

8 December 2003

Ms Trina Stiff  
Urban Projects  
ACT Planning and Land Authority  
16 Challis Street  
Dickson ACT 2602

RE: Submission to the Draft City West Master Plan

Dear Ms Stiff

We appreciate your commitment to public consultation and thank you for the opportunity to respond to the Draft City West Master Plan.

Northside Community Service is a regional community service currently providing over 40 diverse programs and services to the ACT. Northside currently operates the Civic Early Childhood Centre located in the Childers Street precinct we therefore have a strong interest in the Plan.

Our response to the Draft Plan has been developed with consultation and discussion with various stakeholders including but not limited to the following:

- Northside Community Service Inc's Board of Management, Staff & Volunteers
- Service users of the Civic Early Childhood Centre
- Residents of Childers & Kingsley Streets (ROCKS)

Thank you for your consideration of our comments. I am happy to make myself available at any stage to meet and discuss any aspect of our submission with you. Please feel free to contact me on 62572255 to arrange a suitable time.

Yours Sincerely

Stephen Larcombe  
Chief Executive Officer

## **Overview**

Northside Community Service Inc. (NCS) commends the establishment of the Draft City West Master Plan (the Plan). It has established a comprehensive framework for planning and development in City West. The Plan is responsive and flexible, addresses many key issues, and is an important step towards meeting the needs of the area and promoting sustainable futures. We are pleased that the Goals and Objectives for City West are focussed on identifiable community spirit, sustainability and 'leading edge' values.

NCS recognises several acknowledgments in the Plan of the contribution of community activity to the life and character of the area, and the need for community facilities in City West. This acknowledgment and related community facility strategies are a good start to ensuring community vitality remains and grows in City West.

The vision for the Childers Street Precinct is supported. The qualities of mixed-use development, a range of community facilities, a relatively low cost business environment and a lively street character will create a great ambience and junction between the ANU and the City.

NCS however, has several concerns about the Plan which are discussed in further detail in the following submission:

- The proposals contained in the Plan for community facility provision lack the clarity, vision and detail needed to assure NCS and other community groups that the communities legitimate needs will not be sacrificed to satisfy business interests.
- Timing, siting and expected space provision for community facilities under the Plan is unclear and uncertain.
- The opportunities for lower income households to live in affordable housing within City West is not ensured by the outline of the proposed Territory Plan Variation.

NCS recommends the development of strategic planning framework for community facility provision in the City West in consultation with the community. Such a process would reflect a firm commitment by Government to work in partnership with the community sector to provide a leading edge model of community facility provision.

NCS would also encourage a stronger link to the Government's Canberra Planning (Social, Economic & Spatial Plans) process.

## **Childers Street Precinct**

NCS appreciates that the Lease and Development Conditions (L&DC) for sites within the Childers Street Precinct may be developed subsequent to the Final Plan, but wishes to register the issue for discussion and progression in the interim. L&DC will form the basis of the controls for developers and determine the type of development on each site. These conditions must be carefully structured to ensure community facility needs are met, and the size, density and site uses and other factors meet the needs of the community and are sustainable and harmonious.

Comprehensive, yet flexible Lease and Development Conditions and Precinct Guidelines will provide greater security for all parties and support work towards ensuring the stated planning outcomes and needs are fulfilled.

Proposed Guidelines in the Plan for the Childers Street Precinct establish some broad parameters that can inform development (pp.86-87). These require further expansion and detail along the lines of the General Guidelines (pp.92-95) to ensure the desired outcome is agreed and achieved. For example, the Precinct Guidelines could encourage integration of public art in buildings and landscapes, visible and educational 'sustainability' devices/systems and integration of productive gardens.

Furthermore, to the best of our knowledge ACTPLA is not required by law to obtain community consultation on new L&DC. Only L&DC that are amendments need to be publicly notified. The conditions should be drafted, made available for comment and publicly notified prior to completion to ensure they provide sufficient control and flexibility for development on each site.

### **Provision of Community Facilities**

NCS is again pleased and supportive of the broad commitment to "Community development by establishing a framework for mixed use development and allowing for appropriate community facilities to be progressively provided" (p vi). We strongly believe that the provision of appropriate community facilities is a vital aspect of the development of a sustainable and diverse community.

In principal the document has a commitment to community facilities but fails to provide any process to how this will be delivered over the 30 year time frame. The Plan proposes to assess the need for community facilities at the time of land release, developers will be required to provide community facilities as an integrated part of the development (p 63).

We are particularly concerned that the plan provides no visual link or outline of land sale and development conditions. Consequently you could conclude that if the provision of community facilities is not included in the land sale condition then no community infrastructure will be built irrespective of what the Master Plan states.

Although we are supportive of ensuring that any physical infrastructure paid for by public funds is contemporary and adaptable in design to meet the changing needs and users of the community overtime, the concept of assessing the need at land release stage is short sighted and lacks a strategic focus. This could be interpreted as a lack of commitment and planning for community infrastructure.

We have and continue to participate in a wide range of consultations on community needs including the Community Facilities Needs Assessment Issues Paper (PLAM), Community Facilities Asset Management Strategy (DDHCS), Neighbourhood Planning and the key Government Plans (Social, Economic, Spatial etc, etc).

With direct relation to the Childers Street precinct we have participated in the ROCKS project and attended several forums. Our point here is that you could presume that significant resources have already gone into assessing the needs of the community and that this could translate into some firm/estimated commitment to the community for discussion.

The land release time table identifies 2<sup>nd</sup> and 3<sup>rd</sup> Priority block sales in Childers precinct by 2007, this is not an extensive time frame in the context of the proposed scale of development, given this and the above it should not be an unreasonable expectation that a more detailed or descriptive framework could be provided for comment and consultation.

NCS is concerned that there is no criteria/framework for space allocation for community facilities under the Territory Planning variation (b1). This means that the community shall lose land currently zoned community facilities with no assurance that composite or greater facilities shall be replaced/provided.

NCS strongly requests that the Plan identify processes for determining community facility requirements and the development conditions needed to ensure a commitment to the provision of community facilities be established in the transformation to a mixed purpose development zoning.

### **Civic Early Childhood Centre – Alinga/Childers Street Park**

The Plan currently proposes to develop a park on this site by 2013 (p 50). The only reference to Civic Early Childhood Centre is on this page and states “The child care centre could continue to operate in the park. This would enhance the activity around, and safety of, the child care centre.” (p 50)

The current and future need for early childhood development and associated facilities is well documented. At Northside Community Service’s alone, we have over 300 families on our waiting list for care (over two (2) centres including CECC). The Civic Early Childhood Centre has successfully operated on this site for many years and is currently under going some redevelopment to increase the supply of care to the community.

The discussion of childcare appears not to fully comprehend the extensive demand for access to services. The proposed capital works program does not address the need to replace the existing Childcare centre, nor does it consider the expansion of facilities to meet this need.

There is concern within the community that the government intends to redevelop the site and not replace the existing Childcare centre. There is no visible link or requirement to replace the Childcare centre across the various layers of plans to potential development and/or land sale conditions. To ensure security of tenure for the longer term provision of care we feel that it is critical to identify and secure this in the Plan

The recent demolition of the adjacent community facilities combined with delays in the proposed redevelopment have heightened this concern.

### **Affordable Housing**

An important objective of the Plan is providing opportunities for affordable housing. There is a significant housing affordability problem within the ACT that will require extensive subsidies or concessions to generate supply responses. The proposed Variation to the Territory Plan, to include affordable housing in the Written Statement of objectives, in addition to the b1 policy objectives, is supported. It must be recognised that this measure will not in itself ensure that projects are developed and maintained for long term community benefit. Substantial market intervention, planning or development concessions or arrangements will be needed to generate any major affordable housing response.

The Plan (in the discussion of affordable housing and redevelopment incentives) provides a useful start to documenting the range of incentives that will be needed for affordable housing, to create housing opportunities for long term residents in the precinct, but does not go far enough to translate the options into measures that will be implemented or provided.

The development of more specific planning and development controls, for example, through density bonuses, height concessions, adjusted plot ratios etc, have not been promulgated for particular sites or areas as options for affordable housing concessions in the planning for the precinct. The sale of sites to social housing providers, or the use of development levies to fund affordable housing also require further development.

The concessions under which affordable housing is to be developed should be included as formal Performance Measures under the Territory Plan to support the implementation of the affordable housing objective.

- A framework for community benefit through affordable housing and incentives for devitalisation must be formalised and public, in order that public confidence and integrity is maintained in the planning system.
- Where concessions are provided (including in lease and development conditions) there should be a requirement for public reporting of individual concessions granted.
- The framework should seek to transfer community benefit (eg affordable housing) to long term community ownership so that the benefits of concessions are captured.

### **Land Release Conditions & Time Table**

As stated above the land release time table identifies 2<sup>nd</sup> and 3<sup>rd</sup> Priority block sales in Childers precinct by 2007.

A key issue is that there is no visible link between the Master Plan, Territory Plan and Land Sale development terms and conditions. Consequently you could conclude that if the provision of community facilities is not included in the land sale conditions then no community infrastructure will be built irrespective of what the Master Plan states "it is a flexible document over time"