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COMMENTS ON DA 202240826, Block 29, Section 88, Griffith

Proposed construction of a new bitumen 86 space carpark to replace the existing gravel carpark, landscaping and associated works on Monaro Crescent, Griffith

Dear Planners

The Griffith Narrabundah Community Association (GNCA) welcomes the opportunity to comment on this issue. The Association has over 450 members plus a large number of other supporters in the area the GNCA represents.

Introduction

This Development Application should never have been submitted and endorsed by the ACT Government.(TC7CS). The Object of the current Planning and Development Act is “to provide a planning and land system that contributes to the orderly and sustainable development of the ACT—

- (a) consistent with the social, environmental and economic aspirations of the people of the ACT; and
- (b) in accordance with sound financial principles.”

1. The Act was surely never intended to enable a private organisation, in this case, Canberra Grammar School (CGS), to be afforded special treatment by the permanent use of public parkland (PRZ1, Urban Open Space) for a bituminised car park to hold eighty-six cars.

2. From 2019 until 2023 the land in question was used for the specific use of workers involved in construction projects on CGS land, in order to reduce the traffic hazard to children on school grounds.

Minister Steel, in a letter written on 24 May 2022 stated:

“Please be assured that as part of the public unleased Land permit conditions, the Canberra Grammar School must undertake restoration works to restore and rehabilitate the parkland to its original condition, once the permit has expired.”

As the construction projects will be completed in 2023, why is it necessary to use public open space for the benefit of just one entity?

3. The proposal is in direct conflict with the ACT Government's More Active Travel policy. This aims to enhance our quality of life in Canberra, by encouraging more walking, cycling and other forms of active travel and reduce the city's dependence on the private car. All this proposal will do is generate more unwelcome cars on the already congested streets near the CGS. It is ironical that the Transport and City Services Directorate is the sponsor of this Development Application.

4. The CGS has never stated why it needs this car park, as the construction work on the school site has been completed.

5. The CGS site covers close to 19 hectares and the CGS has had several years to consider its future car parking requirements. It should have made plans for car parking requirements on the school's site itself. Instead it has used its land for extensive sports grounds and low-rise buildings. Moreover, the existing bitumen carpark on school grounds fronting Monaro Crescent would allow construction of a multi-storey carpark: there is no evidence of the school having considered this alternative.

6. The GNCA was disappointed that the CGS did not consult directly with the community, consulting through a third party is rarely successful, as in this case. There was no opportunity to have a reasonable interaction with the CGS on this issue.

7. Nowhere in the documents does the school offer to buy the land. According to recent UVs we are looking at about \$2.8 million for the land. Maybe more, if the school charges parking fees.

8. The DA states that: "That the purpose and nature of the works are to enhance the quality of the car park which are no longer structurally sound. The works will enable safer and more convenient active travel and movements for people through the path network"

- a) There is no substance to the claim that the car park is any less structurally sound than when it was first installed; it certainly presents no danger to anyone in its present condition; and
- b) the claim regarding safer active travel and movements through the path network is has no substance.

DA 202240826 is not compliant with the Territory Plan and should be rejected

In the PRZ1 – Urban Open Space Zone Development Table, a car park is listed as a prohibited development. However, some development that would otherwise be prohibited may be assessed under the merit track if it can be defined as ancillary, minor or temporary use.

The surrounding area is a grassed parkland. It is difficult to see how a carpark on that is *ancillary* to anything else on that land.

In any case the car park would serve activities on Block 1, Section 6 Red Hill, which contains the CGS and is situated on the opposite side of Monaro Crescent.

Minor use means the use of land for a purpose that is incidental to the use and development of land in the zone and includes but is not limited to open space; public car parking; community path systems; shared circulation spaces (such as lift wells, stair wells); minor service reticulation; other utility service reticulation; other utility services that do not exclude other uses from the land; street furniture and the like.

(Definition from ACTPLA email on 9 February)

The Application indicates a proposed spend of \$860,000 and covers an area of approximately 2000m². The permanent car park cannot be considered as an incidental feature and is much more than a minor entity.

GNCA considers that what is proposed is a prohibited development and should be rejected outright.

Other places where the DA is non-compliant

1. Zone Objectives-PRZ1 Urban Open Space

Zone Objectives Commentary by GNCA

- a) *Provide an appropriate quality, quantity and distribution of parks and open spaces that will contribute to the recreational and social needs of the community*

Non-compliant. The proposal will degrade the quality and quantity of the amenities of the public open space, by replacing green areas with bitumen.

- b) *Establish a variety of settings that will support a range of recreational and leisure activities as well as protect flora and fauna habitats and corridors, natural and cultural features, and landscape character*

Non-compliant. The proposal has nothing to do with recreational activities, it will serve as a car park across the road for use by the CGS. Moreover, kangaroos feed nocturnally on the land in question, particularly during the dry months when grass on Red Hill is inadequate. Rosellas and galahs also feed on the grass seeds.

- c) *Allow for stormwater drainage and the protection of water quality, stream flows and stream environs in a sustainable, environmentally responsible manner and which provides opportunities for the community to interact with and interpret the natural environment.*

Non-compliant. Replacing a porous green space with an impervious area of about 1000 m² is not environmentally responsible and will degrade the public open space.

- d) *Allow for ancillary uses that support the care, management and enjoyment of these open spaces including park maintenance depots, small-scale community activity centres.*

Irrelevant. The proposal is not for an ancillary use, depot, or community activity centre.

- e) Ensure that development does not unacceptably affect the landscape or scenic quality of the area, adequacy of open space for other purposes, or users, access to open space, or amenity of adjoining residents.

Non-Compliant. The proposal reduces the area that can be used for improvements to the landscape and the scenic quality of the public open space.

- f) *Provide for integrated land and water planning and management.*

Irrelevant. The works would not propose changes to the management of land and water per se. However, there are several areas in the PRZ1 zone where frogs are active after rain – these areas can be easily identified by the sedge and other grasses growing there. Any fuel or oil spills are likely to affect frog populations adversely.

- g) *Provide safe pedestrian and cycling access to urban open space to promote active living.*

Non-compliant. The proposal will encourage greater car use in an already congested area.

2. Parks and Recreation Zones Development Code

Element 3: Built Form 3.1

Materials and Finish.

There is no applicable rule.

C17 The development uses high quality materials that are not incompatible with the character of existing adjacent development and the desired architectural character of the area.

Non-compliant. ~2000 m² of black bitumen in the middle of urban open-space parkland, is totally unacceptable because it is imperious and will increase the heat island effect for local residents as well as the runoff into Lake Burley Griffin.

Element 4: Access 4.1 Pedestrian Movement

C22 Safe and convenient movement of public transport passengers, pedestrians and cyclists is provided

Non-compliant. How can the addition of a car park, which will add to more vehicles on the roads be relevant to public transport?



Dr David Denham
President, Griffith Narrabundah Community Association

20 February 2023