



## **DOWNER COMMUNITY ASSOCIATION – SUBMISSION ON THE DRAFT INNER NORTH AND CITY DISTRICT STRATEGY (DISTRICT PLAN)**

The Downer Community Association (DCA) was formed in 1985 (incorporated in 1987) to represent the interests of Downer residents on issues which affect our suburb and surrounding areas. These include local facilities, planning and traffic, development applications, changes to parks and streets, and issues which affect local communities.

The DCA does not support the District Plan in its current form, and makes the following key points below.

- **Downer is a unique suburb in the inner north, and requires a dedicated planning and development strategy**

Of 160 hectares of Downer, a significant proportion of Downer is already residential (as opposed to green and community space). Even before the more recent urban intensification push, Downer was the third most dense suburb in the inner north (after Turner and Braddon) comprising mostly residential dwellings. At the time of the construction of the suburb, 66 per cent of the houses in Downer were government owned and constructed, reflecting a tight design with small blocks and limited open space. This saved on land costs and resulted in a relatively high-density residential area than achieved elsewhere in the inner north. The roads are narrower than other inner north suburbs (7-meter span as opposed to 10 meter span) and many streets do not have footpaths. This reflects the deliberate and stated design intent of Mr Jack Venn, NCDC planner, at the time.

That is, the zoning and planning foundations of Downer are not the same as those of Turner and Braddon. The inner north District Plan fails to consider these distinguishable features of Downer from other inner north suburbs and applies a cookie-cutter approach towards urban development, which, if applied to Downer, will not deliver the intended outcomes. The foundations are different.

Downer requires its own dedicated planning and development strategy.

- **Further significant development in Downer is not required to meet Government urban intensification dwelling infill requirements**

The *City and Urban Gateway Renewal Strategy 2018* (the Gateway Strategy) had a stated aim to deliver 37,000 additional dwellings. The Gateway Strategy also facilitates up to six story buildings being erected on Northbourne Ave, and up to four storey buildings on the west side of Blacket, Atherton and Banfield Streets in Downer.

In a separate but related document, the *ACT Planning Strategy 2018*, identified that 70 per cent of urban development was to be within the existing urban footprint, targeting 800 metres within light rail stops. This had the effect of potentially capturing 80 per cent of Downer within its remit for urban infill/intensification.

Now Downer is faced with the *Draft Inner North and City District Planning Strategy* (the District Plan) having the stated aim of an additional 22,400 dwellings in the inner north over similar timeframes (per page 98).

The DCA notes that the infill required to additional dwellings (37,000 dwellings or 22,400 dwellings), is in large part already in train through the developments underway or in planning on greenfield and brownfield sites on Northbourne Ave, Yowani, Kamberra Winery and Thoroughbred Park (race-course).

This means that intense urban infill in Downer is **not** required to meet Government infill targets. As noted above and for additional reasons elaborated upon further below, there are many inherent characteristics of Downer that make it unsuitable for intense infill.

Downer is experiencing population growth, as shown in the most recent census data (2021), with significant expansion in the younger and school age population, with the average age in Downer reducing (from 39 years, down now to around 34 years of age).

- **Downer has already made a significant contribution to the increased density of the inner north, and doesn't have the space and infrastructure to support more.**

Below is a potted history of various ACT Government planning and development strategies and 'initiatives' which have, and continue, to impact Downer.

In **1995** – medium density study for central Downer (Dwyer Leslie Study) – saw Downer increase its density at the former site of the John Curtin School of Medicine Laboratory, Appleby Court and Eulalia Court.

In **May 2002** – *DV 200* – being a variation to the Territory Plan, among other things, initially sought to add A10 zones (up to 80 per cent medium density zones) around the local Downer shops and the Dickson shops. However, this was subsequently reduced in Downer to 20 per cent medium density around the Downer shops, based on the fact that at the time there were no local shops in Downer.

There are limited no local shops in Downer.

In **August 2004** – *DV246 – Changes to Residential Area Specific Policy Overlays, Suburb of Downer* initially proposed increased density in the entire southern part of Downer to R2 (residential core, which included townhouses and flats). However, the final outcome was changed to reflect that only the section along Antill Street was rezoned to R3 (medium density), with the remainder 'de-zoned' to return to its suburban character. The reasons for the de-zoning are as relevant today as they were then, and were outlined in the ACT Government's own document at the time describing the reasons why Downer was **not** suitable increased density:

- The mature street scapes (including Berry, Blacket, Legge and Padbury Streets)
- The level of harmony in the built form, with a predominance of single-storey detached dwellings
- The narrow, intimate quality of the streets

All the reasons why Downer was not suitable for R3 medium density in 2004 still exist today.

It was also at this time that the ACT Government sold the local Downer shops, which was then owned by the Government, to a private investor to avoid the remediation costs of addressing asbestos in the building. The Downer Village currently hosts the Downer Vet and the Gang Gang café, but it no longer has the capacity to host local shops and because of space and heritage limitations.

In **March 2015** – DV 322 – *ACT Government Land Release Program* (facilitating the sale of the former Downer school site) proposed 300 units on the former Downer primary school site. The key take-out of that process was that the Downer Community was reluctant to lose the primary school, it did support the inclusion of three hectares of public land for affordable housing being sold to Community Housing Corporation (CHC) on the understanding that there would be a commensurate return by the ACT Government to the Downer community in the form of facilities and social infrastructure, which the ACT Government has never delivered on.

It is not Downer's fault that CHC didn't deliver on the affordable housing or that the ACT Government failed to manage the arrangements to ensure that they did so. Additionally, the ACT Government didn't have to sell the final section of the primary school site to Goodwin for a pittance at \$8m, which also has limited affordable housing incorporated into that development.

The ACT Government also failed to deliver on its written undertaking to purchase the Downer shops and make the shop space available as community facilities.

In short, the ACT Government has squandered a greenfield space and the opportunity to deliver affordable housing and reneged on its undertakings to provide a commensurate return to the Downer community.

Notwithstanding the consistent mismanagement by ACT Government of Downer community space, the 300 dwellings built on the old school site represent a 20 per cent increase in the housing stock in Downer. In preparation for the development, ACTEW prepared a report which showed that the existing sewerage capacity in Downer couldn't cope with this sort of increase in dwellings in Downer. Three options were developed to deal with this:

- (a) Replace the mains in resident's back yard (not supported)
- (b) Install a new main along Swinden Street (sufficient only to support the 300 units being added) – this was the option that was ultimately implemented and which killed a number of mature trees in the process of doing so.
- (c) Do a major upgrade of sewerage infrastructure in Downer (also not supported).

The **Gateway Strategy 2018** – saw the proposed adoption of six storey buildings on Northbourne Ave, and four storey buildings on the blocks backing Northbourne Ave (west side of Blacket, Ather-ton and Banfield Streets). It also foreshadowed the creation of an infrastructure strategy and plan. However, nothing has been delivered on this, other than a few bike racks at the light rail stop on Swinden Street.

The question then becomes, how does the ACT Government propose to cater for urban infill in Downer without a major investment in the underlying infrastructure, without further major imposition on the community (eg, digging up back yards or destroying established and mature street trees to install sewerage infrastructure) and without any track record of delivering on its promises.

- **There is a lack of trust and confidence in the ACT Government and related planning authorities.**

In summary, in the past 20 years, the ACT Government:

- sold off 80 per cent of public community land and delivered nothing in return. The only community infrastructure remaining in Downer is the Downer Community Centre and the Downer Pre-School

- promised something in return to the Downer community for the loss of green space and social infrastructure – but has not delivered on those promises
- closed the Downer Primary School, despite the rapid and increasing number of children in Downer
- has twice attempted to close the Downer Pre-School 1997 and 2005
- closed the Downer public toilets.

The ACT Government has consistently demonstrated it is either unwilling or unable to deliver on its commitments to the Downer Community, or physical or social infrastructure to support such density increases. The DCA has no confidence the ACT Government and related planning authorities.

- **The hodgepodge of various planning, strategies and variations has now resulted in varying and inconsistent statements about building height intentions in Downer**

The District Plan identifies future investigation areas, including:

- **'general urban'** which means that up to three storey buildings could be built in Downer
- **'urban center'** which means that up to six storey buildings could be built in Downer.

Based on the map at page 115 of the District Plan, this results in inconsistencies with the adopted Gateway provisions:

- Northbourne Avenue – can provide up to six storey buildings (as per Gateway)
- The west side of Blacket, Atherton and Banfield Streets – can provide up to four storey buildings (as per Gateway)
- The east side of Blacket, Atherton and Banfield Streets – can now provide up to potentially six storey buildings (as per the District Plan as potential 'urban centre' for further investigation)
- Larger swathes of Downer – can now provide up to potentially three storey buildings (as per the District Plan as potential 'general urban' for further investigation).

As a side-snapshot, the current potential building heights in Downer as described in the various ACT Government planning documents and strategies appear to look something like this:

6 stories		6 stories	
5		5	
4	4 stories	4	
3	3	3	3 stories
2	2	2	2
1	1	1	1
<b>Northbourne Ave</b>	<b>West side of Blacket, Atherton and Banfield Sts</b>	<b>East side of Blacket, Atherton and Banfield Sts</b>	<b>Large parts of Downer, at least towards Village</b>

The DCA has previously called for, and continues to do so, for an integrated, holistic, vision statement for Downer. Because different 'chunks' of Downer keep being taken incrementally and in different planning documents, and it is leading to inconsistent and absurd outcomes.

Based on the last five 'strategies' impacting Downer, it seems that the ACT Government and planning authorities do not have an integrated or practical strategy for urban development in Downer.

The DCA seeks genuine engagement with the ACT Government and the planning authorities to develop:

- a vision strategy for Downer
- an infrastructure delivery plan for Downer
- a dedicated strategy for the restoration of Downer's tree canopy, and enhanced preservation measures for mature trees (taking the Goodwin development as the most recent example, which saw the ACT Government approve the loss of a number of 70+ year old Pin oak trees)
- a traffic and parking strategy for Downer
  - o this is one issue discussed on page 27 of the District Plan as a key feedback piece from the community (not just Downer residence). Not only does the District Plan not provide a response to the existing parking issues, but it is also actively promoting the **reduction** of parking currently available. Instead of planning for an improved parking and traffic management strategy, perversely the District Plan is facilitating a worsening of parking and traffic management and to use the existing narrow streets beyond their capacity. The existing R3 zone on Blacket Street, for example, has made the east end of Blacket Street unmanageable due to excessive on-street parking. If the District Plan is implemented in its current form, this will be exacerbated all over the suburb.

It was disappointing in the extreme to have the DCA's recent written invitation to Mr Ben Ponton, to attend a Downer Community Association public meeting to discuss the District Plan summarily dismissed and referred to the website for comments. The DCA will continue to advocate for the ACT Government to genuinely engage with the Downer community, and not limited to online submissions.

- **The potentially positive aspects of the District Plan will not necessarily benefit Downer.**

There are aspects of the District Plan, whilst admirable and easy to support as general sentiments, will never be realised for Downer.

For example, the District Plan contemplates that it will promote Downer to become a sustainable urban centre ("inclusive centres and communities"), and to make more local centres viable. As a general statement, this is easy to support.

However, as a specific statement and in the Downer context, the purported benefit will never be realised for Downer residents:

- the physical limitations of the Downer urban centre which is only 495 square metres, currently comprising of only two businesses – the Downer Vet and the Gang Gang café. There is simply no space for many (any) additional businesses.
- the heritage listing of the former CSIRO research farm buildings means that the footprint of the site cannot be expanded.
- Whilst the commercial building was restored in 2019, it is now privately owned.

Similarly, the sentiments in the District Plan about the establishment and investment in the “blue green network” are admirable, there are no creeks, continuous cycle paths or large and connected green spaces in Downer to apply the principles.

The reality is that few of the positives from the District Plan will affect Downer, whilst all of the negative aspects of the District Plan will.

- **Downer is a vibrant and cohesive community, which undertakes a range of activities to support and ensure a liveable space for its residents**

Downer is an active community, undertaking a range of activities to benefit its residents, including:

- Day to day running and maintenance of the Downer Community Centre
- Five ‘pocket parks’ in Downer looked after by volunteer groups
- Maintenance of the garden and green spaces at the Downer village
- Relocation and building of a new frog pond
- Local Downer residents purchased and restored the abandoned Downer shops
- Community members volunteer their time for Clean Up Australia Day, Floriade plantings, Party at the Downer Shops and support for other ad hoc events.

The DCA in conjunction with existing Downer residents will continue to make welcome new members to its community. Downer is not anti-development – rather, it supports thoughtful development which has regard to the unique characteristics of the suburb. In particular, the DCA would be willing to engage with the ACT Government on a pilot program or demonstration co-housing strategy, to provide enhanced opportunities to age in place.

As the current District Plan does not pay sufficient account the characteristics of Downer, the DCA does not support the District Plan in its current form.

The DCA would welcome a discussion with the ACT Government of a dedicated planning and devel-



opment strategy for Downer.

Robyn Rennie  
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(On behalf of the Downer Community Association)