

# Downer Community Association (DCA) submission on Draft Plan Amendment 09 – Northern Gateway (DPA09)

## Background to the DCA

The Downer Community Association (DCA) was established in 1985 and incorporated in 1987 to advocate for the interests of Downer residents regarding issues affecting the suburb and its surrounds. This advocacy encompasses matters such as local facilities, planning and traffic, development applications, modifications to parks and streets, and broader community issues.

While some aspects of DPA09 are admirable in principle, **there are few positives for the Downer community, while the negatives are likely to be felt acutely.**

## Downer's Unique Characteristics

Recent census data (2021) indicates population growth in Downer, especially among younger and school-aged residents, with the average age dropping from 39 to approximately 34. More than two-thirds (67 per cent) of dwellings are separate houses, with nearly 45 per cent of those having three or more bedrooms. 63.5 per cent are family households, with the composition of 'couple family with children' being the largest cohort at nearly 45 per cent.

Noting that Downer has already contributed significantly to inner north density (most notably through developments on the old primary school site, including the Bradfield and the Goodwin development), **the amendments proposed will fundamentally alter the character of Downer** – this has not been recognised or meaningfully considered as part of the proposed amendments.

Further (even if it was the intention of DPA-09) to change the character of Downer, the proposed amendment **does not give meaningful consideration to the lack of space and infrastructure in Downer to support additional growth** – rather, it pays lip service and vague references to design excellence and thoughtful development approvals (as if such a thing exists in the ACT).

**Downer stands out as a distinct suburb within Canberra's inner north, necessitating a tailored approach to planning and development** – which DPA09 does *not* deliver upon.

Of the suburb's 160 hectares, a considerable portion is already dedicated to residential use, with limited green and community spaces. Historically, Downer was the third most densely populated in the inner north, following Turner and Braddon, and is mainly composed of residential dwellings.

During its initial development in the 1960's, 66 per cent of Downer's homes were government-owned and constructed. This led to **small blocks, limited open space, and higher density** compared to other inner north suburbs. **Roads were intentionally designed narrower** (7 metres wide versus the typical 10 metres) and many **streets lack footpaths**, reflecting the vision of Mr Jack Venn, the NCDC planner.

**DPA-09 fails to recognise the original planning fundamentals of Downer are different from its neighbouring inner-north suburbs.**

## Downer's Distinct Planning and Zoning Context

Because of this, it is important to recognise that **Downer's planning and zoning origins set it apart** from neighbouring suburbs such as Turner and Braddon. As a result, the strategies and frameworks typically employed by the ACT Government Territory Planning Authority across Canberra cannot be simply transferred to Downer without careful consideration of its unique circumstances. **This is particularly relevant with respect to DPA09, where a standardised, "cookie-cutter" planning approach will not sufficiently address the specific requirements and challenges present in Downer.**

Instead, a more nuanced and tailored planning process is necessary to ensure that the suburb's individual characteristics and needs are properly reflected and accommodated in future development strategies.

## Historical Government Strategies and Urban Intensification – a potted history of embuggerance upon the suburb of Downer

- 1995 – Medium Density Study (Dwyer Leslie Study): Increased density at the former John Curtin School of Medicine Laboratory, Appleby Court, and Eululia Court.
- May 2002 – DV 200: Proposed up to 80 per cent medium density zones around local shops, later reduced to 20 per cent for Downer due to the absence of local shops.
  - There remain limited or no local shops in Downer.
- August 2004 – DV246: Initially proposed increased density in all of southern Downer (R2 zone), but only the section along Antill Street was rezoned to R3 (medium density).
  - The rest returned to suburban character, ***with previous reasons for resisting higher density still relevant today.***
- Government Sale of Shops: The ACT Government sold the local Downer shops, now hosting the Downer Vet and Gang Gang café, but the site lacks the capacity for additional shops due to space and heritage constraints.
- March 2015 – DV 322: Proposed the sale of the former Downer school site for 300 units, marking a 20 per cent increase in Downer's housing stock. Community concerns included the loss of the primary school and the lack of promised facilities and social infrastructure. Sewerage capacity was insufficient for the increase, with only a limited upgrade implemented, which also resulted in the loss of mature trees.
- City and Urban Gateway Renewal Strategy 2018 sought to deliver 37,000 additional dwellings and allowed for up to six-storey buildings on Northbourne Ave and up to four-storey buildings on the west side of Blacket, Atherton, and Banfield Streets. The ACT Planning Strategy 2018 aimed for 70 per cent of urban development within the existing footprint, targeting areas within 800 metres of light rail stops—potentially encompassing 80 per cent of Downer for infill.
  - After a vocal campaign by the Downer community, it seemed to be broadly accepted by ACT government that much of the infill required would be progressed through the developments on Northbourne Ave of Yowani, Kamberra Winery, and Thoroughbred Park.
  - Given these ongoing developments, further substantial urban infill within Downer seems unnecessary to meet government objectives.

- And now, in September 2025, the introduction of DPA09 brings forward a significant proposal to amend existing zoning in Downer. Specifically, the changes seek to rezone areas currently designated as RZ1 suburban residential zones to RZ3 residential zone and RZ4 medium density residential zone. Additionally, the proposal includes the removal of the 70-metre setback requirement in section 51 of Downer. The consequence of the proposed rezoning will see:

- Construction of apartment buildings of at least five storeys along Northbourne Avenue.
- Development of at least three-storey dwellings on Blacket, Atherton, and Banfield Streets within Downer.
- These changes are expected to result in **the overshadowing and overcrowding** of a suburb that is currently characterised by predominantly one-storey dwellings. **The existing infrastructure in Downer, including footpaths, parking, sewerage, and other essential services, is not sufficient to support this level of densification.**

## Concerns Regarding Infrastructure Investment and Government Commitment

### Insufficient Planning for Essential Infrastructure

Significant **apprehension exists about the ACT Government's capacity and resolve to provide the necessary infrastructure for increased urban infill in Downer.** While page 16 of DPA09 suggests that "infrastructure and operational efficiencies" will deliver public benefits through reduced per capita expenditure—allowing public funds to be redirected towards amenities, services, and infrastructure—**these claims fail to acknowledge key realities.**

### School Capacity Constraints

Since the Downer school no longer exists, children in the new development would have to go to either Majura or Lyneham primary schools, neither of which is convenient and each of which requires crossing main roads. Schools designated under priority enrolment for Downer, Lyneham, and Watson are **already** operating at full capacity. Where will any new students go? **Promises to review this situation in the next ten years are inadequate and will not address immediate or near-term needs.**

### Historical Failure to Invest Proactively

The ACT Government has **consistently neglected to make proactive investments in essential infrastructure** required to support urban development and increased density. There is **little evidence to suggest that the government or planning authorities will adopt a different approach in the future.**

### Erosion of Community Trust

The absence of significant infrastructure upgrades, alongside previous failures to deliver on promised community benefits, has **diminished public trust and confidence in both the Government and planning authorities.** DPA09 is perceived to contain vague statements, biased assessments and poorly defined commitments that do not sufficiently address the community's concerns.

## Absence of Meaningful Analysis

**A critical shortcoming of DPA09 is the lack of any substantive or rigorous analysis to support its proposals.** The document fails to include crucial demographic modelling or thorough infrastructure assessments. For instance, there is no evaluation as to whether the current sewerage infrastructure can accommodate the projected influx from an additional 1,000 dwellings. Similarly, there is no examination of the capacity of existing inner-north GP clinics and medical services, nor any assessment of the added burden these developments would impose.

Although the document contains a cursory mention of traffic analysis, this gesture is superficial and insufficient. **The absence of meaningful data and robust analysis not only fails to inspire public confidence, but can also be perceived as intellectually dishonest and misleading.**

## Potential Negative Impacts of Increased Housing Density Inadequate Acknowledgement of Adverse Consequences

DPA09 appears to **minimise the potential negative impacts associated with increased housing** density, particularly as outlined on pages 16 and 17. In reality, higher density in certain areas will inevitably put added pressure on existing infrastructure—such as roads, schools, parks, and public services. **This strain is likely to manifest as increased traffic congestion, overcrowded educational facilities, and overstretched public amenities.** Although it is claimed that these issues will be addressed through comprehensive planning and targeted infrastructure investment across the Territory, there is little evidence to suggest such mitigation has been effectively implemented in the past.

## Parking Shortages and Community Friction

Appendix 1 of the supporting document, called “Transport Modelling of Northern gateway Development Options” considers only increased traffic on the main “northern corridor” and fails to address the traffic and parking implications of the proposed redevelopment for the internal streets in Downer.



***Parking Congestion in Blacket St already***

Rising housing demand typically results in car parking shortages, which, in turn, can create tension between new and long-term residents over limited parking availability. This also increases the burden on residential streets. While the introduction of light rail and the planning assessment process are presented as solutions—purportedly considering traffic impacts prior to development approvals—the current situation in areas like the east end of Blacket Street, Atherton Street and Bradfield Street clearly **demonstrates these measures have not resolved parking issues to date, and are equally unlikely to in the future.**

### **Gentrification and Increased Financial Burdens**

Another significant concern is the potential for unintended gentrification, often resulting in increased rates for existing residents. The supposed mitigation—allowing leaseholders to apply for a value reset via lease variation—**places the onus on residents to seek relief from costs triggered by government-imposed changes.** This process does not enhance leaseholders' amenity, use, or enjoyment of their land, yet it requires them to shoulder additional financial responsibilities. For those considering relocation, this would bring further burdens, such as the payment of stamp duty to an undeserving ACT Government and the inconvenience and expense of moving.

### **Impacts on Local Character and Amenity**

The intensification of development poses **risks to the established character and amenity of the local area.** The ACT Housing Design Guide, introduced as a mitigation tool through the development process, is meant to ensure that new builds respond sensitively to the unique context of each location. It purports to promote bespoke design outcomes that integrate projects into their neighbourhoods, with the support of the Missing Middle Housing reforms, which claim to prioritise neighbourhood character and amenity. However, these

**assurances are viewed with scepticism, as they often appear vague and lack substantive evidence of effectiveness.**

The development proposal fails to take account of the nuisance and disruption that redevelopment would produce. It makes no mention of the loss of trees, lawns and gardens, or the destruction of existing well-established housing. It fails to notice the prejudice to residents on the other sides of the narrow internal streets, who would lose their views and sunlight and be overlooked by buildings 12 metres high just across the road. There is no suggestion of any compensation for the loss of value that these changes will bring.

### Questionable Effectiveness of Mitigation Measures

The overarching assertion is that negative impacts will be adequately mitigated through relevant design guides and protections within the Territory Plan and related documents. However, the evidence along Northbourne Avenue—a corridor now dominated by unattractive, monolithic developments—raises serious doubts about the credibility of these claims. Development in Braddon only serves to emphasise these concerns. There is **little reason to believe that the approval process for new developments in Downer will yield more positive outcomes**, given the current track record.

### National Capital Plan and Symmetry Concerns

Previous iterations of the National Capital Plan, alongside engagement with the National Capital Authority, emphasised the goal of establishing "symmetry" along Northbourne Avenue. This design principle was apparently intended to create a balanced and harmonious streetscape as one of the main entrances to the Nation's capital.

However, the current proposed amendments appear to have set aside this concept of symmetry. The site presence of Southwell Park in Lyneham, which is designated as urban open space, makes it impossible to achieve symmetry, as it cannot be mirrored on both sides of Northbourne Avenue.

As a result, the **construction of five-storey buildings on the Downer side of Northbourne Avenue will lead to a pronounced "lopsided" visual effect along the corridor**. This imbalance will be particularly evident at the approach to the Nation's capital, and will persist until reaching Antil Street, where the urban context shifts.

### Consultation with Other Government Entities

#### Education Department Capacity

Page 25 of DPA09 details consultations undertaken with the Education department, suggesting that there is sufficient capacity within the existing schools in the surrounding area to accommodate the increased population growth anticipated as a result of the DPA. However, this **assertion stands in stark contrast to the lived experiences of parents** within the local catchment, many of whom report that schools are already operating at or beyond full capacity.

#### City and Environment Directorate: Traffic Impacts

Further, on page 26, DPA09 describes engagement with the City and Environment Directorate regarding the potential impacts of increased traffic. The Directorate's modelling forecasts "only minor impacts on congestion in the Northern Gateway precinct compared with the base case." While this may technically indicate a marginal increase, **it fails to address the reality that the baseline congestion is already a significant problem**. In effect, the modelling concedes that conditions will deteriorate, albeit only slightly, from an already challenging starting point. **It fails completely to assess the traffic and parking impact in the narrow internal streets.**

## Previous Consultation Processes and Community Engagement

Page 25 of DPA09 places significant emphasis on the purported previous consultation efforts with the Downer community. According to the document, the outcomes of this consultation supposedly resulted in the reduction of permitted building heights in Downer to between 12 and 18 metres. Furthermore, DPA09 claims that its proposed changes are guided by a decade's worth of Government consultation on various strategic and statutory planning projects.

However, this **depiction is a significant misrepresentation of the actual events and exaggerates the level of community support**. The reduction in building heights was not a proactive concession by the authorities, but rather a direct consequence of the “Don’t Dump on Downer” campaign, a grassroots effort led by local residents. This critical context is conveniently omitted from the official narrative.

The Downer Community Association has consistently made numerous and repeated submissions to both the ACT Government and planning authorities over the years. Despite this sustained engagement, most of the Association’s input has been largely disregarded.

Moreover, there has been a marked lack of corresponding investment in infrastructure for the Downer community and its neighbouring suburbs. A clear example of this neglect is the absence of a new footpath connecting the more than 300 dwellings on the former Downer Primary School site to the light rail. Instead, residents are still required to share the original narrow footpath constructed in the 1960s with a vastly increased number of school children and commuters on bikes and electric scooters. This ongoing situation **undermines the credibility of the Government's claims regarding meaningful consultation and community benefit**.

## Concerns over Height Limit Misrepresentation

There is significant concern regarding the way planning authorities have communicated proposed building height limits in Downer. Within the ACT planning framework, a building’s maximum height in an RZ4 zone is typically 12 metres, or in some instances, 12.5 metres, which generally equates to three storeys.

Despite this, notices issued to directly affected lessees in Downer around 19 September 2025, along with other documents released for public consultation, appear to suggest that rezoning with an 18-metre height limit is comparable to the standard RZ4 zone. This is not the case. An 18-metre maximum height allows for buildings of approximately five storeys, which is fundamentally different from the three-storey character of a typical RZ4 zone. In reality, the proposed 18-metre height limit is much more similar to RZ5—high-density—zones, where height limits are generally around 21.5 metres. **Presenting an 18-metre height cap as if it aligns with RZ4 standards is therefore misleading and creates confusion within the community.**

Some may view this approach as misleading and deceptive conduct on the part of planning authorities. The Downer Community Association strongly rejects these characterisations as mere technicalities or jargon, and instead **calls out the practice as an attempt to disguise the true impact of the changes. Allowing five-storey developments immediately adjacent to predominantly single-storey homes dramatically alters the established residential character and is unacceptable to the community.**

# The Downer Community Association Position on DPA09

The DCA maintains several clear and firm positions in response to the current planning proposal (DPA09) and ongoing development issues in Downer.

## Building Height Limits

The DCA strongly advocates for a maximum building height limit consistent with the standards of the RZ3 zone. This would restrict development to a maximum of three storeys, or 12 metres, on the following site:

- Northbourne Avenue- service road.

The DCA strongly advocates for a maximum building height limit consistent with the standards of the **RZ2** zone. This would restrict development to a maximum of **two** storeys, or **8 metres**, on the following sites:

- West side of Blacket Street
- West side of Atherton Street
- West side of Banfield Street

This approach is aimed at preserving the established residential character of these areas and preventing the introduction of high-density, multi-storey developments that would be out of place adjacent to predominantly single-storey homes.

## Timelines and Certainty for Residents

The DCA notes that while DPA-09 provides a broad, decade-long timeframe for proposed changes, it fails to deliver the level of detail required for Downer residents to make well-informed decisions about their futures. Many residents have made significant personal investments in their homes, relying on the suburb's established character and neighbourhood qualities. For some, these investments were made with the expectation that the community would retain the attributes present at the time of purchase. Others have long-term plans to retire in place, having chosen Downer as the location to spend their later years.

However, DPA-09 introduces the potential for dramatic changes to the suburb's character, raising considerable uncertainty for current residents. This uncertainty may compel some individuals to consider leaving the area due to concerns over the impact of the proposed developments.

The DCA therefore urges the ACT Government to provide more concrete and detailed timelines regarding the proposed changes. Greater clarity would empower residents to make properly informed decisions about their housing and future plans. Furthermore, the Association recommends that the Government consider waiving stamp duty for those homeowners whose properties are directly adjacent to and impacted by the proposed changes, should they choose to relocate as a result of the developments.

## Community Infrastructure Investment

The DCA calls for tangible and meaningful investment in community infrastructure prior to any further urban development or intensification. The Association believes that essential upgrades—such as new footpaths, improved public transport access, and other public amenities—must precede additional population growth to ensure that the quality of life for existing and future residents is not diminished.

## Comprehensive Demographic and Services Modelling

The current planning approach provides only a vague reference to addressing school capacity, without offering any specific details or concrete commitments. There is a notable absence of discussion regarding access to medical services, evaluation of the base infrastructure's ability to support increased urban density, or any actual budgeting and delivery plans for substantial investment in the suburb.

The correct process should involve, firstly, conducting thorough analyses to understand the impact on local demographics and essential services. Decisions regarding urban development and intensification should only follow such assessments. However, it appears that the ACT Government has reversed this logical order, prioritising decisions ahead of comprehensive analysis.

## Comprehensive Traffic Study

The DCA insists on the completion of a meaningful and transparent traffic study. This study should model and fully disclose the absolute impacts of proposed developments on local traffic conditions, not just the incremental changes. The DCA is concerned that the current traffic situation is already problematic, and any additional strain must be properly assessed and addressed before further development is approved.

## Retention of the 70-Metre Setback on Northbourne Avenue

The DCA demands the retention of the existing 70-metre setback along Northbourne Avenue. This setback is regarded as a vital element in maintaining the streetscape and protecting the amenity of the area. Preserving this buffer zone is integral to ensuring that new developments do not encroach upon the established character and liveability of Northbourne Avenue and its surroundings. There is no mention of the required setback for the other affected streets included in the plan. What will they be?

The DCA is available to discuss any aspect of this submission further.



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