



REID RESIDENTS' ASSOCIATION INC



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REID ACT 2612
20 April 2013

Standing Committee on Planning, Environment
and Territory and Municipal Services
ACT Legislative Assembly
GPO Box 1020
Canberra, ACT 2601

cc

- All Assembly Members
- ACT Heritage Council

DRAFT VARIATION TO THE TERRITORY PLAN NO. 308: COOYONG STREET URBAN RENEWAL AREA (BRADDON SECTIONS 52 AND 57 AND REID SECTION 7 - CHANGE OF ZONING).

Dear Sir/Madam

The Reid Residents Association (RRA) is an incorporated not for profit residents' association formed in 1944 with the following objectives:

1. Foster an appreciation of the present Reid environment and encourage its preservation, taking into account the interest and welfare of the community,
2. Support and implement agreed action on Reid community projects and interests.

The Association has approximately 100 members. RRA is actively involved in highlighting and maintaining the Heritage aspects of the suburb of Reid and its "Garden City" planning principles.

The residents of Reid, as well as Braddon, and Campbell, accept that change and re-development are facts of life and are not opposed to redevelopment of the site. There are however major issues relating to the size, height, scale and mixed land use of the present proposal which we consider are completely unsuitable for a combined site which adjoins existing residential precincts that have heritage significance. Our objection is based on the fact the proposed variation will provide poor community and planning outcomes.

President
John Little

Secretary
Graham Carter OAM

Treasurer & Public Officer
Derk Swieringa

Committee Members

Marianne Albury-Colless, Sue Byrne, Sue Lynskey, Joanne Nicholls, Amanda Reynolds, John Tucker

This is a major development initiative for an important part of the city. Like the City to the Lake project it should be seen as a transformational project that is developed within the City Plan, and is integral to realising the City's potential as we embark on our second century.

It should be about creating an international urban planning exemplar for residential development on the fringe of the CBD. It should provide a model of best practice, innovation and creativity to seamlessly unify the centre of the City with the surrounding suburban areas of the world's leading Garden City. It should be designed as a place where everyone would want to live and be happy.

Instead, it is being treated as run of the mill, bog standard, high rise construction project to provide a quick fix cash cow to generate as much money as possible for Housing ACT. Canberra and the nation deserves much better. Each part of the Government is fixated within its own silo and there is no connection between disparate initiatives and projects that should be cohesive and integrated ie

1. Cooyong Street Urban Renewal Area (ABC Flats);
2. City to the Lake project (currently open to consultation);
3. The City Plan (currently open to consultation);
4. Development of Constitution Avenue; and now
5. Braddon Oval Development (Section 30; Blocks 5&6) and
6. High Speed Rail station now proposed for Ainslie Avenue in the midst of the ABC flats.

In examining this proposal we suggest the Planning Committee should take account of these other projects and consider the Government's vision for the City to the Lake project, which is equally relevant to this area of the city ie.

VISION

"In its first 100 years Canberra has grown to be a beautiful city, renowned as one of the world's great planned capitals. From enlightened foundations of the Griffin's vision, the City has evolved to develop a unique identity.

The citizens of Canberra have been at the centre of this evolution which has established the city's array of parks, gardens and tree lined streets underpinning its garden city character. As the City grows to a population of 500,000 and beyond, The City Plan examines how we can make it an even better place. How will the City e

volve as it embarks on the next 100 years? This is a critical question that The City Plan seeks to address with a far sighted vision into the 21st century.

Linking the City is a key initiative of The City Plan and a powerful catalyst for transforming central Canberra.

There remains work to do to realise the great potential of the City centre, Canberra's urban heart and key element of the National Capital.

Linking Canberra City is about unlocking the potential of our City centre through providing memorable and robust public domain and facilities so that it can evolve to become a place which is more attractive to residents and visitors, where people will happily stay longer. It will be more active, safer and accessible with diverse activities during the day and at night.

The National Capital Authority's Griffin Legacy provides the basis for unlocking the potential of the City by realising unbuilt parts of the Griffin Plan."

Attached for the Committee's consideration is a copy of RRA's previous submission on this proposal and our more recent submission in relation to the development at Braddon Oval. Notwithstanding the recent changes contained in the Report on Consultation our views remain largely unchanged.

We are concerned the proposed planning variation will change Reid and Braddon through a combination of stealth and bracket creep in terms of building scale, height and commercial and retail extension into residential areas from this:



Figure 1 Existing Site
To this



Figure 2 Proposed View

1. **WHETHER THE REZONING IS NECESSARY**

The plan is to replace the existing units with new multi-storey units. We believe that rezoning is not necessary and establishes an unwarranted planning precedent. The proposed new precinct would straddle two suburbs and is being created for the convenience of the owner/developer.

In our view the Government is placing itself in an invidious position. On the one hand the Government is adopting the role of owner and developer and is seeking to change the zoning to maximize financial return. As a consequence, the Government (ACTPLA) is in a compromised situation as it is under political pressure to recommend and approve the rezoning and thus increase Government revenue from the development fees and the land sale.

2. IMPLICATIONS FOR PARKING AND TRAFFIC

The site (5.1ha) currently houses approximately 550 people in 440 one and two bedroom apartments. If approved, the Development Variation would result in 1,160 apartments with a population of about 2,500 people with 54% in either studio or single bedroom dwellings. There will also be approximately 7,500m² of non-residential commercial, retail and community space at ground and first floor levels facing Cooyong Street, together with parking for approximately 1,700 cars. The provision for parking on site would be less than the normal requirement in the ACT for residential parking. In its planning the proposal includes parking areas as far away as the CIT and Olympic pool in Constitution Avenue as part of the available supply and suggests that visitors will use the pay parking in the Canberra Centre carparks. Are they kidding?

There will be an inevitable overflow of parking into surrounding areas as well increased traffic volumes. This is another area where the plan does not have respect for the existing residents in the area. The aggregated parking, traffic, noise and other impacts of the developments in Braddon, Civic, Reid and Campbell need to be considered by the Committee. At present the individual agencies are ignoring future problems by hiding in their own silos and pointing us towards other agencies.

3. HEIGHT, SCALE AND ASSOCIATED IMPACTS

The public consultation for the project has been poorly managed. Each time feedback from the community has been the buildings are too high and too big. However each time Housing ACT has returned with proposals that are even larger.

We do not agree a 15 storey high towers should be permitted. The integrity of the vista along Ainslie Avenue was destroyed when the Canberra Centre flooded over it and justification of 15 storey towers on the basis of landmarks is meaningless. The site should be developed on the basis of replacing the tallest buildings like for like ie 8 storeys which is the level of the current Currong Flats –with step downs to the adjacent residential areas.

We believe this would provide a consistent approach to design on the eastern side of the city and greater harmony with the existing houses and flats in Braddon as well as Reid. We would point out that for other contiguous multi-unit development projects (Campbell Section 5 and the Jamieson Apartments in Constitution Avenue, Reid), both the ACT Government and the National Capital Authority have determined that building heights in the Sections within Reid and Campbell should not exceed 25m and must transition down in scale to a maximum of 3 storeys (generally 12 metres above natural ground level) to be sympathetic the scale of adjoining suburbs of Reid and Campbell.



Figure 3 Campbell Section 5 – Option 2 December 2011

For this development over the last 18 months the Government, through the LDA and NCA, has undertaken extensive community consultation and engagement with residents in Reid as well as Campbell about the scale and height of the multi storey development. In December 2011, three options were presented by the LDA and each design includes a landscaped buffer zone along the sides of the site that adjoin the existing residences together with a gradual rise in building heights. The rise will be:

- 13m (3-4 storeys)
- 19m (5 storeys) and
- 25m (8 storeys).

We have been told by LDA that the height element of the designs gives better definition of streets, and potentially better solar access and the park-edge development complements high-density design.

We also note that the 25m height limitation is applied to the Jamieson Apartment project on Constitution Avenue. That building will have 8 storeys plus a five level basement.



Figure 4 Jamieson Apartments Constitution Avenue Reid

This consistent height limit extends from Campbell along Constitution Avenue and then intersects with the same heights in the City Centre. This uniformity of building heights provides the visual harmony on the eastern side of the lake that is a tenet of the NCP. We strongly believe these same height limits and associated design considerations should be applied to Variation 308.

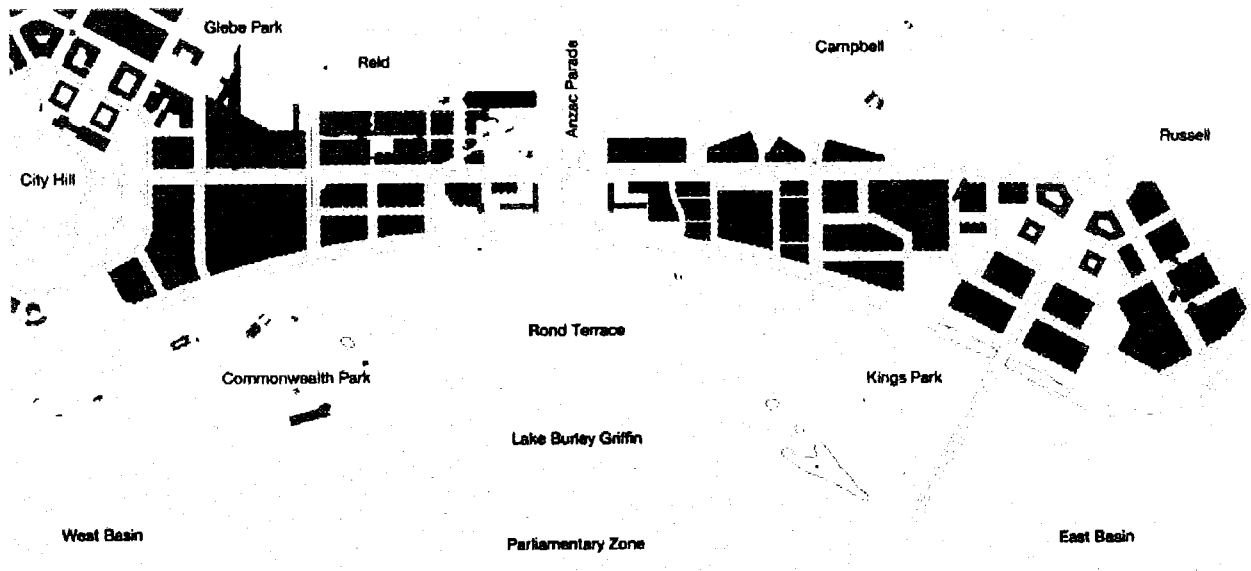


Figure 5 Constitution Avenue – Building Height and Form

4. IMPACT ON AMENITY AND CHARACTER OF THE SURROUNDING AREA

The subject area is fundamentally different to the western side of Civic where there was not a pre-existing residential area with a Neighbourhood Plan or significant heritage-listed residential precincts. On that side the multi-storey developments have been provided for an largely transitory population that has little or no interest in medium or long term impacts.

As is stands we believe the proposed development is not befitting of Canberra. Rather than ordinary cluster of high rise buildings, we believe the Committee has the duty to require a development that befits Canberra’s status as an international exemplar for leading urban planning and design. Instead of trying to squeeze the maximum number of non-descript boxes to maximize the yield the design should embrace and celebrate the Garden City principles.

A sense of community identity and cohesion with the surrounding residential areas should be achieved by applying good design techniques to the development. A more creative and innovative arrangement of buildings, open space reserves and ancillary amenities and services should afford stylistic consistency and help to establish a cohesive visual environment. Perhaps it might be useful for the Committee as the primary custodian of Canberra planning and architectural design to consider some form of design competition to encourage design innovation and creativity?

The design of Canberra’s residential suburbs is predicated on Garden City Planning Principles that are being totally ignored in the development.

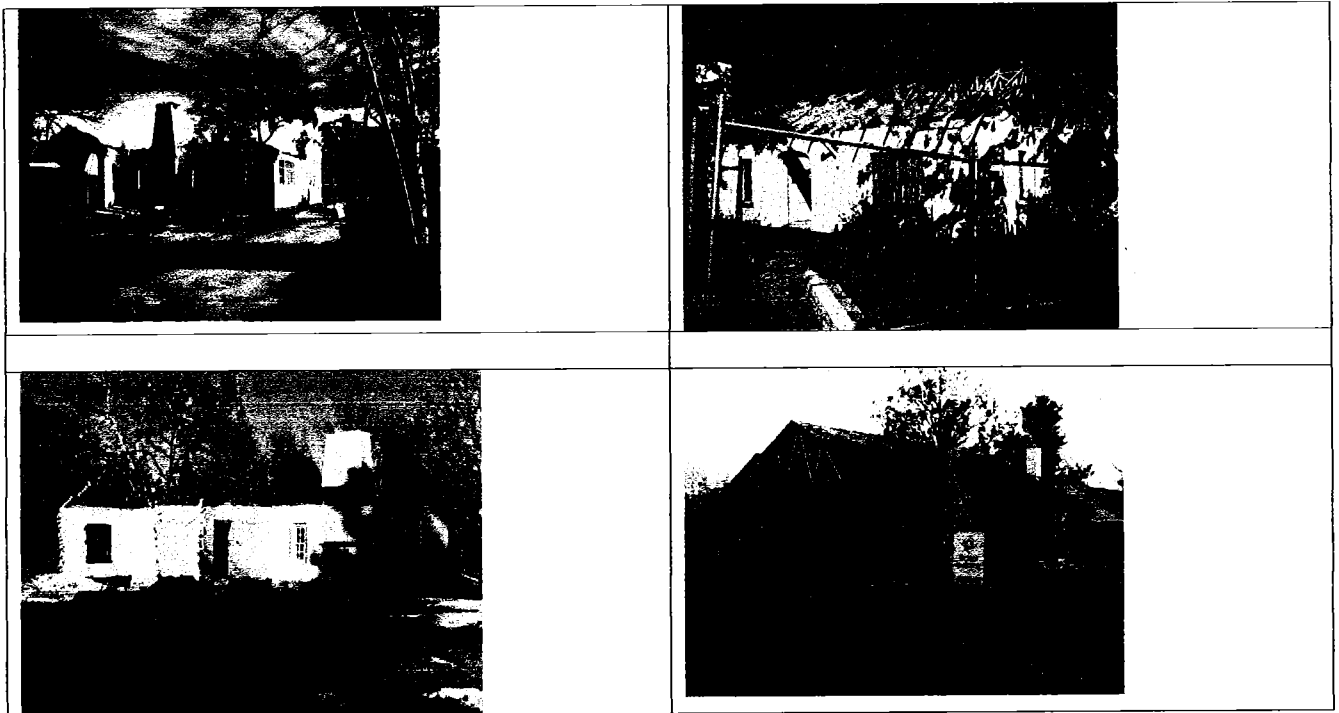
5. **HERITAGE CONSIDERATIONS**

A city's heritage is an important community asset that should be respected and preserved for future generations. The National Trust has identified that Canberra's inner north residential heritage precincts are at risk through incremental Territorial and National planning changes.

The project only considers heritage from a perspective internal to the site itself. There is no consideration to the external impacts the development will have on the surrounding heritage precincts.

The design of the buildings should provide architectural harmony with the design of the surrounding precincts. This was a requirement when the Monterey apartments were built. Also when the Argyle Square units were built there was consideration of the adjoining areas heritage significance and this was addressed in the physical style of the construction and the orientation of the units to minimize visual impacts. No such consideration is being given in this proposal. We are also concerned in this latest version it now proposed to construct a 10 storey tower at the corner of Cooyong and Boolee Streets where in the previous plan it was proposed to leave an existing 3 storey.

We are also concerned that development will require the removal of a large number of mature trees. The extent to which the Government itself values these areas is demonstrated by the fact that it is allowing virtual demolition of these heritage listed dwellings eg:



Conservation Management Plan

The Committee must take action to ensure a Conservation Management Plan is put in place for Reid, and the other residential heritage precincts, as soon as possible as recommended by the Review of the ACT Heritage nearly two years ago. A draft plan for Reid was prepared in the early 1990's and only needs slight refreshment.

6. CITY/RESIDENTIAL BOUNDARIES

We believe that Cooyong Street should remain the clear boundary between the commercial and residential areas of Braddon and Reid. Civic is already in a state of oversupply for retail and commercial space. Adding to the supply would also exacerbate over supply problems and financial viability for retail traders.

7. OTHER ISSUES

Community Facilities

According to the City to the Lake Project there will be 15,000 to 20,000 new residential apartments in the city area. We are being told that as the City grows we have to plan for key infrastructure, major recreation and cultural facilities to reserve sites and 'future proof' our City.

The existing supply of community facilities in the inner north is currently under threat in part due to the age of the facilities and the limited capacity community groups themselves to invest in renewal and/or replacement. If sites such as this and the nearby St Patrick's Church and Braddon Oval are continually picked off for opportunistic sale on the basis of highest (not best) use then the amenity of both existing and the many more future inner north residents will be seriously depleted.

As a by-product of this submission and to establish a better basis for increased urban density, we request the Committee to initiate a full Needs Assessment of community facilities in the North Canberra suburbs of Lyneham, Downer, Dickson, Hackett, O'Connor, Turner, Braddon, Acton, Reid, Civic, Campbell, Ainslie and Duntroon. We are aware of the Community Facilities Needs Assessment Report - ACT (Southside). On the basis of the report, we believe the Needs Assessment must:

take account of the fact that land available for community facility use is finite, the planning process must be more strategic and the prioritisation of needs undertaken with whole of government approach; and

recognise ACT community values the protection of community facilities afforded by the Community Facility Land Use Policy (CFLUP) and be concerned about potential loss of CFLUP land for other land uses. The reason being that restrictions within the policy provides a higher level of certainty that the land will be used for community facilities than what is provided by other Land Use Policies (LUPs).

The study must also address the importance of a periodic audit/assessment of current facilities, which can assist Government agencies and the community in planning for social infrastructure in the future.

As result of the Needs Assessment, strategies must be put in place to maximise the benefits of existing leased community facility land as well as responding to opportunities when existing leases are surrendered. Similarly, policies are required that will assist the Authority in responding to applications by lessees who are seeking to change the type of facilities or Land Use Policy to some other purpose.

Concomitant Developments

The Committee must consider the relationships and aggregated impacts between this project and other concomitant developments ie

City to the Lake project (currently open to consultation);
The City Plan (currently open to consultation);
Development of Constitution Avenue; and now
Braddon Oval Development (Section 30; Blocks 5&6) and
High Speed Rail station now proposed for Ainslie Avenue in the midst of the ABC flats.

Kograh Lane

This lane very narrow and in addition provides access to existing underground parking for Argyle Square. There will be major traffic problems in the space as well as access problems during construction period. The Committee needs to examine this issue.

Public Consultation is it still meaningful?

From our perspective there is no apparent overall coordination between agencies and no consideration of the aggregated impacts on existing residents. Planning documents, with attendant consultations, such as the Braddon Neighbourhood Plan are being ignored and severely call into question, whether involvement by community organizations such ourselves in suburban planning has any purpose or value.

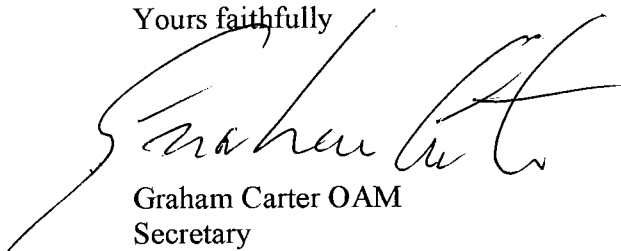
Our Committee members, are lay people. They are all volunteers, mostly without expert knowledge and skills, who undertake these community activities in their spare time. The Red Tape has become too complex and given our experience with this and the other projects, our members have now got the impression that "Public Consultation" is only being undertaken for the purpose of "ticking a box" and community input is conveniently brushed aside.

The whole system has become overwhelmingly biased to developers, who have comparatively vast resources and can employ professional consultants.

It is essential the Planning Committee considers the extent to which the current plethora of plans, strategies, codes, rules etc is rendering it almost impossible for community organizations such as ourselves to participate in "Public Consultation" in a meaningful manner.

Some form of assistance and support needs to be provided to enable community organizations. Including residents associations as well as Community Councils to contribute in an equitable manner.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Graham Carter', written over a horizontal line.

Graham Carter OAM
Secretary