

**From:** [REDACTED]  
**To:** [Terrplan](#)  
**Subject:** Objection to Draft Plan Amendment B – Forrest Section 19 Block 9  
**Date:** Thursday, 26 September 2024 9:14:05 AM

---

[You don't often get email from [REDACTED]. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

Caution: This email originated from outside of the ACT Government. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear Territory Plan & Coordination Section,

My name is [REDACTED], and I am a resident of [REDACTED]. I am writing to formally object to the proposed zoning change for Forrest Section 19 Block 9 from CZ6 (Accommodation and Leisure Zone) to CZ5 (Mixed Use Zone), as outlined in Draft Plan Amendment B.

I would like to raise the following concerns:

1. **Overdevelopment and Height Issues:** The introduction of a 23-metre (seven-storey) height limit is excessive, particularly for a site located on a hill, where it will visually dominate the surrounding area. Most nearby buildings are limited to four storeys, and the proposed height is not in keeping with the established character of the neighbourhood.

2. **Impact on Community Character:** The current zoning (CZ6) was designed to maintain the area as a space for leisure and accommodation, which serves both the local community and visitors. The proposed shift towards mixed-use development could lead to over-commercialisation and a loss of these valuable community facilities.

3. **Lessee's Purchase Under Existing Zoning:** It is important to note that Sirocco Pty Ltd, the current lessee, purchased the land under the existing CZ6 zoning. This raises questions about the necessity of the proposed change, as the lessee was fully aware of the zoning conditions at the time of purchase.

4. **Concerns About Consultation Process:** Having attended a prior consultation, I would also like to express my dissatisfaction with the process led by Purdon Planning. The consultation has primarily focused on the indicative development rather than addressing the core issue of the zoning change. This approach has been disingenuous, as it avoids transparent discussion about the broader impacts on the community, such as overdevelopment and loss of community space.

5. **Environmental and Traffic Impacts:** The proposed changes could have additional consequences, such as increased traffic and parking issues, as well as a negative impact on the natural landscape, particularly given the site's elevated position.

I urge the Territory Plan & Coordination Section to consider these points seriously in the final consultation report. The local community deserves a thorough and transparent consultation process that reflects the true implications of this zoning change.

Please do not hesitate to contact me at [REDACTED] if you require further information.

Thank you for your time and consideration.

Kind regards,

[REDACTED]



## Inner South Canberra Community Council

**To: Territory Plan & Coordination Section EPSDD**

[\(terrplan@act.gov.au\)](mailto:terrplan@act.gov.au)

### **DRAFT PLAN AMENDMENT B: FORREST – SECTION 19 BLOCK 9 COMMENTS BY INNER SOUTH CANBERRA COMMUNITY COUNCIL (ISCCC)**

The ISCCC has been alerted to this Draft (major) Plan Amendment by the Forrest Residents Group. We are aware that the previous development approval for a seven-storey hotel on this site, which created considerable concern in the area, has lapsed. We understand it is now intended to redevelop the site (currently used as a carpark) for multi-unit housing. This is not a permitted use in the current ‘CZ6 – Accommodation and Leisure Zone’ so a rezoning for this block is required.

**We note that the proposed new zoning is ‘CZ5 – Mixed Use Zone’, with a “23m building height limit, excluding plant room”. The ISCCC does NOT support this proposal, for the reasons set out below.**

Our comments refer to the information provided in the ‘Supporting Report’ by Purdon Planning, as follows:

#### **1.PRIOR CONSULTATION**

“*Community feedback*” (Purdon section 6.2, p.38)

“***Density and height*** (and the perceived flow on effects of ***overshadowing and overlooking***) based upon the indicative development proposal as shown, were of concern for almost all consultation session participants, those that provided written feedback and those who called.”

“*Response to feedback*” (s.6.3, p.39):

“*Issues concerning the design of the indicative development were provided to the lessee, who has considered other development opportunities, and remains committed to the indicative scheme as shown in the consultation collateral. Design issues such as site open space, site permeability, site access, etc. can be resolved further at DA stage.*”

■

**This is a totally inadequate response to the feedback and fails to address the substantive concerns raised.**

## **2. SECTION MASTER PLAN (Purdon s.7.3, p.48)**

*“One of the issues raised by local residents as part of the community consultation was that the site should be considered in the context of an overall Master Plan for the section.” BUT “The diversity of land uses and the likelihood that the recreation and community facilities will be retained highlights the challenge in establishing a coherent master plan for the Section.”*

**The ISCCC does not agree with Purdon and believes a whole section Master Plan would be very beneficial in setting the parameters for future redevelopment of Section 19 Forrest, rather than proceeding with ‘spot’ rezoning of a single site.**

## **3. ALTERNATIVE RESIDENTIAL ZONES (Purdon s.7.4, p.50/51)**

*“A high density RZ5 zoning for the site is considered appropriate, on face value. However, the site adjoins RZ2 land to the south and RZ1 land to the west. As such, the **planning controls limit development to 3 storeys for 50m into the site.** [sic] The site has a north-south dimension between 60m and 65m. This means that allowing for boundary setbacks, there is no part of the site that could be developed to the potential intended for RZ5 high density residential sites. If the land was zoned RZ5 the same built form outcome would be achieved as per the RZ4 zoning described above. As such it is considered that an RZ5 residential zoning is not appropriate. It is considered that a CZ5 Mixed Use zone is the most appropriate zoning for the subject site.”*

**This is a wrong and very misleading statement.** In fact para. 14.1(d) (i) of the Residential Zones Specification says, re RZ5 zones: “For that part of the building within 50m of **the boundaries of blocks in RZ1, RZ2 or RZ3: 3 storeys**”. This would apply from the common boundary with Block 6 to the south-west, and from the **front** boundaries of the residences opposite the site along Dominion Circuit, which is 30m wide. So under RZ5, building height within 50m of the southern-western site boundary, which is directly adjacent two-storey residential apartments zoned RZ1, would be limited in height to three storeys, **very appropriately in our view.** This would only affect the proposed ‘western’ building. On the other hand, building height along the Franklin Street side of the site would be limited in height to three storeys for the first 20m from the corner, but would then allow the eastern building to be **up to 21.5m** in height, as per ‘Assessment Requirement’ 20 of the Residential Zones Policy. **In our view these would be appropriate building height controls for the site.**

There are NO building height limits for CZ5 zone in the Commercial Zones Policy or Specifications. So, **there is nothing in the current Draft Plan Amendment which would prevent the whole site being redeveloped to seven storeys, or 23m high, excluding plant room.**

**The Purdon report and the submitted ‘Master Plan’ for the site makes it clear that the intention is to develop the site fully for multi-unit housing, not mixed uses. No justification, apart from building height limitations, has been provided for the proposed CZ5 zoning. In our view, RZ5 zoning is more appropriate.**

#### **4. OVERSHADOWING (Purdon s.7.10 p.55)**

*“The proposed development will not generate significant overshadowing of adjacent development including existing residential uses.”*

**On the contrary, the shadow diagrams provided in the ‘Supporting Report’ show there will be significant overshadowing of the adjacent two-storey residential development to the south-west (Block 6), caused by the proposed ‘western’ building being up to 7 storeys high. Similarly, there would inevitably be significant actual or perceived overlooking from the proposed building. This is highly inappropriate and shows a complete disregard for the amenity of the neighbours.**

#### **5. CLIMATE CHANGE INITIATIVES (Purdon s.7.12, p.59)**

*“The principal opportunity for site planning controls to mitigate impacts of new development in relation to climate change is to identify the urban heat risk factors that apply to the site and incorporate appropriate urban heat mitigation measures. This is achieved through a micro-climate assessment.”*

Purdon says: *“It is more appropriate that such activities are undertaken as part of the DA documentation. However, the indicative plans do ensure that the following measures can be readily achieved: ♣ Zero emissions buildings, such as all-electric buildings, ♣ Provision of electric vehicle charging infrastructure capacity ♣ Achieving high energy efficiency and water use efficiency performance. ♣ At least 30% of the site area is permeable ♣ 30% canopy cover ♣ Statutory WSUD compliance with on-site stormwater detention and re-use ♣ Natural ventilation to units ♣ Good solar access for residents”*

**But there are NO controls in the proposed rezoning to ‘CZ5’ that will ensure these desirable measures will be achieved. In particular, we note:**

- **There is NO mention of any proposed limit on site coverage in the ‘Supporting Report’**

‘Assessment Requirement’ 3 of the Residential Zones Policy is “a **maximum of 50%** of the original block area” in RZ5. There is NO requirement for site coverage in CZ5. In our view, RZ5 zoning is preferred.

- **There are NO relevant requirements for planting area and tree canopy cover in the proposed ‘CZ5’ zone**

There are provisions in the Residential Zones Specifications, ie. 25% of the block area in RZ5, but NOT the Commercial Zones Specifications.

**CONCLUSION:**

The ISCCC applauds the site “Master Plan’ layout with a large, central open space allowing deep rooted planting, but not the excessive height of the ‘western’ building in particular. We also support the Master Plan in restricting vehicular access to the Franklin Street frontage. However, we are concerned that these desirable features may not be realised with a ‘CZ5’ zoning, and consider that ‘RZ5’ would be more appropriate for this site.

Contacts: Richard Johnston and Tui Davidson via [info@isccc.org.au](mailto:info@isccc.org.au)

Colin Walters  
Chair ISCCC  
7 October 2024

**From:** [REDACTED]  
**To:** [Terrplan](#)  
**Subject:** ISCCC SUBMISSION ON DRAFT PLAN AMENDMENT B: FORREST – SECTION 19 BLOCK 9  
**Date:** Tuesday, 15 October 2024 12:58:10 PM

---

You don't often get email from [REDACTED]. [Learn why this is important](#)

**Caution:** This email originated from outside of the ACT Government. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Hello,

Regarding the above, as a resident of Forrest, I absolutely support the above submission. The potential height and shading of existing residents, plus loss of amenity, is deplorable. That this is even being considered is appalling. Walter Burley Griffin would be turning in his grave as it is a complete negation of the principles laid down for the suburb and the garden city as a whole.

Regards,

[REDACTED]  
[REDACTED]

## Comments on Draft Plan Amendment B – Forrest Section 19 Block 9

To: Territory Plan and Coordination Section of EPSDD

I am a member of the Forrest Residents Group. I wish to make the following comments about proposed rezoning of this block to CZ5 – Mixed Use:

1. The sole reason for this rezoning to CZ5 mixed use is to give the developer access to a zoning that would permit construction of a 7-storey residential apartment block on this site. There is not even a pretence of constructing a mixed use development as this zoning is intended for. The proposal should be denied on this ground alone.
2. The proposed 7-storey apartment block is completely out of alignment with the surrounding 1 and 2-storeyed residences in the adjacent RZ1 and RZ2 blocks. While increasing urban density is an objective of the current Territory Plan, there needs to be a reasonable transition from RZ1 and RZ2 to higher density developments. A 3 or 4 storey development would be a more suitable development on this site, given its adjacency to RZ1 residential blocks.
3. A 7 storey development, even with setbacks, would cast a shadow over residential properties on Dominion Circuit during winter as shown in the report by Purdon Planning, diminishing the residents' amenity. This is a consequence of constructing such a high development adjacent to RZ1 residential areas.

For these reasons I oppose the proposed CZ5 – Mixed Use rezoning and would advocate for a RZ zoning that is of 3-4 storeys maximum on this site. This would be consistent with both the proposed residential development and the surrounding neighbourhood.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

**From:** [REDACTED]  
**To:** [Terrplan](#)  
**Subject:** Objection to Draft Plan Amendment Rezoning of Forrest Section 19 Block 9  
**Date:** Sunday, 20 October 2024 4:20:52 PM

You don't often get email from [REDACTED]. [Learn why this is important](#)

**Caution:** This email originated from outside of the ACT Government. Do not click links or open attachments unless you recognise the sender and know the content is safe.

To Whom It May Concern,

I am writing to express my strong opposition to the proposed rezoning of Forrest Section 19 Block 9 from Commercial CZ6 Leisure and Accommodation to CZ5 - Mixed Use Zone. As a homeowner in Dominion Circuit, I have significant concerns about the impact this development will have on our neighborhood.

My key points of objection:

1. Incompatibility with existing neighborhood character:
  - Dominion Circuit is currently a quiet, residential street with historical significance.
  - The proposed high-rise development with 134 dwellings and commercial spaces is incongruous with the existing low-density, residential nature of the area.
2. Traffic and parking concerns:
  - The addition of 202 resident parking spaces and 34 visitor spaces will significantly increase traffic on Dominion Circuit.
  - This influx of vehicles will disrupt the current peaceful environment in what is a very quiet street and potentially create safety hazards for pedestrians and cyclists.
3. Precedent setting:
  - Approving this rezoning could set a dangerous precedent for similar high-density, mixed-use developments in other quiet residential areas.
  - This could lead to the gradual erosion of the unique character of our neighborhood.
4. Impact on property values and rates:
  - Residents have invested in this area due to its exclusive nature and quiet environment, paying very high rates as a result.
  - The introduction of a high-density, mixed-use development is likely to negatively impact property values and the overall desirability of the area.
5. Heritage considerations:
  - Dominion Circuit includes heritage-listed properties, including my own residence.
  - The proposed development may detract from the historical significance and aesthetic value of these heritage properties.
6. Quality of life:
  - The increase in population density and commercial activity will likely lead to increased noise levels, reduced privacy, and a general degradation of the quiet lifestyle that current residents enjoy and have specifically chosen.

In conclusion, I urge the planning authorities to reject this rezoning application. The

proposed development is fundamentally at odds with the existing character of Dominion Circuit and the wider Forrest area. It would irreversibly alter the nature of our neighborhood and set a concerning precedent for future developments.

I request that the current zoning be maintained to preserve the unique character, heritage value, and quality of life that makes our neighborhood special.

Your sincerely

██████████

**From:** [REDACTED]  
**To:** [Terrplan](#)  
**Subject:** ISCCC Submission on Draft Plan Amendment B; Forrest - Section 19 Block 9  
**Date:** Sunday, 20 October 2024 10:35:18 PM  
**Attachments:** [ISCCC SUBMISSION ON DRAFT PLAN AMENDMENT B FORREST - SECTION 19 BLOCK 9.pdf](#)

---

You don't often get email from [REDACTED]. [Learn why this is important](#)

**Caution:** This email originated from outside of the ACT Government. Do not click links or open attachments unless you recognise the sender and know the content is safe.

To whom it may concern.

I wish to advise that as a long term resident, Chair of the Forest Residents Group (FRG) and [REDACTED]

[REDACTED], I fully support and agree with the ISCCC submission in connection with the Draft Plan Amendment B; Forrest – Section 19 Block 9.

I wish to be kept informed and welcome the opportunity to discuss any of the matters outlined in the attached ISCCC submission given the potential impact of any changes to the zoning of this area and any proposed developments for this area in which I am a resident.

Please acknowledge my correspondence in support of the ISCCC submission attached hereto.

Your sincerely,

[REDACTED]

## **DRAFT PLAN AMENDMENT B: FORREST – SECTION 19 BLOCK 9**

We are writing regarding the proposed rezoning on Section 19 Block 9, Forrest, being the site of the former Italo-Australian Club. We have received a copy of (and fully support) the submission made by the Inner South Canberra Community Council (ISCCC).

We note that the proposed new zoning is 'CZ5 – Mixed Use Zone', with a 23m building height limit, excluding plant room.

From our research, we have noted that the 23-metre height allowance would most likely represent 7 storeys above ground.

Having attended the Purdon consultation, we consider the consultation process flawed, misleading and inadequate. Issues raised by residents were largely dismissed, particularly in relation to building heights. Purdon provided a design that had building to only 3 levels above ground facing Dominion Circuit, but, when pressed, admitted that it was only an example of a development that could be built and that, when the rezoning was granted, they would be free to lodge a Development Application with a totally different design.

Examples to justify the height included the Doris Blackburn Building and other apartment complexes along Canberra Avenue.

None of the examples used approach the height of the proposed rezoning.

The Doris Blackburn has a basement and three stories above ground plus a plant room, and the residential buildings along Canberra Avenue (closest to Dominion and National Circuit) with more than four storeys tend to have lower heights to areas facing away from Canberra Avenue looking into the suburb, and none of these blocks are taller than 6 storeys or have rooftop plant rooms. This effect is increased by the natural ground level rising fairly steeply as you up move up Dominion Circuit and National Circuit. This means that the proposed rezoning to 23m excluding plant room would allow buildings to be much higher and more prominent than the surrounding buildings.

The buildings along Canberra Avenue are on a major dual carriage road with a wide median strip, and are consistent with the practice across Canberra of having high-rise development restricted to wide transport corridors (or surrounding major town centres such as Woden and Belconnen), and stepping down in height moving further away from the corridors into the suburbs.

Not only is Section 19 bordered on three sides by single carriageway suburban roads with no median strip, it faces, on Dominion Circuit, single level detached houses and townhouses. Consistent with Dominion Circuit's role as a suburban street, there are no developments over 2 storeys above ground on the street. The same applies to National Circuit, the northern border of the Section.



**From:** [REDACTED]  
**To:** [Terrplan](#)  
**Cc:** [REDACTED]  
**Subject:** FW: Submission: Forrest Section 19, Block 9  
**Date:** Monday, 21 October 2024 8:44:50 AM  
**Attachments:** [image001.png](#)  
[image002.jpg](#)  
[Comment on Section 19 rezoning application.docx](#)

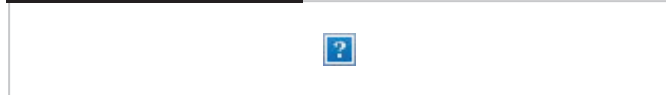
You don't often get email from [REDACTED]. [Learn why this is important](#)

**Caution:** This email originated from outside of the ACT Government. Do not click links or open attachments unless you recognise the sender and know the content is safe.

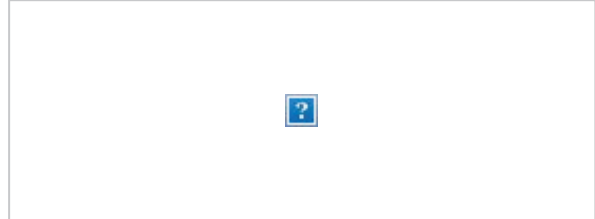
As residents of [REDACTED] Forrest who will be affected by what is built on this site, we unreservedly echo, and support submissions made below and by the South Canberra Community Council. There is no point in having Clayton style community consultation.

Regards

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]



*Please note that we will never send you an email changing our trust or office account details. Please contact us urgently if you receive an email from the practice purporting to change payment details.*



**From:** [REDACTED]  
**Sent:** Monday, 21 October 2024 12:21 AM  
**To:** terrplan@act.gov.au  
**Cc:** [REDACTED]  
[REDACTED]

**Subject:** Submission: Forrest Section 19, Block 9

Territory Planning

Please find attached our submission on the draft plan amendment for Forrest Section 19, Block 9.

Regards

[REDACTED]

**From:** [REDACTED]  
**To:** [Terrplan](#)  
**Cc:** [REDACTED]  
**Subject:** Draft Plan Amendment B - Section 19 Block 9  
**Date:** Monday, 21 October 2024 9:03:46 AM

You don't often get email from [REDACTED]. [Learn why this is important](#)

**Caution:** This email originated from outside of the ACT Government. Do not click links or open attachments unless you recognise the sender and know the content is safe.

As the two residential lessees in [REDACTED] located directly opposite [REDACTED], we wish to make the following comments regarding this draft plan amendment.

- Rezoning Block 9 to allow residential development is welcome as this would be more compatible with existing surrounding land uses than a hotel, as originally proposed.
- An existing condition of the proposed draft plan amendment is a building height limit of 23 meters. This height limit condition should also stipulate that any development of Block 9 does not overshadow residences in Dominion Circuit – which would happen if the indicative development described in the supporting report from Purdon were to proceed unaltered.
- An additional condition of approving the proposed plan amendment should be added to stipulate that any development on Block 9 be consistent with the planning principles for Section 19 of Forrest detailed by the ACT Government in its ***Inner South District Strategy***. The Purdon supporting report details these planning principles at pages 24 and 25. The District Strategy's Forrest Section 19 principles clearly state that access to the blocks on Section 19 should be by existing driveways and specifically state that access to Block 9 from Dominion Circuit should be avoided. Despite these clear principles, the Purdon report proposes that waste and good vehicles would have access to Block 9 via a new driveway on Dominion Circuit (see page 17). It would be reasonable in a new development to alter the positioning along Franklin Street of the existing driveways to Block 9. However, the creation of a new driveway to Block 9 in Dominion Circuit is not reasonable and would be demonstrably inconsistent with the planning principles of the ***Inner South District Strategy***.

[REDACTED]  
[REDACTED]  
[REDACTED]

**From:** [REDACTED]  
**To:** [Terrplan](#)  
**Cc:** ["ISCCC Chairperson"](#)  
**Subject:** Draft Plan Amendment B: Forrest Section 19 Block 9  
**Date:** Monday, 21 October 2024 10:33:23 AM  
**Attachments:** [ISCCC SUBMISSION ON DRAFT PLAN AMENDMENT B FORREST - SECTION 19 BLOCK 9.pdf](#)

---

You don't often get email from [REDACTED]. [Learn why this is important](#)

**Caution:** This email originated from outside of the ACT Government. Do not click links or open attachments unless you recognise the sender and know the content is safe.

**To: Territory Plan and Coordination Section EPSDD**

**Draft Plan Amendment B: Forrest Section 19 Block 9**

On the 13<sup>th</sup> September 2024 I received a letter on public consultation for a draft plan amendment B – Forrest Section 19 Block 9. I wish to advise my full support to the ISCCC submission by Colin Walters on 7 October 2024 attached.

As a resident of [REDACTED]  
[REDACTED] I add further comments below

I am concerned at the “spot” rezoning of the single site of Block 9, rather than a whole of section strategic plan for future redevelopment, plus the inevitable flow on to the adjacent Section 12.

The site is not in immediate proximity to other services, proposed transport, light rail; rather it is amidst one and two storey Forrest suburbia, including two large heritage listed areas plus individual building heritage listings.. Forrest is in fact one of very few suburbs which doesn't have a shopping/services area.

The immediate neighbourhood on Franklin Street which is NCA controlled is currently 2-4 story office blocks, adjoining Canberra Avenue.. Rather than the proposed 23 metres excluding plant room, any development on this Section/s should be transitioning/stepping down to the suburban environment not increasing height. It should be sympathetic with the ambience and nature of Forrest. This area is visible from Parliament House and NCA consultation and consideration should be a requirement. The Griffin Plan suggests District Strategies reinforce.....Canberra's role as National Capital. It also refers to protecting landscape, vistas and views.

There is no reference to density and associated parking and traffic implications. Construction on Block 9 will in effect lose some 200 parking spaces that have temporarily been provided on the Italo Australian Club site, used by commuting employees in the Forrest/Barton area. The pressure on traffic and parking in this area was hidden during Covid with home based work but is now steadily returning to pre-2020 levels. Interestingly during the appeal on an earlier DA for Block 9, it was shown that National Circuit/Canberra Avenue traffic light intersection was over capacity. Access to Block 9 should be restricted

to Frankiln Street to avoid increased traffic on the suburban Dominion Circuit and avoid pressure on the Dominion Circuit/Canberra Ave intersection which does not have traffic lights or divert this traffic to National Circuit, further exacerbating that intersection.

[REDACTED]

[REDACTED] These townhouses have progressively been upgraded to provide environmentally sustainable living both for aging in place and for young families. A 23 metre construction threatens the ambience and value of these properties. Being on the same suburban block as the proposed rezoning we will inevitably be caught up in precedents and domino effects as development creeps up this suburban block. Similarly the bowling club (Section 12), and the tennis club and church on Section 19 may well be encouraged by developers to sell and relocate reducing the community amenity of the neighbourhood.

Carefully considered principles that reflect the ambience, heritage and nature of Forrest including height, density, land use, parking, traffic, noise, solar access could provide an opportunity to do a compatible and sympathetic redevelopment rather than an isolated rezoning..

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

**From:** [REDACTED]  
**To:** [Terrplan](#)  
**Subject:** Draft Plan Amendment B – Forrest Section 19, Block 9  
**Date:** Monday, 21 October 2024 1:51:33 PM

---

You don't often get email from [REDACTED]. [Learn why this is important](#)

**Caution:** This email originated from outside of the ACT Government. Do not click links or open attachments unless you recognise the sender and know the content is safe.

The Territory Plan & Coordination Section

Environment, Planning and Sustainable Development Directorate

As a long time [REDACTED] I would like to make a comment about the Draft Plan Amendment B - Forrest Section 19, Block 9.

One of the joys of living in this area is the expansive and pleasant nature of the suburb enhanced by beautiful street scapes and wonderful tree cover. At present we are not overwhelmed by apartments reaching ever taller as is happening elsewhere in Canberra.

This application is one street back from Canberra Ave in a residential area of one and two storey dwellings. This proposed seven floor building will dominate the street and surrounding area. The building will probably be the first building in what will then be a series of totally inappropriately large buildings with the result that what was once a calm and beautiful part of Canberra will be forever degraded.

I support the submission from the ISCCC.

Sincerely,

[REDACTED]

**From:** [REDACTED]  
**To:** [Terrplan](#)  
**Subject:** DRAFT PLAN AMENDMENT B: FORREST – SECTION 19 BLOCK 9 - Community Concerns  
**Date:** Monday, 21 October 2024 6:05:36 PM  
**Attachments:** [ISCCC SUBMISSION ON DRAFT PLAN AMENDMENT B FORREST - SECTION 19 BLOCK 9.pdf](#)

---

You don't often get email from [REDACTED]. [Learn why this is important](#)

**Caution:** This email originated from outside of the ACT Government. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear Sir/Madam,

I am writing to support the objections raised by the ISCCC in their submission on Oct 7 2024.

The proposed building [REDACTED], although I will not be directly impacted by such a large and imposing structure as is being proposed, it adds to the residential/commercial attrition and residential infilling occurring in this historic suburb.

I understand the need for development and for inner-city infilling but it should be done in keeping, whether heritage listed or not and with consideration for the other dwellings surrounding it.

Regards,

[REDACTED]

**From:** [REDACTED]  
**To:** [Terrplan](#)  
**Subject:** SUBMISSION ON DRAFT PLAN AMENDMENT B: FORREST – SECTION 19 BLOCK 9  
**Date:** Monday, 21 October 2024 9:36:35 PM

---

You don't often get email from [REDACTED]. [Learn why this is important](#)

**Caution:** This email originated from outside of the ACT Government. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Hello

Please see my below comments on:

DRAFT PLAN AMENDMENT B: FORREST – SECTION 19 BLOCK 9

I oppose the proposed amendments.

I live [REDACTED]

[REDACTED]. I did not receive any notification of the proposed amendment.

The previous proposal of seven storeys was unacceptable to the community the first time and this remains extant.

A proposal of the height is not within the character of the area and out of keeping with current zoning away from Canberra Ave. It is nowhere near a group centre or transport hub.

The zoning is currently for leisure and accommodation- with increased density it is important that sites zoned for leisure are protected especially in the inner south with several already lost and multiple organisations all seeking similar amendments.

I also support the more detailed submissions made by the ISCCC and Forrest Residents Group and also call for better publicity of significant changes to the community.

Kind regards

[REDACTED]

ACT Planning and Land Authority  
[By electronic submission]

21 October 2024

To whom it may concern

## Submission on Draft Plan Amendment B - Forrest Section 19 Block 9

Greater Canberra welcomes the opportunity to participate in this consultation process.

Greater Canberra **supports** the Draft Territory Plan Amendment.

Some of our members, who are Inner South residents, attended the original consultation sessions for this territory plan amendment in 2021. We support this amendment now for the reasons we did then - that this amendment will provide much needed housing and services in the centre of Canberra.

We note that this site is currently a surface car park, and virtually any alternative land use would be preferable for social, economic and environmental objectives.

We agree with the draft major territory plan amendment as circulated for consultation that the draft amendment is consistent with the *Planning Strategy*, *Inner South District Strategy*, and the *Statement of Planning Priorities* as detailed in the Draft Territory Plan Amendment.

We additionally note that this Draft Territory Plan Amendment is aligned with the Principles of Good Planning articulated in the *Planning Act 2023*, particularly the activation and liveability principles, housing affordability principles, long term focus principles, natural environment conservation principles, and urban regeneration principles.

### About Greater Canberra

Greater Canberra is a community organisation that advocates for a more liveable, sustainable and affordable Canberra. We believe that forward-thinking urban planning and the encouragement of connected medium density communities is vital to ensure that future Canberrans can enjoy social and economic equality and a high quality of life.

Our members come from all over Canberra, and from a variety of backgrounds - both renters and homeowners, from different stages of life, different levels of wealth, and different occupational and professional backgrounds.

Questions on the submission can be sent to [greatercanberra@gmail.com](mailto:greatercanberra@gmail.com).

-

**From:** [REDACTED]  
**To:** [Terrplan](#)  
**Subject:** Fwd: Submission: Forrest Section 19, Block 9  
**Date:** Thursday, 24 October 2024 4:21:04 PM  
**Attachments:** [Comment on Section 19 rezoning application.docx](#)  
[Comment on Section 19 rezoning application.docx](#)

---

You don't often get email from [REDACTED]. [Learn why this is important](#)

**Caution:** This email originated from outside of the ACT Government. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Good morning,

In relation to the proposed development of Forrest Section 19, Block 9 - I wholeheartedly endorse the response provided in the attached.

I am currently travelling and only have access to my phone - hence my submission is represented through the attached submission and is in full support in all of the issues raised.

[REDACTED]

Sent from my iPhone

Begin forwarded message:

---

**From:** [REDACTED]  
**Sent:** Monday, 21 October 2024 12:21 AM  
**To:** terrplan@act.gov.au  
**Cc:** [REDACTED]  
[REDACTED]  
[REDACTED]  
**Subject:** Submission: Forrest Section 19, Block 9

Territory Planning

Please find attached our submission on the draft plan amendment for Forrest Section 19, Block 9.

Regards

[REDACTED]

SUBMISSION TO THE ACT GOVERNMENT RE MAJOR PLAN AMENDMENTS TO  
TERRITORY PLAN B

## FORREST SECTION 19 BLOCKS 5, 6, 9, 11,12

The proposed amendments to Section 19 of Forrest, represent a grossly inappropriate proposal, which if approved, would lead to a development totally incompatible with the essence of Forrest in terms of scale, height, form and environment.

The impact on existing Dominion Circuit residents would be negative and substantial, and proposal of 7 stories plus plant (totalling approx. 24m) would adversely impact on the amenity of existing residences well beyond Dominion and would undoubtedly be used as a template for further 7 storey/high rise developments in Section 19 and potentially other parts of Forrest.

The concept that the height of the tree canopy can be used as a basis for the maximum height of the building is fallacious. The canopy is important, particularly in terms of its cooling effect on residences. But if the building is the same height as the tree canopy, there is zero cooling from the canopy. Indeed, the building will serve as a heat island in the middle of Forrest!

The proposal is incompatible with the adjacent Canberra Avenue height limits of 3-4 stories, which provides an effective traffic sound barrier for adjacent areas of Forrest. The normal and sensible planning approach (and applied to Canberra Avenue) is that there is a transition or 'step down' from say a 4 storey office or apartment building to 1-2 story residential areas. In this proposal, there is a "step up" from the existing 4 storey office block (Doris Blackburn Building) on Canberra Ave/Franklin Street to 7 storey in the proposal and then to 1-2 story residences opposite in Section 20 and in the western part of section 19 and the adjacent section 12. No transition whatsoever: 7 storey to 1 storey!

Additionally, the issues relating to noise and traffic receive no mention. Directly opposite the proposed 7 storey development is aged accommodation and adjacent to that are family residences which would inevitably be subjected to greatly increased traffic and noise, potentially extending far into the night if a hotel were to be included in the development in the future

The proposal as it stands does not appear to address a residential need in the area, in that the new Manuka multi-storey apartment developments on Captain Cook Crescent have been very slow to sell, with many unoccupied apartments at this time. Nor is there an obvious need for hotel accommodation, in view of the nearby new Manuka hotel. Conversely, the proposal does nothing to address the much discussed and much needed "missing middle" such as townhouses.

In all, this an inappropriate, poorly conceived proposal that will inevitably lead to massive over-scale development of most of Section 19 and perhaps beyond. It should be rejected as it stands and scaled down to a height (3 story's or less) that is compatible with the amenity of Forrest, aim at the 'missing middle' and maintain and enhance the unique, historic and much valued aesthetic and environmental qualities of Forrest.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

**From:** [REDACTED]  
**To:** [Terrplan](#)  
**Subject:** Revised DPA-B: Forrest (Block 5, 6, 9, 11, 12, Section 19)  
**Date:** Monday, 17 March 2025 12:39:45 AM

You don't often get email from [REDACTED]. [Learn why this is important](#)

**Caution:** This email originated from outside of the ACT Government. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Territory Plan and Coordination Section, EPSDD (480 NBA)

Access Canberra Building Services Shopfront

Re: Revised DPA-B (Block 5, 6, 9, 11, 12, Section 19)

Dear Territory Plan & Coordination Section,

As a family with young children living in [REDACTED], we strongly support the Major Plan Amendment.

We need more housing in convenient Canberra locations. This amendment will help provide us with accessible homes while keeping the Forrest community vibrant and evolving to meet the demands of a growing Canberra.

Creating more housing in Forrest, close to schools, parks and the Barton office precinct, makes life easier for families like ours. It encourages outdoor activities and strengthens intergenerational community ties. Plus, it's better for the environment. Compact living reduces our carbon footprint and promotes sustainable practices. This plan will lead to growth and prosperity for our neighborhood.

I also want to emphasise that the Inner South Canberra Community Council or Forrest Residents Group do not speak for me or our family. All voices matter, and we fully support the proposed plan.

I urge you to prioritise this amendment for the future of our growing Canberra.

Thank you for your attention.

Best regards

[REDACTED]

[REDACTED]

[REDACTED]

ACT Planning and Land Authority  
[By electronic submission]

22 April 2025

To whom it may concern

## Submission on Revised Draft Plan Amendment B – Forrest Section 19 Blocks 5, 6, 9, 11 and 12

Greater Canberra welcomes the opportunity to participate in this consultation process.

Greater Canberra **supports** the revised Draft Territory Plan Amendment.

Some of our members, who are Inner South residents, attended the original consultation sessions for this Territory Plan amendment in 2021. We support this amendment now for the reasons we did then - that this amendment will provide much needed housing and services in the centre of Canberra.

We note that this site is currently a surface car park, and virtually any alternative land use would be preferable for social, economic and environmental objectives.

We agree with the revised draft major territory plan amendment as circulated for consultation that the revised draft amendment is consistent with the *Planning Strategy, Inner South District Strategy*, and the *Statement of Planning Priorities* as detailed in the Draft Territory Plan Amendment. We approve of Blocks 5, 6, 11 and 12 being added to the site for the proposed rezoning to CZ5 Mixed Use. This more comprehensive upzoning will promote housing availability with convenient access to transport, services and employment centres.

We additionally note that this revised Draft Territory Plan Amendment is aligned with the Principles of Good Planning articulated in the *Planning Act 2023*, particularly the activation and liveability principles, housing affordability principles, long term focus principles, natural environment conservation principles, and urban regeneration principles.

### About Greater Canberra

Greater Canberra is a community organisation that advocates for a more liveable, sustainable and affordable Canberra. We believe that forward-thinking urban planning and the encouragement of connected medium density communities is vital to ensure that future Canberrans can enjoy social and economic equality and a high quality of life.

Our members come from all over Canberra, and from a variety of backgrounds - both renters and homeowners, from different stages of life, different levels of wealth, and different occupational and professional backgrounds.

Questions on the submission can be sent to [greatercanberra@gmail.com](mailto:greatercanberra@gmail.com).

**From:** [REDACTED]  
**To:** [Terrplan](#)  
**Cc:** [REDACTED]  
**Subject:** Revised Draft Plan Amendment B Forrest Section 19, Blocks 5,6,9,11 and 12  
**Date:** Wednesday, 23 April 2025 4:36:00 PM

---

You don't often get email from [REDACTED] [Learn why this is important](#)

**Caution:** This email originated from outside of the ACT Government. Do not click links or open attachments unless you recognise the sender and know the content is safe.

We strongly object to the proposed rezoning of the blocks to CommercialCZ5 Mixed Use. In particular we strongly object to any change to the Inner South District Policy that would change the seven storey height limit and vehicle access to Dominion Circuit. Any changes to the height limit will impact local residents such as us and take away our winter sun and impact our ability to enjoy our amenity and lifestyle. Traffic along Canberra Avenue and Dominion Circuit is already busy and congested at peak times.

Let's hope democracy prevails over money and vested interests.

[REDACTED]  
[REDACTED]  
[REDACTED]

**From:** [REDACTED]  
**To:** [Terrplan](#)  
**Cc:** [REDACTED]  
**Subject:** Revised Draft Plan Amendment B - Section 19 Forrest  
**Date:** Friday, 25 April 2025 11:05:29 AM

---

**Caution:** This email originated from outside of the ACT Government. Do not click links or open attachments unless you recognise the sender and know the content is safe.

[REDACTED]  
[REDACTED] we wish to make the following comments regarding this revised draft plan amendment.

The proposed incorporation of key elements of the Inner South District Strategy into the Inner South District Policy designed to limit the adverse impacts of any new development of Section 19 on Dominion Circuit residents is welcome and supported.

The proposed seven story height allowance for Section 19 is considered inappropriate on the grounds that it would permit development that is inconsistent with the neighbourhood character and it would also result in both an unacceptable loss of amenity for surrounding residents and exacerbate the already severe traffic parking congestion in the surrounding streets.

**To minimise these adverse outcomes a height limit of four stories across the entirety of Section 19 is proposed for the reasons detailed below.**

- The revised Draft Plan Amendment document states in part at page 9 that the intention is to “*conserve the existing qualities of the suburb of Forrest and respect the neighbourhood character surrounding Section 19*”. Seven stories are inconsistent with that objective. The proposed adoption of a seven story allowance appears to have been based on the fact that the supporting report submitted in respect of rezoning Block 9 referred to a previously approved seven story hotel development for that site, that was never built. It is however important to note that in 2017 the proponents for that hotel development argued in ACAT (when the proposal was appealed) that the distinctive design of the building with a clover leaf footprint meant that its impact would be minimised as its setbacks varied and were as deep as 20 meters. The proponents also argued that the height was suitable as this would create a transition to lower development heights in the rest of Section 19.
- The supporting report for Block 9 envisages between 130 and 140 apartments. The supporting report for Blocks 5, 6 and 11 envisages 237 units. Development with this sort of density on Section 19 would have unacceptable impacts on amenity and increase an already severe parking shortage in surrounding streets. As it is, Block 9 which is around 5,000 square meters is currently used in its entirety as a car park and is heavily patronised on work days. The loss of these parking spaces, together with the additional vehicles traffic movements and parking requirements generated by development across Section 19 can only make an already persistently serious problem worse.

[REDACTED]  
[REDACTED]



**Submission on Revised Draft Plan Amendment B – Forrest Section 19 Blocks 5,6,9,11,12 ('the proposal').**

The key focus of this submission is on ensuring adequate publicly accessible green space (ie green space that available to all people, not just residents of a specific development) and good solar access to the same and other areas of public use such as footpaths.

I support increasing the number of people residing in inner areas of Canberra.

However, I recommend that the proposal should not proceed without further amendment because it will materially increase the number of people living in the area:

- (a) without providing any increase the amount of publicly accessible green space that is available for existing and/or new residents; and
- (b) decrease the solar access to existing footpaths making them less attractive and more dangerous to use for active travel.

In my view, the relevant planning authorities must take a medium to long term view to the stated policy of increasing residential density. Unless each re-development makes an appropriate contribution towards increasing the amount of publicly accessible green space amenity in the local area will decline over time for both existing and new residents.

Not to require each development to contribute towards increasing the amount of publicly accessible green space would be akin to progressively approving (without any park areas) a new suburb as residents moved in.

While the reduction in amenity may not be significant in the short term, the amount of infill that will occur in the short term would not meet the Plan's broader objectives of markedly increasing density so the process will not stop with the current proposal regarding Section 19.

It is perfectly understandable that proponent(s) for each redevelopment (including the current proposal) want 'their' amendment approved without them making any contribution towards increasing the amount of public open space. Each amendment separately may not have a large (although the current proposal is silent on the number of new residents) detrimental impact on amenity. However, the cumulative impact of sequential re-development will be significantly detrimental unless each re-development is required to contribute towards ensuring sufficient publicly accessible green space for all of people who will eventually live in the area.

Not only is it necessary, but it is also equitable – since otherwise re-developments that occur first are likely to make little or no contribution while re-developments that occur later (after the problems are obvious) will have to make a relatively larger contribution.

*The most straight forward and transparent way to ensure an appropriate contribution from each re-development is for each variation to the Territory Plan to require part of the re-zoned area to be set aside as green space for public use – akin to a suburban park. The inner south already has at least one example of reasonable re-development that includes public open space within its immediate area ie ‘The Parks’ in Red Hill. ‘The Parks’ also provides a reasonable example of a mix of building heights etc.*

Similar issues arise with the current proposal’s detrimental impact on solar access to existing footpaths. These detrimental impacts are shown by the proponent’s shadow diagrams.

Currently, people (residents and other persons using the footpaths) are largely able to walk in the sun during winter. This increases their well-being including safety – for example, not slipping on frost and ice.

The proposal (by its own admission) will markedly increase shadowing of adjacent footpaths (indeed the footpath on the northern side of the street will not receive any sunlight).

So, the proposal will markedly increase the number of people living the area but concurrently reduce the amenity of their local footpath. Clearly inconsistent, and detrimental to encouraging active travel, reduced use of private motor vehicles, etc.

*I suggest the building heights be adjusted to ensure solar access to existing and prospective footpaths.*

I am prepared to discuss these matters,

██████████

3 May 2025.

**Submission on Draft Major Plan Amendment March 2025– Forrest Section 19  
Blocks 5,6,9,11,12**

In Summary, I would propose that the maximum allowable building height should be that as applies in RZ4, that is 12.5 meters.

-----

The Amendment proposes rezoning from Commercial CZ6 and Residential RZ1 to Commercial CZ5 Mixed Use.

Section 19 Forrest is identified in the Inner South District Strategy as a Key Site, and the Strategy also states that a full investigation of planning, environmental, infrastructure and traffic issues should be undertaken (including transport planning and modelling) should be undertaken when considering changes.

In keeping with that Strategy, the proposed Amendment identifies a number of changes to the Inner South District Policy, including the following Assessment Requirements

- Limit driveways on Dominion Circuit for Blocks 5 and 6 to existing locations.
- Limit shop selling food to 250m<sup>2</sup>
- Limit building height on the site to 7 storeys, excluding plant room.
- Provide suitable landscaping to the Dominion Circuit frontage to reflect the residential character opposite.

The proposed rezoning to CZ5 allows for a broader range of activities than if the whole site was rezoned Residential. But CZ5 does not have any height restrictions as Assessment Requirements. The Amendment proposes 7 stories, without any justification other than someone has proposed 10 stories.

If, as an exercise, we assume the Section were to be rezoned residential, it would appear that RZ4 would be the most suitable zoning. As the Residential Zones Policy indicates

**RZ4 – Medium Density Residential Zone**

1. Facilitate development or redevelopment of sites to achieve a distinctively medium density housing character in a manner that demonstrates design excellence.
2. Provide for a range of housing choices where the housing contains a mix of single dwelling and multi-unit housing.
3. Provide opportunities for redevelopment by enabling changes to residential density and the original pattern of subdivision.
4. Provide opportunities for redevelopment by enabling change.

RZ4 has an Assessment Requirement of maximum building height of 12.5 meters.

I would argue that, even if rezoning to CZ5 takes place, the overall characteristic of

development should be broadly that of RZ4- Medium Density development-on the basis that

- The site is bounded on one side by RZ2 developments (Dominium Circuit); the transition to RZ4 level developments provides a more coherent transition to higher density
- Similarly, the site is also bounded by the Forrest Primary School, which is otherwise boarded by low-rise development, and townhouses to the west.
- The impact of issues such as overshadowing , privacy , traffic, parking will be reduced, thus maintaining , to some degree, the amenity of existing occupants
- Seven story development may have implications for sightlines to Parliament House; this would need to be investigated in detail, but RZ4 equivalent development would be consistent with developments surrounding Parliament house.

The Inner South District Policy indicates, inter alia, for the site

‘(ii) Buildings are no higher than the established tree canopy along main avenues with primarily landscaped frontages.’

Presumably this requirement embodies an image of buildings nestled into the treescape, rather than dominating. This image is very much one which reflects the Inner South.

While this requirement is open to interpretation, it is difficult to see how a permitted height of 7 stories would satisfy it. Trees around the site are of varying heights, different varieties and ages. Many may need replacement in the future.

In short, seven story buildings on the site would be uniquely out of character with residential and commercial buildings in the surrounding Inner south.

**To Whom It May Concern,**

**Re: Revised Draft Plan Amendment B – (DPA-B) Forrest Section 19 Blocks 5, 6, 9, 11 and 12 rezoning from Commercial CZ6 and Residential RZ1 to Commercial CZ5 Mixed Use.**

We are writing to express our strong opposition to the proposed rezoning of Forrest Section 19 Blocks 5, 6, 9, 11 and 12 from Zone CZ6 and Residential RZ1 to Commercial CZ5 Mixed Use.

We note that the timeframe for consultation is extraordinarily short, in the context of a radical change proposed to the zoning in a well-established, heritage-significant suburb.

We have fundamental concerns about the impact that, if it proceeds, development allowed within CZ5 zoning would have on our neighbourhood.

Our most serious concern about the rezoning in Section 19 Forrest is that it would allow developers to build manifestly excessively tall buildings and create far higher population density than can be accommodated by the adjoining roads, overshadowing neighbouring properties and fundamentally changing the character of the suburb.

An example of this is the related proposal to build a 7-storey development with over 150 units on the former Italo-Australian Club site on block 9, completely at odds with the suburban context and considerably taller than any existing buildings nearby (flanked by one or two storey homes/townhouses and a 4 storey office block).

The change of zoning proposed for the Albany apartments and the Blandford apartments is radical: going from RZ1 restricted to 2 storeys to CZ5 with a 7-10 storey height limit. Owners such as ourselves purchased properties opposite these blocks with the understanding (as used to be the case) that RZ1 was only rezoned in exceptional circumstances, and that there was some surety of retaining the privacy, solar access, limited traffic and noise and outlook from the buildings opposite remaining at their current height (even if redeveloped). The new planning arrangements and the proposal clearly reverse this.

While, by the width of National Circuit to the north and Franklin Street to the East, Section 19 Forrest falls outside of NCA jurisdiction, clearly it would be inappropriate to have a radically different streetscape with prominent high-rise buildings bordering the NCA areas, impacting the vista from Parliament House. Similarly, the NCA has height restrictions for development on Canberra Avenue to preserve an appropriate vista from Parliament House down the avenue. Again, having high-rise only one block back from Canberra Avenue would impact this significantly and would operate squarely against the spirit of the NCA development restrictions.

National Circuit also has the Forrest Primary School very close to the proposed Section 19 development, and there would be significantly increased danger to the children from increased traffic from a vast increase in population density.

It should be noted that, even in the newer suburbs such as those in the Molonglo Valley and in Gunghalin, high-rise development is restricted to the town centres and major transport corridors, with building height stepping down from 6 or more floors on the main routes, to 3 or 4 adjoining, to 2 in the broader suburb.

This should be a principle applied universally across Canberra, and particularly to Section 19 Forrest, where any other alternative would not only impact on the Garden City model for the suburb (much of which is heritage listed), but also adversely impact the view from Parliament House.

It should also be noted that the other areas of proposed high-rise development in the territory plans are all adjoining shopping centres or along major transport corridors. This is not the case with Section 19: it is several hundred metres from any shops, with the area between the shops and Section 19 taken up with one or two storey dwellings/townhouses. Similarly, it is at odds with proximity to the proposed light rail, as it will also be at least three hundred metres from any stop.

Neither National Circuit nor Dominion Circuit are particularly wide streets, and both are already heavily used already for parking by workers from nearby office buildings, forcing cars close to or over the centre lines to pass. They are already increasingly being used as an alternative to the congested Canberra Avenue with cars travelling through the suburb as an alternative. Dense development on Section 19 would worsen an already significant problem, leaving the roads unworkably choked.

Added to this, the corner of Dominion Circuit and Hobart Avenue is already an accident 'black spot' with significant crashes seemingly a monthly occurrence. Adding hundreds of cars to the surrounding roads would make this serious problem much worse.

The redevelopment of the Italo-Australian club site will remove roughly 200 parking spaces, forcing even more cars into off-street parking. The addition of extra traffic if there is high-rise development on Section 19 would make this considerably worse, even with the proposed 'principle' of no new vehicle access from Block 9 of Section 19 to Dominion Circuit.

In summary, all of this can, and should, be addressed by applying, as a key principle, building height restrictions stepping down from the 5 storeys on Canberra Avenue, to 3 storeys adjoining (ie Blocks 9 and 12) to 2 storeys on Blocks 5, 6 and 11 in Section 19. By doing this, it would provide certainty both to residents and developers, and deliver development compatible with the existing suburban context.

We note that the excessive height dimension of the Section 19 Forrest proposal is at odds with a number of the overarching Territory Plan Planning Principles (at Part C), specifically that:

- 2.1 (e) Policies should support and enhance the quality of life and wellbeing of residents.
- 2.2 (a) Planning and design should promote the unique cultural heritage of the ACT by acknowledging established heritage significance in design and placemaking.
  - (b) Development should—
    - (i) respect local heritage
    - (ii) avoid direct impacts on heritage or, if a direct impact is unavoidable, ensure the impact is justifiable and proportionate.
- 2.3 (a) Development should be focussed on people and designed to—
  - (i) reflect local setting and context

(ii) have a distinctive identity that responds to the existing character of its locality

We further note that the proposal also contradicts Chief Minister Barr's specific comments from July 2022, where he stated:

"The answer is not just more 10-storey apartments in town centres and CBDs, although there's still a little bit more capacity and demand for them, but the bulk of the new housing will be in what I'd call that middle sphere. So lower-density apartments, more like walk-up two- and three-storey and in townhouses, row houses, duplexes, that sort of housing density."

Section 19 would be ideal for this. 2-3 storey townhouses could be built profitably without increasing population and traffic density to unsustainable levels.

In summary, although we acknowledge that increasing population density in the inner south has benefits and that some development on Section 19 is appropriate, it should be done in a way that is concordant with the suburbs where it is proposed, and only where the surrounding road infrastructure is able to support it.

We ask that you reject the proposal to rezone Section 19.

Regards

[Redacted signature block]



## Inner South Canberra Community Council

**To: Territory Plan & Coordination Section EPSDD**  
([terrplan@act.gov.au](mailto:terrplan@act.gov.au))

### **DRAFT PLAN AMENDMENT B (REVISED MARCH 2025):** **FORREST – SECTION 19**

#### **COMMENTS BY INNER SOUTH CANBERRA COMMUNITY COUNCIL (ISCCC)**

Thank you for advising the ISCCC about this Revised Draft Major Plan Amendment. As you know the ISCCC provided comments (our letter 7 October 2024) on the original draft raising a number of substantive concerns about it. It is therefore very disappointing that the Revised Draft makes no significant response to our concerns.

**The ISCCC does NOT support this Revised Draft Plan Amendment, for the reasons set out below** (in the same format as our earlier comments).

#### **1. PRIOR CONSULTATION**

This Draft Plan Amendment continues to be a totally inadequate response to the earlier community feedback and fails to address the substantive concerns raised.

#### **2. SECTION MASTER PLAN**

The ISCCC proposed that a whole section Master Plan would be very beneficial in setting the parameters for future redevelopment of Section 19 Forrest. However, all that the Revised Draft Plan Amendment does is to extend the 'CZ5-Mixed Use' zone, formerly proposed to apply only to Block 9, to include Blocks 5,6,11 &12 as well. This does not exhibit any of the thoughtful and sensitive approach to rezoning that we would have hoped to see in a proper Section Master Planning exercise.

#### **3. ALTERNATIVE RESIDENTIAL ZONES**

The ISCCC proposed that the more appropriate zoning for blocks fronting Dominion Circuit would be *Residential*, rather than *Commercial - Mixed Use*. This was based on advice that the redevelopment proposal for Block 9 would be purely residential and because the blocks on the south side of Dominion Circuit were all Residential – 'RZ2'. We noted that the *Residential Zones Specifications 2024 (14.1(d)(i))* would limit the building height in RZ5 zones to 3 storeys, *within 50m of the boundaries of blocks in RZ1, RZ2 or RZ3*, and otherwise to no more than 6 storeys. It is the view of the ISCCC that '*Residential: RZ5*' is the appropriate zoning for Blocks 5,6 & 9. In our view '*Commercial: CZ5 – Mixed Use*' is not appropriate for these blocks as it

would permit commercial uses to the Dominion Circuit frontage as well as excessive building heights along this frontage with substantial adverse impacts on the amenity of the residences opposite.

#### 4. OVERSHADOWING

As the ISCCC noted in its previous comments, the proposed ‘Commercial: CZ5 – Mixed Use’ zoning would permit significant overshadowing of adjacent residential development, caused by the proposed buildings up to 7 storeys high on Block 9. Similarly, there would inevitably be significant actual or perceived overlooking from the proposed buildings. This is highly inappropriate and shows a complete disregard for the amenity of the neighbours.

#### 5. CLIMATE CHANGE INITIATIVES

The Purdon report with the original Draft Amendment stated: “*The principal opportunity for site planning controls to mitigate impacts of new development in relation to climate change is to identify the urban heat risk factors that apply to the site and incorporate appropriate urban heat mitigation measures. This is achieved through a micro-climate assessment.*”

But, as pointed out in the previous comments by the ISCCC, there are NO controls in the proposed rezoning to ‘Commercial: CZ5 – Mixed Use’ that will ensure these desirable measures will be achieved, through a *micro-climate assessment* or otherwise. In particular, we noted:

- There is NO limit on *site coverage* in the proposed ‘CZ5’ zone. ‘Assessment Requirement’ 3 of the *Residential Zones Policy* is “*a maximum of 50% of the original block area*” in ‘RZ5’.
- There are NO relevant requirements for *planting area* and *tree canopy cover* related to each block in the proposed ‘CZ5’ zone. The *Residential Zones Specifications* require a minimum of 25% of the *block area* in ‘RZ5’ for *planting area* and *tree canopy cover*.

#### CONCLUSION:

As previously, the ISCCC applauds the site “Master Plan’ layout (for Block 9) with a large, central open space which we assume allows deep rooted planting, but not the excessive height of the ‘western’ building in particular. We also support the Master Plan in restricting vehicular access to the Franklin Street frontage. However, we are concerned that these desirable features may not be realised with a ‘Commercial: CZ5 – Mixed Use’ zoning, and consider that ‘Residential: RZ5’ is more appropriate for Block 9, as well as Blocks 5 & 6.

Contacts: [REDACTED]

[REDACTED]  
[REDACTED]  
5 May 2025

## **Formal Submission: Objection to DPA-B Forrest Section 19 Rezoning**

**To Whom It May Concern,**

**Re: Revised Draft Plan Amendment B – (DPA-B) Forrest Section 19 Blocks 5, 6, 9, 11 and 12 rezoning from Commercial CZ6 and Residential RZ1 to Commercial CZ5 Mixed Use.**

I am writing to express my strong opposition to the proposed rezoning of Forrest Section 19 Blocks 5, 6, 9, 11 and 12 from Zone CZ6 and Residential RZ1 to Commercial CZ5 Mixed Use. As a homeowner in Dominion Circuit, I have significant concerns about the impact this development will have on our neighbourhood.

### **Current Site Usage**

I understand that the site subject to DPA-B contains the following blocks and uses:

- Block 5 - occupied by low-rise multi-unit residential buildings (Blandford Court - 29 Dominion Circuit is a 16 lot apartment building built in 2006) currently Zone RZ1 (suburban)
- Block 6 - contains a hotel and serviced apartments (Forrest Hotel and Serviced Apartments/Albany Apartments) currently Zone RZ1
- Block 9 – is used as a carpark (previously occupied by the Italo-Australian Club)
- Block 11 – contains 2-storey apartments (Forrest Hotel and Serviced Apartments/Albany Apartments) currently Zone CZ6 (leisure and accommodation)
- Block 12 – occupied by the Italian Cultural Centre (community activity centre)

While I acknowledge Canberra's housing challenges and support **appropriate** densification strategies, this dramatic rezoning from low-density, low-rise to high-density, high-rise, dual use development:

- Contradicts the established neighbourhood character
- Fails to meaningfully address affordable housing needs in the ACT due to its location
- Contravenes numerous established statutory guidelines
- Represents a poor urban planning outcome for Canberra
- Includes commercial uses which are not contributing to Canberra's housing challenges – the main rationale proposed for the need for rezoning.

Canberra's distinctive character and liveability depend on balanced decisions that serve community needs while demonstrating environmental responsibility. This proposal currently achieves neither objective.

## **Objection to Rezoning on Section 19: Government Failure to Adhere to Consultation Principles**

Before discussing my specific objections to the rezoning itself, I must address the Government's lack of compliance with its own Principles of Good Consultation as prescribed in the Australian Capital Territory Planning Act 2023, A2023-18, Republication No 7, Effective 3 April 2025.

The Act states:

(a) In undertaking consultation under this Act, a person **must** consider that consultation should be **accessible, balanced, inclusive, meaningful, resourced, respectful, timely, transparent and understandable**.

DPA-B represents a major amendment to the zoning of these blocks and will have considerable repercussions for current residents of Forrest. Yet, consultation has NOT been inclusive, meaningful, resourced, timely or transparent.

### **Inclusive**

Consultation is inclusive if it is undertaken in a way that engages **all** stakeholders directly affected by the subject of the consultation; and aims to engage all other stakeholders affected by the subject of the consultation.

This disruptive and distressing development impacts upon **all** residents of Forrest. As far as we can tell, only those who objected to the Block 9, Section 19 rezoning were invited to submit regarding DPA-B. The very first step in including all affected residents in this type of disturbing rezoning proposal should be to hold an inclusive community meeting.

### **Meaningful**

"Information provided as part of the consultation is adequate and well-informed to ensure all stakeholders understand the subject of, and issues relating to, the consultation and can give informed responses."

The information provided, while superficially well organised, is very difficult for an average resident to navigate. Finding relevant documents, understanding their significance, and properly following and digesting their content presents a significant barrier. A community consultative meeting should be held where all of the many relevant applications, documents, plans and processes are explained to residents, with opportunities to ask questions and raise legitimate concerns.

"Most importantly, for consultation to be meaningful, it must **genuinely** seek community feedback, AND community views must be genuinely considered and incorporated into final decisions."

There was a large number of submissions, the vast majority of which categorically objected to the rezoning of Block 9, Section 19. Yet somehow, this has translated into an even more impactful and undesirable rezoning proposal incorporating four more blocks, including blocks currently zoned RZ1– with the flimsy and highly unrepresentative excuse that:

"Fifteen comments were received during public consultation with some indicating that a comprehensive proposal should be put forward for Section 19 Forrest, consistent with the area identified in the Inner South District Strategy. In consideration of these comments, Blocks 5, 6, 11 and 12 have been added to the site for the proposed rezoning to CZ5 Mixed Use."

The Forrest residents can have no faith in this consultation process if the most important Principle of Good Consultation is mocked and belittled in this way. This also demonstrates that consultation is NOT respectful – it is not collaborative, genuine and courteous towards all views expressed.

Our community expects that this seminal principle is abided by - feedback should be genuinely considered and incorporated into final decisions.

### **Resourced**

Consultation is resourced if the processes are appropriately supported, taking into account the significance, complexity and likely impact of the subject of the consultation.

This is a highly significant and complex proposal for rezoning, arising from self-interested developers who expect to make a significant profit at the expense of existing Forrest residents and home-owners. There has been minimal process - other than availability of a document and a letter – which demonstrates a lack of appropriate resourcing.

### **Timely**

Consultation is timely if it is undertaken early and at other appropriate times in the planning process; and it is undertaken in a way that considers the needs of stakeholders and facilitates participation; and it allows sufficient time for stakeholders to engage with other members of their group or organisation to form a collective decision; and it is undertaken as early as possible.

The community was notified on 12 March of this major new development in the rezoning proposal. We were given until 22 April to respond, which included the Easter period and School Holidays, and subsequently a very short extension until 6 May. This contrasts with the 3 months that the ACT Planning Department had to consider the same proposals. The community does not have the time or expertise of the planners, but was provided with much less time to read, understand and discuss the proposal than is available to the ACT government. Yet, this major rezoning proposal has significant implications for the Forrest community.

I propose that the wider Forrest community is provided with an additional two months to meet with the Department and discuss this proposal, and then make more informed submissions, before any further steps are taken in the decision process.

### **Transparent**

Consultation is transparent if information provided as part of the consultation and processes for consultation are clear and observable; and planning decisions are made openly; and government and proponents provide reasons for decisions, including how community views have been taken into account.

As I have already stated, community views expressed in submissions to the rezoning of Block 9 have been warped as a rationale to expand the proposal for Block 9 to include other blocks. This hardly constitutes taking community views into account.

### **Heritage and Planning Concerns**

I also refer you to Part C - Planning Principles and Strategic Links (Effective: 27 September 2024) of the Territory Plan. These require that:

#### **Cultural Heritage Conservation Principles**

(b) Planning and design should promote the unique cultural heritage of the ACT by acknowledging established heritage significance in design and placemaking.

(c) Development should:

(i) respect local heritage; and

(ii) avoid direct impacts on heritage or, if a direct impact is unavoidable, ensure the impact is justifiable and proportionate.

#### **Heritage Character Preservation**

The Forrest precinct holds official heritage status under the Heritage Act 2004. Any development within or adjacent to this area must respect the following statutory criteria:

- **Historical Significance:** The site demonstrates crucial aspects of the ACT's social and cultural development
- **Community Connection:** The area maintains strong associations with particular community groups for social, cultural and spiritual reasons
- **Aesthetic Value:** The precinct possesses significant aesthetic qualities valued by the community

The proposed multi-storey development threatens to compromise these established heritage values by:

- Diminishing the distinctive low-scale garden character
- Creating overshadowing impacts on adjacent heritage properties

- Degrading historically significant view corridors and culturally important streetscapes that define Forrest's unique identity

Dominion Circuit includes heritage-listed properties, including my own property. The proposed development will detract from the historical significance and aesthetic value of these heritage properties.

### **High-Quality Design Principles**

(a) Development should be focussed on people and designed to:

- (i) reflect local setting and context; and
- (ii) have a distinctive identity that responds to the existing character of its locality; and
- (iii) effectively integrate built form, infrastructure and public spaces; and
- (iv) provide appropriate solar access;

(b) Public spaces should be designed to be used, appropriately landscaped and vegetated, and should be designed to contribute to the urban forest.

### **Critical Planning Inconsistencies**

The proposal conflicts with several key planning instruments:

1. The development contradicts the National Capital Plan's designation of National Circuit as a Griffin legacy corridor requiring careful transition between institutional, open space and residential zones.
2. The proposal appears incompatible with Inner South District Strategy objectives, particularly regarding heritage conservation, appropriate density management, and development of sustainable, contextually responsive urban form.
3. The development risks violating Territory Plan Residential Zones requirements, especially those safeguarding neighbourhood amenity, privacy protections, and solar access rights for surrounding properties.

Should this amendment proceed unchanged, we will pursue engagement with the ACT Heritage Council and utilise available planning review mechanisms to address these concerns.

### **Broader Planning Context**

We urge reconsideration of this amendment not only due to immediate concerns but also to maintain public trust in a planning system that prioritises integrity, transparency, and community participation.

### **Key Points of Objection**

1. **Incompatibility with existing neighbourhood character:**

- Dominion Circuit is currently a quiet, residential street with historical significance.
- The proposed high-rise development with 400 dwellings and commercial spaces is incongruous with the existing low-density, residential nature of the area.

## **2. Traffic and parking concerns:**

- The addition of hundreds of resident parking spaces and additional visitor spaces will significantly increase traffic on Dominion Circuit.
- This influx of vehicles will disrupt the current peaceful environment in what is a very quiet street and potentially create safety hazards for pedestrians and cyclists. In particular, Forrest Primary School is likely to be affected.
- The traffic analysis done by Sidra already identified both traffic and parking issues related to the Block 9 development alone (Transport Impact Assessment Report Prepared For Sirocco Pty Ltd November 2021). These will be multiplied several times with the proposed developments in DPA-B. This is not acceptable.

## **3. Precedent setting:**

- Approving this rezoning could set a dangerous precedent for similar high-density, mixed-use developments in other quiet residential areas, currently zoned RZ1, making me wonder why we even bother having Zones!
- This could lead to the gradual erosion of the unique character of our neighbourhood.

## **4. Impact on property values and rates:**

- Property owners have invested in this area due to its exclusive nature and quiet environment, paying exorbitant rates and land taxes as a result.
- The introduction of a high-density, mixed-use development is very likely to negatively impact property values and the overall desirability of the area.

## **5. Quality of life:**

- The increase in population density and commercial activity will likely lead to increased noise levels, reduced privacy, and a general degradation of the quiet lifestyle that current residents and homeowners enjoy and have specifically chosen (for which we are paying excessive rates and land tax).

## Conclusion

I urge the planning authorities to reject this rezoning application. The proposed development is fundamentally at odds with the existing character of Dominion Circuit and the wider Forrest area. It would irreversibly alter the nature of our neighbourhood and set a concerning precedent for future developments.

I request that the current zoning be maintained to preserve the unique character, heritage value, and quality of life that makes our neighbourhood special.

If you are not convinced by this submission, and other similar submissions from residents, then I expect that we will be provided with much more appropriate processes of consultation which meet the required ACT Planning Act's Principles for Consultation as described earlier in my submission.

Given my concerns, outlined above in relation to the process of consultation undertaken to date, I would request that you:

- Acknowledge receipt of my submission;
- Treat the issues raised seriously and respond to the specific matters raised indicating due consideration of those matters; *and*
- Inform me of what further opportunities will be available for our community to engage fully in consultations on these proposals for rezoning.

Yours sincerely



## **Formal Submission : Objection to DPA-8 Forrest Section 19 Rezoning**

### **Revised Draft Plan Amendment B – (DPA-8) Forrest Section 19 Blocks 5,6,9,11 and 12 rezoning from Commercial CZ6 and Residential RZ1 to Commercial CZ5 Mixed Use**

#### **Introduction**

I am a resident of [REDACTED] in Forrest [REDACTED] and thereby directly impacted by this rezoning proposal. I have put in submissions on previous proposals to this area, and feel that my and others' views have not been reflected in this current proposal. Whilst theoretically some of the concerns I have would be expected to be considered in a Development Application stage, I feel that these concerns are too important and fundamental to any future development to not be addressed at this rezoning stage. I do not have confidence in the consultation processes already undertaken or expected in the future.

I have been involved in discussions with other local residents in the limited time available for comment on this proposal. I fully support the ISCCC and Forrest Residents Group submissions and other individual submissions. I particularly agree the detailed comments on the failure to adhere to consultation principles that "a person must consider that consultation should be accessible, balanced, inclusive, meaningful, resourced, respected, timely, transparent and understandable" and the heritage and planning concerns expanded upon in the submission by [REDACTED]. I have not repeated these concerns in this submission, focussing more on my own personal concerns at the proposed rezoning.

#### **Incompatibility with existing neighbourhood character**

Forrest is one of the earliest Canberra suburbs and includes several heritage precincts: the Forrest Housing Precinct; Blandfordia 4; a part of Blandfordia 5; and the NCA controlled Deakin/Forrest Housing Precinct. These include inclusions for the protection of street furniture, set backs, verges, traffic islands and significant housing from the 1920s and mid century. Much is covered by the Garden City Principles. While Section 19 is not included within these precincts, both National Circuit and Dominion Circuit provide the main vehicle and pedestrian approaches to the heritage areas, and have always honoured that heritage value, featuring original Charles Weston street tree plantings and on Dominion Circuit having heritage street furniture and several 1920s houses.

The proposed zoning of seven storey high rise development in an area adjacent to heritage listed precincts detracts from the historical significance and aesthetic value of the suburb. This importance will only increase over time.

In addition, in Section 19 and the adjoining Section 12 there are two of Canberra's earliest sporting clubs (tennis and bowling), both begun in the 1920s and still operating successfully for both local and wider Canberra members. The Free Serbian Church in Section 19 is heritage listed with significant murals and icons. Nearby on Arthur Circle are the Roy Grounds listed townhouses and on the corner of National Circuit/Canberra Avenue is Canberra's oldest statue (Robbie Burns). These all demonstrate the heritage overflow into this area and reinforce the inconsistency and incompatibility of the proposed rezoning with existing neighbourhood character.

The proposed rezoning clearly does not meet the included aim “to conserve the existing qualities of the suburb of Forrest.”

### **The streetscape**

Whilst the proposed rezoning includes undertakings on the Dominion Circuit landscaping and streetscape these are not easily implemented or achievable. This streetscape is Charles Weston planting from the 1920s. The street frontage of the rezoning onto Dominion Circuit is approximately 300 metres. It comprises only seven mature eucalypts (*Eucalyptus rubida*), the remainder being much smaller Kurrajong (*Brachychiton*) trees. With the preponderance of the Kurrajongs at an average of 7-8 metres height, the reference at Para 2,2 of the proposal to “....average height of established trees... at around 23 metres” and to a street canopy in scale with seven storeys is not accurate. Only one quarter of these plantings are within that description. These trees are approaching 100 hundred years, with some having died replaced by obviously less mature trees. This will continue over future years. The health of the existing trees and success of future plantings will be severely impacted by seven storey development, being on the northern side of the trees, leaving the naturestrip in constant shade. This aspect will also impact grass or other plantings both on the verge and within the site. It is unclear the extent of the site for plantings/green space, and access to areas suitable for deep soil planting.

The comments above demonstrate the inappropriateness of the proposal and the lack of understanding by planners of the existing environment.

### **Traffic and parking**

Traffic and parking are currently under pressure in this area. The many fold increase for both associated with the rezoning is of concern and not addressed in the proposal other than a passing reference to traffic access on Dominion Circuit. There is a significant influx of workers from Barton offices parking in free street parking deep into Forrest and the temporary paid parking at the corner of Dominion Circuit and Franklin Street after failed developments on Block 9. Eventual redevelopment of that site will remove some 200 parking spots which are currently hiding some of the shortage in parking. Canberra Ave is one of Canberra’s busiest and most accident prone streets so increased traffic either from new residents or users of any businesses from the multi use possibilities will put pressure on Canberra Ave. Neither National Circuit or Dominion Circuit with street parking on each is equipped for a significant increase in traffic.

National Circuit has a public school with many children arriving on foot, cycle or parent’s cars every school day – increased traffic is a risk to them.

Of particular concern would be any approvals for apartments that did not allow for adequate parking provisions.

### **Contribution already made to increased housing density**

Forrest has over the last few decades made considerable contribution to increased residential density, and this has occurred with community support. We are not resisting appropriate redevelopment and increased density.

As an example in the adjacent Section 20, some eleven single houses have been extended or redeveloped to provide multiple dwellings totalling now 35 dwellings. Each has been developed

in scale and style consistent with the neighbourhood. Each also provides two car accommodation for each dwelling.

Another example is on Section 12 where the bowling club was able to work with a developer to have enhanced facilities and greens while also allowing twenty new townhouses to be constructed. Again these are of a scale and design consistent with the neighbourhood and provide two car parking per unit plus visitor parking. There are many other examples of this increased density whilst still retaining the neighbourhood characteristics.

Similar approaches in the future would provide a more appropriate level of development and contribute to the “missing middle” in the housing market.

### **In conclusion**

Section 19 and the surrounding area is an area of low to medium density residential accommodation plus cultural, religious, education and sporting uses. It is not a commercial area other than for a small scale family run motor lodge and apartments. A seven storey multi use development is not appropriate in this area. The commercial centre for Forrest is Manuka.

The current rezoning proposal appears to be a paper exercise aimed at a “land grab” of a perceived underutilised area, without on the ground understanding of, and proper regard to, the unique value of this area to inner Canberra’s heritage. If implemented it will produce an unsightly and incompatible “high rise island” in an important part of Canberra’s culture and heritage. It also provides uncertainty and a threat to amenity and property value to residents in surrounding areas. The passing reference at para 1.8 to “...the directly adjoining Section 12 Forrest” without further clarification only adds to my concerns.

It is also unclear the timeframe of future development given the broadness of “0-10 years”.

Given my concerns, outlined above in relation to the process of consultation undertaken to date, I would request that you:

- Acknowledge receipt of my submission;
- Treat the issues raised seriously and respond to the specific matters raised indicating due consideration of those matters; *and*
- Inform me of what further opportunities will be available for our community to engage fully in consultations on these proposals for rezoning.

██████████

████████████████████

████████████████

██

## **Formal Submission: Objection to DPA-B Forrest Section 19 Rezoning**

### **Re: Revised Draft Plan Amendment B – (DPA-B) Forrest Section 19 Blocks 5, 6, 9, 11 and 12 rezoning from Commercial CZ6 and Residential RZ1 to Commercial CZ5 Mixed Use.**

#### **Introduction**

The Forrest Residents Group (FRG) is writing to provide comments on the proposed rezoning of Section 19, Blocks 5,6,9,11,12 Forrest from CZ6 and RZ 1 to CZ5. The proposal as put forward for public comment will restrict building heights to 7 storeys; will require landscaping along the Dominion Circuit frontage in consideration of the residential area on Dominion Circuit; and limits on the vehicular access and driveways on Dominion Circuit.

This is a submission with a focus on the rezoning of Section 19 and not a submission on a development DA. Our principal concern is with the potential height and bulk of such a development along the Dominion Circuit frontage in such close proximity to 1 and 2 storey residences across the street and adjacent to the Forrest Tennis Club and Serbian Orthodox Church. We understand that the specific impact of a development cannot be assessed until a DA is lodged, but the potential impact is so clear at this stage that it warrants caveats on the rezoning beyond the 7 storey limitation and the landscaping that the Planning Authority has already proposed.

Forrest is not resisting development. Far from it, given how much of Forrest has already been redeveloped and is already apartments (but not 7-10 storeys) and also townhouses. But any development should fit within the existing character of Forrest.

If the Territory Plan is now to be about outcomes-based planning then why are there no specific Rules anymore and no principles to be met and against which developments can be assessed to ensure the appropriate outcomes have been achieved?

#### **Rezoning focus – Height Implications**

The revised DPA-B proposes to amend the Territory Plan to rezone Blocks 5,6, 9,11 and 12 in Section 19 Forrest from Commercial CZ6 Leisure and Accommodation zone and Residential RZ1 Suburban zone to Commercial CZ5 Mixed Use zone. These proposed zoning amendments represent an inappropriate proposal, which if approved, would lead to a development totally incompatible with the essence of Forrest in terms of scale, height, form and environment. The impact on existing Dominion Circuit residents would be negative and substantial, and the proposal of 7 stories plus plant (totalling approx. 24m) would adversely impact on the amenity of existing residences well beyond Dominion Circuit and could undoubtedly be used as a precedent for further 7 storey/high rise developments in Section 9 and potentially other parts of Forrest. We request at least that with this proposed rezoning there be more restrictions on height and better focus on townhouses and terraces which allow for more greening and help prevent heat islands, rather than high rise apartments which restrict light, cause over-shadowing and with their bulk and height diminish the nature and character of the surrounding area.

The concept that the height of the tree canopy can be used as a basis for the maximum height of the building is flawed. The canopy is important, particularly in terms of its cooling effect on residences. But if the building is the same height as the tree canopy, there is zero cooling from the canopy. Indeed, the building will serve as a heat island in the middle of Forrest!

The current rezoning proposal is incompatible with the adjacent Canberra Avenue height limits of 3-4 stories - National Capital Authority (NCA) controlled, which provides an effective traffic sound barrier for adjacent areas of Forrest. The normal and sensible planning approach (and applied to Canberra Avenue) is that there is a transition or 'step down' from say a 4 storey office or apartment building to 1-2 story residential areas. In this proposal, there is actually a "step up" from the existing 4 storey office block (Doris Blackburn Building) on Canberra Ave/Franklin Street to 7 storey in the proposal and then on to 1-2 story residences opposite in Section 20, in the western part of Section 19 and the adjacent Section 12. No transition whatsoever: 7 storey to 1 storey!

Additionally, the issues relating to noise and traffic receive no mention other than a reference to access and driveways on Dominion Circuit, which are intended to be limited. Note that the particular reference to Block 9 vehicular access which was previously from Franklin Street would now impact an area of aged accommodation and adjacent family residences. Should any future development include a hotel, this would inevitably increase traffic and noise, potentially extending into the night. Similarly, the impact to parking needs (already under pressure in this area) has not been addressed.

### **District Strategies, Outcomes and Guidelines**

The Inner South District Strategy identifies Sustainable Neighbourhoods as one of its 5 Big Drivers. To be sustainable, such neighbourhoods would require "New residential development ... of a height and density appropriate to neighbourhood characteristics and amenities", and the Inner South District's Strategy describes these characteristics as being "leafy suburbs, beautiful streetscapes and a mix of old and new buildings", "heritage heart of natural and cultural history", and having "a sense of community". The area surrounding the proposed rezoning, including the residential areas opposite on Dominion Circuit, illustrate this character well. However, a 7-storey development fronting Dominion Circuit would severely compromise these values. The Inner South District Strategy (p43) explicitly recognizes the impacts of large developments on this site when it says that developments should "Consider noise and overlooking impacts of the adjoining tennis courts and church". The same considerations should be shown to residential areas opposite the proposed rezoning area.

A 7-storey development immediately opposite low rise residential housing would also compromise the Outcomes to be achieved in the Planning Technical Specifications (Commercial Zones) 2024. Assessment Outcome 14 requires that the "Height, Bulk and

scale of the development is appropriate, noting the desired zone policy outcomes and the streetscape. This includes consideration of building envelope and setbacks". Outcome 10 requires that any "development achieves reasonable solar access and microclimate conditions to public areas and streets to support their use by the community", while Outcome 15 seeks "Reasonable solar access to dwellings and private open space within a block and on adjoining residential blocks". Clearly these outcomes are unlikely to be achieved with respect to the residential housing on the south side of Dominion Circuit if a large 7-storey development was permitted along the north side.

The Urban Design Guidelines provide guidance for addressing these concerns. They say, under Scale and Massing Transitions (p80), that "building edges should be consistent with the appropriate urban scale, establishing a human-scale experience at street level". Fig 38 (p80) of these Guidelines shows how this can be achieved by "stepping down" the height of a multi-storey development so that it is of comparable scale and bulk to nearby housing. This suggestion is directly applicable to the proposed rezoning to CZ5 directly opposite a RZ1 zone – two areas of completely different character and scale.

The Planning Authority has already placed caveats on the rezoning such as the 7-storey restriction. We suggest that the Authority adds a further caveat to the rezoning that any development be "stepped down" along the frontage of Dominion Circuit to 1-2 storeys. This decision should not be delayed until a DA is submitted. It is clearly needed to achieve the above Outcomes for this area of the Inner South and would give clear guidance to developers prior to submitting a DA.

### **Other issues – Cultural, Social, Sporting, Traffic, Parking, Public Consultation**

The areas impacted by this rezoning proposal are **cultural, social, sporting**, religious and residential. There is no commercial area other than a smaller scale, family run motel. Currently, the commercial needs of this area are met by businesses in Manuka. Why rezone for apartments and CZ5 when there is no shopping centre and the current RZ zone is already suitable for medium density housing. Furthermore, this area has special cultural and historical value both for Canberra as well as the National Capital character itself. The area also includes several heritage precincts such as: the Forrest Housing Precinct; Blandfordia 4; a part of Blandfordia 5; and the NCA controlled Deakin/Forrest Housing Precinct.

**Traffic and parking** are currently under pressure in this area and the rezoning proposal would increase such pressure. Nor are these concerns raised or addressed in the proposal other than as a passing reference to traffic access on Dominion Circuit (Draft Plan Amendment, section 2.2, page 12 of Amendment to Territory Plan Policies "limit driveways to Dominion Circuit"). There is currently significant use of free street parking deep into Forrest by offices workers and the temporary paid parking at the corner of Dominion Circuit and Franklin Street on Block 9. Canberra Avenue is one of Canberra's busiest and most

accident-prone streets and increased traffic arising from rezoning to Mixed Use would be likely to put further pressure on Canberra Avenue . Neither National Circuit or Dominion Circuit with street parking on each is equipped for a significant increase in traffic.

National Circuit has a public school and increased traffic would pose additional risk to the many children and parents using the streets surrounding and providing access to the school.

While information has been provided by government on the rezoning proposal there has been **no other real public consultation** with the residents potentially impacted by this proposal

**In conclusion**, the FRG has been involved in discussions with other local residents in the limited time available for comment on this proposal. We believe there has been failure to adhere to consultation principles “that consultation should be accessible, balanced, inclusive, meaningful, resourced, respected, timely, transparent and understandable” and seriously request that the opportunity to have meaningful consultation with residents in Forrest can take place prior to any finalisation of this major plan amendment.

████████████████████

█████ Forrest Residents Group

Dear Territory Planning,

### **Major Plan Amendment B FORREST, Section 19 Consultation**

I met with [REDACTED] and [REDACTED] of your planning team regarding the proposed major amendment, affecting blocks 5,6,9, 11 and 12 of Section 19. I wish to thank them for seeing me, and spending time explaining the amendment and how development of the site after any rezoning involves a detailed planning process. So my comments are made to provide you with a sense of my concerns and what I would hope a rezoned development proposal should look like.

My wife [REDACTED] and I are residents of [REDACTED] [REDACTED]. We would be affected by any large scale residential/commercial development.

Our top concern relates to the proposed height of the residential development, of up to seven stories. This would cast shadows over our front yard and unit, depriving us of direct sunlight in the winter months. It would also be out of character with where we have chosen to live.

The block we live in bounded by Dominion Circuit, Arthur Circuit, Empire Circuit and Franklin Street is zoned for low key suburban housing. It is characterised by large stand alone houses of one or two stories, and some town houses (again only one or two stories high). Seven storey developments are completely out of character with our surroundings. Tall developments as proposed here are for town centres and major corridors like Northborne Avenue.

Importantly tall mature trees are found along these streets, as well as on larger properties, along Dominion Circuit and surrounds. These trees are taller than the suburban houses (some are over 30 metres tall), this defines the character of the area. For example outside our unit is a large Eucalyptus cephalocarpa, which provides habitat for possums, native birds, including parrots, cockatoos and gang gangs, and wattle birds. Along Franklin St is a boulevard of pin oak, which provides stunning autumn colours and deep shade in summer.

The number of units of the development should be governed by the capacity to provide sufficient parking for two cars per unit, as one car per unit will generate extra congestion in the surrounding area, it simply is not realistic.

The rezoning of land would need some clear development limits on height of residential and commercial structures to complement our side of Dominion Circuit. This should specify :

- Height limit of a maximum of four storeys or equal to 15 metres,
- Setback of 20 metres to allow for landscaping trees and understorey,
- Stepped back development, 8 metres height at the front, with 15 metres height further back, to enable more lighting for all residents.
- Parking provided for two spaces per residence, along with 40 visitor parking spaces, some which should be available for any visitors in Dominion Circuit facing the development.

I have looked over the 15 submissions from the previous round of consultation, my concerns are consistent with many of these submissions.

I am not against progress and rezoning that enables redevelopment of the blocks in Section 19 into an attractive residential and commercial outcome. Indeed a few specialised shops can add to the area, these may be patronised by nearby public servant employees. Furthermore, some contribution to the community use might be possible, a mens and womens shed, or even a gardening education facility would be welcome, especially where some of the demography are retirees.

However, the proposed developments that accompany the proposed major amendment are excessive, in height, in number of units that could be accommodated on the site, and the fallacy that one carpark per unit is OK. It is plainly wrong.

If the proposed development accompanying the major amendment went ahead as proposed the character and amenity of some of the nicest streets in Forrest will be adversely compromised, it is not Northbourne Avenue we are talking about.

By my estimates, as a guide, a maximum of 100 units for the whole of the section 19 blocks proposed for rezoning seems more appropriate.

Many thanks,

[REDACTED]

[REDACTED]

**From:** [REDACTED]  
**To:** [Terrplan](#)  
**Cc:** [Forrest Residents](#)  
**Subject:** Revised Draft Plan Amendment B - Forrest Section 19 Blocks 5, 6, 9, 11 & 12  
**Date:** Tuesday, 6 May 2025 4:06:10 PM

---

**Caution:** This email originated from outside of the ACT Government. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear Territory Planning Authority

Thank you for your invitation to comment on the revised DPA-B.

I am genuinely shocked and disappointed by your revision, which was to broaden the scope of the original draft change, from just block 9 to now blocks 5, 6, 9, 11 & 12. Despite the people who wrote in to the original proposal suggesting we needed a proper vision and plan for Forrest and that this area needs looking at holistically. Instead of doing so you just expanded the parameters to ruin it.

The original amendment was to rezone one block from Residential RZ1 Suburban and Commercial CZ6 Leisure and Accommodation to Commercial CZ5 Mixed use.

I objected to the original change from the low height community use Italo Club to allow for a 7 storey hotel. I am not a planner or knowledgeable about the planning system, however somehow that was allowed – although never built - and now you are looking to expand that kind of height development on that block to a large swathe of land.

Forrest is currently a low level residential suburb and the ACT Government is trying to do to Forrest what it did to Barton and Kingston.

The original Griffin Plan was for a cosmopolitan lakeside city, a national asset. A vital part of Australia's history and a visitor destination. Parks and boulevards, the worlds largest garden city. A special characteristic was the land axis, avenues of approach and the developments surrounding Parliament House being of the highest design quality.

While there is a National Capital Authority (NCA) landscape and sustainability guidelines for the Deakin Forrest Residential Area Precinct Code, these blocks are adjacent to, not included in these guidelines. However the proximity should be considered and the green amenity, sight lines and lower level development should be maintained.

Forrest is not a town centre. It has no shops and not even a kids playground. The dominant urban design character of the locality is low height residential with good set backs, consistent street tree plantings, large scale soft plantings surrounding or encircling dwellings and avoidance of hard surfacing. To avoid parking dominating the landscape, garages and car ports are behind main building facades and overshadowing or impacts to privacy of neighbours is minimised.

What you are proposing is a precedent setting incursion into the suburb that will have ongoing knock on effects. It is not appropriate, it will affect solar access and overshadowing, it ruins sight lines and it is unacceptable in a low height suburb.

Forrest residents are not NIMBYs. We support and believe in social housing and there is a demonstrable increase in housing density in the suburb – however there is a difference between the 'missing middle' style housing and high residential and commercial blocks.

Adjacent to a school, a cultural centre, a heritage listed church, tennis courts, a bowling club and residential housing – this is not the place for 7-10 story approval. Even adjacent to a shopping Centre this proposal would be fought – for example the time spent in the Curtin community fighting the 6 storey 24 m high and getting it lowered to a more acceptable level. That was adjacent to a retail and hospitality precinct. **This is not a retail or hospitality area it is a residential suburb.**

Canberra Avenue is an avenue of approach with five story height buildings on it, on lower ground. Normally buildings step down from avenues of approach when they have public transport, and proximity to shops and workplaces. This would be a step up. Where is the justification for the need for this kind of development?

Children walk and cycle to and from school, families walk to and from the Jewish Memorial Centre, the tennis courts, the bowling club.... residents walk to and from the Manuka shops. This vibrant community space relies upon solar access and green amenity. The suburbs unique identity should be preserved as adjacent to the NCA land and a buffer between the growing hubs of Manuka, Barton, Kingston through to Parliament House.

With such height proposed buildings it will create wind tunnels, disrupt wind patterns, prevent the ability of any street tree replacement plantings from growing properly without the sunlight. The increasing traffic in manuka for the 7 storey hotel without additional car parking, and Canberra Avenue for business purposes continues to shift parking pressures to the Forrest residential area – this proposal will only add to this congestion and compromise safety. A considerable amount of the suburb is now 2 hour parking to prevent the office workers parking all day.

There has been no community meeting, no time for the local residents group to coordinate a community consultation session. This revised amendment was a big shock and I believe is completely incompatible with the nature of the suburb.

If this change is allowed to proceed it sets a shocking precedent for other suburbs. The ‘restriction’ to 7 storeys, landscaping and vehicular access is easy to say but harder to enforce. Once the clause is change developers will push to maximise their profits. The time is now to curtail properly the zoning and ensure there is a natural buffer between the NCA area, and the city sprawl.

In summary – the height change is excessive. The blocks should be limited to an absolute maximum of 4 stories with step down heights to street level, and with restrictions on the building ratio, maintaining the green space and soft plantings. Why couldn't it be considered for RZ4 zone, known as the Medium Density Residential Zone, designed to facilitate medium-rise, medium-density housing in Canberra, particularly along major transport corridors. This zoning aims to accommodate urban expansion and population growth while maintaining a balance between residential development and the city's character.

RZ2 is built around shops and commercial hubs. RZ3 is housing suitable for commercial and employment areas. Forrest is a residential area, not a commercial hub or employment area. We need a holistic approach that considers a long term vision of the desired spatial form, structure and activities of the Forrest precinct and proper urban planning and design. The nature and location of development, land use and infrastructure in the suburb should be properly discussed rather than your plopping a crazy height commercial mixed use development into it with advice that you will ‘impose restrictions’ and that at the DA stage it can all be addressed by design guides and the NCDRP reviewing it. If the land use/zoning allows it, we wont have a lot of room for compromise or concessions at any DA stage.

You refer to supporting reports prepared for DPA-B and two proponent-initiated amendments – shouldn't these be a presentation to the community so we can understand it? This would be an appropriate, respectful and a good first step. Where has the consultation been on these documents, for the general community?

I ask you to either curtail the zoning considerably, or to put this amendment aside until after presentations have been made to the residents regarding what the proponents' intentions are, and all supporting documents have been able to be considered by the community.

Thank you for the opportunity to comment

[REDACTED]

[REDACTED]

**From:** [REDACTED]  
**To:** [Terrplan](#)  
**Subject:** Submission relating to Draft Major Amendment to the Territory Plan B Revised and Rezoning Forrest Section 19, Blocks 5,6,9,11 and 12  
**Date:** Tuesday, 6 May 2025 4:23:42 PM

You don't often get email from [REDACTED] [Learn why this is important](#)

**Caution:** This email originated from outside of the ACT Government. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear Territory Plan and Coordination Section, EPSDD,

I wish to express strong support for the Forrest Residents' Group Submission in the above matter. I also support the Submission of [REDACTED].

[REDACTED] a building consisting mainly of two storeys, recently nominated for individual heritage status and winner of an award from the Australian Institute of Architects, I am a strong supporter of growing calls for increasing the construction of townhouses in Canberra.

Forrest Section 19, Blocks 5, 6,9,11 and 12 provide the perfect basis for such development. Since 1962, the Roy Grounds' Townhouses fronting Dominion Circuit have provided the natural and historical precedent for such forward- looking and community-oriented development. Failure to build on this precedent is clearly due not to the opposition of local residents, but to pressures from the shared ambition of the ACT government and local developers to maximise profit from inner-city land, rather than to achieve a happy balance of denser development and community harmony. The massing of buildings envisaged by this proposed brutal change to the tranquil suburban and heritage environment of Forrest is destructive, both of Walter Burley Griffin's vision for Canberra and Canberra's famous vistas. It is also totally contrary to the planned vision of famous cities such as Paris, where the centre of the city is deliberately maintained as a beautiful and low-rise urban environment.

For all these reasons, and the arguments in the Submissions of the Forrest Residents' Group and [REDACTED], I also look forward to the chance to have genuine face-to-face discussions with you about these proposals before potentially tragic decisions are made which will forever mar Canberra's development and its heritage.

Yours faithfully,

[REDACTED]

[REDACTED]

I am a resident of Forrest who has become increasingly concerned that the push to increase dwelling density within the Inner South is impacting some of the values of this area. Forrest contains a large number of Canberra's heritage buildings and precincts because of its important role in the early development of the city and its central position. These special features of Forrest constitute an important value for not just Forrest but for all of Canberra.

I am writing to provide comments on the proposed rezoning of Section 19, Blocks 5,6,9,11,12 Forrest from CZ6 to CZ5. Amongst other things, the proposal as put forward for public comment will restrict building heights to 7 storeys (cf 10 storeys under CZ5 zoning) and will require landscaping along the Dominion Circuit frontage in consideration of the residential area on Dominion Circuit.

My principal concern is with the potential height and bulk of such a development along the Dominion Circuit frontage in such close proximity to 1 and 2 storey residences across the street and adjacent to the Forrest Tennis Club. I understand that the specific impact of a development cannot be assessed until a DA is lodged, but the potential impact of a 7-storey development is so clear at this stage that it warrants caveats on the rezoning beyond the 7 storey limitation and the landscaping that the Planning Authority has already proposed.

The Inner South District Strategy identifies Sustainable Neighbourhoods as one of its 5 Big Drivers. To be sustainable, such neighbourhoods would require "New residential development ... of a height and density appropriate to neighbourhood characteristics and amenities". The CZ5 rezoning would allow for high rise residential development and so the above requirements apply to this proposal. The Inner South District Strategy describes the areas characteristics as being "leafy suburbs, beautiful streetscapes and a mix of old and new buildings", "heritage heart of natural and cultural history", and having "a sense of community". The area surrounding the proposed rezoning, including the residential areas opposite on Dominion Circuit, illustrate this character well. However, a 7-storey development (approx 21m plus rooftop equipment) fronting Dominion Circuit would severely compromise these values. The Inner South District Strategy (p43) explicitly recognizes the impacts of large developments on this site when it says that developments should "Consider noise and overlooking impacts of the adjoining tennis courts and church". The same considerations should be shown to residential areas opposite the proposed rezoning area.

A 7-storey development immediately opposite to low rise residential housing would also compromise the Outcomes to be achieved in the Planning Technical Specifications (Commercial Zones) 2024. Assessment Outcome 14 requires that the "Height, Bulk and scale of the development is appropriate, noting the desired zone policy outcomes and the streetscape. This includes consideration of building envelope and setbacks". Outcome 10 requires that any "development achieves reasonable solar access and

microclimate conditions to public areas and streets to support their use by the community”, while Outcome 15 seeks “Reasonable solar access to dwellings and private open space within a block and on adjoining residential blocks”. Clearly these outcomes are unlikely to be achieved in the surrounding low rise blocks, especially the residential housing on the south side of Dominion Circuit if a large 21m development was permitted along the length of the north side.

The Urban Design Guidelines provide guidance for addressing these concerns. They say, under Scale and Massing Transitions (p80), that “building edges should be consistent with the appropriate urban scale, establishing a human-scale experience at street level”. Fig 38 (p80) of these Guidelines shows how this can be achieved by “stepping down” the height of a multi-storey development so that it is of comparable scale and bulk to nearby housing. This suggestion is directly applicable to the proposed rezoning to CZ5 directly opposite a RZ2 zone – two areas of completely different character and scale.

I have a related concern that the proposed limit on building height at 7 storeys is too high. It is significantly higher than other commercial buildings in the area. Thus, the commercial buildings across Franklin St from the rezoned area and fronting Canberra Avenue are 4 storeys high. The Commercial buildings along National Circuit between Canberra Avenue and Sydney Avenue are 4-5 storeys high; the Rydges Hotel on Canberra Avenue is 4 storeys high. None are close to 7 storeys. Yet the proposed rezoned site on Section 19 is intimately connected to a major residential area and yet its height limitation is proposed to be set even higher.

The Planning Authority has already placed caveats on the rezoning such as the 7-storey restriction. I suggest that the Authority adds a further caveat to the rezoning that any development be “stepped down” along the frontage of Dominion Circuit to 2 storeys at street frontage. In addition the overall height permitted should be limited to 4-5 storeys to provide a consistent profile for this commercial area. This decision should not be delayed until a DA is submitted. It is clearly needed to achieve the above Outcomes for this area of the Inner South, including its important heritage values, irrespective of whatever development is proposed, and would give clear guidance to developers prior to submitting a DA.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

