

Dear Madam,

I wish to make a submission to your committee on the Draft Variation to the Territory Plan No. 306.

As you can see from the recommended final variation from ACTPLA, there have been many submissions made by organisations and members of the public concerned with DV301, DV303 and DV306 which superseded these. I contributed submissions to both DV303 and DV306, and a summary of submissions and ACTPLA's own preferences or recommendations are now before the Committee.

I do not wish to reiterate these details but I would like to present my overview of this Draft Variation and try to provide some context for your deliberations. These are as follows:

Earlier Planning of Canberra

Canberra is one of those rare planned cities and the established layout stems from a highly successful Griffin/NCDC model that has been copied in many cities around Australia. Canberrans like living in a planned city and expect that any proposals to radically alter what is in place should be carefully considered with plenty of consultation using highly expert planners and effective problem solving.

There is unfortunately none of this happening and therefore as you well know there is widespread discontent with planning decisions made and current practices. ACTPLA lacks appropriate expertise and is now seen merely as an arm of developers and government chasing revenue. "Planning" is now ad hoc and citizens are upset at what is happening in their own suburbs and city with the loss of treasured vistas and amenity which amount to a reversal of the character and lifestyle associated with Canberra. We are heading down to the planning levels experienced in other larger Australian cities and towns.

The ACT Government claims we have to do all of this to contain spreading and to fit more people into the existing area. However, a common view is that the way this is being done is the wrong way. There is no substitute for resuming having a master plan which is either new or modified in order to keep this place well-planned and a great place to live.

Part of the problem is that after the carefully considered NCDC model of a sustainable city ended, we now have a toy bucket full of subsequent plans which are, oddly, mostly extant.

The earlier NCDC model of modest homes in green environments and schools, shops, sporting grounds, and community facilities all within walking or cycling distance of homes has now given way to high-energy consuming homes, 2 cars per household used to transport children to distant schools and to shop at major centres, social isolation and a breakdown of a sense of belonging to a local community.

The reaction to these changes has been to keep coming up with one plan on top of another (e.g. we have a National Capital Plan, Garden City Plan, Neighbourhood Plans, Precinct Plans and ACT Planning Strategy just to name some) with most of these pushed aside in favour of the Territory Plan.

The Territory Plan is held in low regard as it confuses residents, architects, builders and developers alike and there is a constant stream of complaints about this Plan and its administration. This DV306 comes across as just something else to add to the planning patchwork quilt.

Administration of Planning

The levels of frustration for residents are further exacerbated by the administration of the Territory Plan. It does not matter how well worded or crafted the Plan, developers and builders just do what they like. My personal experience with a Marsden Street multi-unit project was that ACTPLA rubber stamped a set of poorly drafted plans that did not comply with its regulations and left it to the affected residents to go to ACAT at great expense in time and money. We won this appeal but our experience shows that ACTPLA leaves it to objectors to do its job or it hopes they will not appeal. We also have several McMansions now in Dickson, all well over the maximum allowed “mandatory” plot ratio of 50%. Some of these are second storey additions to single storey dwellings that were already around the 50% plot ratio, others are knockdown rebuilds where the building certifiers have obviously looked the other way (or worse).

The shoddy building standards of multi-unit complexes is becoming a big issue and this is currently under investigation by the ACT Auditor-General.

The Way Forward

Accumulating plans and patching up some of them is not the way of planning a city which wants to be ahead of others in Australia and in other parts of the world.

Existing plans need to be made compatible, rationalised or discarded. A new master plan of substance, with direct connections to Griffin’s vision and NCDCs established urban pattern, is the present Canberrans should be giving ourselves in 2013.

To do this it is necessary to have clever planners and top planning administrators. Mechanisms to engage the community in this endeavour are also needed. Appropriate remuneration would be required for this type of expertise and they would need to have the right type and number of staff. There is no excuse not to have such a well resourced planning authority as the ACT Government depends on real estate/property/building for about 60% of its revenue.

Omissions from DV306

There is a lot of demolition happening all over Canberra by developers or house owners who want to rebuild for profit or aspirational motives. This replacement of a sound building is at a high cost in terms of carbon. Compulsory recycling of demolition materials should be mandatory in this day and age. Perhaps this is more a matter for TAMS but it falls under the same Directorate. I refer you to Appendix B, Part C and Appendix D, Part D 12.1 of DV306. I would also ask the Committee to dwell a while on this omission, as it looks increasingly unlikely Canberra will meet its greenhouse targets.

Some Comments on DV306

Some of the assumptions made in DV306 are strange:

- Studies have shown older people normally want to age in place, so the assumption that DV306 is trying to cater for their future needs is specious. Anyway, few older

people wishing to downsize could cope with “densified” two storey units with stairs.

- Recent surveys indicate the market for units for single people is already saturated, so DV306 concerns here are rather out-of-date.
- Densifying as proposed by current planning does not solve problems of having enough green spaces, energy saving or traffic problems. Clever solutions are needed to tackle these, so let us have integrated, holistic planning in place of short-term pseudo planning which is a disguise for revenue raising.
- Short-term thinking and a lack of historical knowledge is shown. In the 1930’s and 40’s people used their backyards to grow food due to poverty, in the 70’s and 80’s people chose to grow food in their yards (some even demolished some part of their buildings to gain more space). Now we are about to be forced by peak oil and sustainable energy costs to pay more for everything and backyard food supplies will soon be back with us. Units and McMansions are useless for this and eventually some may have to be dismantled fully or in part to increase land available for urban farming.
- Densification removes flexibility of land use, be it for food, hobbies, storage or recreation. The answer is do not dismantle successful suburbs, just move denser living to new areas, but put a lot of thought into the planning of these estates. Knocking down areas in older suburbs to build units solves nothing. Such houses are needed by families, students and those needing single storey dwellings, so why try to move these people to outer areas having single dwellings. Leave these viable areas intact and build well planned compact dwellings in the new greenfield areas. Doing this gives exactly the same number of people living within the city area limits without adversely affecting the established inner suburbs.

Assessment of DV306 Being Recommended by ACTPLA

This DV306 is an improvement on DV301/303. It gives more recognition to the importance of neighbourhoods and their characteristics, especially in RZ2 zones and attempts to deal with the zeal of developers for profit and their enthusiasm for overdevelopment. The language used in this Draft Variation is clearer and more attention has been paid to solar access, privacy and residents’ vistas.

The Committee should note that most of the submissions to ACTPLA on DV306 either wanted further improvements to the policies and regulations or were by and large satisfied with the proposals as they stand. Only relatively few wanted less regulation, denser development or the status quo. Of these, most seem to be vested interest organisations or individuals representing architects, builders, developers and real estate agents.

I would expect these latter groups are now actively lobbying the ACT Government and I would hope that their views are kept in perspective by both the Committee and the ACT Government.

Yours sincerely,

John Holland

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