



Inner South Canberra Community Council

Environment and Planning Directorate
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cc. The Hon. Ms Brodtmann MP,
Chief Minister, Minister Gentleman, Minister Rattenbury
Minister Stephen-Smith, Ms Lee MLA,
Ms Candice Burch MLA, Ms Le Couteur MLA

Removal of the concessional status from Block 1 Section 15 Griffith (DA 201732582)

The Inner South Canberra Community Council supports the submission of the Kingston and Barton Residents Group in raising significant concerns about the proposed deconcessionalisation of the Canberra Services Club premises at Block 1 Section 15 Griffith.

As indicated in Section 261 of the Planning and Development Act, applications to remove the concessional status of a Crown lease must not be decided unless the Planning and Development Authority, or the Minister, decides it is in the public interest to do so.

The Inner South Canberra Community Council contends that DA 201732582 does not satisfy the “public interest” test, which requires consideration of the following issues:

(a) Whether the Territory wishes to continue to monitor the use and operation of the lease by requiring consent before the lease is dealt with

The ISCCC considers that the Territory should continue to monitor the use and operation of the lease until such time as there is an agreed master plan and precinct code for the Manuka Oval and surrounding precinct to guide development. The Chief Minister made a very clear and firm public commitment in 2016 stating that a community panel would be formed to help ‘[inform a new, detailed Master Plan for the Oval and its surrounds](#)’ (see [ACT Government dumps GWS Giants-Grocon unsolicited bid for Manuka Oval development](#)). In July 2018 Mr Barr responded to a Question on Notice in the Legislative Assembly (QON No. E18-103) that there is no change to government policy and that the Minister responsible for Planning and Land Management has responsibility [for delivering a Master Plan for the broader Manuka Precinct plan that will include the business precinct](#).

(b) Whether approving the application would cause any disadvantage to the community taking into account potential uses of the leased land that are consistent with the territory plan, whether or not those uses are authorised by the lease

The removal of the concessional status will have a significant adverse impact on the community:

- With massive increases in density in suburbs like Kingston and Barton, and apartments constituting close to 90 percent of dwellings in those suburbs, it is more important than ever to support community amenity and green open space in such high-density suburbs.
- If this site is lost, it will leave only Eastlake Football club within easy walking distance as a club site to support a large population. The proponent refers to other clubs within a 3 km radius, but most of them are not within easy walking distance, especially for those with mobility issues, or else they are not actual clubs. For example, the Kingston Hotel is a private business, not a club.

- Concessional leases generally host venues that provide opportunities for all socio-economic groups to be able to participate in recreational activities in a friendly and less costly environment. These local community clubs also give back to the community as part of their social license and under the requirements of the ACT Government.
- As noted by the KBRG submission, much of the commentary after the Test Match in February highlighted the 'village' and 'boutique' feel of the oval. Having a significantly large, and out of character development, immediately adjacent to the Oval may be the thin edge of the wedge in removing what is attractive about the Precinct in the first place.
- In addition, there is significant development about to occur in the Manuka Business Precinct. The pending sale of the Stuart Flats (divided into four blocks) scheduled for March 20 will see 484 units built within 500 metres of the current Services Club site. This will see more than 1000 new residents wanting and demanding local services including community and green spaces.
- The proposed development for Section 69 Griffith proposes a 200 room hotel with limited parking. These combined developments (Stuart Flats and the hotel) will place significant strain on the area for its amenities, in particular parking but also access to community and open public spaces.
- Deconcessionalisation of the lease will add to the exponential loss of concessional leases across Canberra, with clubs and developers profiting from land gifted to them by the Government, essentially funded by the taxpayer/ratepayer.

(c) Whether the application to vary the lease to make it a market value lease is, or is likely to be, part of a larger development and, if so, what that development will involve

Regrettably, the DA still fails to provide adequate details of the nature of future development. While it indicates there are plans to rebuild the club on the site, it also appears that sale of the land is likely. It is stated on page 30 of the Social Impact Assessment that failure to deconcessionalise would mean that:

“the current restrictions on transfer would remain in place which would artificially limit the proponent’s ability to enter into alternative arrangements, including offering the subject site for sale to raise funds for development elsewhere; a joint venture to realise a viable development on or off site and consideration of a range of additional and compatible land uses to support the re-establishment of a club premises on the subject site.”

It should have been possible by now for the proponent to come up with some alternative development scenarios rather than arguing, it seems, that they can’t do that until their lease is deconcessionalised.

(d) Whether the Territory should buy back, or otherwise acquire, the lease;

The outrageously low valuation provided by the proponent of \$250,000 for the land (about \$100 per square metre when struggling families have to pay \$900 or more per square metre to buy a home in Canberra’s outer suburbs), would result in a concessional payout amount of \$125,000. This valuation means that if approved, the ACT Government and tax/rate payers would be losing significant potential revenue while also losing the opportunity to use the land for other community purposes. It would arguably be more in the public interest for the ACT Government to re-acquire the lease.

(e) Whether the Territory wishes to encourage the continued use of the land for an authorised use under the lease by retaining the concessional status of the lease.

As advocated under (a) above, the concessional status of the lease should be retained pending the development of an agreed Master Plan for Manuka Oval and surrounding precinct.

In summary, the ISCCC contends that the proposed deconcessionalisation of the Canberra Services Club site in Griffith fails the public interest test and so DA 201732582 should not be approved.

Marea Fatseas
Chair
21 February 2019