

Deakin Residents Association

The Committee Secretary
Standing Committee on Planning, Public Works
and Territory and Municipal Services
ACT Legislative Assembly

Comments on Draft Variation No 302 to the Territory Plan: Community Facility Zones

The Deakin Residents Association (DRA) has recently re-formed as part of the Inner South Canberra Community Council (ISCC), and is pleased to provide comments with respect to *Draft Variation No 302 to the Territory Plan: Community Facility Zone* (DVA302).

DRA's major concern with DVA302 is the insertion of a sunset clause to remove the requirement to respond to Neighbourhood Plans (NPs) after 1 January 2011. This amendment will create a void in community consultation if NPs are not replaced with a mechanism which effectively reflects community views.

The September 2009 policy review outlined a need to address the question:

"How can the outputs of ACTPLA's ongoing localised planning initiatives be best incorporated, where appropriate, into the Territory Plan?"

It also noted that:

"the current reference in the CFZDC to the existing local plans of the early-2000s is becoming outdated."

The DRA believes strongly that there is a need to ensure that appropriate and effective notification/ consultation/ engagement occurs with all stake-holders in the community.

Lack of proper and effective community engagement creates a risk that trust is placed in a limited range of solutions, without commitment to these by the broader community. Despite current claims that enough "consultation" has occurred, little is known of the impact of the introduction of any changes in the absence of effective engagement.

The most recent and comprehensive engagement with the Deakin community occurred in 2003 in the preparation of the Deakin Neighbourhood Plan.

It is noted that the draft proposes that future reference to these plans no longer be a requirement, viz.:

Element 5: Amenity¹

Rules	Criteria
5.1 Neighbourhood Plan	
There is no applicable rule.	C17 Where an approved neighbourhood plan exists, development demonstrates response to the key strategies of the relevant neighbourhood plan. This provision will cease to be effective after 1 January 2011.

We note that the draft paper proposes the inclusion of suburb precinct codes into Part 10 of the Territory Plan with respect to Community Facility Zones.

The DRA is of the view that this should extend to all zones (and not just those related to community facilities). We believe that there is an urgent and immediate need for this to occur with respect to RZ2 Suburban Core Zones, for example, where there is an expectation that "moderate levels of redevelopment can occur", although appropriate and effective measures for defining this have not been clearly articulated and means of enforcing this are not readily apparent.

Accordingly, the DRA would like to see the following key issues more fully addressed:

1. that the proposed suburb precinct codes – when fully developed in consultation with the Deakin community - stand as codes which replace and update the key elements of the (revised) 2003 DNP
2. that a mechanism be developed for regularly updating the precinct codes (as originally envisaged for the various neighbourhood plans) and that this should be through consultation with the various Community Committees – and the ISCC for those related to south Canberra
3. that, in recognition of the special nature of Canberra as a planned city, and the need for more effective notification/ consultation/ engagement - especially as compared to other Australian jurisdictions - the various Community Committees be more fully funded to enable them to provide information, consultation/engagement, and also advocacy, on behalf of their constituency to initially develop more effective suburb precinct codes (including with

¹ Page 11 Community Facility Zone Development Code – May 2010

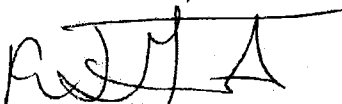
respect to RZ2 Suburban Core Zones) and for ongoing participation in the process.

In development of the suburb precinct codes, the DRA would like to see measurable indicators set in place which are specific to Deakin to shape expectations for all participants, in all areas of planning, to create an integrated outcome. We will be seeking outcomes which address, in a fully integrated way, contemporary and emerging needs, as well as intergenerational needs. The proposed draft does not achieve this.

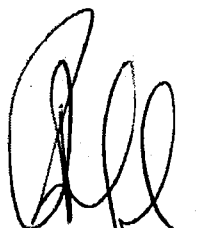
We will be seeking specific and measurable indicators with respect to Deakin in a number of areas, for example:

- sustainability of the existing Deakin community facilities consistent with a vision for the future of Deakin, as part of a garden city, and consistent with broader Deakin neighbourhood characteristics
- development of measures more generally related to Deakin as part of a garden city, including maintenance and enhancement of the existing streetscape
- constraints to expansion of the current commercial/retail spaces
- limits to growth of the current Grammar School(s) population
- development of measures to support the maintenance of existing Deakin characteristics related to scale, form and site development, including with respect to setbacks, and explicit height limits to buildings
- more specific measures to manage parking (including off street parking) and management of traffic flows having regard to current and future demand patterns
- maintenance of the existing three/four bedroom residential units as the dominant form, and encouragement of age in place, having regard to maintenance of the existing demographic
- identification of explicit measures to meet the existing RZ2 expectation with respect to "moderate levels of redevelopment"

Finally, we have seen and support the detailed submission provided by the Griffith/Narrabundah Community Association Inc. which has been provided to you separately.



Krystyna Fitzgerald



Peter Wurfel

30 May 2011