



The Territory Plan Section  
Environment and Planning Directorate  
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## **DRAFT VARIATIONS 332, 333 & 334 – REDEVELOPMENT OF GOWRIE COURT, STUART FLATS AND RED HILL FLATS**

The Inner South Canberra Community Council (ISCCC) welcomes the opportunity to make comments on Draft Variations 332, 333 and 334 (DV332, DV333, DV334), relating to the proposed redevelopment of Gowrie Court, Narrabundah; Stuart Flats, Griffith; and Red Hill Flats, respectively.

The ISCCC recognises that the buildings on all three sites were built 55 years ago (1959 for Gowrie Court and Stuart Flats, 1960 for Red Hill Flats) and that, consequently, it is more economical to demolish and replace them with more modern structures than to maintain and retrofit them.

We also accept that, if the buildings are to be demolished, this provides an opportunity to realise some of the accumulated capital gain crystallised in these sites and use it to provide more and better public housing in other parts of Canberra. This process would also provide the opportunity to rebalance the public housing portfolio by acquiring more public housing in areas outside the Inner North and Inner South, where an unduly large proportion of Canberra's public housing is concentrated for purely historical reasons.

The ISCCC appreciates the very professional and comprehensive consultation process undertaken by the ACT Government through the Public Housing Renewal Taskforce headed by Mr David Collett. Mr Collett and his team spent many hours consulting with the ISCCC and its constituent residents' groups.

This was an excellent model that we hope is adopted in the future, and was clearly preferable to some of the more shallow and tokenistic efforts that we have witnessed in recent years. That we disagree with the final shape of the Draft Variations should not be seen in any way as a reflection on the efforts made by the Taskforce to engage the community over many months.

It does reinforce, however, that the ISCCC and other similar groups have substantial ongoing concerns about the way development and re-development of Canberra's suburbs is being driven by the Territory's budgetary requirements. We flagged this concern at successive consultative meetings and it was always likely that this would remain an ongoing issue for the community despite the best efforts of the Taskforce to address our concerns within the budgetary requirements that clearly formed the backdrop to the final proposals for these sites. We made similar comments in relation to our concerns about fiscal

imperatives driving the inferior outcomes proposed by the Government for the Canberra brickworks redevelopment.

At the very beginning of the consultation process the ISCCC and its constituent residents' groups expressed concern that the high financial returns expected of these projects by the Government were pressing these projects towards population densities that would not fit comfortably with the current amenity of these respective neighbourhoods. What should have been a reasonable process of property portfolio management has been transformed into an apparent attempt to maximise the cash return to the Government at all costs.

This seems to be happening without due regard to the Territory Plan, nor any disutility to the neighbourhoods in which these sites are located, let alone the amenity of the current residents of these public housing complexes. It appears that many of these members of our local community are to be removed from their homes and exiled to new, distant, housing estates, far from shopping, jobs and public transport.

The developments that appear to be countenanced by the three Draft Variations would represent an egregious overdevelopment of each respective site. Each of the redevelopments would require the construction of massive parking structures to accommodate all the car parking spaces the Government's own rules require that developers must provide. And they would appear to generate traffic that would exceed the capacities of the surrounding service roads, and may adversely impact on surrounding arterial roads. The absence of comprehensive traffic studies relating to this matter has been a cause for real concern.

The Government's strategy appears to be to release the sites with Precinct Codes that would permit this overdevelopment, pocket the money from developers, and then deal with planning issues such as traffic flows during the DA approval process. However, it appears unlikely that developers, having paid top dollar for the sites, would be amenable at that stage to a reduction in the scale of what they could build, and endless litigation might be expected to ensue unless compromises were made by the Environment and Planning Directorate (EPD) in sympathy with developers' needs.

This is demonstrated by the Government's insistence that all the sites be rezoned as RZ5. The Territory Plan provides for RZ5 developments (which the plan clearly perceives as about 6 storeys high) in areas appropriate for high density residential development, such as adjacent to Civic and the town centres, especially Woden and Belconnen. The Plan clearly did not envisage applying RZ5 in the middle of RZ1 zones in the suburbs, either next to a local centre such as Red Hill (where the appropriate zoning is RZ2, the current zoning at that site), or the middle of RZ1 suburbia, like Gowrie Court.

Even in relation to the Stuart Flats adjacent to Manuka, where one might have thought that a case could be made for RZ5, public resistance is very strong because there is no confidence that this zoning will not be liberally misinterpreted to allow buildings greatly in excess of the six storeys nominally permitted in the Plan.

The best way to restore public confidence in how the Plan might be interpreted would be to remove all the Criteria, which allow subjective and unstructured judgement calls, and to make all the Rules in the Plan mandatory.

Further steps that the Government could take to restore public confidence in the planning process would be to undertake adequate traffic studies before the publication of Draft

Variations such as these, and to demonstrate a willingness to accept the results of these studies and to modify accordingly what is planned. In the current case it appears that EPD has not taken sufficiently into account the expert advice which it receives from the Roads area of Territory and Municipal Services Directorate (TAMSD).

The ISCCC supports the Government's 'Salt and Pepper' social housing policy, which aims to mix public tenants on the one hand and private tenants and owners on the other, at a relatively low percentage, say 10% to 15%. This prevents the creation of ghettos of disadvantage and integrates social housing tenants into the wider community. The Government has declined to commit itself to a specific percentage of social housing in the redeveloped sites, and this number appeared to have declined to zero by the conclusion of the consultations. We would welcome a commitment from the Government to a specific percentage.

The ISCCC believes that longer term residents in the social housing on these sites should have the opportunity to be resettled nearby, if that is their wish. Many will have built up a community where they live and we would oppose any requirement that they abandon this to allow redevelopment of these public housing sites.

The Government might suggest that there has been little public call for such a policy from the current residents, but this would be to misread the situation, as many residents feel they cannot, or should not speak out on this matter. Through no fault of their own, many of public housing tenants have not always had the opportunity to advocate effectively for themselves.

Although the Draft Variations claim to be enlarging the choice of housing available in Canberra, the predominant element in the proposed redevelopments appears to be one or two bedroom apartments. However, it is generally now conceded that the market for one and two bedroom apartments is approaching saturation, and that townhouses are in increasing demand. A switch to larger three and four bedroom apartments and townhouses would attract the wealthier downsizing segment that does not contemplate moving to a small apartment, improving overall returns to the Government.

All three redevelopment proposals are large projects. The ISCCC believes that better community and architectural results would be achieved if each of these sites were to be subject to an integrated Estate Development Master Plan, and the entire site be developed as a whole. If this is easier to achieve by selling a whole site to one developer rather than selling a number of subdivisions of each site to independent developers, then the ISCCC believes that this is the course that should be followed.

### **Specific Comments in relation to DV332**

The ISCCC believes that:

- The traffic study for the site should be redone to take account of the impact of the recently completed 160 bed aged care facility at Griffith shops, and the proposed redevelopment of the Stuart Flats at Manuka, and to reflect the probable traffic patterns of the new residents with differing socio-economic and employment demographics to those of the current inhabitants;
- The number of units proposed for the site should be significantly reduced and this lower number specified in the Precinct Code;

- The proportion of town houses to be built on the site be increased viz a viz one or two bedroom apartments, and that this higher proportion be specified in the Precinct Code; and
- The two proposed six storey towers at the rear of the site be reduced to four storeys;
- The entire site with the exception of the two towers be zoned RZ2;
- The other reductions in height and bulk recommended in the Griffith/Narrabundah Community Association (GNCA) submission on DV 332 be adopted; and
- The improvements and clarifications to the proposed Precinct Code in DV332 as proposed by the GNCA be adopted.

### **Specific Comments in relation to DV 333**

The ISCCC has confidence in TAMSD's professional judgement in relation to traffic management, and consequently supports:

- TAMSD's view that all traffic impacts on the surrounding suburban and arterial road networks are evaluated and resolved.
- TAMSD's assessment that *"Access arrangements to the proposed development should not be from Captain Cook Crescent due to the close proximity to Canberra Avenue"*.

The ISCCC believes that:

- The Traffic Assessment needs to be redone taking into account
- Recently completed, currently underway, and proposed development in the area to adequately address the impact on the neighbourhood as a whole. This should include not just those projects enumerated in the GNCA submission on DV333, but in relation to the impact on arterial road should also consider the Eyre St redevelopment at Kingston, and the Government's longer term plans for Manuka Oval and surrounding areas, and the Arts Precinct at Kingston Foreshore;
- Realistic models of car ownership and likely travel routes reflecting the socio-economic and employment demographics of those likely to reside at the redeveloped site rather than those of the current inhabitants;
- The likely impact on traffic flows in neighbouring streets if the proposed new Site Access Road cannot be proceeded with;
- The DV needs to be amended to indicate whether the proposed Site Access Road will be permitted given the opposition of TAMSD to this solution, and if such a road is to be permitted the DV needs to explain how public safety will not be compromised by this decision;
- The proposed excision of 860m<sup>2</sup> Public Open Space zoned land from Block 5 Section 43 (aka Light Park) should not be proceeded with;
- The maximum number of dwellings on the redevelopment be significantly reduced to below 400 dwellings and the mix of housing be adjusted to increase the proportion of town houses or three and four bedroom apartments;
- The Precinct Code should require a child care facility with places for at least 100 children be included in the redevelopment;
- As many as possible of the 1 Exceptional Value, 14 High Value and 41 Medium Value Regulated Trees on-site be spared, and to encourage developers to think seriously about how this might be achieved developers be required to pay \$10,000 for every Medium

Value Regulated Tree removed, \$25,000 for every High Value Regulated Tree removed, and \$50,000 if the Exceptional Value Regulated Tree is removed;

- The Precinct Code be changed to remove the proposed Rules which would not count any ground level sub-building car parking as a storey for the purposes of height regulation;
- Those areas proposed for rezoning to RZ2 in the GNCA submission on DV333 be so rezoned;
- The reductions in the permitted height for various areas proposed in the GNCA's submission be adopted;
- The recommendations in relation to pedestrian access and maintenance of public pedestrian pathways in the GNCA's submission be adopted; and
- The clarifications simplifications and improvements to the Precinct Code proposed by the GNCA be adopted.

### **Specific Comments in relation to DV334**

The ISCCC believes that:

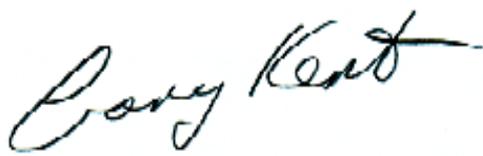
- The number of units proposed for the site should be significantly reduced and this lower number specific in the Precinct Code;
- The traffic study for the site should be redone to take into account the impact of the other substantial development proposals in the area (such as Morling Lodge). It should also be extended to include surrounding and arterial road networks that will be drastically affected by a development of this size (such as La Perouse and Dalrymple). Traffic impact studies on these roads must be evaluated and resolved before progressing;
- The emergency and waste services reports be released, as the plans do not appear to give adequate consideration for these necessary services due to the proposed density of the site
- The mix of housing be adjusted to increase the proportion of town houses or three and four bedroom apartments, and that this higher proportion be specified in the Precinct Code;
- The entire site should be zoned RZ2;
- Public safety of the schools and shop areas should be considered with the dramatic increase in traffic;
- The Precinct Code should be amended to remove the proposed Rules that would not count any ground level sub building car parking as a storey for the purposes of height regulation; and
- The maximum height of the development be 3 storeys.

ISCCC will provide further supporting comments on DV334 before the Red Hill Residents Group Submission is formally lodged.

The ISCCC looks forward to revised draft Precinct Codes for the Gowrie Court, Stuart Flats and Red Hill Flats redevelopments which reflect a significant reduction in the proposed intensity of the development, more realistic assessments of the likely parking and traffic impacts of the proposals, and residential zonings reflecting the density proposed rather than the highest zoning available. We would also welcome clarification of the status of the Salt and Pepper public housing policy, and advice on how the Government proposes to deal with existing public housing tenants in the three sites, particularly long term residents.

Thank you for the opportunity to comment on these draft variations.

Yours faithfully

A handwritten signature in black ink that reads "Gary Kent". The signature is written in a cursive style with a long horizontal stroke at the end.

Gary Kent  
Chair  
17 August 2015