



Outcomes and Issues from the 14 February 2023 Public Information Session on the NEW ACT PLANNING FRAMEWORK

The New Planning Framework comprises the: Planning Bill 2022 (consultation closed November 2022), District Strategies, New Draft Territory Plan, District Specifications, Technical Specifications, Housing Design Guide, and Urban Design Guide. Submissions on these close on 3 March 2023.

SUMMARY

1. High rise, high density urban infill, to meet the requirement of 70% of new dwellings being in existing urban areas is set out in the District Strategies.
2. The low rise, low density character of Yarralumla and Deakin that is highly valued by residents should be retained, together with its heritage and biodiversity.
3. Further densification of Deakin and Yarralumla is not supported.
4. The scale of redevelopment proposed for Yarralumla and Deakin in the Inner South District Strategy, is excessive, with 30%-50% of the area of the suburbs to become 3-6+ storeys apartments.
5. The Canberra Brickworks development underway and proposed CSIRO Forestry redevelopment in Yarralumla will add 730 new dwellings, a 50% increase, - further infill is not warranted.
6. Compulsory acquisition of existing properties in Deakin and Yarralumla appears necessary for large scale demolition and redevelopment of areas, including the construction of new roads.
7. The Adelaide Avenue redevelopment, to form the new urban core-urban centre of 6+ storey apartments, requires acquisition of the Diplomatic Embassy Precinct (Saudi, Nigeria, Sri Lanka & Italian Embassies) which is Commonwealth Land, and Canberra Girls Grammar school.
8. The new planning framework will not provide certainty or predictable outcomes, hence will only allow for development. The approach is complex, with many interrelated, "moving parts", relies on non-statutory supporting material for assessments, and has conflicting outcome requirements (e.g. urban infill and mitigating urban heat).
9. Consultation has not been good practice (s11 Planning Bill 2022). Community feedback from the 2021 district planning consultation for the Inner South has been ignored (Draft Inner South District Strategy Page 91) and these issues remain. Community views now need to be genuinely considered.
10. The current planning framework requires the National Capital Authority to be engaged on the proposed changes including those to the National Capital Plan. This is not evident.

Outcomes and Issues

Densification of Deakin and Yarralumla

Densification of Deakin and Yarralumla proposed by the ACT Government is not supported. Over 200 residents attended the 14 February 2021 meeting and 97.5% did not support further densification and 2.5% supported limited densification of Deakin and Yarralumla.

ABS Census 2021:

Yarralumla 1420 dwellings 65% separate houses of 1 or 2 storeys (RZ1) 27% semi-detached or townhouses (RZ2) 80% 3+ Bedrooms	Deakin 1,345 dwellings 68% separate houses of 1 or 2 storeys (RZ1) 18% semi-detached or townhouses (RZ2) 77% 3+ Bedrooms
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The scale of change proposed in the Inner South District Strategy for Yarralumla and Deakin is excessive. The redevelopment proposed is for 30%-50% of the area of the suburbs to be 3-6+ storey apartments. This does not retain or protect the low rise, low density character of the two suburbs that is highly valued by residents.

The proposed scale of change does not align with the proposed RZ1 and RZ2 zoning:

<i>Residential Zones Policy in Draft New Territory Plan 2022</i> <i>RZ1 – Suburban Zone</i> <i>The fundamental desired outcome for the RZ1 zone is to achieve and/or maintain low density residential neighbourhoods in suburban areas.</i> <i>RZ2 – Suburban Core Zone</i> <i>The fundamental desired outcome for the RZ2 zone is to facilitate development or redevelopment of sites within reasonable proximity to local services to achieve a mix of low to medium density housing.</i>

For Yarralumla the redevelopment of the Canberra Brickworks site, already underway, together with that of the CSIRO Forestry site, will add 730 dwellings to Yarralumla an increase of 50% together with commercial and retail space, hotel and aged care facilities. Further densification beyond this is not warranted.

The proposed high rise, high density urban infill, to meet the requirement of 70% of new dwellings being in existing urban areas, shifts the urban core and urban centres of Yarralumla and Deakin to the sections adjacent to the Adelaide Avenue Expressway, whereas the communities' heart and focal point is the two shopping centres.

The proposed changes to RZ1 and RZ2 zoning will provide for 90m² secondary dwellings, basements and for building coverage up to 70% of a compact block, which will create heat islands not as required in the draft Territory Plan, mitigate climate change impacts.

Adelaide Avenue

The Inner South District Strategy proposes major change to the function of Adelaide Avenue and its surrounds:

“Transforming and humanising Adelaide Avenue - With the integration of light rail, Adelaide Avenue could be transformed. This area is currently dominated by a wide roadway and is challenging for pedestrians to cross. In future, Adelaide Avenue could be a vibrant, multimodal corridor that better connects into local neighbourhoods in Yarralumla and Deakin.”

This does not recognise that the existing road is an pedestrian free, arterial expressway, that has many cuttings and embankments, and there is good connectivity between the two suburbs by roads that go over of under Adelaide Avenue. Nor does it recognise the Commonwealth responsibility for this Designated Area and National Land.

Outcomes Based Approach

The proposed **framework has many “moving parts”** and also relies on non-statutory supporting material in its assessments, including the “Technical Specifications”.

Non-statutory supporting material used in assessments, has no legal standing and hence is not material to any legal review process.

There are many competing or conflicting requirements from the broad range of policies and outcomes (e.g. urban infill and mitigating urban heat).

The elements are interrelated and as such there is no clear hierarchy for assessments.

Assessments are qualitative and focussed on broad outcomes rather than a quantitative , measurable approach.

This approach cannot produce consistent and predictable planning outcomes and will create uncertainty for proponents and interested parties, and is unlikely to be streamlined or efficient.

The New Planning Framework will **provide for development**.

Inner South District Strategy – Areas for New Housing, Change Areas and Sustainable Neighbourhoods

The proposals in the District Strategy for the future development of Yarralumla and Deakin does not recognise, and bears no relationship to, the existing built environment (residential, community, commercial, and retail) and the road infrastructure and street network.

The proposed densification and redevelopment of Yarralumla And Deakin could not be undertaken without **large scale procurement and demolition of the existing built environment** and loss of public open space. This would include existing schools, child care centres, houses, shops, schools and Embassies, and result in the loss of endangered species and habitat. It would also require the acquisition of Commonwealth land, approvals of the National Capital Authority and changes to the National Capital Plan.

This raises the question as to whether the ACT Government is intending to use **Compulsory Purchase** of Residential and Commercial Blocks to effect such large scale redevelopment.

The proposals are a **plain sheet of paper Greenfields approach** to redevelopment in an existing populated urban residential and commercial environment, that is a Brownfields site. This raises a number of major issues outlined below.

National Capital Authority and National Capital Plan

Adelaide Avenue, from State Circle to the Cotter Road flyover is a Main Avenue, and the land adjacent to it, is a Designated Area and a Commonwealth responsibility under the National Capital Authority and National Capital Plan.

The proposed Adelaide Avenue redevelopment, to **high rise, high density**, includes the Yarralumla and Deakin Diplomatic Precinct which is National Land (Commonwealth) and also the responsibility of the National Capital Authority. This Diplomatic Precinct currently comprises the Embassies of Saudi Arabia, Nigeria, Sri Lanka in Yarralumla and that of Italy in Deakin. The Canberra Grammar School in Grey Street Deakin, currently zoned “Community Facility”, is also in this area for redevelopment is an endangered grasslands habitat.

Deakin Local Centre and West Deakin

The proposal for the “Deakin Local Centre” provides for a complete redevelopment of the Shopping Centre and the area adjacent to Hopetoun Circuit:

“Deakin will be a high amenity centre, with renewed streets and a new community heart offering a variety of services and facilities for locals and people from further afield, with safe pedestrian access to light rail.”

This proposal puts new streets through existing dwellings, “creates regular urban blocks of one hectare or less”, and realigns existing streets into a grid pattern.

The proposed approach in West Deakin:

“West Deakin will be a high employment hub, walkable grid structure, parks and safe pedestrian access to light rail.”

This is similar in terms of imposing an grid street pattern on a commercial area that has curved streets and crescents. Strickland Crescent is removed and two new Streets created.

In the residential area of West Deakin, between Kent Street and Adelaide Avenue, the proposed connection of Kintore Circle in Yarralumla to complete the circle in Deakin would involve acquisition and demolition of many residential and other buildings.

The proposed creation of a Local Park at Block 2 Section 35, Deakin would require the demolition of the recently developed Equinox Business Park which has a Gross Floor Area of 25,000m² parking for 569 vehicles and 80 Bicycles, and a 5 Green Star Rating.

These **outcomes do not align with the intent of the District Strategy** for the Inner South or the New Planning Framework.

Consultation

The approach to consultation on the New Planning Framework does not meet the out the principles of good consultation as set out in the new Planning Bill 2022

s11(d) consultation is meaningful if—

- (i) information provided as part of the consultation is adequate to ensure all stakeholders understand the subject of, and issues relating to, the consultation and can give informed responses; and*
- (ii) it genuinely seeks community feedback; and*
- (iii) community views are genuinely considered and incorporated into final decisions*

Consultation on the New Planning Framework that comprises over 2,500 pages has been scheduled to occur over the School Holiday and Christmas New Year holiday period thereby limiting the opportunity for community input.

Not all the elements of the framework have been provided, for example there are no Design Guides, rather an” Explanation of Intended Effects for: ACT Urban Design Guide ACT Housing Design” has been provided. Some are incomplete for example there is no Precinct Map for Yarralumla, although there is one in the current Territory Plan.

The ACT Government advises:

“The proposed (Territory) plan does not include major changes to current zoning.”
(At a Glance - proposed Territory Plan https://hdp-au-prod-app-act-yoursay-files.s3.ap-southeast-2.amazonaws.com/3216/6728/5394/Snapshot_Territory_Plan_Overview.pdf)

It is not made clear that in order to “give effect to the District Strategies in the Territory Plan” as required by *s47 Planning Bill 2022* major changes to the Territory Plan and zoning will be required.

The residents of Deakin and Yarralumla are thus likely to be under the misapprehension that the zoning will not be changed to provide for major densification with 30 to 50% of the area being 3-6+ storey apartments. This is misleading.

The information provided in the Inner South District Strategy for the future development of Yarralumla and Deakin does not explain how such major redevelopment will be undertaken and as such is not adequate.

The feedback from the community for Inner South District from the district planning consultation in 2021 have not been taken into account including:

Draft Inner South District Strategy (Page 91)

- 1. Development to be in keeping with existing character*
- 2. Balance urban infill with existing character and amenity*
- 3. Encourage growth of large trees, maintain shade trees and increase tree planting*
- 4. Make sure housing diversity caters for ageing in place, affordable housing and family homes with large blocks.*

https://hdp-au-prod-app-act-yoursay-files.s3.ap-southeast-2.amazonaws.com/7716/6848/3097/Draft_Inner_South_District_Strategy_-_08.11.22.pdf

Overall community consultation has not met good practice, and community views now need to be genuinely considered.