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3 March 2023

The Officer Tasked
ACT Planning System Review and Reform Project
Environment, Planning and Sustainable Development Directorate
Dame Pattie Menzies Building
DICKSON ACT 2602
Via online lodgement portal

Dear Officer,

RE: Response to submission of representation and feedback on the draft new Territory Plan and draft district strategies: ACT Planning System Review and Reform Project:

#### Overview

We are writing to you in relation to Block 92 Section 24 Stirling that is a block of unleased Territory land that is undeveloped at present and is available for development to meet the objectives and needs of the Weston Creek community into the future, but is not identified in the District Plan as a development site; in fact the whole precinct around the Stirling District Playing fields include clear opportunities for redevelopment and further development to increase, diversify and intensify use offerings and housing choice opportunities to the community.

### **Block 92 Section 24 Stirling**

Block 92 Section 24 Stirling (6 Teesdale Place) is located opposite and to the east of the District playing fields and to the north of the Canberra Labor Club in Weston, to the south of the Warrigal Stirling Residential Care Home and is subject to the 'CZ6 – Leisure and Accommodation' zoning of the current Territory Plan.

The site has a history of interest for the development of the vacant site, been the subject to numerous investigations and Direct Sale applications, a Government Market Sounding exercise, yet remains undeveloped and not even listed on the Land Release Program – it appears to be a development opportunity that is not well understood or considered at this time yet it clearly has great potential to meet the challenges outlined in the District Strategies for the future Canberra city. After the levels of intent over the years from my experience it seems strange that this Block is not yet developed to the benefit of the Canberra community – but it may be a blessing in disguise as explained below.

The unique opportunity of the site revolves around its co-location with the current uses in the immediate precinct, the unique setting with general separation from residential neighbors and large vegetation/tree buffers protection both visual and other amenity of sensitive uses. The quantum of existing recreation and retirement living uses coupled with the adjoining district playing fields represents a unique opportunity to create an integrated mixed use precinct that utilise both CZ6 and living opportunities in a manner that integrates with the area while not adversely impacting on the existing residential character to the east and south.



Figure 1: Location for Block 92 Section 24 Stirling

Uses may include a range of consideration including all of the future CZ6 zoning accessible uses (either by themselves or in an allied and integrated hub. There is also the opportunity to consider the creation of some scale to the site given its setting and separation from other surrounding (sensitive) uses. Factors that favour the site for future development as a residential or commercial accommodation type developments include:

- The general lack of land available or proposed for release for development of these uses across the ACT in the context of a lack of housing choices in Weston Creek and rental stress levels experienced at present
- The site's location amongst public open space and stands of mature trees provides a natural buffer between surrounding residential areas and preserves amenity interfaces that would assist to mitigate development impacts of a more intense development scale from the surrounding low scale residential suburbs.
- The elongated east/west site geometry presents an opportunity to design an efficient passive solar orientated residential development of the scale envisioned; which is a unique opportunity.
- Supporting key Government policies relating to housing choice, infill development and sustainable and resilient neighbourhood development as accentuated in the District Strategies.
- Sustainable use of valuable land assets that are previously undeveloped and are well placed in close proximity to the Group Centre as well as other recreation and sporting facilities immediately adjacent, and
- Makes good use of the site characteristics and opportunities on-site.



# The ACT Planning System Review and Reform Project: A Strategic Direction for additional Retirement and Aged Care facilities.

The ACT Planning System Review and Reform Project documents provides insight into the key urban planning and development context and the ACT Government and community's vision for the future development of the District over the next circa 25 YEARS (2046) and further into the future (to 2063). In considering the key draft reform documents listed below, there are some trends that stand out and are worth considering. We refer specifically to the following documents:

- The draft Weston Creek District Strategy,
- The draft Territory Plan: Weston Creek District Policy,
- The draft Territory Plan: Commercial Zones Policy.

Below we have outlined some of the important findings and key policy considerations included in these draft reports that are of interest to this site:

### The Draft Territory Plan Zone and District Policy

The draft Territory Plan is proposing new planning policy documents to be used in informing and controlling the development of land and future development context and outcomes on land.

Block 92 remains zoned CZ6 - Leisure and Accommodation Zone in the Draft Territory Plan. Neither the Commercial Zones Policy nor the Weston Creek District Policy include any specific requirements for the site and/or precinct.

The Zone Policy set a range of uses that are permissible on CZ6 zoned land and we note the change in uses and definitions. This includes adding care takers residence and guesthouse as permissible uses while altering/changing or deleting uses like childcare use, now becoming early childhood education, serviced apartment use cease to exist as a use term and changes to community uses, supermarket and personal services are noted.

The general and zone-specific objectives for the applicable zoning call for development being primarily commercial in nature with a strong economic focus on the zone and land supply for commercial services. The scale of development should respond to the zone hierarchy. Protection for leisure and accommodation zone uses from higher order commercial uses are important to enhance the region's economic and employment diversity. Leisure and accommodation facilities are to be sited in places with convenient access to public transport and of a bulk scale and design (including landscaping) that is compatible with the environmental values of place and protect the amenity of nearby residential areas. Street frontage activity and surveillance of the public realm are key objectives of use and development.

The limitations set out in the assessment requirements for CZ6 zones is specified to limitations of the size and type of retail tenancies (max. 250sqm for a retail use). Assessment outcomes include consideration of policy outcomes, consideration of applicable design guides, functionality and usability of a site and development for its intended purpose/use, applicable environmental effects, a range of design specific considerations and the like.

The district Policy states that:



Development proposals in Weston Creek District will be assessed <u>having regard to the key</u>
<u>characteristics of the district and the policy outcomes to be achieved for the district</u>. The <u>policy</u>
<u>outcomes to be achieved for Weston Creek District</u> are derived from <u>Weston Creek District Strategy</u>.

The Weston Creek District Strategy sets the vision, priorities and values of the district.

Policy outcomes further include a requirement that developments of more diverse housing choices integrated with public transport should be considered and development proposals will be assessed against a broad range of design and economic related criteria.

We note that the current prescriptive planning provisions in the CZ6 zone appear to be moved to the Technical Specification ts2: Commercial document. It is our understanding that this document will need to be considered as per the requirements of the District and Zone policy, but the actual provisions included are not part of the planning controls available at the site. The specifications may be used to inform the assessment and outcome requirements of the Territory Plan Policies but where a proponent can demonstrate that the policy required, and objectives have been met the Authority have discretion to approve an alternative outcome.

We can not see any reason why the site would not be able to accommodate a substantial development proposition that can deliver commercial, recreation and leisure and accommodation/residential offerings to the Weston Creek Community.

## The Weston Creek District Strategy

The Weston Creek Strategy is a new planning document that is included in the 2023/4 Planning Reform project. The strategies are to inform and focus a modern planning system on the vision for delivery of a livable and sustainable, growing and changing Canberra. With more people living and working in the ACT, the Government has identified a need for a progressive planning system that will facilitate the growth without compromising the characteristics and values of the city.

The Weston Creek District Strategy is one of nine District Strategies that seeks to bridge the gap between city wide strategic planning and the local area planning captured in the Territory Plan. The District Strategies are intended to provide a line-of-sight between metropolitan level planning, policies and legislation and on-the-ground outcomes that can and should be delivered in the Weston Creek area including guiding desirable areas for development and growth, change in character, services, amenities, and the like.

The Strategy will inform the provision of infrastructure, community needs and the assessment of major development and rezoning proposals and provide more detailed precinct and site planning and aims to achieve better coordination between infrastructure, transport, planning, climate change and living infrastructure strategies and delivery of initiatives.

District strategies are to ...inform the preparation of the district policies in identifying areas of potential future land use change and providing guidance on the expected character of development in those areas. District Strategies are to be living documents that are regularly updated and are to reflect "... new ideas, projects, strategies or policies adopted by the Government, and updated Census data, population and employment projections."

It is worth noting that the District Strategies contemplate the current district context against two timeline horizons; 2046 (~25 year horizon) and 2063 (when Canberra is forecasted to need ~100,000 new dwellings).



The Strategy states that the recent ACT Treasury population projections (prepared in 2022 based on 2016 Census data) suggest that 100,000 additional dwellings in the ACT will be required through to around 2063 based on a substantial increase in population.

Weston Creek is one of the smaller districts (by population) with a 2021 resident total of circa 25,000 persons. Over 80% of the housing stock is represented by stand-alone single houses (80%) while only 4% of housing stock are apartment typologies – this is the highest portion for a single dwelling type in any Canberra District. About 30% of households in Canberra rent their accommodation and in Weston Creek about 23% of rental households are in rental stress. There is clearly a very limited opportunity available to persons living in Weston Creek to make choices relating to typologies other than a single dwelling; dwelling types that presents more affordable housing choices than living in a single dwelling house.

The Strategy forecasts a requirement to generate 800 new homes by 2046 and a further 1,300 homes by 2063 in the District to meet future population demand and note that the majority (over 90%) of these are expected to be medium density in nature.

The district represents an established part of Canberra with infrastructure and centres in operation for many years. The core of economic activity in the district is situated at Cooleman Court and houses the majority of the circa 4,200 jobs, most being Health and Education (38%), Population Serving (32%) and Knowledge Intensive (27%) in nature. The increased population is expected to generate circa 800 new jobs by 2046 and an additional 1,400 new jobs expected by 2063, by far most to be expected in the Health and Education sphere.

The key focus of future development opportunity appears to be limited to a "development arch" starting at the Holder Local Shops, connecting with the Cooleman Court precinct and Warramanga Shops down to the Fisher Shops. There appears to be little thought given to the opportunity that the District Playing Fields and the Stirling CZ6 precinct brings to the District, especially given its strategic location only 800m south of Cooleman Court.

The subject site represents one of the best development opportunities in close proximity to the economic core of the District yet it appears to be overlooked and should be identified as a change area and an opportunity for redevelopment that will assist in providing the services, housing opportunity, housing choice and affordability needs outlined in the District Strategy for the 2046 community.



We request that EPDD effect changes to the District Plan to recognize block 92 as a development opportunity and the Stirling District Playing Fields with the current leisure and retirement living/care and education use concentration as a change area and a precinct that can be investigated for future use diversification and intensification.

We further request that the site is ear-marked for a future land release for the potential development of the site to assist in meeting the housing and other services and leisure activity needs.

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We are available at any time to meet with you or the authority to discuss any matter relating to this submission as may be required. Should you have any further queries, please do not hesitate to contact

Kind Regards