

17 January 2023

ACT Planning System Review and Reform Project

Draft District Strategies

Draft Inner South District Strategy

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

Dear Sir/Madam,

RE: Draft Inner South District Strategy – Section 19 Forrest.

Knight Frank Town Planning has been engaged to collate and prepare a submission in relation to the Draft Inner South District Strategy 2022 and to address in particular the key principals as outlined for Section 19 Forrest which has been identified within the Draft Strategy as a selected key site and change area.

The aims and role of the District Strategy.

The aims of the Draft Inner South 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."

This statement appears to be a fair and reasonable basis upon which to frame our responses, which also draw on other parts of the Draft District Strategy.

Detailed strategies for Section 19 are contained on page 118 of the document and is reproduced for reference in its entirety overleaf:



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Planning for selected key sites and change areas

The district strategy plan identifies proposed, possible and potential key sites and change areas which may be suitable for a range of residential and non-residential uses (including consideration of education, health and recreation facilities). Key principles to guide future planning for a selection of these sites are provided below. This is conceptual only at this stage and put forward as early ideas for discussion. The planning for these sites is subject to further investigations and consultation.

Section 19 Forrest

This section in Forrest has a range of zones, including PRZ2 (Restricted Access Recreation), RZ1 (Suburban), RZ2 (Suburban Core), CFZ (Community Facilities) and CZ6 (Leisure and Accommodation). This supports a diverse range of uses including the Canberra Bowling Club, Forrest Tennis Club, Free Serbian Orthodox Church, Forrest Hotel, apartment buildings and the site of the former Italo-Australian Club. Blocks 5, 6, 9, 11 and 12 are zoned as either RZ1 or CZ6 and have potential to be rezoned to CZ5 Mixed Use, which could support uses including residential.

Key principles for development of these blocks include the following:

1. Provide a publicly accessible pedestrian path between Dominion Circuit and National Circuit.
2. Access to the blocks is by the existing driveways. Avoid access from Dominion Circuit to Block 9 to reduce impact on the houses opposite.
3. Provide suitable landscaping to the Dominion Circuit frontage to reflect the residential character opposite.
4. Consider noise and overlooking impacts of the adjoining tennis courts and church. These uses may extend after hours and must not be compromised by any future redevelopment of these blocks.

Figure 38: Principles for Section 19 Forrest



Figure 38 (above) has been modified in this response to show block numbers (in red) for easier reference and understanding of this response.

Our response to the Draft District Strategy.

Firstly, it is noted that the Key principles are put forward to guide future planning and that they are conceptual only at this stage, put forward as early ideas for discussion. We note that there are numerous inaccuracies in the conceptual presentation, particularly in relation to existing driveway crossovers. For example, not all existing crossovers to Block 6 are shown and no driveway entry to Block 12 is shown at all. The inclusion of all driveway crossovers is important for CZ5 zoning to give planners and designers the best chance to design for all vehicles to enter and exit the site in a forward direction, for pedestrian safety above all other factors.

We request these inaccuracies be noted and corrected in future Strategic Plans and any inclusions in The Territory Plan.

Secondly it is noted that Section 19 Forrest has rightly been described as an area with a range of zones, that supports a diverse mix of uses including the Canberra Bowling Club, Forrest Tennis Club, Free Serbian Orthodox Church, Forrest Hotel, apartment buildings and the site of the former Italo-Australian Club. This also means that there is a diverse range of land ownership, and to presume that development might occur in a manner that is freely or easily controllable does not acknowledge this. This will be discussed in more detail later in this submission, particularly in relation to principle #1.

It is proposed within the Draft Strategy that the currently zoned RZ1 and CZ6 blocks could be rezoned to a CZ5 Mixed Use zoning. Given the location and mix of surrounding uses it would seem that the proposed CZ5 Mixed Use zone would be an ideal fit, and far more appropriate to both the existing and possible future uses of the land and seems to be very sensible planning. The current situation with a single section of development containing a total of five (5) different land use zones, although manageable with proper planning, may seem ad hoc and has the potential to invite conflict between users when this is not necessary. The CZ5 Mixed Use zone would allow current uses to remain for the term of their natural life whilst applying a zone that would more appropriately address the desired long-term character of the locality.

The Draft District Strategy also identifies four (4) key principles for future development of the blocks.

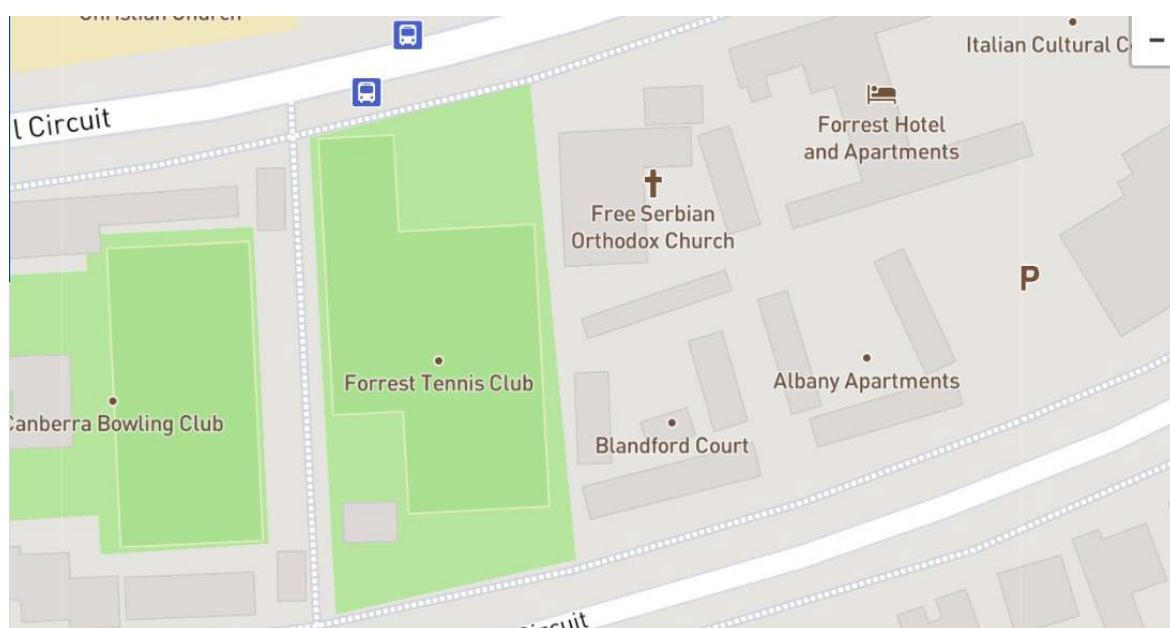
Principle 1.

The first of these is for the provision of a publicly accessible pedestrian path between Dominion Circuit and National Circuit. We refer to Figure 38 (above) from page 118 of the Draft Strategy. A possible linkage (labelled 1) is shown traversing the section, along the western boundary of Block 11 and continuing through the middle of Block 6.

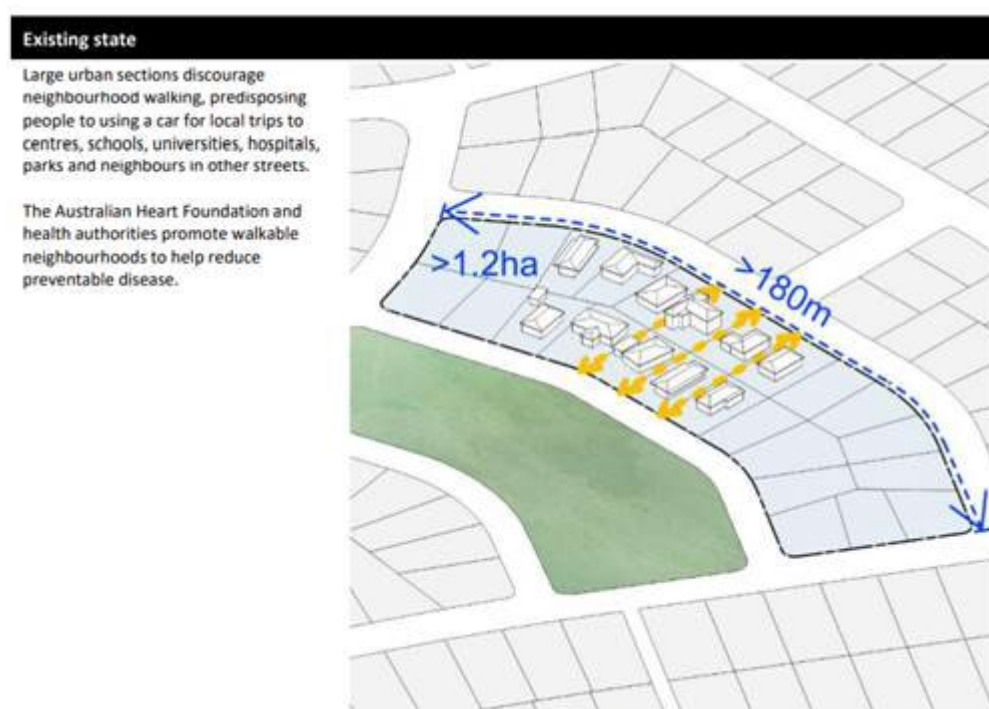
We suggest that this link, as proposed by Principle 1 of the District Strategy, would serve very few people in relation to Section 19 and people living in the surrounding sections. This is based on destination potential, now and into the future, both north and south of Section 19.

For example, north of Section 19 is the school and oval, plus the Jewish cultural centre. South of Section 19 is the Manuka shops. There is also the green space of Manuka Oval, the linear Telopea Park and Arthur Circle. We suggest that the existing network of pedestrian pathways is very suitable and that the current neighbourhood does not require additional links to support an increased population.

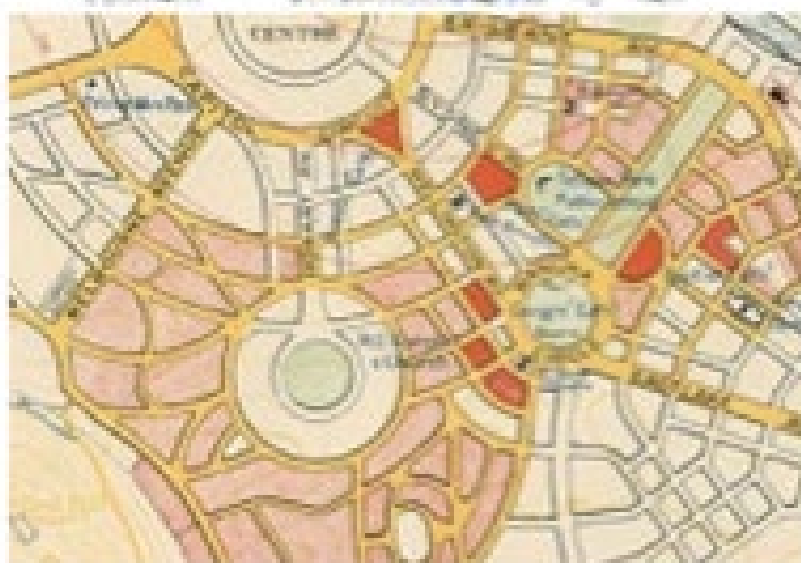
There is an existing walkway leading to the local school and two bus stops as shown in the Action bus map extract below. The publicly available pathway linkage connects National Circuit and Dominion Circuit (described as Block 10 Section 19) that lies between the Canberra Bowling Club and Forrest Tennis Club. This land is under the custodianship of City Presentation.



The distance between this existing walkway and Franklin Street to the east is 272 metres which exceeds the 180m desired by the strategy (as per the figure below and from page 140), however the proposed additional pedestrian connection does not connect to any existing transverse streets as shown in the Strategy illustration. Whereas the existing pathway connects pedestrians from Dominion Circuit and Arthur Circle to the school, the bus stops and the open oval opposite. We propose that Walter Burley Griffin got it right in their progressive refinements of their Canberra plan, and that the existing street and pathway arrangements around Section 19 neither discourage people from neighbourhood walking and offers sufficient useful connections to the public transport network.



We note that the 1913 Griffin plan extended Bougainville Street through to Dominion Circuit but by the 1927 version it was truncated to stop at Empire Circuit and straightened to lead straight to the Manuka shops. (refer to the figure below – following page)

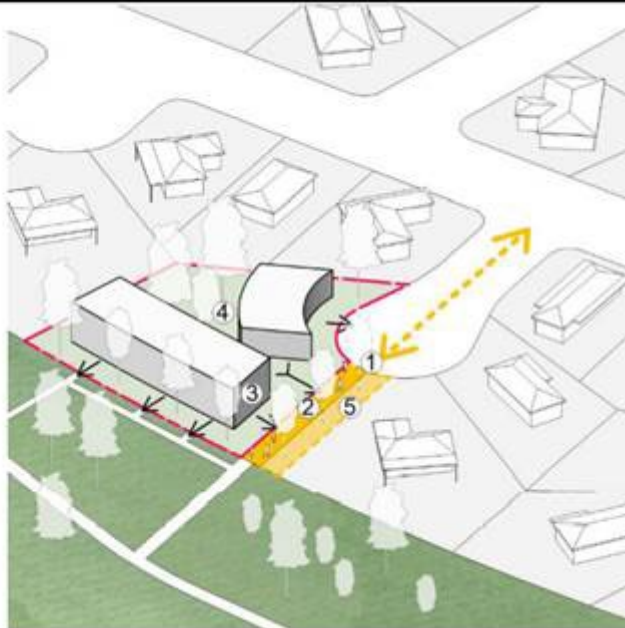


Comparison of the 1913, current and 1927 Griffin plans.

In light of the mooted CZ5 designation for Section 19 and increased population supported by that change, we consider a better response would be to not subsume parts of Blocks 6 and 11 in Section 19 to a new pathway connection, but rather to give them more direct access to the Manuka shops by affording a pedestrian connection through Section 20. We refer to the below figure from page 140 of the District Strategy which suggests urban improvement by adding pedestrian connections to link to existing streets. This suggested new link through Section 20 would allow the original Burley Griffin plan to better serve this growing city. Or perhaps it is better to leave the status quo in relation to pedestrian walkways and roads.

'Urban improvement' approach

1. Make a new link close to an existing street:
 - 3m wide for a section with public frontage up to 15m wide.
 - 4.5m wide for a block with public frontage greater than 15m wide.
2. Provide a new footpath and dedicate the new link as public land.
3. Provide built address to public frontages with a range of building heights and up to 6 storeys on park frontages.
4. Consolidate deep soil landscapes in the centre of the urban block and along public frontages.
5. Redevelop on the other side of the new link with the same criteria above to complete a 6m–9m wide link over time; provide tree planting and or swales in the widened link, as appropriate, and expand the public dedication of the link.



We note that the mooted CZ5 zoning of Section 19 may increase the number of residents, although it must also be noted that as the motel on Block 11 and the apartments on Blocks 5 and 6 already host a substantial population of people and do not necessarily require redevelopment: Sustainability in the built environment can be achieved in many ways and one of them is to retain existing building stock where it meets current and future needs. We suggest that while rezoning offers attractive potential for development, modern residences tend to be double the size of those built in the 1960s, such as the Albany and Blandford apartments on Blocks 5 and 6, and with current setback and carparking requirements, only a modest increase in actual population carrying capacity may be achieved. To demolish and rebuilt or not, that is a sensible question that the property owners must ask as part of their own return on investment calculations.

Therefore redevelopment may not be necessary to achieve the aims of the Territory Plan, although the opportunity to be able to redevelop as a carefully considered right rather than the current proponent driven request system is a useful tool in the development toolbox for both planners and residents.

We also believe that a pathway on this alignment is not practical in the sense that to achieve a pathway along the indicated alignment would require the development of three separately owned parcels of land to occur in unison which is extremely unlikely. To propose to obtain access to land in an ad hoc manner, for future development of a pathway once all land came under the control of the ACT Government is fraught with risks and may not occur for a very long time as it is predicated on future development occurring. This could result in the government being left with ownership and management of a small dead-end strip of land, bounded by existing properties, for many years, that leads to nowhere, and becomes a burden to the community.

It is also not practical in the sense that, to obtain land for a pathway through Block 6 requires that this parcel be split into two non-contiguous parcels of land which severely affects future development potential.

To try and deliver a pathway that is practical from a land ownership sense would mean to realign the possible link to follow the existing property boundaries which would in affect create a pathway alignment that contains a zig zag bend midpoint creating numerous CPTED (Crime Prevention Through Environmental Design) concerns about safe use of the pathway. A pedestrian link of this configuration would have a high risk of making it unusable and completely ineffective because of surveillance and crime concerns. Producing a mid-section pathway that has no visibility from either roadways and creates blind corners and hiding spots would not comply with the ACT Government's own standards.

Principle 2.

The second key principle of development identified in the Draft Strategy is to provide access to the blocks by way of their existing driveways. A further statement is made to avoid access from Dominion Circuit to Block 9 to reduce impact on the houses opposite.

Whilst the first part of the principle is reasonable, as it maintains and does not remove any existing property rights, it is noted that the diagram within the Draft Strategy does not correctly identify all of the existing driveway access points on all parcels. This should be rectified and clear where all existing access points are so that there is no ambiguity or misreading of the intent of the document when development under the new Territory Plan comes into play.

We also note, that whilst the intent of the second part may initially seem to be a reasonable principle to identify, there is a risk of the principle overruling practicality in the future. It is crystal ball gazing to contemplate or consider what the owners of this land may wish to do in the future, but any proposed access and/or restrictions to access to Block 9 should be left to assessment at the time of any proposal, where an outcomes based approach will consider and determine an outcome based on proposed use, traffic generation, access, serviceability and practicality.

Principle 3.

The third key principle identified in the Draft Strategy is for any development to provide suitable landscaping to the Dominion Circuit frontage to reflect the residential character of the development opposite. We are not aware of any existing or proposed landscaping documentation or guidance in the ACT (or anywhere else for that matter) that distinguishes between a landscape character that is either residential or commercial so query what the principle is attempting to achieve and how such a requirement can be addressed. We also note from the Figure within the Draft Strategy (Figure 38 from the Draft Strategy) that it is intended to apply to landscape within the block, and therefore does not consider the verge landscaping and how, if these may differ in character – if that where possible.

We would also argue that there is already adequate control on new development landscaping within the Territory Plan codes as they exist, with proposed on block and verge landscaping required to be submitted for approval as part of the usual DA process.

There would be far too many examples to list, of very poor residential streetscape or block front planting (landscaping and/or poor maintenance). Similarly, it would not be too difficult to identify a large number of commercial properties would have well designed and implemented block front and verge (streetscape) planting and maintenance programs that would pale residential areas into insignificance.

The principle seems to be based on a reliance of the position that residential landscaping is superior to that on commercial properties. We would not agree.

Principle 4.

The fourth key principle identified is for development to consider noise and overlooking impacts to the adjoining tennis courts and church. We do not believe there are any major issues with this ideal however would suggest that the church and tennis courts should also have similar requirements to consider their neighbours when contemplating any new development. It would only seem more than reasonable for neighbouring properties of different zones and uses should need to consider each other.

Yours faithfully,


Knight Frank Town Planning
