

# Draft Variation to the Territory Plan No 308

Cooyong Street Urban Renewal Precinct

Submission by  
North Canberra Community Council Inc. (NCCC)  
February 2012

## 2.3.1 Proposed changes to Territory Plan map

### NCCC Recommendations:

- 1) At Braddon section 57, CFZ community facility zone becomes RZ5 high density residential zone.
- 2) At Braddon section 52, RZ4 medium density residential zone becomes RZ5 high density residential zone.
- 3) At Reid section 7, RZ4 medium density residential zone becomes RZ5 high density residential zone.
- 4) Remove R13 at a) for land zoned CZ5 mixed use in the Cooyong Street Urban Renewal Precinct Code
- 5) Substitute R13 at b) with R25 and C25 of Part A(5) – RZ5 – High Density Residential Zone of the Multi Unit Housing Development Code
- 6) Remove from the Precinct Code any provisions that permit buildings to be higher than is provided for by their zoning or set back less than their zoning
- 7) Review all elements of the Precinct Code with regard to proposed zoning changes

### Reasons for recommended change of zoning:

Residents do not support CZ5 commercial mixed use zoning on these sections of land. Civic is well supplied, if not oversupplied, with commercial buildings. Adjacent to these sections are the Canberra Centre, and two new mixed use commercial tower proposals on Section 96, Civic on the other side of Cooyong Street opposite section 57. DV308 appears to serve a primary purpose: that of maximizing housing yield and revenue to the ACT Government. DV308 does not meet several key criteria:

- a) Is compatible with existing, or future desired character of, adjacent developments. For this we include the Reid Garden City Heritage Precinct, the Braddon Garden City Heritage Precinct, Gorman House, possible heritage registration of St Patricks Church and the Argyle Apartments. We do not feel that DV308 satisfies this criteria.
- b) Is appropriate to the scale and function of use.

The current function is one for social housing and community facilities. This function should continue to be the core use on these blocks. RZ5 zoning allows for 6 story developments within 50 m of the boundaries of blocks in the RZ1, RZ2 and RZ3 zones and within 40 m of the CFZ zone. This building height would be far more likely to attract broad community support than what is being proposed in DV308.

- c) Is in accordance with the Draft ACT Planning Strategy.
- d) To minimize detrimental impacts including overshadowing and excessive scale.

### Background

The North Canberra Community Council joined residents at consultation meetings on 18 January and 1 and 9 February, and discussed the issues at length our meeting on 15 February following a presentation by Mr Peter Johns of the Community Services Directorate.

The overwhelming majority of residents at those meetings objected to increasing building heights to fifteen stories, especially in Section 7 in Reid, where limited space is available for a progressive step-down between the tallest buildings and adjacent low-rise buildings.

The clear majority of residents objected to the proposed introduction of commercial and retail space into their predominantly residential suburbs, and to the proposal to segregate public housing tenants into a distinct building within the complex rather than to disperse them throughout the complex.

Residents also expressed concern that the proposed developments would add substantially to parking pressures, and that the Kogarah Lane would not adequately deal with the increased traffic demand caused by cars accessing additional underground parking.

### **Precinct Code – Discussion**

#### Roads and Parking

There appears to be only one access and egress road into the proposed developments in Braddon off Currong and Batman Streets. We can't see how this will possibly meet safety regulations. Kogarah Lane in Reid also appears to be the only access and egress road. It is also only 11 metres wide.

The provision for on-street parking seems to be inadequate as on-street parking is already stretched in the neighbourhood and poorly enforced.

## Community Facilities

A good way of preventing any *COMMUNITY USE* and *indoor recreation facility* is to set a minimum requirement for a community organization to operate or sublease 5800 sq m in total. There aren't many groups who would be able to lease this much space in these developments.

## Building Heights

The height of buildings is extravagant by any measure. For example, the height at top of parapet (excluding rooftop plant) is 32 m (approximately 8 stories) on the intersections of Mouatt/Antill and Wakefield/Macarthur in the Northbourne Avenue Precinct Code. DV308 proposes five buildings which exceed this height, including two which would double it.

- Elements at location A in the Precinct Code for DV308 are set for 15 stories high, or a maximum height of 617 RL. These towers are equivalent to what is now being considered on Section 96 in the City commercial core opposite Section 57 Braddon. The zoning contrast between them couldn't be any more distinct. Residents prefer that St Patricks Church be retained and that it receives planning and heritage protection.
- Building elements at location B are set to no higher than 35 metres above datum ground. Even this exceeds the limits set for the tallest buildings in the Northbourne Avenue Precinct Code.
- Buildings at Element C are set at no higher than 28 metres. This exceeds general building heights of 25 metres in the Northbourne Avenue Precinct Code. This is approximately 6 stories. In Bruce, 5 storey buildings may be considered in a CZ5 site specific area.
- Elements D opposite Gorman House are restricted to 16 meters. This is about 4 metres taller than the 3 storey limit set at 12 metres in suburbs 20 metres from Northbourne Avenue in the Northbourne Avenue Precinct Code.
- Curiously, the Precinct Code in DV308 refers to the Multi Unit Housing Development code for building heights, except where stated. In the CZ5 Mixed Use Zone Development Code there is no applicable rule under Element 2.1 Height – General of the code. There are only criteria.

## Population density

Canberrans broadly accept that we will benefit from increasing our population density from its 2009 level of 436 persons per square kilometre (ABS 3218.0) to levels closer to those of cities like Copenhagen (~6,000 persons per square kilometre), London (~5,000) or New York City (~7,000).

North Canberra residents believe that increases in average population density are better achieved by progressive and distributed increases rather than by the creation of discrete, very high density developments.

They do not believe that Canberra will benefit from the DV 308 approach of concentrating population growth into extremely high density developments, located adjacent to relatively low density residential areas.

Braddon and Reid currently have 2,955 and 1,772 persons (respectively) per square kilometre - four to seven times the Canberra average.

The area affected by DV308 currently has 13,000 persons per square kilometre – twice the average of Copenhagen, and thirty times the Canberra average.

The proposed redevelopment would have more than 40,000 persons per square kilometre – seven times the density of Copenhagen, and more than fourteen times that of the adjacent areas of Braddon and Reid.

### Summary

The NCCC does not support DV308. The Precinct Plan does not outline a vision that will be compatible with existing and adjacent developments. Its scale and function of use is not likely to satisfy general community expectation. It is inadequate in describing and predicting several adverse impacts that are likely to occur, such as overshadowing, overlooking, traffic and parking, social outcomes, and loss of general amenity due to the scale of development proposed. The building height limits at elements A and B exceed the tallest limits in the Northbourne Avenue Precinct Code, which is a far more important access route into the heart of Civic. This development if allowed to proceed will set an unwanted precedent. We recommend the NCCC's changes to zoning and the Precinct Code to the ACT Government.

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