



2nd March 2023

EPSDD
Territory Plan Submissions

Submission on Draft Belconnen District Strategy and Draft Territory Plan

Dear Planning Reform team,

Introduction

We are writing to you on behalf of Scentre Group, the owners of Westfield Belconnen. Westfield Belconnen is located on Block 35, Section 52 and consists of 11.7 hectares of CZ1 Commercial Core zoned land within the Belconnen Town Centre.

Westfield Belconnen contains over 250 retailers, 100,000 square metres of lettable area, hosts over 9.5 million customer visits each year and has annual retail sales in the order of \$576 million.

This letter provides a submission on the draft Belconnen District Strategy and the draft Territory Plan as it relates to Scentre Group's Block in Belconnen.

Scentre Group are seeking to reinvest in their property, which provides the commercial core of the town centre and have just submitted a draft planning report to support a proposed Territory Plan variation to increase the building height on this block.

Scentre Group support the development of an updated outcomes focussed planning system that encourages improved spatial and built outcomes across the Territory and are pleased to see that the initiatives proposed in the District Strategy complement their aspirations for the future of Westfield Belconnen.



Figure 1: Westfield Belconnen, location within the town centre. (ACTMAPi)

Summary

Scentre Group supports the work that the ACT Government have undertaken to review the planning system with the aim to simplify it, improve the balance between certainty and flexibility and incorporate character, context and design as key elements of the system, detailed strategic planning for each district and an outcomes focussed Territory Plan.

Scentre Group welcomes the opportunity that their site in Belconnen can contribute to the growth and vitality of Belconnen and support the big drivers for the district planning which will help Canberra to grow as a resilient, sustainable and compact city.

While the District Strategy supports Scentre Groups' aspirations, the draft Territory Plan, does not, as it continues to mandate a 4 storey height limit over this key site in the Belconnen Town Centre. We consider that an outcomes focussed Territory Plan should remove these mandatory limits from the town centres, with development proposals to be assessed on their achievement against the new outcomes and design guidance.

Belconnen District Strategy

It is understood that the district strategies are intended to be dynamic documents that evolve and put the directions from the ACT Planning Strategy into a more localised context. The role of the district strategies is stated as:

- Setting a future direction for each of Canberra's districts
- Provide a guide for implementing the ACT Planning Strategy at a district level, including guidance on desirable areas of growth and change based on accessibility to services, transport and amenities to inform the district policies under the new Territory Plan.
- Informing the provision of infrastructure, community needs assessments, and assessment of major development and rezoning proposals and more detailed precinct and site planning
- assisting in achieving coordination between infrastructure, transport, planning, climate change and living infrastructure strategies and delivery of initiatives at a district level.

Some of the key directions include:


- Strengthen the economic and employment role of the Belconnen town centre and Kippax group centre.
- Connect Belconnen town centre into the light rail network.
- Develop Belconnen town centre as a commercial and mixed-use hub integrated with development in surrounding suburbs.
- Catalyse sustainable urban development based on the rapid transit corridors and future light rail.

We support these directions and the associated initiatives for Belconnen identified under each of the five drivers.

As Block 35, Section 52 is at the heart the commercial core of Belconnen, it has a great opportunity to contribute to the objectives and initiatives of the Belconnen District strategy under the various drivers. However, with over 9.5 million visitors per year, it would be reasonable to identify Westfield Belconnen as a destination in Figure 25.

The Westfield site is identified as one of the key sites/possible change areas with a number of principles to be applied for to future planning and development. Scentre Group have prepared a Masterplan and planning report for the site which responds to these principles and the initiatives in the strategy by:

- Providing a landscaped connection between Lathlain Street and Benjamin Way with connections to Emu Bank. New connections between the north and south of the site would also be developed.
- New public frontages and connections.
- Improved contribution to green spaces and canopy cover with outdoor places for people to enjoy.
- New opportunities for active uses at ground level.
- Provide connections between indoors and outdoors and generate active public spaces for eating and recreating.
- Improved connections to the active travel network to public transport and future light rail
- Providing a mixed use centre that supports local liveability
- Increased employment opportunities

A link to the Masterplan and Planning Report can be found here  [Planning Report - B35 S52 Belconnen Westfield.pdf](#).

The site is identified in the strategy as highly suitable for new housing as it is within an existing centre close to services and public transport.

Scentre Group's aspiration is to create a mixed-use commercial precinct which reinforces the Westfield Belconnen site as the commercial and retail core. It proposes redevelopment of the Belconnen Westfield Precinct over 5 stages to rehabilitate the existing urban structure to deliver density, activation and amenity to the core of the Belconnen Town Centre.

As the Masterplan for the site closely aligns and complements the District Strategy we anticipate support for the proposed plan variation to realise these aspirations.

However, the colour of Block 35 Section 52 in Figure 36 in the Belconnen District Strategy is ambiguous. This site, which is the largest block zoned CZ1 and the retail and commercial core of the town centre, should be "Urban Core" and identified in bright red in Figure 36. Figure 46 describes the Urban character types and correlates them with current ACT zones, "Urban Core" is correlated with CZ1 and RZ5 and the urban design principles are for a high density built context with high rise buildings greater than 6 storey consisting of mixed-use with provision of entertainment, civic and cultural uses. As the urban core area, it should be characterised by the highest density and height with the greatest variety of uses.

We note that to implement the initiatives in the Belconnen District Strategy, there is a requirement for timely delivery of upgrades to utilities and infrastructure by the ACT Government to support future growth and development.

Draft Territory Plan

While the district strategies are one part of the process to review and reform the ACT Planning System, these sit alongside the new Territory Plan. It is understood that the district strategies have informed and will continue to inform the district policies in new Territory Plan by identifying areas of potential future land use change and providing guidance on the expected character of development in those areas.

Belconnen District Policy

Building Heights

The Belconnen District Policy describes the policy outcomes for Belconnen District and development proposals will be assessed against this policy. The policy includes assessment requirements which are the mandatory development controls for specific sites within the District. Two mandatory assessment requirements apply to the site:

1. Maximum building height is indicated on Figure 1.

This applies a mandatory 16m or 4 storey height limit to the Block.

2. Required active frontages, sites required to provide publicly accessible carparking and permitted supermarkets as indicated on Figure 2.

There are identified primary active frontages which apply to the site along Benjamin Way and Lathlain Street.

As the focus of the new Territory Plan is to provide an outcomes focus, we suggest that the height limits should be removed for the town centre as this is the appropriate place for high density development. The key directions for the Belconnen District Strategy reinforce this; they are to strengthen the economic and employment role of the Belconnen Town Centre and develop it as a commercial and mixed-use hub integrated with development in surrounding suburbs. Removing the height limit would provide much more flexibility and opportunity for development within the town centres; and restore the opportunities that were afforded prior to the implementation of Variation 342, which set the current height limits (prior to this there was no maximum height limit). Development would then need to be assessed on its merit, against its achievement of the planning outcomes and requirements of the Belconnen District Policy and the Commercial Zones Policy.

The Belconnen District Policy provides a range of outcomes that development in the town centre must respond to, these include that larger buildings demonstrate a high level of architectural merit, and demonstration that building heights are appropriate and contribute to a safe and interesting streetscape.

As the draft District Strategy correlates CZ1 with the “Urban core” when describing the Urban character types, it follows that a 4 storey height limit is inappropriate for the urban core where the urban design principles are for a high density built context with high rise buildings greater than 6 storey consisting of mixed-use with provision of entertainment, civic and cultural uses.

On this basis, this site in the CZ1 Core area of the Belconnen Town centre should not have a maximum height limit of 4 storeys. This is contrary to the strategic planning and desire to concentrate growth and development in town centres, and results in a poor planning outcome for the site and the town centre.

It is also inconsistent with the scale and height permitted on surrounding blocks which are up to 25 storeys. As follows:

- Block 37 –25 storeys or 81m (CZ1)
- Block 34 –18 storeys or 59m (CZ1)
- Block 38 –6 storeys or 22m (CZ1)
- Block 2 Section 23 – 18 storeys or 60m (CZ2)
- Block 1 section 21 – 12 storeys or 42m (CZ2)

There is an expectation, that as the retail and commercial core of the town centre, the site should be afforded opportunity for taller development. Scentre Group have also prepared a draft planning report that supports a proposed variation to increase the height limit for the site to 30 storeys.

Lathlain and Circus Precincts

Figure 3 in the Belconnen District Policy relates to the Lathlain Street Precinct. This figure is read in association with the maximum building height table under Figure 1. In reading these two figures, it appears to indicate an increase in building heights across the Lathlain Street Precinct.

In the current Territory Plan in these precincts the heights for the areas are:

- for area 'd': the lesser of 18 storeys and 60m
- for area 'e': the lesser of 12 storeys and 42m
- for area 'i': the lesser of 4 storeys and 16m

In the new draft the numbering has changed, so the equivalent areas and heights are different. The draft Belconnen District Policy shows the following (which would be an increase for these areas):

- Area d - 66m 20 storeys
- Area e - 59m and 18 storeys
- Area i - 22m and 6 storeys

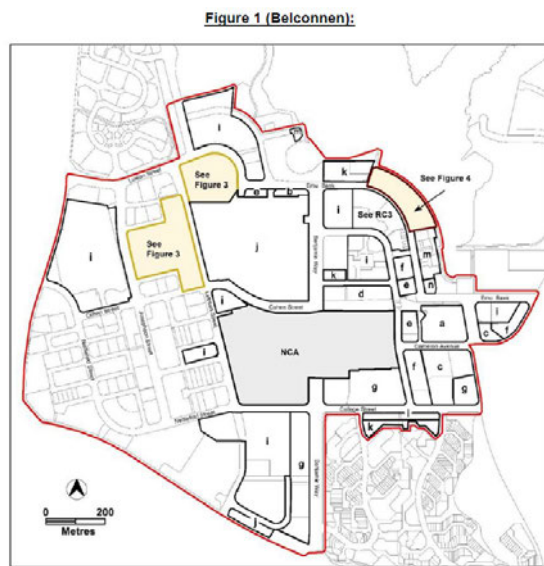


Figure 1 Belconnen: Maximum building heights

Maximum Building Heights

Key	Metre limit	Approx. storeys	Key	Metre limit	Approx. storeys
a	90 m	28	h	28 m	8
b	81 m	25	i	22 m	6
c	75 m	23	j	16m	4
d	66 m	20	k	13m	3
e	59 m	18	m	10m	2
f	41 m	12	n	6m	1
g	35 m	10	NCA	RL 613.7m	6 - 9



Figure 3 Belconnen: Building Heights and other requirements to Lathlain Street

Figure 2: Figures 1 and 3 from the draft Territory Plan Belconnen District Policy

While we have already argued that the height limits in the town centre should be removed, a proposed increase for sites surrounding Westfield Belconnen would further justify the need to increase the height limit on the Westfield site. But perhaps this is an error in the drafting of the new Territory Plan.

Closing

Thank you for this opportunity to comment on the new planning system we look forward to reviewing the design guides and other components of the new system in the coming months to further understand the implications and intentions of the new system to achieve the desired improved outcomes.

Sincerely

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Environmental and Town Planner