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2<sup>nd</sup> March 2023

ACT Planning System Review and Reform Project Draft District Strategies and Draft new Territory Plan

via https://yoursayconversations.act.gov.au/act-planning-review/provide-feedback

Dear Sir/Madam,

#### **RE: DRAFT DISTRICT STRATEGIES.**

Knight Frank Town Planning have been engaged to collate and prepare a submission in relation to the Draft District Strategies 2022 and draft new Territory Plan and the policies and strategies identified in relation to the CZ6 – Leisure and Accommodation zoned lands in Stirling.

There are two parcels of land, being Block 5 and Block 92 of Section 24 Stirling.

Block 5 is a developed block occupied by the Weston Creek Labor Club and incorporating the Weston Creek Lawn Bowls facility.

Block 92 is an undeveloped parcel of land under the custodianship of City Presentation despite the CZ6 zoning. It is not clear why this parcel of commercial land has never been developed and remains under government ownership. We assume, that at identified in the draft District Strategy, the district is well served by existing facilities and since the early development of the suburb no unanswered demand has been identified, hence the land has not been released for development. This seems like under utilisation of land when other demands, such as future housing demand and providing for housing choices and resident down sizing have been identified and key issues for the community.

# The aims and role of the District Strategy.

The aims of the Draft Weston Creek District Strategy, to quote from the Minister's statement on page 5 of the draft document, are that

Canberra is one of only a few cities planned from day one—and planned to be nestled in the landscape. As our city continues to grow, we are planning for its future. We are considering our planning legacy and heritage values, our place as the Nation's Capital.

...

The district strategies will be part of our new, contemporary and best practice planning system that keeps our valued urban form and connection to the natural landscape and helps make Canberra a unique and welcoming place to live."

Below we have extracted key elements of the Weston Creek District context.

# **Draft District Strategy – Weston Creek.**

Weston Creek is the smallest of the ACT's nine districts in terms of land area. Modest population growth is projected in coming decades. Alongside nine local centres, the Weston group centre (Cooleman Court) is the main location for employment and higher order citizen needs. Weston group centre currently caters to residents in the Molonglo Valley while that district is still developing.







Given its smaller size, Weston Creek does not have its own town centre. The Weston group centre is the main district hub with Cooleman Court and a concentration of employment and access to community facilities and services. For higher order needs including health and business services, the district has traditionally relied on the nearby Woden town centre.

Weston Creek is serviced by a rapid bus route that connects the Weston group centre into the City Centre via Cotter Road and Adelaide Avenue. Most of the district is serviced by local buses travelling along collector routes connecting local centres to the Woden bus interchange.

Weston Creek's urban form is characterised by large blocks with predominantly low-density single detached dwellings (82%). This is similar to districts like Tuggeranong and Belconnen, which were developed based on culs-de-sac and suburban planning principles.

Weston Creek has the lowest share of housing in apartment dwellings (4%) across the districts, and one of the lower shares of medium-density dwelling types (14%). The larger block sizes may provide some opportunities for more medium-density housing forms to address the identified demand in future, provided that this type of infill development is delivered in appropriate locations and can contribute to other sustainable neighbourhood aims, including enhancing the blue-green network.

Weston Creek has nine local centres, many of which are currently performing well except for Fisher, which will need specific attention and possible investigation of appropriate planning and non-planning initiatives. Overall, Weston Creek generally ranks well in socio-economic indicators.

Weston Creek has the largest share of population in the retiree age group (over 65) of any district, at 21% in 2021. With an older population the types of facilities and services may be different to other districts, and accessibility becomes a more important issue. It has been acknowledged that the district is relatively well serviced, with community facilities concentrated around the group centre and in nearby Woden however the District Strategy notes that the provision of facilities needs to respond to changes in demand over time.

## Community expectations

In developing the new District Strategies, the ACT engaged with the local communities. The feedback from this engagement initiative informed the analysis and preparation of the District Strategy. For the Weston Creek District, feedback from the community confirmed the following emerging key themes.

Compact and Efficient city	Diverse Canberra	Sustainable and Resilient Territory	Liveable Canberra	Accessible Canberra
Cater for downsizing.	Maintain natural areas like Coolo Park.	Connect people with nature.	Maintain and expand community meeting spaces.	Provide a 'park and ride' service in Duffy.
Provide flexible spaces that can cater to COVID-19 challenges.	Maintain skate park.	Upgrade Cooleman Court.	Include a playground with toilets, seating, oval and café nearby.	Provide direct buses to Belconnen and more rapid services.
Enhance spaces where the community can meet at local shops, parks and Featherstone Gardens.	Maintain village feel by controlling building size and scale.	Encourage battery storage and vehicle charging stations.	Maintain low density planning.	Move to electric buses.
Limit and vary building heights and density.	Recognise First Nations people.			Provide a new cycleway along Streeton Drive and on both sides of Hindmarsh Drive.
	Protect Weston Homestead.			



We have highlighted in the above table the key themes that we believe have a closer relationship to the long term planning considerations to the CZ6 lands in Stirling.

The detailed strategy for the Weston Creek District area commences on page 92 of the draft document and which we have reproduced for reference below.

#### **Key directions for Weston Creek**

The following key directions highlight the vision for Weston Creek as present in the draft District Strategy.

- Enhance priority blue-green connections at the western portion of Rivett and Duffy.
- Prioritise the management of bushfire risks for existing and new development.
- Grow small business and employment opportunities in Weston group centre to enhance and diversify its key economic role for the district.
- Enhance public transport priority connections to the City Centre and to Woden and Molonglo Valley in future.
- Develop more diverse housing in and around the Weston group centre and integrate with rapid public transport corridors.
- Consider the role and function of existing group and local centres which may include the Fisher local centre, and where required undertake targeted initiatives to support centre viability and community development.
- Strengthen the cross-district network of community facilities with consideration of demand and existing provision across Weston Creek, Woden and Molonglo Valley districts.

None of the above key directions relate specifically to the CZ6 zoned lands in Stirling. It seems that the draft District Strategy has not acknowledged what is already known about future long term uses of the facilities and has not considered possible changes or the opportunities that might be available to the area. We this this is an opportunity lost.

### Planning for selected key sites and change areas

The Weston Creek District Strategy Plan (Figure 31 – refer below) highlights the key structural elements and directions for the district based on each of the five big drivers described above.

The draft district strategy plan (as published) aimed to highlight the following elements (for some districts not all elements are relevant or shown in the maps):

- current and possible future blue-green network values and connections.
- current and proposed new transport routes and links, and others for strategic investigation.
- centres and locations requiring a particular focus on economic development and employment.
- group and local centres that are a focus for consideration of planning and non-planning initiatives to support their ongoing viability and role as a community meeting place (centres to be confirmed though further investigation)
- any new or future proposed community and recreational facilities.
- sites and precincts that are identified for future development through existing estate development planning, the Indicative Land Release Program (ILRP) or development proposals and an estimate of the number of dwellings they may deliver.
- future investigation areas that will be considered for additional housing in future versions of the district strategies.





None of the above structural elements and directions for the district consider changes or opportunities possible at Stirling.

We believe that this is an opportunity lost to broaden the long-term planning options applicable to these lands, to enable better utilisation of the limited land available in the locality, to assist existing and future lessee's of both parcels of land to formulate plans of redevelopment that both cater to the community needs and to support the ACT government achieving both theirs and the communities aspirations for the district.

The Weston Creek District Strategy states that a series of initiatives will support delivery of the directions of the Weston Creek District Strategy. The initiatives are related to each of the five big drivers and their associated planning objectives. While some are already planned or underway, others fall into an outlined timeframe that expands from Short term (next 5 years) through to Long term (next 20 years) and beyond.



We would suggest that the government needs to consider that change is going to happen quicker than anticipated and if they fail to act on emerging issues that they are already aware of, they will pass them by.

The District Strategy acknowledged that there is a need for further investigation in responding to future housing and jobs for the district. The potential housing requirement for Weston Creek is for around an additional 1,300 dwellings by 2063. The Strategy clearly identifies that will be infill development as there are no greenfield precincts in the district, yet it does not really make any provisions for that demand to be enabled.

It does identify the proposed, possible and potential future change areas, with acknowledgement that these will not fulfill all of the demand. The Strategy notes that the projected demand will need to be considered in light of updates to population projections. It foreshadows that this will be addressed in future versions of the district strategies, however we believe that the time is now.

## **Weston Creek District Policy**

## 1.3 Policy outcomes

Development proposals in Weston Creek District will be assessed having regard to the key characteristics of the district and the policy outcomes to be achieved for the district. The policy outcomes to be achieved for Weston Creek District are derived from Weston Creek District Strategy. The Weston Creek District Strategy sets the vision, priorities and values of the district.

The desired policy outcomes to be achieved for Weston Creek District follow three themes (community, landscape and amenity):

#### Community:

The Weston Creek District has a smaller and older population than other areas of Canberra. The community was significantly impacted by the 2003 fires that destroyed many homes and caused the death of four people. Weston Creek has a large proportion of separate houses and has a lack of alternatives for people to downsize while staying within their communities.

### Policy outcomes:

- 1. Develop more diverse housing in and around the Weston group centre and local centres, integrated with rapid public transport corridors. This should particularly focus on smaller single level dwellings or developments with lifts, which are more suitable for some older people.
- 2. Prioritise the management of bushfire risks for existing and new development.

We believe that the CZ6 zoned lands in Stirling should be added to the list of identified locations where housing diversity can be delivered to meet the needs of the community.

#### Landscape:

The dominant landscape feature—the Stromlo Pine forests—was destroyed in 2003, leading to the development of Molonglo. However, the district retains strong connections to surrounding open space, including Mount Arawang and the Cooleman Ridge to the south and the grassland to the west.

#### Policy outcomes:

- 3. Maintain the open space separation between the Tuggeranong and Weston Creek districts. Similarly, the open space separating Weston Creek and Molonglo should be largely retained.
- 4. Enhance priority blue-green connections at the western edge of Rivett and Duffy.
- 5. Strengthen street tree planting, particularly in the Weston Creek group centre area.



### Amenity:

Being smaller and lacking the facilities of a town centre, Weston Creek has a close relationship with Woden Valley and, increasingly, with Molonglo Valley. The heart of Weston Creek is the Weston Creek group centre (Cooleman Court). Opportunities to strengthen the amenity and community facilities within this centre should be taken.

#### Policy outcomes:

- 6. Revitalise local centres in Weston Creek, particularly Fisher.
- 7. Grow small business enterprise and employment opportunities in Weston Creek group centre.
- 8. Strengthen the cross-district network of community facilities with consideration of demand and existing provision across Weston Creek, Woden and Molonglo districts
- 9. Enhance public transport priority connections to Civic and Woden and, in future, Molonglo.

We believe that with proper planning and added flexibility of land uses, the CZ6 lands at Stirling can play a role in meeting the needs of the district.

## The future of facilities at Stirling.

A comprehensive body of work completed in 2021, as commissioned by ACT Sports and Recreation, aimed to review the current provision of Lawn Bowls facilities in the ACT.

The objective of the report, the Strategic Facility Review of Bowls in the ACT – released in June 2021, and completed by RSM, aimed to provide operational insights of the ACT clubs and lawn bowls facilities.

A key message from the report is that Lawns Bowls as a sport is currently dwindling in the ACT and that the financial viability of many of the facilities is under threat, without supportive action.

In conjunction with this, existing revenue streams for many of the operations are under threat with an expectation from not only communities but governments alike, for operators to extract themselves from a reliance on monies from Electronic Gaming Machines. This is not necessarily a bad thing but ultimately facilities will either merge, consolidate, have to find alternative streams of revenue or disappear.

The report made a number of recommendations summarised as follows;

- increase membership and participation rates.
- restructure and diversify club business models away from traditional club revenues.
- assess feasibility to establish two indoor facilities (north and south) to support market consolidation or growth
- independent and smaller clubs require financial and material support to develop assets and facilities.
- Clubs must support Bowls ACT to rebuild its revenue base through growing memberships across the ACT.

This is where we believe that proper future planning must be considering how many of the older well established suburbs, and the infrastructure therein, have evolved and / or are changing, and to provide the necessary pathways for change to occur.

Through the mechanisms of the District Strategies the ACT government can provide the opportunities for facilities to look at diversifying business models, whilst taking steps to meet the community and ACT government objectives, such as housing diversification and downsizing opportunities for the local populus.

The RMS report does suggest that smaller independent facilities will require both financial and material support but cannot rely on either government or sporting bodies grants that are sporadic and minimal and a further burden to the community.

When land use planning allows flexibility in uses, whilst adhering to the wants and needs of the community, facilities can reinvent themselves to recreate financial viability and independence.



## Our response to the Draft District Strategy.

It seems from reading the draft District Strategy and Policy documents that the ACT government believe that this area of the south western suburb of the ACT is set in stone and does not require any rethinking. The draft documents are all but silent on the location.

This ignores the ACT governments own evidence that not only CZ6 – Leisure and accommodation areas in the ACT are undergoing a significant rethink and revitalisation as far as planning goes, but Lawn Bowls facilities in the ACT are in danger of disappearing from the landscape unless, they are able to come up with innovative business models, and redevelopment opportunities to survive the next phase of Canberra's growth.

It is also clear that this particular location of the ACT has more CZ6 land and facilities than necessary, as a significant portion of CZ6 zone land, being Block 92 of Section 24, remains vacant undeveloped land despite the suburb having been established for many years.

The District Strategy clearly articulates that the location is "well serviced", so it can be assumed that there is not unanswered demand and in fact an oversupply of CZ6 zoned land possibly exists. It is known by government that the facilities already in place are struggling to come up with viable answers for financial stability under the existing planning framework.

A large portion of the undeveloped, or under-developed areas of CZ6 lands in the ACT are being revitalised by permitting residential uses thereon through Precinct Codes (under the current Territory Plan).

The Planning Authority is clearly comfortable with the ability of proper planning controls to both maintain the ability of development to deliver on the objectives of the CZ6 – Leisure and Accommodation Zones whilst allowing residential uses as a merit track permitted use.

We believe that these same adopted principles can be applied to the CZ6 zoned lands in Stirling with consideration given to permitting a similar residential use on these lands.

With careful and full consideration of the location, the local community needs, and surrounding land uses, a proposal that gives facilities the ability to secure financial means to maintain, redevelop as necessary and continue to grow the community facilities seems to be an unanswered need.

Yours faithfully,

Knight Frank Town Planning