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DA201732582. BLOCK 1, SECTION 15, GRIFFITH. 14 MANUKA CIRCLE

The Kingston & Barton Residents Group Inc. (KBRG) was formed more than 10 years ago as a voluntary, not for profit, non-political, community organisation that seeks to promote and protect the interests of its local community and the environment. Its Constitution says: "The aim of the KBRG is to ensure the Kingston and Barton area is a great place to live, and to do this by promoting:

- High quality planning, urban design and construction
- The preservation and recognition of the area's unique heritage character
- The provision of adequate green public open spaces
- Effective transport planning including traffic and parking management, & access for pedestrians & cyclists
- A strong community spirit, and
- Other quality of life matters such as public safety and noise management"

KBRG notes that this DA has been 'reactivated' and that the block in question has now been vacant for around 11 years. It is a significant piece of community land - now increasingly rare in the Inner South as many leases have had their concessional status removed. KBRG is keen that an outcome is achieved which is positive for the community and the Canberra Services Club.

However, in response to the original DA, KBRG raised many issues including a lack of consultation prior to the DA being submitted. We are not aware of any other substantive community consultations about this DA initiated by the Canberra Services Club and Purdon Planning prior to the lodgement of the reactivated DA.

Other organisations and groups that might reasonably be expected to have been consulted are Friends of Manuka Pool, Photo Access, Manuka Oval management and the business owners and residents on the opposite side of Manuka Circle.

After the reactivated DA was lodged a further consultation was held on 14 March 2024 as a result of an approach by the Friends of Manuka Pool. Attendees also included representatives of KBRG, the Griffith Narrabundah Residents Association, the Inner South Canberra Community Council and others, indicating the considerable level of community interest in this project.

We note that the statutory framework requires the Minister to take account of the Social Impact Assessment (SIA). Unfortunately, the SIA provided with the reactivated DA is seriously deficient. In addition to the limited community consultation, the most concerning deficiency is that there is no summary of the issues raised in consultations or how the proposal was altered as a result. This is a requirement of Section 3 of the specific guidelines for Social Impact Assessment. The SIA is also missing the analysis of economic and cost benefits as required by Section 2 of the guidelines.

We suggest that the proponents be asked to submit a revised SIA that meets the requirements of sections 2 and 3. Without these the decision maker is missing some essential information required to reach a decision.

The consideration of alternatives in the base contents of the SIA could address whether, if the concessional status of the lease is removed, conditions could be imposed on a new lease that require it to be operated as a community facility in conjunction with other uses that contribute to the ongoing viability of that facility. This might require the proponents to seek advice from the planning authority.

The community would be able to make a more informed decision about supporting the application if there was much more information available about what was planned for the site. So far only a generic business model has been proposed comprising the club and a hotel on the site, possibly with a gym. We understand that this might require the DA to be accompanied by a plan that specified what was to be built on the site and how the more significant siting issues such as access during major events would be managed.

KBRG also notes the response by Minister Gentlemen on 26 March 2018 to a Question on Notice from Ms Le Couteur MLA stating that "the Government is committed to a new Master Plan for the Manuka Oval Precinct. At this stage, the formation of the community panel has been deferred pending completion of the Manuka Oval media and broadcast facilities. This timing also avoids confusion arising from the National Capital Authority's review of the Development Control Plan for the area. Any future development will be guided by the community through the development of the Master Plan."

KBRG suggests that no DAs for this site should be considered until the promised ACT Government Master Plan has been finalized (following appropriate community engagement, of course) and hopes that a positive outcome that protects community land and assists the Canberra Services Club to remain viable can be negotiated.

Richard Johnston President, KBRG

18 March 2024