



Deakin Residents Association

A garden Community for the Future

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The Director
Environment, Planning and Sustainable Development Directorate
ACT Government
GPO Box 158, CANBERRA ACT 2601

Dear Sir/Madam

ACT PLANNING SYSTEM REVIEW REFORM PROJECT – PROPOSED INTENSIFICATION OF POPULATION IN INNER SOUTH CANBERRA

The Deakin Residents Association (DRA) welcomes the opportunity to comment on the consultation document issued as part of the current Planning Review being undertaken by the ACT Government. DRA's objectives are to represent the residential, suburban, social and environmental qualities of Deakin, consistent with garden city principles. DRA is a member of the Inner South Canberra Community Council (ISCCC) and works cooperatively with fellow members and other resident and community groups.

The Planning Review

The DRA understands that one of the proposed outcomes of the review will be District Planning which will feed into possible changes to the ACT Territory Plan. Deakin will be included in District Planning covering the entire area of Inner South Canberra. The Review is reportedly going to take into account submissions received and comments made at district workshops organised by the Environment, Planning and Sustainable Development Directorate (EPSDD).

Comments have been sought, preferably interactively, on five principal themes guiding the Review namely, Compact and Efficient, Diverse, Sustainable and Resilient, Liveable and Accessible. The DRA has no issue with these themes - they are generalised and worthy statements - but does not think it particularly useful to frame our comments against them. They fail to address planning issues of concern to our community, concerns which we share with fellow ISCCC members and other groups. Our comments in this submission relate principally to issues affecting Deakin, in recognition of our suburb's unique role and status in the development of the National Capital, and its development and maintenance as a garden city. The remainder of this submission addresses the issues that we believe should be covered in the Planning Review.

Precinct Code for Deakin

DRA has been pressing for some time, for the development of a new and comprehensively consulted Precinct Code for Deakin. We believe such a Code could enable a holistic approach to future planning and development and mitigate against piecemeal, uncoordinated, and conflicting developments which are not in the best interests of Deakin residents. DRA is therefore generally supportive in principle of District Planning and Strategies that will guide and underpin the future development and operation of Canberra, as outlined in the Planning Review Project document. We are strongly in favour of improved planning processes which lead to certainty and stability and facilitate greater accountability and transparency. We have little information about how District Strategies are going to be developed. The DRA wants to know more about their function, coverage and intended legal standing.

For example, our Association wonders how District Planning will take into account existing Precinct Codes. Will it override or replace them? To what extent will District Strategies be enforceable? We also have

concerns as to whether the large scope and range of suburbs covered in planning for each District will be able to accommodate the needs of and differences between individual suburbs. The role and responsibilities of the Commonwealth, through the National Capital Authority also need to be recognised. This is of particular relevance to many Inner South Suburbs, including Deakin. The DRA wants to see more detail about District Planning.

Densification of Inner South Canberra

What is of greater immediate concern and has widespread concern among Deakin residents is the emergence of a document “Inner South District Consolidated Policy Plan” referenced in materials provided at one of the recent workshops conducted by EPSDD. This document includes a large, shaded area entitled “Light Rail Stage 2 Investigation Area” and is seen as signalling a proposed massive intensification involving almost half the existing residential area of the suburb as well as possible resumption of the Deakin ovals and surrounding greenfield space for development. This document raises the spectre of the possible development of high-rise buildings along Yarra Glen, similar to Northbourne Avenue.

We understand from advice provided to ISCCC from Louise Crossman, Senior Advisor Planning and Land Management, Office of Mick Gentleman, Minister, MLA that the term “Investigation Area” means just that and that no decisions have been made about the extent, location or type of urban infill or intensification. She also confirmed that the investigation area was confined to 800 metres on either side of the Woden Valley transport corridor, but “with variations” (whatever that means). We understand that consultants have been appointed to complete the investigation. and are working on the issue. There has been no information provided to residents about these consultants. The DRA believes that details of their precise role, including the Request for Tender, should be publicly available. We also want to know whether the consultants will be speaking with community groups.

The population “justification”

A brochure issued by Transport Canberra in August 2017, entitled *The Next Stage of a Light Rail Network for Canberra*, stated:

“Canberra’s population is projected to increase significantly over the next 20 years to over 500,000. It is expected that over 120,000 will work, and almost 90,000 will live and study within 1 kilometre of the Woden corridor by 2041. Planning for this growth will be vital to reducing congestion on our roads and providing commuters with a convenient, efficient and reliable alternative to driving their cars.”

The DRA challenges these population projections and considers that they need to be revised in the light of developments arising from the Covid pandemic, reduced immigration and Commonwealth Government policies regarding regionalisation, particularly of its workforce. Projections for Canberra’s population growth, which appear to be used to justify densification, are well above growth rates in recent years.

Deakin residents have clearly indicated their opposition to densification in a survey conducted by the ISCCC. We note the report of the recent “consultation” with the inner south community demonstrated that this opposition continues and is shared across the Inner South Canberra community

Densification

The Inner South Canberra urban landscape has been steadily changing over recent years. These changes have not always been for the better. They are occurring irrespective of, and in advance of, the advent of Light Rail and are already impacting directly and indirectly on Deakin. Examples include extensive redevelopment of the Curtin Shops, opening up of the Molonglo Valley and infill of surrounding areas. Other projects either announced or already in the pipeline include development of the Canberra Brickworks, resumption of the Curtin Horse Paddocks involving the creation of a new diplomatic estate and the proposed establishment of a new village along the southern side of Yarra Glen. All of these have serious environmental impacts and represent an ongoing loss of green space.

The DRA is keen to avoid a situation that occurred in relation to Stage 1 development of Light Rail where planners unilaterally proposed rezoning of an extensive area on either side of Northbourne Avenue to

enable increased intensive residential and commercial development. We note that details of this proposal generated substantial criticism and were withdrawn prior to the last ACT election. Proposals for densification in Inner South Canberra can be expected to have consequences at the next election.

Deakin – a garden city suburb

Deakin is a unique suburb with its origins firmly embedded in the historical development of Canberra as the National Capital. Its design and layout largely reflect Walter Burley Griffin and Charles Weston legacies relating to the development of a garden city. Residents of Deakin value these features. In normal times it is not unusual to see tourist buses driving visitors around the suburb to show case its unique qualities. At its 2017 AGM, former NCDC Commissioner Tony Powell, informed participants that many of the residential areas in Deakin, involving narrow, curved roads with extensive street scapes were developed with these principles in mind. He indicated that they do not lend themselves readily to redevelopment.

Deakin is home to important and historic national institutions such as the Prime Minister's Lodge and the Mint as well as several diplomatic missions and residences. Much of its residential sector is located within close proximity to the iconic Red Hill Nature Reserve. The recently announced Integrated Plan for Red Hill Nature Reserve and Surrounds, developed by EPSDD in response to a resolution of the ACT Legislative Assembly, has reaffirmed that the areas bordering the Nature Reserve and associated Open Urban Space are low impact residential areas and should be maintained as such with no change to current RZ1 Zoning.

Deakin also includes a substantial business area which precludes residential and many forms of commercial development. This area is close to John James Calvary hospital and has become a principal hub for medical and related allied health services. Development processes are currently in train that are likely to lead to a substantial expansion of these activities. These all create pressures on the residential parts of Deakin. Traffic problems are being experienced in Kent and Grey Streets. Yet developments are being approved without adequate consideration of traffic management.

Deakin sporting ovals

The Deakin sporting ovals and surrounding areas about the existing Woden transport corridor. Long term residents of Canberra remember the disastrous flood of early 1971 which resulted in substantial property loss and deaths in the Woden Valley corridor. DRA understands that one outcome was a decision to limit residential and/or commercial development in the flood prone areas along the corridor, and for some flood-prone land to be used as sporting ovals where the impact of any flash flooding would be less dangerous to property and human life. The sporting ovals remain a valued and much-loved resource and are used extensively by various sporting codes and schools. Sporting organisations have affirmed their opposition to any resumption of the ovals for development. Minister Chris Steel stated at the DRA's 2018 AGM that the these playing fields would be safe from development.

Most of the currently defined largely residential areas in Deakin as well as the Deakin Business Park, a large retirement village, the local shopping precinct, a community park, and sporting ovals including an important sporting field in central Deakin for the soccer community, fall within the hatched area specified in the Inner South District Consolidated Policy map. The DRA considers that the capacity for a significant population increase in Deakin is therefore very limited and would be highly undesirable.

Infrastructure

Other concerns raised by Deakin residents about the impacts of possible intensification include pressure on existing infrastructure including street access, sewers and drainage which would simply be unable to cope without extensive upgrade and/or modification. This would be expensive and disruptive. There would also be potential negative environmental impacts such as reduced tree canopy cover. Examples of inappropriate redevelopments in the inner south abound. The photo below of a current redevelopment in Narrabundah is a case in point. Overshadowing and loss of privacy are major concerns with intensification. Any intensification would require the provision of schools to be addressed. Schools in Deakin are at their limits.



A major issue arising from intensification concerns the impact of increased traffic levels. These are already surfacing in relation to expansion of the Business Park area. Bus services in Deakin were significantly reduced in the latest reorganisation. Getting around by public transport for Deakin residents has become more difficult. For example, direct or easy access to frequently visited areas such as the national institutions, employment hubs in the Parliamentary Triangle, Manuka, Kingston and Fyshwick has become complicated and/or is no longer possible. These sorts of difficulties encourage the use of cars.

Of particular concern is the assumption in some of the planning documentation that people would be prepared to walk upward of 800 metres to a kilometre to access Light Rail. This is nonsense especially for older residents. Street parking is another issue which is of increasing concern to Deakin residents, even in current circumstances. Parking restrictions have had to be introduced in some of our narrow suburban streets, and if Light Rail Stage 2 proceeds, parking at the Deakin shops is likely to be adversely impacted by park-and-ride.

Deakin does not have a single cycle path. The DRA has been seeking, unsuccessfully, for this situation to be rectified. The absence of dedicated cycle paths can be dangerous, particularly for children wishing to ride to school. The Planning Review needs to encompass issues such as this.

Conclusion

To summarise,

- DRA supports in principle the development of District Planning and Strategies as a mechanism to underpin an agreed coordinated approach future planning and development in Canberra, provided their provisions are enforceable, accountable, transparent, fully consulted with residents and accommodate differences between suburbs covered by District-level planning.
- The DRA wants clarity about the standing of existing Precinct Codes
- The DRA is opposed to rezoning for intensification that would bring dense infill and high-rise development into suburban areas of Deakin, to Deakin's sporting fields, or to Deakin's other green spaces. Such development would be unacceptable to residents and inconsistent with Deakin's unique status as a garden suburb. It would also be contrary to the heritage values of Deakin, an original Griffin designed suburb in Australia's National Capital.
- In light of the above, the DRA rejects any suggestion that, in the next planning stage for the light rail corridor, there is any scope for densification in the suburb. Residents of Deakin can be expected to respond at the next election to any plans for densification.

John Bell
President