Written submissions from City and Gateway Urban Design Framework Stage 2 Community engagement

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1	Canberra is turning into a ****hole city while sleazy, slimey pollies and greedy developers are teaming up and cashing in. Extra dwellings would be good if it was helping young people get into the property market. Poor people will be losers again, while it opens up so many $$$$ opportunities for rich and sleazy
2	What - now proposing only 2 lanes on Northbourne Avenue between City Hill and Antill St? Yesterday with only two lanes operating due to light rail works it took me 30 minutes to travel from Alinga St to Macarthur Avenue at 8.30 am.
3	I own (and live in) an apartments in the blocks currently flagged for re-zoning around the MacArthur Ave intersection. I would welcome the opportunity to speak to a planner to understand the impact on my property, but I am out of town this weekend, and I am unavailable to attend during work hours. Do you have plans to provide access to people outside of work hours? The limited options available don't seem reasonable for the magnitude of the changes you are proposing and the number of Canberrans who will be impacted by this proposal.
4	Thank you for the opportunity to comment. What a revolting disutopian vision for what used to be the Bush Capital. Dreary concrete edifice complexes festooned with laundry and cheap draperies housing pallid fat denizens living on cheap takeaway. Overcrowded schools and services, drab "pocket parks" so overshadowed in winter that they resemble decrepit ice-rinks, struggling street trees, backed up storm water and sewage systems and endless noise from people and vehicles. Even now, Canberra's open spaces are ugly in the baking heat and dust of summer and repellent in the cold gloom of winter. We lack enough attractively planted, suitably shaded parks with verdant beds and lawns, coffee shops and play equipment that kids actually like. Haig Park is a pit. Garema place is a concrete desert. City Hill a dated and isolated island in a sea of traffic. I am so glad I wont be living in this ghastly hole in 5 years time, our family is moving where the ALP is not run by the CFMEU, bikie gangs and tasteless nouveau riche developers (yes I mean GeoconArtists).
5	When reading the Canberra times this morning I noticed an article that discussed possible changes to the legal height for buildings in Canberra. I know public opinion was encouraged so please read my thoughts below. I am in disagreement with allowing higher buildings in Canberra. You may think that it is just the older generation who consider Canberra as the bush capital and have 'old town' views as Mr Barr was previously quoted, but this is wrong. I am 22 years old and have always lived in Canberra. I am not a country bogan and neither are my parents. I am university educated and would like to think that like all Canberrans my opinion should be heard. I bought my own home in Canberra and the reason I decided to stay in the area I grew up in was because of how unique it is. Canberra is not a big city and convenience is really a great selling point for our city but what I love most is that we are surrounded by nature and that is why we are 'the bush capital.'

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	The recent urban development's taking place are a stark contrast to what Canberra has always been. The white modern buildings all of different heights are an eyesore and cause disruption among the roads that weren't built for this level of congestion. I'm seeing some of our beautiful landscapes be bull dozed to make way for more of the same compact style living and companies competing for the highest building. Our environment is suffering not to mention the beautiful native animals we are so lucky to have right by our door. Canberra isn't meant to be an imitation of Melbourne and Sydney. Canberra has always had its own personality and shone through amongst criticism. Changing the building height limit is morphing our city and soon we will be just like the other big cities - cultureless, dirty and concrete. If I wanted a concrete jungle I would have moved to Sydney but Canberra is special because of the bush and those beautiful mountains we wake up to everyday. I understand the need to keep up and continue developing but this can be done without losing our uniqueness and personality. Don't make Canberra like everywhere else.
6	I am writing to, with strong reservations, support the increased density along the tram line. I however would only support this proposal with the development of stringent standards for all new development and harsh penalties for deviations from these standards. Double glazing, natural lighting and extremely energy efficient targets must be met to minimise the environmental impact of the increased population. I would also encourage solar panel and batteries to reduce environmental impact. Tender for developers must be transparent (with developers who have previously not complied with the DA banned from applying) OR even better, the ACT government should act as the developer to guarantee standards of building and to ensure the profits from these developments benefit the ACT population, not merely lining the pockets of developers (who are on par with used car salesmen in term or reputation in Canberra). Community greenspace must be included in these developments, as must consideration for families. An example of excellent density comes from Copenhagen in which apartment blocks have communal green space and play equipment for children, vegetable patches etc. Further, the aesthetics of these developments must be a great deal better than the flammable Lego block monstrosities which have been built over the last 15 years. Prime land cannot be given to developers who will half-ass buildings to maximise profits as has happened elsewhere in Canberra. Humans have to live in these buildings and as such, they must be livable, safe and have amenities nearby to encourage walking and use of public transport. Owner occupiers should be given priority in purchase. Given that these buildings will not only house thousands of people but also form the first impression of Canberra, they must be of excellent quality. This needs to be guaranteed before there will be community support. The standard of buildings currently do not inspire much faith in future developments and there needs to be a legislative basis that assures quality.
7	I wholeheartedly support any and all efforts to bring more housing of all types to the City and surrounding areas, and believe this proposal is an excellent step towards energising these areas by bringing more people to work, live and enjoy these areas. I believe the lifting building height limits is a necessary and sensible step to achieve higher populations in the City area, and that doing so will help bring more businesses and recreation opportunities to the City area and Canberra generally. I believe that more housing in the City will allow businesses to leverage the population living in the immediate surroundings and this gives more opportunities to businesses to open and flourish in the City. Additionally, I believe that building up to and around the Lake is an excellent idea. I would like to see a "barrier" of 10-50 metres around a large portion of the Lake to remain as public recreation spaces including bike paths, parks and green space; to ensure the Lake remains very much a public area. However, I

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	think that allowing restaurants, bars and some retail stores around the Lake would help bring people to what I consider to be one of Canberra's best and most underutilised assets. The Lake is very pleasant and interesting and it makes no sense to me that it exists mostly within a void, isolated from the rest of the City by Parkes Way and in an area which gets little to no foot traffic and in which only attracts people who are specifically going to the Lake itself. I think that a boardwalk style development of mixed-use buildings would help liven the area around the Lake and support all efforts to ultilise and develop this area more, such as City to The Lake. Please take my ideas into consideration. As I have not found information regarding how this email would be used on the YourSay website, I would like to request that my name and other identifying information be removed from this information if at all possible. I would appreciate more clarity about how this information would be used and whether it will remain paired with associated data such as my name and email address, who will have access to this data and for what purposes it will be used. I request that this information be made more clear in the future, as it was not clear to me if this email is bound by the T&Cs and Privacy Policy of the YourSay site or not.
8	It appears to me that we are going to have another canyon of multi-storey wall-to-wall apartments like Flemington Road. An absolute disgrace and destroying the unique fabric of Canberra as a garden city.
9	I'm very much supportive of the planning framework. Combined with Light Rail it will represent a transformational change for the City's north which is long overdue. As a homeowner in O'Connor, I'm looking forward to the improvement in services, amenity and transit options the implementation of this framework will provide. I also support the densification of the Northbourne corridor, with higher intensity land use. This though needs to be balanced with provision of additional services and amenity to support the growing population. Activated ground planes will also be essential around key nodes and tram stops.
10	Reducing Northbourne Avenue from 6 lanes to 4 lanes seems like lunacy to me. Pedal Power wins again, and to say there are alternatives is to deny the fact that the road network in the ACT is not keeping pace with population growth. Why not put the cars wanting to go through Civic underground in the last three blocks before City Hill? That would create a real City Park. In fact that was suggested on the front page of The Canberra Times many years ago: while the date was April 1, it remains a great idea. Any dedicated bike paths should be located on the roads that run parallel to Northbourne Avenue ... on both sides.
11	I just wanted to pass on positive feedback concerning the proposed 'urban villages' and hubs along the Northbourne light rail corridor. I am a homeowner in this area and am very much in favour of the Macarthur-Wakefield Avenue activity zone. I believe these plans are forward thinking and will drastically improve the quality of living in the area.
12	I notice the medium-term plan is to investigate reducing Northbourne Avenue to two lanes. This is after adding another 37,000 dwellings to the corridor. Northbourne Avenue is already congested, adding 50,000 or so commuters and then reducing the main road by a lane seems like it would make the current gridlock far worse.

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	I appreciate the desire to move people onto public transport or walking/cycling, but this seems like very risky way to do it. It would be a shame to see Canberra with the same traffic problems I see in newly developed areas of Sydney and Melbourne.
13	In my opinion one of the main roles of government is to protect the populace from developers, who would otherwise turn our bush capital into something far less pleasant. If you don't like Canberra, please quit the legislative assembly and go live somewhere you do like. Unless, of course you have developers slipping you so much money you can't resist it, in which case I would suggest you expose them before some member of the press exposes you. With regards to your proposals for development, I categorically reject them. Hoping for a miraculous change of heart on your parts
14	I write to provide feedback in relation to the recently released City and Gateway Draft Urban Design Framework (**Draft Framework**). My concerns relate to the Downer side of the "northern investigation area". In particular, I am concerned about the buildings fronting Northbourne Avenue in Downer being increased from presently a suburban zone to permission to build 18 metres (roughly 7 storeys). I am a resident of [….] street, and I live in a [....], all but two of the houses on my street are 1 storey. To have the proposed 7 storey buildings sharing a street with mainly 1 storey houses would look incongruous and dwarf the single storey residential houses. The Draft Framework states: "Downer blocks fronting Northbourne Avenue/Federal Highway are proposed to increase from existing 8.5 m (max 2 storeys) to 18 m (max 6. storeys) with marker buildings of 22m (max 7 storeys) at the southern corner sites of Fedearal Highway and Phillip Avenue. This is a long term proposal that is consistent with the changes to the heights proposed on the North Lyneham side of the corridor. The North Lyneham side of the corridor is not comparable to the Downer side, which has residential buildings directly facing the proposed 18 m site." The Downer and North Lyneham side of Northboure Avenue are not comparable sites and a distinction should be made in the Draft Framework for this. Looking at the North Lyneham side of the corridor, there are large sites that are largely non-residential, such as Epic, the Yowani country club and netball fields and playing fields. It may be appropriate to have 7 storeys on this side of Northbourne Avenue. However, on the Downer side, there is mainly suburban residential buildings that (at least for my street, […]) would share a road with the proposed 7 storey buildings. It would be incongruous to place 18 m buildings next to single storey residential houses. Further, the parts of Northbourne Avenue in Downer which is zoned to permit a cluster of Motels, does not do not share a road with 1 storey buildings, it has a separate service lane and an extra line of houses behind the motels. While I accept that building heights along the corridor, including in the northern investigation area may need reconsidered, I consider that 7 storeys is too high for most of the Downer side of the northern investigation area but particularly for parts of the corridor that share a road with single storey dwellings. A more appropriate height for the Downer side of Northbourne Avenue is 3/4 storeys. This is currently the built scale on Forbes St Turner and it is a compatible height with the remaining 1 storey houses that are scattered through OConnor.
15	I wish to voice my objections over the disgrace that our local govt has created within our city. I am a 7th generation [....] Canberran born and bred here, my family all helped build Canberra from a valley of sheep paddocks to a beautiful city.

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	I have watched in the space of the last 3 years in particular our local govt do backyard handshakes with developers eg: Geocon and our once unique and beautiful city turn into a high rise hell and roads and any available land constantly in a state of being ripped up and destroyed. The light rail is a total farce and the chaos it has created is disgraceful, it has destroyed the gateway that was Canberra. Now all you see is overcrowding..never ending construction..a mess..an eyesore. I am truly ashamed of what you have created and the money that the ACT labour govt continuously wastes. We need decent schools..more policing, decent bus system, drug problem dealt with, not more ****dy ugly black and white high rises and their stupid "precinct" nonsense. I personally despite being a life long labour voter as of the next election will be taking my vote elsewhere. As for Mr Barr's comment about people living in the 40s, wake up and get your head out of the developers backsides. I was born here in 1963 (raised in Ainslie) so I'm not an "oldie" by any means but enough is enough...NO MORE HIGH RISE DEVELOPMENTS MR BARR!!!!
16	This plan seems to completely disregard the ambiance of Canberra. One will soon not know if one is in the "bush capital" or in the centre of Hong Kong!
17	I like it. I've always thoughts the entrance into Canberra from the north was fairly uninspiring.
18	My comment is that despite the government wanting to call Northbourne Ave a transport corridor and not arterial, the reality is that it is and will remain one of the major arteries of Canberra. Chopping it back to two lanes is unrealistic and quite frankly a nonsense. Not everyone can catch public transport or cycle, the road is chockablock now and will only get busier so taking out a lane is dull.
19	I am largely enthusiastic about the proposed plan, especially with regard to increased density and height limits. My only comments are as follows. 1. Where the plans calls for a mix of introduced and endemic species I would prefer the choice be heavily weighted towards the latter to compensate for the overrepresentation of introduced species in much of the Inner North. 2. Secondly, where development on Northbourne Avenue's access roads and parallel streets take up blocks facing onto both the access road and parallel st I think approval processes should encourage permeability. That is there should be many, many more options for pedestrians and cyclists to pass from the inside of a suburb to Northbourne Avenue. Existing st layouts are designed to isolate active transport use from the main arterial which helps keep it barren and lifeless.
20	This major road to the city needs to remain at 3 lanes with current traffic. More dwellings will require a 4th lane. I cannot see reduction in lanes a sensible way forward. Please review this decision.
21	Plans look good however it's very short sighted to reduce northbourne Ave. it needs to remain three lanes wide. Since the people living along the route will benefit than the blocks should narrowed to allow the wider paths. The light rail is not going to reduce traffic as people from interstate are not going to use it. Sydney's roads are narrow, has a better transportation system than Canberra by at least 100 years and they are struggling with traffic and over development. If buildings can go higher they can trade off a bite of land 2m for wider paths.

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22	I would love to see Northbourne Avenue turned into city boulevard but the current nature of the road as a main entrance to the city would have to be moved somewhere else. Northbourne Avenue would not cope with the amount of present day traffic when reduced to two lanes.
23	Removing ANY traffic lanes on Northbourne Ave is frankly stupid beyond belief. It is one of the few truly congested areas in Canberra and you not only want to increase the number of people living and working there, but also reduce the available road space by 50%. Have you actually thought about this at all? Sure the residents of Gungahlin can catch the tram, but the rest of us still need to get around Canberra and sometimes we need to pass through Northbourne to do it. IN OUR CARS! Let me make this clear since you are seemingly quite dense. I am 100% opposed to any reduction to the number of available lanes that can be used by vehicles along Northborne Ave.
24	I have recently purchased one of the [….]. I am really excited by the plan for Macarthur Urban Village. It's great to see Canberra evolving and finally thoughtful design for Canberra's centre.
25	I have just had a really quick look through the draft urban design framework on the website. I am glad you are undertaking this project as the entrance to the nations capital has been quite dilapidated for some time. Making sure the buildings along Northbourne are a mix of residential, commercial and retail and dining/drinking options would be great. It would be nice for it to be an active part of the city both during the day and night with destinations for dining or shopping. Let's create places for people to stop on the light rail route other than home or the city for work. My main concern with your plan is the building heights. I moved to Canberra from Sydney and one of the things I love most about Canberra is its low rise built environment. The buildings are at a human scale and don't dominate the environment - they hide among the trees. The nearby hills tower above the city, nature dominates the city not the other way around. In big cities like Sydney and Melbourne the buildings dominate the skyline and environment. They are not at a human scale, daylight is blocked and you can't see out. In Canberra I walk outside at lunch in CBD and feel the sun on my skin and see the hills and trees around. This is lovely and it should stay this way. I am in favour of increasing density in some areas of Canberra but this can be done with townhouses, terrace houses and short to medium apartment blocks similar to what is already along Northbourne. There is no need for big tall towers. I think the building height along Northbourne and the city should be restricted to match the heights of what is already there. As you say increasing the heights would provide 75 years worth of residential supply. Is this really necessary? There are plenty of other areas in Canberra where we can increase density and therefore supply so that we can keep the low rise nature of the city. Please don't turn Canberra into a Sydney, Melbourne, Dubai or New York with towering monstrosities dominating the skyline. Let's keep our buildings hiding among the trees!
26	How come all the height measurements are given in metres rather than storeys? This is VERY DECEPTIVE!

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	This is the complete opposite to the approved Woden Development Plan where all heights are in the much more comprehensible STOREYS - and varying between 12 and 26. That plan also describes how the storeys vary and have a gradation between the various precincts! My research tells me that 48 metres would equate to between 12 and 16 storeys (depending on the nature of the storey - i.e. residential or office). In the same way as I am trying to get the ACT Government to have a MODEL of the Woden plan made (or at least a detailed, accurate 3D projection), I would ask YOU to do the same and make it available widely for discussion. It would be very helpful.
27	The plan for the northbourne corridor is alright however i believe cutting some sections of Northbourne avenue down to 2 lanes will cause bottlenecks to occur along the road. while yes this allows for better pedestrian access along Northbourne it will become a headack for cars of which their are over 50,000 that use the road daily. i also believe the height increase along the corridor is good. taller buildings allow for better design and better use of space (eg cafes on the bottom, small offices on the mid floors then residental at the top). however in the main area of the city buildings should allowed to be taller. the current 60 meter rule is restricting design. its causing "Square boxes" to pop up which is creating a eyesore in the city. taller buildings would allow for more creativity and prevent eyesores. look at some new deveploments in canberra such as Republic in Belconnen and Infinity in Gungahlin. theses are tall buildings with large amounts of space. theses buildings have open spaces for people to enjoy and also provide large amounts of residental space. and arnt eyesores. so maybe consider relaxing the height limit.
28	I would like to communicate my position regarding the proposal to raise the building heights on Northbourne from 25m to 48m. I absolutely do not support this. Canberra is already suffering from the malaise that is the light rail project. The area will be noisy, and traffic will be dense. We are already losing what was great about Canberra – the fact that it balanced elements of city and nature. Increasing the building height will amplify what will be an incredible amount of noise from the light rail, and contribute to the transformation of our bush capital to another Sydney or Melbourne. Please reconsider.
29	I have a couple of queries in relation to the recently-released City and Gateway Draft Urban Design Framework. In principle, I think the Framework has a lot of merit and potential. I do however have a couple of specific questions in relation to the plans proposed for the Macarthur 'urban village'. My first question is in relation to the timeframe envisaged for the Macarthur development, assuming it goes ahead - when would you imagine construction was to begin? My second question is in relation to the image titled Map 10 in the Framework document. The areas surrounding the proposed urban village are coloured in a very light purple - the legend suggests these are slated for 'medium density residential' purposes. An investment property we own is currently on one of these identified blocks. Are you able to give me a sense of what is actually planned for these blocks? Would existing dwellings/blocks in this area be bought and re-developped? It would be very useful to know this ASAP for our own personal planning purposes.

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30	Just wondering if EPIC is part of your plans. It is part of the fabric of North Canberra and it would be a shame for it to be turned into high rise apartments. If it is on the table it would be good to share this with the voters of North Canberra early so they can form a view.
31	"The Chronicle" Tuesday 6 March 2018 article "Height limit rises" makes it clear that the ACT Government's policy is to raise building heights in order to ensure there will be an ever increasing population in the city. The article also says (there will be no) "no new public housing for the urban renewal precinct for the next four years". One could conclude, given these policies and the article's mention that the new National Capital Authority (NCA) chief was party to the release of the plans, there is absolutely no point in the ACT Government continuing the sham of asking for public comment. Given the Chief Minister's deplorable attitude towards the ACT public when it comes to the ACT community I find it a bit rich that the public "has until April 27 to comment on the plans". Really? It is crystal clear that the ACT Government - despite being a Labor/Green coalition - places no value on social housing or its responsibility to build a live-able city for all its people. The government only places value on making as massive a profit as possible from land sales and development to, among other things, prop up the massive costs of the "Rattenbury Rattler" (my interpretation) ie tram and its extension(s) south. Sadly, given this prevailing situation, the fact that I think the proposal for ever increasing height limits is daft, I expect to fall on deaf ears. However, if the ACT Government were to convince the NCA to cede to it the racecourse grounds and the showground (EPIC) for development, then perhaps the people of the ACT might feel sufficiently emboldened to challenge such a move. I do sincerely hope so.
32	I have an issue with the following statement I found in the City and Gateway draft urban design framework https://www.yoursay.act.gov.au/application/files/5715/1978/9098/City-and-Gateway-Urban-Design-Framework-2018-Access.pdf 'Changes to Canberra's wider road network will reduce through-traffic by encouraging drivers to use alternative routes, including the peripheral parkway system. This will create the opportunity to design Northbourne Avenue and city streets for people and activities rather than just for cars.' It doesn't reflect reality. The city is growing and yes people will use public transport or cycle but not all are able to (child care, mobility issues etc), or indeed want to. Reducing the traffic capacity of a Major arterial road down to two lanes in each direction (as I believe has been suggested elsewhere) without providing realistic alternatives is to be frank naive . If I could go further the mere suggestion supports the premise that the current government is anti car. Way forward. I belive it is indeed possible to increase the housing density (no Issue from me), improve the public transport options and cycling/walking options but keep the same three lane traffic capacity.
33	I note with relief the "artists impressions" of the proposed plan. HOWEVER! I have too much experience of these to be satisfied (read 'believe') that the intended landscape will in any way match those attractive layout designs. My concern at this point is primarily the removal of the Northborne trees. They defined "The Bush Capital" to folk entering the city. I understand that this is being replaced on registration plates, as everyone recognises it is a sham, & represents the lost/past image. A bush capital is not a bad thing – it is a "green

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	& friendly" capital & will never be – (nor should even aspire to be a Singapore. So we should relish and promote our natural assets – green spaces, trees & views of hills, and not cower to the cities who have lost their soul and now serve only the malls & shopping bags. The abovementioned photos suggests continued avenues of mature trees (not isolated shrubs), yet we see little "dirt" space such that the preciously low levels of rain we receive now (& more erratic in the future) could drain into the subsoil to effectively support the growth & flourishing of mature summer shade trees. The benefits of trees are rarely promoted by the property developers. But they are the key to community amenity, and increasingly to human physical and mental health, and amenity. They keep the surrounding region 7 degrees cooler on the hot days, clear the air & promote bon-homie. As such, they are critical to a liveable and sustainable city. A city people choose to visit & live. Certainly the infrastructure, housing, shops, restaurant, public transport networks, creative and recreational places are required. These just need to be dotted about amongst the trees. I implore you, please adhere to the artistic impression as promoted. (More trees are always welcome). But please, do not use such diagrams as a deceptive scam to recruit support.
34	I like to see all over Canberra, all the old unit buildings privately held and by ACT Housing to be considered for upgrading eg like in Downer [.....] (private) and […….] (ACT Housing). Such as like allowing greater tenancy and underground parking so that new buildings can be erected.
35	Some preliminary comments on this current developmental study for the northern approaches of Canberra, and Civic, and related matters. (Some readers may need a Canberra street directory or similar to follow this.) **Summary.** Resigning oneself somewhat to Murdoch University's Peter Newman and Jeffrey Kenworthy 1991 "Sustainable Canberra" or "urban-villages-with-light-rail" dream, anachronistic as it now is, and inappropriate as it always was, while trying to temper this latest iteration with more sophistication and panache befitting the national capital, and less ignorance and greed - i.e. pushing back against creeping "land economics", now sadly taken as a substitute for, but the antithesis of, comprehensive town planning, and exemplary architectural, urban, and landscape design. Impressive as it is in addressing various issues of amenity and sustainability etc, this "design framework" study really is a transparent scheme to encourage an increasing sliding scale of "land value capture" along and around a major Canberra approach route (at the expense of the other town centres here), so swelling government coffers; and to force people into flats, and on to the outlandishly expensive new tram system, at a time when better forms of accommodation for most households are required, and better and more sustainable forms of public and personal transport are fast emerging. And, sadly as usual, we simply need more creativity and vision in this plan. **Comments.** **1. At a related symbolic level, it's time to scrap the place name City and return to Civic - to express and restore the true and unique nature of Canberra, especially in the minds of residents and visitors, and to discourage destructive "land economics".**

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	This single high-handed, disrespectful action to change the historical name of Civic, typifies the attitude of those pushing the current destructive "land economics" movement. There was no public consultation on the change, back in 2005. Civic is still the preferred name, judging by its common usage amongst the old and the young, references in the press, etc. Open space defines Australia. The physical expression of Canberra reflects that. The centre of the National Capital is Parliament House. And, Civic is constrained by mountains and national-capital areas. Responding to those points, our inspired early planners opted for an urban-sprawl-preventing well-connected-up dispersed town centre arrangement, and the name "Civic". "City" is a misguided, expensive re-naming, foisted on the ACT in by the 2004 neo-con out-of-town-political, developer-dominated "Canberra Central Task Force". It was the start of a cringing attempt to make us have one throbbing CBD, like everywhere else, and so make property developers feel at home. The Task Force substituted planning with insidious "land economics", the failures of which we're seeing all over Canberra. In the national and ACT interests, it's time to reverse that, starting with reinstating the name "Civic", and establishing a toothed government planning committee, sitting in open session, so that such key matters are part of a more democratic process. Our five main town centres (Civic, Woden, Belconnen, Tuggeranong, and Gungahlin), plus Manuka-Kingston, Weston, Dickson, and others, plus future centres (if they eventuate) in Ginninderry and Lower Molonglo, are or will be our "urban villages", not to mention Queanbeyan; and the proposed over-densification of Civic and the Northbourne Avenue precinct needs to be tempered so as to avoid blighting those other ten or so vitally important, mostly successful but threatened centres. The place name "Civic" is part of our heritage, and must be restored. **2. High Speed Rail (HSR), and Ainslie Avenue - essential, but overlooked ingredients in any gateway discussion.** There is no mention of HSR in the study, and there obviously needs to be. It is a major factor in the whole raison d'ètre of the gateway concept. HSR and decentralisation are vital to the long-term connectivity, and the environmental and economic sustainability of this country. It is the subject of a very detailed recent report by the Commonwealth Department of Infrastructure for a comprehensive HSR system from Brisbane to Melbourne via Sydney and Canberra, which recommends the Sydney-Canberra section for implementation first, and Civic as the location for Canberra's station - and specifically not the airport, over-development of which has already upset Canberra's orderly planning and development. The Department's plan is better, less divisive and destructive, and more sustainable and professional than other HSR proposals, e.g. the private-sector Consolidated Land and Rail Australia (Google it for information), which ignores existing regional centres and is blatantly all about new real estate capture (note the word "land" in its title). The recommended access to Civic in the departmental report is via a railway tunnel (one of many on the overall route) under Mt Ainslie, saving on land acquisitions, noise, and vibration, as well as allowing high speeds to be achieved close to the station in both directions. This brings in related Ainslie Avenue, which is not, but should be included in this framework study for planning control changes.

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	An additional consideration in this is the concept of a "national capital arrival experience" which could be enhanced by locating the station at high level over the intersection of Ainslie Avenue and Limestone Avenue, affording brilliant views of Civic, the War Memorial, and the Central National Area from the station's elevated glass concourse - not available from the quite sensible but prosaic department-recommended station location deep below "lower" Ainslie Avenue. Station car parking is better achieved in the suggested alternative location, and hotels exist or a planned nearby. A public debate was held recently by The University of the Third Age (U3A) - airport v. the above location, resulting in a preference for the Ainslie-Limestone Avenue siting, after an audience vote. **3. Reid - another largely ignored ingredient, the development of which, together with Braddon and Turner, can ameliorate the frantic intensity of the proposed Northbourne Avenue "urban villages" etc.** Because of its very close proximity to Civic, and being surrounded by Parkes Way, Constitution Avenue and Anzac Parade (also "gateway" routes), the inner urban precinct of Reid obviously needs to be included in the framework area for planning control change. It is a natural area for densification, and this can be achieved via careful planning and design controls that look at small-scale incremental intensification, and selected high density sites, so respecting the area's notable if genteel and un-Griffinlike built heritage. Ainslie Avenue is related to this matter, because of its immediate proximity to Reid and the above HSR arrangement. Both Reid and Braddon, and Turner can offer convenient denser urban living with more peace and quiet than the proposed frantic Northbourne Avenue "urban villages", which can then be correspondingly reduced in intensity. **4. A wider range of intuitive city approach routes, especially with inevitable traffic congestion on Northbourne Avenue, and the loss of Central National Area views from City Hill. (Sacking "land economics")** In its enthusiasm to promote Northbourne Avenue as the apparent one-and-only city gateway route in this study, planners are overlooking the inevitable congestion that will occur along that route, when combined with trams, and the intensive development proposed along and near the avenue. This approach to the city entry is clearly driven by that insidious syndrome, "land economics", the antithesis of good planning. Many visitors will turn instead, for instance, to the new Majura Parkway, which can bring them into places like Russell where there is an elevated apex of the National Triangle. This arrival point affords the best views of the Central National Area, the lake, the mountains beyond, and the various national institutions, notably Parliament House. (Such views will virtually disappear from Vernon Circle on the City Hill apex, with the proposed overly dense development there - some gateway! We need open space to the south and south-west of City Hill.) Accordingly, the study needs to look at upgrading the above eastern city entry route, notably Northcott Drive, which connects into the Russell apex from the north, and even Sellheim Avenue accessed from Morshead Drive, the approach road from the airport. Otherwise, the study's proponents reveal themselves as totally serving the commercial interests of developers, at the expense of the national significance of Canberra, and smooth un-congested traffic flow. Of course, Russell offers visitors a more legible choice of destinations - the Central National Area itself via Kings Avenue, and Civic via fast-developing Constitution Avenue. **5. Mandatory design competitions - stronger criteria for the release of sites for development in the subject areas. (Again, sacking "land economics")**

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	It is true to say that this town has failed in recent times to achieve exemplary standards in architectural design, particularly in private-sector commercial and residential developments of scale. Apparently, unlike in say, Melbourne, where design expectations are high, developers reckon the "market" in Canberra doesn't warrant exemplary design, and that they should be the arbiters of such matters. Rubbish to that. So, it is very important that this be addressed in the study, as the subject areas are in highly prominent locations regarding "national capital significance". It is already National Capital Authority policy to involve design competitions in the development process, but we have not seen much of that at all. Commercial considerations are currently the only criteria. Canberrans and all Australians deserve better in their national capital. Bids for key sites need to include design, and the best way to achieve that is to involve design competitions. For government owned sites, the process is relatively simple, and for others, the leasehold system can be utilised. Each bid for a site needs to be accompanied by, not just a monetary figure, but a fully developed professional design proposal, covering all disciplines, which must be taken into account in decisions to award sites to particular development proponents - i.e. the best design wins, and is binding, with construction commencing immediately. This would eliminate the insidious practice of auctions, where we've seen some wildly varying bids lodged, e.g. $93 million for Section 63, City Hill (the western open car parks) in 2007, with the huge highest bid, way above the one below it, greedily accepted by government, but with the site still vacant and the built outcome still unknown nearly eleven years later! That smacks of "land banking", which must not be entertained in any way. Innovation, and defensible departures from planning controls should not be ruled out in the design competition process, and the public needs to be involved in decision making via the above-mentioned government planning and design committee. The Sydney Cove Redevelopment Authority followed the competition methodology with great success (e.g. lower George Street's Old Sydney (now Holiday) Inn, The Regent (now Four Seasons) Hotel, and Grovesnor Place). In assessing competition entries, residential quantitative and qualitative standards need to be taken into account - they are currently at an all time low, threatening population health, and must be raised. Heritage is a major consideration in this topic, and Civic and Northbourne Avenue and surrounds are studded with places and buildings of great historical significance, particularly from the modern era. Developmental design proposals must address this in bids for sites. An example would be the brilliant but fading former Churchill House by Robin Boyd, on Northbourne Avenue, a building potentially threatened with demolition in this study. It must be preserved and refurbished in any redevelopment of the site and surrounds. An augmented Churchill House could become the new headquarters of the ABC in Canberra (keeping the broadcaster's convenient central location) with its current site earmarked for (preferably reduced density) nodal redevelopment in the Wakefield-Macarthur Avenues precinct. Competition entry and judging conditions must be thorough and strictly controlled, for instance along the lines of those prepared by the Australian Institute of Architects. Judges need to be independent professionals. (The brand new, single-storey pre-fab-looking "Canberra Park Resort" in the new suburb of Kenny, in full and harsh view from the Federal Highway in the approach to Canberra, is an example of poor controls on design and siting - plant trees fast!) **6. On a related issue - A better plan for extending light rail south from Civic [if we must]. (Reinforcing planning, and looking beyond "land economics")**

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	Light rail cannot legitimately go on just one of the two matching central lake crossings, such as the Commonwealth Avenue Bridge, as proposed in the study, because the twin iconic bridges need to express themselves strictly identically and symmetrically (think of the view from Capital Hill) , and to have trams on both would be stupid, because they converge. As well, the bridges were not necessarily designed to accommodate modern trams, and economical and practical overhead wires, powering them, are not permitted on these bridges for aesthetic reasons, adding to the already ballooning cost. If the puzzling madness of trams is to continue, or in any case, we should look to Griffin's missing central lake crossing. It would take the form of a gently curving (circular, as in Griffin's plans) medium-height, car/tram/bike/pedestrian (no trucks), speed-limited bridge, springing from lower Lawson Crescent on Acton Peninsula to the south of the Institute of Aboriginal and Torres Strait Islander Studies, and making southern landfall tangentially on a significantly-increased-in-area Lennox Gardens, the new shoreline of which would follow the curve of the bridge in plan. It would be better and cheaper to construct the new bridge than to try and integrate trams into Commonwealth Avenue Bridge and notably, its complicated approaches. This new crossing: • Preserves the Commonwealth-Kings Avenue Bridge form and symmetry; • Because of its detachment, could accommodate overhead tram power cables aesthetically; • Preserves the integrity of the Acton Peninsula land form (by not having a once-proposed intrusive bridge protruding off the end of it - never in Griffin's plans); • Completes his circular form of West Basin to the south; • Does not interfere with the yachting course in West Lake; • Enables low-profile working, tourism, recreational, and competition craft to pass under; • Provides much needed connectivity between Civic-Acton, Parkes, the Parliamentary Zone, and beyond; • Stimulates a better, more lively development plan for the peninsula and the adjoining ANU land, possibly including a landmark hotel on the peninsula (expressing Griffin's built scale there), and a convention centre at the western end of the Water Axis; • Delivers new good circular-edged, sunny, north facing Lennox Gardens lakeside reclaimed land for recreational and other uses (not apartments) - far better than the currently proposed West Basin apartment-compromised, south-facing, City to the Lake pedestrian precinct, which relies on the engineering-heritage-disrespectful and hugely expensive vertical duplication of Parkes Way; • Provides better, safer, more attractive and interesting pedestrian access from say, City Hill to the Parliamentary Zone, than via the fraught Commonwealth Avenue; and notably, • Is not ruled out as "no longer relevant or not recoverable" in a detailed analysis of Griffin's proposals, contained in the NCA's comprehensive 2004 study The Griffin Legacy. In this third-crossing scenario, land reclamation from the lake in West Basin could be scrapped. The new curving shoreline of Lennox Gardens would result in more than double the area of the existing gardens footprint, and match Griffin's lake-edge profile there.

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	The new exciting bridge, and the pleasure and recreational facilities of New Lennox Gardens, including say, a ferris wheel, an aquatic centre, bike hire centre, food outlets, car parking, and so on, would be appropriately located outside the National Triangle, but would certainly be of it, in the same vein as the National Museum's strikingly colourful post-modernist structures. If the Woden tram eventuates, in this scenario, the line should leave Northbourne Avenue at the Alinga Street stop (because the all important precinct between the Sydney and Melbourne Buildings should be free of trams, so that the carriageways there may be taken into the middle, thus enabling significant widening, landscaping, and enhancing of the sidewalks for uses relating to the historic buildings, and making it easier and safer for pedestrians to cross the road there - see plan of this in The Griffin Legacy). Then the tracks would turn south into West Row, and travel a short distance around London Circuit to Edinburgh Avenue, then to stops at vibrant New Acton, ANU South, and Museum, and on to the above-described lake crossing. From a stop in the new enlarged Lennox Gardens, it could travel to the Parliamentary Zone, and then on to Woden. Because of its new connectivity with Civic (and Parkes), the expanded Lennox precinct becomes a far better "City to the Lake" solution than the current dismal, expensive, and compromised West Basin one.
36	I read about your plans in Canberra Weekly to turn Northbourne Avenue into a pedestrian boulevard as part of the Gateway project. My reactions and resulting questions are as follows I have seen some idiotic proposals but this must be up there with them for the Bill Harris Memorial Shield for Territory Government folly. Northbourne Avenue is the arterial road connection to Civic for North Western Belconnen presently. Ginninderra Drive connects North Western Belconnen via Mouat Street to Northbourne Avenue. Belconnen, the largest satellite city, grew by 4.4% during the last census period and its growth is expected to increase further over the next ten years with 10,000 homes being released on the CSIRO land between the Barton Highway and Owen Dixon Drive. The approximate 40,000 people who will occupy these dwellings will have to drive mainly and Ginninderra Drive will carry them to where, a pedestrian wonderland. Belconnen will also grow from the 3,000 dwellings proposed for the UC and the 10,000 dwellings from the Ginderry development. So all of this development some 23,000 dwellings are to be sited in North Western Belconnen. I recently FIO'd the traffic studies for the impact of Ginderry on Ginninderra Drive and its described an additional 10,000 car movements daily or three to four extra lanes of traffic from that development alone. What is even more gauling is that the Lightrail will not be extended to the largest and growing satellite city, Belconnen as described above, as the second stage rather, it is going to Woden!! You are now proposing the loss of North Western Belconnen's main arterial road Northbourne Avenue, to the City. I would recommend that you offer the opportunity for much wider consultation than just the inner north (as currently scheduled and who will benefit most from the proposal) to Belconnen residents who again stand to bear the brunt of the future development in the city together with losing vital arterial transport links (Northbourne Avenue) and no lightrail in site.

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	Maybe you could also explain how the gateway proposal serves the rest of an integrated transport plan for the city and in particular Belconnen. For example, What are the arterial road alternatives for North Western Belconnen? When is light rail due in Belconnen if ever?? What is the envisaged capacity of any future extension of Lightrail to Belconnen? Will it replace the capacity of Northbourne Avenue? If not, why not?? The gateway merely seems to be for the vested interests of those in the inner north. Given the absence of information for the above I would suggest that the proposal fails basic transparency tests and as a result be reconfigured for a holistic picture of the city's future which recognises that North Western Belconnen's future transport requirements now.
37	I wish to provide feedback on the proposal. As a long-term ACT resident, with a an apartment in Turner, the most important factors are to preserve Canberra's unique ambience and livability as well as to improve the build quality of new residential housing options within the city. I fully endorse and welcome increased density in the inner north (and other areas of Canberra) which provide a greater range of housing options for different needs and family configurations. But far too many apartment blocks with extremely poor design and build quality have been permitted. The water ingress problems at many blocks are well-known. But the problems go well beyond water. We should be able to do far better.
38	You need to provide several pedestrian and cyclist bridges over Northbourne Ave as part of this framework. These are particularly necessary in the city centre, and in the Turner/Braddon area (given the high density of pedestrians and cyclist heading to and from the ANU).
39	I'm a resident of Downer and just leafed through the Gateway Framework. Overall I'm very impressed - at least in terms of the broad aims and priorities of the plan. I was especially pleased to see the commitment to expanding and upgrading the bike path network in the inner north. On that, I have a question and two points to make. My question concerns Figs 11 & 12, which concern the bike lane on Northborne. If I understand correctly, Figure 12 represents a "second stage" of the development of this lane. This is also indicated by Fig. 15, A & B where B is described as "final stage". I'd like some clarification as to why this objective is being pursued in two stages - this surely will substantially increase the overall cost, and it also incurs the risk that the second stage will never be attained. If there are other considerations in play, I'd be keen to know of them. All things considered, I'd urge you to go the "full monty" from the outset. I see this as a once in a generation opportunity to nail the most important part of Canberra's cycle infrastructure. My point concerns the kinds of materials used to construct cycle paths around Canberra. The most common material is a kind of asphalt, which of course is pretty typical around Australia. In parts of the cycle network in Canberra, however, this seems problematic because bike paths are constructed very close to trees with extensive root systems. Though smooth when constructed, such paths are soon tormented by roots. Here is an anecdote for you: where there is an option, I and other commuter cyclists will often ride on the road parallel to such a path rather than the bike path itself. I would thus urge you to consider the construction concrete bike paths. I suspect they will get much better usage than asphalt and will also be more durable. I suspect cost considerations are at play here, but a few high quality bike paths that get high use, and which are gradually expanded, is surely better than an extensive network that does not get high use and requires constant repairs.

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	The second point concerns the "Garden City" cycle route. It's an excellent idea; bravo. Regarding its course in Downer, it may be work considering adding a leg that travels from Melba Street down Swinden Street, terminus the light rail station. This would encourage residents from across Downer to ride their bikes to the light rail, rather than be dropped off in a car, inevitably causing congestion.
40	My proposal reaches beyond the formal entrance to Canberra on the Federal Highway. Nonetheless, I would like to propose it. Commencing at the turnoff from the Hume Highway onto the Federal Highway, it would be good to have signs from there on right up to the formal entrance to the ACT. The purpose of the signs would be to inform visitors to Canberra of the Delegations that Canberra hosts. The wording on each sign would need to be minimal but could include: Name of country Type: Embassy or High Commission Flag of the country There could be a standard heading on all the signs like: CANBERRA IS PRIVILEGED TO HOST: A series of signs like this would be educational for children and adults and even fun for children to watch out for as they come to the end of the long drive. It would also be good to have the same signs on the Barton Highway commencing at the Yass turnoff and on the Monaro Highway.
41	A few observations about the recently released Gateway strategy for Northbourne Avenue: • One of the fundamental assumptions of the strategy is that there is a sense of 'arrival' at Civic for travellers. • 'A traveller's first perception of a city's character is gained upon approach and arrival.' pg 5 • 'establishing a clear and identifiable route from the boundary to the symbolic centre of the city, by providing visual cues and strong structural links, for example, avenue planting.' Pg 6 The gateway corridor however is proposed to change the transport heirarchy with private vehicles being lowest and being positively discouraged. The Strategy suggests that private vehicles will be encouraged to use arterial roads such as the Parkway for trips (this would include travellers and visitors presumably). If visitors and travellers (particularly those arriving by vehicle) are being directed away from Northbourne Avenue anyway there will be no sense of 'arrival' which seems to subvert the grand boulevard, entrance to the city theme. Why have the grand Strategy if no one is actually 'arriving'? Apart from light rail passengers and cyclists (both of which I support by the way) arriving in Civic, I am struggling with what seems to be a contradiction. No private vehicles means no arrival for visitors who will be entering Canberra via arterial routes. The Introduction (pg 5) also refers to human scale public places. The rest of the document then proceed to identify increased building heights which not only detract from the current human scale of Canberra but undermine the whole 'garden city' tenet.

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	With regard to the building heights proposed for Downer in particular, the proposal to increase the building heights to 6 stories on Northbourne Avenue with 4 stories in the adjacent street appear to me to be too high. The outcome would lead to four storied buildings on one side of the suburban street and single stories across the road (on the eastern side of the street). I would suggest reduction of the proposed heights by one to two stories. Downer as a residential suburb needs a more graduated height transition. In addition, the traffic increase in the streets adjacent to Northbourne Avenue with such high density apartments would significantly reduce local amenity. The existing street is a relatively narrow suburban street and could not cope with traffic densities that would be the outcome of 6 and 4 storied apartment buildings. The Strategy document notes that Downer and Watson will be the subject of an investigation in the longer term 'to determine appropriate land use zoning and built form controls to identify how these areas could be redeveloped in the future consistent with the vision for the city and gateway'. Pg 22 Residents need more clarity about the time frame. That is, how long is long term and short term to enable residents to plan their future. Given that these suburbs have now been identified 'post hoc' for potential redevelopment by dint of being in the Gateway corridor, residents who purchased property on the assumption that a residential suburb will remain a residential suburb need to be advised if there is a likelihood of much higher density neighbourhoods. These suburbs represent examples of the garden city ideal that the Strategy purports to maintain. I would maintain that these suburbs already exhibit the characteristics sought by the Informal Park Boulevard and the investigation appears to be furthering the opportunity to simply increase population density in these suburbs. It occurs to me that the adage 'if it ain't broke, don't fix it', applies. I note the comment on page 2 'Over time, there will be privately leased sites that may be considered for rezoning for mixed use development to enable more diversity in land use.' I would like reassurance that this is not bureaucratic code for targeting Watson and Downer for rezoning that would destroy their current suburban use and amenity. I also note on page 14 that the Northern Investigation Area already has earmarked up to 8,000 new dwellings. If this is a proposed Investigation Area, how has the Strategy already earmarked a number of potential new dwellings. The implication I take is that Watson and Downer are already pencilled in, prior to any 'Investigation', for an increase of up to 8,000 new dwellings. I'd be grateful for an explanation how such a number has been arrived at. The Built Form Intent (pg 23) notes: Ensure high quality landscaping to the secondary road interface, thereby extending the Park into private development. Downer, in particular, already represents a landscaped environment as a leafy and tree lined suburb. While acknowledging the future need to consider higher density accommodation I fear that the erection of a series of monoliths and increased building heights along Northbourne Avenue will make North Canberra less liveable. The Strategy vision states: 'A renewed city and gateway corridor will create a distinct sense of arrival in the National Capital and Canberra's liveability will continue to be highly recognised nationally and internationally, promoting our city as a place for business, education, art and urban culture.'

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	Having been closely acquainted with the outcomes of the architectural vision of the 60s while living in England, I fear that we may be pursuing a similar path where amenity and liveability - both of which we have already have in evidence in Canberra - end up being casualties of a poorly focussed vision. We run the risk of turning the boulevard into a concrete canyon. This would be a travesty against the garden city.
42	I have some reservations about the proposal for the Northbourne Corridor. Many of these were addressed by my husband, in his recent submission. But I would like to express a few broader, big picture concerns. My main concern is that we are at risk of jeopardising the very thing that makes Canberra unique ... the current garden city, low skyline ambience. This is what so many residents love about their city ... and what visitors find so refreshing and good as well. Why would we allow that to happen? Why compete with Sydney or Melbourne for high rise status when we have such a uniquely, beautiful city? The other think I don't quite understand is the plan for increasing heights as we progress south, towards the Sydney and Melbourne Buildings, so that visitors get a sense of having 'arrived' in the city centre. Surely there is a certain redundancy of this need if the Northbourne corridor is mainly for the use of public transport, with private vehicles being encouraged to use alternate routes? I really think this sense of 'arrival' could be achieved in other ways ... signage? sculptures? something artistic? I think any of these options would be more appealing than driving through a canyon for 5 kilometres? The other thing that concerns me about high density living along the corridor is not unique to this particular development, but applies to high apartment living per se. The cost of these living conditions to mental health and general well being is great. Of course I realise we have to have some of these sorts of dwellings ... but I think we need to exercise caution as to the number of apartment blocks we construct. Short term construction is easy ... but the long term health and well being of it's population should also be a serious consideration for every government.
43	I have the following comments on the plan: • I support the re-use of the open car parks; I would like to to see some of them returned to green site given and not all used for development; • I support the reduction of the lanes along Northbourne Ave and better cycling conditions along that corridor; plus more landscaping! • In theory I support the village concept but I can't see how it can be meaningfully created at traffic intersections; do planners ever consult experts in human behaviour because I'd be surprised if any sociologist/human behaviourist would think a meaningful 'village' could++= be created in a space as suggested int his draft plan; • I support the increase in building heights along the light rail corridor 8-9 storeys but not sure about the +10%(???);there should be no buildings above 9 storeys; basically agree with Gateway Sequence; • I like the Landscape concepts and design elements; • Northbourne Plaza I like; • Haig Park revitilisation I have already participated in the consultation process;

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	• Support anything that benefits O'Sullivan's Creek.
44	We've just moved into the city of Canberra in just over a year ago because we loved this part of the world and it's 4 seasons. Sadly though in that year we've seen improvements and much destruction with the removal of the gum trees and the loss of green spaces which made Canberra attractive and true to it's name of being a 'The Bush Capital'. We understand that there needs to be progress and an 'update' to facilities to facilitate for an ever increasing population. A government therefor should be more then ever fighting to protecting all the current 'green' spaces and not allowing encroachments and building onto these spaces thus allowing for the population increaser or are the planners seeking to make a concrete jungle with less green spaces then presently exist? For this reason, we find "the proposals" more in keeping with an European city and not our beloved 'Bush Capital'. I see some of the proposals as spoiling the real spirit and original design concept of Canberra. An example of creating a concrete jungle is the encroachment of the ACT Court expansion onto Vernon Circle, it's now very imposing structure onto our beautiful City Hill and the openness that once graced the area has been lost somewhat as is the car parking being presently constructed. How can anyone think that is beautiful? The openness is being lost to our society and further expansion around Vernon Circle a great tragedy. Also, we are at a loss as to the planning of Northbourne Avenue. As the only major road to Parliament House from outside Canberra why would anyone plan to restrict and bottle neck traffic movement with some of the proposals in the pipeline? Please make it your mandate to protect all the open green spaces we have presently and not to consider designed buildings and structures or car parking to be built onto them
45	I wish to make some comments on the City and Gateway Draft Urban Design Framework (the Framework). I am basing these comments on a thorough reading of the Framework, a presentation I saw from some ACT government planners at my local community association, and a brief chat I had with one of the planners following this presentation. I should preface my remarks by stating that I think the Framework is an impressive, forward thinking and accessible document. I support its intent: to improve the visual amenity and land use of an important gateway to our city. Parts of the Federal Highway-Northbourne Avenue corridor are very run down, and in need of rejuvenation. And with the advent of light rail, it's clear that the corridor needs a new plan for the next few decades and beyond. This should include greater density and increased building heigh limits. I am also really excited to see a proposal for a bikeway on the eastern side of the city/inner north. Canberra has an embarrassingly high level of car dependence and anything the ACT Government can do to encourage more cycling, especially in the inner north/south, is a good thing. That all being said, I'll keep my comments fairly parochial, to Downer, where I live.

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	At page 23 and 28, the Framework proposes to increase building heights along the western side of Downer (facing the Federal Highway) from 8.5m (two storey) to 18.5m (six storey). My concern is that the drafters of the Framework have mischaracterised Downer as having a slip lane (or 'Access Street' as it's called at page 23) along its entire western side. This is not the case. A little more than half of Downer has such an access street (Panton St) running from Antill St to just opposite the Barton Highway. While it will be a big change, I think it is appropriate that building heights along Panton St be increased to up to 18m, especially if it means we can find better land uses for that street than those ghastly bed and breakfasts. The Framework proposes to change building heights at the rear of Panton St to 12m (or up to four storeys). This to me seems as high as you would want to go, considering the other side of the street is zoned RZ1 and is nearly all one-storey dwellings. Any higher that four storeys would start to look lopsided. I note that much more central locations, such as Forbes St in Turner, seem to have a height limit of three storeys on their eastern side. The Framework suggests that the new 18m limit should be applied beyond Panton St and all the way up through Banfield St, which does not face onto the Federal Highway and is currently zoned RZ1. I hope this is a mistake, because I think it would look very strange to have six storey buildings opposite one storey buildings. Have a quick look at Google Maps - Banfield St is very different from Panton St. It is set much further back than Panton St. Instead of simply complaining, I wish to offer a positive suggestion. Height limits on the western side of Banfield St should be increased from the current 8.5m (two storeys) to 12m (up to four storeys). This would make sense given that 1) Banfield St does not face onto the Federal Highway, 2) six storey buildings on one side of the street and one storey buildings on the other side will look out of place, and 3) densification near the light rail stations is needed and four storeys is sufficient for this purpose. There should not be any concerns with there being a lack of uniformity in building heights between the Lyneham and Downer sides of the Federal Highway, because there is already a lack of uniformity that can't be resolved on account of there not being a slip lane for the whole of Downer's western side. That is of course unless the ACT Government is proposing to install a new access road behind Banfield St? If that is proposed it certainly isn't in the Framework and should be communicated to residents as soon as possible. It's also worth pointing out that the Framework proposes different building heights opposite Watson (8.5m on the Watson side and both 12m and 18m opposite). I think what I've suggested is reasonable in the circumstances. It addresses the need for greater density near light rail stations while acknowledging the fact that there is an existing suburb in Downer and building heights should be graduated based on their proximity to the Federal Highway.
46	Upon reading the Gateway Draft urban design framework I note there is a mention of RL 617 along with building heights in metres and storeys. But there is no explanation of what RL 617 is in the document. We know that RL Reduced Level is a survey measurement for the ACT of the Australian Height Datum AHD but the community doesn't how it relates to building heights. This needs to be explained better to the community also along with a diagram. It also needs to be pointed out why RL 617 is important for Civic and central Canberra but not so important for the Canberras other major Town centres.
47	I used to live in Sydney and the one thing that astounded me was how Canberra is so symmetrical. Walter Burley Griffin planned this and I believe that parts of Canberra are not following this. I believe that the route into Canberra should have symmetrical tress and lush, green mowed grass in the middle and

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	sides. To achieve this, we should investigate what grasses do not grow quick and are drought tolerant. Heavy density urban ares should have more trees to reduce heat.
48	We are very concerned at the apparent reduction in width of Northbourne Avenue from 3 lanes to 2 north of Antill Street, and possibly continuing further south. It was not clear that this was in the pipeline when the tram was being proposed. With the increase in population and people needing not only to get from north to south, but also east to west, we will have huge intersection back-ups because traffic will not be able to proceed at a reasonable pace along Northbourne.
49	Surely 37,000 people in this small area is lunacy. The originally estimated capacity of 11,000 people would cause massive problems. 37,000 should be unthinkable. We have a capital city the envy of the world and Andrew Barr wants to turn it into a crowded city ghetto. This is a blatant money grab. An exercise based on greed and ego. Congestion on Northbourne Avenue will be appalling. Visitors to Canberra will very quickly learn to avoid Northbourne Avenue and enter Canberra from other directions. Parking will be a huge problem. Do you honestly believe that the majority of these 37,000 people will not want to own a car? Aesthetics are a terrible worry for me. Will there be green open spaces? I doubt it. On past performance by our planners We can probably expect shoddy, ugly high buildings. A canyon of cement. The high rises on the Mouat, Antill, Northbourne intersection are probably only a taste of things to come. They make me ashamed of our Chief Minister, his planners and his developer mates, every time I see them. I assume our concrete canyon entrance avenue will look even worse than the appallingly ugly drive into Gunghalin along Flemington Road. The proposed density and the total lack of imagination we have come to expect from Barr's planners and developers would make it look even worse that the soulless, multi storey cement jungles that pass for suburbs that have sprung up in Lawson and Coombs. The poor planning and shoddy construction practices Canberrans have been forced to expect will ensure the proposed “gateway” to Canberra will become a run down area of squalor in no time, with nothing to recommend it. Please stop Barr's blight on Canberra. Stop this poorly planned development madness I would suggest our A.C.T. Government look at other developments overseas that include parks, open spaces and other urban greening strategies, and a variety of dwelling types that all show imagination, liveability and good aesthetics, but our Chief Minister has already spent tens of thousands of rate payer dollars on junkets overseas. Maybe he could just use the internet for investigation and inspiration. Oh, and remove the dollar signs from his eyes Stop the madness. Stop Barr's Blight. Once what we have in this beautiful and unique city is gone, it is gone forever. All in the name of greed And yes. I’m one of those “old” people over 45 with 1940’s thinking that Andrew Barr despises so much, but I prefer to think of myself as less afflicted with ego, greed and arrogance than Our Chief Minister

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50	This may not have anything to do directly with this project, but I have noticed that the new 'Welcome to Canberra, Sister City of...' decorative sculptures provided on the median at the entry to the ACT from the Federal Highway (after Eagle Hawk motel) are not illuminated at all. While they look good in daylight, they look like tall, shadowy figures in the dark conveying foreboding instead of being welcoming. I hope you address this.
51	Old Canberra has been left with a wonderful heritage provided by the original designers of Canberra when they planned and developed the inner suburbs of Canberra as villages each with their local shops, amenities, tree lined streets and green spaces which give these suburbs a strong sense of community. We already enjoy a village life. This heritage should be respected. Will these units have enough parking provided for tenants or will vehicles need to park along the verge causing damage to infrastructure and trees as happens in Majura Avenue? The streets in the inner suburbs for the most part are reduced to single lane if vehicles park on both sides. Will there be enough energy to supply these new buildings as they will all need very costly to run electric water pumps in their underground parking areas to clear the water and to pump water to the apartments? Some of these buildings will also require their own sub stations to power the buildings. They will all need to be air-conditioned. Many studies have shown that multi-storey buildings are less energy efficient than a single dwelling and they generally cover the entire block of land leaving no room for vegetation. A recent CSIRO report, Mapping surface urban heat in Canberra commissioned by the ACT Government identified neighbourhoods that are hotter due to the 'urban heat island effect'. Neighbourhoods with tree canopy can be 13 degrees cooler on a hot summer day. Will Northbourne Avenue become a wind tunnel? Northbourne has already lost the feeling of space and its vista on the corner of Northbourne and Macarthur with the extension to the hotel. Over the years buildings on Northbourne have had their set-back requirements reduced creating a tunnel feel which is more evident since the removal of the trees. If Northbourne Avenue is narrowed as well, which road will the many extra vehicles created by this development use? It has been suggested that we will be able to use the parkways and arterial roads. Can you tell me where the parkways and arterial roads are in the Dickson area other than the lovely Limestone Ave. Can these inner suburbs support more shops without taking business from the existing shopping centres? For some time now Dickson has had several empty shops. Will there be plenty of parking at these new shops? I asked myself who benefits from this development and I have concluded that the tram line was built to enable developers to make maximum profit from the rebuilding of Northbourne Avenue and the Government agreed to this so it could increase its income by increasing the number of ratepayers. I suggest that the new tenants of these buildings and the developers should pay for the tram line because they are the benefactors. The great cities around the world do not demolish their heritage. I can't see Paris redesigning its main boulevards anytime soon.
52	I recently met staff from ACTPLA on the information tour at Lyneham shops. I am of the opinion that Owen Cres should be upgraded from the RZ4 rating to a higher rating for the following reasons: 1. North Canberra is the gateway to Canberra. First impressions count. At present it looks like a country town as you enter the CAPITAL of Australia . Two and three level unit complexes won't change that image much. Lets go for a big city look especially as Owen Cres is 1 street back from

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	Northbourne Ave, and part of Owen Cres is actually visible from on Northbourne Ave. Why differentiate between the part east of De Bourgh and the part west of De Bourgh? 2. Macarthur Av area is going to be a major train stop with an upgraded precinct. Lets make the area buzz not do things half heartedly. 3. I currently rent out [….]. I used to live there a couple of years ago. Recently I went to the green reservoir area behind Owen Cres. It's still under utilized. Why spend all that money on the park set up and maintenance but have it under utilised. I believe the area would be buzz even more if there were taller developments with more people going to the park to play and relax. Look at Central Park in New York. Beautiful Place!!! Currently hardly anyone uses park. Bring it to life!!! Better use of the green area. 4. If more people live near light rail. More people will use it making it more profitable! as well as buses etc. 5. Higher Developments means higher revenue for government lowering pressure on coffers and lowering pressure on raising other taxes. I believe ACTPLA should be bold especially in the Northbourne Corridor. I believe the future should be embraced not be scared of.
53	I just wanted to provide some feedback as a resident of the Inner North. This includes: 1. With pedestrian and bike crossings in the corridor, has thought be given to over pass bridges (or under pass tunnels) in busy intersections?. As the population grows these crossings are slowing traffic movement (e.g. Cowper street Dickson, Northbourne Avenue near Murdoch Street etc.). 2. Footpaths connecting to the light rail stops need to be wider to cope with bikes and pedestrians. With today's population it is already feeling very squished. 3. To become a more pedestrian focus model, road speed limits in the suburbs need to be lowered to 40 km 4. To make the area more pedestrian and bike friendly more roads need traffic calming measures in place. I live on [….] Downer and cars speed well above the speed limit on this street all the time. I totally support a eastern cycle path and the pedestrian first approach. Also, the high density housing along the corridor makes sense.
54	I’ve had a look through your impressively detailed document, but have been unable to get to one of the ‘meet the planners’ sessions. On the whole, the framework looks sensible, appropriate and gives confidence that there’s an overall integrated plan for what at the moment looks like a random collection of isolated developments along the Northbourne corridor. At this stage I have two comments: 1. I particularly like recognition of the need for pedestrian access between buildings through ‘mid block links’ (provided they don’t end up being dark, dingy, graffitied and littered). 2. I’m a bit worried about the reduction to two lanes of Northbourne Ave at the City Hill end – it’s hard to imagine where the cars will go, how the lanes will converge and whether this will result in traffic build up. 3. Good luck getting traffic off Northbourne and on to other routes! I look forward to the next stage of community engagement.

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55	I got an invitation in my mailbox to a Draft Urban Design Framework Community Workshop (DUD-FCW: say it quickly) on 9 April at the Downer Community Centre. I won't be there but here is what I'd like to say: 1. Past experience tells me you have already made up your minds and this is another exercise in sham consultation. 2. Downer used to be a pleasant place to live, but not anymore. The tram and the concrete canyon to be built for it to run in, the slum-built blockhouses of hideous disproportion, the great, raw slabs of multi-storey people-warehouses, of no architectural merit but of unspeakable ugliness, now staring at us and soon to be in our midst, the loss of trees, parks and open spaces, even the myriad smaller decisions such as to make crossing the roads more difficult and to replace bus shelters with billboards, have already taken away all civic and aesthetic amenity from this end of town. Money value is the only value left. This is, of course, what our corrupt Town Council and their Developer Mates wanted all along. On a scale from one to ten, I rate current plans for inner north Canberra a big, fat zero. Nothing you could do or say at this DUD-FCW could make things any worse along the road into Canberra from the north, so go ahead and do what your lords and masters have bid you do, and make a plan to pour cement over everything from Eagle Hawk to the lake.
56	We applaud the overall objectives and most of the proposed detail in respect to transport in the Framework document and particularly your restatement of the government's policy of a people first approach to the built environment and transport and its adoption in the Framework. That will enhance the active travel priority being adopted in Canberra. Some specific areas where we would like you to take action are given herein. **Proposed walking and cycling routes** The Framework shows numerous walking and cycling connections and routes: Map 10, Map 11, Map 12, Map 13, Map 16 and Map 17. Some of those routes exist now and some are new. [….] endorses the proposed routes and supports the Active Travel Streets concept for the quiet side streets (and has been in detailed discussions with the ACT Government as to the design of the two active transport routes parallel to Northbourne Avenue). **Protection of walking and cycling routes** It is vitally important that the existing and proposed walking, cycling and active travel routes (Map 10, Map 11, Map 12, Map 13, Map 16 and Map 17) be protected now so that your proposed framework can be implemented. You say the document is a 'planning framework' but failure to protect the walking and cycling routes and corridors will denigrate the final product. Some of those routes are under pressure now, particularity in the Dickson 'urban village' area and some currently proposed developments along Northbourne Avenue. They can be protected by including them in the ACT Governments Practitioner's Tool map and the Territory Plan. And somehow, you must get the routes considered in ever Development Application proposal for developments in the corridor. Our suggestion for protecting the walking and cycling routes: • Get all the proposed walking and cycling routes onto the Practitioner's Tool map as soon as possible (some are there now but many are not) – see http://activeinfrastructure.net.au/practitionertool/index.php • Advise the Development Application approving section, the Asset Acceptance section, Capital Works section, Roads ACT and anyone else involved in the development and design in the corridor about the routes and corridors and ask them to ensure that they are protected.

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	• As far as is possible, get them into the Territory Plan and/or related documents. • Do whatever else is desirable so that all involved in development know of the routes. **Priority for people walking and cycling** It is important that priority be given to people walking and cycling at intersection and mid-block (driveways). In the Framework document on page 50 under 'Vehicle Access' is the statement that vehicle access to sites (driveways) shall be located and designed to ensure pedestrian priority. That should include 'cyclist priority' too particularly when they are travelling on the off-road cycle paths along Northbourne Avenue. But it applies to the other paths and active travel streets. It is highly desirable that any driveways crossing cycling or pedestrian paths be ramped up steeply from the road to the path so that people driving across the path are advised that the path exists. People driving vehicles into driveways from Northbourne Avenue must be required to give way to any cyclist (or pedestrian) when turning, even if it holds up traffic behind them. That may require, at some locations, that the paths be moved away from the road edge (kerb) so that there is room for a car to move out of the traffic lane and stop in the verge without being on the paths. There is a design in MIS05 for this situation. **Traffic lanes on Northbourne Avenue** You show Northbourne Avenue as having two lanes in each carriageway sometime in the future. You need to be bold and make that happen now when it is relatively easy. There is no good reason to wait years, as proposed, to convert the current three lane carriageways to two lanes. That would involve twice relocating the kerb and road drainage and constructing the offroad cycle path. Many other cities that have embrace walking and cycling have cut a lane off their arterial roads and give the space over to people walking and riding with positive results. Northbourne Avenue has frequently been operating with two lane carriageways during the last 18 months due to the light rain construction activities. And as far as we know, the road network has continued to operate satisfactorily – remember that we cannot provide sufficient space for all the car trips we would like to make at peak times. Your 'strategic road network' section (page 49) says that there could easily be a 50% reduction of through traffic on Northbourne Avenue with little or no changes to the current road network – once the light rail is operational. The current bus stops on Northbourne Avenue and the number of buses using the road, means that in peak times it currently operates basically as a two lane carriageway for cars. When the light rail is functioning (late 2108) there will be no bus stops on Northbourne Avenue so keeping three lanes will effectively be widening each carriageway. Our suggestion for getting two lanes on Northbourne Avenue now: • When the light rail starts operation and the bus stops are removed from Northbourne Avenue, block off the kerb side lanes for say three to four months. You may need to keep three lanes at the intersections for bunching up of the vehicles and for turning. Cycling should continue in the current on-road cycle lane (and the blocked off kerb lane). Then observe what happens and, if there is no chaos (as we expect will occur), close the kerb side lanes and widen the verges with separated cycle paths behind the kerb – as illustrated in your Figures 5, 7 and 12 (pages 23, 25 and 48). • Alternatively, you could make the kerb side lane a bus-only lane now and remove it later when there are no bus stops on Northbourne Avenue. **Urban Village concept** We are satisfied with your proposed unban villages at Dickson and Macarthur Avenue. However for them to be successful, you must protect the walking and cycling routes therein as discussed above. For example, we know of one route in Dickson that is under attack by the proposed development on the car

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	park opposite the Woolworths store where the Development Application is currently with the Administrative Appeals Tribunal. That proposed development would effectively removed the walking and cycling area between the proposed development and the Woolworths store. We are hopeful that the Tribunal will prevent that area being ruined for walking and cycling. **Access from adjacent land onto Northbourne Avenue** As Northbourne Avenue is to be a 'people first' area, then motor vehicle access to and from the adjacent land must be restricted and controlled as shown in your Framework document (pages 50 and 51). Areas like that currently in front of the Jollimont centre and elsewhere where there are frequent driveways allowing relatively high speed turning must be eliminated. Vehicular access crossing foot and cycle paths must be minimised or, better still, eliminated. **Bicycle parking** Sufficient bicycle parking should be provided as outline in your Framework document. For that to happen along with other developments, it is important that you get the requirements integrated into the Development Application approval process and related activities as soon as practicable. **Parkland along Sullivans Creek** Your discussion of the parkland along Sullivans Creek only addresses that section south of Mouat- Antill Streets. However, Sullivans Creek, and the associated park lands, extend to the north of Mouat Street and we consider that sould be included in you Framework – that includes Southwell Park and Yawoni Golf Course – so that they get preserved. Your Map 15B (page 51) shows some 'recommended future street connections' within Southwell Park and the Yowani Golf course areas. This is concerning if your are considering roads within the existing green spaces. We can see no future requirement for any such roads. We would appreciate some explanation as to what is proposed there. **Storm water infrastructure augmentation** With the increase in the paved area within the corridor it is important that the existing storm water infrastructure be augmented to adequately cope with the proposed changes. It would be great if a substantial portion of the Sullivans Creek (the main catchment for the whole area) were to be changes into wetlands (al la the O'Connor and Lyneham wetlands) as illustrated in your Map 18 (page 60). **Active Travel Infrastructure Standards** It is important that there is consistency of infrastructure standards across Canberra when it comes to active travel. The ACT Government has a suitable set of standards (MIS05 and related documents and drawings) and they should be applied in the area covered by the City and Gateway Framework – and elsewhere. The ACT Government's 'Planning for Active Travel in the ACT' in Section 6.1 says the Government will seek to get the NCA to work with the principles of MIS05 and other elements of the Active Travel Practitioner Tool. [….] endorses that objective.
57	I have looked at the proposed plan. I am happy to see increased densification along the corridor. However I would like to see a variety of high quality apartments where you can't hear your neighbours, with decent balconies, oriented to the north (not just running east/west and baking the people inside), offering cross ventilation and offering the possibility of living in a real home, not just boxes built to be rented out. I would like to see a diverse

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	landscape. Several kilometres of largely identical 6, 11 and 15 storey blocks of apartments would be a horrible. Interest comes from diversity – both of building types, styles and heights – maybe with a bit of green space and retaining some of the current buildings. It would be a great shame if the entrance to Canberra turned into a long canyon of flats. It would confirm all the prejudices held about Canberra, as being tediously boring to look at. I also want to see proper trees. Decent sized ones – not some poxy 8 metre ones. There needs to be room for them on the sidewalk. The area around Macarthur is listed as medium density development. So far what is happening there is just a load of flats of variable quality. Next to no town houses, terraces or houses on smaller blocks. The City Edge development in O'Connor should serve as model for the type of medium density housing that people actually want to live in. It provides mixed types of housing and tenures as well as social housing. The houses are almost never for sale and this is because they are desirable places to live in – it has 86 apartments, 12 terrace houses and 25 town houses, green space and enough parking so that you don't have cars parked all over the nature strip killing the street trees.
58	I am very sad that Canberra has decided it is NOT the bush capital and will become a faceless facade of highrise along Northbourne Avenue, especially the proposed very high rise at the corner of Macarthur and Wakefield Avenues. Developed nations around the world have decided that urban planning best practice is NOT high rise development such as this. This type of development is alienating for residents, there is lack or no communal green space or options for community interaction. In addition, the proposed developments will overshadow and intrude into the privacy of existing residential developments in this area. This is VERY disappointing. Who is going to live in these glass towers? We are being told that units are not selling in Canberra, there is already a glut. Could I respectfully express my opposition and disappointment with the proposed high rise development. Could we have trees back in Northbourne Ave - the city end is already looking extremely UGLY with recent developments. Remember why people want to live in Canberra - it's not to live in a high rise! It's to enjoy the open amenities and accessibility of the bush capital.
59	Keep it low rise. It used to be very attractive driving into Canberra, but now with the removal of the trees and the light rail it is ugly. Add high rise and it will be more depressing than it has become.
60	I am in favour of high density along our city's major public transport corridors, as long as it is balanced with requirements, and enforcement of, quality design, quality construction, and open space with decent shade trees. If this balance occurs, then it would make sense to have height limits even higher than those proposed, such as 15 storeys along Northborne, and 18 storeys within the urban village precincts and south of Haig Park. There is also an opportunity to explore high density options north of the Federal Highway, where there is land along the light rail corridor, but no existing residents whose properties would be negatively impacted by such development. Also, if Canberra were still contemplating a new stadium, the NE corner of the Federal and Barton Highways would create something of a sports precinct given the proximity of the Lynham playing fields and Thoroughbred Park.
61	We are excited to witness one of the most significant infrastructure and urban revitalisation projects in Canberra's history.

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	The draft framework, jointly developed by the ACT Government and the National Capital Authority (NCA), rightly recognises potential for growth along Northbourne Avenue and the Federal Highway. Our property, which is slightly over 1,500m2, is the largest single residential block on the light rail corridor and is directly adjacent to the proposed Phillip Avenue station. We note that on page 14 of the framework, our property is within areas identified as the 'Northern Investigation Area', 'Informal Park Boulevard', and a proposed 'urban village', which has the potential for an additional 8,000 dwellings. This is very encouraging. However, page 18 of the framework also notes that a 'node of taller buildings' is proposed for the Phillip Avenue and Federal Highway intersection, on the Downer and Lyneham sides only. Page 22 suggests that changes to planning controls for Watson are not proposed in the short term, but should be considered in the long term. Despite its size, and its prominence on the light rail corridor, our block is currently zoned 'RZ1' and does not appear to be within the area where taller buildings will be permitted. This limits the extent to which our block can contribute to light rail project and the vision for increased housing densities along the transport corridor. We urge the government and the NCA to give serious consideration to changing existing planning controls for Watson as soon as possible. A swift decision to change the planning control in Watson will truly maximise potential light rail usage and, equally importantly, provide existing residents with clarity and certainty about potential future changes that will directly impact their living conditions and potential future decisions about extending, rebuilding, or selling. The proposed redevelopment of the Canberra Technology Park (Canberra Academy of Interactive Entertainment Ltd.) also means there is significant benefit to be gained by rezoning all of section 1 Watson. Based on our rudimentary assessment of our immediate surrounds, there are approximately eight addresses in addition to ours where a side or rear boundary is shared with the Federal Highway, up to the intersection with Flemington Road (blocks: [….]. These blocks appear to be occupied by individuals living alone, couples, or small families (my wife and I are the only two people at our address). We estimate that this equates to approximately 20 people, living on an area of land totalling around 7,000m2. All of these blocks also appear to be within the Northern Investigation Area and, while not proposed to be within a node of taller buildings, they have the potential to increase the number of light rail users, if the zoning conditions were to be amended to allow increased development and dwelling heights, like those proposed for nearby parts of Downer and Lyneham. Furthermore, if the abovementioned blocks in Watson could be rezoned and possibly redeveloped, all access could remain unchanged from the three existing cul-de-sacs (McCawley Street, Adams Place and Cooper Place) negating any need to alter road infrastructure, such as pictured on page 16, where a service road is suggested south of Stirling Avenue (presumably behind our property and all of those mentioned above, plus more). Pages 28 and 29 propose node heights up to 22m for the Downer and Lyneham sides of the Federal Highway – Phillip Avenue intersection. Map 6 shows other heights on all sides of the intersection (except for the Watson corner) will also be able to be developed up to 18m. This means that only three of the four corners of the intersection will be able to be developed, limiting opportunities to achieve the symmetry, sophistication and refinement articulated in the framework, at the start of the gateway and at the first station along the Federal Highway. Page 43 of the framework also indicates that an 'urban village' will be developed on each corner of the Federal Highway – Phillip Avenue intersection. This too sounds very promising, yet the framework contains little description about what the village will comprise at this intersection and what it will mean for existing residents. It may be prudent for any planning relating to the urban village to also address the vandalism, graffiti and general condition and

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	appearance of current fencing along the Federal Highway (most of which is very poor and does not present a vibrant or welcoming image to visitors to the capital or commuters using the light rail). Additional detail would also be welcomed regarding any proposed improvements to pedestrian and cycle infrastructure along the light rail corridor, particularly guard rails, bollards or walls, to protect walkers and riders from traffic. At present there is no information available about what form this will take, or if it is included in current plans. The cycle path on the Watson side from Phillip Avenue to Stirling Avenue is in disrepair and, in some places non-existent, leaving users exposed. The addition of a small number of trees to the section shared with the light rail corridor will take many years to mature and are an inadequate long term solution to ensuring the safety of drivers, riders and walkers. We acknowledge that Canberra's population is growing and the community's needs are changing. Canberra is ageing, household sizes are declining as modern lifestyles evolve and there is demand for a wide choice of affordable and sustainable housing. We wish to be an active and positive part of the change and welcome further discussions with your office and/or relevant personnel within your directorate to harness the potential of our property, to better contribute.
62	**Initial Observation** We provide input on the City & Gateway Draft Urban Design Framework. We were unaware of Stage 1 of Consultation, possibly as it occurred in "January" 2016 - a poor month for community consultation, and possibly why response numbers were extremely low overall. According to this Draft Framework, it appears the residents in the suburbs either side of Northbourne were considered as the sole "stakeholders" here. Northbourne Avenue is a vital road link for many Belconnen residents (25% of Canberra's total population live there) – so why has there been no consideration of this fact addressed in the Draft? At present Northbourne Avenue is a route (if rat running is to be avoided) that much of Canberra's population must travel on, at some point, to reach a destination. In particular, Belconnen residents connecting to the Federal Highway, Sydney, south coast and beyond! Horsepark Drive is not a connecting "ring road" and would certainly not be environmentally sustainable. "Changes to Canberra's wider road network . . ." – is this in addition to the "peripheral parkway system" of Gungahlin/Tuggeranong & Majura Parkways? These current roads provide a very limited alternative to avoid Northbourne Avenue for motor vehicle use in reaching a destination – light rail will not resolve this problem! The parkway system has no linkages and is not sustainable as it is. **Diverting Traffic away from Northbourne** Currently, traffic is being diverted away from Northbourne, due to the light rail construction. This is creating issues now, eg, the peak morning traffic flow from Glenloch interchange towards Russell/Fyshwick is still moving very slowly at 9.30/9.45am (peak should be over by then) – does this not suggest the parkway system is failing already? There appears to be increased traffic on Kingsford Smith Drive possibly from Gungahlin/Barton Highway towards Glenloch, where traffic from Woden, Weston Creek and Tuggeranong is all converging! Roadworks are an ongoing hindrance to traffic flows and it's worsening. **Buses on Northbourne** This Draft Framework should be put on hold until the Government fully announces the bus transport changes and implications for the community, eg, the proposal for no buses to travel on Northbourne Avenue once the light rail service commences (the community are not fully aware of this fact at all). Feeder

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	buses, it seems, will only be at Dickson, but nowhere else along this route? Until this has been established and with a "people first" approach mentioned throughout this Draft Framework, this is a complete irresponsible oversight, especially in catering for the needs of the elderly living in this area. **Comments on the Draft Framework** The format of this Draft Framework is problematic as a tool for consulting with the community. The size of paper and the amount of colour used, makes it prohibitive for the average home computer set up to print. The colour of pale grey print on white paper is extremely difficult to read on the screen and not good communication. It is also written using very "jargonistic" planning-speak instead of "plain English" for better community comprehension. Much of it is quite ambiguous in its intent. As a result, we suggest community input will be limited again. Even though many valid issues were highlighted during Stage 1, the Draft Framework does not appear to incorporate much of what was discussed and is therefore rather vague. However, we have reservations on the following: • Suggestions of the need for a "gateway" going back as far as the NSW border (or just where is unclear in the Draft Framework), would appear to be a contradiction with the suggestion of a proposal to limit motor vehicle traffic quite severely with only two lanes in either direction, with more cycling/walking along Northbourne Avenue. So why have a gateway if the desire is to have limited vehicles arriving via the "gate"? Is a "gateway" not seen as an entrance for visitors? And where is this "gateway" leading to – only to the City (an unattractive space at present). Or, is it meant to lead to the parliamentary triangle (Parliament House) which cannot be seen from Northbourne? A definition of a "gateway" requires clarification. • An urban village at the Macarthur Avenue junction would seem to be overkill given its very close proximity to a suggested urban village at Dickson – an extension of the Dickson Group Centre area. As it is only a 15-20 minute walk from Macarthur Avenue into the City, we would expect that to be the preferred/sensible (according to Government policy) mode of transport from this point, for most people, rather than waiting for a light rail service. • Provisions for walking as a means of transport must be completely separated from cycling – the needs of each are quite different. Provisions for walking as a means of getting from A to B is always at the end of the transport chain in Canberra. Walking for this purpose is little understood by those in government who do not use this form of transport themselves (which we regularly do). • Architecture of any future development along this route needs to be considerably improved, as there has been less and less variety in what has been produced in at least the last 15-20 years in Canberra. Whatever happened to the art deco style Canberra was identified with? There is little colour, texture or articulation in the built form, unlike the Brindabella Business Park office complex. It is uplifting there to see more creativity in design instead of "beige blocks"! Preference would be for an utmost maximum of eight storeys, with six storeys being more ideal, to be on a more human scale to avoid the sterile surrounds created with very tall unit developments. Higher buildings will severely inhibit sunlight and create wind tunnels in the colder months, making walking unattractive and also create a very sterile landscape canyon. With so much hard surfaces in buildings and on the ground, the human space around these areas will only become hotter and unbearable in the warmer months.

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	The setbacks for residential unit buildings are becoming smaller and smaller with little opportunity for any vegetation between building and road – eg Wayfarer, Belconnen is almost on the road! This issue needs attention for Northbourne Avenue future developments. The latest proposal between Northbourne and Dooring St in Dickson is a forerunner of what to expect – and it is not good. Blocks sizes should be smaller to encourage more variety of the built form, and sadly the damage has been done here with the sale of such a large block to one developer! The high and increasing body corporate fees in these huge complexes are unsustainable for many, making selection of this type of housing prohibitive. (Reports in The Canberra Times support this.) The ugly Axis unit development on the corner of Northbourne Avenue and Mouat Street, Lyneham was supposed to be a "gateway" development. It is not a welcome sight to see when arriving back in Canberra as it is completely out of proportion due to the enormity of identical buildings in the one complex. **Walking as a means of Transport** How many working on this project have actually walked the length of Northbourne Avenue in both directions more than once to understand the existing problems? When talking about pedestrian friendly environments, these are the current Northbourne issues: • Paths are way too narrow for "social" walking side by side. • Existing Hawthorn trees along Northbourne, apart from being visually unattractive, drop berries across the footpath making walking almost impossible and unpleasant under foot. • Eucalypt trees create worse problems for the pedestrians with leaf and stick litter and "ball bearing" like seeds (depending on the tree species) which cover the footpaths, and they offer little cooling shade. • Maintenance to remove tree litter off the footpaths is virtually unheard of on Northbourne or anywhere else in Canberra (this also goes for cycle paths). • The newly widened light coloured concrete footpath on Northbourne south of Haig Park is very unpleasant to walk along in the heat of summer, due to the extreme glare radiating from it and lack of any suitable shade trees. The grey colour used on the newly laid paths on Constitution Avenue would be more preferable to what was laid in Northbourne, especially if a decent shade tree is provided. Consideration needs to be given to the best material for Canberra's conditions, when constructing footpaths. This is especially in a proposed corridor of concrete and very little green vegetation to break the monotony. **Strategic Walking Network** Northbourne Avenue crossing for the pedestrian has been a nightmare for decades, as it is not possible to reach the other side without waiting in the median strip for a second cycle of the traffic lights. Preference at traffic lights in general has always favoured the motor vehicles – never the pedestrian. This barrier needs to be removed.

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	Why has four-way pedestrian crossings never been introduced in Canberra at one or more of the intersections in this corridor, as per Flinders/Swanston St corner, Melbourne? This type of crossing has been in place in nearby Wagga Wagga and Albury for 30/40 years and works very well. On Northbourne, pedestrian walk lights must be automatic (rather than press the button). Lights using a countdown number system would be a huge improvement for the pedestrian. If the Government's policy is to walk, it is time more priority is given to pedestrian movement rather than the motor vehicles. It's time the Government took a stance on this matter. Currently, pedestrian traffic is severely inconvenienced due to the amount of large building construction work across Canberra in general. Wherever construction is being undertaken, for some reason in Canberra it is necessary to close the footpaths and even a lane of the road for the entire duration of the construction – why is this? If it is Government policy to encourage walking, this matter needs serious attention, especially in light of what this Draft Framework is proposing in the years ahead. The closing of footpaths for this purpose appears to be unique to Canberra. This does not occur in other Australian cities – it doesn't even occur in big cities like London, as access is always made for the pedestrian. Currently in Mort Street, the pedestrian must cross the road five times from footpath closures between the City Bus Station & Haig Park to reach a destination. This is not a "people first" approach! **Laneways/Connectivity** As an example of a pedestrian laneway, the Draft Framework includes photos of Kendall Lane, Acton (pp13 & 45). Again, we challenge those working on this project to head to Palace Electric on foot, by starting from the northern side of London Circuit opposite the laneway between Capital Tower and QT Canberra Hotel, which then leads into Kendall Lane. At present this laneway is completely blocked off between these two buildings due to construction work on the building behind Capital Tower. Pedestrians are forced to walk down the loading dock ramp of QT and up the other side to then divert to Kendall Lane. Once in Kendall Lane there are the strategically placed large pots (to deter the motorist) across the midway point of the Lane. This requires the pedestrian to duck and weave to get past this point. When the pedestrian reaches Philip Law Street there is no safe and obvious part of the street to then cross to Palace Electric! When the Draft Framework talks about mid-block laneways, this type of egress needs more thoughtful planning with a pedestrian in mind. **Green Space** Green space is not clearly defined in the Draft as to what is meant by "green". There is ongoing reference to Canberra as the "Garden City". This was more fitting in years past with the gardens in place then, especially with the hedge rows along the residential front boundaries and the planting of deciduous street trees for shade, autumn colour & winter sun. This was the "garden" which Canberra was identified with, especially by visitors (this fact has been mentioned by NCA in recent press). There is more and more suggestion and push for the "bush capital" to only have eucalypt/native species of trees and shrubs? These natives create an overall grey/dull green landscape in a city environment of beige buildings. The native landscape does not fit the definition of "garden". Let's have more variety and colour of vegetation, instead of only eucalypts and unmaintained scrubby grass/weeds under them. Do people not flock to Floriade to see some colour? Any form of green grass or lawn will not grow under a eucalypt, and along with all the tree litter on the ground the only thing that grows prolifically are the weeds around the patches of bare earth! Hardly a "garden" according to any definition.

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	Canberra has very few green parks with well maintained lawn for sitting and playing on – proper attractive parks with playgrounds and seats. The only green lawns are on private golf courses, or on the maintained sporting fields – can't have a picnic at these places. What Canberra has less and less of is attractive deciduous trees with the variety of autumn colour – Canberra was once identified for its autumn colour. Why not have some more ongoing flowering colour such as crepe myrtles or even oleanders which flower for a very long time in Canberra and are very easy to maintain (no doubt this is considered a weed now in the ACT). In Sicily and other European countries, they are used as very attractive street trees. Remember "people first" approach, rather than text-book planning! We are not aware of any eucalypt tree which actually provides cooling shade in the summer. If the government wishes to encourage walking along Northbourne, or anywhere, some decent shade trees must be included for the summer – it should not be eucalypts alone. Clarification is required – is Canberra the "Garden City" or is it the "Bush Capital"? **Summary** Any plans to improve the public realm along Northbourne and beyond must come with an ongoing maintenance budget for broken paving, garden maintenance, street lighting, signage, broken glass, litter, graffiti, etc. Canberra is becoming more and more scruffy due to inadequate, or even no maintenance budgets. Like most of Canberra, unless there is an ongoing maintenance budget clearly defined and provided, the proposals in this Draft Framework will make a very unsightly "Gateway". It is embarrassing to think Canberra is Australia's capital!
63	My concerns as a homeowner are to be able to make an informed decision regarding whether to stay or sell up in a few years due to the future vision for the Federal Hwy/Northbourne gateway (based on rezoning outcomes). My details are below, but as stated on the phone, I live between [….] so would like to think that there would be early consultation and perhaps planning guidelines to cover possible scenarios, so I don't find myself the only single level house overshadowed by apartments either side. Also, rough timeframes would be useful, as I'm getting a new fence installed this week (that I can't stop), but obviously I don't want to go ahead with any other home improvements if there's a decent chance the property will be demolished in a few years time.
64	Thanks for the session at Downer tonight. My input gathered already, but a late extra thought: I would support some limited commercial opp at bottom of Swindon St near the new light rail station for a cafe and/or convenience store servicing the tram stop.
65	Thanks for the presentation and workshop held 9 April 2018 in Downer, I felt the session was very well coordinated. I would like to submit further comments to support the development of the framework relating to Downer. In summary: • I fully support the proposed height increases along the Northbourne corridor (18 and 12 meters). • I support the needs analysis being undertaken as part of this work and hope to see the outputs become part of the revised framework. • I strongly believe community support would increase if upgraded amenities and infrastructure were considered as part of the plan. Relatively low cost improvements such as; footpaths, street lighting, parking, access/egress and traffic flow considerations would garner support from a community that feels/is neglected in regards to infrastructure upgrades and upkeep.

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	My follow up questions and things to consider in the revised framework: • A document was presented with revised precinct areas and colour coded height indication. Can clear clarification be made on proposed heights on the areas shown as "Irregular End Blocks or Narrow Blocks" in orange? I would like to see corner blocks treated separately to narrow blocks as they have very different planning and development opportunities. • To support the height increase it is important for the community to understand potential rezoning requirements and any consolidation restrictions well in advance of any Territory Plan amendments.
66	I live in Downer and attended the Downer consultation meeting. My areas of concern are building heights and facilities for commuting cyclists. 1. **Facilities for commuting cyclists** In the "Movement" part of your Design Framework there is a Figure 11 that raises concerns. For roads with 60kmph speed limit I think it is safer for the commuting cyclist to be on the road at car level, not at pedestrian level. Pedestrians are actually less predictable and often want to go across the cyclist path. Commuting cyclists also need a way to overtake slower commuting cyclists. This would be very dangerous with the raised City Cycle Loop type of design with sharp drop-offs and constantly changing levels. The Figure 11 design style would also be a clear danger to cyclists and bus passengers if there are any bus stops along this type of road. Cyclists and waiting / alighting bus passengers would clearly be on a collision course. 2. **Height limits on Downer side of Northbourne / Federal Hwy.** It is a furphy to claim that 18m height limits for Yowani / Kamberra developments mean that Downer should have 18m developments too. New developments on the Yowani / Kamberra side have much more room and opportunity to be well designed with integrated green space. The Downer side is already chopped up into many small blocks so patchwork 18m developments will be appalling to look at and appalling to live near for the next 30 years. The Downer side of Northbourne / Federal Hwy should be limited to 12m developments for the sake of looks and livability. This will also reduce the chance of perverse height outcomes for people in section 44, especially those in blocks 20-30 and others living nearby.
67	It's great that the ACT and Commonwealth governments are collaborating on such a forward looking long term plan for the ACT. I attended the workshop at Downer on Monday (thanks for running it) and have the following comments, which were also made at the workshop (I had to leave early). Note that I have already made some comments prior to the workshop. • Overall, the plans look promising, with the following caveats: Ensure adequate sunlight is available to all residences in the higher density as well as lower density residences • Ensure there is enough visitor car parking for the higher density residences to ensure that visitors do not park on verges or on the narrow and well used streets • Consider controlling street parking for residents of the area • Consider more pathways between the blocks for pedestrians, cyclists etc

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	• Ensure adequate green space/recreation space is provided for the residents of the higher density residences
68	I live in Dickson just near the proposed MacArthur village. Overall I think it looks pretty good and I'm looking forward to it. But I'm concerned about noise impacts. At the moment Dickson is a pretty quiet suburb, even just a block or two from Northbourne Ave. This is a big part of it's livability and amenity as a suburb. I'm worried that the new village will be noisy, espeically at night. My concerns apply to the construction phase, as well as what it will be like in the long term when the village is a thriving community hub and how events like Summernats will affect the community after these changes. Has there been any priority given to measures to try to reduce sound carrying into the suburb? Will the village have noise restrictions on restaurants, bars and other venues at night? I also feel the proposed heights for the central towers are much taller than they really need to be. This will affect the outlook across the inner north toward Parliament House. The illustrations on your website don't accurately reflect the heights in the actual proposal, which I feel is very misleading. I'd much prefer to see greater areas of medium density throughout the suburb than a few tall buildings towering over our lovely new urban village.
69	I attended the consultation at Downer Community Centre on Monday 10 April and was sad to see how people were manipulated. We broke into groups and the guy facilitating conversations at our table was hostile and tried constantly to move us away from looking at our concerns and insisted on us writing down positives before we wrote down any concerns. On hearing for the first time about the development that will destroy our views and congest our streets, psychology 101 is that people will be concerned and if they are not heard are not going to be positive! He was visibly annoyed when concerns were being written down. I am a govt employee and was ashamed. I left having felt pushed and manipulated. How can the building of a fortress around Downer be a good idea? With an over supply of poorly build ugly apartment blocks how can more along northbourne ave make an attractive city gateway? How will the Act government stop developers creating another Gunghalin? I was disappointed that this project is not known by my neighbours and Canberra residents in general. Already Downer is in lowland. With a 6 story fortress built next to one story houses there is nothing gradual about that and shameful in light of Canberra being a garden city and this being her gateway. I totally oppose being overshadowed by tall buildings, by looking out my backyard at more poorly designed Canberra apartment blocks. The consultation felt like a token gesture and I would be grateful if you can let me know what you are doing about the emails and submissions that oppose this development? How can zoning atherton street be a good idea? There is no way it can accommodate the volume of cars that would come with that many people. Where is the gradual approach? One story houses next to 4 story building and 6 stories the view across the road. How is the Act government going to compensate for the fall in house prices for the people who's skyline and view is destroyed. With the light rail stops at Phillip ave and Swindon street a 20 min walk if you are in the middle! Most people would not walk to the light rail stop if that far away. No bus stops either, which means way too many cars and congestion. I recommend height does not exceed two stories if this has to go ahead in precinct 1 and 2. How will the ACT govt control developers and prevent an ugly Gunghalin like corridor? How will my recommendations be included?
70	It is interesting to note the draft City and Gateway framework is not considering the public's concern of increased traffic congestion. How will decreasing the lanes of Northbourne avenue help to alleviate the traffic congestion that will be seen when the additional 17000 people want to drive to sporting commitments, drop off for schooling or just go to work in Woden, Canberra Airport or Tuggeranong? The light rail and Action buses will not suit the family trying to get to school/work.

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	How many people utilise the intersection(Macarthur/Northbourne), trying to avoid the city, coming from Belconnen and Gungahlin heading to Russell and the Canberra Airport, Fairbairn or Duntroon. There are thousands of people working at the airport, when is any of this future planning going to accommodate them.
71	I was present at the meeting on Monday the 9th, but unfortunately the group I was in was not productive in getting their feedback and counter proposals on the table. It was a disappointing experience from my perspective, but only due to another resident disrupting any constructive discussion. I was supportive of the grater conversation and feedback that followed the group work. My Concerns: Heights/solar access After reading the plan, my initial concerns were the heights of buildings on the Downer side of Northborne Avenue and how they would affect not only my outlook, but also access to sun. At present, my property at [….] sits around 2.5 meters lower than the natural level at Northborne Avenue, further exacerbating any change to height and solar access. I was present at the meeting on Monday the 9th of April, where changes to the heights in the northern section of Northborne Avenue were identified as reduced to 3 to 4 stories in height at a maximum of 12 meters (15 meters from my perspective). I have done some sun mapping and identified that at the winter solstice, my property would be affected with a 50% - 25% reduction in solar access across the day. (My neighbours on the right hand side would be even more greatly affected). The Framework permits a reduction of 20% across the day… I did ask our facilitator if the 20% reduction was over a year or over the course of the day, but they were unable to answer how that rule is applied. Can you please provide me with a response of how the 20% rule is applied? source of Sun Map – SunCalc.net. **Proposed heights capped to 10 mtrs (3 story only)** Due to the aspect and topography of my property any changes across the road, in the heights closer to Northborne, even the 6-7 story buildings across Northborne will have a direct affect on solar access to my property. At present, the house is shaded by the radiata pines across the racecourse side of northborne avenue in the winter, which is dappled light. Putting a solid form in place will have an even grater impact so this is very concerning indeed. My main living area faces this north westerly orientation. **Noise/Busyness of Street** As Briggs Street is the first entry point into the suburb, it is already quite busy with through traffic looking to get to Banfield street, Atherton street and beyond. The Street is very narrow, there are no footpaths and making the turn on and off Phillip Avenue can be difficult in ideal conditions. The increase in properties along the Northborne corridor would require a significant reworking and rethink of Briggs and Banfield Street. Both streets are in no condition to carry additional traffic, have poor natural access and cannot accommodate on street parking (which is the norm when it comes to multi unit or higher density development) – (see parking issues on Blackett Street for reference) • Street widening would need to occur • Footpaths would need to be installed • Speed limits would need to be reduced to 40KM/PH • Lanes and access between new developments defined Although you cannot cater for extra noise, it's something that I will have to deal with at a cost to me. Other residents in this path will also have to deal with the implications increased traffic and activity will bring.

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	Insulation, double glazing and landscaping can all be applied to reduce noise.
	• This will be an additional cost to the homeowner, will compensation or grants for existing residents be flagged to support those who will need to improve noise reduction strategies? Please add this as a consideration to your framework.
	• Consideration also needs to be given to extra cost for target hardening (reduction of crime) that will be required as a larger population moves into the region.
	
	Quality of Location
	Although we will soon have access to public transport that can take us either to Gunghalin or the City, the overall outlook and suburban quality of my location will be greatly reduced. Instead of looking out of the window to houses, trees and a sunny aspect, my new reality will be facing multi story/multi unit/higher density developments.
	This is something that will not only impact quality of existence, but will also greatly impact the value that others see in my property location as well as the solar access issues noted above.
	Facing the proposed development will much harder than backing on to it as you can't even pretend its not there. I think this sentiment would be mirrored by all residents on Briggs and Banfield streets directly facing the developments and their aspect facing the north west. This was also raised as a point the in the community meeting with the comment that 'those across the street will miss out, but bear the consequence'
	• Proposal: that all properties on Briggs and Banfield be rezoned along with the blocks directly backing on the Northborne avenue.
	  ○ This will allow existing residents to see maintenance of property values
	  ○ Have the opportunity to sell for development
	  ○ Allow the number of residents proposed in the original plan with heights up to 18 meters to occupy the corridor space due to the opportunity to redevelop these blocks
	  ○ Encourage a village type feel and median density townhouse which could cater for older residents and those with special needs.
	A sentiment that was shared by a lot of groups in the Monday meeting was that they would like to see medium density townhouses in the area. Something that existing residents might like to move into (there were a lot of residents in the older demographic who made this point) and that could cater as first homes for new residents, provide options for those with special considerations and help to maintain the suburban character of the Downer.
	If the blocks across the road from the proposed zoning were also rezoned, the 'step down' to regular heights would still occur, but there would be a direct delineation between the city renewal zone and the remainder of the suburb. This approach could be mirrored all the way down to the end of Blackett street if the planners are amenable to the suggestion.
	Enforcement of the Planning Rules and framework by NCA and EPSDD:
	Having watched the Dickson and Downer (school site) developments closely, there have been multiple failings of self-regulation of the planning process. This is expected when developers and corporations have conflicting interests and goals when it comes to their projects. The planning rules basically state

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	that if an issue with the plan is identified by EPSDD they 'trust' that the designers will rectify any issues… the general public knows this is not the case (due to the afore mentioned dissonance) and doesn't not have the resources or expertise to fight developers or corporations due to the costs involved. This was very evident in the Dickson redevelopment with Woolworths (who obviously have their own agenda) essentially fronting the ACAT bill (the judgement cost 25k alone) • I would want to see strict enforcement of the framework and planning rules in any developments by EPSDD and NCA. The Framework document spouts that developments in this zone will define Canberra and the gateway to the city. As such, we have one opportunity to get things right for the immediate future. • I would want to see high quality developments with interesting design/architecture that improve aesthetic and mitigate impacts to existing residents. **Limit Consolidation of Blocks** I would like to see the consolidation of blocks limited to three parcels of land. I would also like to see through access to Northborne Avenue at the edge of the southern most boundary of each consolidation or identified in the framework. The draft framework currently allows for building up to 55 meters long. I think this should be reduced to improve natural access and ease of passage to the rail corridor. **No Resumption of Leases** Although we were given a verbal guarantee by Fleur in the meeting, I would like to see this written to give residents confirmation of their independence and liberty. **Community Access/Amenities** As a young member of the Downer community, I have concerns about the area as I plan the next phases of my life. I have great concerns that the existing amenities of the region will not support the growth in residents. This is especially evident in the number of school places available and the proximity to schools in the area. The Downer school was razed and there are proposals for the Watson High School (currently operating at a business park) to be redeveloped into accommodation and a tertiary/vocational college. I believe some of these considerations have not been thought through and will need careful planning and coordination. There are a number of planning proposals/activities in the area that are concurrent, but no coordinated. I believe that a 'bigger picture approach' is required to ensure these hurdles are over come and I look forward to your needs assessments for current and future residents of the region. Some basic access to shops/doctors/schools will be necessary for the increase in population around the 'node' **What is going on Across the Road???** Through all of this discussion and planning, we don't really have a good sense on what the rules will be across the other side of Northborne… what type of development? Will there be commercial? What is proposed? Who will manage the development and direction?

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	Residents are being asked to consider the plan and framework, but this is in isolation to what is going on just 150 meters away. How can residents make appropriate suggestions or provided feedback on the plan when there is a very large parcel of land destined for its own transformation. • What information do the planners have on the development across Northborne • Any information should be posted to the yoursay page for consideration of impacts and outcomes. Thank you again for taking the time to read my submission and consider some of its points. Although I am just a resident with an opinion, I hope I bring a real world context to your planning process, some constructive input and provide some additional considerations that may inform your thinking. You may note that there are a number of questions/points within my submission to which I would appreciate an answer to or feedback on. I have copied them below: • Can you please provide me with a response of how the 20% rule is applied? • will compensation or grants for existing residents be flagged to support those who will need improve noise reduction/target hardening strategies? • Proposal: that all properties on briggs and banfield be rezoned along with the blocks directly backing on the Northborne avenue. • No Resumption of Leases - in writing and cosponsored by ACT Government and National Capital Authority. • consolidation of blocks limited to three parcels of land • What is going on Across the Road???
72	I am writing with regard to the proposed "The City to the Lake" development. If carried out, this development would destroy the existing West Basin Acton Park. As this Park now provides a calm and serene natural environment for individuals and families, its destruction would be very detrimental for Canberra. The waterfront recreation area included with the proposed development will in no way compensate for the loss of Acton Park. Much better than the proposed development would be an enlargement of the existing Acton Park with a minimum of paved areas and no more cafes or commercial operations than the small cafe and cycle and boat rental businesses that adjoined Acton Park. Therefore, I am strongly opposed to the West Basin proposed development that is shown on plans in the City and Gateway Draft Urban Design Framework. I request the City and Gateway Team not to allow "The City to the Lake" development project to proceed.
73	It is clear that a lot of thought and effort has gone into reviewing this corridor and much of what is proposed looks good. I very much like the idea of better cycle and pedestrian ways and a beautiful entrance to our city and urban villages and it is great to see investment and work into improving our city. However, I do have some concerns I'd like to raise which I hope may be helpful. My understanding of the tram was that it would ease traffic congestion along the Northbourne Avenue corridor. My key concern is that I do not see how reducing 3 lanes to two and massively increasing the population density of this corridor is going to achieve this - it would logically achieve the opposite. Please give consideration to feedback on this issue and review and adjust plans to prevent this issue. Continued peak hour gridlock would not be a good thing. Safe pedestrian ways for people to reach tram stops should work as easily for 3 lanes as for 2. I'm also very concerned at the loss of Exhibition Park – I would have thought one of the advantages of the tram would be to transport people to events at the park which hosts the Canberra Show among other regular Canberra events. Why on earth is it being replaced by more apartments which is my impression? Why are they being taken out instead of upgraded? What is to happen to these facilities that Canberrans use? I have seen nothing in the

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	media or from the Government to advise where these are to be moved to etc and if any thought has been put into transportation/parking etc for these facilities. It would be good for the public to know what is happening in regards to these facilities. If they are to be moved/replaced why not use the opportunity of this land to invest in a top quality stadium & complex of Olympic/commonwealth games standard for top sport and entertainment events here in Canberra that are currently hosted in other cities as we do not have the facilities. This could be done with a mixed use complex for Canberra to manage exhibitions, races, tennis competitions, world class sporting games etc. It would make the corridor and tram route have more interest and purpose other than simply ferrying people from Gungahlin to and from the city ie it would have more of a use for all Canberrans and it would be seen to be giving back something to the people of Canberra rather than the taking away a useful shared resource for simply more apartment developer profits. Perhaps something similar in concept to how Melbourne manages their sport and art facilities near the city which gives both their city, sport and art facilities, trams and Yarra river a wonderful and much enjoyed connection . The tram can then be used to link people from these events to the city of benefit to the businesses there and in linking becomes a tourist drawcard also as well as being an interconnected arrangement everyone across the city and our visitors can enjoy. Please be thoughtful re building heights and shadowing issues and to be in keeping with an appropriate look for Canberra that doesn't overshadow what else we have. I know this has been in the media a lot but we don't really want some weird version of Sheikh Zayed Road, Dubai if it doesn't really fit in with Canberra. I understand higher heights mean more with less land footprint but tall buildings have issues also that can affect the environment around them. The wind tunnel effect around the ugly 70's MLC tower in Woden is a good example (growing up in Lyons I know this wind really well!) Please also ensure that there is an ongoing budget for maintenance. This is a current and important issue across Canberra at the moment – lots of repeated comments from many Canberrans on this one. Parks Way, for example, has ruined landscaping and looks very scrappy, despite work done in sections, due to weeds everywhere and faded signs. The tussocky grass which is nice and easy to put on a computer model looks horrible once the weeds grow in between eg the Russell/Kings Avenue overpass over Parks Way and relatively new Malcolm Fraser Bridge at Monaro Highway also now has weeds everywhere. Parks Way is also a major entrance corridor from the airport into the City and could definitely do with some TLC. The resurfacing of the roads, originally proudly made with cycle paths, recover the roads around Canberra very poorly and leave scrappy tarring edging and loose gravel within the bike lanes making them look uncared for and unsafe eg Monaro highway and again Parks Way among others. To be honest there is not much point tidying up the Northbourne corridor if there is no thought being currently put in into how to easily and effectively to maintain the look of the landscaping for years to come. I would love to see more thought and funding Canberra wide for the care of our landscaping and presentation of our city for its citizens and visitors. All the best with the project and creating a corridor that will be a pleasure to use and look at. Many people love this city including myself and hope that all future work is done thoughtfully, with care and with long term vision.
74	Lake Burley Griffin Guardians are concerned not so much with the height of buildings but with the massive destruction of green and natural space over the entire area and the lack of adequate open space for residents. We also note that Northbourne Avenue is within the Designated Area of Canberra and therefore the development will require a study under the National Capital Plan (NCP) of the environmental impacts on its heritage and National Significance. • The City and Gateway Plan allows for increased building heights but has no parkland space for recreation. It is depending upon the existing Sullivans Creek parkland spaces — hardly enough to service the needs of such increased population density.

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	• As a consequence of the diminishing landscape space and rapidly increasing hard surfaces, the newly developed areas would be unable to cope with runoff from a significant rainfall event as has recently been demonstrated. • The development discusses the need for solar access to apartments but apparently does not promote vertical photovoltaic power systems which are being undertaken in high-rise apartment blocks in other parts of the world. • The dramatic increase in population density will have a marked impact on the parklands of Lake Burley Griffin particularly in the Central northern areas and significantly in Commonwealth Park. Commonwealth Park cannot cope with major events without adequate parking nearby. West Basin's Acton Park area has been critical for providing parking space for these events and will be unable to continue in this role if current plans for the West Basin residential estate are realised. While it is accepted that some of the current parking area in West Basin may be excessive, it will be many years before Canberra has the public transport infrastructure to bring its citizenry to its centre for major events. **The selling and destruction of the Lake Burley Griffin frontage** • The West Basin building estate development has been noted in the City Gateway development proposal and appears in some but not all of the diagrams in the report. We note that West Basin as parkland is needed now more than ever. West Basin's green space loss will be a significant loss to present and future residents — their well-being and the environmental health of the City. It will also be a critical loss for visitors to the City and the image of the National Capital. • The City to the Lake proposal means the parkland will be covered with blocks of apartments — mostly 6 storeys high. The 2.1 ha of the lake infill will provide space for a row of apartments and an access road. The public will have a waterfront promenade over the retaining wall and a strip for cafes. • The proposed hard-edged waterfront will cover the existing beaches that people use. Importantly the natural lake edge in this area is also wildlife habitat. We know birds nest there and that platypus have been seen nearby at Acton Peninsula. All the trees in West Basin will go along with their bird life. • Rather than negate urban heat the West Basin development will increase damaging city heat the product of high density residential development, increase night light pollution, drastically reduce storm water retention and increase lake wave action. • Traffic congestion on Commonwealth Avenue will be greatly increased with the new 2-way traffic intersection proposed at Albert Street, as access across Parkes Way appears to have been dropped from the plans, negating the City to the Lake concept. • Winter shadows from the apartments will extend over the proposed public areas around the solstice period. • There have been no heritage or other impact studies undertaken to understand the effects of the building estate, as the National Capital Authority’s own study and the NCP require, or for the increased traffic **The Reduction of the public's use and parking** • West Basin space can be used for games and concerts, art events and family picnics as well as for providing space for kiosks and recreation concessions and public parking for events such as Floriade. Once the lake infill and parkland is sold for private development it will be gone from the public estate and public use forever. This is contrary to the Griffin's 1911 plan and to the subsequent 1913 and 1918 plan as well as to our constructed Lake and parklands highly valued as a heritage feature.

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	• Acton Park, West Basin, is neglected and currently has too much area given to car parking, some of which is treeless redundant futsal courts. But this could be remedied and the area made into a world-class park that Canberrans and national visitors could be proud of and enjoy, without selling it for a private vista-blocking apartment estate. • There is no parking area proposed for public use, making it very difficult for Canberrans and visitors to use the limited public areas in West Basin and those adjacent such as Commonwealth Park. **Background** Lake Burley Griffin is a product of the composition design of Walter Burley Griffin and the technical work and professional skills of the Menzies' National Capital Development Commission which created the lake with modifications to ensure more natural shorelines and water flow. The continuous green space perimeter of trees and grasslands is an integral component of the lake system. The result of the integration of the two designs and the achievement of the engineering works makes the lake system a modern masterwork that now holds high aesthetic and social qualities valued by the community and visitors. Lake Burley Griffin needs its parklands to retain its beauty and its recreation use but also to retain a healthy natural environment. Heritage listing is urged by the Guardians and international heritage experts to protect Lake Burley Griffin's significant qualities. Heritage is vitally important for a city's tourism economy. Domestic and international visitors do not come to Canberra to gaze at apartment blocks. They come here to see Parliament, the Lake and the events held around it as well as our National Museums and Galleries. West Basin is a strategically important landscape space. When visitors and others driving south around City Hill, the vistas across the lake and to the mountains beyond, immediately opens up to them. The open space balances the City's lake-parklands-urban form that West Basin as a private residential estate will destroy. In conclusion, for all the reasons stated above Lake Burley Griffin Guardians has strong concerns about the landscape and parklands offered to residents of the apartments in the City and Gateway proposal and is strongly opposed to the West Basin proposed development that is shown on plans in the City and Gateway Draft Urban Design Framework. The Guardians also note that a petition of 750 petitioners opposed to the City to the Lake Development and concerned for the heritage Lake on 22 November December 2017. Submission update (February 2019): Lake Burley Griffin Guardians dismisses *City and Gateway Urban Design Framework Final Report* as having little credibility as it includes a page on West Basin that was not present in previous iterations of the study reports including the reports on the community consultation suburban meetings. The late inclusion of the page on West Basin (page 43) implies consultation and agreement with the comments expressed and that did not happen.
75	I am writing to advise that unfortunately the Government's consultation process for the City and Gateway Draft Urban Design Framework is seriously flawed and deficient and, in view of this, the closing date for submissions (currently 27 April) should be extended by a month and the additional material promised should be made available publicly next week. My reasons for this are set out below.

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	I attended a meeting in Downer of about 80- 100 people on Monday night last week (9 April) which was ostensibly about the broad Gateway proposal/framework, but turned out to be about getting views on an indication of high rise apartments on the north-west edge of Downer. (The main Framework document makes no specific mention of these – see references to Downer on pp 8, 17 and 22.) A new hand-coloured 'map' of the area, showing the housing blocks affected and the long rows where apartments would be situated, and one copy of the main 70-plus page *City and Gateway Draft Urban Design Framework* were available on each table for about ten people to share at the meeting. There was no copy of either document available for general distribution. Instead, we were assured of three things: **1. The main Framework document was available for perusal at all public libraries** *It is not, and it never has been, at the Dickson library* I and a friend had set aside several hours this afternoon and evening to work through this document at the Dickson library, but the librarians there had never seen it • Why hasn't anyone in the planning directorate ever checked that copies were provided to libraries (multiple copies per library at least)?* By 5 pm today (Friday), thanks to the Dickson librarians and their central office staff the library had tracked down an officer of the Environment and Planning Directorate who spoke to me by phone at the library and undertook to arrange for a Framework document to be posted to me on Monday (the Framework team were not available to assist). However, with a public holiday on Wednesday and the Australia Post's on/off delivery days, I am unlikely to receive my copy until Thursday 26 April, the day before submissions close. And tonight (Friday 20 April) was the night for working on my draft submission ie having done my 'homework' at the library this afternoon. Instead I am writing this letter. **2. The new hand-coloured maps of Downer showing the development area/blocks would be put up on the website after the meeting, as requested, to assist accuracy of submission making** *They have not been*. • How is anyone, especially a Downer resident who was not at the meeting, ever meant to find out what is actually in mind for the north-western side of Downer on the Northbourne Avenue- Federal Highway? **3. The notes from the meeting would be distributed to those who attended** *As at COB 20 April they have not been*. In view of today's discoveries, I strongly suggest:

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	a) that the submission deadline be extended by at least one month. This will allow dissemination of the documentation mentioned above, in hardcopy and online, to individuals, community associations, and community councils. b) all libraries be sent multiple copies *City and Gateway Draft Urban Design Framework* early next week and an advertisement placed in the *Canberra Times, City News, Canberra Weekly* and the *Chronicle* next week to advise of this and the extension of the deadline, plus advice on this be emailed to all ACT community associations and councils. c) all those at the Downer meeting and all inner north community associations and councils be: i. emailed to say that the full document will be available at the Dickson library from a specified date in April and that the submission deadline has been extended ii. provided with the notes from the 9 April meeting next week. d) the hand-coloured map and an outline of what it shows and the reasons for this be put on the website, sent to all community associations and councils and also to all those present at the Downer meeting as soon as possible, as promised. Also all those who have put in submissions already should be sent this information in case they wish to change or add to their input. The consultation process so far has not been encouraging or sufficiently supportive and I hope that it can be rectified speedily and openly over the next few days. *Though it did seem odd when looking at the website earlier this week that no mention was made of the documentation being available in public libraries – I assumed this was an oversight… My time, my friend's time and that of two librarians has been totally wasted by the lack of provision of the basic and key documents for the consultation process in an easily useable format. Also I am not able to set aside blocks of time this weekend to start ploughing back and forth through the 70+page document on a screen. I also know a couple of locals who were going to access the main Framework document this weekend but I will advise them that it is not available in hard copy.
76	I am not supportive of creation of urban villages along the City and Gateway Corridor. The building of high density, high rise buildings of up to 48m to provide another 37,000 dwellings in only 256 hectares is not supported. High density, high rise living has been proven around the world to lead to health problems and reduced well-being . In addition the provision of services eg schooling, medical, policing to the additional residents of the 37,000 dwellings in such a small area is highly problematic and unlikely to be effective. Changing the capital's entrance, the reputation and reality of Canberra as a bush capital with green spaces and a focus on the natural environment will be destroyed. It will change the character and nature of Canberra irreversibly.
77	I am not supportive of the plan to canyonise Northbourne Avenue with high-rise buildings. In my opinion, Australia is building too many poor-quality high-rise apartment towers that are alienating to live in and have low environmental performance. It has been shown that high-rises diminish people's

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	participation in public spaces, and towers create silos – physical, social and psychological. High-rise apartment towers are less environmentally sustainable than low rise housing, because they need constant air conditioning and heating. They also use more energy due to central plants, pools and spas. Tall buildings create large shadows, wind tunnels and poor street environment, which in turn makes activities such as jogging or cycling much less enjoyable, creating less amenity, life and activity. In my opinion we do not need these buildings in Canberra. They do not fit with the original plan to create a city like no other – indeed they will make Canberra just like any other city, ruining the liveability and appearance of the city as the Bush Capital. The addition of 37,000 dwelling spaces along Northbourne Avenue will put immense pressure on the surrounding infrastructure, especially the parallel roads. Already Forbes Street has been effectively reduced to one lane due to increased parking along both sides of the road. There are no pedestrian crossings, and the street lighting is very poor, making accidents due to the inevitable increase in road traffic if the high-rises are built much more likely.
78	I write to protest strongly many aspects embodied in the current City and Gateway Draft Urban Design Framework (the Framework). **Building heights** The building scale proposed is NOT appropriate to the streets. The proposed building heights of 18 metres along Northbourne Avenue and 12 metres on Bradfield, Atherton and Blacket Streets is too high. There should only be a maximum of three storey buildings along Northbourne Avenue, and a maximum of two storey buildings along Bradfield, Atherton and Blacket Streets. **Narrow streets** Downer has very narrow streets. They are not the wide boulevards you find in Ainslie or Braddon. Building heights as proposed, on existing narrow streets, with inadequate or none (in places) footpath infrastructure, will 'crowd' the street scape and destroy its current leafy aesthetics and amenity. Setbacks will not address this. **Overshadowing** The existing narrow streets, together with the proposed building heights, will result in the overshadowing of surrounding buildings being exacerbated and beyond what is reasonable for residents to be expected to put up with. Setbacks will not address this. **Infill first** There should be a concerted strategy to infill developments south of Antill Street along Northbourne Avenue, before any rezoning takes place north of Antill Street. This is because developers will inevitably move to the cheaper land in Downer before infilling the more expensive land south of Antill Street. The introduction of any Framework should be delayed at least until all areas south of AntillStreet are infilled. **Downer is a community** Downer is a community. We purchased here because we wanted to live in a leafy suburb and a community environment, not the overcrowding you are proposing on page 44 of the Framework – "To meet the ACT Government's target of 30% active travel for the whole of the ACT, the increase in the share of

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	active travel to, from and within the city and gateway will need to increase disproportionately." A disproportionate increase is unfair on Downer residents, many of whom chose to live here because of the community it offered, not because of any enviro-urban-density socio-political agenda. **Lack of infrastructure** Any announcement of a 'potential study' to explore the 'possibility' of re-introducing schools, cafes, shops and other urban infrastructure into the Downer area, as was contemplated by one of your facilitators at the recent Downer community consultation session, is simply not credible. Realistically it would be years away from happening and no more than a platitude. And in the meantime, the introduction of the Framework would have facilitated the increase in the construction, the people, the noise, the inconvenience and the crowding along the streets of Downer. **Symmetry** The Framework claims it seeks 'symmetry' on pages 28 & 29 of the document. To be consistent with this principle, the ACT Government should not allow buildings any higher than three storeys between Antill and Swinden Streets, opposite the Lyneham Playing Fields. To allow a six storey building opposite a wide expanse of greenery would be particularly offensive, and the sense of asymmetry would be exacerbated at this point along the main avenues. For the avoidance of doubt, the 'symmetry' of building heights that the ACT Government has achieved on Flemington Road in Gungahlin is truly hideous. **Active Travel Streets and increased density** Blacket Street in Downer is already used as a shortcut for motorists looking to avoid the morning congestion on Antill Street. The idea that on a very narrow street, with two waytraffic, with poor footpath infrastructure and limited space to make any wider and still allow for two way traffic, and to accommodate the increased parking and congestion that increased density will bring, will somehow facilitate an 'active travel street' (as contemplated on page 46 of the Framework), is absurd. Did town planners walk along Blacket, Atherton and Bradfield Streets before they put this proposal together? Downer doesn't even have footpaths on many of its streets. And those footpaths it does have are narrow and in poor repair. **The NCA** The NCA should stick to monuments and the Parliamentary triangle. They have little or no regard for the communities that live along the proposed corridor. That is the role and function of the ACT Government, and it seems odd to cede responsibility to the NCA. Northbourne Avenue, as proposed in the Framework, will operate as a divide, not a connector. It's already extremely difficult in the mornings to get kids to Lyneham Primary School from Downer. The Framework as proposed will exacerbate the divide, not relieve it; it will divide communities, not unite them. **Road lanes decreasing from three to two** Unless a person lives AND works somewhere along the light rail line, most of us will still be required to take a car to work each day. So the idea that the ACT Government is proposing to reduce the car lanes on Northbourne Avenue from three to two is breathtaking in its ideological stupidity.
79	Completely support the vision. High-densiry development means progress, and is more environmentally and economically sustainable than the alternatives. Plans look good - just ensure vegetation is incorporated into all developments

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80	I am just getting information about the above Framework and am feeling a little concerned. I have looked at the PDF document on the Your Say site and am not sure what is planned for the Downer area I live in. I live on [……..]. I would appreciate some clarity on development plans in this area. Is the intention to build apartments/townhouses on the green area at the back of our house? Where is the 'informal park boulevard' situated? In the middle with the light rail or behind us where there is already a green area which people use to walk their dogs etc? Where are all the apartments/townhouses going to be situated? The information provided so far does not make this clear. Any information/clarity you can provide on this matter would be greatly appreciated.
81	**1. INTRODUCTION** The following comments are made by the Australian Institute of Architects, ACT Chapter, (the Institute) on behalf of its 320 members. The Institute appreciates the opportunity to provide the following comments on the draft urban design framework. **GREEN INFRASTRUCTURE** The Institute supports the initiative to provide opportunities for more intense development along key public transport routes within the existing urban area of Canberra. This will provide for additional housing, communal and commercial spaces without the need to further expand the urban footprint of the city. We applaud the strong focus on the quality of the streetscape to be provided and the contribution to the green infrastructure of the city. We fully support the focus on providing an environment where moving through the city is made a pleasant experience, promoting active travel and use of public transport and social interaction. It is critical that in increasing the density of the existing urban area that close attention is paid to the provision of a high level of amenity. The streetscape controls and the attention to activating frontages is a major contribution to this. However, there also needs to be a highly developed strategy for generating outdoor recreational and social areas that are not tied to commercial activities and providing space for the day to day informal enjoyment of the green infrastructure of the city. While there is some reference to creation of destination parks within existing open areas that are currently reserves for sports fields, waterways, school grounds, this is one of the less well developed aspects of the gateway proposal. There is no allocation of additional recreational space or parkland. The existing open spaces can be enhanced by substantial investment in both upgrading of the landscape to provide for recreational uses such as barbecues and picnics, informal and natural play areas and recreation, in addition to improving stormwater management and improving living green infrastructure. However, there also needs to be clear goals for additional usable open green and social space within the city beyond reliance on the streets. Most of the communal spaces already marked are currently allocated for uses that limit their modification for more diverse recreational functions by their existing uses. The demand for the existing uses is likely to rise rather than diminish with an additional 37,000 households. It is disappointing to see that there is no provision for additional public space within the Dickson hub. The small pocket park indicated appears to be confined to the easement area of the stormwater drain and does not take the opportunity to recover the surface carpark area to provide a larger park. There is also no other indication of a public square within the centre to provide for informal free social and recreational use for the additional households or workers in the hub.

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	It is recommended that the urban village frameworks be reviewed to include clearly defined future public open green space that will enhance the amenity of the areas and can be a focus for social / community facilities and activities. Similarly more detailed consideration to how informal recreation and activities such as barbecues will be provided for throughout or in close proximity to the development. When defining space that will be needed, there is an opportunity in the suburbs behind the avenue to introduce the missing middle dual occupancy townhouse and terrace forms. This will enhance their density consistent with their lower-scale, landscaped character. This will also create demand for recreational open space in the future. If it is intended that this level of amenity is to be provided within larger developments along the avenue, this should be explicitly set out as a strategic requirement. Another key role of this green infrastructure is the collection, detention capture and gradual release or reuse of stormwater from normal and extreme events. The flooding experienced in February 2018 demonstrated the need for this to be considered in the allocation and design of greenspace and detention ponds. This provides an opportunity for enhancement of the green infrastructure as seen in Dickson and Lyneham through wetlands that provide a social and recreational focus as well as the buffer for storm events. **SUSTAINABILITY** While there are generic statements about the need for buildings to be sustainable it is disappointing that given the planned increased density, enhanced performance through defined targets are not included. Targets such as minimum 5 star Green Star would drive increased focus on energy and water efficiency. Targets on minimisation of any increase in Urban Heat Island effects could be introduced through design of the landscape and building envelope. Increased density of development needs to generate improved energy and water use outcomes to provide ongoing sustainability benefits. **SOCIAL INFRASTRUCTURE** To generate development opportunities, a substantial amount of public housing has been removed from the central area of the city through the sale of large public housing sites. Affordable and public housing needs to be provided within the central areas as well as in dispersed locations throughout the city. The Gateway development has the advantage of close access to public and active transport links to the city centre and urban villages. It is logical to provide social resources and government service points for the whole community and it is an ideal location for inclusion of affordable housing and public housing. Targets and strategies for the provision of affordable housing and community facilities should be set out within the City and Gateway framework as this is a key part of the social equity character and sustainability of the framework. Targets for affordable housing in Central Canberra should reflect the percentage of people needed to provide a workforce in the area whose wages will put them into the affordable housing need category. The location is one that can enhance the affordability through access to resources and public transport provided there is a level of embedded amenity and recreational space that does not require pay to play. A built form designed to minimise ongoing costs related to energy and water, while maintaining comfortable healthy living conditions will benefit all new residents, but is particularly valuable to those in the lower two quintiles of income who need to maximise disposable income from limited resources. The proposal to increase the height permissible could provide a mechanism through inclusive zoning requirements or commitment of a percentage of funding derived from capturing increased land value through the Lease Variation Charges to some defined sites for development by community housing providers for contributions to both affordable housing and community facilities.

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	As an example of the latter, key commitments to the community about community facilities such as the retention of the Dickson Pool should be noted. Demand on this facility will increase as it provides a major social resource and destination for the community and this should be acknowledged in the planning to ensure associated requirements and opportunities are captured and the community can have a sense of emerging social richness within the area. Part of this discussion should also be about the provision, location and role of future school facilities and their function as community resources in this corridor to meet the needs of the additional 37000 households. **CONCLUSION** The Institute supports the proposed increase in density defined within the City and Gateway Urban Design Framework provided there is a high level of amenity embedded. We take the opportunity to make the following recommendations. • Increasing the space allocated to parks throughout the area and public green open space within the urban villages. • Developing and articulating the strategy for use and enhancement of the existing green open spaces to provide clear guidance to the community on how the increased demand for parkland and informal recreational space and facilities will be managed, while maintaining the required space for sports and school grounds. • Implementing a strategy for the management of stormwater to avoid the flooding experienced in extreme events that is tied to design of green spaces to provide enhanced recreational and biodiversity support opportunities. • Setting targets and strategies within the urban design framework to deliver affordable housing into the City and Gateway and adjoining areas to meet the demand assessed against the estimated workforce required in Central Canberra whose households are likely to be in the lower two quintiles. • Outlining proposals for the provision and role of key community facilities such as new schools, Dickson Pool and community centres in the Gateway development, to define the commitment to the social sustainability of the area. • Considering opportunities to increase density in the adjoining RZ1 and RZ2 areas through the introduction of low scale terrace townhouse, dual occupancy and other individually titled housing stock when assessing demands on community and green infrastructure.
82	On behalf of […….], we welcome both the NCA and ACT Governments initiative to provide a more certain framework for the City and Gateway in Canberra. As way of background, in brief […….]. Having attended a recent informative forum hosted by Aecom recently with representations from NCA and ACT Government, we wish to advocate and offer the following comments: **With respect to Macarthur Intersection** • The vision of creating the Macarthur Avenue intersection as a landmark identifier and Urban Village promoting pedestrian, bicycle activity and lifestyle is commended. The notion that this can be achieved with a building with only an RL of 617, effectively 15 storeys of which 3 would invariably be above ground parking due to inground rock limitations, would be difficult to achieve as it is not only limiting immediate density where most desired but limiting best design practice. The reality is we will get **one chance for the next 50 years** to formalise this location and to limit the height to a historical condition I have never heard anyone support (that a building can't rise above the base of the flag at Parliament House!) shows no logic and is short-sighted. Aren't we creating a plan for the future? We understand it requires both parliaments to alter this, so let's do it. I

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	cannot see which side of Government could possibly be against if NCA and ACT Government independently made a recommendation. Let's get our local senators supporting and speaking up for Canberra. We are not advocating skyscrapers, simply a true world class medium height building. This could be anywhere between 24 to 40 storeys. True identifiers to highlight Burley Griffins vision and accentuate the corridor. Additional height will enable these 4 corners to create more slender taller buildings opening up the ground plane for pedestrians, daylight, less shading, bike parking, a children's play area, retail shops with north facing forecourts people can meet in. Lifestyle. Interaction. Even views to parliament house from the apartments. It also makes multiple retail and food spaces viable. Not just a token café and a gym. 12 levels of accommodation just isn't enough. • To create an urban village I could find no mention in the document regarding the zoning. There needs to be added flexibility including convenience shopping…more than a 7/11 and not limited to 200m2 as previously found in Permitted Uses. A 1,000m2 Harris Farm, deli, fresh fruit store you name it. We do not want to hamstring the precinct but rather provide convenience and make it a hub like train stations found throughout the world? With respect to Barry Drive: • It is unclear intention for the balance of Barry Drive on the Turner side leading to Watson St opposite the park. It makes sense to increase the height of these to match the balance of the Northbourne Avenue as it is a major arterial road leading into the city. In general, • We again commend the work done to date. It is a great start and shows a lot of work has been done, albeit, [as a major stakeholder] we had no inclusion to date in the stakeholders workshops. Nonetheless, we support the progress made and look forward to working together and creating a better Gateway to Canberra.
83	The City and Gateway Draft Urban Design Framework makes more than 100 references to 'corridor', evoking images of a long passage to another place – it suggests a throughway perhaps with high defining walls. As a resident I would like to highlight that Downer is not the wall of a corridor but a suburb…. a residential area of minimal and low rise development largely admired for its historical treescapes and green spaces. The trees not only beautify the suburb they seem to guide the scale of local development…. and this is appreciated. I also note the framework is being progressed at a time of rapid and seemingly uncoordinated residential and other developments in the vicinity of Downer. There is no apparent recognition in the draft framework of the multiple changes currently being progressed for this area and no provision for an improved approach to ensure developments proceed in a manner that prioritises amenity of residents. With those comments in mind, while the draft framework's principle of graduated development from rural vistas outside Watson to more multi storey development from Antill Street to the City sounds reasonable, the residents of Downer should not be expected to bear the greatest impact of this approach. I write to defend Downer as a treed suburb for families not a through way and I would like to particularly make the following points: • a certain level of densification along the Northbourne Avenue corridor is consistent with increasing sustainability of Canberra, as long as that densification is not at the expense of the amenity and character of existing suburbs including Downer; • the draft framework's proposed provisions for multi-storey developments on Northbourne Avenue and neighbouring Downer streets are out of scale with the existing treescape and community expectations;

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	• proposed building heights of up to 18m and up to 12m in different parts of the suburb will change the character of Downer with likely impacts to include overshadowing of homes and increased traffic congestion with subsequent reduced pedestrian amenity; • I understand that two storeys is currently the maximum building structure allowed in Downer – the final framework should provide for no more than a maximum of three stories along the portion of Northbourne Avenue within Downer, with the existing two-storey limit adequate to provide graduation to the suburb's existing housing primarily single-level stock; • the draft framework proposes that neighbouring properties can have solar access reduced by as much as 20 per cent, without providing an indication of how this figure has been reached – thus implying that level of reduction is both reasonable and has in some way been given community endorsement. At a time when solar access is increasingly valued for both residential amenity and generation of solar energy, there is no justification for any significant decrease in solar access and the draft framework should not so hold.
84	I have read the two documents provided on the NCA report and submit the following: The joint ACT Government and NCA brief seeking public consultation on proposals to develop the Federal Highway and Northbourne Ave as a distinctive corridor through to Civic is in my opinion inadequate and dangerously shortsighted. The documents presented on the NCA and Have Your Say websites appear to only focus on creating a village atmosphere south of Antill St and the experience of persons travelling by car from the north, Sydney and beyond or light rail from Gungahlin. They only give a focus for the next 20 years not a grand vision like what this city needs for the next 50+ years that can be worked toward in stages. The report professes to promote use of public transport but ignores a vision for convenient access by persons arriving by train from interstate and the experience of persons arriving by air. The report also omits the experience of persons arriving from the south as far as Melbourne and Adelaide along Barton Highway and the Snowy Mountains along Monaro Highway. 1) I submit that the opportunity to build a distinctive corridor entrance to Canberra in the north ends at the intersection of Barton Highway and Federal Highway. So I recommend the NCA and ACT Government apply the boulevard type development reported at page 22 to the Barton Highway also. The documents propose Northbourne Avenue south of Antill St becoming a people focused boulevard and a transit corridor with a typical view on page 24. The Capital Metro project is in progress so I understand that decisions have already been made for composition of this part of the corridor through to 2030.. I cannot foresee the width available in the corridor as depicted in Figure 11 and 12 will be adequate post 2030+ unless the arterial network linkages are further developed around North Canberra. The reports do not refer any traffic studies / forecasts that support the vision presented. 2) Is there any practical limit to the traffic in Northbourne Ave wishing to connect with Commonwealth Avenue Bridge? What year would this be reached? What does the NCA and ACT government traffic model predict? There is no supporting document. I fear the congestion that will develop in the corridor south of Antill Street, with growth in number of visits arriving by private vehicle, freighters, densification along the corridor and growth in Canberra population in general, will be a disaster resembling Sydney Road.in Melbourne for example. Alternative routes around the city and crossing the Mologlo will be required post 2030+. I predict Majura Parkway will likely become the preferred fastest route and it could connect beautifully with Anzac Parade. 3) I submit that the NCA and ACT Government examine the access / linkages for developing Anzac Parade into the premier corridor. It has the requisite width and is elevated providing incredible vista toward the lake and parliament house old and new. It is already distinctive. It could be developed to be even more distinctive with great connection to the Commonwealth Park and Lake Burley Griffen. Another option the NCA and ACT Government should consider is focusing city government office and commercial development on the Macarthur Ave / Wakefieid Ave / Northbourne Ave intersection so that

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	the Dickson precinct can continue develop to the north with the village atmosphere. (The old NCDC and Territory and Municipal Services were once conveniently located here). 4) I finally recommend the NCA and ACT Government go further by presenting a city and gateway vision for 2050+ that includes arrival by rail and air and which can be worked toward in stages which will give a glimpse of what the options may be for my children commuting to work and how to drop their children off at school each day then to sports activities after school.
85	I'm a resident of Downer and I have read your City and Gateway Draft Urban Renewal Framework and Stage 1 Engagement Report with great interest. I support the tram. I also support increasing density along the Northbourne corridor, but I do not agree with all of the proposed height changes and rezoning, particularly within the suburbs themselves. I am concerned about three things in particular. The first is that there are not adequate public services in place and particularly, but not limited to, schools for the growing population of families with children. Providing additional capacity to existing schools or additional schools should not be an afterthought or addressed reactively rather than proactively. As a parent with a one year old and three year old, I'm worried about sending my children to overcrowded schools in a few years. What will that do to their quality of education, sense of community, and development? Secondly, I am concerned that raising the height of buildings and changing the zoning within the suburb of Downer, as proposed for houses along Banfield Street, Atherton Street, Bull Street and Blackett Street, will increase car traffic within the suburb and decrease the sense of community, walkability of our neighbourhoods, and safety of the environment for our children. I support increased density along Northbourne avenue itself, but not within the suburbs. I understand that you want to be able to step back the building heights from their maximum along Northbourne, but if it jeopardizes the livability of our suburbs, then the proposed high increase along Northbourne should be reconsidered as well because it should not come at a cost of the communities within those inner north suburbs that shape so much of what makes Canberra a wonderful, livable, strong city. I recommend slowing the pace of building up. I know increasing density is inevitable, but it also needs to remain at a human scale, like most of the great cities of our world that are able to maintain a strong sense of community and place. Give the urban ecology of Canberra a chance to adapt and respond to changes in a measured way that allows the existing community to evolve into the new space. Otherwise, you risk replacing the current population and ecosystem with a new populace and culture that will likely result in loosing much of what makes Canberra the wonderful place that it is now. Lastly, the poor quality of the higher density townhouses and apartment buildings that I have seen going up recently in places like Dickson and Gunghalin concern me greatly. Please consider the future of our communities and not just how things look in the days or months after development. Poorly constructed buildings age poorly, are socially and environmentally costly, and will bring down the quality of the neighborhoods and built environments over the long term. In addition, a lot of the energy efficiency ratings can be achieved with the equivalent of smoke and mirrors. There needs to be better policy, building regulations, and accountability in this area.
86	**Summary:** a) The framework is highly conceptual and strongly oriented to aesthetic and external values. As such it is in places unrelated to the actuality of the suburban spaces it is addressing, for example, on the Panton to Anthill St section there is simply not enough room to put the road, the light rail, the

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	30-40 nature strip, the service road (p23) and the development without significantly impacting on the fabric of the suburb and will have presumably a significant cost. b) More detailed consideration is needed of the specific impacts on residential properties. Future work needs to highlight where the Government will need to acquire land to achieve the informal park boulevard section. c) The potential design conflicts between the enthusiasm for urban village development and the concentration on a ribbon development along Northbourne Ave will need to be addressed. The proposed developments will operate as dormitories adding further population to what is a weak transport corridor, especially north of Anthill Street, while adding little to nothing to the character of the suburbs except as a wall. d) The affect of a ribbon development on the existing character of the suburbs, therefore, needs further consideration and an appropriate design framework. This may require a conceptual separation from the Avenue as a National Symbol from the avenue as suburban road serving suburbs already undergoing suburban renewal. Or greater integration of the two approaches. **General comments** 1) **The Background:** Although it is somewhat surprising that, after 100 plus years of Canberra as the national capital and the strict planning which that has entailed and the 50 years of benign neglect that the northern section of the Northbourne Avenue corridor has enjoyed the NCA is now interested in the corridor as an area of national interest. The recent proposal to redevelop the area with up to 6 story buildings as part of a wider framework for the development of the Northbourne Ave corridor is by necessity a preliminary document and as such not as well developed as it might and should be. The following comments relate specifically to the application of the framework to the suburb of Downer and Watson (designated as the zone of Informal Park Boulevard in the framework). The devils, as always, are in the detail. 2) **Conceptual Framework:** The Framework document is highly geared to the conception of the inner north as an urban space. While this is true for the areas close to the city centre for much of the region the spaces are suburban and will require the inclusion of frameworks which address the differences which appear, judging from the Framework's orientation, to centre around the relative value of the home as a centre of dwelling focus. The document's concentration on the external requirements of “place making” is necessary as an initial focus but a wider conceptual framework including the prior existence of “places” would appear necessary as planing becomes more focused. 3) **Problem of Northbourne Ave as a Residential site:** As a long term resident for the avenue (for over 50 years) I can attest that Northbourne Ave is convenient and central but it is not a desirable place to live. It is noisy, dirty (presumably polluted) and exposed to strong westerly winds and strong sun in the summer months. As a marginal space it does not enjoy the protections of inner suburban environments. The road is also increasingly congested in peak hours and it is doubtful with projected population growth that the light rail will alleviate that problem. The orientation of the occupation is by necessity towards the road not the body of the suburb and with the light rail the road's landscape is moving from suburban to industrial in content. Consequently the proposal to incorporate 30-40m wide setback which would seem necessary to mitigate the impact of the road on residents but will have a significant impact on the fabric of Downer (see below). 4) **The problem of Ribbon Development**: The traditional role of ribbon development as a village or local shopping high street has appropriate value as does the development of along Northbourne Ave closer to the city where it is supported by the Civic and Braddon precincts. However, when

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	applied to suburban settings it is a transport planner's solution to road construction costs and makes little sense in terms of place making as residents are located on a transport corridor which is no more than a transport corridor and which is itself coming under increasing pressure. In the framework the extension of a Northbourne development to the suburban settings of Downer and Watson represents a ribbon which does not relate strongly with the suburb as a whole. The prospect of placing more people on the route which is already less than optimal as a suburban environment is, therefore, questionable in terms of the the wider sense of community character which the framework wishes to foster. Beyond the proposed urban villages there will be little distinction to living in one section of the corridor to another except in terms of distance and travel times. 5) **Suburban Character:** The problem of increased residential density along the Northbourne Ave corridor north of Anthill Street will certainly mirror the sense of the inner city in terms of noise and pollution exposure but runs the risk of reproducing a series of dormitories which do not relate to the wider suburban precincts well and will operate somewhat like walls. Only in the last 10-20 years, some 50 plus years into its existence, is the inner north beginning to develop sufficient regional diversity around shopping centres and distinctive suburban character to make the place an interesting and desirable place to live. It is important to maintain the momentum towards these suburban village communities which we see particularly in around Lynham, Ainslie and Watson. This is not acknowledged as a valuable process in the Framework. This is especially urgent for Downer because it has through past planning decisions, which have not been optimal, lost its school and shops. Both of which have significantly affected its character. The loss of the schools constituted a major blow because their absence created a sense of Downer as a provisional place without a valued viability; a sense that seems to perpetually stalk the suburb as a place. The presence of major roads on the margins and dead shops at the heart of the suburb for many years created and exacerbated this sense. The suburb doesn't need more damage to its fabric. *Connection to the equisting Character:* Equally important, but not acknowledged in the framework document, is the concept of the suburban space as a place of dwelling through the development of a sense of 'caring' for residence, place and community. There is nothing in the framework about how the the proposal will contribute to the existing sense of 'sustainable communities and urban culture'. In effect, the implications of the framework which are aimed at developing the urban character of the corridor don't appear to take the impact on the wider suburbs as a whole into consideration. *The problem of the Setbacks and community integrity:* When taken at face value the plans for the Informal Park Boulevard as outlined in the framework (see page 22 and 23) appear to constitute a radical ingress in to the fabric of the suburb (see below comment 7a) that their implementation will further increase the sense that Downer is as place without an internal community value. 6) **Transition Zones:** With any major thoroughfare there will be by necessity a zone which transitions between the functionality of the road and the residential amenity of the suburb. At present the Northbourne Ave service road, Swinden St and Atherton St perform the important function of safely transporting residents of Downer and Watson on to the major transport routs at the Northbourne Ave and Anthill St intersection. The Framework document does not take the importance of these zones into consideration and in fact the proposals if taken at face value threatens to disrupt the existing function. (See 7b below) 7) **Specific Problems:**

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	a) The Setbacks: - The setback on the Informal Park Boulevard as outlined on pages 22 and 23 can not be applied to the existing street layout, especially from Panton Street to Anthill Street section, as the current median strip is only 10-17m. Extending the median to the proposed 40m (which would be ideal) would mean the removal of the service road and the houses along the eastern section of Northbourne and the repositioning of the road to the back of the western side of Blacket and Atherton Street residents. - Alternatively the houses on the western side of Blacket and Atherton Streets could be removed and the proposed developments could be located on the eastern side of Blacket and Atherton, using those streets as the service road and pushing the second level of development further into the streets behind. Needless to say this would make the existing properties on the Northbourne Avenue service road unsalable and radically cut into some of the most beautiful streets in the suburb both of which have seen recent and valuable redevelopments of some properties. b) Traffic problems: If the existing street configuration are retained then the impact of traffic movement will present major difficulties. The Northbourne Avenue service road is only 5.5m wide. It is use by cyclists as a way of moving to the Anthill street lights and the Northbourne Ave cycle way. With the new slip road allowing motorists to leave Northbourne and travel down the service road to cut the lights at Anthill Street there is also an increase in car traffic on the road which is now operating as a third lane for Northbourne Ave during peak hours. This mix of narrow road, cars and bikes at peak hours is dangerous. Recently a car failed to negotiate the slip road and crashed into a tree on one of the facing properties. If the proposal to block car access from the service road to Swinden St is followed through then all traffic from the development will be channelled down Panton, Atherton, and Bull Streets onto Swinden and Blacket. If the access from the service road to Swinden is retained then a potentially dangerous intersection will be created. Until the give-way signs were implemented in the 1970s there were numerous accidents on the intersection (one of them fatal). - The development of units along the service road will have the capacity to create major parking problems on the street which will become dysfunctional as a two way thoroughfare and significantly affect its capacity as a transition zone, as will the increased use of the road resulting from the proposed development. Prohibiting parking will simply shift the problem into the suburb, affect the functionality of the development while widening the road will cut into the separation of the development from the avenue or from the service road. c) The Canyon Effect: The issue of proposed building height has been canvased on the public meeting on the 9th. An aspect which was not discussed is that given the existing width of the median strip between the avenue and the service road the impact of the the proposed heights of 6 stories on the feel of the space will be much greater, mirroring the proportions which are seen closer to the city. This will not achieve the spacious boulevard effect that the NCA is seeking. d) Northbourne Ave Capacity: With four lanes, the capacity of Northbourne Ave from the border to Anthill Street is no greater than, for example, Phillip Ave and Anthill St. In fact it is narrower than both. The viability of concentrating more development along that section must, therefore, be limited and questionable. The proposed increased number of traffic lights on the avenue will also slow the route down further adding further weakness to it as a major transport corridor for cars especially. 8) Wider Strategic Context: If the aim is to increase the residential density of Canberra, which appears to be a pressing necessity if the city is to

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	accommodate a significant population growth over the next 13-30 (p.8) years, then the question becomes whether it is better to concentrate the local increase in a ribbon which will not relate to the suburbs and has the potential to radically affect the fabric of the suburbs or to more carefully plan to distribute more modest developments throughout the suburbs as a whole. A more general discussion on how the Northbourne Ave development would fit with a wider strategy of urban infill and "renewal" would seem necessary. **Specific Suggestions:** 1) That the NCA and Act Government frameworks be broadened to consider the impact of the avenue on the existing character of the inner north, specifically Downer and Watson. That would seem to require that the NCA and ACT Government plans either be conceptually separated or more adequately integrated. -If the existing street configurations are left intact then the proposed changes to Northbourne Ave are, especially north of Anthill Street, ones of suburban renewal; a process which is already underway and does not need to be linked to the high concept National Avenue aspect which is presumably the focus of the NCA's interest.. - If the NCA aspects of the plan are to be implements in their totality then the framework needs to develop further with more detailed consideration of the impacts on specific locations and the existing character of the suburbs. 2) That provision be made for the consideration of integration with the more general plan for the future development of the inner north, especially the suburban areas which have historically no been seen as parts of a national treasure precinct. 3) In terms of the consultation process with Downer residents it would be desirable sooner rather than later to a) create a set of well conceived and implementable plans, and b) set up a process which directly address the concerns of those who are most immediately affected by the proposal namely the residents who will have to dispose of property, or have them resumed, to make way for the developments and secondly those who will be affected by shadow and increased and traffic flows. 4) The proposed height of 5-6 stories along the Avenue north of Anthill Street seems inconsistent with the plan to scale heights back as you draw away from the city centre. As noted the geometry of the existing avenue would suggest lower heights (3-4 stories with max height 3 stories) would be more aesthetically appropriate for the suburban area. 5) That further thought be given to a more general development framework for the most effected suburbs. For example, further development of varied medium density development (3-4 stories of mixed residential types with maximum heights of 3 stories above ground) throughout the Downer and Watson to try and mitigate the negative concentration of development on the fringes of the suburbs. This would require careful planning to retain and enhance existing suburban character, improve housing range and avoid the loss of entire streets to 2 bedroom units which has happened in O'Connor and Lynham. Consideration might be given to using transferable development rights as a way to effectively facilitate the process. This process requires additional planning but can potentially allow for height variation, diversity of character and dwelling types, while providing flexibility for residents and developers in redeveloping or adding value to their land. It also reduces the sense of winners and losers in rezoning decisions. 6) That the government highlight where and if they need to acquire land to achieve the Informal Park Boulevard as soon as possible. Specific Questions;

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	1) How will the proposed setbacks impact on the fabric of the suburbs? 2) What level of betterment tax does the ACT Government charge on property sales uplifted by government rezoning decisions? 3) How will the rezoning affect rates? 4) What specifically will the process of redevelopment look like and how long will it planed to take? What sort of time frames do residents face? 5) Will residents be consulted in regard to block consolidation and will the consolidation take the existing housing configurations into account? 6) What assistance will the ACT Government provide to residents required to sell property in the development zone? 7) Will there be a requirement for compulsory acquisitions?
87	I am just getting information about the above Framework and am feeling a little concerned. I have looked at the PDF document on the Your Say site and am not sure what is planned for the Downer area I live in. I live on [……..]. I would appreciate some clarity on development plans in this area. Is the intention to build apartments/townhouses on the green area at the back of our house? Where is the 'informal park boulevard' situated? In the middle with the light rail or behind us where there is already a green area which people use to walk their dogs etc? Where are all the apartments/townhouses going to be situated? The information provided so far does not make this clear. • I am also concerned about the height that is being proposed as this is clearly not in balance with the surroundings - should be in proportion to the surrounds • lack of infrastructure in the area - schools have been closed in recent years - the shops are over crowded - parking is a major issue • lack of solar access being proposed 4 hours is very inadequate - our home is a new solar passive design that relies on a min or 8 hours a day to function as it was designed • Downer has not been designed for this density of population • what are the details of the development at Yowani and Kamberra Wines
88	**Summary** I am primarily concerned that the Design Framework does **not**: • present a suitable heritage policy and process based in the NCA's clear legislative obligations and its own guiding document, the National Capital Plan, for the proposals in the study area, nor does the Design Framework deal adequately with the ACT Government's listed heritage within or adjacent to the area of the project; • provide any information on service infrastructure provision and related implications for staging and public purse costs– the Infrastructure Plan should be publicly available as it should; • acknowledge historic or natural heritage under Identity, or historic heritage as a park or destination theme; • protect Canberra's landscape sufficiently with recommendations for the supposed Landmark buildings at nodes/intersections and enhance it with new public parks (provided by government) to take the pressure off existing parks, considering also the potential loss of West Basin's Acton Park, as well as a counterpoint to the extensive new building programme; • misrepresents the virtues of the project to protect and enhance the Gateway to Canberra (particularly in Figure 4) and the Bush Capital concept with the non-human scale and mass of buildings proposed, its diminution of broad vistas to the east and west, its transitional ideas of gradual

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	change rather than retention of wide bush views and bush, throughout the corridor, and, in one respect, clearly undermines the Gateway concept with a suggested change of Northbourne Avenue from an arterial road to a transit route; • misrepresents and overstates the numbers of dwellings to be created by the project by at least 8,000, about 22%; • consider highlighting interpretation, conservation or 'hardening' of historic heritage sites given the expected increased usage from the increased densification and consequent population; • provide a realistic appreciation of resident parking or public parking in the Corridor or city centre, including for major public events (with the loss of West Basin to development) given the spatial distribution of Canberra and regular private vehicle movements required above and beyond any possible provision of public transport; • ignores the need for inclusion in the project or elsewhere in the inner north, of accessible/public/affordable housing particularly to offset the losses to private development, and it would also improve the generally poor provision of this in the ACT; • include any commentary on the landscaping required around the light rail but does include extensive intent and design detailing of the verges, fulfilling public commitments made when the previous extensive landscaping was removed; • reassure with the proposed urban villages and plazas, what threats do these pose to existing suburban shopping centres and why is one required at Dickson with the proximity of a large, existing centre (what of 'active travel?)?; • provide sufficient justification of the change of Northbourne Avenue from an arterial to a transit route; • consider the numerous serious implications for the inner north suburbs of rerouting through traffic from Northbourne Avenue to divert it from the city centre, into 'improved(?)' suburban streets, and the impacts on heritage places, including the Australian War Memorial and ANZAC Avenue; • 'support a more compact and higher quality environment' as 'the people-first approach' clearly does not support the existing inner north community people or their environment with the imposition of the proposed traffic redistribution; and • consider the threat to the historic heritage values of Haig Park by proposing to insert in it three wetlands nor does it refer to the Conservation Management Plan under preparation. **General** **Heritage** The word 'heritage' is used several times in the document either in reference to the Sydney and Melbourne Buildings, Haig Park, Sullivan Creek, Indigenous heritage or, intriguingly, something called 'future heritage' and only the 'history' of the Northbourne Housing Precinct rather than its formal, recognised heritage value. This is manifestly insufficient coverage of the concept in the Design Framework document in the context of various statutory and other requirements. The *National Capital Plan* (2016: s2.4.4, 17) (the *NCP*) requires that Designated Areas be considered Commonwealth Areas under the *Environment Protection and Biodiversity Conservation Act (1999)* (the *EPBC Act*). The Northbourne-Federal Highway Corridor is a Designated Area. So, it is a Commonwealth Area and this requires the NCA, under the *EPBC Act*, to have identified any heritage in the Corridor and to assess, manage and conserve it, including timely and appropriate community involvement. This is primarily a reference to the need to comply with the Commonwealth Heritage Management Principles. The *NCP* suggests, in the wording of s2.4.4, the NCA has discretion in its application of the *EPBC Act* – this is not correct, as this statutory responsibility overrides the Plan.

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	The City and Gateway Draft Urban Design Framework is statutorily inadequate as a planning document - it does not properly present or reflect the legal responsibilities of the Commonwealth and also the Territory, in this joint project, to protect the heritage values found, whether they be currently recognised at the Commonwealth/Territory levels, such as, for the Commonwealth, the Australian War Memorial and Memorial Parade, or are yet to be identified in the Corridor (or adjacent to it and could be affected). Presumably the Territory Government is relying on the NCA to have complied with any Commonwealth statutory requirements. This may be misplaced. Whilst the project and the document is a collaboration of both the NCA and the Territory's Environment, Planning and Sustainable Development Directorate, other NCA design strategy/guideline/framework/structure documents (eg Acton Peninsula Precinct Plan, Commonwealth and Kings Avenue Design Strategy, and the West Basin Precinct Guidelines) all have similar deficiencies in their poor reflection of the NCA's statutory responsibilities to protect heritage under the *EPBC Act*, suggesting an institutional and systemic issue of non-compliance. It is also noted that the *NCP* (also at 2.4.4) requires the NCA, in relation to Designated Areas, to follow the AICOMOS Burra Charter and the Natural Heritage Charter, which is a commitment to heritage best practice. There is no evidence provided in the City and Gateway document that the NCA has been following this basic requirement either. Heritage identification surveys of the NCA's Designated Areas, at least, should have been undertaken after the legal obligations arose, rather than at the time of a particular development proposal, consistent with the obligation under the *EPBC Act* to know and care for the heritage the Commonwealth Agency managed, by preparing a Heritage Inventory and a Heritage Strategy covering all the Commonwealth Area it owns or manages. However, if the surveys were not done in advance of such proposals then they need to be undertaken when proposals may be being prepared. The identified heritage places/values can then be properly considered in the related development planning as best practice heritage planning requires. It is unclear whether further heritage places or values may have been identified beyond those already known but they may have been, in any case this, would only be revealed by undertaking such surveys. Best practice heritage planning would then require a conservation heritage management plan to be prepared prior to any development being planned, then a heritage impact study prepared in response to a particular development. There is no evidence in the Draft Urban Design Framework that either has been or will be prepared for the City to Gateway project, leaving the joint project liable to charges of being in non-compliance, both statutorily and in respect of a key planning document of the *NCP* for both the Territory and the NCA. This seems to be a serious omission. Even if the Commonwealth has not contributed commentary on heritage, the ACT Government has its own direct responsibilities for its listed heritage places within the areas affected and these relate to potential direct/adjacency effects in the Northbourne-Federal Highway Corridor (such as on the Northbourne Housing Precinct, the Sydney and Melbourne Buildings, Havelock House, City Hill and Haig Park) as well as indirect or projected effects outside this on other heritage from proposed new urban villages or traffic changes (such as on Dickson Library, Corroboree Park Housing Precinct, Alt Crescent Heritage Precinct, the Whitley Houses, the Ainslie Hotel, the Australian War Memorial, or Anzac Parade). As an example, ACT Heritage Listed Haig Park is directly affected by the Draft Urban Design Framework as the document reveals that three wetlands are to be sited within it. As a participant in the Haig Park community consultation process, I cannot recall this proposal being mentioned and it appears to be directly antagonistic to the intent of the planning to conserve the Park's identified heritage values. Broadly, the Park's identified heritage values, and its related management, relate to its historic environment cultural heritage values so it would be surprising if the idea for such works that would adversely affect these values would be sanctioned in the currently, under-preparation, Haig Park Conservation Management Plan, although, it is worrying that this Plan will not be exposed for final community comment before release.

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	There is a paucity of ACT Government information in the document on these listed places and the vision for them, including details of the relevant 'intent' and 'design criteria', despite the clear statutory responsibilities acknowledged for them under the ACT's *Heritage Act (2004)*. The consequence of the apparent neglect of this heritage planning may be the destruction or damage of currently unrecognised heritage, presuming also, of course, that presently recognised heritage will be appropriately conserved – although, even this is unclear as the document, as noted above, does not give sufficient space to heritage. Heritage is another design parameter. A heritage inventory and its fate should be clearly presented - what it is in the development area, its significance and how it will be treated, consistent with existing statutory protections. These important aspects of Canberra's cultural fabric should be part of the design framework document, in the absence of separate, proper heritage planning documents, and dealt with in terms of the document's approach of 'intent' and 'design criteria', particularly if this is the only way such critical features are to be acknowledged, respected and protected. The obvious first place in the document to have included the necessary high level introduction of heritage, such as the Commonwealth and ACT Governments' statutory obligations and need for adherence to best practice heritage planning, where there is currently no mention in relation to the NCP, Territory Plan (TP) or the wider legal responsibilities, is in the Planning Context section of the Draft Design Framework. As noted, this is a critical omission and ignores a social contract, apart from any legal obligations, that the Commonwealth and ACT Governments' have, respectively, with the nation and the Canberra community, to conserve Canberra's significant heritage places. **Infrastructure** The question of service infrastructure required by the proposed increase of tens of thousands of dwellings in the City and Gateway project is only mentioned very peremptorily in the Executive Summary in terms of a special Infrastructure Plan that has been prepared. This is manifestly inadequate. Stormwater is mentioned in the Framework but surprisingly not the utilities of water, electricity, gas and sewerage. An appreciation by the community of the required scale and implications of the infrastructure renewals and capacity upgrades, in the inner north with its aging infrastructure, should be presented, and is seemingly possible if that other report is completed as stated. A political motive might be suspected in this exclusion of infrastructure detail. A fundamental project parameter such as this, that merits and requires its own separate report, necessitates more space in the Draft Urban Design Framework. It is likely that existing infrastructure will need to be improved significantly with the proposed degree of change. Another implication is in terms of timing for the whole City and Gateway project. Any development cannot proceed without the infrastructure requirements being known and provision made. It is a major project in its own right and probably a very expensive, consequential cost of the project, most likely to be borne by the taxpayer. The overall development will likely need to be staged so as to be in step with service infrastructure provision. Apart from this practical staging, related sequentially to different zones of the overall project area as the services in each zone are updated/renewed respectively if required, is the issue of ACT budgeting. The project has been described in the media by bureaucrats and politicians as a '75-year vision'. This is perhaps, in part, a comment on the need to spread public expenditures over many decades to increase the project's feasibility as individual aspects of the development are progressively programmed and realised, supported as necessary by service infrastructure improvements. It is therefore important to introduce the infrastructure improvement implications more fully into the Framework Design so that the community can assess what is being proposed more realistically. Perhaps, in the interests of transparency the Infrastructure Plan should be publicly available and any staging implications, the scale of works and indeed any broad costings, that are already known now from that Plan, should be in the Draft Urban Design

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	Framework. **Detail** **Preferred urban form and renewal approach** A number of the Figures and Maps, including that (Fig 3) associated with this section, include the 'City Expansion to West Basin' development, yet it is not part of this City and Gateway project, and here its estimated dwellings of 8,000 are added to the increase in dwellings projected for the City and Gateway project. This is a misrepresentation of the benefits of the City and Gateway project in an effort to boost its apparent virtues. A more accurate estimate of the increase in dwellings would therefore be 29,000, although, the further tenuous 8,000 claimed for the Northern Investigation Corridor also seems suspect and the real figure may be some thousands lower. The several stated qualities of the preferred urban form, such as Integration, Hierarchy and Landscape, seem to set up a conflict when considering the tall, Landmark buildings. These buildings are patently not 'integrated with…the broader landscapes', as the 'landmark buildings…punctuate the skyline' so they do not 'make a positive contribution to the shape and character of the approach route into the city centre', and whilst they do 'ensure the buildings demonstrate the relationship with the landscape…' it is not a positive relationship. The Landmark buildings, with their great height compared to the buildings around them, are in conflict with the character of the rest of the corridor now, and as proposed. Their presence at corners wil unfortunately frame and truncate views to the landscape beyond when travelling along the corridor, providing a narrow view, a glimpse of distant topography to the East and West, as it is passed, rather than the present broad vistas at and approaching the intersections where they are to be sited. The distant, broad views should remain a key feature of the gateway to the Bush Capital. Let Black Mountain with its Tower and the other familiar topographic features of the approach, such as Mt Ainslie, continue to be the Capital's landmarks. Intersection markers such as those proposed are not required. They only seem to be proposed at all as node, high rise, developer opportunities because they would be more obviously intrusive elsewhere. They are definitely not positive additions to the design framework for the corridor and should be eliminated from the design framework. **Approach to the Capital** Figure 4 purports to show the Corridor Framework and it does show the corridor's approach stages as used in the Framework, however, it gives a false impression as excluded are key features, existing and proposed, such as the Sydney and Melbourne Buildings, Vernon Circle buildings including the Law Courts, and the West Basin development. This latter item is included in other renditions in the document, in a very selective, misrepresentational process as its not part of this project (see above). Without the inclusion in this Figure of these omitted items at the southern end of the City and Gateway project, a reader may be given the impression of an alignment but not the reality of a clear, clean vision of the corridor's link to the Central National Area and Parliament House as the Gateway is supposed to be. The reality is somewhat different with buildings being crowded into this area to clutter a currently reasonably clear association between the corridor and the heart of the nation's capital, with its broad vistas of and across the Lake, as it is approached from Northbourne Avenue, around Vernon Circle and along Commonwealth Avenue. It will no longer be a Gateway – Figure 4 appears to be deliberately misleading in this regard. It is understandable why these items have not been included, as it would subvert the central tenet of the Design Framework. A key statement that underpins the Framework is found here. The proposed transformation of Northbourne Avenue from north to south is envisaged as '…the transition from a 'bush capital' character to a progressively more formal boulevard towards the city centre'. As noted above, Landmark buildings will contribute to this transition, but also, so will the wall of increased height and mass, buildings of non-human scale, down both sides of Northbourne Avenue, eliminating views out, and getting higher, the closer to the city centre. Additionally, the wall proposed to edge Vernon Circle and Commonwealth Avenue

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	from the West Basin development will also constrain the visitor's views approaching the Lake and this development is also eliminating Acton Park with numerous bushy trees. The conceit used in the Draft Design Framework, of a transition from bush capital to a formal boulevard, seems more about development opportunities rather than considering what existing elements in the corridor might be preserved or enhanced to maintain the Bush Capital image, an image which enshrines many benefits of the present urban environment of Canberra with its Y Plan, Garden City elements, significant plantings of exotic and native street trees, green spaces and vegetated hills, Lake Burley Griffin, the proximity of Namadgi, recreational areas, and the numerous breathing spaces of parks and gardens. All of which, and their accessibility, improve our citizen's health, lifestyles, amenity, and moderate climactic extremes, plus helping to conserve our disappearing native flora and fauna. The route down the corridor from the Federal Highway to the Central National Area should not just be a transition from bush to city but be a more gentle transition with elements of the Bush Capital to still be found along the way. Haig Park should not be the only surviving public, bushy area. It is not sufficient to rely on vegetation on private properties along the route and the proposed verge plantings. There should still be available broad views of our topography and 'bush' from as many locations as possible along the route right down to the Lake. This would mean the abandonment of the West Basin development as currently envisaged, reduced building works on Vernon Circle, generally lower building heights, no high Landmark buildings but occasionally new parks or green spaces through the blocks and in the surrounding suburbs. It is notable that there is no provision for new parks in this very heavy building programme of larger footprints and taller buildings, and only more intensive use of existing park areas, including of the Sullivan Creek corridor, for the projected large increase in population and density. **The approach route** Signs are proposed to highlight 'cultural/historical landscape'. This is fine as far as it goes but the heritage features to be described in the signs also require attention – management and conservation and in some cases 'hardened' to ensure their survival in a future of higher population densities and pressures. **Urban design guidance** The proposed reduction of the number of private vehicle parking spaces for individual developments as a move towards greater sustainability, seems an unrealistic expectation in a city with great comparative affluence, likely affluent occupancy of new buildings as a result of no mandated and limited provision, if any, of affordable housing in the development corridor. This is coupled with the well-known large distances in Canberra with its extensive road networks, between homes, and work places, educational and pre-school locations, medical centres, shopping centres, entertainment, sporting and recreational facilities (etc) and poor public transport provision, requiring frequent movement by private vehicle. The provision in new buildings of a small number of dwellings without associated car spaces, do offer more diversity in housing options for those who may require them or wish to purchase a cheaper property but to reduce car spaces to a significant degree across all buildings seems impractical given the above circumstances of the Canberra urban spatial form. The significant reduction in ACT public housing over several decades continues with this project. Inadequate replacement is occurring across Canberra and when replacement, usually of fewer dwellings compared to those lost by private development, is considered, it is away from the city centre. Public housing is not seen as a priority, although a recent ACT Assembly decision will lead to a marginal change for increased affordable housing targets in new housing. The notion of affordable housing as a potential object in the Corridor is treated without force in the document. This is most unfortunate, both as an opportunity lost and seeming confirmation of the charge of an ACT Government policy of elitist, social cleansing, considering the removal of significant public housing from the Corridor and elsewhere in, and not just, Canberra's centre, and as there is no real attempt to allow for such housing replacement,

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	or otherwise, in this project. It is unclear why this project appears to be quarantined from the new, if relatively weak, public housing initiative but it might suggest that the 'renewal' project is more about profits for private developers and financial returns for the ACT Government than the community's real needs. **Building height and nodes** See the above comments but, additionally, the claim here that 'Building heights have been established to respond to Canberra's landscape qualities and ceremonial qualities.' is not established by any provision of argument or evidence. Proposed node/landmark building heights, in particular, cannot be justified through such statements alone. They obviously do not respond to Canberra's landscape qualities or ceremonial qualities (whatever they might be). **Building interfaces** The listed building edge types and ground level public real interfaces include 'Residential' but for some reason this category is not depicted on the opposite Map 8 Desired building edge locations. **Public realm and verges** It is unclear, as indicated above, why no new parks have been provided in this urban corridor or adjacent areas to balance the massive increase in density of buildings and people, to provide for recreation, health, the reduction of the likely increase in urban heat islands, and other benefits. The potential removal of Acton Park at West Basin, increases the pressure on surviving parkland. Only an increase in the intensity of use of existing green spaces is contemplated in the document. **Landscape design** The Intent section here, recognises that landscape design offers the potential to soften 'the impact of larger building form and provides visual relief to the urban condition consistent with Canberra's status as the Bush Capital'. Whilst this is true to an extent and to be commended, it is unlikely to be an effective antidote to the non-human scale of the many large buildings allowed, particularly those at nodes/Landmark buildings. But it is interesting that it also seems in apparent conflict with earlier statements where the evidence of the Bush Capital is being eliminated the closer the corridor comes to the Lake. The appropriate antidote has to include smaller and fewer buildings and those allowed to be of a human scale wit,h consequentially, more green landscape between and beyond. It is odd that the document at this point, whilst it deals convincingly with verge landscaping, is silent on the critical landscaping of trees to hide the tram and its overhead wires, and also reduce any noise the trams may produce. Trees adjacent to the tram lines can nevertheless be seen in the several provided cross sections of the Corridor but there is no textual detail. **Urban village framework plans** There does not seem to be sufficient justification for the 'urban villages' or 'urban plazas'. The rationale provided is 'to create a more active precinct' with convenient, small scale retail and employment opportunities within the immediate vicinity of rapid transit. It sounds intuitively like a good idea to provide such facilities handy to the new denser, zones of residential accommodation. A coffee shop and convenience store may not be a problem. However, the proposed villages if they have more functions will decentralise and pressure, to some unknown extent, the current pattern Canberra's suburban/local shopping centres on either side of the corridor. Depending on what is provided in the new villages they may reduce the importance of the relevant local

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	shopping centres, even threaten them and certain aspects of their critical mass of interrelated functions. For example, a node bottle shop or a newsagency may make a difference to the economics of a similar business at a local shopping centre. The Dickson urban village seems particularly without justification given the proximity of the large shopping centre already adjacent. No evidence-based discussion of why these villages, particularly Macarthur, are needed and how they are likely to impact on the existing local shopping centres is provided but it would seem to be required to support the proposal. But it still should be noted that the 'nature and extent' of the urban villages will determine the criticality or marginality of them as competition for existing centres. **Strategic transport network** Figure 9 is more diagrammatic than actual so the routes indicated are tricky to match to real streets but it does seem that to facilitate the change from Northbourne being an arterial to a transit road, through traffic, including trucks and other large vehicles, is being pushed onto the lesser suburban roads of the inner north and the primary, eastern distributor route to direct traffic around the city centre, a proposed new arterial road, is Limestone Avenue. The consequences will include the development of 'rat runs' in streets parallel to Northbourne Avenue (for example in McCaughey Street with its school zone, and Forbes Street, an already narrow street), or access streets, such as, Ipima Street with its roundabout and school zone, unacceptable levels of noise, pollution, congestion, commercial vehicles, safety and amenity issues and reduced property values forced on residents (and users). No solutions to these major adverse consequences is proffered. The proposal is unworkable so any immediate works proposed as the basis for these future consequences should not be proceeded with. It seems that the justification for the new strategic network is a suggestion, because of the insertion of the new light rail into the Northbourne Avenue (which will not reduce traffic lanes), it should now be classified, as primarily, a public transport corridor and then, consequentially, as a transit, rather than an arterial route. This would then allow, it is suggested, for the proposed Northbourne Plaza between the Sydney and Melbourne Buildings, including the reduction of the lanes from four on each side to, ultimately, two. The impact of these major changes to the 'Gateway' from the halving of the Northbourne Avenue lanes, and creating the proposed Plaza, on inner north suburban streets and residents, and on less than straightforward, through traffic arrangements, is and does, appear to be unnecessary and unjustified. There will be another form of public transport on Northbourne Avenue but this should not be seen as an excuse to cause the proposed considerable disruption in the inner north suburban road network which was not designed for supporting arterial traffic but more low key movements. The hierarchical distinction proposed is unnecessary – Northbourne Avenue is both for transit and arterial traffic and should remain as such, particularly, as it is a 'Gateway'. **A people-first approach** Given the traffic issues mentioned above, it might seem that this heading should be interpreted as preferring one sector of the community over another – travellers over residents - rather than striking a balance. This seems confirmed by the statement: 'A transport user hierarchy with a people-first approach places the highest priority on pedestrians, followed by cyclists, public transport, and lastly, private vehicles'. However, where is the wider community and residents in this simplistic formula? It is an admirable sentiment if there are no wider diseconomies or adverse consequences elsewhere but the changes to Northbourne Avenue in the hierarchy do put a major burden elsewhere that is not really taken into account here. This aspect of the proposal will not 'support a more compact and higher quality environment' as claimed as inner north residents will be severely and permanently disadvantaged to allow for these proposed city traffic diversions (see above) and the Northbourne Plaza idea. It is decidedly not 'a people-first approach'. **Strategic walking network**

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	A strategic focus listed here is: 'reducing the dominance of vehicle traffic and parking in prime city locations'. This seems like a good idea but it is not realistic if the city centre is to flourish and be useful for those working there or using its wide range of services. Vehicle traffic and related parking is a fact of life given Canberra's spatial design – Canberra is dependant on the private vehicle. Public transport will never remove private and commercial vehicles. Parking is being reduced in the city centre as more and more parking land is consumed by development in any case. The reasons why parking and vehicle access needs to be maintained in a city centre are numerous (see above) and self-evident. Additionally, if the West Basin residential development proceeds then alternative parking for major public events at Commonwealth Park will need to be found. Perhaps the City and Gateway project should consider this large parking requirement as another imperative for inclusion as no current or future public transport option will be sufficient to resolve this issue. **Strategic road network** This 'need' to change the road networks is not established in the document. It is a misplaced aspiration (see above). It takes little or no account of the consequences for the inner north community, as noted. **The changing role of Northbourne Avenue** There is no mention here of the implications for the Gateway concept for Northbourne Avenue. To change this route from an arterial to a transit road makes a nonsense of it continuing to be seen as a Gateway. Traffic modelling is put forward as a support for the change and this includes reprioritising the road user hierarchy and improving alternate traffic routes in the inner north that supports travel on routes other than Northbourne Avenue to facilitate the removal of half the through traffic. But the question not posed is why do we need to remove through traffic from Northbourne Avenue? It is implied to be inevitable. No arguments are put forward as to the reason for this, only the advantage of creating Northbourne Plaza. This does not seem to be sufficient to justify the consequences. The implications for inner north residents and local traffic is not contemplated at all in the Design Framework. The various probable, impacts are itemised above, however, other issues such as balancing the heritage threats that will arise (see above) and the ceremonial qualities of Northbourne Avenue versus those of the Australian War Memorial and ANZAC Parade, part of the proposed alternative diversionary route (Map 14), are somewhat problematic and not contemplated or considered in the Framework document. What are the improvements required? Adding lanes to existing suburban (for example, on both sides of Wakefield and Limestone Avenues, and the ceremonial road of ANZAC Parade)? The major traffic redistribution suggestions would not seem to be socially or otherwise acceptable in their likely impacts where they relate to pushing through traffic into the northern suburbs on either side of Northbourne Avenue. **Proposed changes to the road network hierarchy** The statement that 'Over time, Northbourne Avenue is transitioning into a transit boulevard' is presumptive rather than fact. It is only based on this document. There seems to be no policy quoted external to the document that will cause this. Then it is noted that "to support this transformation, it is proposed that Northbourne Avenue's road hierarchy classification be changed from 'arterial road' to 'transit corridor'". Neither the first presumption or the following proposition are sound. The statements seem to be being made to support a misplaced vision rather than be good public policy. As stated above, the Framework document makes no attempt to query why Northbourne should not carry through traffic or balance the implication of the proposed change to traffic distribution in terms of the various negative burdens on the residents of the inner north, on heritage values and ceremonial routes, on the Gateway concept, and on other factors – it is certainly not a 'people-first approach'. This is a great weakness of the document. **What makes good places and streets?**

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	An unfortunate omission under Identity is: • Acknowledge historic and natural heritage **Destination park themes** Heritage has also been omitted here as a park theme. **Northbourne Plaza** The proposed reduction in traffic lanes, albeit over time, is only warranted if the proposal to eliminate through traffic from Northbourne Avenue and its reduction in status from an arterial road and the Gateway eventuates. **Revitalise Haig Park** Why is the basis for this 'revitalisation', its ACT Government heritage listing under the guidance of a consequentially required Conservation Management Plan (CMP), not mentioned here? **Connect and enhance Sullivan's Creek** Of the five new wetlands proposed, three are placed in Haig Park (see Map 18). This development proposal would seem contrary to the intent of the conservation of its particular, primarily, historic heritage values. The suggestion is likely to be antagonistic to the new CMP. **Increase active travel opportunities** (in Sullivan's Creek corridor) Contrary to passive recreation options, the proposed increased active travel opportunities here may lead to both over-utilisation and threats to the Creek corridor's positive qualities both natural and recreational (that might otherwise be there, in part, for the benefit of the increased resident numbers), as well as use conflicts. The use and pressures on the corridor require monitoring and careful management to reduce the potential for adverse effects. The development of new parks in the Northbourne Avenue corridor and beyond could take some of the pressure off the reliance being placed on the Sullivan's Creek corridor for park-related benefits for the existing and additional population. **Sustainable communities and urban culture** The delivery of high quality public spaces is part of the Intent here but nothing is proposed in terms of the making of new public parks, only utilising such existing spaces as Sullivan's Creek corridor and Haig Park. In such a huge development as contemplated by the Design Framework, funds should be available to provide and develop such spaces to both provide for the new people but also to relieve some of the pressures likely on the existing public spaces. It is insufficient and unrealistic to rely on private developers to include provision for large public spaces/parks in their developments that would satisfy this requirement. They need to be provided by government. **Figure 19 Principles of community facilities** This is found on the last page of the document and provides one of the very few references to 'Accessible and affordable housing' in the Design Framework. The Principles do not seem to have guided the Framework at all as there is no provision for accessible and affordable housing in this development as there should be (see above).
89	1) The proposal is appalling. 2) Northbourne Avenue is a major north south thoroughfare leading to and from Sydney - it is the extension of the Federal Highway. 3) People in the inner suburbs of Yarralumla, Deakin, Curtin, Hughes, Garran rely on Adelaide Avenue, Commonwealth Bridge, Northbourne Avenue to get to the inner north suburbs and also onto Sydney.

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	4) Deleting 1 traffic lane in each direction will make life hell for people on the Southside. There will be continual slow moving traffic jams, likely to have multiple traffic calming humps, pedestrian crossings so the likelihood is it will take 30 minutes to get to the outskirts of Canberra and onto Sydney. There is no alternative road north planned and the only alternatives will be rabbit runs through the suburbs - Anzac Parade, Limestone Avenue, Ainslie, Hackett, Watson - it won't be long before residents in these suburbs are demanding action to curtail this route to Sydney. Another alternative for Southsiders is via the Tuggeranong Parkway and GDE which adds 8kms to their journey. 5) Before even considering a Northbourne plan there should have been a traffic study of traffic across the Commonwealth Bridge and onto Northbourne Avenue and where the traffic was going. There should be a study of alternative routes for this traffic which does not involve rabbit runs through suburbs.I have lived in Canberra for the last 46yrs and for 30 of those years I lived on the Southside - Garran then Kambah and finally Gordon but all the kids lived on the Northside. Eventually I got so fed up with the lack of traffic planning for the south that I moved to Ainslie and now to Belconnen and consequently I won't be affected by the Northbourne disaster. In my 46yrs in Canberra it should have been known that the population would outgrow the 3 lane Commonwealth Bridge and 2 lane Kings Avenue Bridge. By now there should have been additional lanes on both bridges by cantilevering out the cycle and pedestrian paths as per a bridge in Auckland thus giving 4 lanes on Commonwealth Bridge and 3 lanes on Kings Bridge. 6) The Light Rail is not only a financial disaster, taking money away from Hospitals, Aged Care, Palliative Care, schools etc but it is archaic technology which will be superseded in a few years by electric self driving buses, capable of going on any route and making a fixed line rail a waste of time. 7) I have no faith in the planning process for Northbourne Avenue. We are already hearing of apartments that will get only 0-3hrs of sunshine in Winter - this should be illegal as a minimum amount of sunshine should be 3 - 5 hrs. Northbourne Avenue runs north-south, all the apartments should be rectangular running East-West and all apartments would then face north with no south facing apartments at all - a schoolchild could easily design them. The C/W Department of Energy and Resources (I think it was called that back in 1983) produced a booklet some 35yrs ago on "Energy Efficient Housing in Australia" with different designs for the various climates around Australia. Canberra is the best place to utilise the energy from the sun to warm houses and apartments (700watts/sqm in Winter). After 35yrs of knowing how to design energy efficient houses and apartments we are still building rubbish and giving them 5 stars even if they face South - what a joke. 8) Northbourne Avenue living areas should be designed along the Brisbane River development with integration of green space and properly orientated apartments. 9) It is a nonsense for Andrew Barr to say that Northbourne Avenue is no longer a major thoroughfare - for all Canberrans it forms part of the Federal Highway and as such it should kept as a reasonable free flowing thoroughfare not a throttled down pedestrian precinct. 10) This proposal will split Canberra into two halves - it won't affect people living on the Northside very much but will adversely affect those on the inner south suburbs to the extent that they will try and avoid it as much as possible. I'm surprised the National Capital Authority hasn't got a view on strangling access to the Parliamentary Triangle for important visitors arriving by road from Sydney. 11) I have no faith in any planning process under this ACT Government - it is all in the hands of developers
90	As a resident of [……..] Downer, we have reviewed the proposed "City and Gateway Draft Urban Design Framework" and having considered its direct impact to our street we write to express our objection to the Framework for the following chief reasons: 1. General lack of clarity regarding maximum building heights suggests a. Up to 18m for dwellings facing the Northbourne Avenue service road, and

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	b. Up to 12m for dwellings on the western side of Blacket St. 2. Lack of privacy when dwellings adjacent to our home have the potential to be up to four or five storeys high. 3. Inadequate access to natural light from increased overshadowing of adjacent developments. 4. Anticipated increase in vehicular traffic incompatible with the capacity and character of the Blacket St. environment. 5. Lack of detail regarding proposed uplift to Downer residential facilities (e.g. public open spaces, footpaths, cafes etc.) in proportion to the potentially significant increase in population. 6. Visually imbalanced medium density housing along eastern side of Northbourne Avenue Downer is in contrast to the Lyneham playing fields and Yowani Golf course west of Northbourne Avenue. We are fundamentally concerned that the proposed increases in urban density in the affected part of Downer will be detrimental to the character of this locality. We would strongly encourage the NCA and the ACT Government to take into account the views expressed by Downer residents in further developing a more broadly acceptable urban design framework for the Northbourne Avenue corridor into Civic.
91	I would like to fully endorse the proposed changes to the gateway into Canberra. Having been born and raised in Canberra I have an imence pride for our great city, two of my three children along with myself have represented the ACT in the sporting arena. My family has had several buisinesses throughout Canberra spanning some 50 years and it is very important to all of us to see our wonderfull city grow and indeed prosper into the future. The proposed changes to zoning regulations can only enhance this growth via greater opportunities for development which will encourage people to live and work in the precinct. Stage one of the light rail is rapidly approaching completion and such a wonderfull transport system will only flourish if the population along the route increases substantially. While I feel this is imperative, it is also important to keep the 'bush capital' mantra which your proposal does very well (via city and gateway draft urban design framework March 2018). The re-development of the precinct can only benefit the broader Canberra community, through increased revenue from associated taxes and charges. I for one am sick and tired of Canberra continually being branded a 'dull and uninteresting' hole of a place, and look forward with enthusiasm to a bright and prosperous future which this proposal can provide.
92	I would like to register my objection to the planned development particularly in Banfield street, I cannot see the need for multi story units in a small suburb. People choose to live in these quieter areas and the extra traffic is a concern.
93	Thank you for the opportunity to provide comments on the City and Gateway Draft Urban Design Framework. In providing these comments, we are also providing feedback on the revised proposal for the Downer area presented by [……..] at the Downer Community Hall (DCH) on Monday 9 April. As residents of Downer, our submission largely relates to the proposed changes and impacts on our suburb. However, we also provide some comments on the draft framework more broadly. We would like to register our appreciation for the respectful, courteous and conscientious approach taken by […..] and their colleagues in consulting on the draft framework. **Key point of our submission**

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	The most important point we make in our submission is that the proposed 12 metre/4-storey building height for the Downer northern precinct is too high and will have an unreasonable impact on the existing character and liveability of the suburb. We think townhouses are a better alternative that would mitigate these impacts. This option provide additional benefits – it would rejuvenate this part of the Northbourne corridor, support a modest increase in population density in this area, and provide a residential option for which there is high demand but limited supply. **Detailed comments on the proposal for the Downer northern precinct** The revised proposal presented at the DCH is a considerable improvement on the design contained in the draft framework, although we still have serious reservations. We agree its sensible to divide the Downer area into two precincts – a northern precinct where one block separates Banfield/Atherton Streets from Northbourne Avenue, and a southern precinct two blocks separate Atherton/Blacket Streets from Northbourne Avenue. Given the different depths available to new developments, it makes sense these two precincts be treated differently in terms of planning and zoning changes. The revised proposal is for the northern precinct to have a maximum 12 metre building height, which would allow apartment buildings of up to 4 stories. We think this is too high. This proposal should be revisited for the following reasons: • **A dramatic change to the existing streetscape.** This proposal would result in a substantially different building character on either side of the street – an apartment building with a vertical 'cliff-face' would front one side, while low-set houses set well back from the curb would front the other. This would be a sharp and unsuitably sudden transition in building height, and this would dramatically change the character and liveability of Banfield and Atherton Streets. This impact would be most significant where a gradient in the topography exists (like at the northern end of Banfield Street, where the land already drops down from Phillip Avenue). It is unreasonable to ask existing residents to support such a stark and dramatic change to the liveability of their streets and homes. • **Major impacts on local traffic, parking and vehicle access.** The revised proposal does not include a service road along Northbourne Avenue, as this could not be done while retaining the proposed informal park boulevard. We agree with this approach, as it would preserve green-space and align with the draft framework's vision for the transition of the Northbourne corridor. However, if 4-storey apartment buildings are built on Banfield and Atherton Streets without a service road, all car traffic would be forced onto those streets. We have serious reservations that these streets are able to absorb the traffic associated with such apartment buildings. It is likely to create hazards for cyclists and pedestrians, including young children and the elderly. As there are currently no footpaths on either side of Banfield Street, most cyclists and pedestrians use the road. Significantly increased traffic flow on a street with two blind corners would make this very dangerous. Even today, it is a challenge for garbage trucks or delivery vehicles to fit on these streets when cars are parked on the curb, and this would become even harder with more vehicles in the street. We note that Briggs and Banfield Streets are already used as all day parking spots by people catching the bus into civic. The introduction of light rail has the potential to increase this practice. As such, there may be increased on-street parking associated with light rail. Increased population density would further exacerbate this. • **'One-block deep' is too narrow for tall buildings.** Because the northern precinct is just one-block deep, any 4-storey apartment building would be necessarily tall and narrow. Ideally, a height transition would be applied so the new building smoothly integrates with the existing, predominantly one-storey streetscape, but this would be impractical given the one-block depth available. The narrow area available would also limit off-street

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	parking, resulting in a spillover of parked cars onto those streets. Finally, the northern precinct is mainly oriented with a northwest aspect, so tall skinny buildings running along these blocks are likely to overshadow houses opposite and impact solar access late in the day. These issues were discussed at length at the DCH meeting, and a number of alternative approaches were considered. In particular, [……] raised the option of townhouses, noting this type of low-cost housing is attractive to the elderly and young families. She described townhouses as 'the missing middle' between high and low density housing options, and noted they are highly sought after but in low supply. We support townhouses being considered further for the northern precinct of Downer. This option would rejuvenate this part of the Northbourne corridor, support a modest increase in population density in this area, and provide a residential option for which there is limited supply. Further, it would avoid an unreasonable impact on the existing character and liveability of Banfield and Atherton Streets. We make the following additional comments about the revised proposal for the northern precinct: • **Maximum building height** – Maximum building height should be 10 metres not 12 metres. We note the draft framework describes 12 metres as being consistent with a four storey building, while officials at the DCH meeting described it as being generally three-stories high. A maximum height of 10 metres would put this issue beyond doubt, while still allowing for some height increase along the Northbourne corridor. • **Marker building on south-east corner of Phillip and Northbourne Avenues** – We support the proposed marker building having been abandoned. • **Roof profiles** – Roof profiles should be tapered on both the Banfield/Atherton Street side (to allow a height transition) and on the Northbourne Avenue side (so the new buildings can take advantage of the northwest solar aspect). • **Consolidation** – If townhouses are pursued, we suggest that no less than 3 existing blocks and no more than 4 be consolidated. If apartment buildings are ultimately permitted, no more than 3 blocks should be consolidated to avoid overshadowing. To avoid poor visual impacts, provide privacy for residents, and allow pedestrian access to public transport on Northbourne Avenue, generous side-to-side spacing limits should be applied (e.g. 20 metres). • **On-site/underground parking** – We support the proposal that new developments provide adequate on-site or underground parking for residents and their guests. As noted above, we see practical challenges in doing this effectively on a site that is just one-block deep, which is why we argue for smaller buildings supporting a lower population density. • **Pedestrian access to Northbourne Avenue** – Permeable access for pedestrians and cyclists to Northbourne Avenue from Banfield and Atherton Streets should be a priority. At present, there is just one, unpaved access pathway in the northern precinct. Access to Northbourne Avenue would allow for greater utilization of light rail by Downer residents. • **Street trees** – Street trees are a unique part of Downer's heritage and a valuable link to the past. They should be preserved. • **Public housing** – We support the 'salt and peppering' approach of public housing throughout the Canberra community and believe that this should not be lost, particularly in Canberra's inner suburbs. A reasonable proportion of new developments should be set aside for public housing tenants.

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	• **Visual symmetry** – We have heard arguments there should be visual symmetry between the building types on each side of Northbourne Avenue, and that if major developments are planned for the Kamberra and Yowani sites on the western side of Northbourne, comparable buildings should also be allowed on the eastern side. We do not agree with these arguments. Adequate visual symmetry will be provided by the 30-40 metre width of the informal park boulevards. Further, the existence of Southwell Park on the western side of Northbourne Avenue will also mean symmetry cannot be achieved. It is unnecessary to impose inappropriately sized buildings behind park boulevards just to achieve additional visual symmetry. • **Greater space for bike storage at the Phillip Avenue Light Rail Stop –** We note the Phillip Avenue light rail stop will be the main access point for staff and students at the Australian Catholic University, as well as many Downer and Watson residents. To allow for greater utilization of light rail and promote active transport options, we suggest increased bike storage be included at the Phillip Avenue stop. **Other comments on draft framework** We offer the following additional comments on the draft framework more broadly: • **Downer southern precinct** – we think height limits are too high even under the revised proposal. We suggest 12 metres for buildings facing Northbourne Avenue and 10 metres for buildings facing Atherton and Blacket Streets. As outlined above for the northern precinct, we think lower building heights will permit a better transition to the existing Downer streetscape. A lower population density would also be consistent with Panton Street having been earmarked as a cycle- and pedestrian-friendly Active Transport Street (Map 13). • **Community infrastructure** – We are concerned the draft framework lays the groundwork for a dramatic increase in population density in Canberra's inner north, but makes little mention of the community infrastructure needed to accompany this. Omitting community infrastructure from the plan requires the community to make a 'leap of faith' that governments will examine this in the future. We think the ACT Government should explicitly integrate the greater demand for schools, childcare, health services, community support services and suburban parklands in its planning now. In this context, we note two areas in Downer and Watson are incorrectly identified as schools on Map 2 – the site on Frencham Street in Downer houses shops and a community hall, while the site at the corner of Windeyer Street and Phillip Avenue in Watson is the Canberra Technology Park. We are worried there is a lack of schools in our suburb now and that the nearby primary schools of Majura and North Ainslie are already at capacity. There is also no public high school in the Watson and Downer area. Lyneham High is similarly nearing capacity. This situation will be even worse if the area is asked to host a dramatically larger population in the future. Similarly, we consider the suburban parks across Canberra are tired and run-down relative to the facilities available in other cities. The draft framework proposes an increase in units and apartments without backyards, and this will inevitably increase demand for suburban parkland. Yet there are no plans to upgrade existing parks and no proposals to set aside additional parks. • **Cycling infrastructure** – We support the draft framework's focus on active transport, and welcome the proposed 'Garden City' cycle route. However, we have reservations about the proposed 'Active Travel Streets' – while the proposal to make local streets quieter and more cycle-friendly is attractive, we have recently seen vehicle access *increased* onto Panton Street in Downer (identified as an Active Travel Street on Map 13) through new access lanes from Northbourne Avenue. This is now a 'rat run' for motorists seeking fast access to Dickson, and cycling on this street is more dangerous. We think dedicated cycle lanes are the safest and most enduring solution for cyclists and pedestrians. We also note that many

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	streets in Downer do not have footpaths and, on those streets that do, the footpaths are in generally poor repair. Increased traffic flow will make street cycling more dangerous and so improved footpaths will be needed to promote greater uptake of active transport options. **Conclusion** • We are grateful for the opportunity to comment on the draft framework and look forward to the opportunity to provide further feedback on the future of the Northbourne corridor.
94	*Permission not granted to publish.*
95	I have read and considered the City and Gateway Draft Urban Design Framework (the Framework) and how it will impact on the suburb of Watson. It should be noted that Watson is one of the infill growth areas with approximately 604 additional dwellings currently approved for development in north Watson alone. It should not be neglected in forward thinking and planning for the future. COMMENTS AND RECOMMENDATIONS 1. The Framework boundary and planning should extend to the northernmost built up area in Watson, which is 'The Fair' residential complex on the roundabout on Antill Street and Northbourne Avenue. 2. As a result of this, planning for active travel routes needs to be extended to 'The Fair' and cater for all ongoing and future residential developments in north Watson. I see the key routes for active travel as being Antill Street (north) to the Australian Catholic University (ACU), the Stirling Avenue/Northbourne extension to Antill Street (north), a safe Phillip Avenue to ACU cycle/pedestrian corridor, and the Windeyer Street to north Watson via Majura Primary School connection. These are some of the main routes for active and safe travel for both cyclists, pedestrians, school students and children. Cycle paths and footpaths need to be provided on these routes, which will need to be prioritised and budgeted for in time. I fully support the people first priority list for active travel starting with pedestrians first and private vehicles last. Residents would also seek to have input on a Garden City Cycle Route which should flow through to the northern edge of Watson. 3. Residents of Watson need to be reassured that meaningful access to recreation for all Watson residents and especially residents of north Watson will be adequately provided. The general state of playgrounds and recreational facilities is largely inadequate and outdated in the older part of Watson. There are no public recreational facilities in north Watson at all. There are only pocket parks in Majura Rise and at The Fair in north Watson for local residents to use. 4. A Structure Plan for North Watson has been effective as of 19 December 2008. This will curtail the number of addition dwellings which can be accommodated on Future Urban Area (FUA) blocks in north Watson, three of which face Northbourne Avenue. Resulting from this there will have to be considerations on building footprints, setbacks and heights on the Northbourne Avenue corridor. The three FUA blocks on Northbourne Avenue are in the CZ6 Act government zone. The planning rule for CZ6 blocks currently specifies a two storey limit. The three blocks will be partially subject to Framework planning. 5. Residents of Watson are concerned about the future of the old Watson High School site. As the last large parcel of Community Facility Zoned land in Watson, planning for any redevelopment of the site will require more thorough and continuing consultation with Watson and more generally with north Canberra residents. GATEWAY PRECINCTS

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	A. APPROACH ROUTE I am generally pleased with the proposed landscape treatment of the two realms, the rural realm and the open parkland realm which extends from north Watson to Phillip Avenue. An informal landscape verge between the northern boundary of Watson extending almost to Phillip Avenue is supported. Detailed conditions on the Approach Route between Phillip Avenue and Antill Street (north) should clearly specify height limits. On Map 6 (p. 28) it would appear that the height limit is 8.5 meters which would be indicative of a two storey height limit. B. STATEGIC ROAD NETWORK I note with interest that the Antill Street (north) to Phillip Avenue roundabout is marked as a distributor. I am concerned about the future level of traffic utilising this route in future. Were it not for the relatively new set of traffic lights on the intersection of Phillip Avenue and Majura Avenue and the give way conditions at the roundabout, there would be more traffic utilising this rather (dangerous) road. There are three additional residential developments (604 dwellings) in north Watson and other developments in northern Gungahlin or NSW residents which will feed more traffic into Antill Street, although not necessarily in peak hours because of the current conditions. Ideally, Antill Street should be reclassified as a new transit corridor road which will require a substantial upgrade for vehicles, pedestrians and cyclists. C. DESTINATION PARK Some residents in Watson and north Canberra favour a destination park on the old Watson High School site, given that the nearest such space might well be as distant as Haig Park in the city. The space is ideally suited for destination park themes which will be vitally needed in our area as the populations of Watson, Downer and Dickson grow. Figure 1 – Structure Plan Map of north Watson showing FUA blocks fronting the Federal Highway (exerpt)

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4. Subdivision Design

The streets, off road movement systems, open spaces and utility services are to achieve a high level of design and amenity. Subdivision design shall seek to maximise housing diversity and energy efficiency.

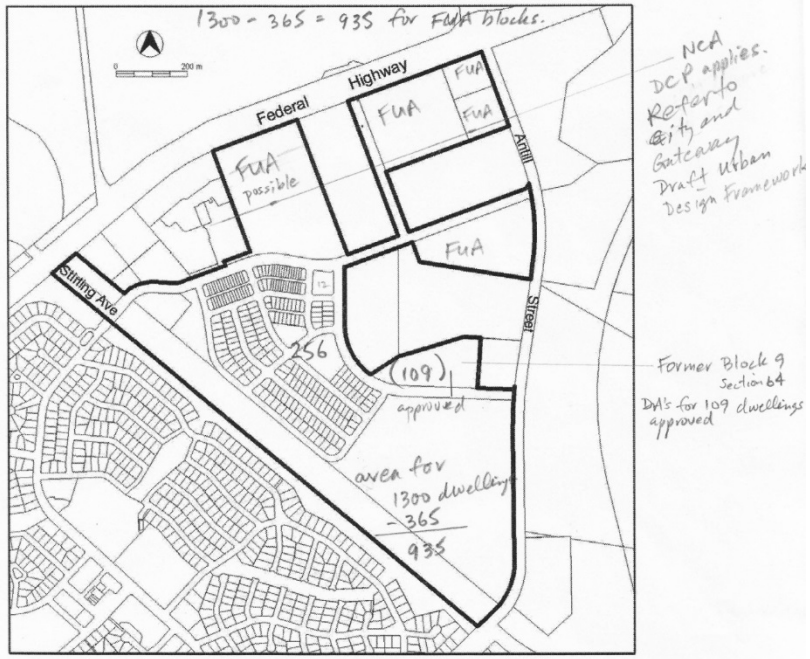
5. Building Height

Building height shall be two storeys. Where existing approved development exceeds a building height of two storeys, development compatible with the authorised height may be approved.

Figure 1

So-far Majura Rise 256 (built)
Block 9 original 109 (proposed, DA's approved)
365

1300 - 365 = 935 for FuA blocks.



NCA DCP applies. Refer to City and Gateway Draft Urban Design Framework

Former Block 9 Section 64
DA's for 109 dwellings approved

MAJURA RISE (256)

100	16	104	34		108	18
101	16	105	34 + 20 units.		109	16
102	24	106	22		110	18
103	31	107	park		111	11
					112	10

page 2 14.4 Structure Plan North Watson NI2008-27
Effective: 19 December 2008

Authorised by the ACT Parliamentary Counsel—also accessible at www.legislation.act.gov.au

20.8 Ha left 935 dwellings = 45 dwellings / hectare

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	DISCUSSION ON THE STRUCTURE PLAN FOR NORTH WATSON It is important to discuss the North Watson structure plan (2008) in context with the 2018 Draft Framework. There are four blocks of ACT government-classified Future Urban Area (FUA) land fronting Northbourne Avenue. By a process of reduction it has come to our attention that there are 935 dwelling left to be constructed on all of the FUA areas remaining in north Watson. This includes one block which is leased by owners of the Catotel tourist complex on Antill Street. At most this would allow an average limit of 45 dwellings per hectare of available land. It will be interesting to foresee if any of the building on ACT government unleased land will be developed to four to six storeys in height in future developments. I agree with a reduced 8.5 metre height limit for buildings fronting Northbourne Avenue in Watson.
96	I am appalled and disgusted, that yet again there are proposals and plans to further degrade the suburb of Downer and reduce the quality of life of its residents. The destruction of the area has already begun with the clearing of the park behind my block, planted mostly by us. Downer has always been neglected, it was left to us to plant and improve. Now, this strip of land behind Banfield St. is a construction site and depot. It is noisy, dusty and desolate, and it was put in place without re-zoning or consultation. We do not need blocks of flats with more traffic, noise an congestion. What we need and never had is infrastructure and amenities. Build footpaths, schools, shops and perhaps a library. Now, that would be progress.
97	We commend the ACT Government for working jointly with the NCA to create an agreed urban design framework (the Framework) that sets the principles for development and growth in the city centre and along the gateway corridor of the Northbourne Avenue corridor and Federal Highway. The Planning Institute of Australia (PIA) believes that there should be refinements and additions to the Framework outlined below and that in some areas it should be bolder in taking a 'people first' approach. Once refined we ask that the ACT Government look to act decisively to enact some of the these requirements into statutory controls given that the "horse has already bolted" with the development of light rail, public housing renewal and redevelopment of numerous sites along Northbourne Avenue outside any refreshed planning and design controls. We strongly encourage both the ACT Government and the NCA to consider implementing the Framework in a streamlined fashion as this will require changes to the planning provisions along the corridor. The dual planning controls of the National Capital Plan and Territory Plan require changes to ensure they are consistent in accordance with the Planning and Development Act. **Need for an integrated and coherent policy approach** There is a need to provide greater clarity on how the land release program and urban design framework will sit alongside the proposed sustainability strategy as well as the landscape master plan for Northbourne Avenue so that there is a coherent and integrated policy framework for the corridor. Great care will need to be taken to avoid inconsistency between these important initiatives. While there will be an increase in capacity to accommodate growth in the corridor a significant proportion of these sites are controlled by the private sector and it is unlikely that this capacity will be fully utilised in the medium term. It is important for the city that there is still a balanced release of sites on the

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	north and south side of the city so that the business case for future extensions of the light rail network is supported by the land release program, south side land releases and increases in capacity along the north south spine of metropolitan Canberra. **Canberra's metropolitan structure** Canberra's structure of town centres arranged in linear form connected by a public transport spine and framed by peripheral parkways is a robust structure for accommodating and consolidating growth along the spine. In line with international best practice the introduction of light rail should coincide with creating a more pedestrian orientated and civic transit spine. Light rail complements higher density and pedestrian oriented environments while providing for considerable increases in capacity for moving people. In tandem with the roll out of light rail, higher speed vehicular through traffic should be directed to the peripheral parkway network. **Northbourne Avenue as a multi-modal boulevard** The introduction of light rail is a game changer for Canberra. It reflects a global shift where public investment is moving away from highways and sprawl and into transit and cities. The role of design is shifting from building bigger roads to making streets that support quality places. Recent international publications such as the *NACTO, Global Street Design Guide* provides a best practice guide that is relevant to Canberra at this stage in its development. The guide is based on the principle that streets are public spaces for people as well as corridors for movement, marking a shift away from a functional classification of streets categorised only according to their ability to move traffic and provide vehicular access. Instead, it embraces an approach based on local context, the needs of multiple users, and larger social, economic, and environmental goals. Northbourne Avenue has multiple wide lanes for traffic integrated with buses, which dominate and divide the corridor. There is relatively little room for pedestrians and a lack of protection for bicycles. Northbourne Avenue can be transformed from a vehicular dominated space into a great urban space - a public space for people as well as corridor for movement and a safe, attractive and economically vibrant place. Currently Northbourne Avenue carries in the order of 3,500 people per hour in the AM peak. Light rail will in the short to medium term move 5,000 people per hour with the capacity to move in the order of 8-10,000 people per hour in the longer term. The introduction of light rail provides the opportunity to transform the corridor into a high quality multi-modal corridor with improved active travel choices, better amenity and balanced growth of jobs and housing. In the short term light rail will provide approximately a two and half fold increase in the capacity for moving people – supplanting the need for increased vehicular capacity along the corridor. This lays the foundation for the sustainable transformation of the corridor as Canberra grows over the coming decades.

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	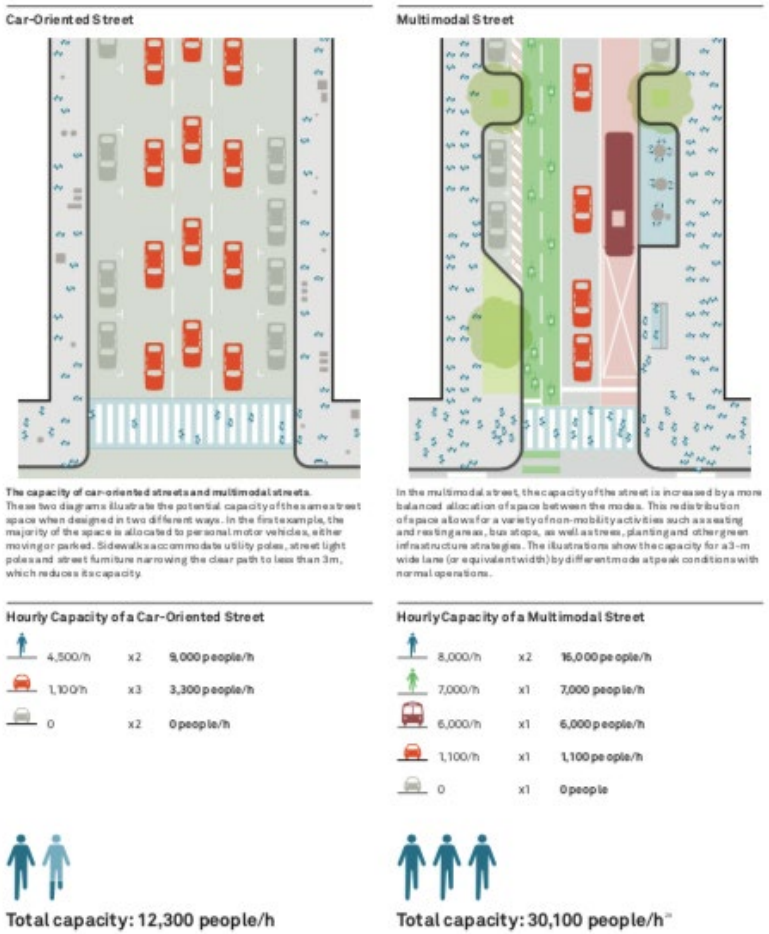 Car oriented vs Multi modal street (NACTO – Global Street Design Guide) As a multi-modal boulevard Northbourne Avenue should: • Serve more people; • Move more people; • Be accessible to more people; • Support more local business; and • Be more environmentally sustainable.

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	A bolder 'people first' approach is needed The removal of bus routes and stops along the avenue will have the effect of significantly increasing the capacity for vehicular traffic. This will potentially attract more cars into the corridor, which will in turn undermine the attractiveness and viability of light rail. From this perspective the approach taken in the City and Gateway Urban Design Framework should be bolder to support a people first approach to the corridor. Retaining 3 vehicular lanes in each direction (even in the short term) and not taking the opportunity to narrow the Northbourne Avenue median (even from 29m to 22m) and widen the verge is a major lost opportunity for sustainable transformation of the corridor. It retains the dominance of cars over other modes and results in a suboptimal verge width for pedestrians and protected cycle path, particularly south of Barry Drive. The retention of left turn slip lanes at key intersections will further reinforce this dominance to the detriment of pedestrians and cyclists. PIA believes that with the dramatic increase in capacity for moving people along the corridor with light rail represents the best time to introduce a slower speed environment with a reduced the number of vehicular lanes. The disruption caused by the current construction also makes it a better time to introduce change. This could be trialled by simple line marking to have immediate impact. Evidence demonstrates that cities can adjust to disruption quickly - the dismantling of motorways in Portland, San Francisco, Seoul, Vancouver and the closure of Swanston Street in Melbourne are compelling examples of this. In light of this PIA recommends the following cross section or similar (illustrated below), between Antill/Mouat Streets and London Circuit, be implemented when light rail services commence: • A cross section that provides for 2 lanes in both directions; • Vehicular set-down and bike and Vespa parking within bays separated by avenue planting (see example of Boulevarde Jourdan in Paris below); • A protected cycle lane in both directions; • Vehicular set-down lane converting to left hand turn lane at intersections (rather than left hand slip lanes)

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	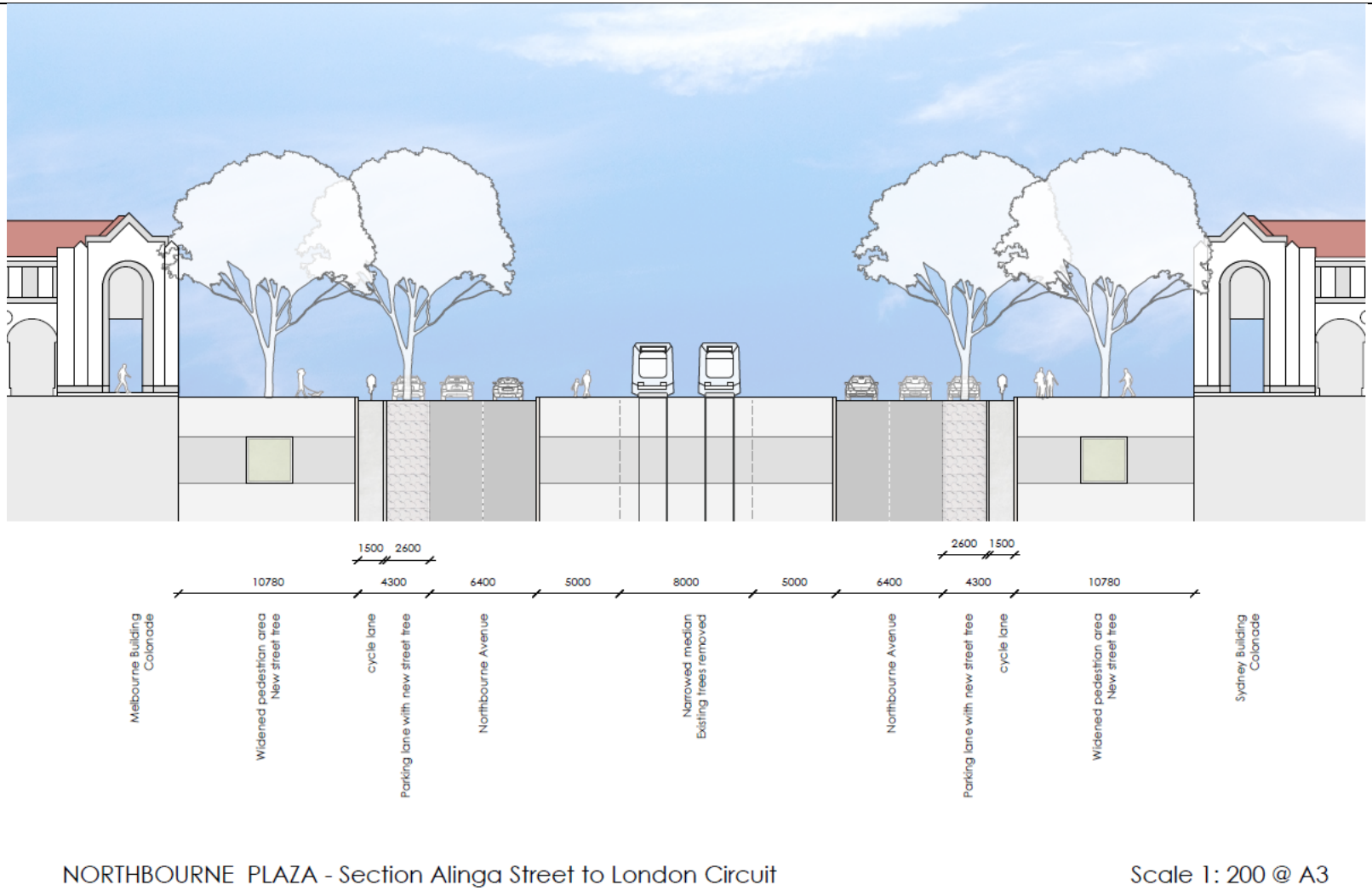 2 lane cross section with protected cycle lanes and vehicle set down – Northbourne Avenue from Antill Street to London Circuit (WBB – Northbourne Plaza concept)

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	 Boulevard Jourdan- Paris PIA is aware of recent work undertaken, referred to in a brief for the Northbourne Avenue Landscape Master Plan, which proposes the bicycle path to be lifted to verge level with left hand slip lanes impacting on the bike lane and the overall formality and geometric precision of the avenue. The recommended PIA cross section above proposes a solution where bicycle path is coincident with the vehicle lanes and a lane for set down converts to a turning lane at the intersection. **Vehicular access to properties** One of the major challenges for Northbourne Avenue occurs where properties rely solely on portes-cochere for access. PIA strongly supports the prohibition of portes-cochere but recognise that there is a need to provide for set down and access where alternative addresses are not available. The PIA recommended cross section above addresses the provision of street set-down to replace portes-cochere. The redevelopment of properties also provides the opportunity to consolidate driveways and to reduce the impact on pedestrians and cyclists of vehicular access to properties fronting the avenue, particularly when these properties only have access to Northbourne Avenue. Ground floor levels will also need to be stipulated to ensure that the verge and setback zones are reasonably contiguous with an integrated design that treated the verge and setback zone as a unified pedestrian domain.

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	There are good examples of portes-cochere being replaced by a single driveway and a vehicular set down that runs perpendicular to the avenue and behind the building setback. (e.g. Hyatt hotel in George Street, Sydney). Vehicle setdown – perpendicular to the street and behind the building line (Hyatt Hotel – George Street, Sydney) **Enhancement to Sullivans Creek and Haig Park** With the increase in density and the number of apartments within the corridor both Sullivans Creek and Haig Park will increasingly need to become the 'living room' of the corridor. These parkland areas are major metropolitan and inner north Canberra assets, the significance of which will increase dramatically over the coming decades. There needs to be a commensurate enhancement to these parklands and naturalisation of the drainage systems in tandem with the increase in density. Hypothecation of 'betterment' is justified due to the nexus between an increase in density, the demand for active and passive recreation and the proximity to these major open space assets. **Approach to the National Capital, set back and building height** While the strategic urban design intent of a progression from rural to urban and informality to formality is generally supported, there is a risk of an over formulaic and rigid approach that compromises diversity, climate responsiveness, urbanity and delight. We would prefer an approach that achieves the

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	general policy intent but in a less rigid way. PIA is not convinced that a fixation on a height in metres will deliver good climate responsive and diverse urbanism. An approach that works within the general policy intent but that also rewards design excellence, green design, diversity in building type and housing mix would be a preferred approach. For larger sites with broad frontage to the avenue perhaps an average height or number of storeys that allows heights to vary (e.g. from 4-10 or 12 storeys) would allow more climate responsive and diverse urbanism with more north facing apartments, green roof terraces, town houses and walk-up apartments with individual entrances and 'stoop' front gardens. It would also deliver distinctive silhouette rather than a rigid parapet height. A plot ratio and site coverage may be required but this should be tested before being adopted. Such an approach would require a more discretionary regulatory system supported by a design review panel. Where public benefit (e.g. provision of affordable housing or community facility or design excellence) is rewarded by an increase in floor space this should not be subject to an increase in Lease Variation Charge. PIA recommends that State Environmental Planning Policy (SEPP) 65 and the Apartment Design Guide be adapted and adopted for use along the corridor. It is a tested and coherent policy approach that has dramatically improved the quality of higher density apartment and mixed use developments in Sydney and throughout NSW. **Urban design guidance** The approach of specifying intent, establishing design criteria is supported. While saying this, there is a need to provide greater guidance with much greater use of diagrams to illustrate intent and criteria is required. SEPP 65 and the Apartment Design Guideline should be used as a potential model. **Strategic transport network** The network diagram is an important diagram. It is a bit enigmatic and would be stronger if it was drawn over the actual geometry of the street grid. PIA recommends the immediate development of the Garden City Cycle Route to complement the successful Sullivan's Creek Cycle Route to enable greater use of active travel. Further information on car parking provisions, such as maximum parking standards, which are instrumental in achieving mode shift to meet ACT Government ambitions to be Australia's walking and cycling capital and to have 7% of people cycling to work and 7% of people walking to work by 2026. More detailed information is required on how active travel streets running parallel to Northbourne Avenue will be protected as shared spaces with the potential increase of traffic movements on the streets running adjacent to Northbourne, due to increased residential populations and basement car parking ingress and egress at these sites. **Strategic walking network** PIA strongly supports initiatives to deliver a great walking city, the intent and design criteria are really important steps forward (pun intended). PIA would strongly support a 40kph maximum car speed for all streets in the corridor. Ideally a slowed Northbourne Avenue would have a maximum speed of 40 kph in the City and 50 kph north of Barry Drive.

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	Affordable housing There needs to be a specific policy aimed at ensuring affordable housing is retained in this corridor, due to the proximity to employment, public transport, facilities and services essential to low income and unemployed people. The Framework should reference this policy and include measures to provide for diverse housing types and affordable housing. **Mixed use** There need to be provisions which positively discriminate to ensure mixed use including offices, SOHO (Small Office Home Office), specialty and convenience retail, community facilities and cultural uses. Robust ground and first floors of buildings that provide for change of use over time is critical. **Environmental sustainability, green infrastructure and green grid/canopy cover** It is important that the Framework works with the proposed Sustainability Strategy and the Landscape Master Plan to provide support for green infrastructure i.e. Water Sensitive Urban Design (WSUD), distributed energy, waste systems, biophylic urbanism. Targets and KPIs should be developed which measure things such as energy use, canopy cover, microclimate and 'felt temperature', water use, water quality and air quality, noise levels as well as use of public space, footfall and active travel. **Other matters** Overall the high level ambitions articulate in the City & Gateway Draft Urban Design Framework are commendable, but need to be supported by enforceable controls that ensure these intentions are realised. PIA recommends that this approach be continued for stage 2 light rail corridor and ensure that all planning controls including urban design guidelines, zoning and plan amendments occur in a timely manner in advance of major transport infrastructure being installed to fully capture the benefits of urban renewal that it will instigate. PIA strongly support both levels of government adequately resourcing and prioritising initiatives such as this to ensure they are released in a timely manner in advance of major investment in infrastructure.
98	The [....] read and considered the City and Gateway Draft Urban Design Framework (the Framework) and how it will impact our suburb. We confine our comments to the section of the Framework affecting Watson. We welcome the opportunity to respond to the Framework, as we consider Watson is very much a part of the consideration of the Framework, because of: 1) **Its position.** • It is the Gateway into the National Capital - the first urban area that visitors who come via the Federal Highway experience - first impressions matter. • It is essentially the 'welcome mat'. • With a short extension, it will have a contiguous off road route from the north of Watson to Lake Burley Griffin; it has the Centenary walking and cycle route on its fringes; it has good facilities for horse riding. 2) **Its capacity.** Watson still has the capacity in both greenfield and present structure for new changes to enhance the concepts of firstly the "Approach Route",

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	then the "Informal Park Boulevard". It is in a perfect position to provide a range of services that people who have been travelling for some time value (orientation to the city and services, toilets, refreshments, playground for the car-bound children, 'Park and Ride' option etc), and the space for this development. **3) Its readiness.** The [....] completed a Community Survey in 2017, largely on planning and community assets as well as the Canberra Technology Park site (presently under government consideration). The information received from this indicates strong support for better active travel routes through the suburb from the northern urban area through to Downer, refurbishment of play areas, value of green spaces, better linkages within the suburb (south <-> north and within north), and also some extra commercial and community facilities particularly in north Watson. (Appendix 1 - Precis of Community Survey 2017). In fact, much of the Framework seeks to do just what the [….] has been seeking for our suburb with letters and meetings with the Planning department. (Appendix 2 - The Case for a Development Plan for Watson) To address the document, we would like to make the following points, based on the chapters in the Framework. **Executive Summary** The [….] supports the 4 major planning themes, as outlined. In particular, the accent on making places better for people, active travel, and sustainability. This should serve residents well, and make for an environment that is also a positive experience for Canberra's many visitors. The joint involvement of the ACT Government and NCA is seen as crucial to ensuring that both the internal workings of the city and the emphasis on development of Canberra as Australia's Capital are both serviced. **Introduction** **Purpose** The [….] certainly supports "....informs the development of an infrastructure plan to ensure broader urban renewal and community benefits are achieved ...." (P5). The WCA believes this planning is essential to creating positive community outcomes, and has been working to this end for our suburb. (Refer to Appendices 1 and 2) **Study Area** The [….] is concerned that although it is stated on P8: "The study area (Map 1) considered during this planning exercise includes the city centre and the linear corridor roughly 1km east and west of Northbourne Avenue (the city and gateway corridor), extending from Lake Burley Griffin to the Federal Highway up to the ACT border. The study area is characterised by a mix of residential, commercial, community and open spaces throughout the corridor." that on Maps 1 and 2, Watson is largely ignored, except for a part of the Garden City Cycle Route which peters out mid suburb, and on Map 3 it is ignored. It would appear that most of the emphasis of the Framework is on City (from Antill/Northbourne south) rather than Gateway. The [….] strongly supports the development of the Spatial Framework to extend to include the northern limits of the present urban development, north to Valour Park. The Spatial Framework includes 'Future Investigation areas' to the west of Federal Highway, but makes no reference to the eastern approaches of the city. The [….] believes transport (active and public) considerations should extend to the limits of urban developments to the city centre, taking into account not only the

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	residents of those areas but also the many commuters who enter Canberra along this route, as well as tourists and other visitors. The light rail station at Phillip Av will be the first opportunity for these people to connect to a Rapid route, but they need opportunities to reach the station without a car. **Urban Built Form** Agree with the intent but concerned that Watson is not considered in this section. We believe that: • Should apply to Watson within the boundaries stipulated in the Study area, and guide new developments for both visitors and residents • Should provide a showcase for Canberra urban development for visitors to the Capital of the nation • Residential capacity - A Structure Plan for North Watson was produced on 19 December 2008. This will curtail the number of addition dwellings which can be accommodated on Future Urban Area (FUA) blocks in north Watson, three of which face Northbourne Avenue. Resulting from this there will have to be considerations on building footprints, setbacks and heights on the Northbourne Avenue corridor. The three FUA blocks on Northbourne Avenue are zoned CZ6. The planning rule for CZ6 blocks currently specifies a two storey limit. The three blocks will be subject to Framework planning. By a process of deduction from the Structure Plan it appears that there are 935 dwelling left to be constructed on all of the FUA areas left in north Watson. This includes one block which is leased by owners of the Carotel tourist compound on Aspinall Street. At most this would allow an average limit of 45 dwellings per hectare of available land. We agree with a reduced 8.5 metre height limit for buildings fronting Northbourne Avenue in Watson. • Planning deficit. Households in Watson south of Stirling Av presently number around 1320. North of Stirling Av are around 1220 with around 600 more approved for construction here. A Neighbourhood Plan was prepared in 2004 for "A Sustainable Future for Watson" but it considered only south of Stirling Av, and no plan has guided urban development north Watson, nor does one exist now. Ignoring this in the Framework leaves the door open for an unsightly and dysfunctional section at the entrance to the City. • We note the passage in the Framework 'Over time, there will be privately leased sites that may be considered for rezoning for mixed use development to enable more diversity in land use' and see potential for Watson. **Approach to the National Capital** P20 of the Framework 'The objective is to heighten the traveller's first perception of approach and arrival in order to enhance recognition of the special symbolic and functional significance of the National Capital. These detailed conditions are concerned with achieving awareness of this special significance through the following: • marking the boundary of the ACT • establishing a clear and identifiable route from the border to the Central National Area, the symbolic centre of the city, by providing visual cues and strong structural links • building up expectations by progressively formalising the design character as travellers approach the Central National Area • enhancing views to recognisable and popular images of the National Capital so as to further build expectation and define the approach • ensuring that the structure, detailing and signage is consistent along each approach route into the National Capital' strongly indicates to us that Watson should be considered more seriously in the Framework.

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	Approach Route • More could be done with vegetation screening of existing built areas, as well as greenfield areas • Strongly support improving the feel of entry into the Bush Capital, and attempting to make Watson section of Approach Route more like that envisaged in the Framework • Consideration needs to be given to the area between Valour Park (previously known as Apex Park) and Stirling Av. to define how it fits with the rest of the Framework - is it Informal Park Boulevard or Approach Route or a mix? • Valour Park is lovely but could be improved for visitors and residents by a sound barrier to cut traffic noise - great outlook to bushland , and nicely landscaped but NOISY • Extending the excellent off-road cycle path along the Highway from Stirling to Antill St within a treed environment would create a transition to the Informal Park Boulevard • Strongly support retaining Kenny as defined in 'Approach Route'. • P21 has much of interest to Watson. Access limitations are supported. Equestrian trails are mentioned but not cycling and walking - the WCA would suggest these be included. The section on signage is supported. A lay-by is supported but consideration of a 'Park and Ride' (bus and bicycle) should be discussed. • Although the valued Justice Robert Hope Park is not adjoining the Federal Highway, it contributes to this bushland entry. **Informal Park Boulevard** • Watson from Stirling Av to Phillip Av is in this sector and we agree with a 8.5 metre height limit for buildings fronting Northbourne Avenue in Watson - some planning controls are urgently needed north of Stirling Av. • More screening effect and use of trees to create Boulevard feeling • **WCA** has concerns around the light rail station at Phillip. More than half of Watson residents have around 2km or more to travel to this (their closest station). Secure undercover bicycle parking is essential. Without improving cycle access to here from north Watson, residents there will be unlikely to use this option. It also appears that no provision for 'out-of-town' car travellers will be able to use this station (nowhere to leave a car or link to it with a bus). Street parking could easily become a problem. • Watson residents need convenient access to their closest Urban Village - Dickson. Improving active transport links, especially to and from north Watson, is strongly supported. **Access and Movement** • Crucial to Watson, both for residents who are largely on the outer limits of the light rail (especially north Watson), and visitors. • Maybe need a "Park and Ride" in Watson - ride a bus/light rail or ride a bike - both options need to be obvious and well signposted • Antill St and Phillip Avenues are significant concerns for extra vehicular traffic, including consequent lowering of safety for cycling. These streets are also seen by residents as being valuable on-road cycling routes (several responses in the Community Survey wanted safer cycling along Antill St). • Strongly support 'People First' approach

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	• Strongly support 'Garden City Cycle Route' but must extend north to Antill St (for residents and visitors); strongly support good connection into and through Downer and to Dickson Urban Village and the Sullivans Ck cycleway. We also note the Design Criteria for this route as stated in the Framework 'To maximise safety, the Garden City Cycle Route is proposed as a dedicated lane for cyclists, separated from vehicles and pedestrians' and agree. • Better signage for active travel routes • Paths (pedestrian and cycle) to the light rail station that are well signposted, and well lit at night • Good secure bike parking at Phillip St light rail stop, and also at Antill for 'Park and Ride' option. • Mid-block links are common and valued in the original planned area south of Stirling Av., but have been ignored in north Watson developments and we believe should not be permitted in new developments. Any capacity to change this in the approved, but as yet unbuilt, new developments should be pursued as a matter of urgency. • We note from the Framework 'A people-first approach will place more value on getting the best outcome for pedestrians, cyclists and public transport in this important urban renewal corridor. Light rail, integrated with the bus network, will provide frequent, reliable and high-amenity public transport. Improved walking and cycling connections for all ages and abilities will also increase options for sustainable movement along the corridor, especially for short trips', and agree it has application for Watson. **Better Places and Active Streets** • Watson is perfect for a Destination Park. The Community Survey had numerous mentions of rundown playgrounds, and poor local youth amenities. The redevelopment of Canberra Technology Park to an educational institution with accommodation would bring more needs of young people to the area near the shops, and have space for an outdoor park and gathering space. The Garden City Cycle Route would improve access to the Sullivans Ck community route. It would also fulfil a need for visitors with children entering Canberra from the north in cars to let them get out and play, while the adults also refresh themselves. Public toilets have long been on the 'wish list' for Watson. It is also close to the new school/group specific accommodation of Canberra Park. • Watson has limited open spaces for gathering/small events • Watson has some lovely green spaces and quiet streets but some need better safety, and some better paths eg the link from shops to north Watson to improve active travel which is heavily used but inadequate both in width and surface, non-contiguous, and unsigned. • Watson has a high proportion of people interested in active travel - the community survey showed close to 85% of respondents want good pedestrian/bicycle links. • We note from the Framework 'Place making principles help guide the design of inclusive, safe and inviting urban streets, public places and open spaces. City-shaping moves for a series of strategically important public places and open space corridors will create destinations and help bring these places to life', and agree it has application for the whole suburb of Watson. **Sustainable Communities and Urban Culture** Precinct development would be welcome, especially taking the whole of Watson as a precinct - community facilities falling behind population growth; adaptable and affordable housing poorly considered.

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	We note from the Framework 'Active living for improved health and wellbeing requires spaces that enable workers, residents and visitors to incorporate physical activity into their daily lives. Collaborative planning and delivery is required to enable facilities and services to adapt and expand to meet changing community needs. Urban renewal provides the opportunity to make efficient and attractive housing choices available to a broad cross-section of Canberrans regardless of age, household size or tenure. It will also help contribute to a zero emissions city that remains highly liveable in a changing climate', and agree. In conclusion, the [….] encourages the Framework to actively include Watson in its considerations - to ignore this area we believe will be counterproductive to the concept of the City and Gateway development, with first impressions of the National Capital potentially as messy and unwelcoming as presented by many other cities.
99	Thank-you for the opportunity to provide commentary in relation to the City and Gateway Draft Urban Design Framework (dated March 2018). We have been engaged to represent the interests of our client, HTI Group Pty Ltd, who owns a significant land holding within the Gateway Corridor. Together with our client, we have been anticipating the release of the Draft Urban Design Framework for some time and we wish to take this opportunity to provide comments in relation to specific matters of interest. By way of background, our client's site is Block 8 Section 58 Turner. It has an area of 6,354m² and has frontages to Northbourne Avenue (east), Macarthur Avenue (north) and David Street (west). HTI Group Pty Ltd purchased the site in 2014 and has since prepared a Master Plan for the staged re-development of the site - known as 'Midtown'. Implementation of the Midtown Master Plan will see the site transformed from a lifeless office precinct into a dynamic urban environment with a strong sense of community and connection to the adjoining light rail. We are partway through this implementation with the Mantra Hotel in operation and the Edgeworth mixed use development progressing in construction and due for completion later this year. The key corner re-development site remains vacant in anticipation of the City and Gateway Strategy being completed so as to implement its vision. An initiative in the establishment of Midtown is the desire to create a hotspot of activity and opportunity that is anchored by iconic and world-class architecture, intimate streetscapes, activated ground floor spaces and supporting commercial and residential uses. Midtown is intended to be targeted to vibrant uses such as small business entrepreneurs, start-ups, 'pop-ups' and similar uses nestled amongst larger and more established business enterprise – a model which will create an opportunity for business incubation and maturing in an active and supporting urban environment. The HTI Group is committed to this vision and commend the Strategy for sharing similar objectives for this site and precinct. Under the Draft Urban Design Framework, Midtown forms part of 'The Avenue' Gateway Precinct and a critical part of the Macarthur Urban Village Node. According to the Draft Framework, the development of the Urban Village Nodes is intended to provide markers in the urban landscape. These markers will identify thresholds in Canberra's urban form and help to provide intensity around selected light rail stops. On this basis, the Draft Framework proposes increased building heights within the proposed Urban Development Nodes. With regard to the Macarthur Urban Village Node (of which our client's site is a key component of), the Design Framework provides for the height of one building at each street corner (i.e. at all four (4) corners of the Northbourne Avenue / Macarthur Avenue / Wakefield Avenue intersection) to be up to a

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	maximum of RL617 (44-48m). Minimum building heights are required to be no less than 80% of the maximum height prescribed, unless approved by the National Capital Authority. In addition to the proposed increased heights, the Draft Framework proposes specific design criteria for building separation for face-to-face development, side-to-side development and face-to-side development We note that the minimum required separation is directly related to the height of the building (number of storeys) with larger separations prescribed for up to 8 storeys and 9+ storeys. In relation to the minimum front setbacks to Northbourne Avenue and the intersecting streets (i.e. Macarthur Avenue and Wakefield Avenue), the current 10m minimum requirement is proposed to be retained. Whilst we support the Draft Framework's intent in relation to the proposed changes to building heights, we have some concern in relation to and do not support the retention of strict, numerical-based rules for building setbacks and separation at the Urban Village Nodes. We contest that such controls will result in large isolated buildings that are disconnected from the surrounding urban environment and of which, have large and under-utilised landscaped spaces. This outcome will lose the design intimacy that is key to creating the urban precinct vision of the Midtown development and what is needed to establish a successful Urban Village Node. Our Client's Midtown precinct has been deliberately designed and set out in subdivision to provide for and create a laneway streetscape character in which the ground plane is largely liberated from service requirements and given back to public realm function, use and activity. This character relies on building bulk and scale that creates the semi-enclosed spaces that will form the 'laneway' backdrop and character sought to realise the use vison for the precinct. The Midtown Master Plan Stages 1 and 2 (Mantra and Edgeworth developments) are either complete or are nearing completion and the subdivision set and registered to create the title background in which the remainder of the precinct will be delivered. Stage 3, with direct frontages to Macarthur Avenue and Northbourne Avenue is currently un-developed and vacant and was deliberately delayed so as to capture the opportunity to implement the urban node and village concept discussed earlier in the City and Gateway Strategy discussions. In applying the proposed minimum building height, boundary setbacks and building separation controls to the Stage 3 area, the development of a landmark building with integrated urban plaza will be almost impossible to achieve and the design character for the midtown precinct as intended in the early precinct development, will not be achieved. In the context of the proposed controls a smaller scale building would be permissible, which would not deliver the urban laneway character that is intended and set-out and supported in the subdivision of the original site and ultimately will be a missed opportunity in the Macarthur Urban Village Node. The intention is to establish Midtown as a distinct, urban destination and precinct at the Macarthur Urban Village and rail stop. This will not be achieved should the prescriptive controls of the Draft City and Gateway Strategy be adopted. Noting the above, we believe that a targeted set of objectives, together with performance-based planning controls and standards should be adopted so as to encourage developers to provide more innovative design, which integrates principles of sustainability with world-class architecture – this is especially critical at the Urban Village Nodes where a denser and thriving urban node is to be the policy deliverable. True innovative and landmark building precincts will create the visual prominence sought for the Urban Village Nodes along the corridor and this should be encouraged without dictating specific numerical planning controls. This approach would be consistent with the Chief Planner's recently publicised view that planning in the ACT should become more outcomes focussed, as opposed to rules-based to provide room for innovation in design and merit based delivery of built outcomes.

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	We believe that a design review panel is key to realising this outcome and suggest that the involvement of this entity with guidance from the City Renewal Agency will provide a consistent approach to reviewing the design quality of marker buildings and precincts proposed to be constructed within the Urban Village Nodes. This process could occur prior to the lodgement of a Development Application and as part of the Pre-DA consultation process.
100	**Executive Summary** The Green Institute is supportive of the broad sweep of the City and Gateway Draft Framework. The basis of the plan, tying together urban form with access and movement, better places and active streets, and sustainable communities and urban cultures, is a positive vision for the city. Furthermore, the design elements are a bold mix of sensitive urban infill and public open space. However, the Institute would add three specific and important caveats on the Draft Framework to improve it: 1. In line with both the recognition of Canberra's special place as our nation's capital, as well as the overwhelming response to the 2017 public inquiry into billboard advertising, the Institute calls on the Planning Directorate and National Capital Authority to explicitly prohibit the use of outdoor advertising, including on public transport shelters, throughout the City and Gateway. 2. While the design features around access and active streets are very positive, the Institute would like to see explicit rejection of "hostile design" elements across the city. The Framework is notably silent on who is expected to deliver the proposed development along the corridor, leaving the expectation that it is to be done by commercial developers for commercial interests. The Institute calls for a substantial proportion of the corridor space (perhaps 50%) to be set aside for community development, led by and for the community. **1. Prohibiting outdoor advertising within the City and Gateway** 1(a). Canberra as our national capital Central to the City and Gateway Draft Framework is an understanding of "the role of the Territory as the setting of the National Capital and Seat of Government of the Commonwealth".[1] This understanding also underpins the historical restrictions on advertising in public space across the city. Canberra is a city of government, public service, tertiary education, and national cultural institutions. It is a city whose citizens are proud of its place in our nation, a city which represents the public interest. It is a city which hosts politicians, public servants, lobbyists, visiting school students, tourists and more. For all these people, a public space in the public interest is of vital importance. Advertising hands public space to private interests, enclosing the commons. It sends a clear and unambiguous message to all who view it that the space is no longer theirs, that it now belongs to a private company to profit from. It embeds the social and cultural primacy of private profit over public interest into

[1] ACT Planning and Land Authority, *Signs General Code*, March 2008, 2.1 (d), http://www.legislation.act.gov.au/ni/2008-27/copy/56699/pdf/2008-27.pdf

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	our lived environment. This is damaging for all cities and all public space, but it has no place at all in Canberra, where public space is representative of the city's public role in our nation. Advertising makes us unhappy and restless; it drives materialism, which is linked to higher rates of depression, interpersonal violence and antisocial behaviour; and it erodes pro-social and pro-environmental values necessary for the maintenance of a flourishing city.[2] As such, public space advertising runs clearly counter to the vision of Canberra's City and Gateway presented in the Draft Framework. It should be explicitly prohibited in the final plan. 1(b). Advertising is deeply unpopular in Canberra In 2017, the ACT Legislative Assembly Planning Committee held a public inquiry into the regulation of billboards in Canberra, following suggestions by Chief Minister Andrew Barr that existing regulations should be updated. The response to this inquiry was massive and unprecedented – no previous inquiry received as many submissions, nor such a disproportionately negative reaction. Of the 162 submissions, 155 were opposed to any relaxation of the restrictions on public space advertising, with many calling for restrictions to be tightened. Only four public submissions were supportive of relaxing the restrictions. Following the Committee casting doubt on how representative of broad community views the submissions were, the Green Institute commissioned a poll via Lonergan Research in early 2018. The results of this poll back up the clear message that advertising in public space is deeply unpopular in Canberra. 69% of Canberrans agree or strongly agree that "advertising reduces the quality of public spaces"; 78% agree or strongly agree that "the advertising free environment of Canberra makes it more pleasant to live in than other bigger cities"; and fully 90% believe that the government should decrease (48%) or keep the same (42%) the amount of public space available for advertising. Full details of the poll can be found on our website.[3] In the context of the very clear expression of public opposition, as well as the vital role of Canberra as our national capital, there is a clear mandate for the City and Gateway Framework to explicitly prohibit outdoor advertising throughout the area. While not necessarily prohibiting reasonably sized hoardings and signs on buildings, this should certainly cover any billboard advertising and any bus or light rail shelters along the corridor. **2. "Hostile design"** The Draft Framework's focus on access, better places, and "safe and inviting urban streets" is very welcome. The commitment to make the city "more inviting for people to visit, linger and interact" sends a very positive message. However, there is a long and unfortunate history of visioning documents expressing similar positive goals, but implementation ending up designing space which leads to purely commercial use. Architecture can be used to drive people into shopping centres, for example, and to discourage use by less 'desirable' people, such as homeless people or young people.

[2] A detail exploration of these issues can be found at https://greenagenda.org.au/2016/09/confronting-advertising-the-elephant-in-the-bus-shelter/

[3] https://www.greeninstitute.org.au/keeping-canberra-ad-free/

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	In particular, there is increasing acknowledgement and critique of what has become known as "hostile design" or "hostile architecture".[4] This kind of design, subtly or blatantly, excludes use of public space in certain ways, generally preventing its use by homeless people, or focussing its use on purely commercial, transactional purposes, rather than communal purposes. The Green Institute believes that the Draft Framework intends to encourage inclusive, communal design. Such an intention would be backed up by a clear statement in the final plan rejecting the use of hostile design. **3. Community vs commercial development** The fulfilment of the vision for the Northbourne Avenue gateway will involve substantial new development along most of its length. While design aspects have been well thought through in the Draft Framework, it is conspicuously silent on the question of who is expected to lead and undertake this development. In the current political context, this leads to an expectation that the development will be led by commercial developers for commercial purposes. This is neither the only possible, nor the most desirable, outcome. As arterial and mid-rise development in many cities around Australia and the world has shown, leaving the planning of such development to commercial developers often leads to sub-optimal or negative results. Commercial developers are, of course, legally required to focus on maximising their profits, not on providing what the community wants. This generally means small apartments, each with private facilities such as laundries, which can be cheaply built in large numbers and sold for high returns. This, in turn, drives changes to the community, led by commercial interests rather than actual community desires. An alternative approach would give the community the opportunity to proactively lead development. Community members and groups could themselves bring forward proposals for development which involves a mix of residential, community and commercial use, but which meets their desires and needs, rather than being focussed on maximising profits for commercial developers. This might, for example, involve a combination of small, medium and large dwellings; shared facilities; co-housing; and encouragement of a range of different demographic groups (eg young families living close to older people). This type of mixed-use development is highly unlikely to be proposed by commercial developers, but highly likely to be proposed by the community. And, having been led by the community, it is highly likely to be popular and well-used over the longer term. Such community-led development fits perfectly with the inclusive vision set out in the City and Gateway Draft Framework. However, it will not happen in the absence of clear and direct encouragement and support by government in plans such as this. **Conclusion** The Green Institute broadly supports the City and Gateway Draft Urban Renewal Framework, with three important caveats: 1. Public space advertising, including billboards and public transport shelter ads, should be explicitly prohibited across the City and Gateway area; 2. "Hostile design", excluding use of public space by homeless people, young people and others, should be explicitly rejected in the plan; and 3. 50% of the development space along the corridor should be reserved for development led by and for the community, rather than commercial development, with institutional support to community members and groups to prepare and propose such development.

[4] See, for example, http://www.abc.net.au/news/2018-03-02/design-crimes-how-hostile-architecture-is-hurting-our-cities/9498912

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	The Green Institute recommends that the final plan set aside a substantial proportion – perhaps 50% – of the corridor for community-led development. In addition, the Government should provide institutional and financial support to community members and groups to put together and propose their developments.
101	Thank you for the opportunity to comment on the aforementioned document. I am a leaseholder and occupier of [……] Downer, which adjoins the Northbourne Avenue verge and is located within [….] of the junction with Phillip Avenue (being the approximate location of a future light rail stop). I purchased this property because of the excellent accessibility it provides by virtue of its proximity to the Northbourne Avenue transport corridor. I am under no illusions that inner north suburbs, including Downer, must densify to deliver sustainability outcomes. I am strongly of the opinion that Downer is well placed to do so by reason of its position within the metropolitan structure and transport infrastructure, and can do so subject to the delivery of appropriate social infrastructure. I am extremely cognisant of the potential that my block, and others within proximity of Northbourne Avenue, can offer in terms of greater housing density. I support the proposals of the draft Urban Design Framework as they apply to Banfield Street. However I caution the following:- - This part of Downer is a typical RZ1 area. While greater scale is appropriate to Northbourne Avenue (presumably necessitating zone changes), appropriate transitions of scale to the rest of Downer will need to be considered and built into any future precinct code. - Ongoing maintenance of the verge to Northbourne Avenue should be secured to provide a high level of residential amenity to future residents. - Consideration should be given to policy levers (including LVC remissions) that will incentivise development in a timely fashion. - Consideration could be given to mechanisms that encourage site consolidation, thereby delivering more efficient redevelopment sites. However these must be flexible. Several leaseholders in this area have already redeveloped their sites, which now accommodate large modern homes effectively locking these sites up for a further 15+ years. Development potential within the locality should not be hindered by the decisions of a limited number of leaseholders. I note a recent flyer distributed by the Downer Community Association. This includes headers which read 'Tell the ACT Government your not happy' and 'Numbers matter'. As a professional planner I support an evidence based approach to planning and am confident that the ACT Government/NCA will not allow loud voices to trump the genuine long term needs of the broader community. I also take issue with the ongoing preoccupation with height metrics, rather than more nuanced consideration of design and scale and the impacts of these. In addition, the DCA suggests that it is an 'unfair and disproportionate distribution on Downer residents'. Not only does this misinterpret the housing yield statement, but ignores the very characteristics of Downer within the metropolitan structure that make it an ideal location for further intensification. I am heartened that this document has finally been released and look forward to seeing its evolution.
102	We are writing to register our deep concern at the proposed increase in height restrictions on properties which we understand would allow for up to 5 to 6 storey buildings on Northbourne Avenue and Swinden Street, and up to 3 to 4 storey buildings on streets including Atherton, Blackett and Banfield. We live in [……] which would be affected by such radical changes in height restriction. Having examined the draft Framework, we cannot understand how such building heights could be said "to respond to the Canberra's landscape qualities..." (p29). It is also clear that this would not deliver what is described as "a symmetrical built edge to both sides of the corridor."

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	Downer is not an inner city suburb with the facilities to support such an increase in new dwellings. Our streets are narrow and such high buildings would worsen the narrow streetscape. Clearly such radical height increases would very significantly decrease the access to natural light in the streets where this would occur, and would greatly reduce the efficiency of solar panels established on neighbouring buildings. We have only just been alerted to this very significant change to the community of Downer, and believe that many Downer residents would not be aware that this is being proposed by the ACT Government, without any proper consultation to gauge the reactions of the community. Has the ACT Government consulted the tenants in the public housing dwellings as to any implications for them? We are very disappointed that such a major change to the Downer community would be presented in this Framework, without any discussion of what it would mean for our suburb. We look forward to hearing that the Government will consult fully on this Framework and the implications for our community in Downer.
103	I wish to raise both concern and support for the CityGateway initiative. My concern is in regard to the building heights proposed along the corridor of 6-7 stories (18m), in particular along the Watson/Downer stretches where the propsed creation of a wider infornal boulevarde will push those heights further back into existing low rise residences. I believe this contradicts some of the principles stated in maintaining an informal boulevarde and equilibrium of bush capital and city vibrancy and would adversely impact many established residences along this stretch. I would happily support a compromise where height restrictions were increased to allow 3-4 stories, for example - 4 at intersections, 3 along this informal boulevarde, recognising the need for medium density development as the city grows. This would more aptly fit the concept of the informal boulevarde with medium density, blending into the existing low density suburban areas. I generally support the principles contained within the gateway design, including the establishment of urban villages, but do not support the proposed height restrictions along the informal boulevarde as they currently stand. There is significant space between Antill St and the city for medium - high density living and medium rise building without overly impacting existing residences along the informal boulevarde. Whilst Canberra must grow as a city, there is space for reasonable compromise.
104	I recently met staff from ACTPLA on the information tour at Lyneham shops. I am of the opinion that Owen Cres should be upgraded from the RZ4 rating to a higher rating for the following reasons: 1. North Canberra is the gateway to Canberra. First impressions count. At present it looks like a country town as you enter the CAPITAL of Australia. Two and three level unit complexes won't change that image much. Lets go for a big city look especially as Owen Cres is 1 street back from Northbourne Ave, and part of Owen Cres is actually visible from on Northbourne Ave. Why differentiate between the part east of De Bourgh and the part west of De Bourgh? 2. Macarthur Av area is going to be a major train stop with an upgraded precinct. Lets make the area buzz not do things half heartedly. 3. I currently rent out [….]. I used to live there a couple of years ago. Recently I went to the green reservoir area behind Owen Cres. It's still underutilized. Why spend all that money on the park set up and maintenance but have it under utilised. I believe the area would be buzz even more if there were taller developments with more people going to the park to play and relax. Look at Central Park in New York. Beautiful Place!!! Currently hardly anyone uses park. Bring it to life!!! Better use of the green area. 4. If more people live near light rail. More people will use it making it more profitable! as well as buses etc.

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	5. Higher Developments means higher revenue for government lowering pressure on coffers and lowering pressure on raising other taxes. I believe ACTPLA should be bold especially in the Northbourne Corridor. I believe the future should be embraced not be scared of.
105	Gas Energy Australia (GEA) is pleased to respond to the National Capital Authority and ACT Government consultation – City and Gateway DRAFT Urban Design Framework March 2018 and highlight GEA members' concerns it could increase the risk of safety incidents and increase costs for households and businesses. GEA is the national peak body which represents the bulk of the downstream gaseous fuels industry which covers Liquefied Petroleum Gas (LPG), Liquefied Natural Gas (LNG) and Compressed Natural Gas (CNG). The industry comprises major companies and small to medium businesses in the gaseous fuels supply chain; refiners, fuel marketers, equipment manufacturers, LPG vehicle converters, consultants and other providers of services to the industry, including fuel transporters. GEA seeks to ensure main transport corridors are kept open to all logistics vehicles, including those carrying gaseous fuels, to reduce the likelihood of safety incidents and contain costs for Australian households and businesses. In particular, GEA is concerned about Figure 10 of the Framework "redefining Northbourne Avenue as a transit corridor" and the user hierarchy placing pedestrian, cyclists and public transport above commercial vehicles. While such a change might reduce the number of logistics vehicles travelling along Northbourne Avenue, restricting commercial vehicles' access to this main transport corridor would create the following unintended negative effects. • Reduced access forces large commercial vehicles to undertake alternate routes, making these vehicles traverse streets which they are not designed for. It may even direct traffic flows through residential areas where private vehicle driveway and pedestrian access pose increased safety risks. Included as an attachment is an example where restricting the access of vehicles carrying dangerous goods to the Tugun Tunnel and requiring them to use a bypass route exposes the Gold Coast community to greater risks. • Reduced roads access requires smaller delivery vehicles which drive up unit costs for delivery and service. Ironically, this would jeopardise the planned densification of the study area by not affording a high priority to the logistics support required to ensure liveability and affordability for intended residents. • Canberra's gateway is already used by gaseous and liquid fuels to service businesses in the Northbourne Avenue corridor and Civic in accordance with the Australian Code for the Transport of Dangerous Goods by Road & Rail. The gateway also acts as a corridor for deliveries in the greater ACT and southern NSW region and restricting the corridor would negatively affect consumers not just in the ACT but more broadly in surrounding regions. • Changing access arrangement will require further consultation with industry to ensure that any alternate transport routes particularly those for dangerous goods maintain the current high standard of safe and efficient transport and delivery that Northbourne Avenue currently provides. GEA welcomes the opportunity to further discuss this submission in relation to maintaining access to main transport corridors for logistics transport, including gaseous fuels. We also look forward to the NCA and the ACT Government taking actions that recognise the broader impacts of planning decisions, including the safety of those living and working away from main traffic corridors, and the role efficient and effective freight and logistics transport plays in supporting community living standards.

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106	The ACT Climate Change Council is a legislative body charged with advising the ACT Minister for Climate Change and Sustainability on matters related to reducing greenhouse gas emissions and addressing, and adapting to, climate change. In particular in exercising its functions, the Council must (see establishing Act): • provide information to private entities to encourage entities to take action to address, or adapt to, climate change; • consider the social, economic and environmental impact of issues relating to climate change, and national and international practices or developments in climate change. For these reasons, we are particularly interested in the proposed City and Gateway Urban Design Framework, a major and enduring change to Canberra's urban landscape, with consequences for both greenhouse gas emissions that will affect future climate change and adaptation to climate change that is already underway. As background, the ACT has established itself as a world leader in monitoring and reducing greenhouse gases, with the legislated targets: 100% renewable electricity by 2020; 40% reduction in greenhouse gas emissions on 1990 levels by 2020; zero net emissions by 2050 per person. Greenhouse gas emissions are to peak by 2013, then decline, and the ACT is on track to, or has already met, these targets. The ACT Government has also released a discussion paper seeking comment from the community to pull forward its date for zero net emissions in the ACT, and proposed interim emissions reduction targets for 2025, 2030 and 2040 to guide that transition. It is in this context that the ACT Climate Council provides the following comments on the City and Gateway Draft Urban Design Framework. **Comments on "City and Gateway Draft Urban Design Framework"** Overall, the ACT Climate Council considers the City and Gateway Draft Urban Design Framework (Draft Framework) to be an impressive and visionary document for the future of the Northbourne Corridor. If the framework can be delivered, this will be a huge improvement over the current condition of the corridor. The Draft Framework, however, under-emphasizes the sustainability opportunities that the redevelopment of the corridor offers. There are some good comments and suggestions regarding sustainability but they are vastly underplayed compared to other aspects of the re-development and sometimes appear to occur as an afterthought rather than a core feature of the redevelopment. Given that Canberra has achieved a global reputation for strong, effective action on climate change (deservedly so) – e.g. meeting its 100% renewable energy target by 2020 – it is disappointing to see relatively little emphasis on climate change-related aspects of the Northbourne Corridor re-development. There are obviously many aspects of the design and delivery of the re-development that relate to climate change. It is very important that the next version of the Draft Framework emphasizes five important climate change-related aspects: 1) **Net-zero emission buildings and precincts** Canberra's electricity supply will be 100% renewable in the very near future. The focus is now on decarbonisation, including transport, built infrastructure and waste. There is already research and plans for delivery of net-zero emissions precincts in Canberra (forthcoming ACT Climate Change Council report 2018). There are already net-zero emissions buildings in Canberra (e.g., the Frank Fenner Building at ANU), delivered on budget and on time. The Northbourne Corridor re-development offers the perfect opportunity to scale up the excellent work already done on net zero built infrastructure. Achieving net-zero buildings – or as close to it as possible – would be an excellent way to strengthen even further

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	Canberra's leadership on climate change action. It could also place the developers in a strong position to become leaders in sustainable, net-zero high density dwellings, the demand for which will no doubt grow strongly in the near future. **2) Urban heat-island effect** The ACT Government has already done some research on the Urban Heat-Island effect, and there needs to be a high-profile adaptation approach for re-development around Canberra that considerably reduces this effect. Again, the Northbourne Corridor provides an excellent opportunity to demonstrate cutting-edge action on combating heat islands through smart, forward-looking design. The good news is that many of the actions needed to deliver on the reducing the urban heat island effect are already in the Draft Framework. For example, "public realm", "open space" and "shade trees" all, in various ways, can effectively mitigate the urban heat island effect through appropriate design. However, these comments are scattered throughout the document and never brought together coherently in one place to emphasise what could be achieved – and in fact, is already close to being achieved in the present framework. These climate change-related aspects are often – and appropriately – considered as part of the broader sustainability challenge. In that regard, the Sustainability section at the very end (p. 63) is considered inadequate. Throughout the document there are many good design features that contribute to sustainability so the very short Sustainability section at the end does not do justice to what is already in the document and what can be achieved on the ground. A good solution to this is to put an overarching Sustainability section up front (2-3 pages only), and then refer back to it at appropriate points in the more detailed sections of the document. This is not a huge change but could have a big impact on the "feel" of the document in terms of recognising and dealing with the biggest challenges of the 21st century. In addition to these two central themes, the Council would also like to note the following comments in its submission. **3) An integrated approach to action on climate change** A consistent key message from the Intergovernmental Panel on Climate Change is that early action and incorporation of climate responses will be much more cost effective that the inevitable retrofitting along the corridor as the impacts of climate change begin to impact buildings, infrastructure, landscape and importantly communities. The development of the 'corridor' provides a unique opportunity to showcase leading practice in implementing an integrated approach to action on climate change in both the natural and built environments. Consideration needs to be given to both the immediate and the longer-term in relation infrastructure and design, for example flood proofing, mitigating heat related stress and incorporating living infrastructure. Attached are some national guidelines for Climate Ready Cities prepared by Professor Norman and released by the Australian Government December 2016. A number of key principles are outlined for consideration when undertaking urban development. **4) Capacity building in the industry** Much of the above relies on the ACT building and construction industry having a solid understanding on the projected impacts of climate change and therefore the imperative to incorporate both mitigation and adaptations actions when implementing policy solutions on the ground. The Council is very willing to work with industry in the form of workshops, briefings to provide the key information on the science and to discuss leading practice in climate-adapted cities both within Australia and overseas. Positive initial discussions have been held with leaders of the Business Council and the Trade Unions regarding the benefit of climate briefings, and the Council stands ready to build and expand upon that beginning. **5) Some specific comments**

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	p24. Here we read the statement: “Encourage sustainability as a base requirement for all new buildings”. Shouldn’t we be doing more than ‘encouraging’? Wouldn’t it be more appropriate to say “Sustainability is a base requirement for all new buildings.”? Of course specifics about sustainability would need to be worked out with developers, but at least the fundamental principle would be expressed here. p27. We read: “Support sustainable building performance….” Again, the Council feels a stronger statement is appropriate. p. 34. “Heat islands” are mentioned here but lacking is a connection back to the importance of good design of the public realm and the surrounds of buildings – and indeed the design of each and every building – to address this problem.
107	I wish to register my feedback in regards the proposed City and Gatewat Draft Urban Design Framework, as porposed by the ACT government. My greatest concern is to do with the proposed height limit increases put forward in the plan. I believe that the issue of building height, and the knock on consequences, is not considered as a high enough priority within the framework. 18 metre high buildings along the western side of Downer, which is my specific area of concern, is in my view far too high given the narrow nature of the suburban streets in such a suburb, and will result in major late afternoon shadowing through much of winter for those house on the eastern sides of such streets eg Blackett and Atherton Street. The plan also seems to have an underlying assumption that all blocks along the planned development corridor will be sold for development. I can assure you that as a resident on [……], I have no current such plans - I love my street, my neighbours and my community. In fact, my current plan is to extend and improve my current dwelling space. Should houses along the Northbourne corridor which lies behind my house be sold, my block would be directly impacted, given that such clocks would have a 6 storey height limit, and sit to the west of my block. My solar access is already limited given the fact I have a non-native tree of significance in my backyard on the northern aspect of the block. This more than doubling of the current height limitscan only have a further direct impact on me and the other current residents of these affected suburbs. This is unwarranted. I do not argue that buildings will have to be higher, however the planned heights are too great and have an impact on current residents in the area, those who do not seem to have been considered within these plans in any way, shape or form. The plan only references changes possible along the Northbourne corridor, and has taken no view of other major arterial roads in the area. By using other such available roads, the height limits in these plans can be spread across a greater land area, rather than along Northbourne, thus the building height limits would not require such a massive increase in height. Phillip Ave and Antill St are both dual lane arterial roads and can handle a properly managed increase in traffic, which the suburban streets of Downer and Watson cannot manage such an increase, given that access from Northbourne is assumed not possible in these new designs. The height increase on the eastern side of Northbourne in this corridor does not seem equable, given that those on the western side have a stepped back 18m-12m height limit, yet on the eastern side, these are at 18m only. This again is an increased impact on the currently populated side of the corridor, given that the western side has little development undertaken. I argue a greater use of this land is required, and the potential extension of the plan further into Mitchell to allow use of currently unoccupied land to make proper access to the new light rail corridor on Flemington and Northbourne, whilst spreading out the 4,000 person population increase.

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	There is further inequity in the population increases proposed, given that the "Informal Boulevard" from Flemington to Antill is to take an extra 4,000 people, yet the "Formal Landscape Avenue" is to increase by 3,500 people, yet it is longer, is to be developed on both sides of the corridor, and has two Urban Villages panned within its scope. The "Informal Boulevard" has a focus on Watson and Downer, and thus in reality 60-70% of this 4,000 person increase will occur in this area, therefore 2,500-3,000 people are to go into two suburbs with a current combined population of approx 10,000. This is a huge increase in population in a small timeframe, in an even smaller area given the limited nature of the landspace scope of this plan. The infrastructure for these suburbs, such as water and sewage, electrical and telecommunications is old, and will need a major upgrade to support such a population increase. This will lead to a lot of inconvenience for current residents whilst these upgrades are undertaken, following on from the inconveniences of the light rail development. I have further questions as to the planning of the service roads as there placement to Northbourne. The plans state the is a set back of 30-40m, yet the current service road along Northbourne, at Downer, is no more than 10m from Northbourne. How will this 30m setback be achieved, other than by going through current blocks of land. Are the ACT government planning a buy back? All such blocks would have to be purchased, given that the road will need to run for the length of Northbourne, yet this is not acknowledged within the plans. In summary, I feel that this plan • is limited in the land space view of where population growth is possible • is inequitable in the distribution of development within the "Informal Boulevard" area • is inequitable in population increase against other corridor spaces • takes little consideration of existing populations in these suburbs in its planning • seeks to overly increase the building height limits in areas with existing dwellings, whilst lowering those in areas of greater "greenfield" scope • takes little consideration of current infrastructure in its planning • is not accurate in its impacts to current landholders I thank the Planning Directorate for this opportunity to provide feedback, and look forward to this and other feedback being incorporated in an updated plan, a greater level of stakeholder engagement, and a further round of communication as to how the new light rail corridor can be effectively used by the ACT government to sustainably grow the city in a robust manner over the next 25 years.
108	I generally commend the Draft Urban Design Framework philosophy to “Incentivise sustainable design that respects people, place and the planet” (page 11). These design considerations are evident in The Approach Route, The Informal Park Boulevard and The Formal Landscape, which prioritizes pedestrians and cyclists and promotes Sustainablity, Solar Access and the reduction of Heat Sinks. The use of “wide verges that provide space for pedestrians, cyclists, outdoor cafes and shade trees” (page 3) facilitates some of these aims.

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	But this whole approach has been LOST south of London Circuit in "The Threshold of the National Triangle". From London Ciruit, around Vernon Circuit and to the Lake some of the tallest buildings are allowed with only 40m building to building and 0m setback. The Avenue of vistas, people, spaces and trees and tree canopies is chocked down to a cold canyon of concrete, steel and glass of the tallest buildings with no "wide verges for pedestrians, cycling, outdoor cafes and shade trees". The allowing of the tallest buildings and close spacing will contribute to a loss of Solar Access, cause Wind Tunnels, and along with the lack of trees and shade will cumulatively create greater cold in winter seasons and heat sinks in summer seasons. Currently this land has no buildings on it and is mostly carparks and grassland. I respectfully request that NOW, and BEFORE buildings are erected, is the appropriate time to ENSURE that there are plenty of wide setbacks allowing "wide verges that provide space for pedestrians, cycling, outdoor cafes and shade trees" in "The Threshold of the National Triangle". Tall Buildings creating cold canyons with 0 setbacks is NOT an APPROPRIATE "Threshold of the National Triangle." Also Vernon Circle NEEDS Traffic Calming to encourage greater pedestrian access to City Hill.
109	**Overarching Comments** The Framework could provide a guide to the future shape and look of northern Canberra. However, the Framework takes an **unnecessarily narrow view of north Canberra** and does not adequately consider **impacts on the north Canberra community**, particularly in Downer and Watson (the northern investigation area). The Downer community has not been meaningfully involved in the consultation process and there is no evidence that social considerations have been fully explored. While many in the community, including ourselves, support improved land use and densification, this needs to take account of the existing community and of future community development. The **Framework as proposed does not support sustainable development in terms of infrastructure or community** as it promotes strip development rather than the urban villages and culture it seeks to promote; further isolates Downer from its surrounding communities and services which impacts on social inclusion, active travel and education outcomes; and does not consider the existing community or families. We consider aspects of the Framework work against its stated purpose, including access and movement; better places and streets; and sustainable communities. Arguments in support of this are outlined in the section **'Issues of concern'** below. We submit an **alternative approach**, including increased density at a more manageable scale; a phased approach to zoning change to bring a more orderly change to urban form; less emphasis on strip development to improve economic and social outcomes; improved community infrastructure to enhance social inclusion and active transport. **A more sustainable alternative** There is no doubt that Canberra needs more and improved housing stock to support a growing population and changing consumer demands. However, this needs to be done in a measured and staged way to maximise the benefits for the urban form, community development and social inclusion, while seeking to minimise the negative impacts that poor development decisions can have on existing communities. We recommend: 1. *A staged approach to rezoning*

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	Rather than rezoning all parts of the Northern Investigation Area, this should be done over a period of time. Rezoning (if required) to encourage redevelopment between the City and Antill street would be the initial priority, given its existing urban form and the level of redevelopment currently ongoing. In the medium term greater density, to three stories, should be permitted for properties facing Northbourne Avenue north of Antill Street to support the development of the Gateway concept. However, densification of properties behind Northbourne Avenue on Blackett, Atherton and Banfield Streets should be deferred to the medium term (15-20 years). This will prevent the 'cherry picking' of properties by developers leaving a patchwork of mismatching development or landbanked properties. Importantly this would provide time and space for residents to adjust, and to take advantage of the lifestyle investments they have made in existing properties. Given the Framework considers it will provide housing stock for up to 75 years a measured approach will give community benefit while still meeting overall housing needs. 2. *Building heights to be more consistent with amenity* While we agree some change to building heights should been encouraged, the heights currently proposed in the Northern Development area are too high. We consider heights should be limited to three stories on Northbourne Avenue, dropping to 2 stories on the streets backing onto it. This will allow a more gradual transition, reduce the impact on existing communities, and would encourage townhouse style development which is currently lacking in the area. This would also fit more closely with the treescape (which must be retained), supporting the bush capital image of Canberra and protecting access to sunlight. 3. *Nodes not strips* The current proposal for the Northern Development Area propose a narrow area of rezoning and height increases along the Northbourne Avenue and the Federal Highway, leading to strip development. To support the development of community, it would be preferable to incentivise redevelopment at community centres. While redevelopment is proposed on the old Downer school site, there is further scope to rejuvenate the housing stock in that area, which is already at 2 stories, and support the redevelopment of the shops and community facilities to create a genuine urban village. While the Framework claims to cover the whole of Downer, the changes concretely proposed focus on the Northbourne Avenue corridor- this needs to be expanded to enable full consideration of the suburb of Downer. 4. *Improve infrastructure first* Downer has poor community infrastructure and does not support active travel with poor quality and narrow footpaths, many streets with no footpaths, and no cycling infrastructure. While the Framework nominates Swinden Street as an active transport corridor, no concrete proposals are indicated on how to achieve this. This infrastructure needs to be provided ahead of development, so the existing community can transition to greater use of active transport, overcome some of the limitations of East-West travel options and access the Capital Metro more effectively. 5. *Consider community*

No.	Submission
	The Framework has been developed largely in isolation from the Downer community. Until release of the Framework there was no awareness it would cover Downer, and the limited comment on the area demonstrated in the Stage 1 Community Engagement Report indicates a lack of awareness and poor consultation, not any lack of interest or passion from the community. The next stages of the Framework need to fully engage with community and to take account of the existing community. This will need to fully consider social inclusion and the impacts of any proposed changes on community. New development of this nature offers tremendous opportunity, but it needs careful and real community engagement to be realised. 6. *Develop a plan, not a framework* While the Framework outlines urban design principles, it offers little guidance on how these will be achieved. As such it provides a vision but offers little confidence they can be realised. The next stage of the Framework needs a proper implementation plan, with indications of when and how changes will be made, including commitments to infrastructure improvements, and a clear indication of what will be legislated changes rather than aspiration. This should outline what the proposed changes to the Act will need to be in order for the Framework to commence, and what will be mandated for developers. **Issues of concern** Downer risks becoming a dormitory suburb, which the strip development supported by the re-zoning approach in the Framework will exacerbate. Downer has few amenities within the suburb, in particular: ○ Little support or incentive for active transport, ▪ no bike paths (with the exception of the southern end of the Bike path from EPIC to the Northbourne Avenue service road); and ▪ poor foot paths- with no foot path on some streets, including streets connecting to the nominal Swinden Street active transport corridor and major streets such as Barney Street and other footpaths being narrow and in poor condition. ▪ The Garden City Bikeway concept (page 50) is welcomed, however does not address East-West transport, or transport to educational facilities. ○ Poor connectivity to educational facilities ▪ with no schools in suburb ▪ Reduced safe or timely access to primary education by the separate decision to remove Downer from the North Ainslie Primary school catchment- forcing attendance by a reverse commute to Majura or across 6 lanes of arterial traffic to Lyneham. Existing North Ainslie Primary school students residing in Downer have no safe exit from Downer to link to the Sullivan's Creek bike route. ▪ no high schools within a reasonable distance on the East side of Northbourne Avenue- Campbell High being distant and in a different community, Lyneham High again forcing a commute across 6 lanes of traffic ○ No shops (1 café and a vet) or employment opportunities. ○ There is no 'urban village' in Downer. There are no developed local shops, church, school or other 'village' facility to orient the community around. Many Downer residents are committed to the local community. This Framework detracts from, rather than builds on, this strength. ○ All services (aside from one café and a vet) are external to the suburb

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	• Poor transport, access to educational facilities and other services can hamper social inclusion, particularly for the aging or those with young families. While Capital Metro will assist travel to the City and Gungahlin, it does not assist east west travel (indeed hampers it) or to local services.
	
	• The Framework focuses on North-South traffic but does not adequately consider:
	  ○ The needs of travellers seeking to access Northbourne Avenue.
	  ▪ Exit from Downer using Pigot Street, Melba Street and Swinden Street is becoming increasingly difficult, particularly if lane changing/merging is required.
	  ○ Travellers seeking to cross Northbourne Avenue.
	  ▪ Car transport to/from Lyneham has become difficult, with 20 minute trips from the Lyneham education precinct the norm and 30 minute trips usual- for a short distance. A 6-lane road and poor active transport options make walking and riding difficult, particularly for school age children.
	  ○ Access to Southwell Park, a major community facility, has been curtailed by removing south travelling access to Thurbon Road (i.e. from Downer and Watson).
	
	• Critically, the recommended building heights and approach to zoning will have a significant and largely adverse impact on Downer and Watson.
	  ○ Buildings of up to 6 stories facing to Northbourne Avenue will create a walling effect for the suburb in both a practical and psychological sense. This is out of character with the existing suburb and amenity.
	  ○ Buildings at this height would not blend with the treescape and would remove forever the treelined vista and reputation of Canberra as the bush capital.
	  ▪ The Framework notes in most cases developments would not be above the existing canopy but the area under consideration on Northbourne Avenue between Stirling Street and Antill Street do not appear to have many 18 metre (six storey) trees in place.
	  ○ Buildings of four stories on the backing streets will create significant adverse outcomes for nearby community, including
	  ▪ Significantly Increased traffic on already narrow streets and associated parking increases, particularly during construction phases.
	  ▪ Increased 'rat running' down adjacent streets e.g. between Swindon Street to Pigot/Antill Street exit.
	  ▪ Impact on visual amenity and sunlight via the proposed heights and also proposed maximum building lengths.
	  ▪ The design of any building needs to take into account both front and rear visual amenity and light pollution from higher buildings to lower.
	  ▪ There is no clarity on location of services such as rubbish, utilities and other services requiring large vehicle access, with the implication these will be on backing streets.
	  ▪ Negative impact on housing values for properties facing this high density development.
	  ▪ While the Framework refers to a 'step down' in height, going from (18 metres to 12 metres), the drop to the single storey dwellings facing west is in fact a cliff.

No.	Submission
	▪ This proposal is a disincentive for townhouse style development, which the Framework (page 65) itself notes is often preferable for families. Downer is a family suburb and is currently undergoing a significant demographic shift with many families moving to the suburb and often investing heavily in new builds or renovations. Developers will seek to maximise a return through apartment style high density development unless there is a clear zoning or economic restriction on them. o While the Framework (page 29) notes the importance of a symmetrical edge to the corridor, this is not possible opposite Southwell Park, which will not be developed. ▪ It is noted that while development on Flemington Road offers few positive precedents, development opposite the North Mitchell Grasslands open space is limited to 3 stories, which is a more appropriate level for buildings facing open public space. o The zoning approach will see north-south strip development, which will not support the development of nodes for social or community activity. o It is unclear how the urban renewal principles will be met, such as 'strengthen' as the proposal appears to detract from the Bush Capital character. o There is no detail on how 'innovative and sustainable design' will be incentivised. o There is no detail within the Framework of what will be legislated in the changes to the Act and what is a 'nice to have'. o Is the site development happening in a staged approach, or is land available for development at any time? What is the time limit between purchase and commencement of development? The Framework estimates 75 years of supply, but there is nothing to stop developers cherry picking sites, with risks maximising impact and minimising the benefits of the Framework. o The Framework does not articulate how it will address housing affordability, social inclusion or social housing.
110	**General comment** The word sustainability features a number of terms but is used as a buzzword as it is never defined and never linked to the ACTs broader sustainability framework, initiative or any real key indicators of sustainability. As the strategy doesn't link to a broader framework, it is unlikely to result in anything sustainable, it will merely push unsustainability problems somewhere else. In particular, the section on traffic and reducing lanes of traffic, are part of a regional planning issue and should not be included in this framework. **<u>Comments on the Framework</u>** **Areas for Future change** Map3 The concentration of RZ3 and RZ4 near the intersection of Macarthur and Northbourne should be abandoned. This area is a great place to plan an employment hub and plan zoning should encourage a major employment hub in this area with a concentration of business and mixed use. Its unclear in this map if the park on Lowana street will be retained as open space, why isn't there low (Ie max 3 storey) rise mixed use around this area and more low rise mixed use along Lowana street?

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	The Spatial Framework – page 9 The spatial framework set out in map 2of the C&GDUDF is disappointing. It a major opportunity lost if the only objective of this framework is to confer maximum development rights on a few rather than creating distinct urban spaces and landmarks for the many. This strategy seems out of sync with the recent discussion paper the government released on sustainability and is moving Canberra towards being a concrete jungle rather than a sustainable eco-city. There is no mention of how the current ratio of urban surface to green surface will be enhance. **Urban built form – page 13** Urban form needs to ensure that allocation for retail and commercial space is maximized around each light rail station **Approach to the National Capital – page 17** I disagree completely with the notion of transition zones and enclosure of the route. **The Avenue – page 24** The garden City must flow up and over buildings along the avenue with green walls and green roofs mandatory. The current area should enhance opportunities to increase ratio of urban to green space with roof tops considered part of the public realm and opportunities for public access to the roof areas maximized. **Figure 5 – page 25** The use of Figure 5 should use a visual impact assessment to demonstrate that overall vista of parliament house and Brindabellas is not impacted. Urban form must ensure there is no loss of public space vista of the lake, Capital Hill/Parliament House and the view to the brindabella mountains is actually enhanced as part of the journey down Northbourne. **Building Height** Height should remain static and set backs should increase as one gets closer to City Hill to allow greater capacity for exchange and concentration of people and modes of transport **Building setback – page 30** Incremental enclosure of the route along Northbourne should not be permitted **Solar access – page 30** existing solar access must not be diminished, there should be zero impact on existing solar access, otherwise this plan conflicts with sustainability principals. Where solar access right is diminished, it cannot be diminished by more than 20% and lost that right must be compensated on an ongoing basis via rates subsidy to the impacted property, subsidized by the development and protected by covenant. **Roof design – page 31** Smaller commercial tenancies should be permissible on roofs as should enhancement of the public realm. Wherever possible roof top should be developed as green roofs with public open green space and available for public access

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	Building separation and design – page 31 Setback and Space between buildings within the urban avenue should not impact views or vistas of the lake, Parliament house or the Brindabellas. The City urban form should provide an amphitheater that one enters for a view of the parliament house. Building separation should be driven by solar access and maximizing green walls and green roofs, otherwise, this strategy is not sustainable and not positioning Canberra as a liveable eco-city Can you explain the 25m +10% rule on page 17 and the 44-48m (RL617) high rule identified on page 29. What is proposed along the route? Why have you not discussed wind tunneling and turbulence – this is already a major issue in Civic but is completely lacking in any planning requirements. Pedestrian and cycling comfort and safety must be paramount in this area. All redevelopment in London must baseline and then assess the impact of a larger building on turbulence and wind tunneling **Deep soil zones – page 33** A minimum of 7% deep soil zone is not enough and is not moving Canberra towards a sustainable ecocity. 20% should be the minimum. The flooding in Turner and Oconnor earlier this year – with climate change, high intensity stormwater and flooding this scenario will become more common. The existing ratio of urban surface to green surface/deep soil zone of areas must be maintained **Public Realm – page 34** A % of all rooftops should be considered part of the public realm and developed and accessible for such purposes. Use of these areas can enhance panoramas, can be used to green and soften the city and are presently wasted spaces. **Urban Villages – page 37** Macarthur - Why is there no require for green walls and green roofs as part of design in these areas? Medium density residential should not be pursued in this area – make it all nixed use but restrict heights to three – 4 storey as one moves away from Northbourne, this is a great location for smaller bus interchanges to feed the light rail and move commuters to venues such as Canberra stadium. The public realm should include a % of the roof tops of the core area buildings, with restaurants gardens and public swimming and gym and fitness facilities provided in these areas **Strategic Transport Network page 42** I do not support the proposed changing role of Northbourne, Northbourne should remain a key through traffic route that directly connects north and south Canberra. **People First Approach – page 44** I completely disagree with people first approach along Northbourne. That is ridiculous. Figure 10 is appropriate for side streets parallel with Northbourne but not Northbourne Avenue as it a major arterial road. There should be no loss of vehicle laneways as proposed in figure 12. Rather additional bikeways and pedestrian areas should be built into the setback areas **Strategic road network - page 49** There is should be no changing role for Northbourne - its role is as a major movement corridor for all of Canberra and the region. The title of this strategy is City and Gateway strategy, however you propose to limit Northbourne as the key Gateway arterial road, which makes this title nonsense. Northbourne's

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	key planning principle must always be movement, mass movement of people and commerce to key locations where exchange can occur. This part of the planning strategy is nonsense. **Northbourne Plaza – page 58** I do not support any loss of vehicle lanes in the area known Northbourne plaza or figure 15. I prefer pedestrian/cycling bridges or tunnels in multiple locations across Northbourne that allow pedestrians and cyclist easy crossing of Northbourne. I love the pedestrian/cycling crossings over the Yarra or the large wide crossing over southern cross station. Pedestrians are capable of crossing multiple lanes of traffic all over the world why do you see it being an issue for Canberrans? **Acknowledging the cultural rights of Aboriginal and Torres Straight islanders** – page 60. This should feature way more prominently in this strategy as most Canberrans want to connect with this culture as often as possible. I would like to see parks in west basin really emphasis culture stories and art of the Ngunnawal.
111	I wish to raise the issue of the new planting of Brittle Gums lining the tram route along Northbourne Avenue. These trees are so named for their propensity for losing limbs and falling. Bushmen call them 'widow makers' for good reason. The recent tragic death of Radford Teacher, Jonquil Mackay near Tumut illustrates the danger of eucalypts. In the suburban setting I have researched and found there to be many deaths, injury and property damage caused by gum trees. These occurrences, are far more prevalent than lightning strikes and far more common that is recognised. I have read heart wrenching accounts of children being killed in parks and schools by falling gum trees. Almost every week a tree falls randomly. Most people luckily escape death , but not always. The eucalypt has a shallow root system and not adequate to support the upper story. This causes trees to lose branches at random or to completely fall over. It is time to stop being Decidouphobic and see deciduous trees in their right perspective. They have deep root systems and a green stick configuration , that bends rather than snaps. They are safer than the eucalypt which randomly falls and drops limbs. There are many benefits of deciduous tree which I will not go into now. Action needs to be taken before the tram is crushed by gum trees , killing car drivers and train passengers. Gum tree should be removed from parks and schools to prevent more deaths of children.
112	*Permission not granted to publish.*
113	*Permission not granted to publish.*
114	The Housing Industry Association (HIA) welcomes the opportunity to comment on the *City and Gateway Draft Urban Design Framework*. The draft is a very comprehensive document that outlines the potential for a vibrant corridor along the city entrance and Northbourne Avenue. It has identified that under the framework, there is the possibility of an additional 19,750 dwellings within the corridor. The addition of a significant number of dwellings to the ACT housing stock is welcomed. However, with recent data showing a softening in demand for higher density housing product, it will be important that the reforms in medium density housing that are being progressed through the *Housing Choices* process can continue to a conclusion. This will provide a greater diversity of choices for Canberra home buyers, while also transitioning to the lower density precincts either side of the development.

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	The draft makes reference to energy and water use, accessibility and living/working spaces. These are all important considerations of the final shape of the build form, however, in finalising the design framework it is essential that it is not inconsistent with the requirements of the National Construction Code (NCC). Any requirements that go beyond the NCC should be by negotiation with industry and be applied voluntarily using incentives. Again, the draft appears an excellent blueprint for planning outcomes in the corridor. We look forward to seeing the framework progress.
115	I have recently reviewed the 'City and Gateway Draft Urban Design Framework' dated March 2018. I am an owner-resident on [….] St, Downer – […..] part of the Informal Park Boulevard zone. I object to the height of proposed developments in Blacket St due to: 1. Impact on the existing character of the residential area 2. Loss of solar access for existing residences 3. Loss of privacy for neighbouring homes. 4. The impact of traffic and congestion in an already very narrow street. **Draft Framework**: Map 6, page 28 of the Framework indicates a proposed building height of 18 metres on the eastern side of Northbourne Ave, opposite the playing fields. This row of development backs onto the western side of Blacket St. From Figure 5 on page 23, it appears that the proposed building height for the western side of Blacket St would also be 18 metres (approx. 6 storeys). Page 29 states that "Where development interfaces at the rear with lower scale built form, or a street containing lower scale built form opposite, an appropriate transition height shall be applied." Page 7 of the Framework states that in this Informal Park Boulevard zone, buildings should generally sit below the tree height. **Impact of proposed building heights:** 18 metre buildings on Northbourne Ave, backing onto 18 metre heights on the western side of Blacket St, directly facing our row of single-storey original-style homes, is a complete breach of the design criteria of transitional heights into the residential areas. **18 metre buildings on the western side of Blacket St would:** 1. Significantly diminish the character of one of Canberra's highly admired tree-lined inner northern suburbs. With one exception, this stretch of Blacket St is currently all single-storey homes, either original 1960s construction or recent rebuilds broadly sympathetic with the original designs. The beauty of the entire suburb can easily be admired by driving east along Ginninderra Drive from Belconnen towards Downer. The view of Downer is purely trees – no visible buildings. The original streetscape design and the magnificent old trees typify the character of the inner northern suburbs of Canberra, so admired by visitors from Canberra's new suburbs, from interstate and overseas. 2. Significantly impact solar access for residences on the western side of Blacket St (which runs due north-south). Without the expertise to calculate building heights, distances and sun angles, I would anticipate possibly complete loss of any afternoon sun into my property, if a 6-storey development were built opposite my western-facing home. 3. Impact privacy in the front yards, into internal living spaces, and possibly also into the backyards of neighbouring residences.

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	4. Impact traffic flow and parking in an already narrow street. Blacket St is already a narrow street – approx. 7 metres wide. If there is a parked car, it is already too narrow for 2 cars to pass each other. If the proposed high-rise developments were to proceed, the increase in traffic flow and parking pressures would be untenable. The low-rise buildings, nestled under a canopy of old trees, is what makes Downer special. The proposed developments would not enhance, but instead destroy the features that make this suburb so delightful, and why most of us chose to live here. **A reasonable compromise:** If high rise buildings are to be built along Northbourne Ave, I consider that a maximum of 2-storey developments on the western side of Blacket St would be a reasonable transition into the surrounding single-storey suburb. I have been a supporter of the light-rail development since its proposal, and welcome the development of the Northbourne corridor, but believe strongly that this development should not be imposed at such significant expense of the neighbouring residential suburbs, and with disproportionate impact on just a few streets in Downer.
116	I am writing to you as quickly as I can in order to meet a short deadline for submission on the proposed Canberra Gateway Project. A central component of this project is the elevation of permissible building heights a. to twelve metres, i.e., approx. five storeys, depending on design, along land directly facing Northbourne Avenue from Antill Street, Dickson, to Stirling Street, Watson; and b. to nine metres, i.e., approx. three storeys, depending on design, along land immediately behind the land affected by (a). I trust that I have described these proposed changes correctly, as I have only learnt about them through the Public Meeting held by your team on April 9th in the Downer Community Centre. There are numerous aspects of these proposed changes to permissible building heights which concern me but I will restrict myself in this submission to issues concerning the impacts on traffic likely to be caused by significant high-rise development. The Likely Impacts of High-Rise Development arising from the Canberra Gateway Project on Traffic in and around Downer In Part I I consider the likely impacts under the assumption that the buildings to be built along the land affected by the proposed changes will be primarily residential, not commercial. In Part II I consider the likely impacts if, as is presumably intended, there is significant commercial development in addition to residential development. 1. Likely Impacts of High-Rise Residential Development Impacts on Traffic Flow 1. Large-scale high-rise residential development means a significant increase in the number of people living in and around Downer. 2. It is reasonable to assume that significantly many of these new residents will own cars. 3. 3. For significantly many of these residents public transport will not provide an alternative to the use of their cars—see my justification for this claim below. Justification for Claim 3: It would be either false or at least unsubstantiated to maintain that the new residents will overwhelmingly use the new light rail. For it is simply not the case that most people work either in Civic, which the government appears to want to turn into a CBD in the traditional sense, or in Gungahlin, which, unlike

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	other town centres, was built without any major employer. Nor has the Gateway Project been developed on the basis of a well-worked out plan to massively improve the existing relatively poor bus service to other destinations. We have therefore also been given no reason to believe that future bus services will provide a viable alternative to the private car for residents of the new development. The Gateway project will therefore generate significant volumes of traffic on Northbourne Avenue itself, and in particular at the intersections of Northbourne Avenue with Antill and Mouat Streets, with Phillip Avenue, and with Flemington Road. Note that this increase in volumes will only be compounded by the Dickson Town Centre if, as is also proposed, this is significantly expanded. My justification for Claim 3 above points to a further concern: There appears to be no plan for the management of likely impacts on traffic in and around Downer. Certainly, at the community consultation meeting I attended on April 9th. in Downer, no mention was made in the opening remarks made by your team leader about how these likely impacts will be dealt with. It will not do to reply that a traffic management plan will be retrofitted since the ability to develop a satisfactory plan upfront constitutes a test of whether the proposed development is able to satisfy requirements for adequate traffic management. Impacts on Parking 1. Most residents of the new development will want to park their cars somewhere. 2. Given the size of the proposed development, this will require underground garaging. 3. Very often, however, residents of high rise developments do not use the underground garages provided for them but rather park on the street. Justification for Claim 3: Using an underground garage requires inconvenient and time-wasting manoeuvring in confined spaces and the operation of elevating doors, which becomes particularly significant when one is making several trips on a day. 4. Furthermore, most residents of the new development will have friends and other visitors who own cars. 5. Such people cannot park in the underground garages provided for residents unless these garages are very large and presumably also unsecured, so as to permit ease of access. The new development will therefore mean a significant increase in the numbers of parked cars and of cars roaming nearby streets in search of a parking spot. Once again, no plans for dealing with issues of parking were mentioned at the community consultation on April 9th. There appears to be no plan for managing parking in and around the area intended for the Gateway project. In this regard, too, one may therefore say that the proposed development has not demonstrated its capacity to deal with problems of traffic management. Finally, it is worth pointing out that the building of massive underground car parks requires significant earthworks and significant use of concrete and other hard surfacing materials, thereby 1. exacerbating problems of urban run-off; 2. enhancing heat island effects; 3. destroying green space; 4. contributing to greenhouse gas emissions during construction In fact, the building of high rise in general involves large amounts of concrete and a high of hard surfacing. Such construction thus itself embodies large amounts of embodied energy and, when built, stores heat. Moreover, contrary to popular belief, one I understand to be shared by the ACT government, high-rise living is not essentially more energy-efficient in particular and resource-efficient in general. Justification for the latter claim:

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	Work done by Patrick Troy and Stephen Dovers at the ANU has demonstrated that high rise living does not inherently tend to bring about a reduction in resource use (and thereby in greenhouse gas emissions). I am happy to provide this research on request. These issues indicate a general failing: The proposed project inadequately adheres to the principle that one should develop a conception of how a site will interact with its environment at the same time as one develops a conception of the internal site character. With regard to traffic, this means developing an accurate conception of how people will move to and from the site in conjunction with developing a conception of what the site will be. Note that adherence to this principle would rightly bring into play issues of regionalisation and regional planning. Thus, some of the issues caused by, e.g., the fast rate of growth of Gungahlin could be addressed by 1. having major employers in Gungahlin; and 2. linking Gungahlin up not just to Civic but in equal measure to other town centres. Indeed, it would ultimately require that one link Gungahlin up to the outlying townships near Gungahlin, from Gundaroo and Sutton through to Gunning, Collector and even Goulburn. Naturally, this only represents an application specifically to Gungahlin of a general principle which should be applied to all town centres, hence, to Canberra as a whole: We need to develop a holistic plan of how people live and move, i.e., a plan for all of Canberra in its region, a plan, therefore, which does not focus piecemeal on particular kinds of dwelling, particular routes or particular technologies. II. Likely Impacts of High-Rise Commercial Development The level of commercial development arising from the Canberra Gateway Project will have its own significant and distinguishable impacts in and around Downer. Yet in the presentation given to Downer residents at the community consultation held on April 9th, no indication was made as to how large a component commercial development would be in the Gateway Project. This raises general questions which must be addressed upfront when asking residents for their views. Does the Gateway Project seek to intensify commercial activity along Northbourne Avenue, what kind of commercial activity does it seek and in what proportion to residential development? It is pointless to discuss the appropriateness or otherwise of increases in permissible building heights without clarifying just how many restaurants, hotels, real estate agencies, coffee shops, fashion boutiques and the like will adorn the Canberra Gateway. The intention must surely be to intensify commercial activity significantly. For presumably the government does not believe that rows and rows of apartments will impress visitors arriving by car or on a Murray's bus. Nor indeed will a high-rise dormitory promote the urban vitality which the government has used to justify densification generally. In fact, we know already from Simon Corbell that light rail was chosen over a radically improved bus service between Gungahlin and Civic because in his opinion only light rail brings commercialisation and thereby the greater economic activity required for enhancing the government's currently tenuous revenue stream. 1. Depending on the degree of commercial activity, the Canberra Gateway. Project will induce a significant increase not just in residents but in customers, clients and patrons. 2. Customers, clients and patrons will not generally access the area by light rail, at least not in the foreseeable future, since light rail will only run between Civic and Gungahlin. No doubt a completed Phase Two of light rail would mean more access to the area by light rail but we have no idea as to when Phase Two will even commence, much less be completed.

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	3. Since, as indicated above, no well-worked out plan for improved bus services Canberra wide has been presented alongside the Canberra Gateway Project, one can only assume that these individuals will by and large access the area by car. Significant levels of commercial activity will therefore mean increased nonlocal traffic flows and parking demand over and above what would be the case were any development only or largely residential. Note that these non-local traffic flows and parking demand will only be exacerbated by the close proximity of the Dickson Town Centre, particularly if this is significantly redeveloped and expanded. Are massive high-rise car park houses currently planned? Presumably not but they may well become necessary because the Gateway Project has been so poorly conceived and threatens to be so poorly implemented. Finally, significant commercial development would require access not just for customers, clients and patrons but also for employees and service providers. Given, however, the nature of shift work, employees will almost certainly access the area by car. There will also be significant increase in the numbers of delivery vans, vehicles of tradespeople and the trucks of dumpster hire firms. None of this was mentioned in the community consultation of April 9th, yet this is crucial to the acceptability of the Gateway Project. Concluding Remarks Thus far I have accepted without question the assumption made by the ACT government, by developers and presumably by the Project team itself that the development envisaged will actually be economically successful. Yet we have ample evidence—in Australia, Melbourne Docklands and arguably also our very own Kingston Foreshore—that attempts to engineer economic vitalisation through highrise development can go wrong. As proponents of Melbourne Docklands have learnt to their cost, there is an upper limit to how much coffee and bruschetta a community will consume. No solid evidence has ever been presented that the economic vitalization envisaged will actually eventuate. There is all the more need for such evidence as presumably any commercial development along Northbourne Avenue will encounter competition from the Dickson Town Centre, particularly if this is massively redeveloped. Furthermore, Ben Phillips from the ANU has argued convincingly that there is already an over-, not under-supply of apartments. There is therefore, at the very least, no evidence that massive high-rise residential development along Northbourne Avenue or anywhere else will significantly enhance housing affordability All in all, a substantive economic case has yet to be made for the Gateway Project. So why do we need a gateway at all? Indeed, the overall rationale for the Canberra Gateway Project has never been adequately explained. Prima facie, there is no justification for it: the assumption that Northbourne Avenue and the Federal Highway is the primary entrance to Canberra, as opposed to, say, the airport, has never been justified. Nor has it ever been explained why an ostensibly grand urban boulevard would be essentially more impressive for those arriving by car or by bus than simple improvements of Northbourne Avenue and the Federal Highway, for example, well-conceived plantings of native trees from the NSW border down. Such measures would certainly be cheaper and less invasive; moreover, they would arguably be more impressive because the idea that an urban gateway should consist of flats and shops is actually a very conventional one not at all in keeping with Canberra's image as the Bush Capital. Before anyone in the Canberra community can accept the Canberra Gateway Project, the justification for it needs to be be much more substantial. Otherwise residents not just

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	of Downer but of Canberra across the board will suspect that the Canberra Gateway Project is entirely disingenuous—that the concept of an ostensibly Grand Boulevard at Canberra's entrance is simply a ruse for giving developers access to the Inner North, with the consequent short- to medium-terms revenue gains for the ACT government. I and many other residents of Canberra fully understand that the ACT government has a serious revenue problem: 1. Whereas in years past revenue could be raised from green fields land release, this source is now drying up; 2. Canberra has no significant industry apart from retail, hospitality, property, construction and the airport; and 3. Canberra is growing, at least for the moment particularly in Gungahlin. But precisely because this is a serious problem, I and many others cannot accept what has been put before us. The Canberra Gateway Project is a shallow answer to a deep problem. It is fundamentally flawed, precisely at that high conceptual level at which your team sought to pitch it on April 9th. We need therefore to go back to the drawing board and develop a conception of the future not just for this or that part of Canberra but for all of Canberra in its region.
117	*Permission not granted to publish.*
118	Thank you for the opportunity to provide suggestions and comments on the City and Gateway Draft Urban Design Framework. Here are some comments and suggestions: • **Diversity** - To me diversity is a key aspect of a successful urban design. This diversity should encompass not only building design (e.g. various building heights) but also a diversity of building uses. With respect to residential areas there should be a wide range (size, cost, target age) of accommodation options available within each urban/village centre. ***The framework should ensure that there are both diversity of building type and building use along the gateway corridor. Consequently there should be no exclusive or premium enclaves/precincts and no poor or lower-standard enclaves.*** I consider some of the large new developments within the Kingston Foreshore area as a good example of what not do. There are many buildings of the same height and with similar or identical appearance. Very unimaginative development indeed and once the "newness" wears off we will be left with streets lined with bland memorials to long departed developers. In 15 years' time will the following Kinston street become an urban ghetto or privileged enclave? What about the new buildings lining Flemington Road from Mitchell to Gungahlin? Not a lot of variation there. Not a lot of options for future Canberrans.

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	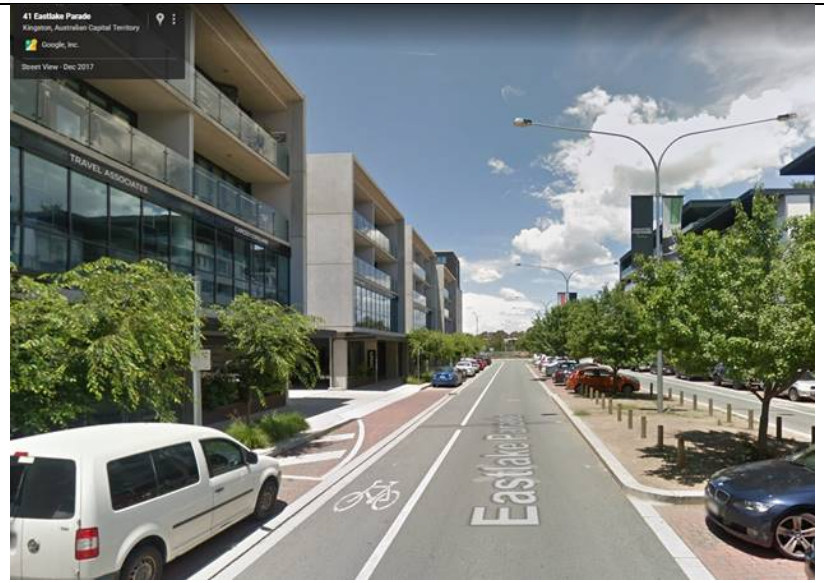 Google maps image of part of Eastlake parade in Kingston • **Building Heights** - With respect to building heights I would like to see all urban villages have enforced variations of building heights. For example, at the Northbourne Avenue and Macarthur Avenue intersection the buildings immediately adjacent to the intersection should have varying heights. This is desirable from both aesthetic and solar amenity considerations. Furthermore, no building's height should differ from its immediate neighbouring buildings by more than 20% (or 2 storeys), say. This will also allow for both better aesthetics, better solar amenity and reduce wind tunnelling effects. I would not like to see developments such as the following one in Woden Town Centre…

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	 Google maps image of approximately 25 storey apartment block • **Cycle Routes** - There are many mentions of cycle routes, cycle paths, cycle lanes, cycle ways and cycle links. I think it is great to encourage cycling in Canberra, as a recreation, a competitive sport and a means of transport. However, I suggest that most cycleways should not be shared with pedestrians and in particular any major cycle commuter links should be separated from pedestrians. Along Northbourne Avenue there will be a separate cycle way but other routes such as Sullivans Creek should also have ***separated carriage ways or lanes***. Pedestrians who travel under 10 km/h, say, should not have to share a lane with cyclists and electric bike riders who travel over 10 km/hr. It would be great for pedestrians to enjoy natural areas at a slow pace and not get in the way of fast cyclists. As an example, the growing shared use of the paths around Lake Burley Griffin by pedestrians and cyclists detracts a lot from potential enjoyment (and safety) of this important part of Canberra. High traffic areas should have segregated lanes and this should be built into the urban design. • **Future Proofing** – We cannot predict the future. We can make educated guesses about the future population, its size and demographics, its way of living and its needs. However, no one can say for certain exactly what the City and Gateway Areas will need in the future to flourish. On top of that, developers and the designers and builders they employ will have a target design life for their buildings and surrounding amenities. The design life will be driven by a desired financial return on investment over a desired period. No buildings will be designed to last for a 100 years say. More likely the viable life for a multistorey development will be around 20 to 30 years. Beyond that, maintenance becomes too expensive and the building is no longer fit for purpose for the age it finds itself in. Buildings and amenities begin to decline as the owners no longer invest in

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	them. Look at the derelict buildings around many of Canberra's suburban centres and town centres like Woden and the great loss to the surrounding communities. I would like to see better ways of dealing with situations where owners allow their buildings sink into a state of disuse and dilapidation. We should have ways of encouraging property owners to maintain old buildings, build new buildings or restore and return the land to the people. Conversely, there should be penalties for allowing buildings in town centres to remain vacant and become dilapidated – at the very least owners should return the land to a more or less "natural" state. Consequently the City and Gateway Draft Urban Design Framework should not be just about what should be done today and in the next ten or so years, it should also be able to ensure or at least encourage urban renewal cycles so that areas will continue to flourish rather than decline after 30 years.
119	**Introduction** I would like to thank the ACT Government for the opportunity to provide feedback on the City and Gateway Draft Urban Design Framework. The introduction of light rail into the corridor presents a unique opportunity to re-shape the entry to our city. This opportunity is matched by a responsibility: it's one that is unlikely to come again, and thus one we must, as a city, get right. I am broadly in support of the vision and principles of the plan. The changes it envisages are important for making sure Canberra remains a enjoyable and affordable place to live as it grows and reaches the edges of the developable area available. I have suggestions that I believe would improve the plan, based on two principles. 1. Urban areas work best for people when they are in use in some form during most of the day. 2. Urban areas work best for people when they prioritise the movement of people over the movement of vehicles. Some small changes to the draft plan with these principles in mind will help make the best of this opportunity for change, and help avoid repeating some of the weaknesses induced by planning rules in Canberra in the past. **Principle 1: Urban areas work best for people when they are in use in some form during most of the day** The draft plan deals appropriately with the gateway north of the area to be serviced by the light rail. However, for the light rail section of the plan area to function properly as an urban space the buildings along it need to serve as many functions as possible during the day. A corridor consisting almost entirely of residential buildings at the ground plane will not be the vibrant community envisaged by the draft plan, and will leave considerable transport infrastructure in the corridor underutilised during much of the day. Vibrant community spaces have reasons for people to be in them, or moving through them, at many hours of the day. This will only happen if the built form encourages this by having a mix of uses. Canberra's market today provides incentive to maximise the building of residential uses over all others. This is unlikely to provide the mix of uses that will serve the community (and the non-property) market best in the long run. Vibrant local villages need people working in them during the day, as well as living in them in the evenings, to thrive. The experience of many local shops in Canberra prove that shops need more than a small cluster of service businesses to succeed as community spaces – they need a critical mass of workers during the day to thrive. The draft should be amended to encourage buildings that will provide these community goods in the long run. These changes are:

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	1. Increase the area where mixed use is permitted, and mandate commercial/retail use on the ground floor on blocks facing Northbourne Avenue within 500m of a light rail stop. a) In Dickson: i. the mixed use area should cover the whole area east of Sullivans Creek and north of the intersection of Goodwin and Murdoch streets. ii. the mixed use area should include all blocks between Antill and Blackett streets as far east as Cowper street, and the blocks on the north side of these should be permitted mixed use on their south faces. b) In the Macarthur village: i. The mixed use area should extend east to Limestone Avenue, south to Burra Pl and park on Lowanna Street, and north to the intersection of Stockdale and Randall streets; west to Sullivan's creek, north to the northern intersection of Owen Crescent and De Burgh Street, and south to the intersection of David Street with Verdon Street and Wedge Crescent. Blocks one back from Northbourne Avenue from Antill Street to the Civic should permit mixed use. This should be extended further at the Dickson and Macarthur Avenue urban villages. This entire area is easily walkable from the light rail stop, and increasing the area where commercial uses are possible will provide the long-run texture that the urban villages will need to thrive. 2. Provide incentives for extra commercial space in this increased mixed use area. Developments in the mixed use zone should be permitted to build up to an extra floor of residential to the extent that they build an extra floor of commercial above the ground plan. In other words, a development with two floors of commercial would be permitted an extra floor of residential, giving a total height increase of 7m. 3. Development applications should not be permitted to reduce the current level of commercial area on blocks with existing buildings. 4. A smaller urban village should be permitted at the intersection of Phillip Avenue and Northbourne Avenue: node buildings of 17m (2 commercial + 3 residential) at the junction, and building heights of up to 12m 600m north of the Phillip Avenue stop, and along Phillip Avenue as far as Innes and May streets. 5. The draft could also consider using height incentives for other public goods, such open green space above the planning minimums on block edges. **Principle 2) Urban areas work best for people when they prioritise the movement of people over the movement of vehicles.** Urban villages function best when the movement of people is given priority over the movement of vehicles. The section of the gateway served by the light rail should prioritise human uses of space (indoor and outdoor) over other uses. In essence, this means reducing the incentive for space to be used by car-dominated roads. Change in the gateway over the next two decades will be considered a failure if it does not change the mix of transport uses at the same time. The gateway will not be a pleasant place to live or work if the extra people living and working there all primarily move into and out of the area by car. The draft plan can be improved to encouraging this change in movement by: 1) Reduce parking minimum requirements where buildings provide non-car transport options above the required minimum. For instance, a development could have its parking minimums reduced if it also provided public and private bike racks above the minimum required, and provided public and private spaces for car share providers. 2) Speed limits on streets in the mixed use zone (see principle 1) should be reduced to 20km/h. 3) On-street parking in this zone should be time-limited.

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	4) Additional access streets parallel to Northbourne Avenue should not be permitted within 800m of light rail stops. Increasing the separation of destinations from stops by adding a road for car movements is the opposite of giving priority to human movements. **Conclusion** The City and Gateway Draft Urban Design Framework provides a rare chance for Canberra to address some of the challenges faced by our growing city, and correct some of the legacy Canberra's well-intentioned planning past has left us. If we use this opportunity to give our city new housing choices and new public spaces that are a joy to live in; that function economically and socially; and that make efficient use of our investment in public transport, we will have succeeded. If we create vertical suburbs that hollow out during the day and simply increase the volume of commuter movements at peak travel times, we will have failed. I believe the recommendations above will help us achieve the former, and avoid the latter.
120	*Permission not granted to publish.*
121	Purdon Planning welcomes a renewed planning framework for the City & Gateway and would like to commend the Environment, Planning and Sustainable Development Directorate (EPSDD) and the National Capital Authority (NCA) for working jointly to develop the Draft Urban Design Framework (March 2018) (the Framework). As an urban planning consultancy, we appreciate the opportunity to comment on the draft Framework and to raise a number of issues for further consideration by both agencies in your review of the draft Framework. Northbourne Avenue is arguably the most significant urban and transport corridor in the ACT and is also of national significance as a processional route to the parliamentary zone so development of an effective planning and urban design framework to guide development in this corridor is of key importance. Notwithstanding the considerable body of work undertaken and consultation to date by both agencies, Purdon Planning questions whether this Framework goes far enough to promote the desired level of density along the corridor and we question whether the proposed changes will provide the best urban design outcome for both individual development sites and the public realm. Further, Purdon Planning consider that more industry engagement is required to ensure that the framework, when converted into Territory Plan controls, achieves the goals and objectives it set out in the framework and that the controls meet industry expectation. We provide the following assessment and recommendations to the Draft Urban Design Framework for your consideration. **Population Density** It is considered that approximately 30-40% of corridor sites have already been developed or are committed to development and will not be affected by the framework. This means that the Framework has reduced scope for change and needs to be quickly implemented to ensure it can be as effective as possible. In this regard it is questioned whether or not the 37,000-dwelling goal is achievable when considering the number of sites recently developed or committed. **Potential Yield** With regard to the revised height provisions proposed, we consider it unlikely that the goal of 37,000 dwellings can be achieved, particularly when applied with the proposed increase to floor-to-ceiling levels. We note that an objective of the Framework is to increase density through increased building heights. However, when these height uplifts are critiqued it is evident that the current Territory Plan controls do more to encourage density than those proposed in the draft framework. The current Territory Plan allows development in some areas up to 9 storeys (assuming a floor-to-ceiling height of 2.75m as

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	permitted). Under the proposed controls and new floor-to-ceiling heights, only 8 storeys can be achieved. This represents a reduction in development yield on some sites and is considered to contradict the objective of higher density along the corridor. Further, the dwelling figure of 37,000 takes into account a number of dwellings outside of the actual Northbourne corridor (Lake and City Centre sites). We recommend a review of development yield which considers the increased floor to ceiling heights and focuses on the corridor. We expect that there will be minimal increase in dwelling yield along Northbourne Avenue and therefore a need for an increase to building heights to promote density is needed. We assume that a key aim of the strategy is to increase potential patronage along the light rail corridor. If this assumption is accurate, there needs to be a greater focus on density, height and redevelopment of sites between Barry Drive and Flemington Road as residents in this part of the corridor are more likely to use light rail than those south of Barry Drive. It is considered that the majority of light rail patronage (from those residing along the corridor) will be travelling south (to City) rather than north (to Gungahlin). As such, building heights need o be increased in this section of the corridor to capture greater volumes of south moving passengers. **Public Realm** Purdon Planning considers the public realm a key element in developing the Avenue (Antill Street to Barry Drive) to its fullest potential. Retaining three lanes of traffic in this part of the corridor does not create priority for pedestrians or cyclists and contradicts the "people-first" hierarchy outlined in the draft Framework. Purdon Planning considers that from a place-making and urban design perspective, the proposal does not sufficiently prioritise pedestrians or enhance the landscape character of this avenue precinct. There are alternative traffic routes available to vehicles and the proposed removal of buses from Northbourne Avenue will free-up a lane, improve flow and encourage motor vehicle use along Northbourne Avenue. We see the Framework as an opportunity to increase the potential for a great landscaped public realm outcome by removing one lane of traffic and using a space to widen the verge to allow a dedicated "Copenhagen Style" on-road cycleway, make more room for deep rooted plantings and landscape elements commensurate with a pedestrian scale grand boulevard. **Verge Crossings** We raise concern with the removal of driveway connections along the Northbourne corridor for two key reasons. Firstly, we believe that rear streets along the corridor do not exhibit appropriate capacity to handle all traffic to the Northbourne Avenue blocks. Secondly, we consider that a number of uses, such as hotels require a street presence and block crossovers. We believe that limited driveways and appropriate management of conflicts, combined with our recommendation for a reduction to lanes and subsequent increase to verge widths will achieve a pedestrian and cycling friendly environment along the corridor. **Urban Villages** We support the concept of urban villages (nodes) in the Framework but question how these villages at intersections can properly function as integrated connected spaces. However, the concept of high buildings at the corner of intersection frontages is relevant and supported. The Macarthur Avenue intersection urban village in particular, has had marker buildings on each corner for approximately 20 years. We see the proposed nodes, as outlined in the Draft Framework, acting in a similar fashion to the marker buildings which have existed in this location over the past two decades. If these nodes were to reflect true urban villages, there would be significant pedestrian connectivity and priority between the marker buildings. At present, pedestrians will be required to undertake a three-sequenced crossing to cross Northbourne Avenue given motor vehicles and light rail will take priority. We do not see any

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	incentive for pedestrians to make this lengthy crossover, so it is unlikely that the positioning of marker buildings will contribute toward creation of an integrated urban village. There is concern that the proposal to include convenience stores at the Macarthur 'Urban Village' may erode the local centres hierarchy which the Territory Plan strives to protect. Analysis of economic impacts to local centres (Ainslie, O'Connor, Lyneham) should be undertaken by the ACT Government, as would usually be the process for a Territory Plan Variation. Purdon Planning also considers that a minor extension of the urban node at Macarthur Avenue is warranted along with an increase to the proposed RL617 height limit to allow redevelopment of the Pavilion site is appropriate. […….]. A similar problem can be seen at the Melbourne and Sydney buildings which have minimal interaction due to high traffic volumes dividing the two blocks. We acknowledge that the draft Framework proposes to close lanes between the Melbourne and Sydney buildings to promote pedestrian activity and improve vibrancy. This approach is applauded, and we suggest that this approach be extended further north to benefit the proposed urban villages. The Dickson Urban Village has distinct differences to the Macarthur Urban Village and the Federal Highway Node. The most significant of these is that redevelopment of Block 15 Section 33 Dickson will be key to achieving the objective of an enhanced urban village at Dickson. It would seem extremely unlikely that the Axis development will be redeveloped in the foreseeable future due to its relatively recent construction and unit-titled status. Further, there seems to be no plans to develop the open space zoned land within the Lyneham sports centre site and the Framework does not propose extending the Urban Village across Antill St into Downer. As such, to achieve the outcomes envisioned in the Framework it will be necessary to rely on Block 15 Section 33 Dickson. We consider that the continuation of the current 32m height limit for the site will not achieve the activity and vitality required to create a true urban village in this location. The development of a 32m high building will achieve a development similar to one of the Axis buildings. Such a building would be largely screened along the northern approach to the city by trees and existing buildings. While such landscape screening at lower building levels is a good outcome to achieve a human scale of development, the building height limit would not allow the design excellence of a marker building to be a prominent feature in achieving a distinct sense of arrival at this key intersection. As such, an increase in height at this node is considered necessary to achieve the objectives of the draft Framework. Refer submission for the lessee of Blok 15 Section 33. **Wider Scope for Higher Density Corridor** In addition, consideration should be given to widening the scope to address an increase in density for blocks one street back from Northbourne Avenue. This would incentivise redevelopment and allow the framework to be better implemented given a number of sites immediately adjacent to the corridor have been developed or will be developed under the existing Territory Plan controls. This approach will also allow for a more integrated approach between the buildings along Northbourne and their address to the rear streets. **Ground Floor Residential Use** Provisions should be made for use of ground floor areas along the Avenue (outside the "urban villages" for residential use. In particular, detailed design guidelines should be implemented for noise abatement and privacy by way of courtyard walls, provided these were well articulated and heavily landscaped.

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	Draft Variation to Territory Plan In terms of implementation, the conversion from a Framework to Territory Plan controls often lacks industry input and comment which leads to unrealistic rules or rules which hinder innovation. In this regard, Purdon Planning would be happy to facilitate industry communication to ensure that the proposed territory plan controls achieve the objectives of the draft Framework. Purdon Planning would urge EPSDD to take a merit-based approach rather than enforcing mandatory rules to criteria such as height. Developers should be rewarded for innovative and well considered design outcomes, not encouraged to 'tick boxes' and meet basic design requirements. At present we consider there to be no incentive to develop architecturally pleasing buildings along the corridor, particularly when considered with the lack of density that can be achieved under the framework. We further recommend that release of the revised City & Gateway Framework should be done simultaneously with a Draft Territory Plan Variation to minimise delays in implementation of the proposed controls. This will assist in providing consistency between the final framework and implementation of a Territory Plan Variation.
122	The City and urban gateway urban design framework provides opportunities to: • separate pedestrians from cyclists, and cyclists from motor vehicles; • improve the quality of public spaces; and • improve walking and vehicle flows, consistent with the Griffins' vision. We recommend considering creative ways to achieve the following objectives of the draft framework: • A people-first approach … Prioritise pedestrian movement and experience …pedestrian accessibility to and along the corridor … walkable street environments for all levels of ability … Intersections put people first … Clear passage for walking. • Encourage social interaction with human scale people-places and green spaces …places and areas of activity … places to rest and linger ... a forum for public life • improved east-west active travel connections (especially across Northbourne Avenue) • Adapt traffic speed to suit all street uses We attach a variation on the idea of reducing Northbourne road traffic to two lanes in both directions. **ATTACHMENT A - A variation to the road configuration, to optimise traffic flows and increase usable public space.** This approach replaces the traditional road-focused symmetrical avenue layout with a more playful avenue layout, that features roads on one side, the light rail line in the centre, and public spaces on the other side. **Pedestrian traffic** Placing both carriageways on one side of the avenue will allow people to cross the two carriageways in a single phase of the traffic signals. It avoids the current problem of people having to wait an extra ninety seconds on the median, because the pedestrian signals change to red during the extra fifteen to twenty seconds that it takes them to walk across the median. It will become practical for people to visit places across Northbourne Avenue during even a half-hour lunch break, without having to allow four extra minutes of extra time waiting at pedestrian signals.

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	Light rail traffic People walking to or from light rail stations will no longer have to wait at traffic signals, if they are on the side of Northbourne Avenue that is away from the road. If they must cross the road they will have a slightly longer walk between the footpath and the station. Their wait for pedestrian signals will be no different from the wait they face with the current layout. **Road traffic** The proposed layout will also improve vehicle flows. Traffic signals have to leave a few seconds of all-red time between phases, to allow for one set of vehicles to clear the intersection before the next set enters. This all-red time is two seconds at normal intersections. At intersections with wide medians, the all-red time has to be extended to four seconds. Co-locating the roadways will allow the all-red time to revert to two seconds per phase. This will increase the capacity of each intersection by about five per cent, with benefits to traffic flow and corresponding reductions in congestion delays. **Public spaces** Placing public spaces on one side of the avenue, rather than sandwiched between the noise, fumes and danger of two busy 60 km/h carriageways, will make them not only more pleasant but also more accessible. People will be able to buy a coffee at a sidewalk cafe, and carry it into the public space without having to dodge through several lanes of busy traffic. Even at peak times the light rail line will carry only one vehicle every three minutes. In the same period, each adjacent lane of road traffic will carry about sixty vehicles. The light rail line will provide an extra buffer between the public space and the general traffic.
123	My husband and I bought our place in [….] St 43 years ago, have raised 2 children here, have loved our time here and plan to see out our days here. Unfortunately Downer has lost a lot over the time we have lived here – a chemist, Doctor, supermarket, Indian and Chinese restaurants, butcher, Scout group and most importantly a Primary school. We had to fight to get a bus to take our children to Majura Primary, 2.5km away and I believe this no longer exists forcing children in our part of Downer to cross Northbourne – the busiest road in Canberra to get to Lyneham Primary. And until recently (with some aspects of the shops re-opening) there has been no improvement in facilities in the suburb. Recently the Downer Community Association, which manages the Downer Community Centre was also threatened by a massive rent increase. Fortunately this was resolved successfully. Now we are being threatened by 5 and 6 storey buildings along Northbourne Avenue, which will totally change our outlook, create overshadowing and increase traffic flow on our narrow streets. Page 29 of the Framework states that "Development will generally present a symmetrical built edge to both sides of the corridor", which is not possible as the opposite edge of Downer includes the Lyneham playing fields or are these to be built on too. This proposed change affects parts of Downer more than any other suburb in Canberra. How many apartments does Canberra need?? Why does the height have to be increased from the Downer section? At this point we don't know what is proposed for the Yowani and Kamberra sites. Why is there no overall plan that includes full information on all proposed developments? Downer already has a significant development on the old school site, which includes apartments. Many other residents share our concerns and should be considered when redevelopment is proposed.
124	Thank you for the opportunity to comment on the City and Gateway Draft Urban Design Framework. Many aspects of the framework are laudable, such as the intention to require excellence in sustainable architectural design, to encourage walking and cycling, and to incorporate vertical and roof gardens into buildings. These elements should not just be limited to Northbourne Avenue but should find a place in broader planning and building requirements for the whole of Canberra.

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	My main concern with the Framework is, however, the matters that the Framework does not deal with, or only deals with in a cursory manner. Principally, my concern is with the intention to reduce or discourage traffic on Northbourne Avenue. **Traffic issues** The current road classification hierarchy in the ACT consists of arterial roads, major collector roads, minor collector roads and access streets, as per on the Justice and Community Safety Directorate website. The design characteristics and traffic volumes for major collector roads, minor collector roads, and access streets can be found in Table 2A of the Estate Development Code of the Territory Plan. Northbourne Avenue is currently classified as an arterial road and serves as the primary road that carries traffic in the North/South direction through North Canberra. The Framework proposes to reclassify Northbourne Avenue from an arterial road to a transit corridor. It is stated that this new classification will be designed to give greater priority to pedestrians and cyclists as well as attempting to minimise commercial and private vehicle through-traffic. How this will be achieved is not clearly stated in the Framework but the suggestion is that lane reductions and reduced speed limits along Northbourne Avenue will be considered. Only one page of the framework (page 49) is dedicated to dealing with the massive changes to traffic flows that will occur as a result of the reclassification of Northbourne Avenue, and the information presented on this page raises more questions than it answers: *Classification of Cooyong Street, Miller Street, Majura Avenue and Cowper Street as distributor roads* Map 14 on page 49 classifies Cooyong Street, Miller Street, Majura Avenue and Cowper Street as distributor roads but nowhere in the Framework is there a description of what a distributor road is or what the implications of a distributor road classification are. These streets exhibit a wide variety of physical characteristics, with Cooyong Street being a triple lane 22m wide road, while Miller Street, Majura Avenue and Cowper Street are single lane 9m wide roads. Page 49 suggests that 'improvements' will need to be made to traffic routes in the Inner North to support traffic on routes other than Northbourne Avenue. Does this mean that Miller Street, Majura Avenue and Cowper Street will be widened to 22m? *Status of many roads in the Inner North left unclassified* Map 14 on page 49 leaves most of the roads in North Canberra unclassified. What is the effect of not classifying these roads? Inappropriate through-traffic on many residential and school roads has been an issue for decades in North Canberra and the Framework fails to even recognise this issue. The proposed reduction of traffic on Northbourne Avenue will inevitably exacerbate these issues and the Framework gives no indication as to how these issues will be controlled. *Changes to Vernon Circle* It appears from Map 14 that Vernon Circle has been reclassified from an arterial road to a distributor road, and the road connecting Vernon Circle to Commonwealth Avenue Bridge has either been removed or left as an unclassified road. The Framework makes no mention of what changes are proposed to be made to Vernon Circle or whether there will there be a direct route from Vernon Circle to Commonwealth Avenue Bridge. *Classification of Barry Drive, Constitution Avenue and Commonwealth Avenue Bridge as transit corridors* Map 14 shows that Barry Drive, Constitution Avenue and Commonwealth Avenue Bridge are proposed to be reclassified from arterial roads to transit corridors. There is no discussion of this in the Framework, but presumably this reclassification is intended to pave the way for a minimisation of through-

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	traffic on these routes in the same way that traffic is proposed to be minimised on Northbourne Avenue. Of course all of the traffic on Commonwealth Avenue Bridge is through-traffic and it is one of only two routes across Lake Burley Griffin. Minimisation of traffic on Commonwealth Avenue Bridge is a massive change that will impact traffic flows throughout Canberra. It is amazing that this would be proposed in the Framework with absolutely no discussion. *Proposed reduction of traffic on Northbourne Avenue* Suburbs around North Canberra in Gungahlin and Belconnen continue to develop and bring increased traffic pressure on Canberra's arterial road network. Page 49, however, states that through-traffic on Northbourne Avenue could be reduced by 50%. This figure raises a number of questions such as: what is the current proportion of through traffic on Northbourne Avenue? Is the 50% reduction from current levels or from traffic volumes expected to exist in 2030? What traffic level increase is expected from the proposed 30% increase in population of the Inner North and from the significantly increased density of commercial development in the Inner North? Even with optimistic rates of active travel and public transport use, where will all this additional traffic go? Without answers to the above questions and issues, it is not possible for anyone to provide meaningful feedback on the proposal presented in the Framework. Far more information is presented in a typical development proposal for a single development than has been presented for the proposals in this Framework which will have massive implications for transport throughout much of Canberra. **Framework implementation** The other main issue which is only discussed very briefly in the Framework is the implementation path for the Framework. The aspirational statements and ideas in the Framework need to be translated into enforceable rules and the rules need to be properly applied by planning authorities in providing development approvals. The developments then need to be properly monitored to ensure that they proceed in accordance with the approvals given. The recent decision of ACAT in *Sladic v ACTPLA* highlights significant shortfalls in these areas. Without institutional and cultural change in planning authorities there is little point in discussing new rules if current rules cannot be properly applied and enforced. **Green space** Finally I wish to make a comment about green space. The Framework proposes significantly increased density along Northbourne Avenue and in other areas of North Canberra and, while the Framework makes numerous references to 'the bush capital', 'urban forests', and 'garden city', it proposes absolutely no increase in dedicated green space. This planning process is the perfect opportunity to increase the greenery in the city centre and this greenery could be the focal point of the Northbourne Avenue redevelopment. For example, instead of 'landmark' buildings with alfresco dining overlooking 12 lanes of traffic at the Northbourne Avenue / MacArthur avenue intersection, these sites could be used for world class gardens that provide an inspirational focal point for both Canberra residents and visitors to Canberra. The gardens would provide a more gradual transition from the openness of the intersection to the surrounding built environment, they could be enjoyed by local residents and workers, and they would no doubt be admired by people transiting through one of the busiest intersections in Canberra. **Conclusion** While the Framework contains many commendable ideas, it fails to adequately acknowledge the negative consequences flowing from the redevelopment of Northbourne Avenue, and how these negative consequences will be addressed. Without a proper understanding of the full impacts of the proposed

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	redevelopment, the issues on Northbourne Avenue that this Framework is attempting to address will simply be transferred to other transport corridors. In other words, it is likely the improvements to Northbourne Avenue will come at the expense of the liveability, amenity and safety of other areas of North Canberra. I therefore cannot support the Framework in its current form.
125	Strategic planning for any city is a massive undertaking, and understandably so. But as we know, and would probably all agree, the national capital is no ordinary city. It is simultaneously the symbolic seat of a powerful central government, signalling and reflecting and setting out to articulate the democratic values of a wealthy modern multicultural Australian population, and home of every Territory resident and business. It is a flourishing tourism destination, a setting where high level deals are negotiated, within a region that exports tertiary education services (the nation's second largest export after mining) to domestic and international students in their hundreds of thousands and attracts the attention, to some degree envy, and inevitable criticism (and occasional praise) of every Australian. On top of all of that, it holds the title of being a world class liveable garden city. From a conceptual standpoint, this draft framework sets out a vision. It may be bold, it may be radical, it may be idealistic, but it encapsulates a vision. The question for the many communities that engage with this draft framework document, whether they be business, resident associations, community councils, non-government organisations, private citizens, industry bodies, any of a million community/sporting/cultural groups, tourism operators, political parties, is ***what does it all mean?*** Analysing and forecasting the likely impacts of any strategic planning vision take time. They take research and accurate data and clear communication. They require weighing up the what if scenarios and comparing those with what would likely be the case otherwise. And all of that starts with questions. Questions like: where will all the traffic go, where will all the shadows fall, where will children play, where will preschools be, will the existing schools be enlarged or will new schools be needed, how much noise and rubbish and effluent and all those other little untidy but daily parts of life that make up a city are we talking about here and how will all of that be staged and managed over the next 5, 10, 15, 20, 25+ years? And questions like what will it mean for land values, for rates, for the cost of living and rents and the wider ACT community's capacity to balance the budget and actually be able to afford to carry on living here? As a professional planner, I applaud the team who've put this together. I applaud the courage, the creative input, the commitment, the strong and consistent emphasis on design quality, and on real sustainability in the sense of catering to the many stages of life and seeking to nurture an energy efficient walkable urban environment that hosts a healthy mix of household types and sizes and income levels, including people with disabilities and special needs. I applaud the decision to take this out into the public eye and begin to listen. I trust that the next step in this process will be to gather together the comments and questions and undertake the essential analysis that underpins good planning, in order to respond fairly to the issues that consultation raises. What concerns me somewhat, at this point, is the scope and depth of engagement. To date, very few copies of the framework document have been printed off and despite public promises none appear to have been placed on exhibition in Dickson Library. This is arguably the most significant piece of planning work for Canberra since the Y Plan was released by the NCDC in 1970. Sadly the budget to execute engagement appears to be minimal, the City and Gateway team's resources are clearly stretched and the timeframe for engagement barely scratches the surface. That concerns me because the flow on effects of this conceptual work are huge, the need for independent thorough objective comprehensive analysis is abundant, but if the audience this is aimed at forms the view that it's been hoodwinked then the backlash could be unstoppable.

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	For my own part, I have a few qualms. Macarthur is a theoretical invention, not an actual place. It appears to consist of 4 quadrants taking in the corners of the intersection where the ABC Studios in Dickson address the multi-unit residential and commercial blocks on 3 opposing corners, separated by the heavy traffic flows on 2 major roads (Northbourne, and Macarthur/Wakefield). From an urban design perspective, marrying these 4 separate and distinct semi-suburban quadrants into an urban village so close to the adjacent Dickson urban village with any clear sense of place or cohesion will be extremely difficult. What seems far more likely is that this node will host a collection of 4 or more high-rise transit-oriented developments, whereas if it's to work as a new entity it will require either an underground plaza linking the corners, or a very unusual but exciting floating plaza up in the air. The further question of whether the federal government intends to sell off the ABC's valuable block for redevelopment is also pertinent. My other concern is that "urban village" describes a bundle of related planning and design objectives and has become an increasingly popular shorthand. What often happens in situations like this is the term rapidly degenerates into jargon for just another conventional mixed use precinct aimed at high income investors, with no distinctive identity and few long term occupants and little in the way of an integrated public realm. There will of course be demand for luxury apartments, but it's important to make sure that those do not overtly dominate and risk defining the perception of this city, or become gated communities that exclude and reject. The gap between rich and poor is alarming, and inclusive developments that are supportive of differences are needed here and throughout this city. Having said that, the City Renewal Authority (CRA) appears to be crafting a whole new agenda. From a resident/planner's perspective, I would have a great deal more confidence in the nascent urban village agenda if CRA were assigned full responsibility for a demonstration renewal project. That would give it as an organisation a chance to prove that it has the technical abilities, budget, nouse and necessary political backing, and an opportunity to test out and refine its theories. The No. 1 concern from a community standpoint that I am hearing is about diverting traffic from Northbourne onto surrounding arteries and connectors, and the danger of exacerbating congestion and producing rat-running, making local roads and intersections significantly less safe for motorists and pedestrians and cyclists, and far less efficient. I have also spoken to developers, and some of the city's most experienced players in the field have been saying that there's a conflict between the prices the government is seeking for government-owned blocks and the quality design rhetoric. What that suggests is that the profit margins big developers are looking for may not be achievable, and there will ultimately be a trade off. From my own perspective, the Sullivans Creek waterway and open space network promises to be an excellent initiative and is commendable. The future need for multi-purpose community facilities, diversity of open space types, safer cycling infrastructure and pedestrian paths, and other ways of combating the urban heat island and lowering transport-related emissions are also vitally important. Managing those issues to ensure that in the end the community as a whole benefits and the triple bottom line balances takes exceptional skill and talent. The concept of a design review panel that the draft framework refers to has been in the government's Statement of Planning Intent now for a few years. Actually setting it up and making it work, combining internationally respected designers and talented locals with on the ground experience, is neither cheap nor easy. These bodies are very expensive to run, and typically very difficult to coordinate. In practice, housing the requisite skills within the new City Renewal Authority and equipping it with the powers to undertake planning and development would give the ACT government an in-house resource that can transparently review plans and consider options much more carefully, referring major projects for external review as needed. The Sydney Cove Redevelopment Authority and Darling Harbour Authority are possible examples.

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126	**City and Gateway Draft Urban Design Framework** **Gateway:** Should reflect the garden city aspect of Canberra. This does not mean wall to wall buildings on both sides of Nortbourne Avenue. This is particularly relevant to the section between Antill Street and the Barton highway as this section is narrower than other sections of the gateway. A narrow concrete and glass canyon at this part of the gateway would not be attractive. Buildings should be of good design and should be interspaced with green spaces and trees. The prospect of another Flemington Road streetscape as Canberra's gateway would be totally unacceptable. **Northbourne:** Currently on Northbourne Avenue north of Antill Street there are 2 storey buildings. Consideration could be given to 3 or 4 storey buildings, but no higher. More than 4 storeys would disadvantage residents in the streets behind Northbourne Avenue (eg Blacket street) and lower the amenity of these residents. Again green spaces and trees should be part of any development . The proximity of any development to the light rail makes it ideal to include affordable and public housing. **Downer:** The suburb of Downer is changing. It is evolving as new residents move in and build family homes. It is subject to growth through plans for development at Kamberra Wines, Yowani and the former Downer school site. To a lesser extent the developments around Dickson shops (Nova and Malabar) will impact the suburb. Further proposed developments (section 72 Dickson) in that suburb will also impact on Downer. Urban development proposals should not be considered in isolation. There should be an overall plan for Downer. Rapid change and growth as proposed in the City and Gateway Draft Urban Design Framework will endanger the suburban garden character of the suburb. More importantly it threatens the existing strong sense of community that has been built over many years. **Streets behind Northbourne Avenue:** The suggested heights of buildings for Northbourne Avenue and streets backing it such as Blacket, Swinden, Atherton and Banfield lends itself to narrow , sunless places. The consolidation of current blocks would only exacerbate this problem. In the streets backing Northbourne Avenue the heights of new town houses are 2 storeys (eg Blacket street). This height could prevail as it is already part of change in the suburb. There is an opportunity for small clusters of single level town houses to be part of this development (eg Grayson Street in Hackett). This would allow ageing in place opportunities for current and new residents. It would also provide the best chance of maintaining the mature street trees. **Current Residents:** The draft document does not give adequate consideration to current residents: • long term residents do not want be displaced or rated out of the suburb • newer residents have invested in new family homes and do not want the value and amenity of these to be devalued. Necessary Inclusions; A number of important issues are not covered in the draft: • no plans for residents to age in place, • no proposed traffic surveys • no plans for improved infrastructure • no transition plans, and • no timelines. These issues should be included in the next draft of the Gateway strategy.

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	Final Comments; A recent article (Canberra Times3 May, 2018, page6); recently commented about Canberra as follows: "…many people mistake our open spaces and abundance of greenery for privilege, because that's what marks the suburbs of the wealthiest Sydneysiders and Melburnians. Here it is just a benefit of good planning." The City and Urban Gateway plan should maintain this important aspect of Canberra.
127	Thank you for allowing us the chance to provide feedback to the draft framework. Overall, I think it has many good ideas, and my main comments are below: • I live near MacArthur Ave, and whenever I hear the term 'urban village' I am sceptical as often there is not enough detail to define what this is. It is like this in the framework - not enough suggested planning guidelines (which is ironic give your definition of place making at the back of the framework). Many buildings which have shop fronts on northbourne are still for lease after several years - a clear failure. My suggestions would be that specific developers and architects with good track records of place making (e.g. Fender Katsalidis and Molongo Group) be engaged for these urban villages - not just any developer who wants to make the most money! So perhaps go out to tender to a number of these partnerships. Important is also to make sure they are embracing all users - families, renters, singles, elderly, etc • I live in a 2 bedroom apartment with my son and partner. We want to stay in this area, and moving to a 3 bedroom isn't easy - there aren't many around here that don't almost double in price to what we paid - they are aimed at the wealthy who want to live in luxury. More guidelines need to be made for developers - Art Group for example is about to start over 400 appartments and only about 15 will be three bedroom!!! More profitable for them, but does not support a diverse population in the area your indicating. Where is the affordable housing for families who are happy to live in an apartment with less space? As a family I also what the urban areas to take this into account - more playgrounds, child friendly places, etc shouldn't developers have to make a playground or shared garden to support families, elderly etc? And local supermarket so people aren't tempted to get into the car to get to the closest shop that's just a little to far to walk or ride to? • I love the suggestion of making Northbourne two lanes and one a bike lane! I think this would be amazing for our city. The dangerous path along northbourne is already used a lot, but this could make it so more vibrant, and encourage more to use. I myself would never take my young child in a bike seat on my bike along northbourne, however, with this I definitely would. It would help with the image of Canberra as well - something unique we can be proud of. Especially with more and more appartments this would encourage people to use bike riding as a safe and convenient way to get to the local cafe etc - and if the urban villages are done right - people would be encouraged to leave their cars at home to get to one. And it could encourage more people who live around me to ride to work - I know a lot who don't who live even as close as Braddon and work in the city and drive! A safe and fast bike path might be just the radical change they need to stop this behaviour. I hope the final frameworks gets incorporated into NCA guidelines as soon as possible - I am afraid of left long, it may be too late. So much of Northbourne has already been sold off and developers are allowed to have a lot of free range, including around MacArthur Avenue.
128	I am a landowner and past resident of Downer […..] so I live on the [……..]. I will call the part of Downer immediately adjacent to Northbourne Avenue 'NCA Downer' for lack of a better name. I attended the discussion evening at Downer Community Centre on 9 April and I thank ACTPLA and NCA very much for this opportunity.

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	The discussion document says "Changes to the planning controls for the Watson and Downer side of the Federal Highway are not proposed in the short term" page 22. However the impression I got from the meeting was that was no longer the case and, at least for Downer, change was proposed soon. My first comment is that if change is planned, it would be better to do it sooner rather than later. If you go to NCA Downer you will find that most of it is the original houses. I think that there has been something of a belief amongst my neigbours that planning rules would change and they should wait till then to redevelop. There have only been a few knock down rebuilds. If there is clarity as to the rules, then land owners will act appropriately. At the meeting it seemed that a large number of NCA Downer land owners were interested in selling there blocks in the near future. This was primarily landowners in NCA Downer but it also included adjacent land owners. My second comment is that any change needs to consider Downer, not just Northbourne Avenue. It is after all where people live not just pass thru.This means a consideration of: • traffic movements within Downer. The local foot paths need to be maintained and in some places foot paths need to be created. Clearly there will be a lot more residents in the area than planned and not all of them will catch the light rail. There needs to be studies of this, and in particular parking issues as it is possible that this area of Downer will become an informal park and ride for light rail patrons. • overshadowing, This could be an issue for exiting housing on the eastern side of NCA Downer past the Barton Highway intersection when Northbourne Avenue stops going due north. It will clearly be an issue for existing housing in NCA Downer and could be an issue for any new housing. • impact on trees and green space. The northern streets in particular in that area have wonderful street trees and they must be preserved as with the trees adjacent to Northbourne Avenue. There is some urban open space in the area along Northbourne Avenue and this should be maintained. • impact on character of the street. Clearly the streets are going to look very different with multi-unit apartments on the western sides and single story, single residence 1960's development on the other. This is an argument for some higher level development on the eastern side of the streets, although not necessarily the same level. At the workshop I attended there was a preference for 3 story development on the NCA side. If that was done, then 3 or 2 storey would be appropriate on the eastern side. I understand that the NCA is proposing 5 to 6 storey on its side. If so them probably the east side needs to go to 3 storey so as to appear reasonably balanced. My third comment is that given that the NCA and ACTPLA are planning substantial change to Downer, it is time to look at all of Downer and how to make Downer play its part in a more compact Canberra that uses the light rail to best advantage. I would like to see consideration of changing the zoning on the eastern side of the NCA Downer to a higher density. This would increase the population in the area that is within easy walking distance of a light rail stop and make better use of the light rail. It would also provide a more balanced streetscape. It would make much more sense than the current development of Downer which is centered on the old school site which is 1km from the light rail. I understand that the proposal for a 'marker building' at the Phillip Avenue, Northbourne Avenue intersection has been shelved. However I do support specific zoning very close to the light rail stops. Higher density development immediately adjacent to the light rail stop would make best use of it.
129	1. KEY ISSUES

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	Key issues arising from consideration of some broad matters follow, with links to further comment at Sections 2-7 in this submission. The City Gateway Draft Framework raises many concerns and matters that are not mentioned nor considered sufficiently, particularly in relation to the boulevard corridor section north of Antill Street, Dickson. Framework page references are in brackets. I Limited Vision 1. The Gateway vision appears predicated on the need for high density and quite tall buildings on both sides of the Northbourne Avenue/ Federal Highway section north of Antill Street as a significant part of the gateway to Canberra with a 'distinct character area' (p. 2), with 'strong visual cues' and enhancing the 'bush capital character' (p. 6) • the Gateway to Australia's National Capital is to be mainly old-fashioned ribbon development, with a strong focus on hard infrastructure and buildings, plus, in comparison, some minor improvements in landscaping and connectivity • no other options have been mentioned, nor timeframe requirements set to ensure, for example, that all quality landscaping occurs at the time of building or on completion. 2. Infrastructure not people – the Framework repeatedly claims that people are a priority in many of its aspects and principles, but the workability of this is weakened by a 'buildings at any cost' focus that is working around the major rail route, and not on the day-to-day needs of people living in and moving to and from the area, plus those who work or need to visit the area day or night • the wish to revitalise some areas north of Antill Street is seen as only possible with a considerable increase of population and tall residential infrastructure, however other options could be pursued (Section 2. II: Additional development behind the urban forest refers). 3. There is no indication what the ACT Government considers negotiable and non-negotiable 1) south of Antill Street 2) north of Antill Street No other options are offered to improve this latter section even more for locals, as opposed to incoming travellers (p. 20, travellers' focus refers) Questions about 2) in particular were asked at a public meeting on 9 April 2018 in Downer but were not answered by a table 'facilitator' (Section 4: Downer focus unjust and unsupported – questions and need for integrated plans provides more detail). 4. 'Symmetry' seems to be a chief justification for high rise development on the edge of a post-WW2 character suburb (Downer) yet symmetry can be achieved by other means • improved harmony of the section between Antill Street and the edge of Watson with the bush areas can be better achieved without up to six storey development on both sides of Northbourne Avenue/ Federal Highway

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	• Section 2: A different approach and reasons for this, outlines a graduated urban forest approach for this area, which is totally consistent with government actions taken to date and planned concerning its responsibilities for 'Canberra's urban forest' - a more harmonious approach both to the city's Gateway and to meeting local citizens' liveability needs is also possible via this option because it would not involve years and years of piecemeal building infrastructure development in Downer, pressure from developers, possible court cases, noise, major disruption and inconvenience for residents and visitors alike. 5. Traffic and parking impacts of more densification on suburban streets • far more information about analysis of increased parking and traffic on suburban streets over time (not designed for such impacts – eg Braddon, Downer, Dickson) needs to be shared with those living in affected areas • the suggestion (at Section 4: Downer focus unjust and unsupported – questions and need for integrated plans) that only, say, up to two freestanding villas per normal Downer block be built on the western sides of Atherton and Blacket Streets would ensure better traffic and parking impacts for those quiet loop streets - eastern Blacket Street already has only two-storey complexes with exits to more major streets nearby - the components of Atherton Street would have little scope to cope with more traffic and parking if bigger/higher complexes like the existing new ones on Antill, Blacket and Frencham Streets were built ▪ underground parking would need to be provided, but unless it is spacious and easy to access and use, cars end up on suburban streets, as has happened on Frencham Street (17 unit, two storey units refer) making it hard for other traffic to move safely up and down that street. • More comment on traffic and parking, concerning Downer in particular, is at Section 4: Downer focus unjust and unsupported – questions and need for integrated plans II Downer: 20-30 year timeframe unacceptable and unfair. 1. The brief public meeting on the Gateway impacts on at least western Downer on 9 April was informed of a 20-30 year timeframe for broad implementation • this timeframe was also stated by the Chief Planner a little earlier when discussing the ACT's 'Urban Renewal Strategy' (Canberra Times 3/3/18 refers) which is as yet unseen, and in which the Framework's planned redevelopment of Downer would surely feature in some detail • the Framework mentions a 2030+ vision (p. 5) without addressing mitigation of long-term implementation impacts on residents across the inner north, or how improvements to approaches decided upon might be addressed and taken up over time. 2. Despite the very long timeframe, the ACT Government's note to those who heard about the 9 April meeting in Downer recognised the need to 'minimise the impact on the existing character of the suburb' of the proposed changes concerning densification, height, etc.

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	• a 20-30 year timeframe with continuing 'uplift' and disruption will not assist a timely aesthetically pleasing completion of the Gateway entrance 'boulevard' or be welcomed by surrounding residents, especially those who wish to remain in their current homes until they are quite elderly • there are also likely to be major negative impacts on how Downer is viewed as a desirable location if it is constantly subjected development disruption and experiences the sort of delays that are already happening and detracting from the suburb's amenity and appearance (See Sections 3: Long timeframe concerns and 4: Downer focus unjust and unsupported – questions and need for integrated plans). Q1: Can the ACT Government advise the business case for, and the risks to valuing of other residents' assets via rates increases, as well as possible falling values in homes, in a suburb being subjected to long-term disruption, increasing street congestion and other Gateway development impacts which should be identified 1. across the full length of corridor implementation 2. for Downer? 3. While the Framework contains many laudable intents and guiding criteria, given past and current experiences, particularly in parts of the inner north, it is likely that the next seven or so ACT Governments may continue to be even slower at implementing a final Framework, especially in relation to improvements to areas adjacent to the corridor. 4. In addition, given many recent revelations about poor building quality in relatively new apartment complexes in Canberra, it is also hard to accept that corridor and nearby suburban buildings will 'maintain quality over time' (p. 29). No-one wants earlier complexes being demolished and rebuilt as later ones are being constructed at the end of the 30+ year timeframe. Q2: 'High quality' appears to be a key driver for the whole corridor, yet how will we be convinced that it will be applied to the changes in adjacent suburbs? Further comment on long timeframe impacts, including on Downer residents, is at Section 3. Long timeframe concerns. Section 2: A different approach and reasons for this, suggests an approach that would mitigate a number of issues arising for residents. III Inadequate reference to, and integration of, other ACT policies such as active travel and the ACT climate change adaptation strategy Active travel 1. The Framework makes much mention of prioritising people and supporting people flows especially at urban centres, suggests a few active travel routes (pp 37, 39) and focuses on ground level movement along the corridor ('ground level activation', p. 39) • the 'people first approach' (p. 44) underpins 'active travel' but the workability of the intents for walking and cycling (p. 45) depend on, and so require, far more concurrent and increased attention and application of the intents and criteria to a much larger neighbourhood and feeder area: Dickson Central, Dickson Section 72, Downer, Lyneham, Watson, at least.

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	2. Page 46 says 'active travel streets' are 'streets which are designed to make on-road cycling and walking safer', and seeks to have 'quieter side streets', support 'active travel' more • yet the Framework maps show 'active travel' occurring on heavily trafficked streets, such as Challis Street (a current 'rat run') in Dickson (p. 39) and ease of movement east of this street is not illustrated. 3. There are no active travel streets in Dickson that enable users to get quickly across the whole Dickson Central area and to the Dickson rail stop. All streets are heavily trafficked and this is likely to worsen with 224 new units on Cape Street about to be completed. 4. Section 7.1: Integration of other key ACT Government policies and strategies (eg active travel/healthy living, and Climate Change Adaptation Strategy) provides more comment on people movement needs and solutions. Q3: Is the Framework suggesting that increased safe 'active travel' for large numbers of people will occur on streets given over principally to these purposes, ie will vehicular traffic removed or be shared with safety barriers installed? ACT Climate Change Adaptation Strategy 5. This is not mentioned in the Framework although the latter indicates concerns about the impacts of extreme weather conditions along the corridor • the Framework refers to the negative impacts of 'heat sinks', 'heat island effects' and enduring 'heatwaves' (pp 15 & 27) and thus the need for more greening and shading through, for example, more trees on the corridor; and awnings and colonnades at street level: - awnings for the corridor receive many mentions but no design requirements are suggested concerning the adequacy of protection, or the means by which the many floors above will avoid becoming hot boxes (vertical vegetation is mentioned as one solution but curtains of hanging vegetation would probably assist a minority of windows, and are unlikely to be successful across large facades (see the Nishi building at NewActon)). 6. The Framework require buildings to be oriented 'towards the street' (p. 26). This is stated clearly as a high-level design principle (for a very long strip of buildings trapping heat because orientation towards the street means that their long axis is required to run north-south), in order to • promote life below at street level and improve public surveillance (p. 26) - the impacts on residents seem to receive little attention despite the Framework expecting buildings to respond better to our climate (of extremes, increasing climate change), and to provide passive heating and cooling to reduce residents' energy use (p. 27) 7. In the interests of sustainability and ameliorating rising costs for energy, far better siting and architectural design – eg shading above ground level – must be developed and applied across the whole area and especially in suburban contexts so that the effects of 'heat sinks' do not spread.

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	Q4: How will the aim to 'respond better to the Canberra climate' (p. 27) be achieved, given poor quality siting and orientation principles, no sun protection required for west-facing windows and poor sun access in winter for east-facing windows? 8. Poor orientation north along the corridor, so that travellers can catch 'glimpses' of buildings nearer to the beginning of the entrance way seems to counteract the climate change strategy and Framework objectives, and not put 'people first', ie lack of sufficient protection from harsh weather and road noise results. 9. In addition, no mention is made of solar energy generation and provision for the complexes, that is, how less costly energy might be provided to residents from the outset. Other means of renewable energy provision for apartments and the like are being developed elsewhere. Q5: Can solar panels be installed instead of roof-top gardens (p.27) or be installed nearby to help ensure 'low carbon living' and reduction in residents' living costs over time? Q6: Can the next iteration of the Framework include an appendix that cross-references key components and actions in the climate change strategy to objectives and design components for the Gateway corridor and surrounding areas and assess whether the strategy will be met adequately and consistently across all components and forms that make up the Gateway? 10. Section 7.1: Integration of other key ACT Government policies and strategies (eg active travel/healthy living and Climate Change Adaptation Strategy) raises more issues about protecting inner north residents and active travellers from our current and changing weather. IV Inadequate information about the Framework generally 11. It is difficult for the public to comment on the Framework document when it contains no index, no list of definitions, nor a glossary of key terms used in the text and on maps, eg 'active travel' • the final Framework should include these aids to assist public understanding • p. 46 says 'Active Travel Streets' are "streets which are designed to make on-road cycling and walking safer", and are limited to "quieter side streets"; the ACT's Active Living Principles State that 'active travel is a form of transport to deliberately get to a destination by walking or cycling or to access public transport'. There is no mention of how far people are expected to walk to rail stops and how they will be assisted by the creation of more direct pathways • there are no links to ACT Government policies on its 'Active Travel Strategy' and implementation to date on active travel. 12. Section 7.6: Inadequate basic consultation processes and information, more consultation required, also refers. 2. A different approach and reasons for this Given the issues and problems arising from the Draft Framework a different approach is suggested: • create a significant 'urban forest' from the eastern lead -in to the corridor, up to the Antill Street intersection

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	• develop behind that some residential housing, if necessary, that is more harmonious with and appropriate to adjacent suburban areas plus other public use facilities that will better service the area and many living outside it too.
	
	I Urban forest approach
	
	1. A dense and well-designed urban forest approach would create a visually pleasing bank of vegetation along the full entrance to Canberra, ie Federal Highway to Antill Street with sound reduction mounds or a wall on the inner sides able to be provided (as along the Cotter Road for Curtin residents, and in other cities on busy noisy roadways)
	  • such soundproofing is required and would not be seen from the corridor if behind a lot of vegetation and suitably camouflaged.
	2. Allowing swathes of tall trees and lower shrubbery to thrive on each side of Northbourne Avenue/ Federal Highway would address many issues and support key ACT policies. This would
	  • be 100% consistent with the ACT Government's years of support for and promotion of 'Canberra's urban forest', including efforts being made to expand and renew this forest (eg see documents such as reports and releases from the Office of the ACT Environment Commissioner, including ACT State of the Environment Reports)
	  • provide a high level of visual appeal –a far more pleasing ambience and introduction to the 'Bush Capital' than rows of tall, high density buildings on both sides of the road, with trees in front but still allowing glimpses of new high rise
	  • provide symmetry - the Framework's repeated expectation that symmetry is required between Antill Street and Philip Avenue (ie the reason for imposing taller buildings along this portion) would be met by tall vegetation with heights that could be scaled up towards the Antill Street intersection. This would be in keeping with higher buildings beyond the Antill Street intersection and provide some much needed softening of the intense, hard looking, built environment there
	  • by supporting the ACT's pride in being the 'Bush Capital', and in this way, key ACT Government policies regarding sustainability and climate change adaptation would also be met in more convincing ways
	  - the current Framework needs to address the requirements of the ACT Climate Change Adaptation Strategy, and a lot more trees, and fewer 'heat sinks' (buildings and associated hard surfaces) would assist this in a number of ways
	  - the focus in this part of the corridor would clearly be on a corridor of bush/vegetation and make a far more significant impact and recognise 'Canberra's unique landscape character' (p. 5)
	  - mass plantings have been well-received by Canberrans – see the Arboretum.
	3. Urban forest densification along the entrance to Canberra would help to
	  • reduce noise for residents along the corridor within Downer and in the adjacent outdoor facilities – noise comes not only from heavy incoming traffic, but also from very noisy events at EPIC (especially the two held in January when homes and apartments in Downer, Hackett and Watson are more opened up, day and night) Noise reduction after 25 years of intrusive noise over weekend periods would be appreciated by many

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	- building a long soundproofing wall or baffle behind the forest would therefore be far more feasible if vegetation densification occurred • enable both sides of Northbourne Avenue/ Federal Highway to be addressed as a whole in a relatively short space of time and so be visually pleasing at an earlier stage and be maintained to maximum effect from then on, with least interference from other changes and delay • retain ACT Government and NCA control of the appearance of the gateway, independent of the timing and nature of the developments behind it. Under this arrangement, the gateway would be maintained with a consistent image over time, with a predictable and affordable replacement/regeneration program to be executed by those with more control of its appearance than possible with the proposed building dominated gateway over decades of implementation • hide away any non-high quality commercial buildings already on the Federal Highway opposite Watson that are to remain, the like of which would not be seen on entering gateways to other cities • provide a wonderful active travel environment at ground level • a water system could be installed concurrently as protection against any fire in the future. 4. The lead-in on the Federal Highway at the northern end of a highly significant Gateway should not provide any views of 'chain retail' or other fairly ordinary buildings which focus on commercial enterprises – these are the antithesis of the quality design structure discussed in the Framework. 5. Existing buildings on the highway opposite Watson, eg the combined McDonalds/Caltex service station and the large Canberra Park student hostelry, have never presented an aesthetically pleasing façade • the apparent failure of both planners and owners concerning the establishment of the Canberra Park student hostelry (corner of Federal Highway and Well Station Road) to ensure investment in significant softening plantings and other quality landscaping creates a large, stark, authoritarian image • such architectural creations should not be visible in a significant Gateway to the National Capital because neither building nor landscaping promotes the desired 'bush capital' image • if such current commercial enterprises remain, screened by a thick urban forest, they could be supported by sympathetically designed signage. 6. A Gateway with an urban forest lead-up would be a more visually pleasing, impressive, harmonious entrance created with least disruption and visual dissonance to locals and visitors alike • any changes over time to the built environment behind this urban forest and essential soundproofing would not have to be rushed, especially at the planning stages (the current process seems very rushed to get to a building construction stage in parts of the corridor north of Antill Street) • the urban forest approach would enable a fully integrated plan and its holistic interpretation for the adjacent suburbs, their needs and uses to be developed, ensuring these suburbs are kept as more attractive locations for current and future permanent residents; ie avoid this

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	'suburban' part of the corridor becoming a potentially disruptive Airbnb corridor or one for more transient residents, that impinges on residents on otherwise quiet loop streets, and does not necessarily interact with the local community. II Additional development behind the urban forest 1. Any redevelopment can be more sympathetic to the immediate area behind an urban forest; ie it does not have to provide lead-in symmetry to the denser parts of Northbourne to the south • quite different uses and height can then be envisaged, eg up to two storey freestanding high quality villas if necessary along the western sides of Blacket, Atherton, and Banfield Streets, with substantial set-backs and room for quality landscaping and pathways and architectural design features that fit the character of the suburbs (eaves, roof design, etc) • well-designed cultural institutions of varying height and more sporting facilities on the Lyneham side can be included and accessed easily. If Yowani golf course keeps the current unsightly car park as it is now it won't impact negatively on a Gateway's emerging new 'whole' appearance, if hidden from view • the current B&Bs on the western edge of Downer could be replaced by more modern and better sited freestanding two storey temporary accommodation buildings: they do not have to be anything like 6 storeys to be attractive to users • if Yowani wishes to give over land for redevelopment on its Northbourne Avenue frontage, other public active health promotion or community cultural facilities should be developed there - to service the planned growing population along the whole corridor - ensure more use of the Swinden Street rail stops day and night by those living outside and in the area - directly complement the public use and sporting focus of the large abutting precinct that stretches to Gininderra Drive - to retain public amenity in the Dickson/Downer/Lyneham area: a lot of community/public space has already been lost to forms of residential development • the above approach could also ensure that the design and look of Flemington Road is not replicated north of Antill Street. The quickly-called meeting in Downer of 100 residents on 9 April made it clear: another Flemington Road was not wanted at all; and neither were the architectural examples shown as possible 'infill' solutions to Downer's western edge (and presumable Lyneham's eastern one in due course – which will occur according to the Draft Framework and the meeting). 3. Long timeframe concerns I Timeframe issues – avoiding years of transitional urban and suburban disruption and ugliness for a Gateway and Downer 1. Given the importance of achieving a visually pleasing and appropriate boulevard, any plans for any degree of encroachment on Downer – or any other suburban area abutting development along Northbourne Avenue/ Federal Highway – must include clear strategies to avoid subjecting locals and newcomers and those passing through to two or three decades of transitional urban ugliness and other impacts on liveability.

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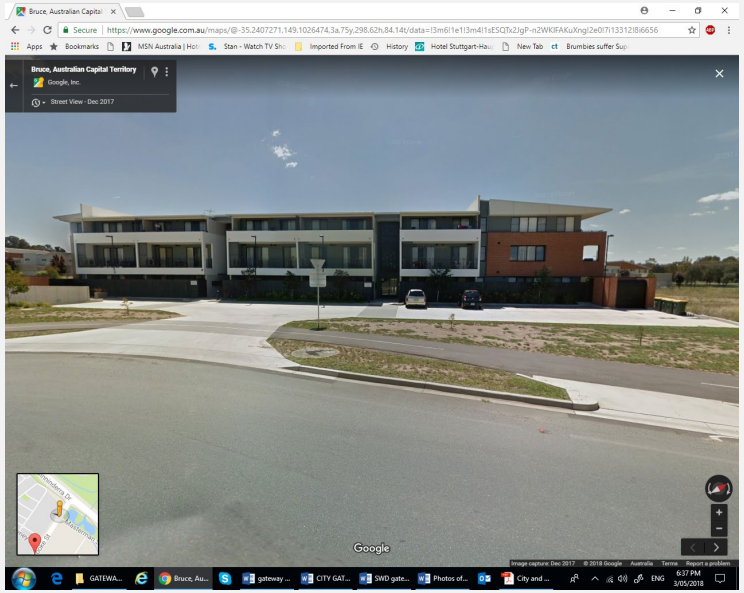
	2. The very long Framework timeframe means nearly half a person's lifetime of increasing urban ugliness and tattiness for locals and visitors alike. Observe past and current developments which have produced long-lasing eyesores even after 'completion' due to • non-completion of the expected quality landscaping, tree planting, or any harmonisation with the surrounding developed area, let alone broad principles of greening, improved urban amenity etc, and/or • extreme slowness in making any progress • the ACT's recent history of delivering poor visual amenity during and after new high-rise built environments have been created is very evident and should be addressed as a key part of the Gateway's implementation program. 3. Some examples: • Northern Braybrooke Street, Bruce: poor siting permitted plus no final substantial landscaping or softening outside the east-west oriented apartment block, just many dirt patches, concrete, weeds and parked cars for years so far.  December 2017 • Marcus Clarke Street/Barry Drive corner: Acton is another long-term eyesore where the promised conjunction of 'Town meets Gown' (arrangements finalised 13 years ago: Canberra Times, 14 May 2005), has not been completed satisfactorily - many high-rise buildings were quick to be erected, and cars parked in all directions. The northern area of this locality now lacks any quality, significant landscaping. This area is a blight on the CBD and the capacity of the planners, owners and developers to ensure satisfactory completion or sign-off on areas that include use of public space.

No.	Submission
	 Lena Karmel Lodge: opened January 2012

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	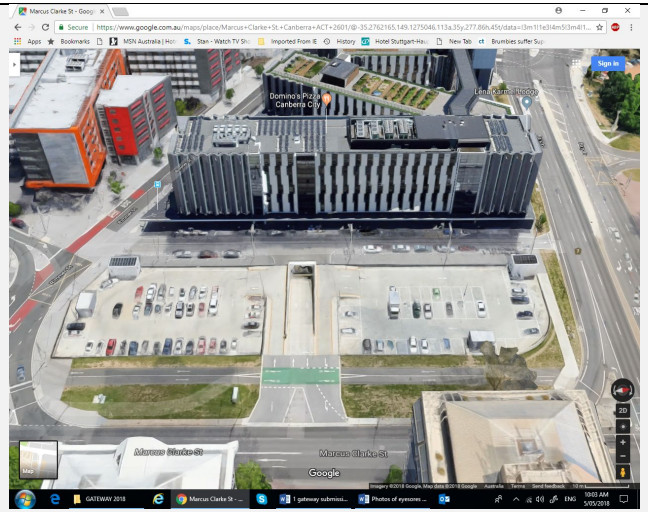 The view from the adjacent high-rise is an ugly wasteland and the nearby bike-path has no landscaping or integrated shading. ➢ This suggests that planning commitment to 'high quality' may drop off very quickly for areas away from the verges of the Gateway corridor. • Watson shops: the former petrol station block has been derelict and ugly for a decade, with screening now very tatty and not replaced, with dirt piles created every year or so.

No.	Submission
	 Watson service station: September 2008

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	 Watson service station: December 2017 • Downer Central (site of old school demolished mid-2014, redevelopment officially launched 30 September 2015) is still a scrappy wasteland that may remain that way, in part, for many more years with ugly layers of rusty old and new security fencing surrounds. A slow 'staged' development is now likely which will impact negatively on the large surrounding area and those who take up residence at the end of the first stage of development.

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	 Key December 2017 4. The Downer Central redevelopment has already taken up years of residents' consideration and input to secure basic improvements and now it appears that slow staged construction will occur (over how many years?). The result has been • loss of a large area of publicly utilised accessible space, followed by • rapid creation of a semi-permanent wasteland in the central area, parts of which may now last for years and early newcomers will view this on a daily basis • the required links for increased foot traffic and cyclists across the suburb to rail stops and to and from the Central development to the Swinden Street rail stop have not been developed by planners (Section 7.2: Linkages in and across Dickson and Downer for pedestrians and cyclists refers). 5. In addition, the Framework assumes that homes (old and new) on the western side of Downer (Atherton, Banfield and Blacket streets) are redundant assets. • they are not • nor are they public assets ripe for demolition • increasingly, new or renovated houses have appeared in these streets

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	• replacement over a proposed 20-30 year timeframe (9 April Downer meeting refers), due to no forced 'uplift' of residents, as advised at the 9 April meeting, is highly problematical for those who wish to stay for various reasons, including the governmental encouraged 'ageing in place'. (See also Section 4 Downer focus unjust and unsupported – questions and need for integrated plans) • various impacts on these quiet loop streets and the rest of the suburb, its residents' rates, and the character of the suburb, have not been addressed in any way either during the changing of the landscape or after the new environment would be in place • this is highly concerning since it contradicts the ACT Government's key approach to 'urban renewal' and the Framework, which is about 'prioritising people' and 'minimise[ing] the impact on existing suburbs'. (ACT Government note distributed to Downer residents before 9 April meeting refers) - Section 4: Downer focus unjust and unsupported – questions and need for integrated plans, addresses these contradictions in more detail. There is much to be documented (explained and illustrated) regarding impacts across Downer before the Framework is finalised. 6. Related to this are the major problems and issues concerning infill of our urban space with poorly constructed apartment complexes across Canberra. If not addressed effectively by major reform of the ACT Government's compliance and inspection processes, and remedied adequately, this will also have serious implications during the long implementation period for citizens living across from or near to developments along the Northbourne Avenue/Federal Highway corridor, and those taking on new residences • with a 20-30 year timeframe, current standards and processes, buildings constructed early in the implementation period will need to be demolished and development started again. This will be great for private developers but not for those who invested in the buildings or for the surrounding residents possibly living out their lives with uncertainty in terms of negative inputs and impacts, and possible growing reputational damage to the broader suburbs, ie 'I wouldn't want to live there' • high quality design, siting and construction, etc is required even for two-storey limited villa developments within Downer, with easy access to green areas or parks for new residents (See also Section 7.3: High quality public spaces for Dickson and Downer) • unless the above issues are addressed effectively, a good population mix will not be attracted to new developments: downsizers in particular will be assessing personal financial risk or finding that there are few suitable choices on offer for them in the new environment. See also Section 7.5: Community facilities, employment hubs and the mature aged – major roles. Q7: How will all the 'high quality' principles and objectives in the Framework be met by successive governments and political parties who may not prioritise government responsibility for overseeing and ensuring quality implementation, finalisation and remediation by the private sector? 7. Need for action and results in a shorter time • a long timeframe not only suggests a high ability for any ACT government to 'pass the buck' into the future, with all the attendant emerging problems attached, ie costs to residents, lack of clarity, changing goal-posts, liveability issues and more delays

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	• it also suggests a lack of funding, and therefore control, to make a better job of the Gateway plan and start and finish within a shorter length of time • a cheaper and less disruptive option with fewer discordant stages over a shorter period of time is therefore suggested at 2: A Different Approach (above). This would - reduce negative continuing impacts on existing and new residents and users of the boulevard from Antill Street northwards in particular since this component is far less 'fleshed out' in the Framework currently, and - provide a far more visually pleasing and significant looking Gateway in a shorter time. 9. In addition, good visual barriers are required for all future re-developments in Dickson and the surrounding areas and along other parts of the Gateway corridor – quality screening should be the minimum standard, not like the rail corridor's inadequate and quick-to-turn-to-tatters screening. (See, for example, Sydney's George Street screening) • the liveability of the areas affected and those passing through deserve an improved visual environment during any long period of constant development. 4. Focus on Downer unjust and unsupported – questions and need for integrated plans I The focus on medium-high rise within established suburbs Q8: In relation to Downer, what other suburbs have had such an addition of medium-high density development proposed and built, backing onto and along quiet loop streets? 1. The only reason given in the Framework for high densified building complexes on suburban single-storey loop streets (Downer) is the need for buildings along the corridor entrance to be stepped up in height towards the very tall high-rise currently starting at the Antill Street/Northbourne Avenue intersection • this is not a sufficient or fair reason, particularly for a corridor which aims to 'put people first' (p. 44), or in view of how other established suburbs have been redeveloped • and the existing homes in these areas are not derelict or redundant public assets (see Section 3: Long timeframe concerns, point 5) • the Framework therefore suggests that Downer and its residents will bear costs disproportionate to other suburbs - major intensification, eg on edges of major roads, in Weston and Deakin have been limited to two storeys. Medium density development to date along the Downer side of Antill Street, and on one end of the quiet loop streets identified for greater intensification to the west – Blacket Street – has been limited on both sides to two storeys (including, it would appear, units with high ceilings) - two storey complexes abound in suburban Braddon and along the Federal Highway end of the corridor at Watson - three storey complexes next to the Chifley shops are set well back from a wide, busy multi-laned street, and back on to a large expanse of park and oval space

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	▪ these examples illustrate that forcing more than two storey development on and around loop streets in an established garden suburb appears unprecedented and grasping, unfairly forcing Downer to 'pay' in more ways than others for the light rail. 2. Increased traffic and overflow parking would impact negatively on these Downer loop streets if rows of large six and four storey complexes were built there • even if limited to two storeys, parking from multi-unit complexes with underground parking have caused continuing street use problems, for example in Frencham Street, Downer - underground parking does not necessarily remove parked cars from the streets if the parking facility is not easy to access, spacious, or several cars belong to one unit, or it is easier to unload things at street level. See also Section 5: Insufficient focus on workability and quality of the wider Dickson precinct • visitors to residents and delivery services on these streets also need to be able to find a park at any time of the day for short periods • nobody wants these streets to end up looking like semi-permanent car yards because cars are parked on both sides of the street for most of the day and the night, impeding use by other cars and also bikes which need to be able to move easily and safely up and down the streets. This is often not possible in Frencham Street - this is not a desired impact on Downer's character to the west or in the central area. 3. Minimising impacts on suburb character • there is no evidence in the Framework, or offered at the Downer community meeting on 9 April, on how introducing six and four storey buildings on and behind quiet suburban loop streets in Downer would be managed by 'planning requirements' to 'minimise the impact on the existing character of the suburbs' (March 2018 notice of community meeting refers). • residents need to have their faith restored that any redevelopment across Downer and adjacent suburbs undertakings would be realised with the public interest at the forefront and with plans appropriate to site and of 'high quality' - Downer residents and many others in the area are acutely aware that several plan iterations for the proposed multi-storey development at Dickson shops was rejected by the ACT planners but then approved by them despite 65 potential breaches of the planning codes, - in addition, Downer residents are still faced with a growing wasteland in central Downer after years of community input to try to improve the quality of the basic design and siting of the major development mooted for that previous public use space (Section 3: Long timeframe concerns, points 3 and 5 refer). • the proposed four storey buildings on Downer's loop streets are justified in the Framework as providing a stepped 'interface' to the existing lower density residential areas opposite them (and from a much higher six storey mass behind). Such an interface is inappropriate and inadequate in terms of minimising impacts on the existing surrounds - two rows of two storey freestanding villas that are well sited, insulated, and soundproofed on the Downer streets and behind the street -facing villas (ie 2 rows of same height buildings in the southern part this area) with large rear courtyards, and good set-backs

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	would be a far more appropriate 'interface' and of a maximum height in keeping with what has been and is happening elsewhere in similar suburban precincts. This limit and style would also enable - tree and substantial landscaping that is more in harmony with the rest of the streets (ie on the blocks) and - attraction of families and downsizers to the area who would not find high-rise apartment complexes suitable for their needs. (Section 7.5: Community facilities, employment hubs and the mature aged – major roles, refers) • a caveat concerning possible maximum two storeys in Downer streets: retain the status quo - if a maximum of one or two two storey free-standing villas was allowed on the western sides of these Downer streets, no existing residents who wished to remain long-term in their existing homes should be forced to tolerate two storeyed buildings and attendant impacts on two or even three sides of their block over time - this may require retention of the status quo, ie retention of normal housing blocks for residences as now should be considered as the appropriate 'people first' solution in the final Framework. NOTE: Information available is still little and unclear (see Section 7.6: Inadequate basic consultation processes and information, more consultation required on the proposed block use for rows of multi-storeyed buildings and predictable growth in traffic problems.) 4. Consideration of the long timeframe, long term potential disruption, and 'blocking out' around existing residents who wish to remain suggests that Downer's western streets should remain as they are, and should not be overshadowed by even one row of multi-storeyed buildings at the rear. 5. More relevant questions Q 9: Where else in recent years in Canberra have three-four and six storey complexes been allowed to be built on one side of minor loop suburban streets, with single storey homes opposite, and requiring the demolition of recently built/upgraded homes? Q 10: For the next 10 years, what other ACT suburbs are identified for more than two storey development along internal loop streets, facing established homes and requiring significant demolition of existing older and new homes over a 20-30 year period? (See also Section 3 above: Long timeframe concerns) Q11: Will the soon to be released ACT Urban Renewal Strategy make clear what other ACT suburbs are identified for more than two storey development and in which streets? Q 12: What experience has the ACT Government – and developers – had of managing this specific type of suburban redevelopment within such a long timeframe? Q 13: What 'people' issues have arisen? Q 14: How were they swiftly and satisfactorily resolved? Q 15: What are the new issues foreseen for Downer? Q 16: How many years will Downer be subjected to major ongoing disruption from redevelopment and construction from any new suburban rezoning and consequent development along its streets? (See also Section 3: Long timeframe concerns.)

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	Q 17: How will the ACT Government ensure it takes full responsibility for, and maintains oversight and swift problem-solving for any tranche of Downer Gateway-related development over the next 20-30 years? Q 18: How will the ACT Government ensure high standards of development are introduced and managed (plus compliance and inspection processes) over the 30 year development period given the well-reported problems and difficulties with the current processes in many parts of Canberra in recent years, particularly in relation to urban infill? (See Canberra Times 3 March 2018: 'Strong MBA concerns and court cases of many apartment-living residents'). Q19: Will the soon to be released ACT Urban Renewal Strategy address the issues raised in questions 8-18 and offer solutions and assurances of strong remedial action via improved processes? 5. Insufficient focus on workability and quality of the wider Dickson precinct 1. Compared to the southern part of the boulevard corridor there seems to be far less attention paid to the improvement of the current landscapes and built environment and meeting 'people' needs in and around the Dickson/Downer/Lyneham corridor area • the application of high level aims and principles outlined in the Framework (pp 1-3) and in each un-numbered Framework section appears far more superficial, with many 'unknowns'. It is therefore deficient in terms of ensuring quality design and planning, improved linkages and landscaping, and ease of movement for pedestrians, cyclists and vehicular traffic alike in this important northern portion of the corridor and its existing residential, commercial and public space areas • the assurances about striving for 'high quality' seem to fall away beyond the building mass suggested along the corridor. 2. The needs of the Dickson Central area (aka Group Centre) receive superficial attention (eg see maps and diagrams on pp 43-46) without solving the current traffic and people movement problems or improving the visual and retail attractiveness of the area, let alone ensuring how it will cope from a 'people/user' perspective, with the current increases in population in the precinct, and the planned massive increase in the feeder population in the adjacent areas • this core area provides essential professional and public services to many suburbs east, north and west of Dickson – if allowed to be continually disrupted and run down, those services will be lost (see Section 7.3 High quality public spaces for Dickson and Downer for some of the losses to date) • poor connectedness and congestion issues and the rising barrier of the rail route is already driving O'Connor users away – they are tending to shop at other centres, eg Hawker, and intend to do so even more 'post-rail' (source: knowledge from personal contact with people reviewing their habits) • and more large tree plantings and improvements to street-scaping are required across the whole precinct to provide shade for pedestrians and vastly improve the visual attractiveness of the area, plus complement and link to the 'bush capital' component of the boulevard corridor a little further north.

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	3. The 'wholeness' of the Dickson precinct - ie from Northbourne Avenue to Cowper Street to Hawdon Place – is also superficially addressed in the Framework • despite the rush to create large unit complexes with street level retail and other outlets along Northbourne Avenue from Antill Street to the Dickson Interchange, the, connectivity of and impacts on the existing Dickson Central area to the new Dickson 'urban hub' on Northbourne Avenue has been hardly addressed • there are no quick, easy and comfortable access ways marked between the Dickson Northbourne 'hub' and the Central area. Negotiating these busy streets currently is off-putting, slow, and too exposed - some street areas in the precinct need to be closed to all except foot, cycle and bus traffic - Section 6: Traffic flows and connectedness addresses related issues for the Northbourne Avenue/Antill Street intersection. 4. Early and strong concurrent revitalisation is needed for the Dickson Central area, with the ability to offer more quality outlets and services to promote a variety of uses and not just have it principally a supermarket 'stop-off' • the Dickson Central area does not require one or even two more supermarkets squashed on to a small footprint near Woolworths and be so close to each other, as might be feasible in large shopping malls, or much larger shopping precincts with less internal congestion and more people and traffic movement space • one extra supermarket could be developed further away, eg eastern Section 72, to solve the many problems associated with the poor quality proposal that was recently rejected by ACAT on 65 planning grounds • more quality shopping – offering what supermarkets increasingly do not – and public use facilities to complement the library, should be planned for Dickson Central • movement of people in and across the area requires improvement including safe and direct pathways for shopping trolley users eg to the Dickson rail stop - a trolley park and coin retrieval machine needs to be provided at the Dickson Interchange • comment at Sections 7.2: Linkages in and across Dickson and Downer for pedestrians and cyclists and 7.4: Poor east-west boulevard linkages; underground access and flow required, also refer to connectedness and people movement issues affecting Dickson and other areas surrounding the Gateway. 5. A large amount of free parking (as now) needs to be retained on Saturday afternoons, Sundays and evenings in the Dickson Central area, plus time limited free parking on the eastern edge and inside of Section 72 to assist with the use of facilities there, particularly for swimming pool users in the summer • Dickson Central area users incur parking costs not required at other major suburban Canberra shopping centres: additional costs and constraints should not be borne by users of the Central area once the rail operates and the boulevard develops more. 6. The Central area has been poorly treated and maintained (like the suburban hubs around it) for many years, compared with others across Canberra • the 'bandaid' approaches and solutions currently in the Framework are inadequate to - cope with the high degree of development occurring and to occur nearby

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	- improve the amenity, landscaping, active travelling shade cover and attractiveness of the area, and not relegating it to being a 'quick stop' and 'let's get out of here' utilitarian environment - address increasing traffic congestion (see Section 7.4: Poor east-west boulevard linkages; underground access and flow required, on the growth of too many traffic lights and intersections). 7. In addition, the wider Dickson precinct is not supported by active health promotion inclusions such as public parks, cultural and other facilities, yet these are: • a key component of the boulevard's vision (eg pp 1-3), since large localised increases in population are planned for, and are • addressed for boulevard areas closer to Civic. 8. Community gardens are mentioned generally (p. 52) and should also be included in the footprint of all new complexes built between Antill Street and the Dickson Interchange (with good sun aspect): it is not too late to plan for these in this area, preferably at ground level. They need to planned with appropriate access to water and security • these gardens would help develop a sense of community along the corridor, encourage healthy eating, and encourage opportunities for interaction with keen gardeners in adjacent suburbs. 9. Comment at the following also refers to improvements needed for the wider Dickson precinct as an integral part of the Framework 6. Traffic flows and connectedness 7.1: Integration of other key ACT Government policies and strategies (eg active travel/healthy living and Climate Change Adaptation Strategy) 7.2: Linkages in and across Dickson and Downer for pedestrians and cyclists 7.3: High quality public spaces for Dickson and Downer 7.4: Poor east-west boulevard linkages; underground access and flow required 6. Traffic flows and connectedness 1. It is quite unclear how current streets and roads will continue to work effectively according to the maps on pp 43-47, especially after thousands more pedestrians, cyclists, and car drivers living in the area will intersect with the current vehicular 'rat runs' around the Dickson Central precinct • active travel streets on the east and west of the boulevard corridor near the Antill Street/Mouat Street/Northbourne Avenue intersection do not link up at all • further comment at Section 7.4: Poor east-west boulevard linkages; underground access and flow required, focuses on poor east-west boulevard linkages across the corridor and the need for improved connectivity across the corridor • in addition, vehicular traffic entering Mouat Street from this major corridor intersection still needs to slow to one lane each way to cross the nearby north-south Lyneham 'drain' – the bank-up of cars on this still-crooked road is worsening and becoming dangerous for those crossing at the Antill Street/Northbourne Avenue intersection.

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	Q20: Will all buses crossing the corridor, especially at the Antill Street–Mouat Street/ Northbourne Avenue intersection receive priority at the lights so that bus users do not miss connections to the rail and other buses, and likewise will buses heading west along Mouat Street not be delayed in reaching their destination? 2. There is a need to better service and take pressure off heavily parked-on suburban streets through active travel-coordinated link-ups across suburbs, including direct links through to rail stops • for example, the Australian Catholic University (ACU) at Watson (2km from Northbourne Avenue) has hundreds of cars parked on-site and in surrounding streets on week days, including in Downer (Phillip Ave - improved linkages are needed between new and existing cycle-ways, then the rail stops at Dickson and the top of Downer might be used more by ACU students and encourage them to consider active travel more during the week - the same applies to Daramalan students: good pathways that give more direct access to the Dickson Interchange stop, less than a kilometre away on foot or by bike, is required, also across the Section 72 area to eastern suburban areas. 3. In addition to what is needed to accompany the development of the Gateway, improved connectedness across suburbs adjacent to the rail route has not yet been resolved for the start-up of the light rail, for example across Downer • see comment and suggestions for improvement at Sections 1 III: Inadequate reference to, and integration of, other ACT policies such as the ACT climate change adaptation strategy; 1 IV: Inadequate information about the Framework generally; 7.1: Integration of other key ACT Government policies and strategies (eg active travel/healthy living and Climate Change Adaptation Strategy); 7.2: Linkages in and across Dickson and Downer for pedestrians and cyclists and 7.4: Poor east-west boulevard linkages; underground access and flow required. Q21: Which active travel routes marked on the maps will be established or upgraded in time for use when the light rail commences operation in late 2018 and when will the remainder be in place? Q22: When will the other active travel routes and feeder linkages arising from the framework be in place? 7. Other Gateway issues that deserve attention 7.1 Integration of other key ACT Government policies and strategies (eg active travel/healthy living, and Climate Change Adaptation Strategy) Active travel • Given the large increase in population envisaged along and around the corridor in future years (even without such tall and high density buildings between Antill Street and Philip Avenue), it is essential that far more people of all ages be encouraged to, and be able to adopt 'active travel', as described in the ACT Government's 'Active living principles' document (there is only one description about active travel streets in the Framework, at p. 46) - 'active travel is a form of transport to deliberately get to a destination by walking or cycling or to access public transport' (ACT Active Living Principles)

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	- also active travel means a mode of transport which involves physical activity such as walking and riding a bike to get from one destination to another (Transport Canberra: Active Travel website). • The current active travel (AT) routes shown on Framework maps, especially for the Dickson/Downer/Lyneham precinct are hardly encouraging for many reasons (see comment at Sections 7.2: Linkages in and across Dickson and Downer for pedestrians and cyclists, and 7.4: Poor east-west boulevard linkages; underground access and flow required) • The AT routes do not address how AT users will cross the precinct or corridor easily, including getting to and from rail stops quickly across suburbs and with few delays (especially on a bike), and without delays at major intersections. • The need for improvements is discussed at Sections 7.2 and 7.4 - if AT routes follow 'rat run' roads, physical barriers between bike paths and vehicular traffic should be installed to enable cyclists to get from A to B more efficiently and safely, the bike paths there would be better used (the 1.5m rule is inadequate for many cyclists and off-putting - see how well bike traffic separation is done in Auckland, NZ) - the same needs to be done along Northbourne Avenue – more direct access to the CBD and the ability to stop off along the way makes the cycle way here a major beneficial component of the corridor - see also Sections 1 III: Inadequate reference to, and integration of, other ACT policies such as the ACT climate change adaptation strategy; 1 IV: Inadequate information about the Framework generally. Toilets, seating and water: public health provisions • Active living/travel, that is, more walking, cycling, ground level 'people activation', and public transport use by all ages and families along the whole corridor and in and out of adjacent suburbs, calls for access to many clean and welcoming public toilets complexes along and near the corridor, as well as seating and water refill stations - yet toilets – a clear 'people first' support mechanism – are mentioned only once in passing as an inclusion, not as a necessary or high quality one (p. 57, Spaces for Play) - the same applies to seating for rest, and restful areas (one mention of seating on p. 57) ▪ if on foot, especially, no-one should have to pay $5.00 for a coffee to gain access to water, toilets or seating, and not walk 500m to the nearest public toilet ▪ this is particularly important for parents with children, older Canberrans, and people with disabilities, and anyone visiting the area for short periods ▪ water refill stations are not mentioned but, in line with ACT Government policies, they will also be needed, particularly at all 'urban hubs'. Q23: Where will public seating, toilets, rest areas and water refill stations be provided along the corridor and in adjacent areas? Q24: Who is responsible for providing easy public toilet access along the whole corridor and ensuring ongoing cleaning of a satisfactory quality?

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	ACT Climate Change Adaptation Strategy • There is no reference in the Framework as to how planners have addressed all the main actions set down for past and future years in this strategy, nor how they will in the future, to ensure that risk management and impacts of climate change have been addressed across all components of the rebuilt corridor environment - there is no indication in the Framework that all infrastructure, building and siting requirements will meet the needs arising from climate impacts, or satisfy the actions identified to mitigate negative impacts of climate change, attendant urban heat, in order to provide improved amenity and ability to use the corridor successfully over many decades. • As to the Gateway, a different approach would better meet the climate strategy's goals in relation to offsetting increasing 'urban heat' arising from intensified man-made environments along the corridor - a 'people first' approach should be complemented by a clear 'climate second' approach for the Gateway - the corridor development overall provides an excellent opportunity for the ACT Government to raise construction standards not only for buildings (new and existing) along the corridor (especially at the 'urban edges' – see the Climate Change Strategy Assessment, Section 3) but also infrastructure used by pedestrians and cyclists, for example: ▪ far more canopy cover/shade from more trees along walkways. The Framework suggests that this will be done, but there is no evidence that it will not result in piecemeal, unsatisfactory outcomes already seen in other areas. If application or remediation is piecemeal and inadequate, possibly for decades, corridor and adjacent suburbs will not be at all pleasant in the extremes of temperature experienced in Canberra across the seasons. The lack of protection from the elements will deter active travellers in particular ▪ large man-made canopy covers at intersections for shade and rain protection for large numbers of people, where cyclists and pedestrians have to wait for traffic could assist (see the design used in Wellington, NZ) ▪ far better protection from heat, sun, wind and rain (and seating) at feeder bus stops for the rail, eg at the new Dickson Interchange, will be needed – many may have to wait there for some time, given bus timetabling for return journeys from the interchange, especially at night and on weekends ▪ a strong ACT Government commitment should be made at the start of the light rail to upgrade the rail stop structures if they prove to be too small, or provide inadequate protection from the harsh elements, or provide inadequate seating for the range of waiting rail users ▪ bringing people into the corridor, particularly during the day, needs to be supported in very concrete ways (also see Section 7.5: Community facilities, employment hubs and the mature aged – major roles. • To help raise the standards and amenity (comfort and cost) for future residents along and near the corridor, all future redevelopments should have EER 8 ratings

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	- p. 27 of the Framework urges passive heating and cooling for buildings and passive solar design is referred to on p. 30 - entries to recent ACT architecture awards (Canberra Times 30/4/18) provided evidence in Aranda of how EER6 can be improved on, to ensure residents use far less energy for heating and cooling, and so reduce energy bills - considerable improvement is needed in the siting of the majority of low or high rise residential and office development along the boulevard and nearby if the area is to strive for any sort of excellence, BUT ▪ recent revelations about a developer on Northbourne Avenue wanting to erect 490 or so units, most of which would not meet minimum solar access standards, suggest that the ACT Government cannot ensure delivery of even minimum existing climate standards for users, let alone sensible improvements. • In addition, standards for external shading/shades/overhangs should be introduced to assist those units with aspects which may receive too much sun and heat. • Other up-to-date standards and approaches should also be reviewed and adopted if possible to make the whole corridor a more significant response to climate impacts. 'Significance' is not only measureable in visual terms. Q25: How will the ACT Government ensure compliance with the climate-related standards, principles and criteria that are mentioned in the Framework to benefit users? • The above points also support why I offer a more climate-change action oriented, aesthetically pleasing, harmonious and quicker-to-develop and coordinate solution to the boulevard's appearance and environment north of Antill Street, Dickson and which meets the criteria outlined in the Framework – see above, Section 2: A different approach and reasons for this. 7.2 Linkages in and across Dickson and Downer for pedestrians and cyclists • It is difficult to envisage from the draft Framework how it will make 'a strong emphasis on the pedestrian experience' (see Chief Planner, Canberra Times 3/3/18) and deliver smooth, free-flowing 'links to public transport and high quality public spaces in this urban area' (ACT Government note to some Downer residents, March 2018) - particularly in and across the Dickson Central precinct, Dickson Section 72 and in Downer. • All links must be safe, appealing, and provide quick and easy access to destinations with few, if any, delays for pedestrians, and cyclists, including e-cyclists - only then will 'active travel' be adopted by more in this urban area - the current mish-mash of streets, lights and crossings requires review, in particular in and across the currently congested larger Dickson precinct - pleasant underground linkages would encourage connectedness to many parts of the whole urban area – reasons for such pathways are at Section 7.4: Poor east-west boulevard linkages; underground access and flow required

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	- improved public seating, toilet and water provision (see Section 7.1: Integration of other key ACT Government policies…, under 'Toilets, seating and water') must support these routes and linkages. 7.3 High quality public spaces for Dickson and Downer 4. It is not clear which parts of Downer and Dickson will receive 'high quality [public] spaces'. - these should be identified, with timeframes for provision - so far both suburbs languish as a result of delays incurred by inadequate or poor attempts at planning and presumably revitalisation - the Downer Central area (the former school site) is now a wasteland after years of community input to resolve issues and to try to ensure quality sustainable development of that site (Section 4: Downer focus unjust and unsupported – questions and need for integrated plans, refers) - Dickson Central, likewise has required a long period of community effort to illustrate the deficiencies of trying to cram two extra supermarkets onto a small central footprint ▪ many problems need to be avoided; perhaps one could be built to the east of Section 72 to help ensure the quality and amenity of the space that is Dickson Central (Section 5: Insufficient focus on workability and quality of the wider Dickson precinct also refers) - Dickson Central has the scope and potential to be a high quality space for commercial and public uses, and deserves to be so, given what is planned to be delivered as new 'urban hubs' at various points along the corridor, including just south of Antill Street on Northbourne Avenue, near the Dickson Interchange - more adjacent employment hubs in the Dickson precinct should be developed, given the rail stop there (Section 7.5: Community facilities, employment hubs and the mature aged – major roles, refers) - high-quality revitalisation the whole Downer-Dickson area is well overdue: a greater variety of quality outlets (not pop-ups) should be encouraged to Dickson, given what has been lost over many years, such as a men's' hairdresser, shoe shop, dry cleaner, sporting goods shop, delicatessen, greengrocer, two independent dress shops, and a jeweller. Suburban service centres in other cities are far more attractive visually and appealing to visit because of good quality and interesting outlets, especially for variety and quality of merchandise and foodstuffs which supermarkets don't and won't provide - more community facilities are also needed in this area and non-locals would also be encouraged to use these, given that there is a rail stop (Section 7.5: Community facilities, employment hubs and the mature aged – major roles, refers) ▪ the Dickson precinct, including Dickson Central, should be deliberately designed to become a drawcard for many uses other than supermarket outlets. 7.4 Poor east-west boulevard linkages; underground access and flow required 5. Options for linkages across Northbourne Avenue in both directions are not sufficiently considered in the Framework and are needed in order to break down the growing barrier created by the rail route, the problems and delays currently experienced particularly at the Antill

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	Street/Northbourne Avenue intersection and lack of future free-flowing routes for foot traffic and cyclists from one side to another. Highly practical solutions are needed - for all major intersections - at all other rail stops along the Framework corridors, particularly those that service interchanges (Civic, Dickson), and to assist people get efficiently to work, school, recreational and sporting facilities, new 'hubs' etc - cyclists and walkers and traffic on Northbourne could benefit greatly from the provision of underground walkways east-west at all rail stops at least, including the Swinden Street stop. These would save people precious time, reduce exposure to the elements and queue delays to those on the median strip, discourage unsafe crossing behaviour (such as at Civic and the current Northbourne Avenue/Antill Street pedestrian crossings at any time of any day), and keep vehicular traffic flowing better along the boulevard - not providing improved movement in these high-use both direction pedestrian areas is a long term false economy, and looks like poor treatment of people (ie not 'putting people first') ie residents, users of the rail route and those who want a greater and easier access to the east and west of the boulevard, eg to move west to Dickson Central. • Suggestions put to ACT Transport in the past for passageways (with lifts or other means of access particularly in Civic and at the Dickson Interchange) were dismissed as being too expensive - this 'false economy' in both the short and long terms simply passes all the ongoing costs to users ▪ in view of the cost of rail and all the other developments planned (and the income from these), the poor connections suggest pedestrians and cyclists will not be getting a good deal, nor will the vehicular traffic using the corridor ▪ yet the ACT Government wants more participation in 'active travel'. However, participation needs better support and encouragement, not busy road crossings and delays which impede free flowing, quicker movement of people to destinations. • Any more crossings, traffic lights and associated delays for all users of the Northbourne boulevard and within and around and adjacent 'hubs' and the Dickson Central area will cause more frustration, unsafe behaviours and long-term negative attitudes to the creation of the boulevard and access to the rail - ideally some streets within the Dickson precinct should be closed to car traffic, enabling fewer lights and delays along Antill Street (in the 600m east of Northbourne there are currently too many intersections and sets of traffic lights). 7.5 Community facilities, employment hubs and the mature aged – major roles • Community facilities along or near to the corridor receive very brief mentions (pp 60 and 64) yet could play a major role in attracting people to the area during the day (more cafes and 'pop-ups' are mentioned but are not the answer) - to ensure daytime use of the corridor via 'ground level activation' (pp 26 and 38) many mature age people will need to live along the corridor or visit there ie via rail - low cost, interesting and relevant activities and affordable meeting rooms/facilities need to be offered to attract and keep people in the corridor during the business week. These facilities or a community hub or two would ensure regular visits and utilisation, opportunities to meet people and create a range of communities along the corridor. They could also offer display/exhibition space

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	- the community hubs in Chifley and Cook are examples of such drawcards for activities and community groups, and help to support nearby businesses and cafes - a community hub near the rail stop at Dickson would bring more people to the area and increase rail use during the day - 'urban hubs' at intersections, as proposed in the Framework, will not meet the broader community objectives mentioned above. • Attracting mature-age residents on a more permanent basis must be addressed - the need for a good population mix in the corridor and the need to attract the mature-aged who will have better financial backing to buy into the corridor and live there is desirable but may present some difficulties, eg quality concerns (Section 1 II, point 4 refers) and changing attitudes to high rise eg 'Investments in new inner-city high rise apartments are only for the brave', according to the director of a major buyers' agency this week (Australian Financial Review 4 May, p. 4, 'House prices belted as banks hit skids'). • In addition, units left unsold or vacant by owners living outside the ACT will not attract the mature 'downsizer' population who currently live in urban communities and want to be part of new and interesting communities, not inserted into a corridor of more transient residents, Airbnbs etc. Q26: How long will it take to build and sell hundreds more residential units on the corridor? Q27: Will an overall timeframe plan for the corridor plan for all the many components be included in the final Framework? Q28. If an overall timeframe plan for the corridor plan is not in the final Framework, when will it be available? Q29: Can the overall timeframe plan for the corridor plan be made publicly available and regularly updated to show developments and progress? Q30: How will mixed middle-aged groups, particularly mature aged be attracted to high-rise living along the corridor and so ensure good levels of 'activation' during the business week? Q31: How will mature age potential corridor residents be assured of quality and thus avoid high stress costs for building remediation in the short, medium, and long term. Q32: What low-cost community facilities will be easily accessible on or near the corridor especially from Haig Park northwards and in the Dickson precinct? Q33: Will a community hub be established in the Dickson precinct? • Filling in the corridor: employment hubs? - the Framework's focus is on mass residential infill, no mention is made of major employment hubs/areas that would bring life and a mix of people into the corridor during the day. Q34: What plans exist to bring more employers and more workers into the corridor (ie in addition to those relating to small businesses like cafes and other small outlets)? 7.6 Inadequate basic consultation processes and information, more consultation

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	required. • The ACT Government and the planners and consultants employed to sift through submissions and draw conclusions from them should acknowledge and respond actively to the fact that insufficient information or communication about the Framework was given to the public, particularly in Downer; for example: - copies of the two major Framework documents listed on the website were not accessible in hard copy at public libraries for the duration of the consultation period, even though the public meeting on 9 April at Downer was assured that they were. Following a public request, one copy was made available in the Dickson library three days before the original submission deadline of 27 April ▪ the new deadline of 6 May 2018 then appeared on the website on 25 April, and was not made known to the broad public in any other way. Merely changing the date on the website would only have been of use to new inquirers, not those already striving to meet the original deadline, or who had given up any hope of meeting that deadline ▪ all documentation relating to 'YourSay' proposals should be available and prominently displayed in all ACT libraries and that availability advertised on 'YourSay' websites as well. • The stated aim in an ACT Government note sent via the Downer Community Association to some residents prior to the 9 April meeting was that that meeting would enable residents 'to provide input to more detailed planning provisions and engage with NCA and ACT Government planners' - few details were provided before, during, and after the meeting, nor was the rationale: the focus was on block densification and heights. Few questions on other impacts could be answered by the planning 'facilitators' at the tables ▪ the key block/height information supplied at the 9 April meeting (1 copy per table of 10 people) was not put up on the website as a key reference document nor was it made widely available before the deadline with clear explanations, as was requested at the meeting ▪ the 9 April Downer meeting spent little time on the broad Gateway vision, and no time on why Downer had to be impacted with six and four storey buildings, nor how the interface would work in practice – for example siting. ▪ views were sought 'on the hop', mainly about heights of apartments that those present might tolerate on and behind the affected streets in Downer ▪ many in Downer still have no idea about these details or have had an opportunity to consider their impacts on where they live over the coming years. • Far more needs to be done to improve the information provided to, and the understanding of, Downer residents and other interested citizens of what is planned, especially for a long-established suburb like Downer, and how concerns will be addressed - more day, night-time and weekend information and feedback sessions that are widely advertised would assist, with far more pictorial information and explanations included

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	- material and information about sessions also needs to be promoted and disseminated widely before meetings and throughout the public comment periods, including through libraries. This should be adopted as a normal 'good practice' to assist community engagement processes.
130	**Executive Summary** Cities are the social and economic engines of our time, and they are growing. Cities spawn new ideas and new businesses. They drive culture, education, research, and art. Managing urban development in the face of continued growth, globalization, climate change, and technological disruption has become one of the most important opportunities of our generation. For nearly a century, GHD has worked with both public and private clients to create the great urban centres we know today. In that time, we have grown from a small civil engineering firm a global, full-service A+D professional services firm, integrating a wide array of disciplines practiced by thousands of dedicated professionals. Significantly, as an employee-owned company, our commitment is to bring lasting value to our communities and to build for the future, particularly in the areas of planning and urban design. As part of the Canberra community we offer our comments to the National Capital Authority and the ACT Government respecting the proposed draft City Gateway and Urban Design Framework. Canberra, the national capital, also aspires to build for the future. The City seeks to build a more sustainable, successful, and equitable future for its citizens, businesses and visitors. The City Gateway Urban Design Framework is an important part of that goal. We know that the sense of arrival and procession along Northbourne, especially traveling south, is a defining experience of the City. We share the Framework's goals in creating a better future for Canberra. To that end, and as part of the Canberra community, we respectfully offer the following recommendation: **We recommend higher height limit at the corners of Northbourne and Antill, allowing a height limit, RL617, similar to that proposed at Northbourne and Wakefield.** We understand that the proposed height limit of 32 metres is based on what currently exists at this intersection. However, higher utilization at this site better supports Canberra's sustainability strategies, transit initiatives, history, heritage, and the stated goals of the Gateway Design Framework. Amending this proposed planning framework will help underscore the values of our City's urban future and meet the aspirations of Canberra's most valued planning traditions. Without causing major infrastructural, visual, or development-related disruption, the additional height allowance will help the City create a better front door, a more significant gateway, and a better-integrated future for Dickson and for Canberra. **1. Introduction** **1.1 Purpose of this report** In conjunction with the National Capital Authority, the ACT Government has published its "City and Gateway Draft Urban Design Framework" (March 2018) and has invited public comment. The potential value of the Northbourne Property has not been fully addressed in the proposed framework. As part of the public commentary, our goal is to create a vision of what more appropriate development on the site might look like and how it might better serve the objectives of the Urban Design Framework.

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	The purpose of this report is to demonstrate a rationale for the development of a 44m AFL (617m AHD corresponding to Canberra's RL617 height limit) high multi-use building on Block 15 Section 33 in Dickson, along Canberra's gateway corridor of Northbourne Avenue. These comments and recommendations include the conceptual proposal of a potential building that could mark the entrance to this significant urban quarter of the city – a structure which aligns with current and proposed planning controls and makes the case for the appropriateness of additional density at the significant corner of Northbourne and Antill. Dickson centre, 1968 Aerial photo from 1968 showing the Dickson centre

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	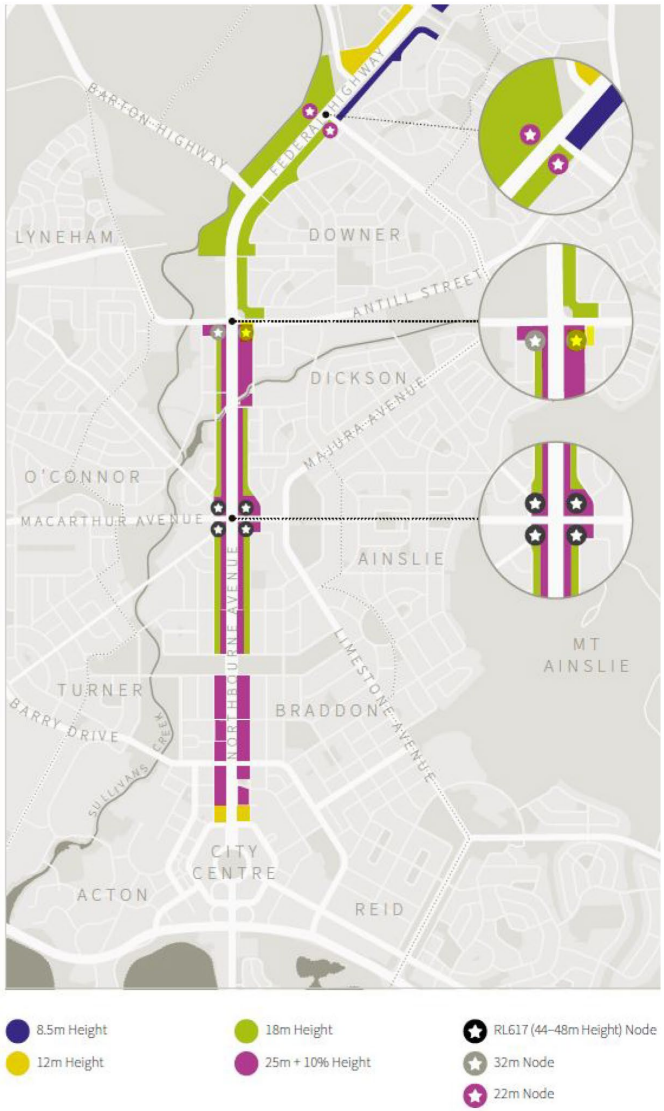 Proposed Planning/Height Limits (Map 6 of Draft Framework illustrating proposed building heights and nodes in City and gateway corrdior)

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	1.2 Current Site Condition and Planning Controls The site is situated in Dickson on Block 15, Section 33 in a CZ5 Mixed Use Zone. CZ5 zoning allows multiple uses such as commercial, residential and retail within a single building. Permittable and prohibited uses and development in this zone are listed in the CZ5-Mixed Use Objectives, 8 December 2017. The gateway corridor of Northbourne Avenue is governed by ACT Planning's Northbourne Precinct Code. Some of the critical planning controls in the precinct code are as follows; • 32m maximum building height to the top of the parapet - R11 • 25 m building line setback along Northbourne Avenue – Clause R13 • 10 m minimum building line set back along Antill Street –Clause R24 • 9m second storey and 12m third storey setbacks to southern boundary line (Block 16) if window sill levels are less than 1.7m – Clause R15 • 5m minimum southern building line setback (Block 15) – Clause R26 • 10m minimum eastern building line setback (Challis Street) - Clause R26 • Balconies and awnings can encroach up to 1.5m within minimum setbacks – Clause C30 • Extensive areas of continuous glass along Northbourne Avenue are not permitted – Clause C31 • Off-white to light buff/grey major building finishes with alternative colours including earth toned for minor building elements are only permitted along Northbourne Avenue – R33 & C33 • Setbacks along Northbourne Avenue are to be landscaped in accordance with the precinct code– C49 • Loading docks and vehicular entries to buildings are not to be located on frontages to Northbourne – R42 **2. Opportunities** **2.1 Urban Framework** **2.1.1 Introduction** Urban renewal programs and growth along Northbourne Avenue provide an opportunity to revitalise the gateway corridor into Canberra's urban district and CBD. An opportunity to deliver world-class architecture to strengthen Canberra's unique urban and rural landscape setting also provides exciting opportunities while addressing population demands along this major transportation route. Supporting a large population at key locations along Northbourne will enable more people to live and work close to sustainable transport options, services and infrastructure deceasing the demand on land elsewhere. The importance of the junction of Northbourne and Antill Street in Dickson is such that it is justified to support a height limit increase from 32m to RL617, (approximately 42m - 44m) to support these new opportunities and needs. **2.1.2 Design Principles** • **Development to Support & Drive Economic Growth** It is anticipated that the population along Braddon, Turner, O'Connor, Lyneham and Dickson to reach 11,600 by 2030. Between 2016 and 2031 there will be a need to house 4,100 additional people. This increase in population and associated demand for services will require a significant increase in

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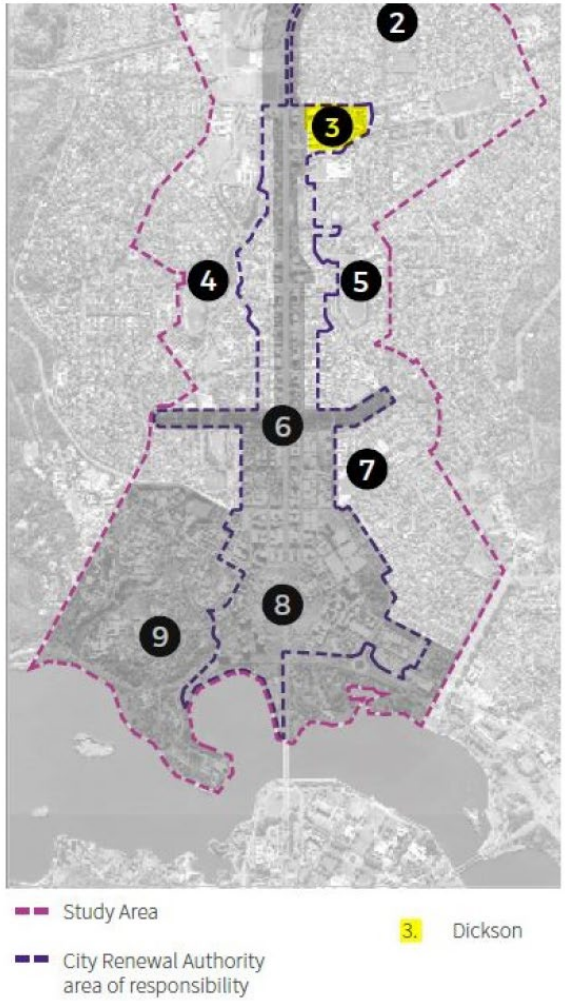
	availability of residential properties, retail, tourism, and community services. Also, to drive this an economic growth to the area of Dickson, the proposed multi-use development will serve to support the residential, retail and tourism demands.

	ESTIMATED POPULATION		
STUDY AREA	2016	2031	CHANGE BETWEEN 2016 AND 2030
City, Acton, Reid and southern Braddon	9,050	15,200	6,150
Corridor along Braddon, Turner, O'Connor, Lyneham, Dickson	13,100	16,500	3,400
Corridor along Downer, Watson, Lyneham and Mitchell	7,500	11,600	4,100
Surrounding areas of Inner North adjacent to study area boundary	24,500	28,000	3,500
Total study area and surrounding areas	**54,150**	**71,300**	**17,150**

Source: ABS and EPSDD 2016

Table from page 8 of the City and Gateway Draft urban Design Framework showing the estimated population figures for the study area for 2016, 2031 and the change between those years



City Data illustrating population growth and the subject area.
Map 1 from the Draft Framework showing the city and gateway study area from Downer to City with Dickson highlighted

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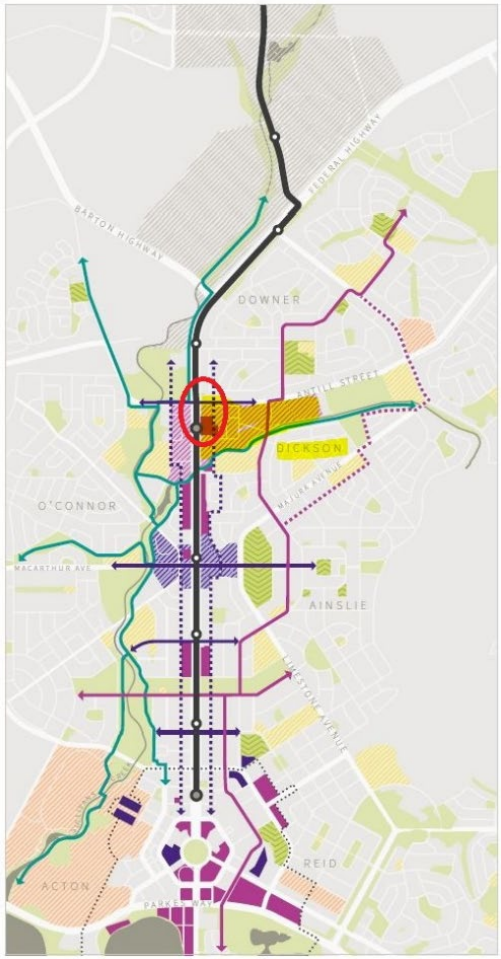
	• **Development to Increase Connections to Public Transportation** The site for the proposed development area is predicted for high population growth due to its convenient location to the transport corridors of Northbourne Avenue and east-west active travel connections, bus stops, light rail station and proximity to the Dickson Group Centre. Nodes of increased residential density are required to support population growth which will in turn decrease demands on private transportation with the support of public transit. Map 2 – spatial framework of the Draft Framework showing the proposed long term structure of the corridor  MAP 11 DICKSON URBAN VILLAGE FRAMEWORK PLAN Map 11 of the Draft Framework shows the Dickson urban village framework plan

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	• **Dickson Group Centre to support population – Development to Support New Businesses and Urban Village** The proposed development is conveniently located adjacent to the Dickson Group Centre and future Dickson Urban Village. To decease the demands on transportation and increased carbon footprint, a large population requires convenient access to local services. A large and stable population also drives opportunities for tourism, businesses and commercial developments for economic growth. • **Development to support Government Office Building** Under the 2011 Dickson Centre Master Plan there is a proposed Government office Building to be built in Dickson. To support public servants and an increased working population in Dickson there will be a requirement for residential density in this area. • **Development to enhance recreational Opportunities to support an active lifestyle** Southwell Park, Hockey ACT, Netball ACT and Yowani Country Golf Club can all be conveniently accessed across the road by foot. Cycle and pedestrian paths to Canberra's extensive network are conveniently located on the site. Having a large population in close vicinity to sporting facilities, retail outlets and public cycle and pedestrian paths will promote active travel and active living. A healthier community will decrease demands on our health system. • **Development to increase Public Security** Increased population enjoying an active public realm provides increased public/passive surveillance and public security. • **Marking a Group Centre** As mentioned earlier, Dickson is a Group Centre. The other three corners of Northbourne/Antill/Mouat intersection do not have Group centres so a significant landmark at the southeast corner with a higher building height allowance is best able to reflect the status of this Centre. In time, this will take on additional significance as the Dickson commercial centre densifies, and other concurrent master planning efforts come on line. • **Place making, Public Realm and Social Perception** By activating its building edges with multi-use functions and an open plaza area, the proposed development aims to encourage and promote a high quality public realm supported by its proximity to public transit and the Dickson Urban Village. A place for the community and visitors to gather for social events and to meet. Spaces for play, events, social gatherings and waiting for bus or train. As the northernmost urban hub along Northbourne, this development will provide the first impression of Canberra along the gateway corridor. A highly active public realm at this hub, linking the light rail to mixed-use centre, will validate Canberra as a liveable, resilient, and vibrant city. • **Establishing a Landmark** The gateway corridor into Canberra is articulated through areas of distinct character that signal the approach into the City Centre and to Parliament House. The arrival into the City Centre proceeds from bushland to informal urban area to more formal building forms. The first urban node into Canberra begins at Block 15. This first point of the urban layer of Canberra provides the opportunity for a landmark building of significance. Significance in regards to both height and form – a building at provides the first impression of Canberra and sense of arrival to both locals and visitors. **2.2 Formal Activation** The Draft Urban Design Framework seeks to maintain and enhance environmental amenity and undertake development using best practice environmentally sustainable development principles. This will be done by: – Designing buildings that promote a human scale at the ground level, such as building awnings and colonnades.

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	– Using buildings to enhance the character of the local place. • **A Landmark Building at the corner will reinforce and celebrate the 'Bush Capital' character of Canberra** The experience through the gateway corridor transitions from a 'Bush Capital' – informal bush and grassland - character to more formal boulevard towards the city and terminating at City Hill. The proposed development aims to continue the Informal Park Boulevard objectives within the *City and Gateway Urban Renewal Strategy*, including the landscape through the use of gardens on the podium and roof levels. The layered gardens will soften the massing of the building, provide private recreation space for building users, and promote and complement the city's distinctive green spaces and generous, tree lined streets. *Planted Roofs provide passive recreation space and other health benefits* (Picture showing a rooftop garden) • **A Major Building at the corner will reinforce and celebrate Canberra's Significant Buildings** Late twentieth century styled architecture based on new technologies of construction with the use of glass, steel and reinforced concrete defines the most significant and enduring buildings in Canberra such as Parliament House, High Court of Australia and Australian Natural Gallery (ANG). The High Court of Australia and ANG reflect a late-Modern style of architecture called Brutalism. Brutalism is characterised by top heavy massing of concrete, strong bold shapes, expressed concrete, repetitive angular geometries and punched glazed openings and communicates strength function, honesty and power. The proposed development controls refer to this architectural tradition. Any proposed building on this site should acknowledge Canberra's historic architectural style while at the same time maintaining the more informal Park Boulevard character of the Northbourne gateway.

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	 Examples of the Late-Modern Brutalist architectural style **2.3 Environment** • **Gardens to provide heat sinks and improve air quality** **T**he development intends to provide significant vegetation to this area to enhance and soften character of the building and promote the "Bush Capital" notion of Canberra. The increased vegetation will also improve the air quality to a high traffic area of Canberra. In addition, vegetation reduce the heat island effect caused by the absorption of heat by hard surfaces. Reducing the heat that surrounds the building will also reduce the energy demands on the building. *Greening the Public Realm*

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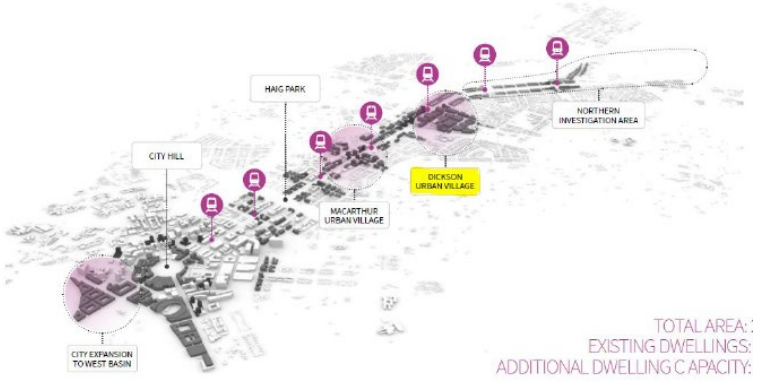
	• **Sustainable Principles** The development will support sustainable building performance and low carbon living by: • Responding to Canberra's warm dry summers and cool winters by the use of sustainable building principles such as passive heating and cooling; • Minimise energy use by using sustainable materials; • Minimise water use by stormwater capture and re-use; • Provide bike storage to encourage the use of non- polluting form of transport; • Reduce the number of private vehicle parking spaces; • Encourage the use of adjacent light rail and buses. • **Decreasing Carbon Emissions** A typical car emits 4.6 metric tons of carbon dioxide per year. Increasing the population at a location with convenient access to public transport will take more cars off the road. Taking more cars off the road will reduce carbon emissions and the carbon footprint of the City. The proposed Dickson Urban Village and development at Block 15 will provide a mixture of land uses, businesses, offices, retail, hotels and other developments in accessible location. This will encourage the use of walking and cycling, pollution-free forms of transport. The use of local materials will also decrease the carbon footprint of the proposed development. These strategies conform to the ACT's Climate Change Policy. **2.4 Infrastructure** • **Maximising benefits of Light Rail and buses** For the light rail to become viable there needs to be a significant population to support it. Therefore, there is a need for residential densification around the main light rail stations. Block 15 is immediately adjacent to a transport interchange and thus has the opportunity, if not the obligation as part of a world-class urban design, for significant residential densification. This development potential also conforms to the ACT's Climate Change Policy.  *City Diagram illustrating targets for additional residential density served by light rail*

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	3. Concept and Recommendation *Concept – View to the south along Northbourne* Based on our analysis, this concept represents only one of many possible responses to the great opportunities presented by the confluence of these urban opportunities. As an investigation of these opportunities, our conceptual proposal demonstrates that a landmark building (of any design) can be successfully integrated at the intersection of Northbourne and Antill. A successfully planned and designed building can be implemented that works with the existing urban context and development controls while at the same time building a meaningful sense of arrival by marking the northernmost urban node of the central city. *Concept - View looking west along Antill*

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	This particular mixed-use proposal accommodates ground floor retail, a transit plaza, a boutique hotel with rooftop garden and pools, and a residential tower (also with rooftop open space and recreation facilities) whose geometry is dramatically "cut" to allow greater light penetration, past the program blocks, for guests, transit patrons, and urban neighbours. *Concept - Aerial view looking at the intersection of Northbourne and Antill/Mouat Streets* *Concept - Aerial view looking south along the curve of Northbourne* The building does not dominate the landscape, but respectfully marks its space and the logical gateway boundary of the City. With a highly activated public realm, the development at this corner will help Dickson take greater advantage of the light rail line and establish a place that will benefit the community for years to come. The building helps link the Dickson Group Centre to the City's light rail system, creating a seamless urban landscape that creates place locally while helping to build a more connected City. We have reviewed the proposed framework draft carefully and find no overwhelming reason to limit development at the Northbourne/Antill intersection. Rather, the goals of the "City and Gateway Draft Urban Design Framework" (March 2018) proposed by the ACT Government and the National Capital Authority are better served by allowing higher density at this urban node. This increased density additionally supports other policies and directives by both the ACT and the NCA. An increased height limit at the southeast corner of the intersection supports City-wide goals for public transit-supportive, sustainable design, urban activation, and compatibility with Canberra's unique architectural heritage and distinctive planning traditions. As our concept proposal suggests, the proposal to include an RL617 height limit at this gateway site is entirely compatible with existing and proposed urban design guidelines while providing additional benefits to the City in terms of liveability, economic activity, placemaking, and helping to extend Canberra's urban brand to its northern gateway. **Our recommendation is to allow an RL617 height limit to the development controls at this site.**

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131	**COMMENTS ON CITY & GATEWAY URBAN DESIGN FRAMEWORK** **Buildings heights, Downer and Watson** Page 28 of the Framework shows that the proposed building heights in Downer along Northbourne Avenue and Federal Highway, and the west sides of Blacket, Atherton and Banfield Streets, be increased to 18 metres (5-6 storeys) from the present 8.5 m (2 storeys), while along the Federal Hwy, Watson, it is to be 12 m (3-4 storeys). Furthermore on page 29 it says that "the minimum heights shall be no less than 80% of the maximum height", i.e. as high as 14.4 m in Downer. None of the present residences comply with these requirements, so that all of these would eventually be demolished. The residents would come under pressure from developers to sell, and those who resist will either find themselves hemmed in by high rise neighbours on either side, or be forcibly removed as happened in Braddon some time ago. Those living on the other sides of the affected streets would find themselves facing walls of high rise, and having to live with greatly increased traffic on their narrow streets that were not designed for such buildings. The building scale is all wrong for the current residential areas. The present residents bought their properties where they are because they sought out an environment, amenity and life style that they wanted, without any inkling that government agencies would want to make such radical changes. In fact, before I bought my property I made specific enquires of the government as to what developments were going to occur in my area, and I was told that none were planned. We who bought our homes in these areas in good faith feel angry and betrayed at this uncalled for intrusion on our way of life. And it's all so unnecessary. Page 29 of the Framework says that "Development will generally present a symmetrical built edge to both sides of the corridor". Yet this will not happen in the Downer-Watson area, because the map on page 28 shows no development north of the Federal Hwy east of Flemington Rd, and the Lyneham sports fields along Northbourne Ave will not be built on. Apparently this has more to do with the ideological target of "30% active travel", to be disproportionately imposed on the people of Downer and Watson, by turning some parts of the city (and eventually the whole city?), into an ant heap like Sydney. **Lighting** Page 21 of the Framework, under the heading of *Lighting,* contains the statement "Light spillage is to be minimised to prevent unnecessary night sky illumination". This is commendable, but I suggest adding the words "by not allowing direct light above the horizontal and conforming to the appropriate Australian standard for street lighting". On the other hand, it is puzzling that on the very same page, under the heading of *Border Identification*, it says "If practical, <u>uplighting of the border marker</u> and adjacent tree canopy should be used". This is at odds with the above-cited policy. If the border marker needs to be lit at all, it should be by downward-pointing lights.
132	We strongly object to the proposal to make Banfield Street Downer part of the "Informal Park Boulevard" in the draft plan. Banfield Street is a narrow, quiet suburban street. It does not tend to be used as a transit route to other parts of the suburb. It is for these characteristics that most home owners and renters moved here. The proposal to allow building heights of 12 metres on the north western side of the street will destroy both the appearance and the amenity of the street. Allowing buildings of this height will not even achieve the profile illustrated in the plan for the Informal Park Boulevard, as there is no

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	secondary road. All that would be achieved by the increased heights in Banfield Street would be higher population density in an ugly street. This has already happened to the southern side of Blackett Street. It would be a crying shame to allow this to happen to Banfield Street.
133	It was recently bought to my attention that there are proposed changes to increase height restrictions on properties which we understand would allow for up to 5 storey buildings on Northbourne Avenue and Swinden Street, and 3 storey buildings on streets including Atherton, Blackett and Banfield. We are deeply concern by this. We have been residents of Downer for over 35 years. We live on [….] Street, in an area which would be affected by the height restriction. Lack of privacy, over-shadowing by tall buildings and the blocking of the sun to our back yard would greatly affect us. I am concerned that the residents of Downer have not been sufficiently consulted and are unaware of the proposed changes. We look forward to hearing that the ACT Government will consult fully with the residents of Downer, particularly with those who are affected.
134	**City and Gateway Draft Urban Design Framework – NCCC [North Canberra Community Council] Submission** We would like to commend the National Capital Authority and the Environment, Planning and Sustainable Development Directorate for working together on this project and creating one combined consultation process rather than two separate processes. We hope that there are many more similar combined processes. The framework is an excellent piece of work that puts forward a vision for the next 25 years and probably well beyond which makes it a mammoth task to take it all in and then form excellent views of the future that the work in some ways calls for. What is being considered is the form that one gateway to the National Capital should take and how it reflects the aspirations of a nation while reflecting Canberra's status as the bush capital and its garden city reputation, which needs a special skill to combine. The proposal to implement a design review panel appears to be an excellent idea however the devil could be in the detail of how this panel would be set up. The intention of getting renowned and respected experts from all corners of the globe to review may prove to be too expensive and complicated to organise. This should not stop us from trying but we need some excellent hands putting this together who can do it with minimal added costs to the development processes. It appears that one of the key things the design review panel would assess is the mooted height uplift for buildings of excellent architectural significance which appears not to be fully defined. We contend the 'excellence' should include consideration of how the building kisses the ground and how well it connects to the street and other parts of the public realm. Design excellence needs to include many parameters, not the least the distance between buildings and the permeability with areas behind the building. Extra height could be awarded to some of those buildings which have a smaller footprint. The articulation of three distinct zones along the approach route has merit, however rather than what appears to be two very distinct changeover points between the zones, it is suggested that there should be some form of rolling changeover between the zones. As an example, the Informal Park Boulevard area on the eastern side of the Federal Highway from Antill St could include 4 to 6 six storey buildings set well back and use landscaping that complements the landscaping in the Approach Route. The light rail is introduced to the Park Boulevard at Flemington Rd and gives a wonderful opportunity to begin introducing the building types and topographies of the more formal Avenue precinct. Buildings in the area south of Flemington Rd on the western side of the approach could have taller

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	buildings of say ten to twelve stories with smaller on ground footprints well set back and with wider spacings between buildings. The buildings could 'creep' closer to the carriageway as they approach Mouatt St. The area of Downer from the southern end of Antill St, north to Swinden St and possibly beyond as far as Watson, needs special consideration. The potential to change the building heights must be treated carefully with 12 metres on Northbourne Ave possibly ok but having 12 metres on the local streets behind potentially being overkill. This will require considerable and very skilful consultation with the local and wider communities. The Macarthur Urban Village is of concern in a variety of ways. Basing a village on the corners of what is a very busy intersection (that may well be in the top five of busy intersections in the ACT) seems odd considering the current configuration and the potentiality of it becoming busier as traffic is diverted from Northbourne Ave. The village concept doesn't appear to work. This proposed village may not end up being a cohesive whole but four fragments that don't come together as a 'real village'. Connecting the four parts will require some fine minds working in very creative ways to break down the barrier to easy transversal in the east-west direction when considering crossing three lanes of traffic then the median containing a relatively busy light rail and then another three lanes of traffic. While the north-south transversal may be a little easier it will still require a reasonable amount of traffic dodging. The framework is at one level a conceptual document, however with more details at some levels. The details on traffic are at best cursory and have already created angst within many sections of the community. Northbourne Ave and the Federal Hwy at the least through to just beyond Antill St (north) is shown as a Transit Road as have some other roads. We currently have no definition of what a transit corridor is or how it should work. If the staged narrowing of Northbourne Ave goes ahead and we get two lanes in each direction with a speed limit of say 30 kph that would mean we would need, at some point in the future, to do something similar on say, Barry Dr with another slight variation for Constitution Ave and yet another variation for the lake crossing at Commonwealth Ave. Some of the roads shown in Map 14 on page 49 are listed as Arterial Roads which will need some extensive upgrades and improvements. The Macarthur/Wakefield east-west corridor and Limestone Ave would need upgrading to three lanes in each direction and Fairbairn Ave should be upgraded to a minimum of two full lanes all the way through. Mouatt St would need upgrading to a minimum of two lanes in each direction with the potential for three lanes in each direction from Ginninderra Dr to Northbourne across into Antill St at least to Phillip Ave. There is quite a variation between roads shown on Map 14 as collector from the divided road of three lanes in each direction along Cooyong St to single lane in each direction on Cowper St and others. Some of these roads have no potential for widening without destroying the garden city character of the area. Even with the best will in the world getting traffic off Northbourne Avenue the traffic will not disappear and move to the (probably unimproved) Arterial and Distributor Roads creating even more rat running and consequent angst for residents. Map 13 on page 47 shows Key Cycle Network Routes and Active Travel Streets. Many of the Active Travel streets already are 'rat run' streets and with massive development already occurring along Northbourne even more traffic being poured onto these streets they will need a lot of extra treatment to turn them into safe active travel streets which would ideally include separated cycle paths. It must be noted that many multi-unit developments have had less than adequate on-site parking provision with consequent spillage onto adjoining streets. The continuing development of Northbourne Ave has the potential to create havoc with too many cars parking on streets such as Dooring St which will kill the possibility of safe Active Travel streets long before they get the chance to be implemented.

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	We have some attraction to an idea, that needs further investigation, of making Northbourne Ave two lanes in each direction on one side and turning the other side into a separated cycle arterial with tree planting and potentially pod kiosks on the 'old' roadway. While it would be an engineering challenge, it would not be beyond the wit of some clever people. Doing something similar would reduce the east-west pedestrian barrier that Northbourne Ave currently is. The Framework proposes significantly increased density along Northbourne Avenue and in other areas of North Canberra and, while the Framework makes numerous references to 'the bush capital', 'urban forests' and 'garden city', it proposes absolutely no increase in dedicated green space and urban amenity. This planning process is an opportunity to increase the greenery in the city centre and the corridor. The opportunity to improve the public realm is not something to be dismissed lightly and done well could turn the corridor into something remarkable. While the Framework contains many commendable ideas, it fails to adequately acknowledge the negative consequences flowing from the redevelopment of Northbourne Avenue, and how these negative consequences will be addressed. Without a proper understanding of the full impacts of the proposed redevelopment, the issues this Framework is attempting to address will simply be transferred to other transport corridors. In other words, it is likely the improvements to Northbourne Avenue will come at the expense of the liveability, amenity and safety of other areas of North Canberra.
135	I am writing to express my serious concern, and disappointment with some of the draft plans put forward for community engagement, in the current City and Gateway Draft Urban Design Framework (March 2018). And writing furthermore to request that major adjustments be made in a second draft version, and that this second draft version also be then shared with the community for engagement and comments, including additional planning discussions at the Downer Community centre in months ahead, to ensure that any changes are not 'rushed thru unfairly without listening to the residents of the communities targeted for these proposed changes. And to ensure any changes or adjustments do not 'unfairly and disproportionately' burden the residents, many long term for 30-50 years, in the peaceful suburb of Downer - especially those in the streets that have Northbourne Ave to their west - namely Blacket, Atherton, and my street – [……] st. To start I will talk to the community meeting that was held, which ACT government planners attended, on April 9th. The meeting was large, had many residents attending, hundreds, and from the summaries given following table/group discussions - it was unanimous that residents were against the proposed major changes to the quiet community of Downer especially proposed planning height changes to streets mentioned above. It was a deafening expression of concern over this proposed building height increase...and residents were in a majority uncomfortable with these changes, and commented strongly that anything more than 3 story buildings ever being allowed in this area, would not be appropriate. And that the preference at table I was at, and many others, was for any changes to allow 2 story buildings only with any block-joining, to allow any larger developments - noting in my view that this was more appropriate in the future, looking 20-30 years ahead, and not needed now based on canberran development in other areas, and population numbers. And there should not be a rush to make changes now, that may not be needed for 20-30 years. It can be reviewed again in 10 years instead. It would be a major change to allow blocks to 'join together' to allow development within any of these areas. A major change to density and traffic congestion, would be made through simply allowing blocks to join together, and build larger town house developments of units - and this even would be too much for the current amenities, lack of schools and facilities, and lack of sidewalks and basic infrastructure in Downer. The suburb is peaceful, relaxed, has residents long term, and many new young families rebuilding new houses in Banfield, Atherton and Blacket streets.. and who like me, moved here to be in a peacful suburb close to Dickson and the city, but far enough away from development to remain community.

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	Downer has a strong community feel, and we wish to keep it the relaxed peaceful way it is, for kids growing, young families, safety for older people in tjhe community, as well as to prevent traffic congestion and a loss of the peaceful way of life we curently enjoy. Additionally it is a very beautiful drive down past the playing fields, golf club, low level houses, to Antill St, before you realise you are entering Canberran area as you drive down Northborn to the city. Development of unit blocks should only be allowed in commercial areas such as Dickson, and along Northborn aves, and these should be the only areas under National Capital Authority planning decisions... north of Antil St is a removed community and suburb, and should be left as it is, to maintain the relaxed bush capital that Canberra is. Not to change into a concrete jungle, or to have higher denisty housing destroying the relaxed look and feel of this community and area. I wish the period of comments to be lengthened to include the 2nd draft which should also go for community consultation. i recommend no planning change to building heights in Banfield St, and the relaxed housing level behind the park area that the community plays, walks dogs and rides to work in, is part of teh relaxed feel of canberra, and should be left. Additionally banfield St residents, do not want 3 story unit blocks or town houses, disturbing privacy of their backyards for kids, or safety and security and congestion in the streets. This is a major concern for young families here, as I have talked ot t hem, and for older couples living here. Downer facilities are not able to support increased density, shops were removed, schools gone, sidewalks missing...this is not the community to make these changes to. CLoser to Dickson in a commercial area, sure, or on Northborn, not here. The suggested housing density increase from 17000 to add 37000 new poeple.. is unfair and disproportionate burden on the community and area. Likewise buiildings any higher than 3 stories should not be allowed on west side of northborn, ini bkambrook wines, as that would be privact issue for backyards in streets of banfield atherton and blacket. Traffic congestion issues and making northborn a psychological divide as well as physically more difficult to cross is also negative and unfair for community and residents. Reduction proposed of 20% of sun is not fair and not appropriate either, nor is the 6 metre setbacks. I dont want 3 story units looking into my bakyard with my kids playing there. I moved to this quiet are to raise my family, and ask that you respect that for all families here, and leave development at this time, in commercial and dickson areas. Any changes you consdier for banfield athertona nd blacket should ONLY be to allow maximum of 2 blocks to join together, and allow only 2 story townhouses - any more is too much density and congestion, and would place undue burden on residents, as wella s provide too much traffic congestiom and change the peaceful suburb of downer too miuch. There is adequate units in flemington road and to Gunghalin, and on Northborn after antill st, to use train, no need to affect community in Downer. review again in 10 yewars. Loss of sun, looking buildings, unnatural changes to peaceful suburb..and building heifghts, are all majoe concerns for residents here. I ask , we ask that you consider these wishes of residents, and make changes to these draft plans, putting out for another review. As planners said at the meeting on April 9 - 'we have some work to do'. Alot..I suggest best to develop areas all canberra will be ok with, old flats and northborn ave revitalilsed, and dickson area. Please leave North of Antil St alone and as is. It is a beautiful part of canberra, welcome your visitors with this beauty, don't change this unique area in Canberra. The gateway is on Antill St.. that is where development should start, not before that.
136	Thank you for the opportunity to provide feedback on the City and Gateway Draft Urban Design Framework. I generally support the aspirations and directions outlined, and encourage the ACT Government and National Capital Authority in some instances to be bolder – the redevelopment of Northbourne Avenue currently underway will only happen once. With the majority of blocks having single owners it is comparatively easy to redevelop now, whereas most new development will likely be unit titled residential making it substantially more difficult to redevelop again in the future.

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	I encourage the completion and implementation of the Framework and the subsequent work it implies as a priority – given much redevelopment has already occurred and is underway, and the ACT Government has already sold and is selling its land along Northbourne Avenue this Framework is urgent. I request that in the interim the ACT Government play a particularly proactive leadership role to require design excellence as set out in the strategic goals and principles (to achieve "a world class boulevard" and "world class architecture") for development that is happening now – eg special conditions should be applied to the sale of Macarthur House (so that the urban village is truly *urban*) and the redbrick Northbourne Housing precinct between Condamine/Ipima Streets and Haig Park (so that we get nothing less than the architectural quality intended in the John Wardle competition winning scheme for this site), and development control plans for the heritage Northbourne Housing precinct in Dickson and Lyneham should require a design led approach to development that is happening there now, including independent design review by a panel that includes nationally esteemed members. The Chief Minister has said that he wants to see award winning development along Northbourne Avenue. Most recent development on Northbourne Avenue and Flemington Road has been poor if judged by the number of architecture award winning projects. Government can initiate an improved design culture for example as has been successful elsewhere with design review (eg the CABE model from the UK) and design competitions (eg as the City of Sydney have required). A good case study locally is New Acton and the positive role that the National Capital Authority played. MacArthur Urban Village **1. The MacArthur Urban Village should be *urban* (ie mixed use) with a daytime population and employment not just a high density dormitory precinct.** Without a weekday population the term urban village would be a misnomer (but nice marketing). A weekday population increases the viability of businesses including cafes and services that can then trade at more times ie without it there will be less active uses at street level. Given the ACT Government is withdrawing all its public service workforce from this location – MacArthur House and presumably 220 Northbourne Avenue (the former NCDC offices) – and Northbourne House formerly a Defence Department Office has been converted to a hotel, and the *current* state of the market tends toward residential development and minimum floor heights to maximise yield then despite the zoning being mixed use it is likely that there will be minimal daytime population without other planning controls. The requirement for the core sites to have active building edges at ground floor is commendable but is insufficient in itself. There should be requirements to have additional minimum commercial/office space and further units that can be adapted as boutique offices. Where the marker node buildings with increased height are proposed these should be required to be as a minimum something like shown in Figure 8 furthest to the right with commercial levels above ground. This is not unreasonable to *require* given the proposed increased allowable height (and yield). **2. Opportunity for exemplar place making – the government should take the lead and collaborate with property owners / developers** I support the intention for "world class architecture" and "distinctive identity" in the Framework for MacArthur Urban Village. There are two special place making opportunities that the government (eg the City Renewal Authority) should take a lead in pursuing in collaboration with property owners. The first is for the redevelopment of the ABC studios site with the ABC staying as an anchor tenant like Martin Place (Chanel 7), Federation Square (SBS, ACMI etc) or the Rockefeller Center (including NBC) or even Times Square. The second is for Churchill House to be adaptively reused as the centre of a mixed use precinct providing a historical layer with rich texture and human scaled spaces that could be as successful as New Acton adaptively reusing the Acton Hotel instead of demolishing it.

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	So much recent development is bland and lacks any attention to place making – unique character (Churchill House) and unique activity (ABC studios) is a special opportunity for distinctive identity that may be lost if not articulated as part of coherent strategy for the development of MacArthur Urban Village led by the government. **3. More than a convenience store – there should be a small supermarket** There should be 1000-1500m2 supermarket (eg an IGA) at MacArthur Urban Village. MacArthur House would be an ideal site as it is adjacent to the light rail station and will be redeveloped sooner than the ABC Studios. The distance from MacArthur House to O'Connor Shops is 1.1km, to Lyneham Shops is 1.2km, to Ainslie Shops 1.3km and to the supermarket at Dickson 1.7km – ie not within easy walking distance and with a population increase in this area of multiple thousands ie the size of many Canberra suburbs, a supermarket can be supported without detrimentally impacting nearby local centres. Building edge types and ground level public realm interface **4. Further requirement for active and adaptable ground level interface** The explicit requirement for active building edges and adaptable building edges with guidelines clarifying floor height while giving opportunity for a mezzanine floor are both commendable improvements to the current practice of development in the CZ5 zone along Northbourne Avenue. There should also be requirement for a small provision of active building edges to the corners around the Condamine / Ipima Streets light rail station and for development near the provided for future Owen Flats / Visitor Centre light rail station. Otherwise development along the entire extent of Northbourne Avenue between MacArthur Urban Village and Dickson should be required to provide adaptable building edges, particularly for the Lyneham and Dickson Northbourne Housing Precincts. Further, within the residential building edge type there should be guidance to encourage adaptability such that there can be live/work opportunities (ie home businesses) such as music teacher, maths tutor, sole practitioner professional, masseuse etc or adaption to boutique offices or a yoga studio etc – particularly for edges on CZ5 zone blocks to secondary streets ie the active travel streets (Forbes Street etc) and the RZ3 and RZ4 blocks opposite, as well as other important streets such as along David and Wattle Street and MacArthur and Wakefield Avenues beyond the core sites of the MacArthur Urban Village. By this I don't mean that higher ground floors perhaps with a mezzanine should be required as for the adaptable building edge type (although this would be nice to suggest as an option) but that simply and particularly direct access to units eg through courtyards or a terrace typology should be required (rather than access only being provided through a secure foyer). The idea for a park or green edge type is commendable too.

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	 Northbourne Avenue transit boulevard **5. Northbourne Avenue should be reduced to two lanes in each direction with the third lane converted to a cycling lane as proposed. This could (should) be achieved in the short term.** I strongly support this proposal both for the 'urban' and 'formal landscape' avenue sections as shown in Figure 12 and thank the ACT Government and National Capital Authority for putting it on the table as an aspiration. I say don't be timid. It should be in the Framework as a priority even in the short to medium term. Now is the ideal time to reduce Northbourne Avenue to two lanes with implementation of light rail (perhaps in conjunction with stage two) and following the recent completion of the peripheral north south parkways, Gungahlin Drive and Majura Parkway. If not now, then when would we ever? The third lane is not needed outside of peak, and during peak it is unusable due to buses stopping. If congestion is reduced with the removal of buses then perversely the implementation of light rail would act as an incentive for greater/continued use of cars. While I recognise that this might be politically controversial it can be tested / implemented temporarily and iteratively to bring the public along – eg as was successful for Broadway and Times Square in

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	New York City. Some early tests once buses are removed could include closing the outside lane during peak hour for ride to work day, or closing the outside lane just at Northbourne Plaza for a month or two during the Design Canberra festival and leading into Christmas. Increased height **6. The proposed increased height should not be a windfall gain but be in return for public benefit such as affordable housing, architectural excellence etc** I support the proposed increased height for development along Northbourne Avenue but this should be structured in such a way to avoid windfall gain that developers will pocket or push land sale prices higher, but perhaps be only available as a concession/incentive following design review and in return for some public benefit such as affordable housing, architectural excellence etc. Alternatively rules to achieve these outcomes such as a requirement for affordable housing could simply applied across the board at the same time as height increases are implemented. **7. Further increased height elsewhere** There should be additional height to the RZ4 zones within MacArthur Urban Village – to increase population density here and particularly fronting MacArthur and Wakefield Avenues, themselves important avenues worthy of reinforcement with a strong built form. For example even something like 8 storeys on the north side of MacArthur and Wakefield would not overshadow the residences opposite on the south side (just the street), and could allow greater density on a smaller footprint meaning less overshading to side neighbours too. Also blocks fronting Mouat Street (eg from the Lyneham Motor Inn) and Anthill Street (eg up to opposite Section 72 Dickson) could be increased to 18m as proposed along Northboure Avenue to the north of here. Further the area of Watson between Phillip and Stirling Avenues should be 12m (not 8.5m) as it is opposite at Exhibition Park – perhaps all of north Watson facing Northbourne Avenue really should be 12m not 18m given 3-4 storey apartments are already on Anthill St Block 7 Section 74 and the Starlight Apartments Block 14 Section 64. These further increased heights are already somewhat indicated in Figure 3 Preferred Urban Form. Northern Investigation Area **8. Retain and consolidate Exhibition Park and the Race Course** I do not support Exhibition Park or the Race Course being moved elsewhere. With large crowds to events it is sensible that they are served by light rail. However I believe there is opportunity to develop the edge of the Race Course and consolidate/reconfigure Exhibition Park with it being the basis of a new mixed use precinct that can include high density housing. Perhaps a redevelopment of Exhibition Park could be the subject of an open design ideas competition. **9. Retain substantial green separation to Gungahlin – distinct edges and transitions between satellite towns ie the hills and ridges buffer is important both historically and for identity.** The transition along Flemington Road should be carefully considered. The Race Course, Exhibition Park, Crace Hill and Sullivan's Creek form an important zone that should be enhanced and reinforced as a threshold.

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	Future development of Kenny is important in this regard too. Perhaps there should be a substantial green spine connecting Crace Grasslands and Goorooyarroo and this can form a threshold between Gungahlin and North Canberra with south Kenny along Northbourne Avenue forming more of a community of interest with Watson, Exhibition Park and North Canberra than the rest of Gungahlin. In fact maybe the boundaries should be redrawn – eg south Kenny along with the Race Course and part of Exhibition Park (which are in Lyneham but are sometimes addressed as Mitchell) could form a new suburb. City for families **10. Ensure there is a diverse provision of housing including housing that is affordable and for families** I support the intention for there to be more diversity and choice in housing. High density 'urban' development areas should not only be for young professionals. There should be explicit provision for families, particularly with apartment typologies (not just terraces and townhouses) designed for families eg with 3-4 bedrooms, larger private open space, common gardens with play equipment etc (some European apartment buildings even include childcare eg famously Le Corbusier's Unite). There should be provision for affordable family sized housing in the inner areas too – currently there is generally a large price jump between 2 and 3 bedroom units. This would not be an unreasonable requirement given the proposed increase in height. **11. There should be a school at West Basin** Importantly with City to the Lake and other residential development in the city centre projected to have a population of 15,000, which is more than 3x the population of most Canberra suburbs, there should be a school at West Basin. Perhaps it can be a K-12 'vertical' (multi-storey) school and even share facilities with the ANU. The closest other schools are Turner, Ainslie and Campbell Primary Schools across many busy roads and respectively 30min, 30min and 50min walks from West Basin. Lyneham and Campbell High Schools and Dickson College are further still. **12. Families should be explicitly welcomed into the city's public spaces** I support the intention for a high quality public realm including upgrades to footpaths, pavements, verges, the Sullivan's Creek corridor and play equipment for families. Specifically public space in the city should be explicitly welcoming for families. I do not support moving the Merry-go-round to Glebe Park as suggested by In The City and the Property Council – families should not be relegated to the edge. The role of the Merry-go-round in the centre of the city's main shopping area and primary pedestrian malls can be reinforced – for example with an adjacent urban playground in Petrie Plaza west (eg like Tumbalong Park), engaging public art and a nice place for parents to get coffee and sit while they watch their children play. Human scaled public space **13. Public space in the city should be renewed, particularly City Walk and Petrie Plaza - high quality kiosks is a good suggestion** I do not support the various suggestions elsewhere to reintroduce cars to City Walk and Petrie Plaza. These spaces should be retained and upgraded. I support the suggestion in the Framework to introduce kiosks to public spaces and believe they could work well in City Walk and Petrie Plaza if *high quality*, such as Queen Street Mall in Brisbane - closing views so that spaces are more intimate, as well as bringing more activity and passive surveillance if required to operate outside business hours.

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	Also design guidelines are needed to ensure outdoor dining pavilions are better quality particularly in important locations like Garema Place where they should have a more civic potentially cohesive nature. Solar access to neighbouring properties and public space is prioritised **14. *Minimising* overshadowing of neighbouring properties and public space at mid-Winter is important.** I strongly support this intention to protect the amenity of neighbouring properties. The language 'prioritise' and 'minimise' is very important and would be an improvement on the current planning codes. While solar fences have been introduced elsewhere, at the same time protection for solar access in the Northbourne corridor has been progressively diminished. The language in criteria across the Territory Plan has been changed from 'optimise' to 'reasonable' solar access, and in the Northbourne Precinct Code there is an unusual rule that was initially mandatory but is no longer, that allows reduction to 2 hours sun between 9am and 4pm whereas elsewhere the rule is 3 hours between 9am and 3pm. I support increasing density in this area, however more careful design including with design review and more flexible rules on height and yield could significantly improve outcomes. For example the unit complex where I live has north facing units losing almost all of their solar access with a new neighbouring development of 200 units recently approved – if the new development instead was reduced to just 180-190 units or development was allowed to be higher in other parts of the site as compensation for a reduction of height against our boundary (but maintaining full height along Northbourne Avenue) then the solar access we retained would be substantially improved. Protecting amenity of public space is important too. The City Precinct Code has some protection for Main Pedestrian Areas and Routes, but could be stronger and more extensive. For example recent redevelopment of the previously stepped Canberra House (Mayfair Apartments) has substantially increased overshadowing of the Melbourne Building, while a new office building to the north of Veterans Park currently under construction has no stepping unlike the office building it is replacing. Walking and cycling **15. The proposed user hierarchy is correct – reduce pedestrian crossing wait time at all Northbourne Avenue traffic lights** I agree with the proposed user hierarchy. Traffic lights should be timed such that pedestrians can cross Northbourne Avenue at every signalled intersection without needing to wait in the median for the next cycle. This is the most frustrating experience – pedestrians should only have to wait once! **16. The proposed mid-block crossings are very important – and in Braddon there needs to be more (link up the laneways and arcades)** The proposed mid-block crossings are very important given the blocks are so long. In the commercial area of Braddon there is an opportunity to link up a fine-grain network of laneways and arcades – and this is critical as businesses in the arcades struggle without through traffic. This is also important to ensure that there are *viable* 'back' spaces for creative businesses and start-ups that originally made Braddon vibrant before the food strip took over.

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	Overlaying rights of way would have been easy when this area was previously rezoned before recent development. However it is still possible where there hasn't been development and where there has the ACT Government (perhaps via the City Renewal Authority improvement levy) can be responsible for necessary capital works to implement eg adjusting pavement, landscape and in some cases services, and progressively removing fences. **17. Active travel streets, particularly Forbes Street, should be implemented with measures to reduce shortcut through traffic as a priority early** Reducing shortcut through traffic could be a low cost early investment. Forbes Street [……..] has a surprisingly substantial through traffic load using it as a shortcut between MacArthur Avenue and Wattle Street and the City. Also there is only dim street lighting and many cyclists (it's already a signposted route) ride here without helmets, lights or bright clothing. **18. The proposed Garden City route is important, and it is critical that it is separated as proposed, however there are also other gaps in the key cycle network** There is a gap in the community routes to the west of Sullivan's Creek – particularly connecting between the route from Belconnen and Wattle Street, but this could also be extended to the south to O'Connor shops. It is great that improvements including footpaths being widened are underway on the east west connector streets, however the network should propose there to eventually be separated cycle lanes as for the Garden City route. Also the City Loop should be completed with an east west connection in the vicinity of Parkes Way (once the design for Parkes Way is finalised) and/or a connection between West Basin and Commonwealth Park.

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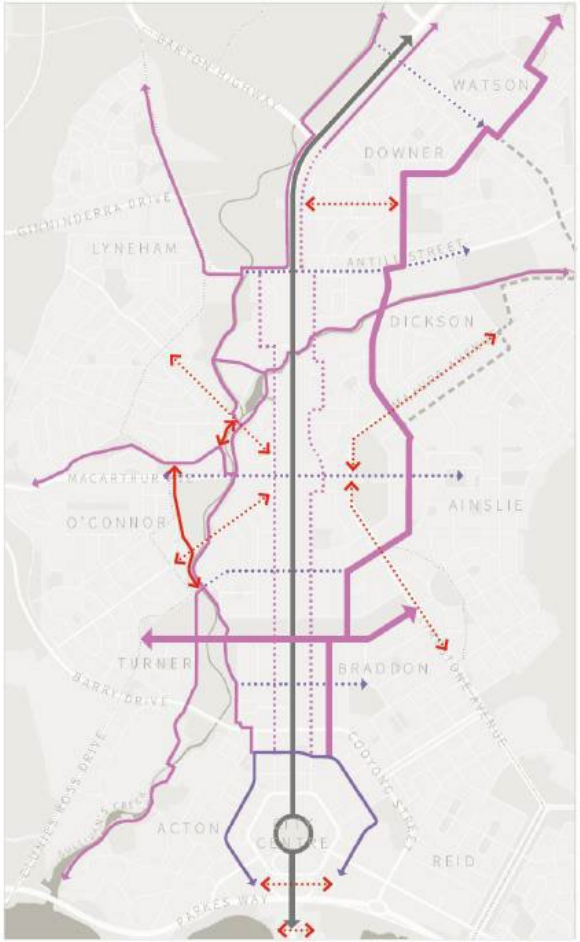
	Other key routes not marked that should be improved are along David, Wattle and Swindon Streets and Majura and Limestone Avenues.  Sullivan's Creek **19. Sullivan's Creek should be an exemplary landscape and is rightly nominated as important to place making** Sullivan's Creek should be fully returned to a natural-like state (no concrete drains). In addition to use for recreation, biodiversity, active travel and wayfinding it also can be used as a corridor for urban agriculture.

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	The idea of acknowledging the cultural rights of and engaging Aboriginal people could be particularly significant and I encourage it's vigorous pursuit – what might a contemporary and urban idea of indigenous relationship to landscape look like?
137	Thank you for the opportunity to comment on this important and complex planning project, the *City and Gateway Draft Urban Design Framework* (CGDUDF). **1. Much to be endorsed in CGDUDF** The following are useful guiding principles and ideas: • Commonwealth Government and ACT Government working on this 'joint venture' • Transition concept for an avenue that travels from bushland, peri-urban, urban & to the inner city that literally culminating with a magnificent vista that sweeps south to the Parliament House of Australia, across Lake Burley Griffin then westward to the Brindabella Ranges. • Sustainable designed architecture with an emphasis on excellence • Emphasis on people/pedestrians/bicyclists • Reduction of vehicular traffic • Improved East:West linkages **2. Concerns and issues** The following do not appear to be adequately addressed: **Place making** Canberra is the national capital and as such, Northbourne Avenue, one of the main entrances to this place of national significance, carries certain expectations with it. The very essence of the landscape qualities need to be maintained specifically low building heights and the glorious vistas that can still be viewed along the Griffins' axes and certainly still visible along Northbourne Avenue. We most certainly do not need the big-city tousle and do most certainly need to preserve the big-sky beauty! The 'ceremonial functions', presumably relating to international diplomacy and national representation, to commemorative and celebratory events, are best carried out in an unpretentious but distinctive way along Canberra's avenues and/or boulevards. These carriage ways must be lined with buildings of design excellence that are exemplary examples of environmental sustainability complementing, not compromise the topography. **Representation and diversity** Representation and celebration of the diversity of Australian history, culture and society needs consideration and manifestation possibly by sculpture, street art, or other possible installations. Therefore, space needs to be set aside for this along the avenue to reinforce place making and the avenue's significance. While the partnership between the Commonwealth & the ACT governments is welcome, the policy fashion favouring subsidiarity should not be allowed to become a manifestation of parochialism. This initiative is of national importance and long lasting. Hence, the avenue must be meaningful to

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	most Australians, inclusive of the diversity of the population with particular regard for Aboriginal input particularly from the Ngunnawal and other Indigenous voices. **Broader engagement & consultation** Input from the rest of the nation particularly from school children should be invited. Today's children will be the citizens experiencing this avenue for most of their lives so it stands to reason they should be invited to have a say. While totally appropriate to engage the relevant Minister in this project, to confine consultation to informing the Minister for Regional Development, Territories and Local Government about the project, is an inadequate approach to genuine consultation and engagement. **Time** More time is needed for a project of this magnitude and complexity for genuine consultation, possibly even a national competition, even an international competition. **Lack of national vision** This avenue should be impressive in a distinctively Australian way. At the moment it appears to be mainly a way of providing high-rise accommodation and thus one could construe it is developer-led. The aim for this development should be to achieve design excellence of the highest quality. At present CGDUDF, although a considered document, does not achieve this. National recognition and indeed international awards should be the objective of such an extensive, profound and long-lasting change. **Traffic** Traffic reduction and diversion is proposed around Civic. Should the bus interchange be relocated? What impact will redirected traffic have on adjoining suburbs? The existing streets and roads were not designed to carry predictably larger volumes of traffic. Obviously it must be anticipated that there would be a significant increase in traffic flow in the inner north particularly along Limestone Avenue, Cooyong, Coranderrk, Currong, Booroondara and Euree streets, Ainslie Avenue and Anzac Parade. Anzac Parade is on the National Heritage List and many of the other streets bisect or adjoin Alt Crescent and the Reid Housing Precinct – both areas listed on ACT Heritage Register, *Heritage Act 2004.* How will the impact of increased traffic flow be ameliorated, noise and congestion avoided, not only on the eastern side of Northbourne but also on the western side? How will the amenity, and in specific instances, heritage values, of these inner northern and southern suburbs be protected? **Environmental considerations** Why is there a need for massive heat banks along Northbourne Avenue? Any plan of this scale should be looked at from best practice environmental modelling and implemented to avoid heat bank issues. Obviously as much green space in the immediate vicinity must be conserved. This should include space set aside for urban gardens along the avenue, wide verges, green walls and wide-canopied trees. Token roof gardens and postage-stamp enclosed gardens within high-rise apartment blocks are totally inadequate. Keeping the current green space should be a priority. West Basin is a precious asset in offsetting the heat generated by the building bulk of central Canberra, including New Action, and should be retained as such and as a people's park. The CGDUDF needs to be modelled by CSIRO so that the urban heat bank effects can be identified and, accordingly, measures taken to reduce impacts of climate change as much as possible. Concrete surfaces or some light coloured road surfaces along the avenue should be used to also reduce heat bank

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	effects. While 'sustainability' is mentioned there appears to be a lack of leading edge environmental infrastructure: green walls, photovoltaic power systems, cool pavements need to be the standard. For the latter see www.epa.gov/heat-islands/using-cool-pavements-reduce-heat-islands. **Height is might?** Why should we seek to emulate the Shanghais and New Yorks of the world with horizons obliterated by skyscrapers? There seems to be a contradiction in terms with reference in CGDUDF to 'people first' and the proposal to increase the height of buildings that certainly has the effect of compromising 'human-scale'. The distinctive character of central Canberra is its low building height limitation that enables people to view vistas in virtually every direction with, thankfully, few transgressions thus far. Why should there be a race to render this place, Australia's national capital, like just any other major city, let alone other capital cities. Why should we adopt a priapic mindset that would over ride the remarkable, indeed unique, attributes of our national city? The place making of central Canberra is, and should be, distinctive, different from other national capitals. While there is definitely a quirkiness to be welcomed in the national zeitgeist, we surely do not have to resort to a theme park, a futsal court, let alone the 'damp squib', aka the Westside Container Village, constructed on Northbourne on the approach to Commonwealth Bridg **Planning and implementation** The Griffins' plan, despite various interpretations and corruptions (Ainslie Avenue for example) was, and still is, an example of advanced town and city planning. Obviously retrofitting what now exists is more complex than a clean canvas but the sound principles of good design need to be implemented here. Building engineering and architectural design standards are not sufficiently stringent in the ACT at this stage. A number of predatory builders have had a field day with the lax regulations, poor quality design environment and lack of enforcement of the existing regulations. Various reports from the ACT Auditor-General attest to this. Sadly, the experience of driving along Northbourne Avenue, now that trees have been removed during the construction of the light rail, reveals what could only be described as some of the most ordinary buildings in Canberra, leavened occasionally by some notable exceptions. Yet this is a (Commonwealth) Designated Area so how could this have occurred? The complexity of infrastructure development or augmentation alone is a huge task. Implementation would require management that is capable of developing and enacting new regulations, stringent oversight and proficient communication skills to keep people informed of the various processes involved. Do NCA and those involved in ACT Government planning agencies actually have the requisite expertise and resources to project manage such a significant project over such an extensive time frame? While appointment of a design review panel is to be commended just how such a panel would be selected needs transparency and its powers to enforce standards would need to be enforceable. Further, it would be desirable for some community representation to be included on this panel to ensure input from residents. Perhaps a mechanism could be found utilising the Combined Community Councils. **Compliance** The principle area under redevelopment, Northbourne Avenue, is a Designated Area and, as mentioned above, an area likely to be impacted with traffic redirection is the Australian War Memorial and Anzac Parade both on the National Heritage List.

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	By law, no-one can take any action that has, will have, or is likely to have, a significant impact on a matter of national environmental significance without approval. Any action that is likely to have a significant impact on the values of a National Heritage place … must be referred to the Australian Government Minister for the Environment (the Minister) for consideration. http://www.environment.gov.au/epbc/publications/factsheet-epbc-act-protecting-heritage-places What surveys have been undertaken to identify heritage in these areas? What conservation management plans have been put in place to conserve significant heritage aspects and how will the heritage values of these places will be managed? **Signage** While bound to be sorted out during the final planning stages directional traffic, pedestrian, bicycle, tram, bus signage should be carefully considered, properly trialled to prevent visual confusion. At present there is a plethora of signs that really amount to visual overload within half a kilometre of ACT border with NSW. **Other major 'gateways'** What thought has been given to ensure that people travelling to the national capital along the major roads or gateways from the west, south and east are aware of entering the national capital? There is the opportunity to consider design element common as place makers for these other major roadways that inevitably end up in the heart of Canberra. **People?** Much is made of people-first and human scale in CGDUDF but there appears to be no social, economic or environmental (including heritage) impact assessments to provide robust foundations on which to base rational decision-making. Further, there seems no provision for social housing, surely an oversight considering the recent displacement from this area of so many people requiring housing support. My best wishes for success with further planning for this major project.
138	*Submission withheld pending permission to publish.*
139	The redevelopment of Northourne Avenue and rejuvenation of City can make a substantial 'step change', improving Canberra's capacity to achieve net zero carbon emissions by 2045. Along with this, the redevelopment and renewal processes, present the opportunity to trial new land development and management models that will deliver, along with economic return improved outcomes in the four themes espoused in the Urban Design Framework – Urban Built Form, Access and Movement, Better Places and Active Streets, Sustainable Communities and Urban Culture. There is much in the City and Gateway Draft Urban Design Framework document (the Document) that is commendable, including the: • comprehensive planning approach and emphasis on good urban design; • broad principles and guidelines that reflect contemporary best practise;

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	• continued significance placed on the arrival sequence to the National Capital and how this created by the character of the landscape, from the woodlands to the urban settings; and • refinement of the strategies and plans in response to community and professional feedback, most notably the rethinking of the 'urban villages' to establish connections to other centres. However, because of the enormous potential for the redevelopment and renewal to catalyse change and make innovation 'mainstream', [Australian Institute of Landscape Architects, ACT Chapter] (AILA ACT) considers that it would be beneficial for the Document to: • ***Identify 'Living Infrastructure" as a key theme in the Framework*** A commitment to the investment of developing and managing the 'Living Infrastructure' should be made and highlighted in a separate heading under the section of "Proposed Steps to Implementation. Such a commitment would demonstrate the integration of the ACT Government's platform polices and more especially, to achieving the Draft Climate Change Strategy's target of the zero carbon emissions target by 2045. AILA refers to Living Infrastructure as Green Infrastructure. Infrastructure is considered by AILA to be a network of natural landscape assets which underpin the economic, socio-cultural and environment functionality of our cities and towns—ie the green spaces and water systems which intersperse, connect, and provide vital life support for humans and other species within our urban environments. Aligning the discussion of the public realm and landscape design under one section of "Living Infrastructure" ensures that this is given the due consideration, similar to the Urban Built Form, Access and Movement etc. Even though the document highlights the importance of the public realm and the quality of its ***landscape architecture**** to establish public amenity and more sustainable urban living, the separate discussion under each of the themes fails to deal with what is essential to achieve these outcomes; namely the o connectivity of the public realm and its treatment; o integration of the design of activities, planting and drainage; o ensuring diversity; o and consideration of appropriate management regimes. Raising the "Living Infrastructure" to a key theme allows the Document to more clearly set out the: o crucial public realm connections; o diversity in function and treatment of the the public realm in response to the land uses and built form: and o 'performance criteria' for environmental amenity (e.g shading of streets) • ***Include Time Frames for reviews and/or audit.*** Incorporating these would provide feedback on the merit of the policies as well monitoring any shift in the baseline conditions. As the redevelopment and renewal will be over several generations, building in a process of regular review to update the polices and guidelines as values, technology and he environment

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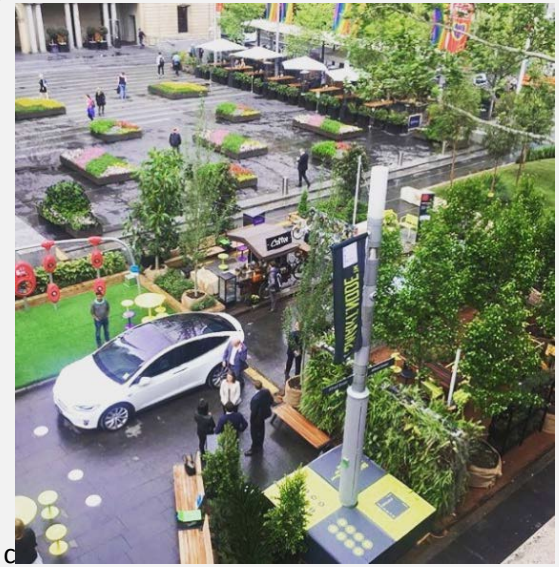
	change should prolong the 'life' of the Document. Audits and reviews are of course valuable to informing and reporting back to the community on progress and success. • ***Nominate and commit to undertaking trial installations and projects*** Because innovation is critical to getting a step change and because this redevelopment should be exemplary, AILA ACT recommends that consideration be given to undertaking projects that will raise the awareness and expectations of all stakeholders. Projects like the AILA *Future Street* (see below) are invaluable to exploring alternative design and delivery options. **Future Street** Future Street was a public activation, demonstrating the design concepts and technology for our future public spaces. Transforming a prominent Sydney street and reclaiming it for the people of the city, Future Street sparked ideas about how these spaces could be different and what that means for the community. Future Street reinvigorated Alfred Street in Circular Quay for a four-day activation, changing the way people used the street and educating them on the technologies of the future. Showcasing the latest developments in technology, the importance of a greener and more inclusive street, Future Street engaged members of the public as well as members of industry.  **Image**: *Before and after shots of Future Street, Alfred St, Circular Quay*

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	AILA advocates for NAC: 1. to embrace our streets as important public spaces that can generate and produce opportunity for our communities, and not just harm and pollute them 2. to design and the build of streets to be greener, more complete and smarter 3. amend policy and regulatory requirements to facilitate the design and management of streets in accordance with the Future Street approach. Canberra is renowned for its planning heritage and, for being the Capital in the 'Bush'. It is also the legacy of some big ideas and risky moves from architects, planners, its political founders and sponsors. The AILA ACT encourages the ACT Government (and the National Capital Authority) to continue building on this reputation and legacy, maximising what it might gain by experimenting with new administrative and economic models to deliver a 'step change' in Canberra's urban form with the redevelopment of Northbourne Avenue and City.
140	After review and consideration, [.....] recognises the need for a master planning activity relating specifically for the Exhibition Park in Canberra (EPIC). DISCUSSION It is our view that priority should be given to the EPIC master planning activity to ensure: • Commercial certainty is provided to private and government sector business held and proposed for the venue and; • Projected currently lost Government commercial gain is recognised In its current state, the Framework does not provide sufficient review of the corridor to include EPIC.
141	Introduction: The Canberra Business Chamber in collaboration with the Master Builders Association, Property Council of Australia and Consult Australia welcomes the opportunity to put a submission to the ACT Government on the City and Gateway – Draft Urban Design Framework. We recognise that the Framework is intended to be a high level strategic document that should not be prescriptive in nature and will need to be supported by detailed planning regulations and controls. We have considered the Framework and are broadly supportive of a plan for the city and gateway into Canberra. It is recognised that a plan provides a vision for the corridor leading into Canberra which will provide the context for building and development into the future. Discussion: *The Framework* The Framework is a key step in providing the community insight into the ACT Government's thoughts on redevelopment of the city and gateway. Once the Territory Plan amendments are adopted investors and the community will be able to comprehend the aspirations of the Framework which will provide certainty for investors on leased land. The Framework references the need for further detailed work, including such things as an Infrastructure Plan (for the entire corridor both now and into the future), an open space and landscape plan and the like. These will be critical in providing a holistic approach to the implementation of the Framework and ensures that there is consideration of all aspects that relate to the built environment.

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	The open space and landscape plan will need to detail the urban landscape improvements that will be completed in public spaces, such as road corridors, parks, and other open spaces to realise the Frameworks ambition. In its current state the Framework does not provide sufficient flexibility to accommodate for the unforeseen implications and impediments that will arise from the detailed work in developing plans such as the Infrastructure Plan. The success of the Framework will depend on this flexibility. Immediate Action: In addition to our views on the Framework we believe that priority should be given to: 1. Both levels of government being adequately resourced to prioritise the development and implementation of the Framework and supporting planning controls to ensure they are released in a timely manner in advance of further major investment in infrastructure. 2. Set timelines for the ratification of the strategy which then needs to be communicated to business and community. 3. Recast the Framework to include only objectives and aspirations – leaving the Planning Controls to detail the requirements. 4. The Framework should be given immediate effect, to provide greater certainty for developers who are currently progressing development approvals, prior to future Territory Plan amendments taking effect. Legislative change should be considered to allow the City Renewal Authority (CRA) to make determinations for those developments already in motion. 5. The immediate establishment of an infrastructure sequencing plan which illustrates physical, and social infrastructure that will be upgraded to support the development needs. Summary of Industry Views: 1. Clarity regarding the purpose of the Framework - The Framework as drafted is a mixture of high level aspirations, prescriptive requirements and detailed rules. For the Framework to truly endure it must be a set of aspirations and objectives agreed between the ACT Government and the National Capital Authority (NCA) with details included within the planning regulations. 2. The intent of the Framework should encourage and promote design excellence, sustainable design, diversity in building type, land use and housing mix. The industry needs to be provided flexibility to innovate. This flexibility could extend to the removal of the prescriptive application of the National Capital Plan Building Height Requirement of RL617. This rule places an unnecessary cap on development where greater height limits on key nodes and stations should be permitted. Consideration should also be given to the reduction of onsite parking as part of the strategy to promote mode shift to public and active travel which aligns with governments health promotion and Climate Change Strategies. Amenity of residents, relating too road noise from the corridor, should be a design consideration. The Framework also needs to clarify whether Northbourne Avenue is intended to be a movement corridor or a destination, or whether there are specific destinations and that the remainder of the corridor is a travel route. This will inform decisions about land use and activation.

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	Setbacks to Northbourne Avenue are important areas for landscaping and the maintenance of the corridor of trees. However, a blanket ban on set down opportunities is considered too stringent given the likely hood of decreased private car ownership and increased use of ride sharing services. The Framework mentions protection of solar access to public spaces but doesn't propose a specific policy. As this has the potential to have significant impacts on development potential the policy will need to be rigorously developed and applied consistently. This may be a matter for broader application across the Territory given some recent and current discussions relating to the Woden Town Square, Curtin Courtyard and Garema Place. It is not clear how the north-south active travel provision is to be prioritised, with options to use Northbourne Avenue, Active Travel Streets and other routes also available. The interplay between these active travel opportunities and future traffic arrangements needs more consideration, especially where current developments are being encouraged to channel traffic into the Active Travel Streets rather than the higher order roads. 3. Implementation of the Framework should be expedited to: a) Provide certainty for the private sector – Property Owners and Developers have been left in a state of uncertainty with what planning controls govern potential development sites. This level of uncertainty detracts from the ability to make commercial decisions on developments and deters private sector investment. b) Realisation of urban renewal under the Framework - The Canberra business community has been awaiting the publication of the Framework for many years. During this time the city has continued to develop with construction of light rail, public housing renewal and redevelopment of numerous sites along Northbourne Avenue and adjacent suburbs. The benefits of the Frameworks will not be realised if further delays in the implementation continue. 4. Quality in design should be the focus of the Framework - With an increased population, the effective and efficient use of public spaces will also become important for liveability and community wellbeing. An area wide strategic plan that clearly articulates the needs of residents and identifies how those needs will be met through existing or new greenspace and living infrastructure will be critical in gaining community acceptance. This strategy can also then incorporate climate change/sustainability elements. 4 5. Density as key outcome. The Framework does not consider densification as one of its planning principles. The Framework is more focused on building heights as the main parameters for its spatial design. Consideration should be given to defining the densification target for the corridor. This will allow better and more constant planning principles to be implemented and the private sector to respond innovatively to government objectives. 6. Further detail is required regarding the incentivisation for the development of the public spaces to ensure integrity of the Framework. More detail needs to be provided on the incentives that may be provided for the development of public spaces. A key feature of the Framework is the blurring of the lines between public and private outdoor space to enhance liveability, which is commendable. However, trade-offs that are not applied in a consistent manner can compromise the realisation of the Framework aspirations and provides further uncertainty regarding the requirements for development. An example of this is the 5 metre deep soil profiles to support biodiversity and other environmental gains. There is no discussion on cost share principles. Also, public realm aspirations have a similar mix of public good outcomes funded by private investment. The Framework uses road verges which will be a critical way of

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	providing functional open space, creating a sense of place and recreation areas. Developers that contribute or invest in the upgrade of these areas should be allowed reduced areas of private open space within sites. 7. Implications on planning controls outside of the Framework and land release need to be considered as part of the ACT Governments broader planning controls – this is particularly important given the Stage 2 Light Rail preferred route to Woden through the Parliamentary triangle and increasing housing affordability issues which could be amplified by further reduction in land releases. 8. Delays on Rezoning. The delay in finalising the Framework and associated infrastructure plan has created as level of uncertainty for property owners and investors within the corridor and adjacent suburbs. A number of decisions have been deferred and number of key sites are already under development before the Framework and associated amendments have been undertaken. Whilst this not only creates uncertainty, it is resulting in reduced opportunity to realise the objectives of the Framework, but also ability to achieve other ACT Policies, including ability to encourage inner suburban consolidation and carbon neutral initiative's. The introduction of the light rail and proximity of existing suburbs to Civic and Dickson provides significant opportunity for the Government to realise its urban consolidation agenda. The Framework foreshadows the future rezoning of parts of Watson and Downer for infill development. If rezoning is warranted, it should occur sooner rather than later. The extent of rezoning should be considered to other suburbs along the corridor, including review of existing restrictions and encumbrances that limit urban consolidation. Appropriate transitions of scale to the existing suburbs can be considered and built into any future precinct code. If rezoning is not actively pursued, the existing dwellings are likely to be redeveloped as new, high value single dwellings and will quarantine the redevelopment opportunities into the future. These may also affect the ability of rezoning opportunities, which may be constrained by established dwelling character. An additional outcome may be that investors will acquire the old homes and landbank them waiting for the rezoning at which time they will be demolished. This will result in poorly maintained dwellings and further resolution on loss of quality on the suburbs. Consideration needs to be given to discourage the development of high value single dwellings in higher density zoned areas and ensuring that government policy, such as Lease Variation Charge, does not result in reduced viability of medium density development. 5 9. The proposal for an urban village at Macarthur Avenue is supported, however it should not be at the exclusion of commercial opportunities at other sites along the corridor. Given the anticipated increase in population in the corridor (17,000 over the next 10 years) it is likely that a Group Centre scale development would be warranted, along with two additional local centres; one to the north and one to the south of Macarthur Avenue. This would provide for daily shopping needs of future residents within walking distance of their dwelling.

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	10. Consultation. Given the detail within the Framework and consultation undertaken, it is strongly recommended that consideration should be given to remove third party appeal rights for any proposal that complies with the policy Framework, or/ and, that which has been determined by the Design Review Panel. Third party appeals by either community objectors or commercial objectors will slow down the implementation of new development. As a minimum, the proposal controls need to be considered in relation to potential review or provide greater ability for decisions within the corridor to have pre-hearing to rule out that vets out spurious or vexatious appeals. Conclusions: Overall the high-level ambitions articulated in the City and Gateway – Draft Urban Design Framework are commendable and are further enhanced/reflected in the upcoming planning strategy refresh process. In addition, the timing of such initiatives is imperative to capitalise on the benefits that the ACT Government is trying to achieve through this Framework. The ACT Government and the National Capital Authority need to prioritise and adequately resource the ongoing development and implementation of the Framework in advance of further major investment in infrastructure, including Light Rail Stage 2. The Canberra business and property community are committed to the sustainable growth and prosperity of the Canberra economy and of the region. The City and Gateway – Draft Urban Design Framework provides a sound basis for building the detailed planning controls needed to enact the broader vision. The Chamber and supporting contributors would welcome any further discussions on the matter any further assistance we may provide to facilitate this work. 6
142	*Submission withheld pending permission to publish*