

From: Gordon Soames [cgxs@apex.net.au]

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To: Committees

Subject: Standing Committee Planning and Environment Inquiry into Draft Variation 236

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 11/5/05

Dr Hanna Jaireth
 Committee Secretary
 Standing Committee on Planning and Environment
 Legislative Assembly of the ACT
 GPO Box 1020
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Dear Dr Jaireth,

Your letter dated 27 April 2005 seeking submissions to the Standing Committee's inquiry into *Draft Variation to the Territory Plan No. 236: City West - Commercial A Civic Centre Land Use Policies, Exemption of Preliminary Assessment and Part D - Definitions* reached me yesterday, forwarded from the addressee (The Convenor, PACTT). Unfortunately, the Convenor of PACTT was not able to deal with this matter because of ill-health.

Obviously, there is insufficient time for a considered PACTT submission, since submissions are required by tomorrow and it was not possible to write and circulate a draft submission to all PACTT affiliates within 24 hours.

However I make the following personal observations on the Draft Variation:

The proposed variations are put forward as being consequential upon the City West Master Plan (pp. 3 and 5 of the Draft Variation), the Statement of Planning Intent (p.3) and the Spatial Plan (p.4).

The links between these documents and the Draft Variation are remarkable for their lack of factual and logical content. If the Draft Variation is to show the need for variation of the Territory Plan in some rational way (for instance by a cost-benefit analysis) it fails. Instead, the Draft Variation seems to rely mostly on rhapsody in order to show the need for a variation. In relation to the documents mentioned, this is illustrated by reliance on words and phrases of uncertain denotation but large, vague connotation;

- City West Master Plan - *sustainable development (p.5), higher quality design and greater community participation (p.5), conceptual approach (p.6), planned enhancement (p.6), strengthen the City as the heart of Canberra (p.6), create a vibrant 'mixed use' area and active pedestrian areas (p.6)* etc.;
- Statement of Planning Intent - *streamlining the planning system (p.3), simplify the planning process and be more efficient (p.3)*, and
- Spatial Plan - *vibrant, robust and culturally stimulating city centre (p.4), flexible land use controls and to remove restrictions that slow development timelines (p.4), revitalisation of Central Canberra (p.5)*

In the context of a planning document, the meaning of these words is moot. What does "vibrant" (which occurs five times in the Draft Variation) actually mean in the planning context? Or "revitalisation" or "culturally stimulating" or "streamlining" or "heart of

Canberra", or any of the others? Do we need to be culturally stimulated because we are barbaric? Do we need revitalisation because we are dead?

In the resulting absence of any clear rationale for the proposed variations to the Territory Plan, the variations can only be evaluated on their face value, in terms of the views which anyone may have on the role of central Canberra and on the process of changing the Plan.

No evidence of a desperate shortage of office space in central Canberra is put forward which would justify such a large expansion of Commercial A zoning as would result from the proposed variations. Very large areas of office space are being constructed adjacent to the Canberra Centre, and it has been speculated that movements into that site will leave other buildings vacant (Canberra Times, 7 May 2005, p.1). Without evidence of need, the variations should not be approved.

No estimation of the impact of the proposed variations on other Canberra town centres (Gungahlin, Belconnen, Woden, Weston, Tuggeranong) is provided. It would appear *prima facie* that such large expansion of Civic office space is likely to stunt the development of these other centres. This in turn would tend to vitiate the multi-centre basic plan of Canberra. Without an estimate of the impact on other town centres and the overall multi-centre plan, the variations should not be approved.

No estimation of the impact of higher buildings (as proposed on p.11) on shading of the street, ground-level wind speeds and pollution concentrations is provided. There are real risks that higher buildings will create pedestrian walkways and spaces which are chilly, windy and polluted with ozone and carbon monoxide from car exhaust. It is unlikely that "active frontages" as described on p.20 could exist in such conditions. Atmospheric inversions (mostly in winter) in Canberra have led in the past to high concentrations of carbon monoxide and small particulates in Civic (see ACT State of the Environment Reports for 1997 and 2000). This observation is particularly relevant to the proposed amendment of Schedule II.1 of the Appendix II (Territory Plan) exempting Gross Floor Area and height restrictions for buildings in Commercial A Civic Centre Land Use Policy. It is probably only through the existing provisions of the Territory Plan for a Preliminary Assessment that the likely impacts of higher buildings on wind speed, shadow and pollution are likely to be discovered. In the absence of any independent estimation of higher buildings on wind speed, shadow and pollution outcomes of development, the existing requirement for a Preliminary Assessment should remain.

Thank you for drawing this inquiry to the attention of PACTT.

Yours sincerely,

Gordon Soames