

The Secretary,
Standing Committee on Planning, Environment and Municipal Services,
Office of the ACT Legislative Assembly.

Draft Variation to the Territory Plan No. 308 Cooyong Street Urban Renewal Area

Thank you for the opportunity to make a further submission on this redevelopment. I note that, of the 137 submissions received during the ACTPLA DV308 consultations, only 4 submissions were in favour of the redevelopment in its proposed form.

I have grouped my initial comments under the headings suggested, although there are considerable overlaps:

1. whether the rezoning is necessary to meet the redevelopment's objectives;

- a) The rezoning of the RZ4 to RZ5 "High Density Residential" accords with the government's objectives of urban intensification close to shopping centres and transport. I am in favour of this rezoning providing the proper attributes of this zoning are not circumvented by the Precinct Code.
- b) I live in [REDACTED] Argyle Square and am particularly worried by the heights planned in Reid Section 7. The original 2010 Master Plan showed the building height immediately next to my apartment was to be a very reasonable 3 stories, which is the same height as my block. The next Master Plan raised the height to 9 storeys. The latest Master Plan reduces it back to 6 storeys and introduces a setback alongside Kogarah Lane. Kogarah Lane is not a proper road and there is no setback on the Argyle Square side of the road. The ACT Code for Multi-Unit Housing Development requires a stepping down from a maximum of 6 storeys to 3 storeys next to an existing RZ4 development. This requirement needs to be observed, and not removed with a Precinct Code.
- c) The DV308 proposal uses an over-riding Precinct Code to bypass most of the sensible provisions and protections of the Code for Multi-Unit Housing and RZ5 Zoning by allowing heights of 6 and 5 storeys adjacent to existing RZ4 (3 and single storey) low and medium-density developments. This has not happened elsewhere in Braddon, Reid or Turner. Turner has excellent examples of recent developments built in accordance with the Codes.
- d) I believe the DV308 Precinct Code should be scrapped and the development proceed in accordance with the full protections provided by the Code for Multi-Unit Housing Development and RZ5 High Density zoning.

2. implications for parking and traffic in the area;

- a) When Argyle Square was built in the 1980's only one parking space was provided for each of the (mostly two-bedroom) units. Soon after completion it was necessary to reserve kerb-side resident-only parking on all of the surrounding streets. In addition, residents now use the spaces in front of their garages for extra cars.
- b) There is no evidence that car ownership has decreased in the last 25 years in Argyle Square.
- c) I agree that the proximity to Civic results in more people walking, bicycling or using public transport to get work, however the area is a prime rental location

and most units have adults living in their second bedroom who also own a car. This was confirmed by Housing at the briefing on 16/2/12 when we were told that they expected very few children to live in the redevelopment.

- d) If the DV308 redevelopment is built with the proposed shortfall of about 300 spaces below the government's own Parking Code, the DV308 visitor spaces will be used by residents and the pressure on street parking will be worse than we now experience.
- e) I therefore believe car-parking should be provided at a rate of one space per bedroom.
- f) I am particularly worried by the increased usage proposed for Kogarah Lane.
- g) In the latest proposal, all entry and exit to one of the huge Reid Section 7 underground car-parks will still be from Kogarah Lane.
- h) Kogarah Lane is not a full-width street and is often blocked by service vehicles and garbage bins collection on Thursdays and Fridays. (see photos).
- i) The traffic consultants estimate about 100 cars per hour will leave the Reid Section 7 car-park each morning and return in the evening.
- j) Kogarah Lane already provides entry and egress to two medium and three small car-parks in the Argyle Square Apartments complex.
- k) I suggested that Kogarah Lane needs to be either widened to a full width street, made one-way or all the entries the Reid Section 7 car-parks be from Coorong, Ainslie or Boolee Streets. This suggestion was dismissed by Housing because there are services along Kogarah Lane that might have to be relocated.

3. the height, scale and associated impacts of the proposed redevelopment;

- a) The Reid Section 7 development will be between Glebe Park, the 5-storey Canberra Centre and the 3 to 4 storey Argyle Square. The huge bulk of this new development will destroy much of the amenity of the area where I now live. This new development will create wind-canyon effects similar to those now occurring around the Woden post-office plaza, because the 10 and 15 storey blocks will be so much higher than the surrounding buildings.
- b) According to the consultant's report there will also be considerable solar shadowing on winter afternoons which is very undesirable in a development which is supposed to be environmentally sensitive. The plans seem to be capturing the afternoon sun for the winter benefit of the new apartments but at the same time removing sun from existing apartments in Argyle Square.
- c) Morning solar shading has not been mentioned however considerable shading of Glebe Park playground and the Lutheran Church in Boolee Street will occur.
- d) It should be noted however that the suburb of Braddon already has the second highest population density in Canberra (ABS March 2010). The DV308 planned 500 people per hectare (without any additional community facilities) is unsatisfactory.
 - i) The current ABC Flats site already has a population density of 110 people per hectare. (Housing's 2011 ABC Flats Planning Report)
 - ii) A density of 500 people/hectare is being planned in DV308. (Planning Report and confirmed by Housing's latest apartment yield figures)

- iii) Canberra has an overall density of 4.29 people/hectare. (Aust Bureau of Stats pop. 31/3/2011 & ACTPLA's stated area)
- iv) New York City's urban density is 20.1 people/hectare (2010 US Census)
- v) Surfers Paradise has 33.5 people/hectare. (2006 Census)
- vi) Reid is already 17.7 people/hectare, Braddon is 29.5 people/hectare. (ABS March 2010)
- vii) A new population density of 200-250 people/hectare should provide ample urban intensification without completely destroying the amenity of the surrounding areas.

4. the impact on amenity and character of the surrounding area;

- a) The points made above in para 3 will all affect the character and amenity of the area. In addition the Stalinist wall of apartment blocks along Cooyong Street will be ugly.
- b) According to my own count, there are about 195 trees in the affected area, mostly large mature trees providing beautiful shaded walkways and recreation spaces in summer. Only 7 will be protected. (see photos).
- c) All of the mature street trees along Cooyong Street will be removed so that Cooyong Street can be widened for a bike lane.
- d) The artist's redevelopment drawings in the planning report show trees that are estimated to be about 20 years old. We are therefore facing a moonscape for at least ten years.
- e) Why can't the redevelopment be accommodated between the existing trees?
- f) The Planning Report's intention is to provide solar passive designs with cross-ventilation for cooling in summer. However, their own noise consultant has said the traffic noise from Cooyong Street will be unacceptable and special noise-proof window treatments will be necessary. For these treatments to work the windows must be kept closed and mechanical ventilation used. This will be expensive and not environmentally responsible.
- g) The Department of Housing clearly knows about this noise problem and some years ago installed expensive air-conditioning for all the flats along Cooyong Street.
- h) Unless the set-back along Cooyong Street is increased to allow a wide vegetation border, the redevelopment will not be an example of responsible environmental design.

5. heritage considerations;

- a) The heritage residences in Braddon resulted in additional care being taken to step down the new development towards Currong Street. The same attention should be given to stepping down in Reid towards Kogarah Lane.
- b) The heritage listed Catholic Church will be demolished which does not address the needs of the church's congregation. A proposal to give the church a room in the redevelopment (with no parking) is apparently unacceptable..

6. city/residential boundaries.

- a) Rezoning part of the redevelopment to CZ5 effectively extends the City Centre across the 6-lane arterial Coorong Street into the residential parts of Reid and Braddon, which is unnecessary and undesirable. There is no overall plan describing this expected expansion of the City Centre. The recent City Plan exhibition did not consider this expansion direction.
- b) This development seems at odds with the recent announcements about moving towards City Hill and Lake Burley Griffin, a direction has the advantage of not affecting exiting medium and low density historic residential housing areas.
- c) The recently announced plans for a High Speed Train station in Ainslie Avenue shows much of the Allarah and Currong flats site used for the station and associated car-parking. This together with the Catholic Church lessee problem make DV308 look unviable.

I would like the Committee to:

- a) Do away with the DV308 Precinct Code provisions that water down the protections of RZ5 Zoning and the Multi-Unit Housing Development Code.
- b) Set the reserve price for the site/s high enough to allow the Government to rehouse all of the displaced social housing tenants without using taxpayers money.
- c) Introduce mandatory building defect insurance for all residential buildings, not just those 3 storeys or less.
- d) Insist on the stated ACT government policy of "pepper and salting" for the remaining social 10% of total apartments.
- e) Reduce the population intensification to only double the existing density.
- f) Widen Kogarah Lane.

OR

- g) abandon the whole scheme and probably save the taxpayers at least \$40million.

I would like to present my case in person before the committee.

Sincerely,



Chris Emery



19 April 2013