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29 November 2019

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Submission in Response to ACT Territory Plan Draft Variation 364 (Gungahlin Town Centre Planning Refresh)

Introduction

The Gungahlin Community Council (GCC) welcomes the opportunity to provide a response to Draft Variation (DV) 364¹ as part of the Gungahlin Town Centre Planning Refresh² (the TC Refresh).

The GCC approached the Environment, Planning and Sustainable Development Directorate (EPSDD) in November 2016 regarding issues documented in “Getting Development Right for the Town Centre – The Gungahlin Residential Towers Story” available from the GCC website³ and published in edition #143 of the GCC newsletter⁴. Although, building height in West Gungahlin (precinct 2b) was the major issue identified in this correspondence, there were concerns with the aggregate impact of multiple developments(particularly related to traffic and solar access), the provision of open space, pedestrian and cycle access to and through the town centre, and the apparent lack of a cohesive strategy to develop the Gungahlin town centre consistent with the published master plan.

EPSDD initiated the TC Refresh in response to the concerns raised by the GCC, with a focus on three key issues:

- building height and character;
- upgrading and enhancing public spaces; and
- walking, cycling and road transport.

¹ <https://www.legislation.act.gov.au/ni/2019-641>

² <https://www.yoursay.act.gov.au/gungahlin-town-centre-planning-refresh>

³ <https://gcc.asn.au/getting-development-right-for-the-town-centre-the-gungahlin-residential-towers-story/>

⁴ [https://gcc.asn.au/Gunsmoke/GCC_Gunsmoke_143_\(Online\)%20\(1\).pdf](https://gcc.asn.au/Gunsmoke/GCC_Gunsmoke_143_(Online)%20(1).pdf)

Executive Summary

The GCC believes the concerns regarding the height of development within the Gungahlin Town Centre have been (belatedly) addressed in DV364 and therefore supports the proposed changes related to building height and form (notably the proposed rules R45, R46 and R61).

Other changes proposed in DV364 do not have the support of the GCC as they entrench the notion of Gungahlin as a dormitory district with a small employment base and limited services as detailed below.

Deletion of the Description of the Gungahlin Town Centre

DV364 proposes deleting the description of the Gungahlin Town Centre, ie. Removing this paragraph

Gungahlin Town Centre is the major hub for employment, shopping, social activities and public transport particularly serving suburbs within the Gungahlin district.

The GCC interprets this as a statement that the ACT government, through EPSDD, is abandoning their efforts to develop the Gungahlin Town Centre as a major hub and is pursuing the development of Gungahlin as a dormitory district with a small employment base and limited services.

The GCC strongly recommends that the following description be retained:

“Gungahlin Town Centre is the major hub for employment, shopping, social activities and public transport particularly serving suburbs within the Gungahlin district”.

Reduction of the Total Space Reserved for Commercial Development

The significant reduction of the total space reserved for commercial development (from 100,000m² to 65,000m²) proposed in DV364 are of great concern to the GCC. Further, the very short period of time over which this space is reserved reinforces a perceived lack of commitment to the development of the Gungahlin Town Centre as a major hub. The proposed Rule 41 states (in part):

“Block 3 and 5 Section 231 will be exclusively for the development of commercial office and ancillary use”.

And the proposed Rule 42 states:

“Rule 41 applies until 1 January 2023 or, until such time as nominated in writing by the relevant authority”.

The GCC shares the concerns of the Suburban Land Agency (SLA) which noted in the Consultation Notice⁵:

“The SLA are interested to understand what commercial and retail studies have been undertaken that would show a change to Gungahlin Town Centre operating as a commercial/retail hub over the next twenty years that would water down this provision”.

The EPSDD response to the SLA’s concern indicates the decision to reduce the amount of space reserved for commercial use was based simply on “the historical trend of commercial supply in the town centre”. The commercial reality of the lack of demand for new office space, particularly from the Commonwealth Government, and the competition provide by other town centres and the airport, means that for the Gungahlin Town Centre to be developed as true town centre the ACT government must take a much more proactive role to promote commercial development. This would reduce commuter travel, build the capacity of Gungahlin businesses, enhance the retail sector and provide a greater return on investment on major infrastructure investments such as Light Rail.

It is unacceptable to simply convert commercial space into residential as this provides a short-term financial return to the government, and no little or no benefit (short or long term) to the community. It is strongly

⁵ <https://www.legislation.act.gov.au/View/ni/2019-641/current/PDF/2019-641.PDF>

opposed by Gungahlin residents as indicated by initial responses to the GCC's 2019 Community Survey⁶ - from 385 responses as of 28 November 2019:

- 49% of respondents want “No more residential in the Town Centre”
- 29% of respondents want “25% residential and 75% business and community services in the Town Centre”

The GCC strongly recommends that the existing reservation of 100,000m² for commercial space be retained and the ACT government explore mechanisms to develop/attract more commercial interest in Gungahlin.

Repurposing of precinct 2a from “Office Core” to “Mixed Use East”

The repurposing of precinct 2a from “Office Core” to “Mixed Use East”, opens the door to further residential development in the town centre at the expense of other facilities including commercial, business, retail, entertainment and community use. The unexpected transition of precinct 2b from “Office Park” (as originally scoped in the precinct code) to “Mixed Use North West” (as proposed by DV364) has not enjoyed broad support from Gungahlin residents. Residents are justifiably concerned that a similarly poor-quality outcome may result from applying similar “mixed use” criteria to the Gungahlin Town Centre East precinct (2b) and the weak enforcement of the intent of these criteria.

It is acknowledged that DV364 improves the design criteria for precinct 2b more in line with community expectations, however many of these are unlikely to be applied in the next few decades given that most of the blocks within this precinct have had Development Applications approved under the existing precinct code.

Moreover, GCC is concerned that DV364 appears to have been no attempt to modify the Gungahlin Town Centre precinct code to accommodate the very significant increase in population density as a result of the high-rise residential towers constructed and under construction in precinct 2b. This include provisions for improved road infrastructure, access to green space and improved walking and cycling access to/from and through precinct 2b.

“Walking, cycling and road transport” is one of the three focus areas of the TC Refresh, and DV364 includes very little change to improve any of these aspects in the Gungahlin Town Centre. In fact, DV364 proposes that the road network hierarchy and pedestrian and cycle network be removed from the precinct plan (currently Elements 1 and 2) despite specific message from the community identified in the TC Refresh consultation report⁷ that speak to the importance of these to the overall experience of the town centre , ie.

- *There was significant concern about increasing traffic congestion as a result of the continuing growth of the town centre. Traffic flow and intersections also need to be improved.*
- *There are concerns that parking supply is not meeting short and long term demand.*
- *Safety for pedestrians, cyclists and motorist needs to be improved.*
- *There is strong support to improve the pedestrian and cycling network both within and into the town centre*

The GCC recommends that the further residential (mixed-use) development be minimised (not maximised) as part of DV364 in precinct 2a.

The GCC recommends that DV364 incorporate provision for improved road infrastructure, better access to green space and improved walking and cycling access to/from and through precinct 2b.

The GCC recommends that the road network hierarchy and pedestrian and cycle network elements of the precinct code be retained as part of DV364 to reflect the recommendation above and updated to address the community feedback from the TC Refresh.

⁶ <https://gcc.asn.au/survey2019/>

⁷ https://www.yoursay.act.gov.au/download_file/2936/612

Community Facilities as Equivalent Floor Space

The concept of providing community facilities within a “community facility zone” as “equivalent floor space within a mixed use development” as proposed by DV364 requires further explanation. It is unclear to the GCC how the proposed 3.8 hectares will be distributed, guaranteed, sustained and preserved over time, how this community space will be balanced with community space outside the town centre to ensure the needs of Gungahlin residents are met, and what the Community Need Assessment process will encompass.

The GCC recommends that additional explanation be included in DV364, or referenced by DV364, that outlines the mechanism that will enforce the equivalent floor space/community zone concept.

Yours Sincerely

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