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## DRAFT VARIATION 332 GOWRIE COURT

### Summary

GNCA is very concerned that the redevelopment now being contemplated in the current Draft Variation 332 is significantly different and higher in density than was earlier proposed by the Government and agreed to by community representatives at the conclusion of the extensive consultation process. We cannot support the Draft Variation as it currently stands. GNCA strongly recommends that the Draft Variation be amended to provide that:

- 1) The density of the proposed redevelopment be reduced to retain the attractiveness of the site and to reduce anticipated traffic and parking problems;
- 2) The traffic study be revised to account for the impacts of the 160 bed Baptist Care facility next to Griffith shops and the re-development of the Stuart Flats;
- 3) The Precinct Code specifies the number of dwellings of each type (certainly no more than 180 in total, and preferably less), the number of bedrooms in each type, and whether parking was at level or in basement for each type of dwelling;
- 4) The entire site be developed as a whole and subject to an integrated Estate Development Master Plan;
- 5) Areas **a**, **b** and **d** be zoned RZ2, and area **c** being zoned RZ5 and restricted to four storeys;
- 6) The landscaped areas, including the dimensions of the landscape corridor, be included in the Precinct Code;
- 7) The height of buildings on that part of area **d** north of the sewerage easement be restricted to two storeys to avoid over-development of the site and reduce shadowing of other dwellings;
- 8) Buildings in area **c** be restricted to four storeys at maximum;
- 9) The Precinct Code be renamed 'Gowrie Court Precinct RC3 – Additional Provisions' and appropriately amended to clarify its provisions;
- 10) The height of buildings be specified in metres as well as in storeys;
- 11) The definitions of areas **a**, **b**, **c** and **d** be redefined;
- 12) Criteria C6 and C7 be recast as Mandatory Rules; and
- 13) Rule R7 be revised to make it clear that the "visual corridor" was to extend the line of Stuart St and to run above the sewerage easement.

## Background

The Griffith Narrabundah Community Association (GNCA) appreciates the opportunity to comment on Draft Variation 332, particularly as we were able to participate in the extensive consultation process that took place on the proposed re-development of this site. We also wish to make it clear that we support the re-development of Gowrie Court and we hope our comments will contribute towards a high quality outcome in this Precinct.

Gowrie Court currently comprises 72 two bedroom dwellings (so 144 bedrooms) in six three storey blocks, built in 1959. We note that the two rights of way running beside the site from Macintyre St to Jerrabomberra Oval, one on either side of the site, on Blocks 1 and 2 on the south west and north east sides respectively, are to be excluded from redevelopment, which will only cover Block 3 Section 62 Narrabundah.

It is not clear from the Draft Variation how the Government proposes to redevelop the site. The Site Investigation Report of June 2014 makes reference (p2) to 180 units, apparently of two bedrooms. The Precinct Code will allow three storey as well as two storey blocks of town houses, and two six storey tower blocks at the rear. This appears to be somewhat more than what was proposed at the end of the consultations, when we understood that 60 townhouses and 80 apartments, the latter in two four storey blocks at the rear of the site, was the preferred option.

## General Comments

Clearly the nature of the redevelopment will be dependent on the relative numbers of both town houses and apartments, and the number of bedrooms in each. To meet market demand one would expect all the town houses to have three bedrooms, and this should be specified. Any apartments should ideally be of two bedrooms. Whether it is proposed that the town houses have car parking underneath or at level would also be relevant. Town houses stacked in two layers over a basement car park would have a much more “apartment” feel, no matter what they were called, than townhouses with adjacent ground level parking, such as for example the housing in Throsby Court. In this regard we note that much of the demand for town houses comes from the 55 years plus demographic, who may have some doubts about their longer term ability to climb stairs. This group has a strong preference for “at level” parking and this redevelopment provides an opportunity to meet this demand.

We recommend that:

- a) **the Precinct Code spell out exactly the number of town houses and apartments to be permitted (certainly no more than 180), the number of bedrooms for each class of dwelling, and the relative location of parking for each dwelling. This would clarify what could be built on the site and reduce pressure to overdevelop the site.**

The GNCA has real concerns that the redevelopment proposal represents a massive increase in the urban intensification of Section 62 Narrabundah, to such an extent that it is at variance with the strategies in 2012 ACT Planning Strategy.

For example Strategy 1 specifies that "Urban intensification is focused in town centres, around group centres and along major public transport routes." This site is not in the vicinity of a group or town centre and is located on a "minor collector" road nowhere near a major public transport route (one bus route passes by). It is also approximately 700m from the nearest local shops (it is about equidistant to either Griffith or Narrabundah shops) and there is no convenient access to shops, schools, medical facilities and all the other services supposedly located close by in a high density RZ5 zone. Essentially this is currently a cluster of RZ2 or RZ3 public housing rusticated in the middle of a broad expanse of RZ1 suburbia. While it is puzzling why this was thought to be a good place to locate apartment housing in 1959, bad judgement by a nascent NCDC at that time does not justify the rezoning of this site as RZ5 in 2015!

To zone the whole site RZ5, a zoning category higher than any development currently proposed for the site, even by the Government, would just invite continuing pressure from developers to redevelop the site to a density commensurate with its zoning (no matter how inappropriate for its location, as previously discussed). We recommend that:

- b) The townhouse areas of the site (ie areas a, b and d) should be zoned RZ2 to reflect their relatively low rise, low density nature, while area c should be zoned RZ5 and restricted to four storeys to reflect the desired height and density of development on those segments.**

In addition, the Government should learn from the many difficulties with the Kingston Foreshore development, and ensure that the site is developed as a unified whole.

- c) The Precinct Code should require that the entire site be subject to an integrated Estate Development Master Plan, even if the site is sold off in a number of lots, rather than in one lot. Development by one developer would be our preference.**

However, the proposed redevelopment would provide more choice in housing stock with a large part of the precinct devoted to town house development. Currently there is a significant market failure in the housing market, in that there are too many **one bedroom** apartments being built in Canberra, while those who would like to live in 'town house' type buildings have difficulty finding a suitable dwelling. We therefore welcome the decision to provide the opportunity for a significant number of town houses to be built in the precinct.

Unfortunately the current proposal does not envisage/indicate any open space or landscaped areas. Whilst the Precinct Code mandates a "landscape and visual corridor" through the middle of the site the dimensions of this landscape corridor have not been included. It appears that the visual corridor is intended to continue the line of Stuart St through the site to

Jerrabomberra Oval behind the development, and run along the sewerage easement which bisects the site. If these suppositions are correct they should be explicitly stated in the Precinct Code. As things stand at present, the outcome for the precinct could be cheek by jowl town houses across the whole site. Consequently, we recommend that:

- d) Landscaped areas, including the dimensions of the landscape corridor, be included in the Precinct Code;**

We are of the view that the townhouses in that part of area **d** should be reduced from three storeys to two storeys so as to avoid overshadowing the site, and the proposed tower blocks in area **c** be reduced in height from six storeys to four storeys. Consequently we recommend that:

- e) The height of buildings on that part of area d north of the sewerage easement should be restricted to two storeys to avoid overdevelopment of the site and reduce shadowing of other dwellings; and**
- f) Buildings in area c should be restricted to four storeys at maximum.**

Introduction of these changes would provide opportunities for more open space and the development would not appear to be overcrowded.

## **Traffic and Parking**

The Traffic Assessment, included in the Site Investigation Report, assumes that the 180 units will generate 1,080 car trips per day, or 6 trips per unit, and further assumes that about 10% of these trips, or 108 trips would take place every hour during morning and evening peak hours. We note that this approach appears overly simplistic when it appears that a large number of two bedroom units may house at least two car owners, a large majority of whom might be expected to leave for work in the morning and return in the evening. So maximum flows might be about 180 vehicles per hour leaving if we assume a two hour morning peak hour rush, and 360 if we assume a one hour rush, somewhat greater than the 108 assumed.

On the basis of the assumed 108 vehicles per hour the Traffic Assessment asserts that there will be no traffic problems, as this traffic will use either Captain Cook Av or Sturt Av, both high traffic volume roads. This analysis ignores Stuart St, which is likely to receive a fair portion of the generated traffic as the shortest route to both Griffith Shops and Manuka, and which would be the most direct way to place of employment for those residents who worked in Barton/Parkes, Civic, or Belconnen. In this regard it should be noted that Stuart St is currently (according to the traffic analysis prepared for the Stuart Flats redevelopment) already operating above its design limit of 3,000 vehicles per day. However, given that the new 160 bed Baptist Care aged care facility next to Griffith shops has just opened, and that the proposed redevelopment of the Stuart Flats will add at least 2,124 vehicles per day to the local streets, with the majority of these on Stuart St, it seems likely that the assumptions underlying the Gowrie Court Traffic Assessment were both too narrow and too conservative.

**The GNCA regards it as essential that the Traffic Report be revised to take into account these highly relevant but so far ignored inputs.**

In addition, no consideration appears to have been given to the number of children that might be expected in a redevelopment of the size proposed, and where these would attend school. The nearest Government and Catholic primary schools are across Sturt Av, a divided four lane major collector road with a traffic flow cited in the report of 10,000 vehicles per day.

On the basis of 180 two bedroom units there would need to be parking for 270 residents cars, with a consequent requirement of 8,100m<sup>2</sup> of parking space at 30m<sup>2</sup> per vehicle. In addition the Parking and Vehicular Access General Code requires one visitor parking space for each four unit, or 45 parking spaces, requiring a further 1,350m<sup>2</sup>, giving a total parking space area of 9,450m<sup>2</sup>. As the total area of the site is only 13,775m<sup>2</sup>, **car parking would take up 69% of the total site area, so it appears that a large amount of this parking would have to be underground.** The sewer main running through the middle of the block will further reduce the area available for construction of underground parking. The need for extensive underground parking areas will significantly increase the costs of the redevelopment, and reduce the amenity of the redevelopment in that there will be greatly restricted space for deep rooted trees, which are one of the attractions of the area and might be seen as a significant selling point by developers. In addition, parking that is underground will be less attractive to potential town house purchases, particularly those older than 55 plus, as discussed above.

Were the site to be developed as a mixture of 60 three bedroom town houses and 80 two bedroom apartments the codes require that there be parking for 240 cars, so the traffic and parking problems would be marginally smaller (by about 9%), but still very challenging.

Finally, it appears likely that the redevelopment of the site would take a considerable period, probably as long as two years. No consideration appears to have been given as to where those working on the site are to park. Are they expected to park on neighbouring streets, further impeding traffic? Not only will this be inconvenient for residents, it will make rubbish collections more difficult and no doubt in some cases impossible as truck will have restricted or no access to the curb, and traffic will be slowed, making for further difficulties for Stuart St which is already near or above capacity.

All these considerations suggest that **what is proposed involved is an overdevelopment of the site** with reduced amenity for both its future residents and its neighbours. If it is the LDA's intention to maximise the sale value of the site, the **GNCA recommends that some restrictions be placed on the density of the site** to ensure that it retains the attractive residential features of the area within which it is located would probably be a worthwhile approach.

## Comments on the Precinct Code

It is important that the Precinct Code is clear and unambiguous so what is finally built is consistent with the Desired Character. We therefore suggest that the Code be amended in some sections.

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### Precinct Code Title

The currently proposed title for this amendment to the Narrabundah Precinct Code is the rather mundane “RC3- RZ5 zone additional provisions”. We suggest that:

- g) **this title be replaced by the rather more intuitive “Gowrie Court Precinct RC3 – Additional Provisions”**

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### Building height

- h) **As well as prescribing the number of storeys in the four zones, the maximum building heights in metres must also be defined.** The height is a more important parameter when assessing the visual impact than the number of storeys and this measure would remove any ambiguity as to what is the permitted height.
- i) **The definitions of areas a, b, c and d in R3, R4 and R5 need to be revised.** Areas are not measured as a depth. We note that no attempt is made to define area d. The definitions should read something like:

Area **a** is that area to the north and east of a straight line joining the point on the McIntyre St frontage of Block 3 and 36 metres from the boundary with Block 2 to the point on the rear boundary with Block 4 Section 64 and 29 metres from Block 2.

Area **b** is that area to the south and west of a straight line joining the point on the McIntyre St frontage of Block 3 and 34 metres from the boundary with Block 1 to the point on the rear boundary with Block 4 Section 64 and 22 metres from Block 1.

Area **c** is that area not within Area **a** or Area **b** that is within 40 metres of the rear boundary with Block 4 Section 64.

Area **d** is that portion of Block 3 Section 62 that is not within any of areas **a**, **b** or **c**.

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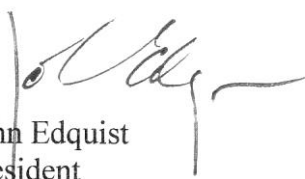
### Built form

Criteria C6 and C7 have no applicable rules. Criterion C7 is particularly confusing as its third paragraph begins “For this rule...”.

- j) **Criteria C6 and C7 should be reformulated as mandatory Rules and removed as Criteria.**
- k) **It would be desirable to expand R7 to make it clear that the “visual corridor” was to extend the line of Stuart St and to run above the sewerage easement, if this is what is intended.**

We look forward to a revised Gowrie Court Precinct Code reflecting unambiguously the outcomes of the community consultations, and conveying clearly both to the community at large, and to potential investors and developers, what will be permitted during the redevelopment of this site.

Yours faithfully



John Edquist  
President

11 August 2015