BELCONNEN COMMUNITY COUNCIL SUBMISSION – DV 361

DRAFT

The Belconnen Community Council (BCC) welcomes the opportunity to comment on this variation to the Territory Plan and thanks EPSDD for their efforts with the consultation process to date.

The BCC cannot support Draft Variation 361 (DV361) in its present form and recommend that it be withdrawn and modified before being resubmitted for approval.

The problems with DV361 are:

• The unnecessary loss of public open space at Block 51 section 47
• A lack of clarification on replacement community facilities
• A perversion of the master plan process and community reference group to achieve a commercial outcome
• The draft variation conflicts with ACT Government climate change adaptation policies around urban heat islands and mitigation strategies
• The draft variation is in conflict with ACT Government triple bottom line analysis

The BCC recommend that the proposed land use from the draft Kippax Master Plan be adopted in place of the land use recommended in DV361. These can be found at pages 50 and 51 of the draft Kippax Master Plan from November 2015. We attach these at Appendix A and B.

We acknowledge that aggregating Blocks 66, 22 and 36 behind Kippax fair and enabling that space to be used to expand the retail space of Kippax Fair would be a sensible outcome, as well as allowing a new road to be built from Moyes Crescent to Hardwicke Crescent near the Tennis Club. This acknowledges that a small amount of public open space would be surrendered to commercial uses, although it would also enable a better community outcome and ensure better and safer vehicle, cycling and pedestrian access.

We also attach at Appendix C the proposed land use zones from the Kippax Master Plan. Aside from the public open space at Block 51 section 47 being retained, the 2015 and 2019 proposals are almost identical. Indeed, the use of Block 89 instead of Block 51 section 47 for Kippax Fair retail expansion is the best long-term option for the West Belconnen Community.

The BCC want to make two things absolutely clear – firstly that we are supportive of commercial and retail expansion in the Kippax precinct, and secondly that the views of the community we have been reporting to government, from our first submission in 2015 relating to open space at Kippax, remain unchanged in both substance and volume. Losing the public open space at Block 51 section 47 to a shopping centre is not the best option for the community.

We remain unconvinced that the conversion of the Block 51 section 47 playing fields behind Kippax Fair from public open space, to commercial zoning is the right option for the Kippax precinct. As the draft master plan found, the option to use Block 89 for the construction of a supermarket and extra carparking is a better option. That this option does not match the expectations of the owners of Kippax Fair and Elton Consulting, is unfortunate for them, but the BCC are confident that if Block 89
was placed on the open market that a developer would purchase that block and build new retail space, and extra parking, satisfying the requirement for extra retail space in the Kippax precinct. This is also the finding of the Macro Dimasi report that EPSDD commissioned, yet would not release to the Community Reference Group formed to discuss these very concepts.

Our disappointment in the Kippax Master Plan and DV361 is magnified through the way that the Community reference group has been used by EPSDD. An outcome of the reference group, agreed to by consensus, was that if the public open space was lost, that a pocket park with community facilities would be built in part of Block 89 Section 1. This was removed by EPSDD as an option in the Master Plan without any real explanation except that the public would object to losing car parking spaces. Removing this actually removes the consensus position agreed to by the community reference group to support the removal of public open space from Block 51.

A pocket park has been retained, but oddly located on Block 52. We attach at Appendix D and E the maps from the Kippax Master Plan showing these odd placements. The map from the Kippax Master Plan showing proposed key public spaces (our Appendix E) shows clearly that public open space is being reduced by 16,000 square metres, but not being replaced by quantity or quality.

It really is unacceptable to the community that with the removal of existing public open space and the demolition of an aged community health centre – that the only real return to the community is an addition to the Kippax Library at Block 88 Section 4, ironically almost certainly involving the loss of an existing children’s playground currently in that space. The other community component, a small pocket park squeezed between (proposed) 5 storey buildings near the current service station is just odd and difficult to understand. It is a poor community outcome.

The BCC insist that any land lost to the development must be replaced in the overall existing stock. Losing 16000sqm to commercial space is the equivalent of two rugby league football fields; renovating existing space does not maintain the current open space. We would like to see a government proposal for 16,000 sqm of community facilities or public open space in new developments in the West Belconnen area.

The BCC are not opposed to redeveloping the Kippax retail precinct. Every member of the West Belconnen community understands the importance of redeveloping the shopping centre so it is fit for purpose as our numbers swell by 30,000 over the next 20 years. The renovated centre will need to cater to a wide range of needs and provide an amenity that reduces the need to travel into the Belconnen Mall or further afield. This is particularly important to the residents of the retirement village across the road from the Kippax Centre and the increasing number of residents without access to private transport as the West Belconnen region is identified as one of the lower socio economic areas in Canberra. Meeting these requirements will provide a better outcome for our residents, business owners and workers, and our local economy.

The community service area must be fit for purpose and provide an amenity that will serve the community for many years to come. The design must encourage participation, maximise safety as a central feature and include ease of access for all users. The re-positioning of the People’s Park from its location on Block 52 to Block 89 near the Library and Community Service facility is a sensible step to harmonising this space with public transport access and will enhance the flow of people traffic through the precinct, however the size of the People’s Park and its design and amenity needs to be adequate for it to be useful and not a token gesture.

A further major flaw of the proposal in DV361 is that the rezoning to allow public open space to be built on and covered with a shopping centre, is that it conflicts with the ACT Governments Climate Adaptation policies by increasing the urban heat island by removing 16,000 sqm of green space. A commercial building, no matter how well built it is, will radiate heat in a way in which green space
The decision-making supporting DV361 almost certainly contravenes the ACT Governments policies on applying triple bottom line assessment to all policy decisions. As we have described through this submission, the social and environmental considerations of DV361, have not been weighted equally against the commercial factors. Any offsets or returns to the community in the form of community facilities and environmental offsets have not been advised in writing, or funded in the budget. The BCC acknowledge that a draft variation to the Territory Plan is not the place for this to appear, yet it remains a fact that approving DV361 in its present form, endorses non-adherence to ACT Government policy on Climate Change Adaptation and triple bottom line analysis in decision making.

Sometimes there is merit in rezoning spaces to accommodate maximum flexibility and while the bulk of the variation achieves this, we are unconvinced about the total offering of residential space and location. Residents and business owners understand the effects of severe wet weather events on this area; the existing public open space at Block 51 acts as a floodplain and drains into the Umbagong channel to Ginninderra Creek. Extensive work to the existing overflow channel and surrounding drainage points to bring the area to an acceptable level would be required. These things could be addressed in a development application or major works program, the community and our members would be comforted to see these things addressed in stronger terms in 4.2 of the Holt Precinct Code. The terms of the code do not currently address the flood plain in any way.

Block 89 does not experience any of these issues. The BCC recommend that Block 89 be offered for sale for extra retail and carparking space. This would not require a variation to the territory plan, as it is already zoned for such a purpose.

The current use of Block 51 by local sporting teams, a dog walking area for local residents and public open space that contributes to mitigating carbon dioxide emissions, in addition to absorbing floodwater in severe weather events makes it a net asset to the community and environment in its present form. Aside from being cheaper for Kippax Fair to build on than Block 89, it has greater value in its present form, and could be enhanced with improvements to sporting facilities.

In summary, the BCC do not support the loss of public open space from Block 51 and conversion to commercial space. Block 89 is a superior option for this purpose. The community expect that equivalent community facilities replace those proposed for removal, and this includes the health centre and the playing fields. If this cannot be explained to the community, EPSDD and the Assembly should not approve the draft variation in its present form.

Finally, we attach our previous submissions to the Kippax Group Centre Master Plan to reinforce the principles we are, once more, putting forward on behalf of the community. The ACT Government fund the BCC to serve as a channel to better community consultation and participation, we trust that the government will listen to the issues raised by long-term residents, business owners and workers who are all affected by decisions on their local community infrastructure. We believe if you live, work or play in our district, then you belong and we want this process to belong to everyone.

We look forward to working with you to provide any assistance that is required to bring this to a satisfactory conclusion and trust you will contact us should the occasion arise.

Kind regards,

Glen Hyde
Chair, Belconnen Community Council
15 June 2019
Appendix A

Proposed land use zones from the draft Kippax Master Plan November 2015 p.50
Appendix B

Proposed land use zones from the draft Kippax Master Plan November 2015 p.51
Appendix C

Proposed land use zones from the Kippax Master Plan 2019 p. 49
Appendix D

Proposed pocket park from the Kippax Master Plan 2019 p. 63

Figure 11: Cross-section of pocket park
Appendix E

Proposed public spaces from the Kippax Master Plan 2019 p. 63