

SUBMISSION BY MEMBERS OF THE DEAKIN RESIDENTS' ASSOCIATION (DRA)
TO THE STANDING COMMITTEE ON PLANNING AND ENVIRONMENT ON
DRAFT VARIATION TO THE TERRITORY PLAN NO. 205 (DV205) – DEAKIN BLOCK
11, SECTION 68 (OASIS LEISURE CENTRE) PROPOSED OFFICE USE; AND
DRAFT VARIATION TO THE TERRITORY PLAN NO. 237 (DV237) – DEAKIN SECTION
12 BLOCKS 9, 13 AND 19, EMBASSY MOTEL REDEVELOPMENT PROPOSED
RESIDENTIAL USE

INTRODUCTION

1. DRA members *welcome the Standing Committee's decision to conduct a public inquiry* on DV205 and DV237. This Submission deals primarily with DV237. It will cover briefly issues related to DV205 and individual residents may make further comment separately.
2. Residents particularly *welcome the opportunity to comment on DV237* and a proposed redevelopment which, if approved, would fundamentally and permanently change Deakin and have far-reaching implications for Canberra's inner south. The issues involved are complex, with significant implications for ACTPLA and NCA planning policies, but the adverse impact of the proposed redevelopment for the character of Deakin is clear and obvious to residents.
3. *If approved, DV237 would change land use to permit the demolition of the Embassy Motel and its replacement by a high-density high-rise residential development of 143 units* of varying sizes, comprising four towers - two lower towers and two at seven storeys – which would rise six storeys above Adelaide Avenue. The site is subject to a Development Control Plan (DCP No 171/02/0009) adopted by the National Capital Authority (NCA) on 9 August 2002. This provides that any buildings on Hopetoun Circuit entry to Deakin from Adelaide Avenue should “create landmarks by virtue of the quality and composition of their design” and should be “predominantly three storeys and a maximum of four storeys in height”. Before the ACT Government can approve five and seven storey redevelopment, the proponent would have to submit a more detailed proposal for the NCA's approval and the NCA would need to agree to change the conditions of the DCP.
4. Any change in planning controls (including land use) on the Embassy Motel site would have *a direct impact on the opposite “Solander” site* (previously occupied by the “Made from Australia” gallery now closed). It would also *potentially affect three other Deakin sites* designated for Entertainment, Accommodation and Leisure Land Use.
5. Residents are grateful that the Standing Committee is holding a public inquiry but are *worried that the role of the Committee may have been undermined* because
 - the Minister has already pre-empted the decision (when addressing the DRA on 25 November 2004, the ACT Minister for Planning indicated he was committed to the redevelopment going ahead as planned)
 - the change of land use is being considered without any public or independent testing of the possibility of continuing the current more desirable land use
 - the proposed redevelopment is contrary to current planning controls and has been declared unviable by the proponent under these restrictions; yet consideration of a key planning control (height) is technically beyond the terms of reference of the Committee, and

- the proposed height and style of the redevelopment and its impact on the character of the major approach to the Parliamentary Zone seems to contravene The Griffin Legacy, but this issue is missing from the Committee's terms of reference.

6. Deakin residents appreciate building height is technically matter for consideration by the NCA. However, as the DCP specifies a maximum height of four storeys, which DV237 exceeds, and as there is apparently no obligation on the NCA to undertake public consultation, ***residents will address building height in this Submission.*** Although not consulted before DCP 171 was approved on 9 August 2002, ***residents nevertheless strongly endorse the height restriction of four storeys*** and do not consider it sensible or appropriate for the Standing Committee to consider a proposal which is contrary to legislated controls that were recently developed and proclaimed for this site.

VIEWS IN THE COMMUNITY

7. There has been ***considerable concern in Deakin and surrounding suburbs about the proposed redevelopment*** on the Embassy Motel site. This is reflected in, among other things, 445 signatories to a community petition protesting a seven storey development. (A copy of this petition is attached at "A") There are some differing views in the community. Some local shopkeepers, for example, are in favour of a major residential development that would bring additional business. A small number of residents may be keen to buy into the development, as a private dwelling or an investment option, and will want to see this redevelopment proceed.

8. However, ***the views in this Submission reflect those of a significant number of Deakin residents who have been consulted***, including the many who signed the petition. There is overwhelming opposition to a seven storey redevelopment on the Embassy Motel site and significant support for tourist accommodation and conference facilities to be retained and re-developed

9. These ***Deakin residents favour progressive improvement of Deakin.*** They are ready to support measured development of the shopping precinct which clearly needs upgrading. They are also ready to accept redevelopment on both the Embassy Motel and Solander sites as long as this is within existing planning controls

TERMS OF REFERENCE: DV237: (i)-(iv)

(i) Continuation or replacement of the Entertainment Accommodation and Leisure Land Use Policy for Section 12 Blocks 9 and 13, Deakin

10. The ***proposed land use change would remove from Deakin a significant local tourist facility.*** It is a four star 150-bed motel in the middle tariff range. The motel has been useful for local residents and others, providing access to a restaurant, visitor accommodation and conference facilities. It has provided facilities for clubs across the inner south and for community events. Local enquiries have established that Rotary Club of East Canberra, Rotary Club of Woden, Quota International, Woden View Club, Soroptimists International, Gideons, Probus and Inner Wheel regularly use the motel facilities. It is also used by members of Federal Parliament in sitting times.

11. The motel was refurbished recently (finalised in 2002) and, although it may require some upgrading, (and residents would be prepared to see rebuilding within existing controls) it is ***regarded***

as a valuable community asset. It has operated well and is regarded locally as a good neighbour. The some 30 staff employed by or associated with the motel would be lost to Deakin if the motel closed.

12. The explanatory statement in DV237 refers to advice by the proponent (who has an option to purchase the site) that the existing motel is “nearing the end of its viable economic life” and refurbishment is “not an economically viable option”. The proponent also produced advice, accepted by ACTPLA, apparently without any comprehensive independent assessment, that “redevelopment of the site for uses permitted under the current Entertainment Accommodation and Leisure land use policy is not likely”.

13. **Residents remain to be convinced that there is no future for the existing motel, or that it could not be refurbished to make it economically viable.** There was no evidence in the DV237, beyond the view of the proponent, that the motel is not economically viable. A letter to ACTPLA dated 25 November 2003 from Capital Planners ACT Pty Ltd on behalf of the developers is unconvincing and contains no financial data sourced from the motel. The letter refers to occupancy rates to indicate the motel is operating at a loss (which we understand may not be the case) and does not offer comparative data for Canberra for the same period. The data produced by the proponent is three years old and based on a period of significant downturn in the tourist industry due to the influence of terrorism and SARs. Recent ABS data (since the recovery of the industry across Canberra) would be a more realistic guide. Data on the motel should also take account of the impact since mid-2004 of publicity about its anticipated demolition which may have reduced bookings.

14. Moreover **there is also a range of possible options for land use under the existing tourist and leisure development zoning**, including upgrading to a larger high standard hotel to take advantage of this prime location for national and international visitors. Part of a motel facility could (for instance) also be adapted, without a change of land use, to handle the Canberra-wide shortage of short-stay interim supported accommodation after hospitalisation. There may also be scope for some of the motel to be converted to self-serviced apartments which again would not require a land use change. The range of options acceptable under current and more desirable land use has not been explored in the rush to change the land use to residential. There is an obligation to fully and openly test the market before any change of land use is considered.

15. It has been general practice in the ACT that if an owner is unable to economically operate under current land use (and the would-be developer is not yet the owner) the owner sells to someone else who can. If the current owners are unable to develop the Embassy Motel site, in the interests of proper planning processes and fair play to other interested parties **expressions of interest should be called to see who else might operate on the site under current conditions.**

16. In removing from Canberra a valuable site for tourist development close to the Parliamentary triangle, **the land use change is also contrary to ACTPLA policy about preserving such valuable sites for future development.** ACTPLA itself has admitted (ACTPLA letter to Capital Planners ACT Pty Ltd dated 10 November 2003) that sites capable of commercial tourist accommodation use are a limited resource and once lost are not readily replaced. Stated objective (g) of the Entertainment, Accommodation and Leisure Land Use Policy is to “protect entertainment, accommodation and leisure uses from competition from higher order commercial uses”. What is proposed by this land use change is precisely what the policy is designed to prevent.

17. Tourism is and will continue to be a major industry for Canberra. The recent debate about the shortage of hotel rooms in Canberra, which along with a shortage of quality conference facilities

prevented Canberra being able to bid for the 2007 APEC meeting, highlights the nature of the problem. The Chief Minister publicly stated that he would be keen for industry to provide four star tourist beds (ABC radio morning program interview 10/2/05) and yet ACTPLA is proposing the loss of 150 four star beds. ***Residents consider a comprehensive assessment, independent of the proponent, should be prepared on future site requirements for Canberra tourism development*** having regard to the potential to host major international events, the proposed Arboretum and other prospective tourist developments in Canberra, and this should address the consequences for the ACT tourist industry of the loss of the Embassy Motel site.

18. Residents are ***very concerned about the apparently ready agreement by ACTPLA to a land use change at the behest of a single developer*** (in this case one with an option on the site), and the lack of certainty this provides for other sites in Deakin and elsewhere. It cuts across the strategic setting aside of sites for defined purposes. Other sites in Deakin would be at risk of similar land use change with the precedent set on this site. Such sites would include, but not be limited to those covered by the same planning controls: the Solander site, the Bridge Club, the Deakin Sports and Social Club, Deakin Health Spa; as well as the service station (Commercial Development Use) and the corridor along Adelaide Avenue currently allocated for Embassy development.

Submission 1: that ACTPLA be directed to seek expressions of interest in the further operation or redevelopment of the Embassy Motel site under existing land use before any consideration is given to a change of use.

(ii) **The suitability of the site for medium and high-density residential development under Residential Land Use Policy with the proposed B15 Residential Area Specific Policy overlay, or with additional controls in that overlay;**

19. The proposed redevelopment would be the ***first high-density high-rise residential building in Deakin*** and the first seven storey development between the lake at Yarralumla and Woden.

20. In DV237, ACTPLA's ***reporting of residents' views was misleading and implied resident acceptance of such a large development***. In fact, in consultations over the Deakin Neighbourhood Plan 2002, ***Deakin residents overwhelmingly opposed high-density high-rise development***. The reference in the Neighbourhood Plan (page 3) is explicit that "an overwhelming majority of people indicated that action needed to be taken to restrict development, limit heights of building, restrict dual occupancy and limit the number of multi-unit developments".

21. The Neighbourhood Plan, also emphasised that Deakin is a "unique suburb" and its low-rise residential garden character is an essential part of what makes Canberra a garden city. ***A high-density high-rise development on this site and prospectively the Solander site would fundamentally change the character of Deakin*** and produce pressure for similar development which would completely transform Deakin from a low-density/garden suburb to one with extensive medium/high-density infill.

22. At the DRA meeting on 25 November 2004, the Minister for Planning argued that, as Embassy Motel and Solander sites were not in the heart of Deakin, they would not change the suburb. Residents disagree. Deakin residents are concerned that proposed high-density high-rise redevelopment on the Embassy Motel site would be a precedent for further such development in Deakin. Consistent with the NCA policy on landmarks and gateways corresponding development on the Solander site would be inevitable. ***High-density high-rise residential development on both sites***

would produce irresistible pressure from developers for further such development into Deakin and in the inner south. There are inexorable examples in cities all over the world of how this process works. Residents consider this would not be a one-off development and assurances by a Minister, who will eventually move on, of no "knock-on effect" carry far less weight than the provisions of the Territory Plan.

23. Residents are also concerned that ***the Minister's agreement in principle to the development has been taken outside the government's own planning processes***. The Canberra Spatial Plan published in March 2004 said that "higher density residential developments will be targeted to specific areas" and "rather than being dispersed throughout the suburbs, intensification will occur" in a number of identified areas being Civic, town centers, Barton, Northbourne and Constitution Avenues, Kingston and west Fyshwick. Residents agree with this existing areas approach. There was no mention in this target list of Deakin. The unilateral decision of the Minister for Planning to change the target suburbs to include Deakin after the publication of the Plan (in a meeting with residents he indicated the post-Plan inclusion of Deakin was "in the spirit of the Plan") surprised Deakin residents and makes a mockery of the published list of targeted suburbs.

24. Residents also consider there is an ***inconsistency between the proposed land use change on this site and government pronouncements about co-location of clubs and residential areas***. The government has argued elsewhere (in relation to the Hungarian Club in Narrabundah) for clubs to be removed from residential areas on noise grounds. DV237 proposes a land use change to allow a very large new residential redevelopment beside an existing and active sports and social club. The risk for the club is that residents of the new development would protest club noise, leading to the club having to expend money on noise reduction or in the worst case, closure of the club.

25. Although no development plan has yet been produced for the Solander site, given the prospect of mirror development on this site, residents with students at Canberra Girls Grammar School are concerned about a possible high-density high-rise building adjoining CGGS's early learning centre. Apart from ***aesthetic and shadowing issues for the centre and school playgrounds*** and likely resident complaints about school noise, there would ***potentially be security issues*** for a girls' school of any development on the Solander site with overlooking windows.

Submission 2: that the Committee reinforces the intent of the Territory Plan and maintains the Embassy Motel site for entertainment, accommodation and leisure landuse.

Submission 3: that the Committee reinforces the intent of the Spatial Plan which provides that higher density residential developments will not be dispersed throughout the suburbs and targeted only to those areas specified in the Spatial Plan.

(iii) Traffic and parking, including public transport provision

26. Residents and others who access Deakin are ***worried about potential traffic problems*** associated with a building of the size proposed. The motel does not cause traffic problems for residents as many users come by bus or taxi. A building of 143 units (and prospectively one on the Solander site) with owner and visitor cars would cause problems for residents and CGGS school.

27. There are already traffic flow problems for residents and school users with a heavy traffic at the Adelaide Avenue intersection on weekday mornings, mid-afternoons and on days of major school

or soccer club activity. Hopetoun Circuit is a major artery and regularly used as a short cut by non-residents. Traffic in and out of this proposed redevelopment would cause even worse traffic jams for Deakin residents and others accessing Adelaide Avenue from Deakin and Yarralumla in particular on weekday mornings, and for school users. We note that ***the major traffic survey used by the developer to justify the change is almost five years old*** (it is dated 29/7/2000), before the school was increased in size by the early learning centre. It takes no account of other foreseeable developments in Deakin or the impact of dual occupancies and other developments that can be expected in the new DV200 zone around Hopetoun Circuit.

28. Parking is now a significant problem at the Deakin shops during the working week and Saturday morning. The Deakin Neighbourhood Plan reported that 2/3 of residents' surveyed saw parking at the shops as a major problem. Anticipated dual occupancies and other developments in the DV200 zone around the shopping precinct would significantly increase parking problems at the shops and in the streets close by. The ***proposed redevelopment would have a significant impact if insufficient resident and visitor parking were provided*** (at least 250 resident parking spaces would be required for residents). The developer's Planning Survey indicates parking would be provided for "a proportion of the visitors" and 40 parking spaces were available in Duff Place. However these spaces are now taken with overflow parking for the shopping centre. Overflow parking for visitors and residents would exacerbate current problems at the Deakin shops, create a shortage of parking in adjoining streets, have a serious impact on school users (including the capacity for parents to attend school functions during a school day) and on daytime activity at the Deakin oval.

29. On public transport, residents ***dispute as unrealistic the government's expectation that people who live in higher density apartments along public transport routes will use public transport***. This is just as unrealistic as providing minimal car parking spaces in high-rise developments. Each apartment would require adequate car spaces and residents could be expected to use their cars in the same way as other Deakin residents. The inadequacy of public transport in servicing areas of Canberra would have the same impact on these residents as on current residents.

Submission 4: that ACTPLA commission an integrated traffic and parking study, to be funded (but not carried out) by the developer, to ascertain the impact of traffic flows from redevelopment of the Embassy Motel and Solander sites, the DV200 zone and other foreseeable developments in Deakin

(iv) Infrastructure provision.

30. Residents are ***concerned about the infrastructure impact of buildings on the Embassy Motel and prospectively the Solander sites***. ACTEW has advised the developer (Planning Study October 2003) that the existing sewers are at capacity and would need to be upgraded for the redevelopment. Also the water tie serving the block would need to be upgraded. An assessment of the sewerage and water supply upgrades was to have been undertaken by ACTEWAGL. The Planning Study did not provide a detailed assessment of the implications for storm water, electricity, gas and telecommunications which are yet to be assessed. There would need to be additional waste disposals services for the building.

31. Residents are concerned that there is no clear costing for the upgrade to infrastructure to service the redevelopment and any corresponding development on the Solander site. Residents are concerned that there would be significant local community cost for such a development. Many

residents are older people who have lived in Deakin for many years, want to stay in their homes and are on limited fixed incomes. ***They are concerned that they would pay through rates for extra utilities required and excessive rates arising from land values associated with such a major development.*** Can residents assume that the developer would pay these costs through sufficient betterment charges?

Submission 5: that ACTPLA advise the full cost of additional infrastructure and government services associated with this proposed redevelopment and other possible developments in surrounding areas of Deakin and advise how these would be recouped.

ADDITIONAL ISSUES OF CONCERN TO DEAKIN RESIDENTS ON DV237: (v)-(viii)

(v) Building height

32. ***There is virtually unanimous opposition by residents to a seven storey redevelopment*** on the site. As the DCP covering height issues does not include provision for public consultation, the Committee process is an opportunity for Deakin residents to express a view on height.

33. Residents see seven storeys as ***completely inappropriate in a suburban residential area***. This was the very strong view of the over 400 people, primarily residents of Deakin and surrounding suburbs, who signed the community petition. They consider it would dominate the landscape and be an eye sore for residents over a wide area. They fear that it ***would trigger similar high-rise through the centre of Deakin***, including at a refurbished shopping centre, Bridge Club, service station site, along Adelaide Avenue. They are worried that the developer with approval for two storey development to the immediate west of the Embassy Motel could, if seven storeys were approved on the Embassy motel site, apply for a higher development on the adjoining site. There is also a prospective impact on anticipated redevelopment at the undeveloped Deakin Inn site.

34. Residents ***strongly support existing planning policies in the current Territory Plan and NCA's DCP 171 for predominantly three and a maximum of four storeys***. The proposed development of seven storeys is well beyond this limit.

35. Residents understand that ***there may also be security issues for CGGS, for the Embassy of Saudi Arabia (which has lodged a formal objection) and the prospective Sri Lankan High Commission*** in seven storeys on the Embassy Motel site and, prospectively, the Solander site. There may also be a security issue for the Prime Minister's residence and Parliament House from the line of sight from such developments and for securing convoys on Adelaide Avenue which is the processional route from the Governor General's residence to Parliament House and the Lodge.

Submission 6: that any redevelopment on the Embassy Motel and Solander sites remain within existing planning controls for predominantly three/maximum of four storeys as contained in DCP No 171/02/0009.

(vi) Public consultation and process issues

36. We would preface criticism of ACTPLA by recognising that since the publication of the Recommended Final Variation, ACTPLA has corresponded frankly with residents, residents have

had ready access to ACTPLA to discuss issues and ACTPLA's staff has been helpful. However, residents consider the Committee should know of flaws in ACTPLA's public consultation process.

37. In considering the development ***ACTPLA (and the NCA) ignored explicit views about such developments in Deakin*** expressed in public consultation processes in 2002. Four months before the Neighbourhood Plan was published, ACTPLA discussed the redevelopment with the developer but did not go back to the community about this before the Plan was published. Despite its significance the redevelopment proposal did not even rate a footnote in the published Plan.

38. Residents are concerned that ***the public consultation process in May/June 2004, did not inform residents of material information***. ACTPLA's Public Notice and standard consultation letter to residents failed to say that the planned redevelopment would be seven storeys. Most residents did not find out until after public consultation process was over and when they did, through resident action, the vast majority were shocked and angry. Many saw it as development by stealth.

39. Residents consider ***ACTPLA's consultation process was also very narrow***. Of 350 consultation letters produced by ACTPLA, only 16 letters were sent directly to Deakin residents. The narrow information process and lack of information about intended height produced a limited community response to DV237. This was seen by ACTPLA to indicate limited community concern.

40. Residents have been ***confused by conflicting advice over agency responsibilities*** for planning controls on the site. ACTPLA has advised residents that ACTPLA sees the redevelopment as a suitable landmark and will agree to a seven storey redevelopment if this is approved by the NCA. The NCA has told residents it will await a formal approach from ACTPLA to review height restrictions. However ACTPLA has told residents that it would not make the approach to the NCA and this would need to be made to NCA by the developer. Clearly the process needs to be clarified.

41. Residents are also concerned that ***there is no direct process for public consultation on height issues***. DCPs do not provide for public consultations. The NCA has said it would take advice about public opinion from ACTPLA. ACTPLA has however advised residents that the DV process did not seek public comment about height (as this was an NCA issue). It would appear that the NCA will ask ACTPLA's advice on public opinion which ACTPLA explicitly didn't canvass.

Submission 7: that there is a coordinated interagency approach on the part of the ACTPLA and the NCA to planning controls on main avenues and main approach roads.

(vii) Development Control Plans

42. Residents have also been concerned about ***an apparent disregard by NCA of resident views***. There would appear to be a view in the NCA that residents do not have a genuine and legitimate stake in the outcome of planning controls on sites covered by DCPs. There has been no public advice by the NCA to residents about plans for "landmark" developments and "gateways" on NCA sites at the entrance to Deakin. The NCA is not required to consult or even advise residents about changes to DCPs which fundamentally affect citizens of this city.

43. Clearly the lack of a mechanism for public consultation in DCPs is a major issue. There may be some argument for DCPs to be simple administrative processes where and when no or minor planning issues are involved. In this case, however, the issue is major and will have far-reaching implications for Canberra. ***It is unreasonable in a democracy that residents of the national capital***

are excluded from making their views known to the NCA about the impact on them of changes to planning controls administered by the NCA.

44. Residents would also argue that the NCA should not take an ad hoc policy decision at this time about the height of buildings along Adelaide Avenue which would be different to that currently applying along other avenues e.g. new four storey apartments under construction along Canberra Avenue near Manuka. Such an action could also set a precedent for other Avenues.

Submission 8: that NCA's DCPs on main avenues and main approach roads be amended to include provision for public consultation.

TERMS OF REFERENCE: DV205

45. ***DV 205 raises similar issues to DV237***, with a change proposed to land use to permit development on the Oasis Leisure Centre site. The current use comprises a swimming pool, indoor recreation complex, gym and a combination of small associated commercial, community, health, recreation, educational and historical uses including child care centre, pathology laboratory and medical suites. The proponent (not the lessee) wants to develop a three storey office building of 2000 sq m GFA in association with an indoor swimming pool.

46. As with DV237 ***residents have strong reservations about DV205 which involves spot zoning variations to the Territory Plan to change the land use to permit higher order uses*** which generate greater capital gain on the sale of the land. There is particular concern that yet another site designated for Entertainment, Accommodation and Leisure Land Use would be lost.

GENERAL RESIDENT COMMENTS ON HOUSING POLICY

47. Residents are concerned about the Government's residential redevelopment policies that facilitate redevelopment for apartments and dual occupancies and do not provide affordable and sustainable housing choice. The high acquisition costs of buying land and demolishing existing buildings, betterment charges, holding charges, risk insurance, mark ups and other fees lead inevitably to higher housing prices and rentals and higher housing prices affect land values and rates in surrounding areas.

48. A preferable policy approach to knocking down houses and rebuilding would be to encourage recycling and better use of existing housing stock unless buildings are unhealthy or unsafe. Residents are not aware of any social/economic studies by ACTPLA that support this wasteful and costly "knock down and rebuild" approach. It would be preferable to encourage modest redevelopment ideally initiated by owner-occupiers to more effectively meet changing household and community needs over time.

49. All residential areas have cycles of growth and decline as the population changes. The decline of populated inner Canberra over the last two decades has largely halted (ref: ACT Government population forecasts for Canberra suburbs and districts 1998-2008). Most people who moved into the inner suburbs in the 50's and 60's are no longer there. New people are buying older houses, moving in, renovating and extending to meet changing and different needs, facilitating efficient use of the housing stock and existing social and physical infrastructure and services. This will go on without any strong demand for high cost residential high-density redevelopment.

SUMMARY OF SUBMISSIONS

Submission 1: *that ACTPLA be directed to seek expressions of interest in the further operation or redevelopment of the Embassy Motel site under existing land use before any consideration is given to a change of use.*

Submission 2: *that the Committee reinforces the intent of the Territory Plan and maintains the Embassy Motel site for entertainment, accommodation and leisure land use.*

Submission 3: *that the Committee reinforces the intent of the Spatial Plan which provides that higher density residential developments will not be dispersed throughout the suburbs and targeted only to those areas specified in the Spatial Plan.*

Submission 4: *that ACTPLA commission an integrated traffic and parking study, to be funded (but not carried out) by the developer, to ascertain the impact of traffic flows from redevelopment of the Embassy Motel and Solander sites, the DV200 zone and other foreseeable developments in Deakin*

Submission 5: *that ACTPLA advise the full cost of additional infrastructure and government services associated with this proposed redevelopment and other possible developments in surrounding areas of Deakin and advise how these would be recouped.*

Submission 6: *that any redevelopment on the Embassy Motel and old Solander sites remain within existing planning controls for predominantly three/maximum of four storeys as contained in DCP No 171/02/0009.*

Submission 7: *that there is a coordinated interagency approach on the part of the ACTPLA and the NCA to planning controls on main avenues and main approach roads.*

Submission 8: *that the NCA's DCPs on main avenues and main approach roads be amended to include provision for public consultation.*

Residents would appreciate the opportunity to meet with the Committee to discuss issues covered in this Submission.

Lodged with the Standing Committee by: Di Johnstone, Deakin resident
On behalf of: Members of the Deakin Residents' Association
Date: 7 March 2005