have its basement car-park entrance and exit on Canberra Avenue raises the interesting possibility of redeveloping Franklin St as a pedestrian mall.

But the Government must play its part and devote as much attention to the refurbishment of Manuka, and the provision of adequate parking, as it does to the new outer suburbs and the hipster inner northern suburbs.

R6. The GNCA recommends that the Government provides more support to assist the regeneration of Manuka so it can keep its place as one of Canberra's leading retail, hospitality, and entertainment centres.

The GNCA, along with the Inner South Canberra Community Council (ISCCC) and the Kingston Barton Residents Group (KBRG) has long pushed for a long-term plan for the Manuka Kingston area, running from the Amaya site on Flinders way northwards through Manuka (including the adjacent developments in Forrest and the Stuart Flats and neighbouring sites), Telopea Park, Kingston Centre, and Kingston Foreshore. What sort of challenges and changes might this area see over the next 30 to 40 years?

R7. The Government develops a long-term plan for the Manuka/Kingston area, identifying likely and possible changes to the area over the next 30 to 40 years.

The GNCA notes that the GNP and NNP were both prepared in 2004, and that there have been significant developments since that time.

There has been, and continues to be, significant densification. In particular, the RZ2 zone adjacent to the Griffith shops has been largely redeveloped, particularly along Lindsay and Landsborough Streets. Up to 22 Mr Fluffy residences have been demolished and replaced by single or dual occupancy dwellings. The O'Connell Centre has been replaced by a Baptist Community Care high care aged home. The Inner South Canberra Library has been moved from Blaxland House (formerly Griffith Primary School) to an inferior and less accessible site in Kingston Group Centre. The Bowling Club site on Austin St was transferred to the Brumbies, who after securing a rezoning then sold it to a developer who built the Amaya complex. The public housing units at the Stuart Flats and Gowrie Court have been demolished and are being replaced with a much larger number of apartments. While a replacement of these more than 50-year-old dwelling was inevitable it has involved the further loss of trees and open space, and the onus lies with the Government to replace these, particularly if it wishes to have its 30% tree cover target taken seriously.

This listing of changes indicates that densification has been proceeding at about as fast a pace as is practical or feasible in Griffith and Narrabundah, and the Government should resist pressure from vocal but ill-informed ideologues to somehow increase densification at an accelerated pace in the area. Griffith and Narrabundah already have a high proportion of apartments, townhouses, units, and flats in their housing mix.

Some of the wider issues associated with densification are discussed further below.

The redevelopment of a most of the available sites in the Griffith RZ2 zone and the completion of most of the Mr Fluffy redevelopments provides an appropriate opportunity for Environment, Planning and Sustainable Development Directorate (EPSDD) to review both the Mr Fluffy program and the RZ2 zoning rules. The Mr Fluffy program should be looked at to determine what proportion of Mr Fluffy sites were redeveloped as dual occupancies or subdivided in to two titles, and how successfully these new dwellings blend in with their neighbourhoods. How successful has this spot quasi RZ2 infill been?

In relation to RZ2, any review should start off by asking:

- To what extent has the redevelopment to date achieved ACTPLA's initial objectives?
- How could the planning rules government RZ2 be improved? Should the prohibition on two storey dwellings that do not directly face the street be maintained? Why can one build two dwellings side by side, but not one on top of the other? Etc, etc.
- Should the RZ2 and RZ3 zones be merged? What would be the advantages and disadvantages?
- Should there be provision for expansion of RZ2, and if so, in what timeframe? Should there be published trigger points, so that the public would know that a street was liable to be rezoned?

R8. The GNCA recommends that EPSDD immediately initiate reviews of (1) The impact and outcomes of the Mr Fluffy remediation scheme and (2) The effectiveness of the RZ2 zoning and what steps might be taken to make it more effective.

Blaxland Park was formally recognized in 2013, and since then almost 100 trees have been planted to improve the site by a local support group. Other groups are active in the Griffith Woodlands (La Perouse Park), Griffith Park and Wells Gardens, and Bass Gardens. Such groups provide significant assistance to the Government in the maintenance of the plethora of small parks, which abound in the inner south, and would provide a good return on any assistance provided by the Government. Assistance with funding for volunteer insurance, OH&S training and provision of any required OH&S equipment, appropriate tools, protection from rabbits, possums and human for young trees, and a small contribution towards administration and auditing costs, would be most welcome.

R9. The GNCA recommends that the Government strengthens support for local volunteer groups in their efforts to maintain and improve local parks.

Fyshwick

Although Fyshwick is outside the GNCA's area, developments there can have a significant impact on residents of Griffith and Narrabundah, for example the recent spate of proposals to locate garbage or other waste materials processing centres of various forms in the suburb. Furthermore, there is local no community group representing the views of Fyshwick's businesses and workers.

The GNCA is of the view that heavy industrial developments are unsuitable for Fyshwick (and probably unsuitable anywhere within the ACT) and that the zoning should be changed to make it clear that the area is to be reserved for a mix of retail and light industrial activity similar to that currently found in the area. This might require the introduction of a zoning provision which restricted "industrial" activity to those undertaken by skilled tradesmen or artisans, but exclude activities undertaken in large factories or plants that undertake fabricating, processing,

transformation, beneficiation, extraction, or energy generating activities. This would permit the continuation of activities such as repairing and/or repainting cars, making furniture, framing pictures, and the like, preparation and sale of food, big box retail outlets unsuitable for town centres, storage facilities, and general office and retail.

It may be thought desirable for Fyshwick to be permitted to develop as a mixed-use precinct, adding residential uses to those specified above. This would require EPSDD to finalise rules about the appropriate separation of business and residential activities in building shared by the two or more activities. Rules are needed on air-conditioning and airflow separation, separate metering of water, provision of separate residents and goods lifts, separation of basement storage areas from car parking areas, and many more issues. It seems unlikely that these issues have not been satisfactorily resolved in other jurisdictions.

Building on these initiatives it would be helpful if the Government developed (with appropriate consultation) a Precinct Code, Master Plan, or similar document for Fyshwick to make clear what is to be expected as Fyshwick further develops.

The recent various waste processing proposals to be located in Fyshwick have highlighted the inadequacy of the current air quality monitoring network, with only three permanent air-monitoring stations, located in Florey, Civic and Monash. The location of these stations means that it is impossible to accurately estimate air quality in Fyshwick. Adding new air-monitoring stations in Weston, Gungahlin, and Fyshwick would allow air quality all over Canberra to be monitored.

R10. The GNCA recommends that the Government review the industrial zoning provisions to make it clear that Fyshwick is not a suitable location for heavy industrial activity but continues as a mixed light industry/commercial/retail area.

R11. If the Government believes that it would be important to also permit mixed use residential activity in Fyshwick it should develop appropriate regulations to ensure that the interests of both residents and other actors in the precinct are protected.

R12. The Government develops a Fyshwick Precinct Code/Master Plan, or similar document.

R13. The Government establishes new air quality monitoring stations in Weston, Gungahlin, and Fyshwick.

The recent plastic to fuel, waste to energy and waste sorting proposals seem to be principally driven by a desire to take advantage of the differences between the ACT's controls and those of other jurisdictions, particularly NSW and Victoria.

R14. The Government establish a Legislative Assembly Inquiry into how the ACT might best deal with the administrative costs flowing from opportunistic development proposals seeking to profit from differences in regulation between ACT and neighbouring

jurisdictions, the assessment of which may impose unreasonable burdens on the ACT's already overburdened planning and regulatory authorities.

Difficulties with endless 'Densification'

Support for densification of the RZ1 Suburban zone carries with it the implicit assumptions that Canberra's population will continue to grow as rapidly as it did in the period 2015-2020, and concomitant with the growth in residential housing will be a growth in employment opportunities. Neither of these propositions is obviously true. Australia's growth has slowed markedly over the past 18 months as immigration has come to a virtual halt, and despite the protests of business, it is not at all certain that immigration will ever recover to the levels of 2019. In 2020 Canberra's population only increased by about 3,000, much lower than Minister Gentleman's assertion that Canberra's population is increasing by 8,000 per year. Given the number of new apartments currently being built in the inner south, and indeed, all over Canberra, some pause in the pace of redevelopment might well be prudent.

Even if the people and the jobs do come, where would the ACT find the water for a city of more than 1 million people? There is only a limited amount of water in the Southern Highlands and Southern Tablelands, and much of this is already committed to the Murray Darling basin or to Sydney. Pumping desalinated water up from the coast would be an expensive option.

One of the justifications for densification is that it will reduce the current high average costs of delivering transport and infrastructure to Canberra, given its extraordinary spacious layout. But even to double the average housing density in the currently developed areas would not make a lot of difference to the average density. This is because a large proportion of the built-up area of Canberra is used for streets, verges, micro-parks (gardens, circles, etc), roundabouts, road dividers, etc, rather than for domestic housing. And then there are the major parks (Mt Taylor, Oakey Hill, Isaacs Ridge, Red Hill, the Lake, Mt Ainslie/Mt Majura, Black Mountain, Bruce Ridge) that separate the various districts, which seem unlikely to be considered as suitable for development.

Finally, we now learn that roadworks associated with the proposed 2B light rail extension will cause "traffic chaos" for commuters from south Canberra for several years. It therefore makes no sense to proceed with any intensification south of the Lake while the threat of severe traffic disruption from the south remains.

Thank you for the opportunity to present the GNCA's views.



David Denham, President,

24 July 2021