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Woden Valley Community Council Inc.

Submission

Draft Variation to the Territory Plan No 344

Woden Town Centre

September 2017

The Committee Secretary
Standing Committee on Planning and Urban Renewal
Legislative Assembly for the ACT
GPO Box 1020
CANBERRA ACT 2601

Summary

Thank you for the opportunity to provide a submission to the Standing Committee on Planning and Urban Renewal's Inquiry into Draft Variation to the Territory Plan No. 344: Woden Town Centre: Zone changes and amendments to the Phillip precinct map and code.

This submission builds on the Woden Valley Community Council's June 2017 submission to the Chief Minister, Treasury & Economic Development Directorate's consultation process.

The question is – Does the draft Precinct Code embody planning principles that reflect the desired outcomes for the current and future community?

The planning principles included in the Woden Town Centre Master Plan include:

- community and educational facilities located strategically to strengthen the pedestrian network and create more diverse and lively areas;
- parks and public spaces to make the centre a more attractive place for people and provide opportunities for play, physical activities and passive recreation;
- a clear pedestrian and cycle network into the centre and along main routes to provide connections between the precincts and to public transport; and

Unfortunately, these planning principles have not been included in the draft Precinct Code which provides for residential towers but does not meet the community's needs for community facilities.

In order to facilitate densification on the transport route, the WVCC supports residential development (using lower buildings) and the associated community facilities and open spaces required to support a growing population.

Woden is Canberra's first Town Centre and is centrally located. It hosts Commonwealth Departments and is close to jobs in the Parliamentary Triangle - it should be thriving with activity built up over 50 years.

Instead facilities in Phillip have closed, for example, the CIT, basketball stadium, bowling alley, bowling greens, tennis courts, pitch n putt, commercial buildings and night clubs. The future of the pool and the ice skating rink are at risk and Woden has never had a community/arts centre. Policies that have allowed the closure of significant community assets have left little activity in the centre and a lack of confidence in Woden, by both the community and the private sector.

Planning for Woden originally included an east west pedestrian link (from the library through the town square to the bus interchange) that hosted a number of Woden's community facilities. The 2004 Woden Master Plan included a concept plan that continued the east west link and identified community and recreational facilities.

Although the vision in the Master Plan provides for the town square to be the place for the community to meet and socialise, this concept appears to be diminished with the precinct code including 28 storey buildings around the town square that will overshadow the square

and reduce 'placemaking' in the area. Consultation for stage 2 of light rail also overlooked the east west pedestrian link by locating the station south of the bus interchange.

To instil confidence in the policy settings for Woden the draft precinct code needs to be reconsidered with the community at the forefront of the plans. Attractive public places need to be created so 35,000 people in Woden and 30,000 people in Weston Creek and Molonglo have a place to meet in their Town Centre.

The policy framework included in the *National Capital Plan* and the *Territory Plan* include Town Centres that are relatively self-contained for the community to live, work, learn and socialise in their town centre.

Development of the business case for light rail stage 2 provides the opportunity to integrate transport and land use planning. It is vital that the community understands where stations will be, how densification will occur, how precincts will be connected and where community facilities, open spaces and entertainment areas will be.

The WVCC is pleased to participate in the Chief Minister's vision for Canberra, as stated in his document - CANBERRA: A statement of ambition:

*'Celebrating our Centenary has helped us focus on what's special about our city and confirmed our exciting future. **As a government and as a community**, we must build on that feeling, and **create that future, together**'. Cities don't succeed by accident or by leaving things to chance – they require design, **good governance and great collaboration**'.*

The WVCC notes that the Gungahlin Precinct Code contains many features that are not included in Woden's draft precinct code, for example, an entertainment precinct, a community and recreation facilities precinct, sites for surface public car parking, a cycle network and public transport stops. See comparison of the Town Centre Precinct Codes at **Attachment A**.

The WVCC requests that stakeholders work together to identify sites for social and cultural facilities, including a community/arts centre, a CIT, a multi-purpose sports hall, a public pool, a cycle network and open green spaces to include in the Precinct Code. These assets are not commercial in nature and are unlikely to be provided by the private sector. Investment by the ACT Government in these assets will create activity and provide confidence in Woden, facilitating investment by the private sector.

Woden is on the cusp of change due to development and in order to realise our potential we recommend that the Minister declares the Woden Town Centre as an Urban Renewal Precinct under the *City Renewal Authority and Suburban Land Agency Act 2017*.

Issues with the July 2017 draft Precinct Code

The WVCC recommends the following changes to the draft Variation. See **Attachment B**:

1. Densification (building heights should be lower and stated in metres)
2. Town Square – as the central activity point, retention of the current buildings on the perimeter for solar access in the cooler months;
3. East west spine – retention of solar access;
4. Agglomeration of activity in a central area - identification of sites so the area is not built out:
 - a. an entertainment precinct;
 - b. a higher education facility;
 - c. a community/arts centre;
 - d. a pool;
 - e. a multi-purpose sports hall;
5. Active living/ connectivity - identification of alignments for cycle paths;
6. Identification of open green spaces, including.
 - a. retention of Arabanoo Park as open space

Comments on the Draft Variation to the Territory Plan No 344

Comments about the precinct code are provided on the draft Precinct Code at Attachment X

1 Explanatory Statement

The opening statement that the draft variation incorporates the recommendations of the 2015 Woden Town Centre Master Plan, which builds on the 2004 Master Plan, is dubious.

Recommendation 6.2 states that the Precinct Code will provide the opportunity for the building heights, setbacks and land uses outlines in the Master Plan to be realised as development occurs. Section 3.4 of the Master Plan outlines land use, including zones, community facilities, sports and recreation facilities, the northern entertainment, accommodations and leisure precinct, town centre living and commercial and retail centre.

The draft Precinct Code provides for building heights and setbacks however it does not provide for community facilities. The 2015 Master Plan diminishes the benefits of the 2004 Master Plan by ceasing to provide a map that identifies community facilities. See 1970 map at **Attachment C** and the 2004 map at **Attachment D**.

The Master Plan states that 'in the In the short to medium term it is likely that urban intensification through population growth and the increase in people working in the master plan area will create additional demand for community facilities and service provision'.

The draft Precinct Code does not explain the context in which the Precinct Code is developed such as the government's commitment to stage 2 of light rail. This is important as it will have implications for densification along the transport alignment and population

growth. This will mean that residential towers will be built, however there is no identification of sites for community facilities, open spaces or a cycle network.

The Site Description in the draft Precinct Code states that the Centre contains a number of important community, education and recreation uses, including the Canberra Institute of Technology. This facility is closing in Woden and to refer to it as a part of the site is inaccurate.

2 Draft Variation

2.1 Variation to the Territory Plan map - Rezoning – see Attachment E

The WVCC **does not support** rezoning Woden Park/Arabanoo Park as the Town Centre is abundant with empty blocks and carparks that could be used for community facilities and the case to rezone this open space has not been made.

Before any open spaces are rezoned, a review of the requirements for open space should be undertaken.

There has been a reduction of open green space in Woden with the loss of: the green courtyards in the Alexander and Albemarle building, Athllon Drive open space for densification, the proposed expansion of the cemetery into 3 hectares of Eddison Park and the pitch n putt is likely to be developed.

It is a great concern to the WVCC that open space can be sold or rezoned without any plan for the community's requirements for open space. Aside from Eddison Park, there is now very little green open space in the Woden Town Centre and we note that the pocket park north of the library is zoned as CZ2 and could be developed.

2.2 Variation to the Territory Plan written statement

Precinct Code Attachment A – Assessment Tracks

There is no explanation of the need for the prohibited developments in Table 1 and the additional merit track development in Table 2. It is not clear why:

- PD1 – prohibited residential development is where it is and the size it is?
- PD2 – a variety of developments are prohibited in this area?
- PD3 – residential use is prohibited in Table 1 but Figure 2 allows 4 storeys in area 'f'?
- MT1 – the existing cemetery requires the additional merit track?
- MT2 – a scientific research establishment is identified?
- MT3 – a produce market requires additional assessment?

Although the RC2 Yamba Drive Corridor Site is identified in Attachment A of the Precinct Code there are no longer any additional rules and criteria about the number of storeys, setbacks and materials and finishes. There is no explanation about why these rules and criteria have been removed.

Precinct Code Attachment B – Additional Rules and Criteria

RC1 – Woden Town Centre

1.1 Figure 1 - Existing car parks, active frontages and community recreation facilities

Primary active frontages are welcome however a central area for activity should be identified in this Figure. The Master Plan identifies the Town Square for the central focal point for community activity.

The vision in the Master Plan is:

'Woden Town Centre is a major community and commercial hub for the Woden Valley and wider Canberra region. It will be a place that attracts people to live, work, socialise and enjoy throughout the day and evenings. The town square is the central focal point for social and community activity that will connect people to a network of safe and active streets and public parks'.

The draft Precinct code provides for 28 storey buildings around the Town Square which will make it difficult for the Square to become 'attractive' and 'comfortable' for the community. The overshadowing is likely to continue the current situation of people moving through the square and not stopping, leading to a continuation of the lack of activity in the square.

The 2004 Master Plan included a new entrance to Westfield from the Town Square. This has not been implemented and it is not clear why Westfield does not activate the northern side of its building that faces the Square. This is the sunny side of the Square, but with overshadowing and no activation of the frontage, the vision of the Town Square as the central focal point for social and community activity is unlikely to eventuate.

Similarly, if the east west link does not host community facilities as was planned in the 1960s, and is overshadowed by tall buildings on its north side, activity will be reduced.

This will provide very poor outcomes for Woden residents. Overshadowing map at **Attachment F**.

The title of Figure 1 includes community recreation facilities but does not identify any. This is an oversight and we request that the community recreation facilities be included in the diagram. The WVCC supports the statement in the Master Plan that community and educational facilities should be located strategically to strengthen the pedestrian network and create more diverse and lively areas. Figure at **Attachment G**.

Entertainment precinct

The draft Precinct Code needs to identify where the focal point for community activity will be so that activity is not scattered across all active frontages with no focal area of vibrancy.

An alternatives site for an entertainment precinct should be identified for the community to meet in a comfortable environment. The WVCC recommends that the car park between the Hellenic Club and the bus interchange be designated as an entertainment precinct, where

music (noise) is allowed, and should be included in the draft Variation. Development of residential buildings in this area should be subject to the noise attenuation requirements contained in the multi-unit housing development code.

Community Facilities

Co-location of community facilities and services in a highly accessible Town Centre will contribute towards diverse and active precincts.

Repurposing of buildings should be considered, community facilities are preferable to high rise buildings on the north side of the east west pedestrian connection which requires maintenance of the human scale and solar access for social and community activity in the Square. For example, rather than demolition, Borrowdale House could be a Community Centre and the Medibank building a CIT.

R4 - Areas 'c' of Figure 2? Why is residential use allowed on the ground floor on Callum St when it is primary active frontage and is on the light rail corridor?

R5 – The Master Plan states - To secure the centre as a major employment base, larger sites in the Town Centre core must be retained for new office development in the long term, such as Block 1 Section 7'. Section 7 is a large block and should be used for the best use for the community, given that the town square is to be overshadowed, this block could be considered for the entertainment area 'a piazza'.

R7 – We note that all surface car parks can be developed. It becomes vital to identify open spaces so all sites in Woden do not become high rises. The WVCC recommends that a plan be developed to identify land use prior to selling all government owned land to the private sector for residential towers.

R8 – requires development of the swimming pool and ice skating centre comply with all of the following:

- a) provides or retains an ice skating rink suitable for national ice hockey competition
- b) provides or retains a 50-metre public pool with direct public access to Irvine Street
- c) development for other uses involves redevelopment of the pool as an indoor facility.

The government is currently planning a new pool at Stromlo and new ice skating rink. If a new ice skating rink is built elsewhere in Canberra it is unclear that the existing ice skating rink or construction of a new one on the site will be financially viable. As the ice skating rink subsidises the pool, both facilities are at risk of closure and the facility being boarded up because it cannot meet the rule.

This rule needs to be reconsidered to ensure the community is provided with a great outcome for a pool and ice skating rink.

2.1 – Figure 2 - Building heights

R9 - In order to increase the population in Woden to support the sustainable demand for commercial activities, the WVCC supports urban infill. Residential developments must minimise overshadowing and maintaining human scale. Taller buildings up to 16 storeys should only be sited where they do not overshadow community amenity, eg overshadow Hindmarsh Drive or Westfield.

Building heights on the perimeter of the Town Square should remain at 3 storeys to provide sun into the Town Square. Higher buildings cause unacceptable overshadowing. Proposed building heights are at **Attachment H**.

Wind shear is a major problem in the Woden Town Square and every building must have mechanisms to mitigate its impact on the community's comfortable access to the area.

We note that community consultation on the draft Master Plan provided mixed views on the proposed building heights in the Town Centre and that most submissions supporting higher building heights have been from the private sector.

C9 - Additional four storeys

The final Master Plan provides for additional storeys to be considered when the development:

- is supported by a visual impact assessment that addresses landscape setting, town centre urban form and relationship to surrounding development
- maintains the building height hierarchy of the centre
- does not increase overshadowing on nearby residential development or key public spaces such as the town square
- provides an increase in the required number of adaptable units to provide for an aging population
- provides off-site works as part of the development; this could include verge works or upgrades to adjoining areas of open space, and
- provides a mix of residential units.

Unfortunately the spirit of this paragraph has not been included in the draft Variation which provides the following at Criteria 9:

The maximum height of building, for one building tower element per block, in areas 'a', 'b' and 'c' may be increased by an additional four storeys where development achieves all of the following:

- the development maintains the building height hierarchy of the centre by retaining the taller buildings at the middle of the town centre; and
- development is close to public transport stops and stations.

The similarity between the Master Plan and the draft Variation has been underlined. Rather than provide some public policy and scrutiny to ensure better outcomes, the draft Variation

appears to allow a development application to be 'ticked off' as every development put forward will meet the building hierarchy criteria and be close to public transport.

The WVCC considers Lovett Tower should retain its status as the tallest building in Woden and does not support any building that would be higher than the Lovett Tower. The WVCC does not support the general rule of an additional four storeys on the building heights due to the human scale and overshadowing.

C10 – cycle networks

For development that is 12 storeys and above, the applicant shall provide a visual assessment that:

- a) Provides a description of the project and assessment of the physical and visual environment (local context) for the site and surrounding areas including existing landform, vegetation, land use, cycle and pedestrian connections, streetscape and nearby developments.
- b) Provides analysis and relevant illustrations of the key views and approach roads to the proposed development that addresses potential impacts that the development could have on the surrounding landscape character and visual amenity.

The visual assessment does not guarantee that the existing cycle network will align with a proposed cycle network. A cycle network is not defined in the draft Precinct Code and any alignment required for a cycle network in Woden is at risk of being built out by a developer.

The cycle network should be identified in the draft Precinct Code in order to provide active transport and confidence in the development of the cycle networks in Woden.

C11- C13 - Marker buildings

The Master Plan states that 'opportunities for marker buildings in strategic locations are promoted to help people identify that they have entered the centre or to assist them to orient themselves as they move through the centre'. The WVCC rejects this concept, visitors can use GPS technology or a map. This policy values visitors more than the community living in the district.

C11 – This site (Tradies) has been approved at 17 or 19 storeys, the draft Precinct Code should acknowledge the reasons why the height was reduced?

C13 - A marker building in section 81 is permitted up to RL670AHD. The draft Precinct Code should provide the height in metres and reduce to 12 storeys to retain human scale in this area.

R14 – should ensure that the open spaces in Colbee Court and Dundas Court are not overshadowed.

R16 – solar access in the Town Square should be ensured for business confidence and the enjoyment of the community as this area as it is supposed to be the focal point for

community activity. Although the Code now includes a minimum of 3 hours solar access to at least 1,000m² of the town square, this is still not adequate for a public area of such importance. Cafes need certainty of patronage throughout the entire day and the entire year.

Developments in the wrong place will impact the vibrancy of Woden for decades to come, particularly on the Town Square, where 28 storey buildings will cast shade onto the Square for most of the year.

R22 – Section 7 is a significant central area in Woden. A road through it was not included in the Master Plan which says: To secure the centre as a major employment base, larger sites in the town centre core must be retained for new office development in the long term. The Master Plan also identifies a car park and a linear park on section 7. The best use for this significant car park needs to be determined so opportunities are not lost.

Figure 3 – the Figure does not include the east west link that has been a part of the planning for Woden since the 1960s.

Identification of open green spaces

The WVCC notes the significant loss of open green spaces in an ad hoc manner and without a plan for the requirements for open space in the future. Once open space is provided for other activities, for example, a development or a cemetery, it cannot be retrieved and reinstated as open space again.

The WVCC does not support:

- the rezoning of the Arabanoo Park to community facilities land until a plan for the siting of community facilities is developed;
- the use of 3 hectares of Eddison Park to expand the cemetery;
- the loss of all the open green areas along Athllon Drive;
- the loss of the open green courtyards at the Alexander and Albemarle sites; and
- the loss of the pitch n putt site.

The WVCC supports the development of a long term solution in the south of Canberra for our burial needs. The loss of our loved ones is a very important issue and should be prioritised as such with a Budget commitment to build the Southern Cemetery.

Environment

The Master Plan states that better quality green spaces in the centre will provide attractive spaces for people to linger and enjoy. Large canopy trees will provide shade and improve pedestrian amenity. Trees also provide the canopy for birds.

In light of the closure of the CIT, the WVCC supports identification of community facilities, the inclusion of cycle paths, open green spaces and deep rooted trees in the draft Variation to ensure they are protected from future development.

Light rail

The WVCC requests the ACT government establish a team to undertake studies to integrate transport and land use planning and work across all areas of government to ensure the needs of the community are met.

In response to a question from Ms Caroline Le Couteur MLA in the Legislative Assembly on 31 March 2017, Ms Meegan Fitzharris MLA responded as follows:

'The current master plan for the interchange assumed the participation of the owners of Westfield Woden Plaza in the redevelopment of the bus interchange precinct. The redevelopment of Woden Plaza to support the new interchange, as envisaged in the master plan, is unlikely in the foreseeable future. The design of the interchange precinct therefore needs to be reconsidered.'

'The design of the second stage of light rail will be integrated with the ongoing modernisation of the Woden Bus Interchange. The design of the new public transport node will progress as part of the current light rail master plan. The master plan will inform the funding and timing of future improvements.'

The current bus interchange may no longer be required and a better use for the area should be identified. We have a unique opportunity to provide a fantastic area between the Hellenic Club and the structured carpark to the south. This is a large area on the light rail alignment and could be planned to provide an entertainment precinct for the people of Woden, Weston and Molonglo.

The key is to design the area, inclusive of community facilities (that are not revenue raising) and allow the private sector to compete for development rights.

Community Facilities

Community / Arts Centre

The Woden Town Centre is in critical need of a Community / Arts Centre. For too long the community has not had a facility to gather to hold events and celebrations. The only community meeting room in the Woden Town Centre is the Library and this room is very small with no out of hours access.

The Woden Community Services are working from substandard accommodation which has no access for drop off and pick up for the child care and sees the staff scattered across four buildings to deliver their valued services. This is not a sustainable proposition.

CIT

Education is important to a community, there is an imbalance in the location of higher education (and the economic activity from 16,000 jobs) in Canberra.

The Woden CIT is in the process of closing. We have concerns about the impact this could have on the economy of Woden from the reduction of:

- jobs - the sector employs 16,000 people
- access to higher education for the residents
- vibrancy from young people located in the area – patronage of cafes etc...
- confidence in the region
- wider economic benefits from the knowledge economy

It is not clear why synergies with the Canberra Hospital are not explored and fantastic courses for all of Canberra's residents delivered from the Woden CIT.

The 2015-16 Budget (BP 3 Ch 3 New Initiatives) contains the following measure:

CIT Modernisation – Tuggeranong, Bruce and Reid campuses

The Government is delivering a new Canberra Institute of Technology (CIT) campus at Tuggeranong and upgrading the existing Bruce and Reid campuses as part of the CIT Campus Modernisation Strategy. The initiative will support increased utilisation of facilities and allow CIT to deliver courses where there is the greatest community demand. Part of the CIT Campus Modernisation Strategy, and linked to this initiative, will be a transition out of CIT's current Woden campus in mid to late 2016 as functions are transferred to Tuggeranong, Bruce and Reid Campuses. CIT is actively seeking opportunities to provide a community campus in the Woden Town Centre. The proposed move to Woden would provide CIT with a more modern learning environment and have the advantage of being more accessible for the public and closer to public transport.

We note that the 2016 CIT *Strategic Compass 2020 –Evolving Together* document does not mention Woden or Weston. In a section called 'How we are Evolving' the document states:

We will build upon the ACT health precinct in Bruce by co-locating our health and fitness programs in custom designed facilities at CIT Bruce.

It is not clear why there is no plan to evolve together at the Woden CIT as it is located next to the Canberra Hospital.

Finally, on a couple of occasions the Chief Minister has stated that the closure of the Woden CIT is a matter for the CIT Board and not a matter for the ACT Government.

We note that under s6 of the *Canberra Institute of Technology Act 1987* the Minister approves the functions of the CIT and may direct those functions, and under s7 the Minister may also give a direction to the institute in relation to the exercise of the institute's functions.

Multi-purpose sports hall – basketball stadium

There is a high demand for indoor sports facilities in Woden. The Woden sporting community has to travel north or to Tuggeranong to participate in indoor basketball, futsal, netball and badminton competitions.

The ACT Government's 2015 *ACT Indoor Sports Facilities Study* finds that:

'Current demand is driven by a shortfall of available facilities to support competition and lack of access to courts for training. In addition there is the pending loss of 3 courts in the Woden Basketball Stadium and the 1 court at CIT Woden which, if the Woden Town Centre is to be a focus for higher density living, is an issue for creating a contemporary urban precinct supported by a range of sport and leisure facilities'.

Again, leaving the district for sporting activities does not contribute to vibrancy in the Woden Town Centre.

The 2016 Labor and Greens Parliamentary Agreement includes a commitment to undertake feasibility studies into the construction of two multi-purpose indoor sports centres in Woden and Gungahlin.

We look forward to contributing to the delivery of this measure.

Attachment A

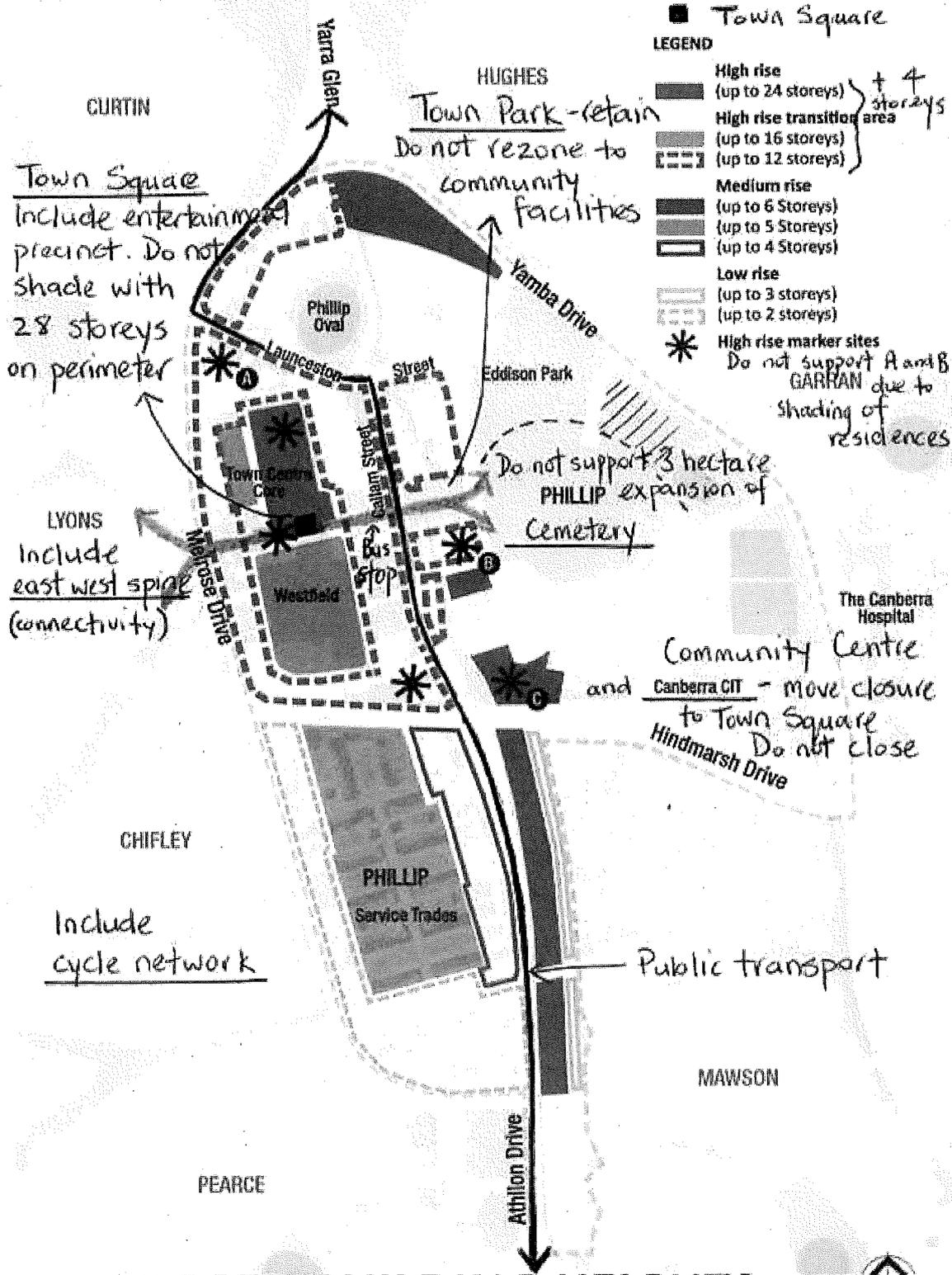
Comparison of the Town Centre precinct codes

- lack of equity between the features of the town centre precinct codes.

Precinct Code	Draft Woden	Belconnen	Tuggeranong	Gungahlin
Date	March 2017	14 December 2012	21 August 2015	28 August 2015
Building heights	28 storeys	No limit - Minimal detrimental impacts, including overshadowing and excessive scale	38m approx. 12 storeys	various
Road hierarchy	no	no	no	yes
Pedestrian and Cycle network	no	no	no	yes
Bushfire protection	no	no	no	yes
Leisure and Accommodation area	no	no	yes	no
Entertainment precinct	no	no	no	Yes – noise allowed
Public Transport stops identified	no	no	no	Yes – provide comfortable environment for public transport patrons
Sites for surface public car parking	no – can be developed	no – can be developed	no – can be developed	yes
Design of public realm	no	no	no	Hibberson Street Gungahlin Place
Active frontage	yes	yes	yes	yes
landscaping	1	no	some	Yes - Inc. trees around car parks to provide shade
Major community and recreation facilities precinct	no	no	no	Yes - building height 14m Minimal detrimental impacts, including overshadowing and excessive scale

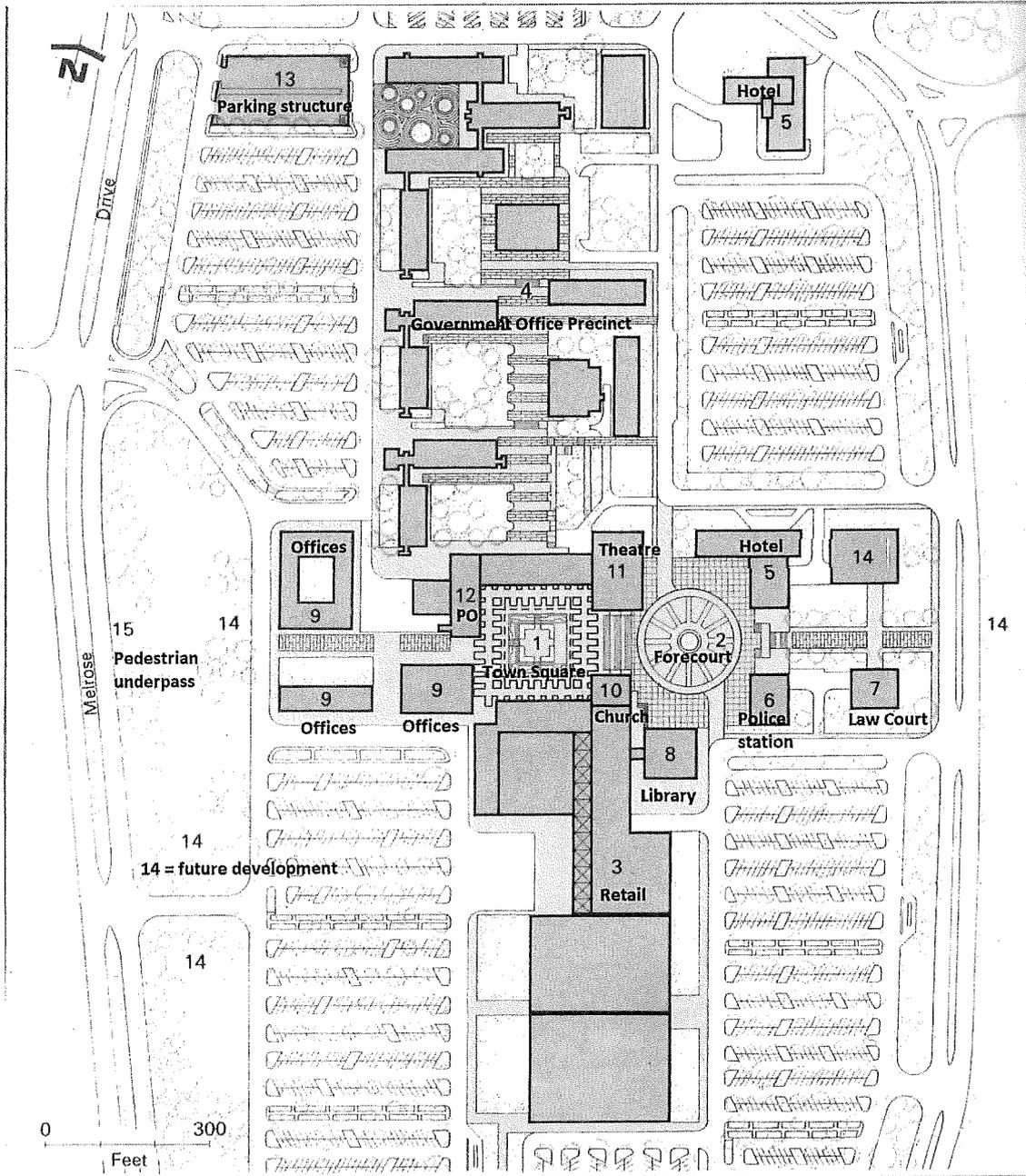
Some recommended changes to the Territory Plan

Figure 42: Proposed building heights



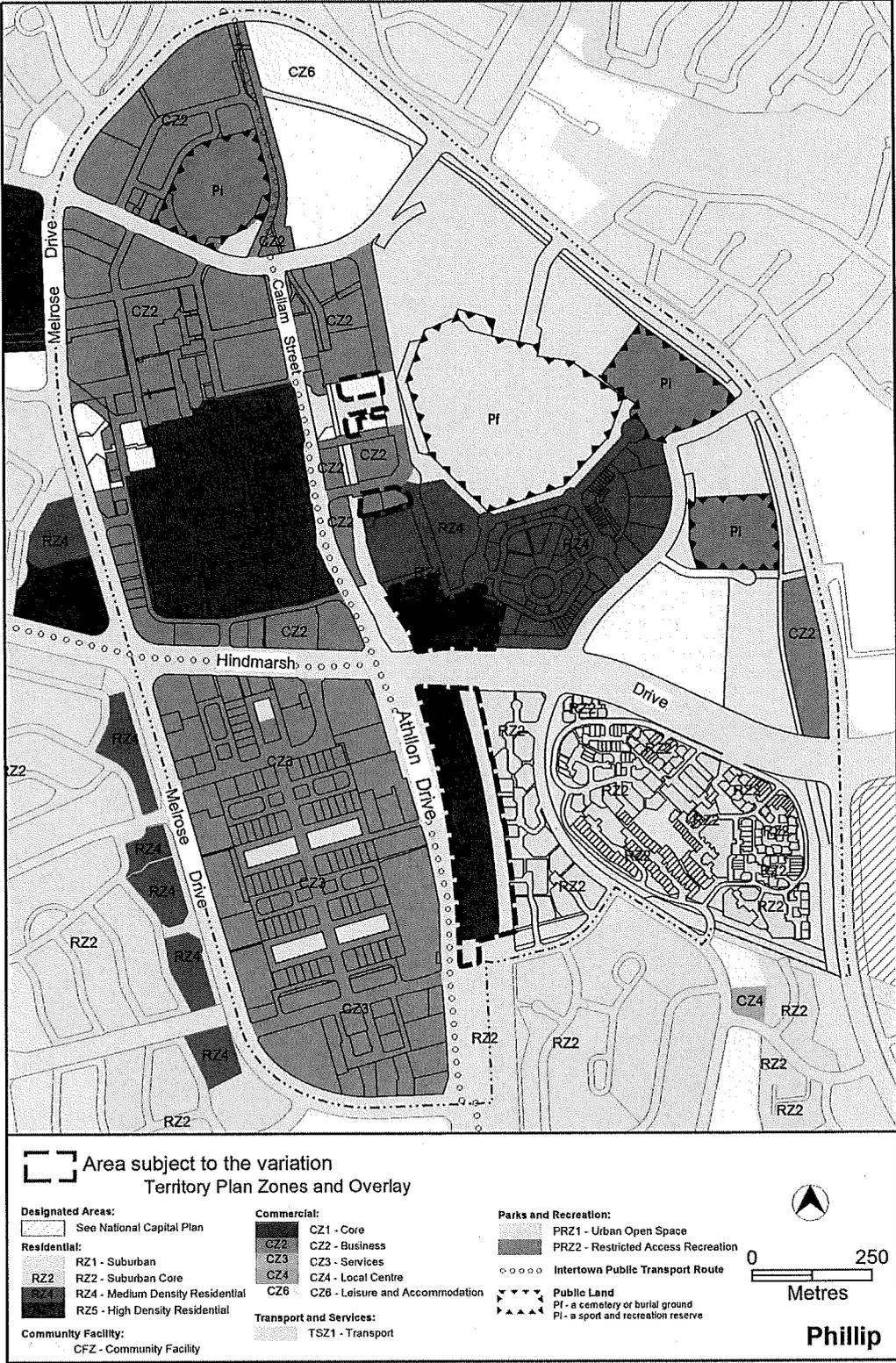
Attachment C

Woden 1970 map – shows community facilities on east west spine



Areas subject to rezoning

- Retain Arabanoo Park as open green space



Overshadowing of the Woden Town Square

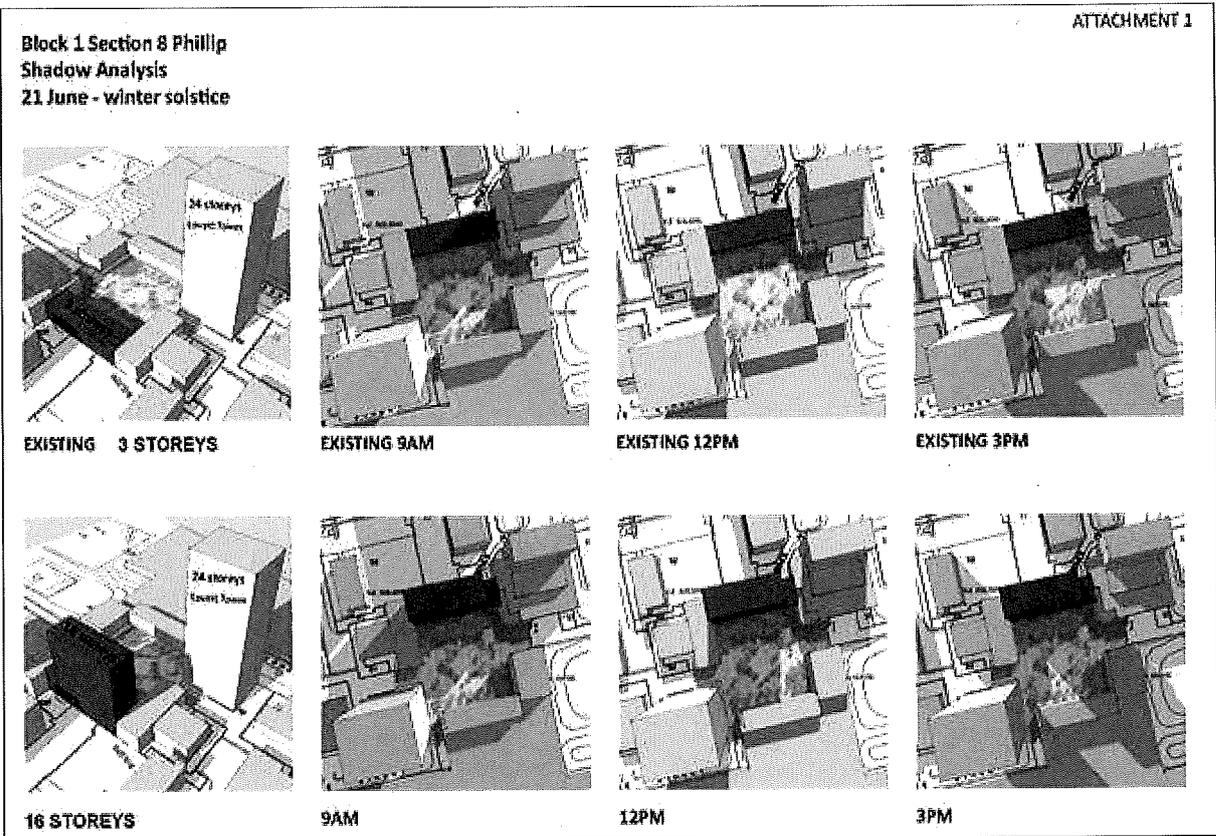
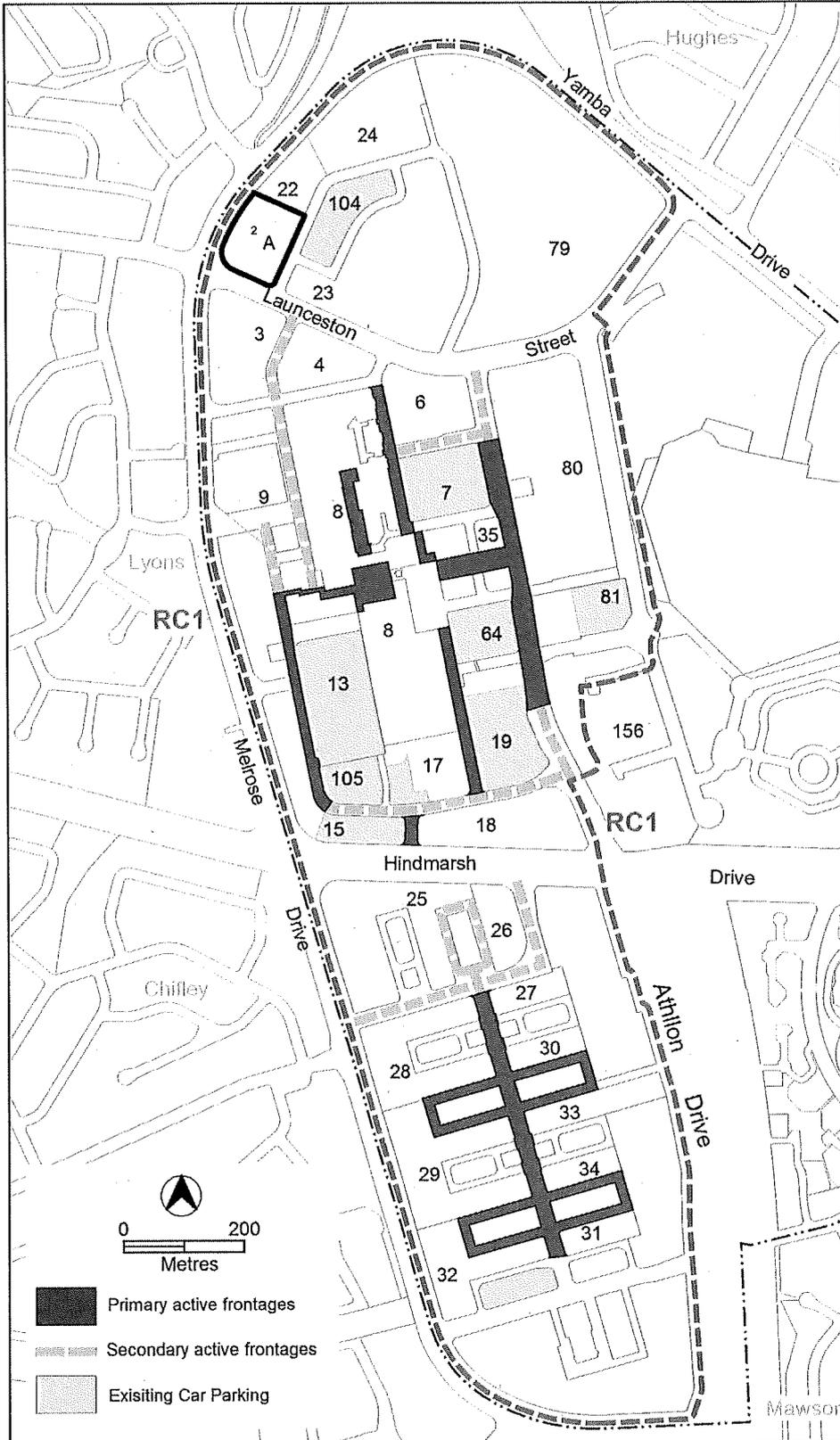
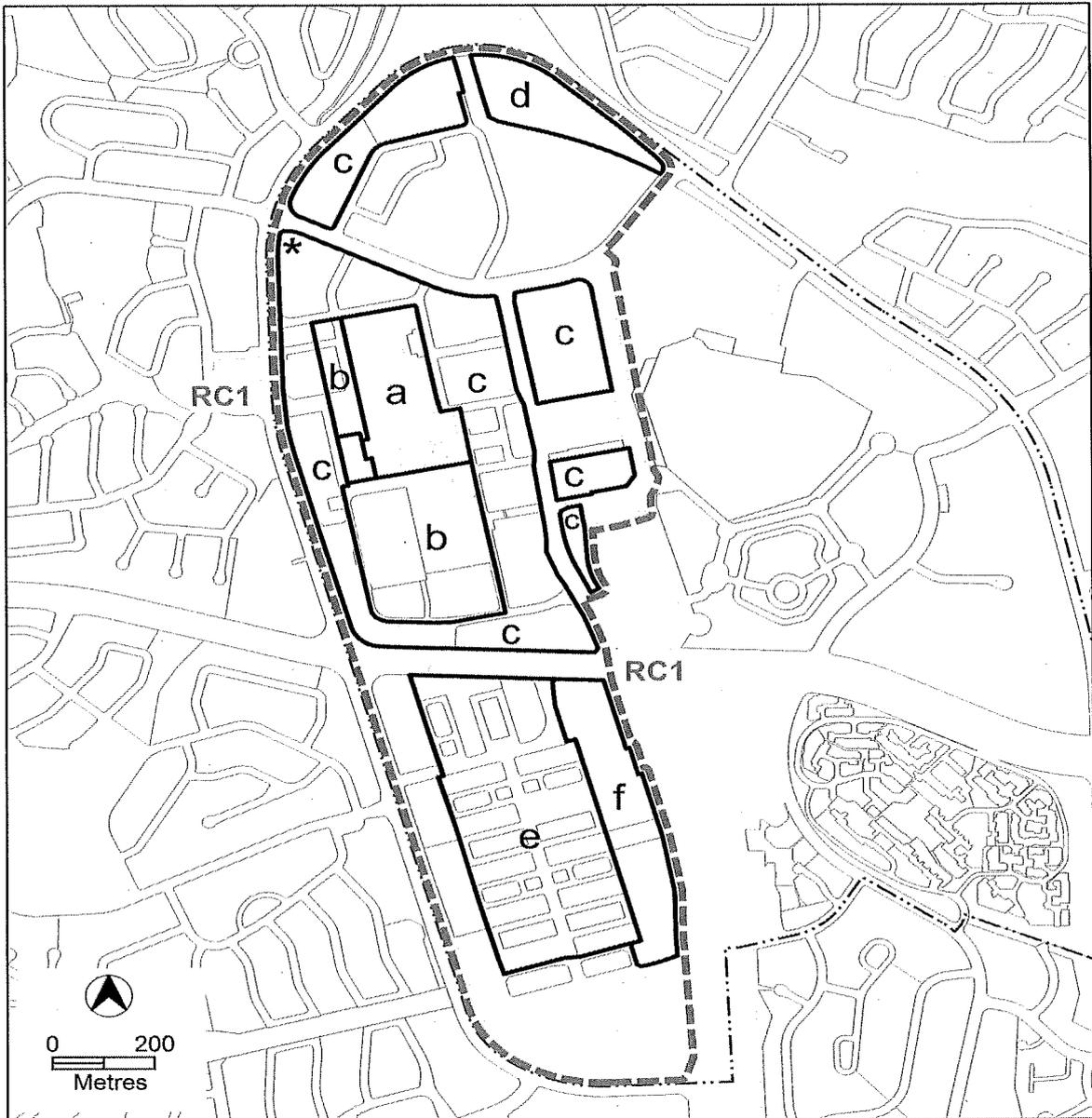


Figure 1 Existing car parks, active frontages and community recreation facilities – however there are no community facilities identified



Proposed building heights



a - 12 to 16 storeys with the existing 3 storeys on the Town Square

b - 12 to 16 storeys

c - 4 to 6 storeys on Callum Street (entertainment precinct)

c - 4 to 6 storeys on Melrose Drive

c - 12 to 16 storeys on Hindmarsh Drive (shades the road)

d - 5 to 6 storeys

e - 5 to 6 storeys

f - 4 storeys but in a PD 3 area (prohibited residential use)

Building heights of 4 to 6 (medium rise) adjacent to the suburbs with 6 to 8 storeys for 'transitional' areas (with big trees in front) for human scale. Some taller, 12 to 16 storey buildings, should only be permitted where they do not overshadow public spaces or other residential