

## Garden Community for the Future

PO Box 9056 Deakin 2600

[www.deakinresidents.asn.au](http://www.deakinresidents.asn.au)

### Comments on the draft Inner South Canberra District Strategy

The ACT Government has released a draft Territory Plan. The draft Territory Plan sets out a proposed statutory framework for the future development of the ACT, accompanied by six [check] District Strategies. The draft Plan is accompanied by several other documents, including District Plans and supporting documents. An objective running throughout these documents is increased intensification in residential areas.

The Deakin Residents' Association (DRA) believes that, in relation to the draft Inner South Canberra District Strategy, urban intensification should be rejected on economic, social, environmental, cultural and heritage grounds.

#### Urban intensification – comments on the Mecone report

The DRA believes that there is no case for the densification proposed for the Inner South and that the Mecone report<sup>1</sup> does not justify intensification along the Stage 2B Light Rail route. It is fundamentally flawed and does not provide support for the ACT Government to change zonings or other planning controls.

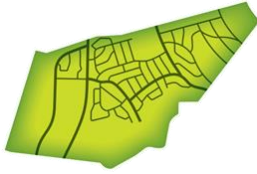
We note that the Mecone report presented a base intensification case and two additional intensification scenarios (medium and high). The report says that ***the existing planning framework (the 'base case' scenario) has significant capacity for growth***, from around 13,100 to 23,800 dwellings and from 31,300 to 78,900 jobs. The Mecone report also stated "... ***the need for catalytic changes to the planning controls in the Study Area is not considered critical when purely considering the capacity for growth that already exists in the (planning) controls***" (Mecone p 3).

The Mecone Report:

- did not examine the merits of intensification in a 2022-23 Canberra context
  - and so is a poor piece of research
- repeated the ACT Government's unsubstantiated claim that there is an increasing demand for people to live close to jobs and services,
  - an argument that has been destroyed by the pandemic experience
- admitted that additional infrastructure would be needed to support their forecasts for intensification
  - but says this was not within the scope of their project. This infrastructure includes water, electricity, schools, opens space, etc (Mecone p 4)
- recognised that green spaces and large canopy trees are highly valued by the Curtin community (Mecone p 17)
  - but makes no similar comments in relation to Deakin or Yarralumla.
- acknowledged that Yarralumla Creek is flood prone (Mecone p 41)
  - and observation that is not reflected in the reports intensification maps

---

<sup>1</sup> Mecone and Atlas Urban Economics, 2021, Canberra Light Rail Stage 2B, Urban infill capability assessment. A report to the ACT Government



## *Garden Community for the Future*

PO Box 9056 Deakin 2600

[www.deakinresidents.asn.au](http://www.deakinresidents.asn.au)

In relation to the ACT Government's claim that there is "an increased demand for the workforce and community to live within a '30-minute city, with homes that are close to jobs and services", no evidence has been provided to support this a claim. In the past, the '30-minute city' objective was claimed to reduce greenhouse gas emissions from internal combustion engines. The advent of electric vehicles makes a nonsense of this argument.

The '30-minute city' also fails to consider the increased mobility of the workforce, which results in frequent changes of workplace location. This objective also fails to reflect the frequent relocation of businesses and government agencies. The workforce is not going to move residences every time one of these relocation events occurs. To do this would involve significant transaction costs.

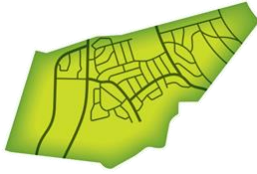
Nor does the '30 minute city' consider the dramatic change in work practice that occurred during the pandemic and which is continuing. Many people now work from home over the internet. They hold meetings on-line without attending their offices every day.

Some of the literature papers and reports supporting intensification are of poor quality, strong on unsubstantiated assertion and lacking hard evidence.

- Some arguments that have been used in the past are becoming outdated (e.g. Greenhouse gases emitted by cars are often cited as justifying intensification, but the advent of electric vehicles will soon make these concerns irrelevant)
- The increasing occurrence of working-from-home is not recognised, yet this cuts across the arguments about travel time and impact
- Urban heat island effects are rarely mentioned in papers advocating intensification. In suburbs like Wright, increased urban heat in summer as a result of climate change is going to be an issue
- Intensification is predicted to double the climate change costs for cities like Canberra (Troy, 2013)

Other findings from the literature include:

- Claims that higher housing density results in lower energy and water consumption are not supported by the evidence (Troy et al, 2005 & 2006). One reasons for this is that water consumption in apartment blocks is often not individually metered. As a result, there is no incentive to minimise consumption.
- Studies show that higher densities have not reduced car travel, nor have they increased the use of public transport (Mees 2009, 2013; Hall, [year])
- Higher density housing is less likely to use solar hot water or photovoltaic cells (Troy, 2013)
- Increasing density does not result in increased community engagement and there is more disputation between neighbours in higher density housing (Easthope, 2013)
- Advocates of intensification "are tone deaf" to the preferences of citizens (Cox, 2022).



## *Garden Community for the Future*

PO Box 9056 Deakin 2600

[www.deakinresidents.asn.au](http://www.deakinresidents.asn.au)

### **Comments on the draft Inner South Canberra District Strategy**

In relation to the draft District Strategy for Inner South Canberra, we provide the detailed comments in the following sections.

The DRA considers that the frequent references in the draft Strategy to Light Rail and in particular to Stage 2B are not warranted. Stage 2B has yet to receive environmental and Commonwealth Parliamentary approval. The statements about an east-west light rail spine on page 96 is one example of the more absurd lengths that this document goes in relation to light rail.

We note that electric buses could deliver the same environmental benefits as light rail, at a fraction of the cost and without damaging national capital heritage values.

We also **doubt** that Light Rail will be an improvement to public transport and note there are currently 19 bus stop location in Deakin serving bus traffic in both directions. Light Rail will have only two to service the residential area of Deakin. We fear the bus service will be downgraded if Stage 2b is ever built.

The light rail program proposes that residents within 800 m of the stop should walk to it. We note that the footpaths in Deakin are narrow, irregular and often absent altogether. There are no bikeways running through the residential part of the suburb. If there were it could encourage schoolchildren to use them. DRA urgently seeks fixing the footpaths. fixing the crossings and the building of bike routes to schools along with good, consistent, universal bike infrastructure.

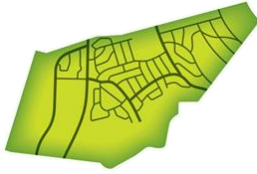
### ***Cultural and Heritage issues***

The Minister's Foreword claims that the District Strategies "will enhance and protect the defining characteristics of each district". However this is certainly not the case for what is proposed in the rest of the document.

For example, the suburb of Deakin was largely designed by the Griffins. Its layout reflects their interpretation of the Garden City concept. Deakin is one of the few Canberra suburbs where the Griffin influence can be seen. As such, Deakin is part of the Griffin heritage and should be protected from development. Its major roads - Adelaide and Melbourne Avenues, are important features of the Griffin Plan. However other roads in Deakin were not designed to carry the sort of traffic that will come about from redevelopment and intensification.

Deakin is of historical importance in the development of Canberra, which gives it significance as a tourist destination and economic benefits it brings to the Canberra economy. People take organised bus tours around Deakin to view its buildings, streetscapes and gardens. No one will be interested in visiting a suburb of uncoordinated high rises etc. which is just like anywhere else.

The section in the draft Strategy on future possibilities for light rail in the south Canberra (pages 96 and 97) claims that housing diversity will respect Canberra's Garden city character. We reject this claim. Light rail will do nothing for inner south Canberra's Garden City character. To suggest that installing light rail along Adelaide Avenue will make it a green boulevard and lead to better connections between Deakin and Yarralumla is fanciful.



## *Garden Community for the Future*

PO Box 9056 Deakin 2600

[www.deakinresidents.asn.au](http://www.deakinresidents.asn.au)

We are opposed to turning Adelaide Avenue into another Northbourne Avenue even if it were possible. Both sides of Adelaide Avenue are occupied by embassies and schools, neither of which are likely to be replaced through intensification. To claim that intensification of Adelaide Avenue will enhance the local environment is not supported by any evidence we have seen.

West Deakin provides office space for national organisations and embassies as well as medical facilities. Deakin itself is also home senior embassy personnel. The suburb houses significant schools.

### ***Environmental issues***

The draft Inner South Canberra Strategy claims that one of its “5 big drivers” is a “blue green network”. The document goes on to say that vegetation, nature reserves, open space, water elements and cultural heritage elements are (to be) protected and provide the setting for a city ‘in the landscape’”. This is something that the DRA fully supports. However this driver is not recognised in much of the rest of the document.

Although strategy purports to be part of a blue-green network/biodiversity corridor, bizarrely it seems to stop at Yarralumla side of Adelaide Avenue and there is no continuation of that corridor across to Deakin towards Red Hill Reserve. The only other “blue green” corridors marked in the area seem to be main roads. The ACT bird emblem, the vulnerable Gang Gang, needs every support to face the threats that challenge it. The Strategy should provide real connectivity of habitat.

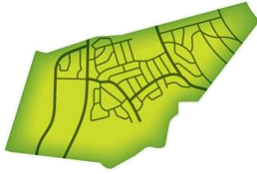
Increases in density come with significant environmental costs. Apartment buildings in Canberra are excessive consumers of energy. Laundry gets dried in electric dryers. Often, windows cannot be opened to allow air flow. Apartment buildings rarely have eaves or other architectural features to limit sun and heat incursion. Very few apartment buildings in Canberra have rooftop solar energy or solar hot water. Very few apartment blocks have provision for charging electric vehicles.

The construction of apartment buildings results in loss of tree cover. Developers in Canberra are in the habit of completely clearing sites of trees before construction commences. Landscaping plans promise minimal plantings which are not verified post construction. The result is that apartment buildings contribute to heat island effects, resulting in their increased use of air conditioning.

Urban heat island effects from intensification should now be much more in focus. Yet urban heat island effects are rarely mentioned by intensification advocates. High density urban development, with large buildings, concrete and pavement, exacerbates the problems arising from extreme summer temperatures. A CSIRO study shows that maximum summer temperatures across Canberra suburbs can vary by as much as 10 degrees. For example, Wright, where the tree cover is a mere 2.2 per cent, does not even have the space between buildings to increase the green canopy. Trees are the most important tool for reducing the heat island effect, providing shade and absorbing solar radiation. There is no way that the Government’s aspirations for a greater than 30 per cent tree cover will be achieved with increased densification.

### ***Economic issues***

The DRA believes that the proposed rezoning cannot be supported on economic grounds. There are several reasons for this.



## *Garden Community for the Future*

PO Box 9056 Deakin 2600

[www.deakinresidents.asn.au](http://www.deakinresidents.asn.au)

The draft Strategy offers no details or plan for the orderly transition from what is largely single-family dwellings to a denser suburb. In the absence of such a plan, there will be a mishmash of redevelopment activity that will lead to sub-optimal outcomes. This is already happening in the suburb's RZ2 zone. The result will be that some existing houses will become stranded assets, surrounded by multistorey buildings but unable to be developed because of site constraints.

Many existing homes in Deakin are of comparatively recent construction. In the quest to achieve higher density, the demolition of the existing housing stock is likely to occur well before the end of its useful life. As a result, the expected economic benefits from the construction of existing housing stock will not be realised to the extent that building owners had hoped. In addition, from previous experience we know that existing residents will face increased rates as a result of redevelopment pushing up land values.

The cost of upgrading existing infrastructure to accommodate intensification is often overlooked by advocates of intensification. This can require excavations to replace storm water and sewer pipes as well as the provision of additional electric wires and substations. Upgrading these services can be very disruptive for existing residents.

Redevelopment imposes additional costs on people living in areas being redeveloped. These costs unfairly fall on individual residents, many of whom are likely to be forced out by redevelopment activity. Developers, on the other hand, will secure windfall gains from the proposed rezoning.

### ***Social issues***

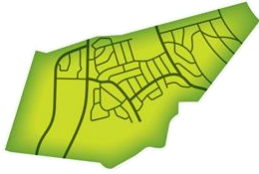
It is well known that Canberrans prefer to live in homes on individual blocks of land (ACT Govt, 2019; ISCCC, 2019-20). This is confirmed by several surveys over the last decade. There are some good reasons for this. For parents with young families, the Australian backyard offers a safe and easily supervised place for children after school. For other households, the opportunity to enjoy a garden is something that is valued.

Denser developments, on the other hand are seen as having some significant downsides:

- Canberra developers have a poor reputation in regard to the quality of construction and unwillingness to address problems.
- Bodies corporate are frequently a serious problem for owners. Disputes over modifications, maintenance, noise problems and parking. This is widely seen as a disincentive to apartment living.
- Privacy issues are also a concern for apartment dwellers.
- Securing in open parking under apartment blocks is a problem with frequent reports of vehicle break-ins

Unless the ACT Government takes measure to address these problems, apartment blocks will remain an unattractive option for Canberrans.

Transport is an important consideration in urban planning. While the objective of improving walkable access to daily necessities ((big issues 5) is welcomed, it needs to be recognised that for some in our community, this is not practical. For some, their age or their distance from shops makes

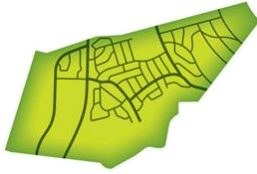


## *Garden Community for the Future*

PO Box 9056 Deakin 2600

[www.deakinresidents.asn.au](http://www.deakinresidents.asn.au)

this impossible. Accessible public transport is important, but expecting residents to walk 700 metres to catch light rail is ridiculous. Some parts of inner south Canberra have very few bike paths.



## *Garden Community for the Future*

PO Box 9056 Deakin 2600

[www.deakinresidents.asn.au](http://www.deakinresidents.asn.au)

### **Deakin local centre**

The Deakin shopping centre is important to local residents. Any redevelopment of the centre needs to recognise the particular problem posed by Duff Place, which is very narrow. The draft Strategy gives no indication as to how any redevelopment will come about or details of the time scale for this to happen.

Redevelopment would need to be agreed with the businesses in the centre and staged so as to ensure their continuity of operation.

Parking is already a difficult issue and more likely to become so if the light rail 2B stop goes ahead.

### **References**

- Troy P, 2013, Consolidation policy and its Effects on the City, accessed at <https://soacconference.com.au/2013-conference/wp-content/uploads/2013/12/Troy-Consolidation-Structure.pdf>
- Neumann M, 2005, The Compact City Fallacy, Journal of Planning Education and Research, 25, pp11-26
- Hakner J, 2017, Heat island' effect could double climate change costs for world's cities, University of Sussex, accessed at <https://www.sussex.ac.uk/broadcast/read/40429#:~:text=Professor%20Richard%20S.J.%20To%20MAE,of%20uncontrolled%20urban%20heat%20islands>
- Troy P, Holloway D, & Randolph B, 2005, Water Use and the Built Environment: Patterns of Water Consumption in Sydney City Futures Research Centre Research Paper No. 1. Sydney: UNSW City Futures Research Centre, accessed at <https://cityfutures.adu.unsw.edu.au/documents/34/waterconsumption.pdf>
- Troy P, Holloway D & Nissen K, 2006, Domestic Water Consumption in the ACT for the Office of Sustainability, Chief Minister's Department ACT
- Mees P, 2009, Transport for Suburbia; beyond the automobile age, Earthscan, London
- Mees P, 2013, A Centenary Review of Transport Planning in Canberra, Australia, Progress in Planning, 87, pp 1-32
- Hall P, 2001, Sustainable cities or town cramming? In Planning for a sustainable future, Eds A Layard, S Davoudi, & S Batty, London.
- Easthope H, 2013, The role of Retirees in Residential 'Private Governments', City Futures Research Centre, Faculty of Built Environment, UNSW
- Sandford D, 2022, Suburban heat – an analysis of the suburb of Wright, Alastair Swayn Foundation, accessed at <https://alastairswaynfoundation.org/funded-research/suburban-heat/>
- ACT Government, 2019, Places and Spaces survey, accessed at <https://yoursayconversations.act.gov.au/yoursay-community-panel/places-and-spaces-survey-results>
- ISCCC, 2019-20, Inner South Canberra, Community Values, Interests and Concerns survey, accessed at <https://www.isccc.org.au/isccc/wp-content/uploads/FINAL-Report-ISCCC-Survey-12May2020.pdf>

George Wilson AM

Vice President

[www.deakinresidents.asn.au](http://www.deakinresidents.asn.au)

Ph 62812160