

Submission on Woden District strategy in draft new Territory Plan

There is a major disconnect between the overall goals of the draft New Territory Plan, and the actions and plans proposed for the Woden Valley, specifically the Curtin area. The former is replete with statements about protecting the environment, reducing urban heat, improving amenity and so on. The latter has serious defects, in proposing strategies that will achieve the opposite.

In particular:

Urban in-fill sounds like a good solution to problems of urban sprawl and population growth. But if it comes with reductions to local public urban space, and increased urban heat with trees and soft plantings massively reduced, then it's a dangerous long-term failure. It will only succeed with a strong – and robustly managed – requirement for a minimum of 40-50% tree canopy cover on every block.

In addition, there must be a maximum limit of 4 stories (including underground carparking) for all buildings in residential zones – ie RZ1, RZ2, RZ3 and RZ4. The idea of increasing the number of dwellings on a block can only be acceptable on blocks larger than 800 square metres, with each dwelling fronting on to the street. Otherwise, there will be no tree or green cover and we will continue to perpetuate the ugly, vast, garden-less houses that are so contrary to the idea of a garden city in the bush capital.

Providing these standards are maintained, the beauty and enjoyability of living in suburban Canberra can be maintained, as well as ensuring that the trees do their job of cooling where we live, in a time when Canberra is only going to get hotter.

Similarly, the current proposals in relation to the Yarralumla Creek precinct will only serve to make a mockery of the idea of a blue-green network. The corridor is constantly used by the community from dawn to dusk, as I know well from years of walking through it. It's used by children and adults to walk or cycle to/from school or work safely – the roads (major and minor) haven't been designed to accommodate bicycles, let alone e-scooters. It's used for recreation – walking, cycling, playing, and is much loved, so its preservation and enhancement should be strongly supported.

However, the present proposal for a new 'edge' street, especially one with 3-12 storey buildings, runs completely contrary to that valuable goal. It would visually and physically separate people from the Creek green space, and indeed would reduce the green space (and reduce tree cover) while jamming it in between the noisy, big road of Yarra Glen, and a new rat run which is what the edge road would become.

Why on earth is an 'activity hub' proposed for the Yarra Glen roundabout area? Nuts! That's a flood area and a heat island – remember people died there; and the little wetland gardens that commemorate that are a living reminder of that. Plus, how would you get to such an area through so much traffic?

The 'local centre' on Theodore Street is badly mis-named. I lived for 20 years up the hill from that block and am very familiar with it as a restaurant. Daana has made it a good local restaurant but there was a long period between it being a Bellucci's (also successful) and Daana when it was very unsuccessful. Parking is very limited and in the evenings cars would park up James Street almost to my house in Wilson Street. The block is the same size as my then-house up the hill, and it would be better to rezone it as RZ1 or RZ2 along with all the surrounding dwellings.

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The former Curtin horse paddocks offer an excellent opportunity to get the planning right, for the long term. I believe that means ensuring maximum building heights of 3 storeys, in keeping with the surrounding residential areas of Curtin and Yarralumla. It means, as argued above, a maximum of 40-50% tree cover on every block. It also means good pedestrian and cycle paths woven through the area and linking it, via a non-vehicle bridge, to the rest of Curtin. Plus it offers a good opportunity to provide green spaces for recreational use by the community.

Finally, it is vital that planning decisions are based on input and review by the community which is affected. That means genuine consultation, in several iterations, not a fly-by-night lick and promise which has accompanied far too many planning decisions in the past. It's also very important that the planning system has clear priorities and open, transparent processes for dealing with conflict between different objectives, and ensuring that community views are heard and taken into account.

For example, it took a lot of hard work to persuade the Territory planners to include protection of solar access when the development (a truly ugly one at that) of an apartment building was approved for the Curtin Square. The new Territory plan ignores this and would reduce solar access in the Square. By increasing building heights and reducing the 5m 'solar fence' around the Square, the result would be significant overshadowing in what is the heart of the Curtin community. Sunlight throughout the day, winter and summer, is fundamental to our amenity. It is seriously disappointing that this battle has to be fought all over again.

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28 February 2023

SUBMISSION TO DRAFT EAST CANBERRA DISTRICT STRATEGY – [REDACTED]

28 February 2023

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I am an Environmental Science graduate, with experience across 26 years in State, Territory and Federal public services in environment and heritage portfolios, plus more than 22 years as a consultant in environment, heritage, and community participation.

A particular focus has been on heritage research and documentation, and professional interpretation of heritage places and landscapes.

ABSTRACT

This submission proposes modification to a defined Change Area in the Majura Valley to:

- ◆ re-define land across the central valley as a 'Landscape and Rural Setting Precinct'
- ◆ protect biodiversity and heritage values in a landscape approach, rather than as disconnected and unrelated points on the map
- ◆ enhance protection of both surface waters/riparian areas and the significant groundwater aquifer
- ◆ diversify economic access and opportunities, including new tourism opportunities; and
- ◆ couple these benefits with innovation and best practice in local agricultural and food production.

A PRELIMINARY COMMENTS

I welcome the use of a District Planning Strategy to initiate dialogue with the ACT community in exploring possible land uses and discussing drivers and options.

More specifically, I welcome the recognition that some Change Areas need to be planned to 'take into consideration' existing rural uses, heritage and environment values.

I have some concerns that the District Planning Strategy:

- ◆ does not emphasise protection of the extensive groundwater aquifer in the Majura valley
 - ◆ may serve to perpetuate the longstanding view that rural land in the ACT has value only as a backdrop to the city, or as a bank of land waiting for a good use to be found for it
 - ◆ appears to not view people living and working in the Majura valley as a community (probably, as rural landholders, related to the above)
 - ◆ (based on the summary map of Change Areas) leaves quite large gaps in the Majura valley with no stated intent, which may bring little clarity for landholders in those areas
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B BACKGROUND

The heritage values of the Majura valley have been asserted and recognised for decades.

‘Majura House’, for example, was nominated by the National Trust to the Register of the National Estate in 1983. The Heritage Task Force, following achievement of self-government, recommended its addition to the ACT Heritage Register in 1989, and the nomination is still pending. The ACT Heritage Unit became more involved with ‘Majura House’ from late 2020-early 2021.

Numerous studies in the valley since the 1990s have reinforced heritage values that include but are not confined to ‘Majura House’, with little by way of tangible outcomes.

In the meantime, a number of landholders have been without a lease since 2005 (when 50-year leases were not renewed), remedies being complicated by protracted negotiations with the Commonwealth over ‘split blocks’. While this appears to be resolving, these landholders have had neither certainty nor clarity, which threatens their livelihoods and reduces their capacity to borrow and invest in care of the significant assets within their landholdings.

In the past decade or so, there have been no such delays in planning for infrastructure projects and broadacre development in the valley. The upside is that, through commissioned surveys, heritage values (both First Nations and European) have been reasserted, and additional biodiversity assets in grassland and woodland ecosystems have been discovered. In this way, delayed implementation of development has benefited the ACT as a whole.

In 2011 the ACT Rural Landholders Association with the Molonglo Catchment Group prepared a report on ‘sustainable farming in the Majura valley’, which outlined the aspirations and ambitions of landholders as a showcase not only for responsible and sustainable production but also for integration with protection and enhancement of environment and heritage values.

The same landholders have had to wait decades for clarity, and have faced significant disincentives. Those who have not been compelled to leave have maintained their belief in a different and better future for the valley, as part of a sustainable Canberra. And it is clear that there is a growing constituency of people in Canberra and district who share in some way in that vision, and are willing to act to help bring it to reality.

The current District Strategy is an opportunity to place some solid foundations under that kind of vision, after (too many) decades of indecision.

C PROPOSAL

I propose a modification in the central Majura valley, as a more discerning application of the stated intent. This would split the broad designation of the central valley as one large ‘Change Area’, and re-designate the northernmost section (at least), in a band right across the valley, as ‘Landscape and Rural Setting Precinct’.

The summary map refers to ‘taking into consideration...heritage and environmental values’. This process can be reactive - squeezing development around selected spots on the map - or it can be proactive - reversed in intent to identify firstly ‘things we want to keep’ in the landscape and seeing what spaces remain for development that would work with those values.

The central valley hosts numerous places, and aggregations of places, known for decades to have value in biodiversity (grassland, woodland, riparian), cultural heritage (Aboriginal, European, military, Federal uses) and water resources (surface and groundwater flow).

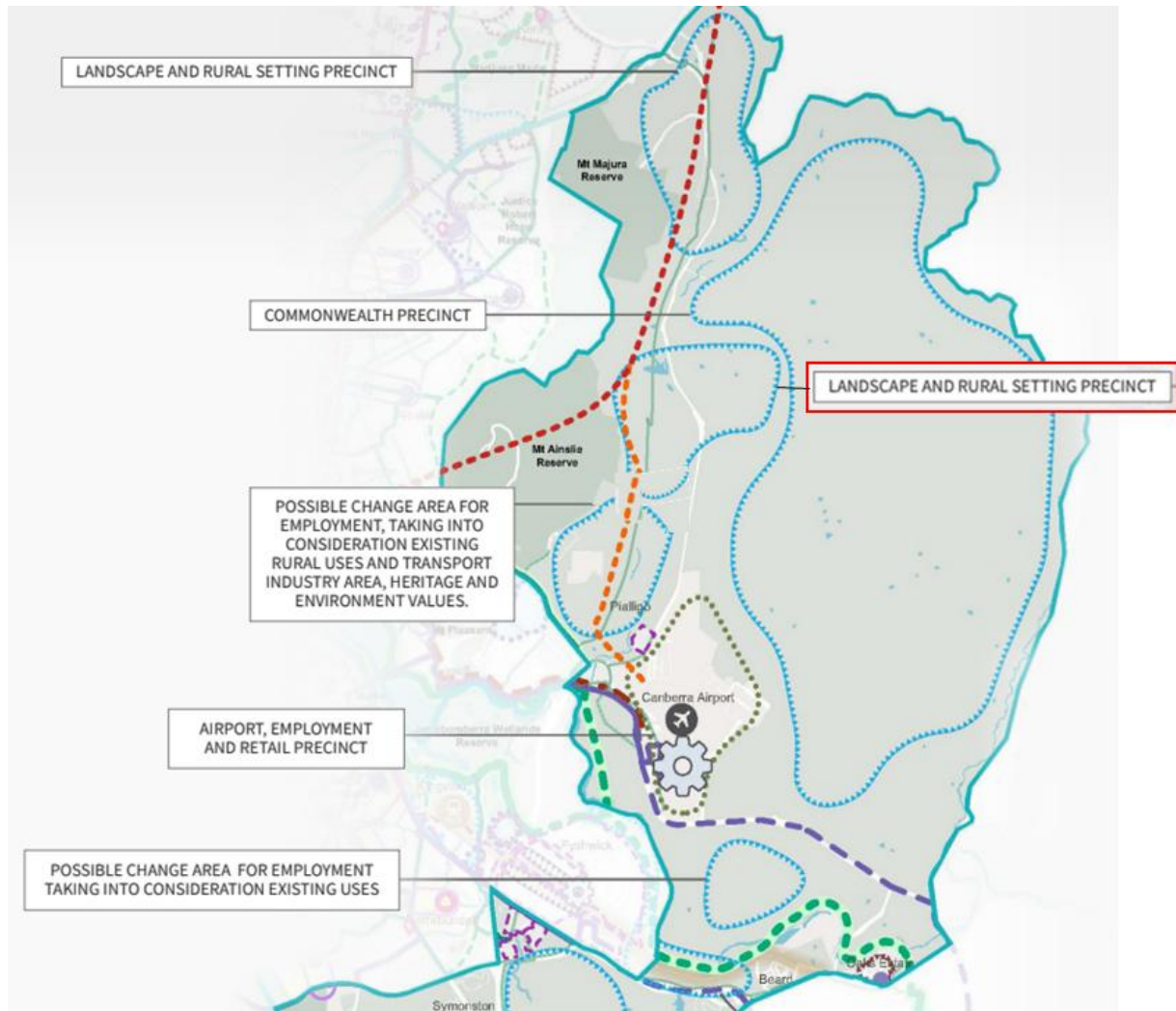
These overlap with places that are demonstrating innovation in agricultural and food production, and sharing sustainable practices that will become increasingly important in the face of climate change.

There is a singular opportunity in this part of the District to link these places in a showpiece of integrated planning that links sound understanding of the past with what we need to do for a sustainable future.

That suggests the need for a systematic landscape approach rather than a site-by-site, piecemeal, reactive approach.

The focus (sketched indicatively on an extract of the summary map below – label edged red) would be in a band across the central valley:

- ♦ *west to east*: straddling the old Travelling Stock Route from the Ainslie-Majura saddle to Majura Road, then through the old informal village of Majura and through ‘Gladefield’, to link to the Defence area
- ♦ *south to north*: broadly the corridor of Doughboy Creek with a short line extended to Mount Ainslie Reserve, to the southern edge of the Majura Pines and the AFP complex.



A sound case can be made to extend this Landscape and Rural Setting Precinct further to the south (but north of the Airport, Employment and Retail Precinct).

If some landholdings further south remain within a Change Area, that does not obviate the value of this kind of systematic landscape approach for achieving better outcomes from the process of ‘taking into consideration’ environment and heritage values.

D BENEFITS

With reference to the Drivers defined in the District Strategy Plan:

This proposal would contribute to the *Blue-green network* by providing:

- ◆ direct **protection** to grassland and woodland ecosystems, and **connection** between these
- ◆ direct **protection** to notable cultural heritage places, and **connection** between these
- ◆ a measure of **protection** to watercourses, riparian areas and the extensive groundwater aquifer of the valley, and opportunities to educate about the **connection** of these to biodiversity and historical land use patterns (both First Nations and European)

This proposal would contribute to *Economic access and opportunity across the city* by fostering:

- ◆ retention and enhancement of local agricultural and food **production capacity**
- ◆ **innovation** in agricultural and food production and agribusiness
- ◆ **opportunities** for thematic tourism e.g. heritage-based, sustainable agriculture-based, working farm experiences (at the 'doorstep' of the airport and the city)
- ◆ a visually pleasing and stimulating north-eastern arrival **gateway** to the city, having retained scenic amenity of the central valley

This proposal would not conflict with *Strategic movement to support city growth*, specifically alternatives for high speed rail through the western margin of the valley.

It is recognised that this proposal carries opportunity costs by reducing the area available for broadacre uses in the central valley. Some land development revenue foregone here would be well worth the gains in protection and connection of important assets, which once lost could not be regained.

There is plenty of precedent for this kind of revenue foregone in favour of other values: in the 1980s the Lanyon Landscape Conservation Reserve replaced plans for extensive residential development, as did the Mulligans Flat Nature Reserve in the 1990s, and multiple similar areas in the broader Gungahlin strategic assessment and its aftermath.

E LANDSCAPE AND RURAL SETTING – PRINCIPLES AND AIMS

Landscape is more than a setting – it is a character/active player in the way people use the land and respond to changes in the environment.

Advocating for recognition and protection of cultural landscapes is by no means new but has gained relatively little traction in planning and management practice when compared with landscape approaches taken to protection of biodiversity (for example).

This is despite research that suggests that many people value highly (even prefer), and find more personal association with and meaning in, landscapes that display both beauty or grandeur and evidence of human use (buildings, fences, paddocks, wind pumps, grazing stock, and the like).

Natural landscapes and cultural landscapes are by no means mutually exclusive – every natural landscape contains human traces, varying in degree. This strengthens a landscape conservation imperative and enriches interpretation of what is being protected – linking the **physical** environment and the **people** in it.

And this view of **interpretation** encompasses much more than information, creating perspective, a true sense of place, valuing, and acceptance of a responsibility to care.

The approach:

- ◆ interprets the passage of time, demonstrating both **change and continuity** in the landscape
- ◆ recognises each landscape as a particular **combination** of landform, vegetation and water (surface and sub-surface) which shapes layers of human settlement and use, and how these affect the landscape in turn
- ◆ recognises each landscape as a **system** of flows and processes rather than as a catalogue of points on a map, or disconnected, seemingly unrelated places

More specifically, the approach applied to Majura valley would:

- ◆ present and interpret the heritage and educational value of a landscape born of 25000 years (at least) of First Nations presence, and a **working pastoral and agricultural landscape** born of 200 years of European occupation
- ◆ present and interpret the values of **small holdings worked by ordinary people**, as an essential component of Australian pastoral history, identity, and sense of place (beyond the heroic pioneer models, grand homesteads, and grazing empires)
- ◆ provide opportunities to experience aspects of ways of life, quality of life, and rural identity

This Landscape and Rural Setting Precinct would be an **innovative approach**, noting that few others are evident in the ACT. Perhaps the only example is the Lanyon Landscape Conservation Reserve - a 5000ha special purpose reserve, originally reserved in 1985 to protect the historic rural landscape of Lanyon Homestead.

At Majura valley the proposed Landscape and Rural Setting Precinct would be a **distinctive landscape**, contrasting with the Lanyon landscape – with very different landform, vegetation, and historical pattern:

- ◆ Lanyon (with Lambrigg) represents the cultural landscape of a grazing empire; with a mountainous backdrop to a plain 4-5km broad; and a significant river shaping historical use; whereas
- ◆ the central Majura valley represents the cultural landscape of small selectors, and small landholdings that followed establishment of the Federal Capital Territory and breaking up of the ‘Duntroon’ property; based on a small creek and abundant groundwater; in a valley up to 8km wide, with a long view towards the Monaro, which proved so attractive to European exploration from the 1820s.

F RECREATION AND TOURISM

There are equally distinctive opportunities for recreation and tourism, particularly based in environment and heritage.

A concrete example of the potential depth and breadth of this is the 2017 Majura Valley Bush Festival. This was staged by the valley community with associated community-based organisations e.g. Majura Landcare Group and Molonglo Catchment Group (now Molonglo Conservation Group).

The event sought to: 'celebrate the people, history and stories that make up the unique heritage of the Majura Valley', and to showcase the working farms and produce of the valley. It was staged by more than a hundred volunteers.

It was well-attended, attracting participation of thousands of visitors with a wide range of opportunities, including:

- ◆ paddock-to-plate catering with local produce (lamb, beef, garden greens, corn, honey, eggs, wine, beer, ginger beer, ice cream)
- ◆ a CWA Devonshire tea or Girl Guides wood-fire billy tea
- ◆ displays of farm activity and craft in whip-cracking, shearing, wood-chopping, whip-making, and saddlery
- ◆ an animal petting farm, merry-go-round, pony ride, horse-drawn hay ride, Cobb & Co coach ride
- ◆ equestrian riding displays, horse handling skills demonstrations, a working farrier
- ◆ sheep dog demonstration
- ◆ live country and folk music performances
- ◆ displays of heritage carriages, heritage engines, farm equipment and tools
- ◆ opportunities to visit the original Majura Post Office and the Majura Hall (normally closed to visits)
- ◆ open workshops to discuss First Nations land management, cultural life and language; hydrogeology and water management; riparian restoration; community care groups; investing in natural assets; Land for Wildlife; and farm tourism

Such an event demonstrates not only latent demand for these kinds of experiences, and interest in bush/rural heritage, but also the capacity and drive of the local landholder community.

Activities were staged on several properties that are located within the band proposed in this submission to be re-designated as a Landscape and Rural Setting Precinct.

Notably, they were staged on the 'doorstep' of Canberra International Airport.

G CONCLUSION

In the central Majura valley we have a distinctive rural landscape threaded with high priority biodiversity values, a suite of cultural heritage places and related objects, and surface and groundwater resources.

These assets are cared for by a community of capable landholders who are ambitious for what the valley could become – a showcase of sustainable agriculture and local food production, blended with enhancement of natural and cultural values, and enlivened by recreation and tourism opportunities.

The East Canberra District Strategy Plan offers an opportunity to protect this area and its assets from irreversible change, and to underpin the vision of the local landholder community, to the benefit of the whole ACT community.

Submission to ACT Government Draft Territory Plan and Woden District Strategy

We are writing to oppose the draft Woden District Strategy and also express our disappointment of the ACT Government in relation to the secretive manner of the attempted smuggling of it and the Draft Territory Plan through. The Woden engagement activities were not emailed, letter-box dropped nor promoted in any way at the various schools and businesses across Curtin, as one example.

The draft Territory Plan outlines future land use and infrastructure plan for the nine district regions and clearly puts real estate development before consideration of available land supply in each district region and sustaining existing positive community living as well as community development. There is no effort or acknowledgement in the draft Territory Plan concerned with embedding existing successful environmental and community balanced living.

Many concerns and contradictions exist within the draft Woden District Strategy in particular (<https://yoursayconversations.act.gov.au/act-planning-review/draft-woden-district-strategy>).

The first contradiction begins at the “Blue-green network” section (draft Woden District Strategy, p.99). It aims to: “Protect and enhance habitat for threatened species and their connectivity with green corridors and nature reserves including Mount Mugga, Oakey Hill, Red Hill, Mount Taylor and Farrer Ridge; and Explore opportunities to restore natural environments along Yarralumla Creek as part of an enhanced blue-green connection including potential for wetlands.”

It is impossible to see how levelling the green belt and building a road (and other “edge streets”) will protect and enhance threatened species and connectivity with green corridors (draft Woden District Strategy, figure 39). We have regular echidna visit our backyard (image provided) from Yarralumla Creek and have photographed Gang Gang cockatoos, red-rumped parrot and many others. We walk the Yarralumla Creek section from Yamba to Scrivener Dam or continue to Weston Creek frequently and one of us use the cycle path as the primary means for work travel by bicycle.



On this last point, together with increased primary school and Alfred Deakin High School student use, there has been a noticeable increase in e-scooter and e-bicycle use. Surely improving the shared pedestrian-cycle paths would be safer and more environmentally sustainable than levelling the green belt and building a road. A review of the Woden District Strategy to reflect the preservation of the Yarralumla Creek corridor a designated primary conduit within Canberra’s blue-green network would be welcome. This would ensure the continued positive value the community places on using this area.

The price of poor planning and under-estimation of the impact of the new suburbs of Wright and Coombs should not be paid for by the residents of Curtin. Rather than “edge streets”, safer and more efficient solutions are towards widening Cotter Road (or building an adjoining access road) in order for traffic to access Adelaide Avenue to travel south, for example. That area of higher ground along Cotter Road also makes more sense for property infill rather than the proposed flood plain area.

The next contradiction comes under “Economic access and opportunity across the city” that includes: “Develop the economic and employment roles of Curtin and Mawson group centres, improved connectivity to the future light rail corridor” (draft Woden District Strategy, p.104). The Woden

District Strategy proposes a “Local Centre” at Block 23 Section 29 near the Curtin Primary School (draft Woden District Strategy, figures 31 and 35). On the one hand the site is only 1039m², so there is very little space for development and likely no space for parking, and on the other it would increase traffic risks and associated pollution affecting the school across the road.

Another contradiction is found at “*Sustainable neighbourhoods*”, which includes the aim “...make sure they deliver the desired urban character...” (draft Woden District Strategy, p.111). Curtin already has an urban character and a very desirable one at that. One website describes Curtin as “...One of the innermost suburbs of the Woden Valley, Curtin has a strong sense of community, an active residents association and lots of lovely green spaces” (<https://zango.com.au/research/suburb/curtin-act-2605/>) and the Canberra Weekly website profile picture is the Yarralumla Creek corridor! (<https://canberraweekly.com.au/suburb-profile-curtin/>). The proposals in the Woden District Strategy are regressive and damaging rather than sustaining the existing strong urban community environment. Examples of improving sustainability would be to replace overhead powerlines with underground cabling, which would allow fibre optic access too. A focus on infill and consolidation only, without room for expansion in other key locations, does not respond adequately to demographic expectations and requirements for Curtin.

We consider there is very little logic or strategic rationale behind the proposed land supply of these Woden District areas, particularly Curtin. Although some research and earlier related reports are referred to in the draft Territory Plan, their relevance is questionable given the significant changes over the past two years in terms of where residents in Woden, and the ACT in general, are choosing to live and work (eg. from home and now returning to offices). The Draft Territory Plan should include a more nuanced discussion of the impacts of successive lockdowns in response to COVID-19, and the impacts and potential changes to the way Canberran’s in the nine districts will commute, live and function.

Transparency is a central tenant in the integrity of the planning system. It is equally as important in the context of “pro-development” decisions as it is in “anti-development” decisions. The decisions of the draft Territory Plan appear to be infected by ACT local politics and real estate property development interests. Both ignore independent and expert advice, and the proposals – somewhat coincidentally – seem already to align with public statements made by the Chief Minister and local candidates. Curtin residents are not naïve. We understand that planning debates attract community and political interest. There is undoubtedly a role for politics at the rule-setting stage, but once those rules have been set, we expect that proper planning processes are followed, and the rules adhered to.

In the context of the above, we encourage the ACT Government to fundamentally review key assumptions about land use and population forecasts underpinning the draft Territory Plan and the Woden District Strategy in particular. This review should include the re-allocation of residential land supply use away from the Yarralumla Creek corridor and flood plain, prioritising environment and resident safety issues, ensuring land use allocation is aligned with demand and population movement (not creating a short-term population spike), and importantly sustainability of existing healthy community environments.

Thank you,



28 February 2023

Draft Territory Plan Variation - Garran Primary School expansion

Thank you for the opportunity to comment on the Draft Territory Plan Variation. I am concerned by the impact this variation and the primary school redevelopment will have on traffic, particularly at peak times (school drop off and pick up) if Robson St is utilised for access. Kitchener St should be prioritised (note I have not been able to review the 'indicative masterplan' referenced in Purdon Planning's Planning Report).

1. All day parking on Robson St is encouraging vehicles away from Garran Shops. I don't believe this is compatible with the combined traffic volumes at peak times generated from Goodstart, preschool and a new primary school entry/exit on Robson St.
2. I have observed near misses with vehicles attempting to exit the Goodstart carpark and attempting to turn right onto Robson St and expect there will be similar issues if there is a new exit onto Robson St from the primary school expansion.

Additionally, parking in Boothby Pl and Mackaness Pl is currently unrestricted (no kerb). We already have issues with vehicles parking across driveways and in the roadway. These issues will only increase during construction and with parents utilizing these streets to park and walk their children to the school (something that we already observe with the primary school's current configuration).

██████████

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The whole planning legislation is actually, seriously flawed, including the new Planning Act, the Territory Plan and the District Plans.

The government has not explained what is wrong with the current system that can't be rectified.

It is supposed to be outcome oriented but what this means has not been outlined or defined.

We know of no other jurisdiction in Australia where this system has been tried.

The input from the community in the new system will be reduced.

There will be no pre-DA consultation. Residents will not be able to review what is built next to them. Consequently, there will be less certainty as to what can be built than there is now.

There will be fewer rules in the new system. Plot ratio, solar access, mandated planting space and private open space will be abandoned.

With fewer rules there will be less compliance . It is bad enough now. It will only get worse in the new system.

An unelected oligarchy (the chief planner and his colleagues) will have almost total control over what can and can't be built.

For the government to say that the new system will deliver better outcomes for the community is simply wrong.

COMMENTS ON NEW ACT PLANNING FRAMEWORK AND INNER SOUTH DISTRICT STRATEGY

I am a resident of Yarralumla with a young family and object to the Draft Inner South District Strategy for Yarralumla and surrounding suburbs. As a parent of future first home buyers I do not want to see my children deprived of what we most value in Canberra or priced out of housing. The Inner South District Strategy will destroy the character of the Inner South and perpetuate unaffordable housing for young first home buyers.

The Strategy direction for long term, large scale, high density urban infill, predominantly high rise with the requirement that 70% of new housing be in existing urban areas is inappropriate for Yarralumla and will demean the character of our home suburb. The proposed scale of redevelopment with 30%-50% of the residential area of the suburbs to become 3-6+ storeys apartments is excessive. Residents are opposed to this debasement of our suburb.

The low rise, low density character of Yarralumla and Deakin is cherished by residents and must be protected, along with its heritage and biodiversity. Densification is incompatible with maintaining heritage, biodiversity (native birds, mammals and insects) and the (already diminishing) Canberra tree canopy, which provides shade, habitat, space and the peaceful tranquillity so necessary for urban living. The Inner South District Strategy must ensure loss of tree canopy cover is reversed. The character of Yarralumla and Deakin as low density leafy suburbs must be retained. We do not want our suburb being densified and Gungahlinised into a conglomeration of ugly apartment blocks.

Yarralumla and Deakin now experience serious traffic diversions, traffic delays, parking shortages, peak hour traffic congestion, bottlenecks and commuter U-turns due to current road and building works. It has become hazardous to enter or leave the suburb at morning peak time. This will worsen with further large scale development, particularly if or when light rail to Woden is built.

The Strategy Plan at page 10 of the Inner South District Strategy shows a large area of Yarralumla imprecisely covered in yellow highlighter, marked as "Future Investigation Area". This swathe of yellow covers my property so I am alarmed about the implications for my home and family.

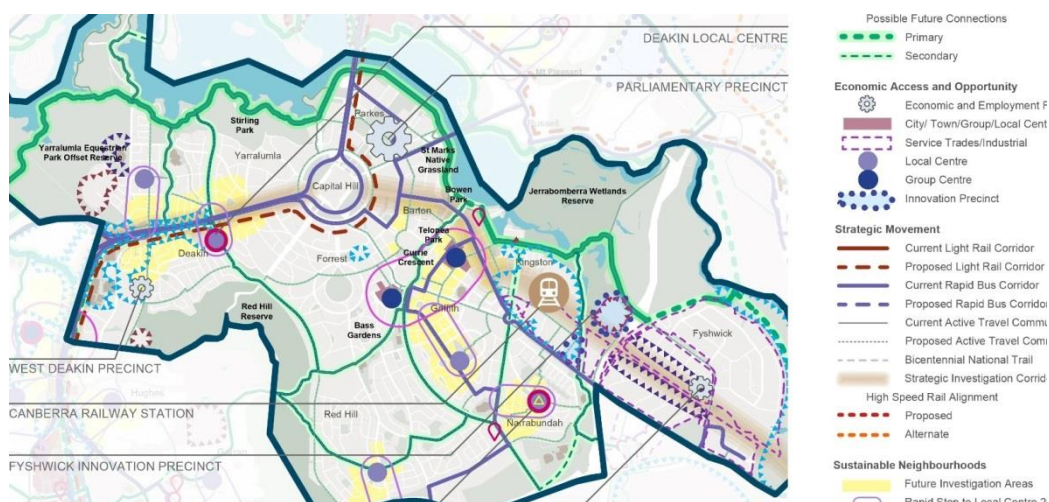
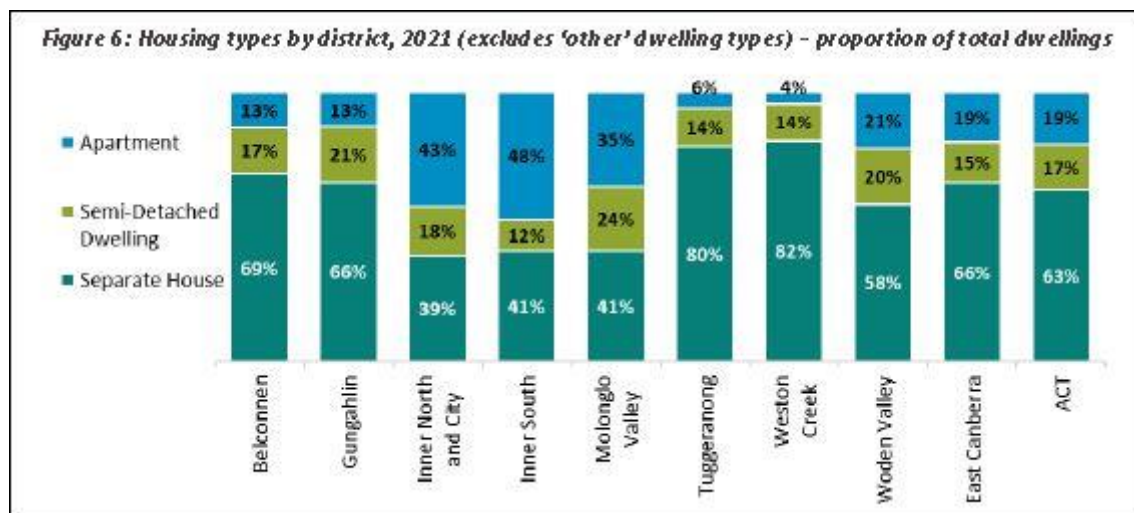


Figure 6, page 29 of the Inner South District Strategy shows the Inner South already has the largest proportion of apartments in Canberra. 48% of total dwellings in the Inner South are apartments, a greater proportion than any other district. The Canberra Brickworks development and the CSIRO Forestry redevelopment will add 730 new dwellings to Yarralumla, a massive 50% increase. The Inner South is already and comparatively highly densified with apartments, so should not be subjected to further infill and traffic congestion.



Planning Bill 2022 "s11(d) consultation is meaningful if ... (iii) "community views are genuinely considered and incorporated into final decisions". They have not. The Strategy ignores, marginalises and fails to satisfy the vast majority of Yarralumla and inner south residents. Our views on over-development have been articulated over many years, in numerous forums and represented by our Resident Associations. Proposing even more medium/high density development and ignoring long expressed resident opposition to excessive housing makes a farce of community engagement.

Urban infill can enhance and enliven a garden city, but not by cramming in as many people as possible, ignoring the impact on existing and future residents and diminishing that which makes Canberra a beautiful, well laid out, garden city.

Densification of the Inner South benefits large corporate apartment builders and property speculators by driving up land values, land prices and house prices. This just makes it harder for our kids, future young first home buyers, to find affordable housing in affordable areas.

Population growth and first home owner needs can be accommodated by the release and development of vacant land in outlying lower land value areas. This is where young Canberra first home buyers and families historically settled, not in expensive inner city areas. By withholding land from sale, the ACT Government drives up land prices, making it harder to acquire affordable housing. To restore affordable housing, vacant land, (eg south of Symonston and Fyshwick), should be released for sale and housing development. Releasing land will help meet current and future housing demand, stabilise prices and mitigate further densification of the Inner South.

Just as it claims to respect the relationship and connection indigenous groups have with country, Government must respect the affiliation and connection residents have to their home suburb. Our suburb is our home. Home is country. Country is home. The Inner South strategy of land appropriation and land conversion is a form of dispossession and just as offensive.

In 2014 an OECD report found Canberra to be Australia's most liveable city. We achieved this result by avoiding high density apartments, congestion, removal of green spaces, tree and habitat destruction, all of which will occur if this fundamentally flawed district strategy proceeds. A strategy of densification is a strategy to make Yarralumla, Deakin and Canberra less liveable.

Yarralumla Creek and Canberra's 'blue-green network'.

The Yarralumla Creek corridor is currently a beautiful, shaded, cool green space used by hundreds of residents, cyclists, dog owners and other Canberrans. My kids, wife and I use it for cycling, walking, playing and observing animals and plants.

The Yarralumla Creek corridor must be preserved and enhanced with full retention of green space and no new edge streets. The Creek and its surrounding area are important to the community for recreation, active travel and reducing urban heat. All the 'key sites' and 'change areas' for Curtin in the Draft Woden District Strategy involve the Yarralumla Creek corridor. Its value to the community must be preserved and enhanced in any changes. We welcome and strongly approve of the Yarralumla Creek corridor being designated as a primary connection in Canberra's blue-green network. We support restoring natural environments along Yarralumla Creek as part of an enhanced blue-green connection.

Key site and change area: Curtin edge north and south (the parts of Curtin closer to Yarra Glen).

A 'new edge street' through the Yarralumla Creek corridor, supposedly 'to clarify the urban edge to Yarra Glen', is not acceptable as it would destroy the amenity this treed open space provides for the community. The Yarralumla Creek corridor defines the urban edge to Yarra Glen perfectly well and the proposed street would significantly degrade the blue-green connection of the Yarralumla Creek corridor. Losing trees would increase the urban 'heat island' effect for this part of Curtin, which is not acceptable. Increasing the number of trees, together with retaining the open green space, would be a better blue-green enhancement than the proposed 3-storey dwellings on an edge street. Separate pedestrian and cyclist pathways for active travel are needed here rather than new streets.

A new street crossing Yarralumla Creek is not acceptable as it would significantly degrade the Yarralumla Creek corridor and destroy the amenity this treed open space provides for the community. It would also increase traffic in local residential streets.

A bridge for pedestrians and cyclists over Yarralumla Creek is strongly supported as it would connect the new residential area in the former horse paddocks with the rest of Curtin and its active travel routes. It would also open the north side of the Creek to community recreational use.

Key site and change area: Former Curtin horse paddocks

This is a greenfield site. Any development must reduce the impact of climate change: there must be a significant amount of treed public open space; 40% of residential blocks must be soft planting with 30%– 40% tree canopy cover on each block;

buildings must be no more than 4 storeys to enable cooling by trees. A bridge for pedestrians and cyclists over Yarralumla Creek is essential to connect this new residential area with the rest of Curtin and open the north side of the Creek to recreational use by the community.

Key site and change area: Woden north (the parts of Curtin near the large roundabout at the intersection of Yarra Glen, Yamba Drive and Melrose Drive)

The roundabout area is a significant heat island and is flood-prone. It is not a suitable site for more buildings. The best use of the whole area is treed parkland to provide a cool place for residents of the nearby apartments and to enhance the Yarralumla Creek corridor.

A new street between Holman Street and Theodore Street through the Yarralumla Creek corridor is not acceptable as it would destroy the amenity this treed open space provides for the community.

‘Local centre’ on Theodore Street, Curtin (site of Daana Restaurant)

The Draft Woden District Strategy must be amended to reflect that this site is not a ‘functional local centre’ as shown in Figure 31 in the Woden District Strategy Plan. Block 23 Section 29, Curtin (83 Theodore Street) is zoned CZ4: Local Centre but it is small (1039m²) and does not meet the functional definition of a Local Centre on page 159 of the Strategy: ‘Smaller shopping centres that provide convenience retailing and community and business services that meet the daily needs of the local population’. For planning purposes it cannot be treated as a local centre equivalent to those in Lyons or Hughes, for example.

Radburn area protection

We strongly support the Assessment Outcome to maintain and improve the existing ‘Radburn’ housing pattern.

General

More dwellings in residential zones (densification) must not be at the expense of the community’s health and wellbeing. A critical test for any proposed densification must be ‘no adverse impact on the health and wellbeing of individual Canberrans’. The proposed new Territory Plan and Draft Woden District Strategy fail this test as they would exacerbate urban heat, which will decrease health and wellbeing. More dwellings in residential zones must not be at the expense of public and private open space and tree canopy cover. The amount of local public open space must be maintained or increased. 40% of private blocks must be soft planting area with 30%–40% tree canopy cover on each block.

Planning must reduce urban heat, not increase it.

An overarching objective for the Territory Plan and the District Strategies must be to adapt the urban environment for climate change and to reduce its effects such as increased heat. Despite high-level policy statements, implementation mechanisms, such as the technical specifications in the draft Territory Plan, fall woefully short of what’s needed. Technical specifications for adapting to and reducing the impact of climate change are critically important: 40% of residential blocks must be soft planting area with 30%–40% tree canopy cover; buildings in residential zones RZ1,

RZ2, RZ3 and RZ4 must be no more than 4 storeys, preferably less, to enable cooling by trees.

Subdivision of residential blocks (Dual Occupancy Developments).

Subdivision of blocks in RZ1 (the zoning of most residential blocks) must preserve the existing character of these areas. To ensure this principle: minimum block size after subdivision of 400m²; all dwellings to front a public road or public open space; maximum building height of 2 storeys; and 40% of each block to be soft planting area with 30%–40% tree canopy cover on each block.

Finally, planning decisions must not be made without input and review from the community as these decisions affect Canberrans' everyday living over long periods of time. The system must include mechanisms to ensure this. The planning system must include clear priorities and open and transparent mechanisms to deal with conflict between different objectives.

Introduction

I am a qualified building design providing professional services in the ACT region. I'm concerned that current draft is still very much a draft. In the following submission I've detailed significant issues that I feel require a lot more work before the specification will be suitable for implementation. I also believe that a least one more draft need to be prepared and further community consultation undertaken.

[REDACTED]

3 Feb 2023

Format

Contained in this document are my comments about the *Draft Technical Specification - TS1 Residential*. These are divided follows:

- A) Comments about the overarching approach represented by the TS1
- B) Comments on individual *specifications* within the TS1

Comments about the approach

The draft *TS1 – Residential specification* feels like tinkering with the existing format and rules. The approach of 'combing and reducing' fails to address the challenges professional face when working with the planning rules. There need to be much more focus on making these easy to work with when developing and documenting a project for planning approvals. Specific issues include:

1. The TS1 still needs a lot more ruthless streamlining. The simplification of some rules such those covering solar envelopes is an excellent start. However, there is still more that could be done (see below). While there has been some simplification with incorporation of variation 369 the rules covering site coverage, planting area, private open space still have overlap and remain much more complex then they need to be. Further work should be done to combine these into a single rule covering.
2. More needs to be done to structure the rules based on *user needs*. There are too many situations where thematically related rules are fragmented across the specification and often overlap each other. This makes the specifications complex to use in real-world situations. For example, the rules related to site coverage, private open space, planting area, tree coverage etc function to control the ratio of building to site. Someone undertaking the design of new building has to jump all over the document when considering things like the size and the location of open spaces.
3. Many of the specifications are poorly written making them difficult to understand which will force users to continue rely on supplementary explanations. Problems include; long sentences, poor structure and vague logic. The sections covering *privacy* (52, 53, 54) is the worst example. The whole specification document should be re-written using [Plan English principles](#). Once this

has been done the specifications should be independently reviewed and certified for compliance.

4. The specifications should be made available as a web site with some smarts to make them easier to access and use. A well-designed web site could offer basic functionality such as a decent search and the ability to filters based on a user's context, ie only show me 'rules that apply to single dwelling residence on large RZ1 blocks', or topics 'show me rules related to site coverage'. Terms within the specification should be hyper linked to the *definitions* (which should also be a web site and not a PDF). The use of PDF should be discontinued. PDFs are terrible to read on mobile device and are often not compliant with good practice in accessibility.
5. There are too many instances where important planning rules remain outside of the specification and are administered outside of ACT planning. Examples includes: a) easements and utilities access handled by utilities providers, b) driveways, verge crossing and nature strips handled by Transport Canberra, c) groundworks around trees requiring endorsement of the Conservator of Flora and Fauna, and d) heritage by another agency. This approach greatly increases complexity for professionals managing all of the different planning approvals required for a project. Where possible these outlying rules should be combined within the specification. At a minimum there should be a consistent approach applied across all planning rules (similar formats, alignment of terminology, all available from single webs site, etc). The current approach of forcing industry professional to deal multiple agencies and organization running their own silos must be discontinued.
6. The specification is titled "residential" but there are a lot rules at the end of the document that only apply to commercial project, ie *parking* rules. These need to be relocated to a more applicable specification. Again, this does nothing to make the specification easy to use.
7. With the current codes there are lot of clarification and interpretation that are applied by ACT planning. These are poorly communicated and almost impossible to access from outside of the bureaucracy. With the new specifications this approach must be discontinued. There will be plenty of situations where additional explanation is required (this is a good thing!). However, these must be published in a transparent way (ie to a publicly available web site) and stakeholders must be able to provide input. To put it bluntly, it's no longer good enough for planning bureaucrats to 'make it on the fly' and then assume telling Building Certifiers is sufficient industry stakeholder engagement.

Comments related to individual rules

Control or Specification No	Comment
1	I'm opposed to the garage to setback of 5.5m in front of the house if a courtyard wall is included. This will fundamentally alter the street scape in established neighborhoods by encouraging the walling of front gardens to enable owner to push their garage forward of the existing dwellings. On large block there is plenty of space for garages to remain behind the building line.
9	Simplifier this by remove 'blocks before 1993'
52, 53, 54	The section is poorly written. It is difficult to understand how these rules will be applied. See point above about using Plan English principles . The rule mentioned <i>private open space</i> and <i>principle private open space</i> which are all over the Specifications.
64	Remove <i>Secondary Residence</i> from these requirements as this will be better covered by the upcoming accessibility rules in the National Construction Code.
71	Time to stop fragmenting the planning rules. One set of rules and one organization assessing planning compliance etc. Bring these rules into the code (or at least reference an Australian Standard). Stop sending users out to TCCS.
73	Drop the requirement for at least one roofed space. It increases building costs; folks won't die because their car was left out in the rain.
87	Extend this to cover all residential housing (single, dual occupancy etc). All dwellings should have provision for secure parking of at least one bicycle.
97	This needs clarification. What is the function of the required space – if it is for waste management bins etc then make this clear.
103 d)	The requirement for panels should be set out here, ie "the wall is made up of at least 25% slotted paneling made of timber or similar". The current statement is vague.
104 d)	This badly written "trees and/or shrubs" – again the authors need to familiarise themselves with plain English.

SUBMISSION CONCERNING DRAFT TERRITORY AND INNER SOUTH STRATEGY PLAN

Thank you for the opportunity to comment on the proposed draft of the new strategy for the Inner South.

As a resident of Forrest and of [REDACTED], I have a genuine interest in any outcome that pertains to [REDACTED]. And as the strategy for these adjoining sections is necessarily different, I will confine my comments to [REDACTED] and allow residents affected by [REDACTED] changes to comment appropriately. In this latter section, the overarching principles which apply are those relating to building height, setback, and the effect on traffic volume. Each of these principles has a direct bearing on the 'Garden City' concept and it is vital that they underpin any review of strategy for the area involved.

Regarding [REDACTED] I have specific concerns which I believe need to be acknowledged, addressed, and factored into any ongoing strategy. These concerns relate to safety associated with this section and safety needs to be enshrined as a basic principle underpinning proposed development.

1. [REDACTED] is separated from the Forrest Primary School by National Circuit. School traffic in National Circuit and Hobart Avenue is already extremely heavy at drop-off and pick-up time. This includes both pedestrian and vehicular traffic. As parking is at a premium, parents need to park as far away as the Forrest Bowling Club and Dominion Circuit and then walk to and from the school while crossing a very congested National Circuit. Many of the young school children cross this road unaccompanied by adults. My concern is that this is already inherently unsafe and any further development which disgorges traffic across the Hobart Avenue footpath, or indeed, into Hobart Avenue, will only exacerbate an already unsafe situation.
2. Before any future development in [REDACTED], two major intersections require upgrading. If this is not possible, then future development that increases traffic volume should be paused. The intersection of Hobart Avenue and National Circuit needs traffic lights. As a local resident, I use this intersection with great trepidation at drop off and pick up time. Furthermore, the stately mature eucalypt near the intersection effectively blocks vision of oncoming traffic. Accidents are common and it is my genuine fear that eventually a child will be severely injured.
3. Again, with reference to changes to [REDACTED], Dominion Circuit has become unsafe and, at peak times,

unmanageable. Street parking in front of the Albany Apartments reduces Dominion Circuit to one safe carriageway. At the same time, traffic flow is increasing as motorists avoid Canberra Avenue. This situation is further complicated by the intersection of Hobart Avenue, Arthur Circle, Tasmania Circle and Dominion Circuit being a recognized black spot. Eight carriageways feed into the intersection which is ineffectively controlled by two meagre stop signs. Accidents and near misses are commonplace. This intersection urgently needs traffic lights.

In summary, progress is inevitable, and we residents have no intention of standing in the way. As one of those residents, I simply ask that the strategy which underpins future development both here in the Inner South and everywhere else in Canberra, incorporates more than just infill and densification. I commend the accepted focus on the 'Garden City' ideal and look forward to that concept being realized here in the Inner South.

[REDACTED]

[REDACTED]

[REDACTED]

Submission on Draft Territory Plan and Draft Technical Specifications

Thank you for this opportunity to provide comment on the Draft Territory Plan and associated documents.

I am an ordinary Canberra citizen, not a developer or a planner. However, unlike most Canberrans I have had some experience trying to negotiate planning legislation as I've had to submit responses to Mr Fluffy block development applications on an adjacent block. This means I've had to study planning instruments in depth to identify non-compliance issues and loopholes.

I feel that as I'm one of the few ordinary Canberrans who might have such experience, I have a responsibility to my fellow Canberrans to study the implications of the new planning provisions and provide a written response.

Having read the drafts I am very worried. I think Canberrans in low to medium density residential areas won't know what's hit them if this goes ahead. Once it sinks in, as more and more people are personally affected, I anticipate strong voter backlash. My conclusion having read the drafts is that the new planning instruments will encourage the building of unsustainable McMansions on a scale significantly beyond what is currently allowed on Mr Fluffy blocks. This goes against the ACT's intent to provide low-cost and sustainable housing. There will also be much less ability for those adversely affected to challenge decisions.

I have tried to offer solutions that provide win-win outcomes for infill in low-medium density areas that I believe would be generally supported by the community.

Comments on: Part A – Administration and Governance

The governance of the Territory's planning was roundly criticised by the vast majority of submissions received by the Standing Committee on Planning, Transport and City Services's "Inquiry into Planning Bill 2022". The Draft Territory Plan will have no credibility unless its governance, as detailed in the Planning Act, is rectified in line with the community expectations (the majority view – not cherry picking outliers) reflected in these submissions.

Comments on: PARTS B & C: THE TERRITORY PLAN

Comments on: B.1 What is the Territory Plan?

"An outcome-based approach to the assessment of development proposals is a distinctive feature of this Territory Plan."

Arguably our planning system is already underpinned by an outcomes-based approach, though they are currently called planning 'objectives' instead of 'outcomes'. The term 'objectives' more correctly describes the direction planning is headed. Outcomes are only relevant after the fact when you are trying to assess the end result.

I fundamentally disagree with the proposed 'outcomes-based approach'. It is good for development planning instruments to articulate desired outcomes (or objectives). However outcomes are not 'planning'. They are the end result of planning. Planning is what happens prior to outcomes. Integral to this are well-designed rules to ensure that desired outcomes are achieved. As one writer to the Canberra Times editor retorted, what would be the outcome if we dispensed with road rules?

If we want to avoid chaos on the roads, if we want to avoid planning anarchy, we need rules to ensure everyone, developers, existing inhabitants, the broader community, all know where they stand, what's allowed and what isn't. Rules mean there is transparency. Without rules, everything becomes arbitrary, open to manipulation, corruption, incompetence. Alternatively they are able to be ignored when bureaucratic financial constraints hamper proper scrutiny of DAs. Lack of rules guarantees ambiguity and a consequential increase in community conflict.

Development rules have been criticised (by developers and pro-development agencies) as being 'onerous' for developers who are forced to adhere to minimum development standards. Having experienced several horrendous rule-breaking DAs on a neighbouring Mr Fluffy block, the planning system is already strongly biased in favour of developers and rules are not remotely onerous. Developers take advantage of every possible loophole (e.g., current planning code 'criteria' allow a lot of latitude and around 'rules' and very few rules are mandatory).

If our neighbouring Mr Fluffy block is anything to go by (and articles by Paul Costigan in City News indicate that ours is a common experience, e.g., <https://citynews.com.au/2022/unbelievable-go-see-planning-failure-for-yourself/>), developers consistently flout rules in their desire to build out the block, horizontally and vertically, with McMansions. Development rules constitute protection to the community and to neighbours. Inadequate as they are, and already biased towards developers, rules are the only protection we neighbours have against unscrupulous developers who want to maximise their profits and who don't have to live with the consequences.

If a DA breaches a development rule it is easy to prove – it's black and white. It either complies or it doesn't. However, you can't prove that something doesn't adhere to an outcome or a design guideline. Neighbours will have no protection if there are only wishy-washy outcomes and flexible design guidelines. If those impacted try to ensure compliance by appealing a DA decision, ACAT is a legal body and can thus only uphold rules / laws. 'Outcomes' and 'guidelines' mean nothing to a

legal body and this will completely disempower the community, who won't be able to hold developers or decisionmakers to account.

If the current planning system lacks the confidence and trust of the community due to bias towards developers, the proposed outcomes-based approach will only make matters worse. If the government wishes to change from a rules-based to an outcomes-based planning development system, this should be taken to the vote at the next election. Unless it does, the government has no mandate. I would never have voted for this.

B.2 Structure of the Territory Plan?

This section includes the statement requiring "subdivisions to make better use of existing underdeveloped land".

I do not object to building additional homes in existing suburbs to minimise Canberra's urban footprint (see also Part C.2.9.a). This is needed if population increases. However, I strongly object to 'overdevelopment' in established suburbs. 18 Darke St Torrens is a recently well-publicised example, and our own neighbouring Mr Fluffy block has been subject to DAs even worse than that one.

Who determines that land is 'underdeveloped'? This is a matter of subjective opinion depending on whether you are a developer or a neighbour or a planning bureaucrat. Those most affected need to have input and the right of appeal. Reading these planning documents, they are so flexible and lacking in 'height, bulk and scale' restrictions that I don't see how neighbours will be able to challenge overdevelopments like 18 Darke St in the future.

Similarly, Canberrans need to agree on a definition of 'low density'. Low density should mean the ratio of structure to greenspace coupled with height limits, not to the number of dwellings on a block. Otherwise there will be unsustainable housing size and loss of urban greenspace in 'low density' established suburbs.

I trust that Canberrans will be allowed to input into other draft Territory Plan documents including Part E: Zone Policies; Part F: 'Other Policies' and Part G Dictionary and annexures and that their advice will be heeded and incorporated in a meaningful way.

Population Policy

Canberra's population is growing and this is the rationale for infill. However, in the long term this is unsustainable, because territory land is finite and resources like freshwater are finite and dwindling due to climate change.

If Canberrans are being asked to accommodate ever increasing numbers of people with all the 'growing pains' associated with that, they need to know the government has a population policy and that there is an end in sight. Where is the population policy that aims to stabilise our population? Where is the population policy that transitions us to an economic model that does not depend on growth but is based on a stable population?

B.3 What are design guides?

"The Housing Design Guide deals with residential components of proposed developments and provides important guidance that supports the amenity and wellbeing of occupants"

The Housing Design Guide needs to provide guidance that not only supports the amenity and wellbeing of occupants but also that of pre-existing neighbours and the wider community. All the planning documents show a conspicuous lack of attention to the rights of existing residents.

B.6 Assessing and deciding development proposals

This section includes nothing about rights of appeal by neighbours and others affected by a DA. It does not mention ACAT's role in the decision-making process.

The public / those adversely affected by a bureaucratic planning decision need to continue to have the right of appeal and ACAT needs to be resourced with specialists able to make determinations based on indeterminate planning 'outcomes' and 'design guides'.

House size and affordability: how to avoid McMansions

The ACT government wishes to ensure that the vast majority of additional residences are located within the existing urban footprint. This is sensible to preserve the natural environment. However, such a policy comes with a number of issues including:

- backlash from irate neighbours and broader community (voters) if not done sensitively (i.e., McMansions allowed in low density areas; privacy impacts; loss of views; decrease of the value of existing residences and solar access).
- loss of gardens (and the suburban wildlife they support),
- heat islands,
- increase in impermeable surfaces covered by buildings, paths, driveways and parking, increased run-off and flood risk

If this policy is pursued it is crucial that it is done with minimal impact on the environment and surrounding, pre-existing inhabitants.

Canberra already has the least sustainable house size in the world. The UK Buildworld study looked at the average new house size in 72 cities across the world. Canberra's were found to be by far the largest at 256.3m² (average Canberra household size is 2.39 people). Cairo houses (average household size is 4.4) came second out of 72 cities at 188m². The Buildworld study was reported in the Canberra Times "Canberra homes the biggest in the world" (22nd February 2023 p.19).

Canberra also has the largest houses in Australia (CT article 19 Feb 2023 p.4).

As Canberra is a city with both housing affordability issues and land availability constraints, this is an indictment on our development planning system. Huge houses take up a huge amount of land, swallow up scarce urban greenspace. They are expensive to buy, maintain and power (exacerbated due to heat island effects). They are NOT sustainable OR affordable. This situation is not in accord with Territory Plan Part C.2.8 (sustainability and resilience principles).

I live in an RZ1 suburban zone. The 2 houses proposed for the adjoining Mr Fluffy block in the most recent DA were 350m² each (decision still pending). An earlier DA was similar. If a 256m² sized house is already the biggest in the world, putting two 350m² sized houses on a 'low density' RZ1 block is absurd. How would such houses contribute to housing affordability?

Not only did the design greedily gobble up the maximum amount of space possible laterally, but also vertically. 'Ground' floors exceeded the (current) maximum allowable height of 1.8m (way higher than the standard fence height of 1.2m). This is even worse than the Paul Costigan article example at Torrens (watch the video on the link to the article: <https://citynews.com.au/2022/planning-failure-in-torrens-the-movie/>). The proposed ground floors on our neighbouring block (both

proposed houses were 2 storey) were way higher neighbouring fences and overlooked neighbouring back yards and encroached on setbacks.

I have studied the draft Technical specifications and they appear to enable even larger McMansions to be built in low-density areas, not smaller houses. A key tool that could be used to minimise house size, plot ratio, no longer appears to be used. Moreover, currently restrictions on the number of storeys are also going to be relaxed which (coupled with lack of plot ratio) will allow a greater number of over-sized dwellings to be built. E.g., currently there are restrictions in a one-behind-the-other block configuration (if against a back fence it can only be one storey). There are no restrictions on the number of storeys that I can see in the current specifications. Moreover, 8.5m is an excessive height for a 2-storey building (the only bulk limitation for RZ1 & RZ2 in the new specifications). 8.5m could easily constitute 3 storeys – the specifications apply no storey limit to RZ1 & RZ2. The maximum height of a 2-storey building should be lower in low density suburbs.

'Low density' should mean a ratio of structure to greenspace and height limitations, not to the number of dwellings on a block. The planting area for large blocks is only required to be 35% of the block, and presumably most of this will be at the front of the block to preserve streetscape rather than the back of the block where neighbouring privacy is an issue. If 2 x 2 storey dwellings of 8.5m high are allowed on low density blocks (the rationale being they can be made more compact and less sprawling), there also need to be overall volume restrictions or they will not be compact or affordable, nor will they encourage the preservation of greenspace in 'low density' suburbs.

Solution: infill should supply the affordable housing market

In another recent Canberra Times article, Mick Gentleman acknowledged problems with large house size and 'planning changes may also be set up to encourage smaller houses' (Canberra Times 19 Feb 2023 p.4). We need something more explicit than this. Where is the detail on how smaller, affordable houses will be encouraged?

I suggest the most beneficial way to encourage smaller houses would be for additional houses built on blocks in established suburbs to be explicitly required to supply the affordable housing market. (If it is a knock down rebuild, it could be either one larger house or two 'affordable housing' units that could be semi-detached and 2 storeys).

The definition of an 'affordable house' could be based on size and should be taken to be no greater than 100m² (this being the traditional size of a 3-bedroom government house – presumably designed for affordability). The advantage of such a policy would be that not only would there be more affordable dwellings available but there would also be much less conflict with existing neighbours. An additional 100m² house is going to cause fewer concerns with neighbours than an additional 350m² house.

Providing there are defined limits on both the size and number of houses built on a single block, compact 2-storey terrace houses in line with the existing streetscape would save on building costs and ensure more backyard than single storey freestanding houses do. I would not find this offensive in an RZ1 zone. I find it less offensive than 2 sprawling detached houses on the same block.

If there is sufficient street frontage (e.g. a corner block or a block with a long street frontage along one street only*), and providing proposed terraces are in line with existing houses (i.e., same setback), it is conceivable that more than two 100m² terraces could be built on the one block in an RZ1 or RZ2 zone without unduly impacting neighbours. In such a case, discussion with neighbours should be obligatory so that any potential concerns with increased traffic, privacy, vegetation

removal and the like can be identified and addressed as far as possible in the DA. This would minimise conflict.

* – this provision should not apply to battleaxe blocks as this encourages the construction of unsafe driveways. See ‘safety concerns’ below.

District strategies state:

“Affordable housing – Continue to dedicate at least 15% of new residential land releases each year to affordable, community and public housing, and investigate planning and design provisions that encourage the supply of affordable housing.”

There are also win-win outcomes to be had if second residences in established areas are geared at supplying the affordable housing market. Affordable needs to be defined. The definition should include size limits (e.g., maximum size 100m², the size of a standard 3 bedroom house).

Technical specifications need to minimise infill height

There need to be stringent limits on how high above natural ground level the ground floor of buildings are allowed to be to avoid the issues made public by journalist Paul Costigan and his associates (<https://citynews.com.au/2022/planning-failure-in-torrens-the-movie/>). This has been an issue for all the DAs put forward for the Mr Fluffy block next to us. A ‘ground floor’ – currently allowed to be 1.8m above natural ground level is way too high and intrusive for neighbours (especially in a one-behind-the-other configuration).

On a flat block, guidelines should specify that 0.5m above natural ground level is sufficient and that anything higher needs special justification, agreement from neighbours and special approval.

On a steep block, excavation or split level should be the norm to prevent developments looming over neighbours’ fences. I note that the technical specifications aim to minimise cut and fill (specifications 40-42) and believe there is enough flexibility to enable constructions on a slope to be reduced in height for neighbours rather than having constructions that sit high above the ground on a plinth.

8.5m is excessively high for a structure set back just 3m from the back fence of neighbouring properties and their private open space in ‘low density’ suburbs. As overhead powerlines are located along back fences, especially in established suburbs, it is hard to achieve adequate screening. The setback needs to be further away from back fences to encourage larger back yards and privacy for neighbours.

Setbacks should not be reduced in established suburbs

I think it is important to retain existing setbacks so houses don’t look out of place and to give maximum encouragement for back gardens. Developers have demonstrated that they will build blocks out to the maximum, so any latitude given on setbacks will result in buildings that loom over existing residents’ fences, regardless of whether or not such large buildings are desirable.

In a few cases, there could be room for latitude, but only if there is explicit prior written agreement from neighbours. I anticipate that neighbours, for example, might be willing to compromise on side setbacks to accommodate 2 side-by-side residences if the alternative is a one-behind-the-other option that would impact more on their privacy.

Design Guides, Technical Specifications, Driveways and Safety concerns

Additional street frontage should not be allowed in the case of battleaxe blocks as this encourages the construction of unsafe driveways. This was the case for our neighbouring Mr Fluffy block.

A new driveway was built on the opposite end of the block from the official driveway for the express purpose of circumventing “Special Provisions for Mr Fluffy blocks”. This happened without consultation and it had our whole neighbourhood up in arms. The block is a battleaxe block for safety reasons as cars come whizzing along a busy major road over a crest and round a blind corner. It is a hazard not only to future residents, but to other road users, visitors to the block, service providers, delivery vans and construction workers. Residents of homes further down the slope who have legal driveways (and are not battleaxe blocks), have reported being hit from behind while turning into their driveways or having near misses. Serious accidents have also occurred on this stretch of road.

The Planning Authority agreed this was an unsafe driveway and that it should not be used for vehicular access to the block (although it is yet to order the curb be restored).

Battleaxe blocks are battleaxes for a reason and if street frontage is subsequently proposed for both ends of the block, rigorous safety studies are needed. Technical specifications relating to driveways should require that where safety is a potential issue, safety studies are NOT organised by a proponent but are arranged independently by TCCS and billed to the owner. Otherwise there is a conflict of interest, as appears to have been the case for our neighbouring block.

The draft technical specifications (section 1.5) need to be amended to explicitly mention safety as a requirement for verge crossings. Then the community will be able to alert authorities if there are any safety issues they may not have been previously aware of.



Above: unsafe additional driveway built onto a major suburban access road to circumvent Special Provisions for Mr Fluffy blocks.

Restrictions when building one house behind another on a subdivided block

Where one house is built behind the other on an established block (instead of side by side), there is greater impact on neighbours. The additional house, especially if double storey, inevitably overlooks neighbouring private open space. This configuration should be actively discouraged, especially in a 'low density' RZ1 & RZ2 zones. Subdivision should be side by side wherever possible.

Side by side configuration can be encouraged by:

- allowing it to be semi-detached – shared wall
- allowing both dwellings to be 2 storeys if semi-detached
- allowing one dwelling to be on the ground floor and the second on the upper floor.

One behind the other configuration should be actively discouraged:

- the rear dwelling should only be allowed to be single storey and not elevated above 0.5m
- the rear dwelling should be set at a 45 degree angle so as not to have direct line of sight into neighbours' windows.
- There should be screening requirements
- Maximum floor area of 100m² to supply the affordable housing market.

Continue to use plot ratios as they can contribute to compact development;

No exemptions for balconies, 'al fresco', porches, terraces, which increase McMansion size

Plot ratios are a key tool for 'height, bulk and scale' management. There are no plot ratios mentioned in technical specifications. Dispensing with this provision will inevitably enable bigger McMansions to be built in low density suburbs.

Currently building height (8.5m), planting area ratio (35% of the block) and setbacks appear to be the only restrictions that remain in the new planning technical specifications and this is insufficient to prevent McMansions. The current plot ratio for dual occupancy of RZ2 blocks and surrendered blocks in RZ1 is 35% - i.e., gross floor area, including upper and lower storeys, can be no greater than 35% of the total area of a block (unless it is a corner block, where 50% is permitted). So the new requirement appears to allow a substantially greater proportion of a block to be developed than before. (see Multi Housing Unit Development Code Rule 3.3).

Developers currently regularly exploit a planning loophole in the ACT that exempts balconies, terraces etc from being included in gross floor area calculations for the purpose of determining plot ratios, even if they are covered by the structure's roof and are incorporated into the structure's wall and foundations. This significantly contributes to McMansion sized houses exceeding plot ratios (even though they conform on paper). In the case of our neighbouring Mr Fluffy block, exempt roof-covered structures totalled over 100m², the size of a standard 3-bedroom house.

These non-greenspace areas are even allowed to be included into a DA's 'open space' calculations. For sustainability reasons, open space should be confined to greenspace except in the case of high rise buildings where there are no other private open space options.

These exemptions put the ACT out of step with international standards. The Australian Property Institute's "Technical Information Paper - Methods Of Measurement" uses IPMS: International Property Measurement Standards. The residential standards are found (pp33-39) at:

https://www.api.org.au/wp-content/uploads/2021/04/arptip_3_methods_of_measurement_01042020.pdf

API explains that it is standard practice to include balconies, verandahs and rooftop terraces in measurements. The exterior wall includes the exterior face of a balcony. Only ground floor patios and decks that are not part of the building structure may be excluded. It is a finesse to include a structure in floor measurements but exclude it from plot ratio calculations.

If we don't want McMansions by stealth, the ACT needs to continue to use plot ratios as this tool can help to ensure compact development. These should conform to accepted measurement standards and structures like balconies must be included in plot ratio calculations.

Special Provisions for Mr Fluffy Blocks (under the current Territory Plan) should continue

No mention is made in the Draft about the continuing legacy of Mr Fluffy blocks and how continuing issues on still-vacant blocks will be addressed.

Neighbours of Mr Fluffy blocks have experienced years of disruption and there has been considerable stress associated with constantly having to be alert to illegal developer activities on the neighbouring block, like constructing additional driveways; lopping protected vegetation; and having to battle non-compliant DA applications. I sincerely hope the situation we have had to endure for years will not soon become a Canberra epidemic. Having experienced these problems I am amazed that the government thinks Mr Fluffy provisions in established suburbs should be the model for future infill.

The Territory Plan 'Special Provisions for Mr Fluffy Blocks' should not be further loosened, eg, in terms of number of storeys allowed when one house is built behind another, due to planning legislation changes. Otherwise all our efforts over the years in ensuring developers adhere to the special provisions will be wasted. Some surrendered blocks are yet to be re-developed due to DAs having been submitted like the one at 18 Darke St, Torrens. Neighbours shouldn't be penalised for having successfully skuttled similar DAs only for the rules to change and for this now to become acceptable and unchallengeable.

New medium density suburbs like Crace are well-designed from the outset to accommodate more people. However, going by the outcomes of Mr Fluffy special provisions, retrofitting existing suburbs can be disastrous.

Sensitive infill in existing suburbs could easily be achieved without objections from neighbours, if building size is curbed. The current McMansions model that maximises the built form on the block both horizontally and vertically, guarantees failure. This outcome will destroy urban greenspace, suburban wildlife, create heat islands and will cause enormous and disruptive conflict with neighbours, including associated stress and mental health issues as it is their homes, their place of refuge, that is affected.

The value of the neighbour residences may be impacted by the construction of an oversized building. Hence developers should be held responsible for any decrease in value and provide compensation to those affected.

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Comments on: Part A – Administration and Governance (maps): Map 3: Belconnen:



Figure 1: Map of Lawson Grasslands per National Capital planning code (note that Precincts A and B are identified as suitable for residential uses. Precinct C has been identified as a conservation zone for Kangaroos. Precinct D has been identified for heritage (natural, historic, cultural and technical) and nature conservation only. Precinct E has been identified primarily for nature conservation.)

Above left: Draft Territory Plan with Lawson native grasslands identified as RZ1 (according to the map's colour coded key); **Above right:** Current conservation zones of Lawson Grasslands

Lawson Grasslands: The draft territory plan map of Belconnen (above left) codes Lawson Grasslands as RZ1: suburban. This is one of the largest remaining tracts of critically endangered native temperate grassland habitat remaining in the ACT. The Map on the right (copied from the ACT Conservation Council's website) indicates the same threatened native grassland and its protection status as per the National Capital planning code. The grassland and heritage have been given protection status and this habitat type is so endangered it should continue to be protected and given PRZ status. Native grasslands are more, not less, endangered now than when this protection was given. I note the importance of protecting the grassland is acknowledged in the Belconnen District Plan.

Green Waste: A second suggestion relating to the Belconnen Map is for the existing Canberra Sand and Gravel (green waste facility) to remain where it is, regardless of what developer contracts have prematurely been signed. This area is currently shown in green as 'hills, ridges, buffer'. Adjacent to it is the FUA Macnamara. The map is insufficiently clear as to whether the Green area (currently occupied by the greenwaste facility; the former tip -contaminated land; and Parkwood) is also intended to be FUA. Canberrans need unambiguous maps if they are to comment on them.

The Green waste facility is an established business in a suitable location and there is no reason why it should be moved, particularly as no suitable alternative site yet been found. There should have been community consultation before this decision was made, then there would have been no 'whoops' afterwards when it proved hugely unpopular. Likewise, I hope the current horse-riding facilities and dog training facilities are not forced to move or close to make way for developers. If there is to be dense residential housing in the area, new inhabitants will need the greenspace and outdoor facilities.

Comments on: Map 5: Molonglo Valley:

The Molonglo Valley map shows a large proportion of Blewett's Patch (aka Blewitt's Block or Piney Ridge) as 'FUA' – Future Urban Area. This is high value, biodiverse remnant habitat. It is a breeding

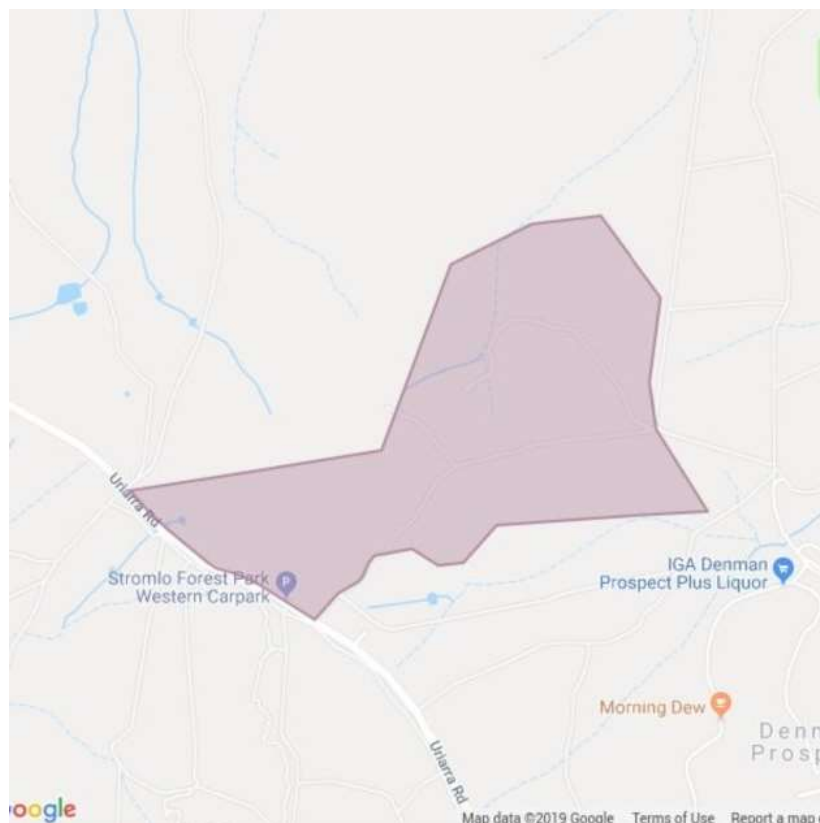
ground for many creatures, has excellent understorey including a variety of heaths and native orchids. It is in excellent condition and has few weeds. If this densely forested area is cleared for houses, it will make the ACT Government's tree planting program a farcical exercise: "In 2021-22 we planted approximately 18,000 trees on unleased land" Etc. (<https://yoursayconversations.act.gov.au/trees-act/tree-planting-across-cbr>).

See also "TCCS Urban Tree Planting Program" facts sheet at:

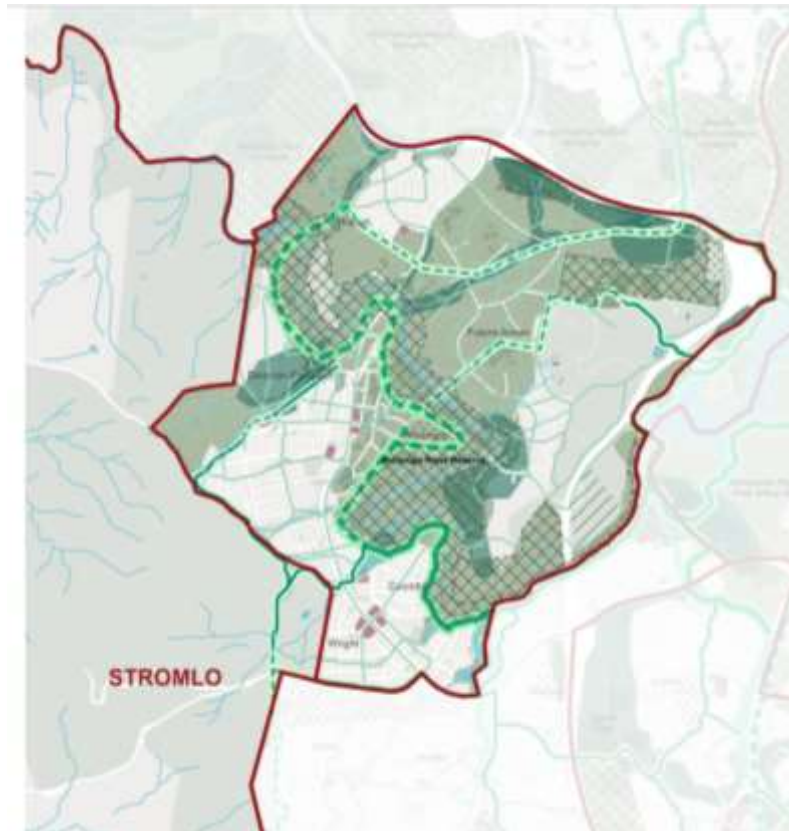
(https://www.cityservices.act.gov.au/data/assets/pdf_file/0009/1746801/210422-TCCS-TREES-FAQ-WEB.pdf)

I challenge the ACT Government to count the number of trees in Blewett's Patch and 'promote' the number of trees in high value habitat it has already / proposes to cut down for fire buffers in the same manner that it promotes the number of street trees etc it plants. Exotic (or even native) urban plantings cannot begin to compare in habitat value to a complex, biodiverse remnant woodland with soil flora & fauna intact.

The ACT Greens promised Blewett's Patch would be preserved as an election promise. This needs to be clearly reflected on the Molonglo Valley map of the Territory Plan.



Above: 'Blewitt's Block', also known as Piney Ridge.



Comparing the The Molonglo District Strategy (above) with the satellite photo of the same area in the previous photos, it would appear that the ‘future urban area’ (indicated in Territory Plan Map 5) includes substantial amounts of forested area. This may simply be due to an error in designating it FUA? Clarification is needed.

Comments on: Draft Territory Plan Part D2 Belconnen District Policy

Section 1.3 Policy Outcome: Landscape currently reads:

“Landscape: A strong part of Belconnen’s character is the landscape setting. The prominence and environmental qualities of the inner hills including Mt Painter, The Pinnacle, The Gossan and Mt Rodgers is to be retained and enhanced”

A key component of the Belconnen District’s landscape is its waterways and floodplains and they also merit a mention as something to be ‘retained and enhanced’. While some individual wetlands are subsequently included in the more specific policy outcomes, they have a broader value than those acknowledged by the outcomes. In particular, there is an emerging trend in the ACT towards developing flood prone land. This reduces the ability of the landscape to safely accommodate floodwaters and puts valuable assets in the path of floods.

Managing landscapes for flood mitigation and climate change adaptation¹:

Wetlands, waterways and their surrounding floodplains are valuable for flood management. Due to climate change, historic flood frequency values are no longer relevant (according to flood modelling, a 20th century 1 in 100 year flood in the Murray Darling Basin may occur, on average, once every 10

¹ See “Flood management in a changing climate”, 2016 by C. Wenger, available at: <https://openresearch-repository.anu.edu.au/handle/1885/117237>

years by the end of the 21st century). Climate change not only causes water scarcity due to droughts but it also results in more intense flash flood events as hot air can hold more water. Careful management of the landscape can mitigate both of these problems.

In many countries 'living with floods' policies require development in flood prone areas to be 'flood-compatible', and that means low-lying land around waterways is reserved for low-value infrastructure, or infrastructure that is designed survive flooding that does not result in expensive damage bills. Flood compatible uses include wildlife reserves; eco-system services like water security, water quality and flood accommodation; and tourist attractions and recreation facilities like bike paths, picnic benches, camp grounds and sports fields. Some of these uses are included in 'landscape outcomes', but floodwater accommodation and water security are not.

To accommodate floodwaters we need to preserve our floodplains. Development that encroaches on flood plains clogs them up, resulting in less room for flood water to safely spread. Traditional structural mitigation measures such as levees only make this problem worse and over time they actually increase flood risks ('the levee paradox'). Development of floodplains results in floodwaters being squeezed through narrower passages causing flood water rise higher and faster. Water velocity is a key factor in flood damages, not just flood height.

Landscapes can be designed to retain floodwaters. This will both slow down the floodwater and reduce flood peaks.

Retaining floodplains for flood mitigation enables water enough time to soak into the soil and replenish groundwater. This is an important climate change adaptation measure that marks a departure from the mindset 'channel it away as quickly as possible'. Freshwater is a scarce and valuable asset to a dry continent and it is of no use in the sea. The ACT with its growing population should not waste this resource. When we have years of plentiful rainfall we should ensure the territory's lands are properly hydrated instead of immediately drained and that groundwater is replenished instead of shunting it off downstream as quickly as possible. To do this we need to preserve our floodable lands and retrofit existing concreted and piped waterways.

As Canberra 'grows up' and becomes more densely urbanised it should be careful not to lose the legacy it inherited of being so well-designed that it is the only state/territory in Australia to escape largely unharmed by flood damage. Unfortunately, there is a recent trend in the ACT to view flood prone land as open for development. A recent example is the planned development of Kippax playing fields (see document Part D2 'group centre expansion' Figures 6 & 7). This site is a floodplain and includes a former creek bed (a tributary into Ginninderra Creek, currently diverted to the edge of the oval and piped underground). Expensive residential and commercial buildings will be built on this site that will be vulnerable to flooding. The risk will be borne not by the decisionmakers – the ACT Government – or by developers, but will be shifted to the new shop owners and residents. If insurers are aware the site is a former creek bed and floodplain, the new development may be uninsurable or the premiums unaffordable. This development will compromise the ability of the landscape to absorb and store floodwaters. Increased runoff and velocity will increase erosion in Ginninderra Creek which in turn will degrade water quality.

As far as I'm aware, no plan has yet been released by ACT Government on how the flood risks of the new Kippax development will be managed, though I understand the matter was referred to ACT Healthy Waterways.

Another recent example is the Umbagog bridges (Bridges 1194 & 1195), where replacement bridges have been designed so that the channel leading to the swamp will be clogged up with concrete

footings – many more than the existing bridges (bridge design specifications publicly available in the DA documentation). These will clog up the floodway leading to the swamps that water is meant to drain into. While reeds bend and allow water to flow through, concrete does not. Bridge designs in floodways need to be fit for purpose and must not impede floodwaters.

The ACT needs to purposefully preserve its floodable landscapes as a land use in its own right. Please could this be acknowledged in landscape outcomes.

Other values of Belconnen District's water ways and wetlands that need to be retained and enhanced include:

a) For wildlife:

The Ginninderra Creek catchment services the largest percentage of the ACT's population and is of vital importance for the ACT's wildlife. Ginninderra Creek serves wildlife as an environmental refuge in the midst of an urbanised environment and acts as a ready-made wildlife corridor between areas of high habitat value. It links high value Mulligans Flat to Ginninderra Falls and vegetation remnants in between such as at Umbagog District Park. With careful planning, altitudinal corridors can link hill reserves to riparian corridors and wetlands. For example, wildlife corridors can be maintained and enhanced with appropriate plant species between hills such as Goodwin Hill, Mt Rogers, Gossan Hill to Ginninderra Creek, and other wetlands, lakes and ponds.

b) For community health & wellbeing:

Maintaining the health of the riparian environment in the Belconnen District is not only of importance to wildlife but has extremely important value to community health and wellbeing. Land alongside waterways is a valuable community resource used for exercise, for wildlife observation and photography, for group community activities, as tourism attractions and for mental health and spiritual rejuvenation.

c) For heritage:

Canberra's waterways, including Ginninderra Creek, continue to be of great cultural importance to first nation peoples as pathways through the landscape and cultural heritage sites are found along them, for example, axe grooves at Umbagog District Park. Tyrone Bell noted in one of his talks that water was so important that local Aboriginal people used the indigenous word for 'water' to translate the European settler concept 'money'; an indigenous group that had well-watered lands was considered wealthy.

d) For water quality:

Maintaining land for such purposes is also important for water quality as the provision of adequate buffer zones that are well vegetated waterways filter impurities. This is a well-recognised eco-service that reduces the costs of providing potable water. Climate change poses a threat for water quality. The recent 2019-2020 bushfires resulted in hypoxic water events, degraded water quality and widespread fish kills. Denser urban landscapes inevitably reduce water infiltration, increased runoff, increased erosion of water courses and turbidity.

Thank you for your consideration.

 Macgregor

Proposed New Territory Plan and Draft District Strategies

I oppose the proposed new Planning Framework on account of the poorly framed planning outcomes. Without clear parameters developers will be able to propose plans that 'look good' but lack due consideration of major issues such as impact on the community, climate, public infrastructure, (schools, shops, health facilities etc.) which should be included as a developer responsibility for funding to meet requirements of those facilities. The following amendments should be made:

- Longer periods for review are necessary.
- Good consultation is necessary, however what is the definition of 'good consultation'.
- A consistent approach to community needs based standards and quality development should be ensured.
- What is the definition of substantial benefit? The reasons by which a decision is made need to be made public and be subject to review.
- Strong compliance and enforcement strategies are required to ensure that developers are held to account for projections such as traffic movements, requirement for facilities etc.; and, if outcomes are detrimental to those stated in their submissions significant penalties should apply that allow rectification of the adversity caused.
- Plans must be required to account for climate change effects, biodiversity and ecological sustainability. This issue is critical, yet the proposed South District Strategy Plan allows for significant increase in building density with its associated detriment to the environment.

As well, the proposed New Planning Framework should NOT be agreed.

1. The retention of the existing character of Yarralumla and Deakin must be retained and proposals should state how this is being addressed.
2. Yarralumla is already subject to two large developments at the Canberra Brickworks and the CSRIO Forestry sites. The new planning framework, in particular the Inner South District Strategy and Territory Plan Zoning should not permit any further increase in building density of Yarralumla until the impact on the community of those two developments has been assessed. Otherwise, there is the potential for over development and with it significant changes the character and sustainability of the suburb. Increased density already scheduled is doubling the number of dwellings, but there is no concomitant increase of infrastructure to support a much larger population. Further increases in density is likely to break systems.
3. District Strategies should be subject to change based on community input and the Minister required to include the community amendments.
4. Components of the planning framework that are used for assessment should be statutory, in particular the Technical Specifications – otherwise developers could present glossy brochures but not be held to account in delivering for the community.
5. The New Planning Framework clearly provides for development, but the achievement of other outcomes is unlikely owing to its lack of clarity, complexity and mix of statutory and non-statutory components, and lack of hierarchy. It is likely to be costly and inefficient in achieving high quality development that meets the needs and wishes of the communities.
6. The Inner South District Strategy should be revised to ensure that loss of tree canopy cover through urban infill, and the creation of urban heat islands, does not occur in Yarralumla. Yarralumla's tree canopy cover of 30% must be protected and retained. This should be done

by to removing the high density urban infill that has been proposed for Yarralumla, and similarly for Deakin.

7. The rationale underpinning increased density, concentrating development along transport corridors, and 70% of new housing being in existing urban areas to reduce the carbon footprint, should be reassessed in light of the fundamental changes in the work and transport paradigm. The existing planning framework should remain in place until this has been undertaken.
8. The views of the residents of Yarralumla have not been genuinely considered, in particular that the existing character of the suburb be retained. Community feedback from the 2021 district planning consultation for the Inner South has been ignored (Draft Inner South District Strategy Page 91) and these issues remain.
9. Canberra's design is original in that it has open space around its several lakes and centres and transport corridors between them so that wherever someone lives they have access to services and recreational opportunities. To put the pressure of increased density on the inner city suburbs is likely to reduce the quality of life for all and to set up inequalities between those who are fortunate enough to live in the inner suburbs and those who do not. Higher rates may well force current residents out of a suburb where they have spent a large proportion of their lives. Already we have experienced rate rises associated with the fact that someone has cleared a block the same size as ours and built a house which sold for \$3,600,000. We didn't ask for and didn't want that sort of housing in our neighbourhood, but get our rates put up on account of another person's priorities.

[REDACTED]

[REDACTED]

[REDACTED]

Re: Draft Belconnen District Planning Strategy

[REDACTED]
[REDACTED]

I am very pleased that the District Strategy for Belconnen will “protect the things the community values most”. This has not occurred in long-established Belconnen suburbs where re-development has already negatively impacted residential amenity.

What I value most about Belconnen is the high residential amenity of long-established suburbs which were well-designed to meet a variety of needs.

The majority of blocks in older suburbs were designated for single dwellings (providing green space maintained by lessees, and privacy). Each suburb from the outset had areas designated for medium-density housing, and other areas designated to meet community needs for open space (oval), playgrounds, schools and a commercial zone for shops and petrol stations. Subdivision of land was designed for low-density and the majority of homes remain single-storey which is ideal for all age groups (and those with impaired mobility). That planning policy worked very well up until around 2000 (when densification was first proposed under A10 zoning – without any consultation with those affected in Belconnen). Many lessees at that time had lived in their home for 30+ years contributing to their local communities. Nowadays it is not unusual for Belconnen residents to have lived in their homes for 50+ years. I have lived in my home for 43 years and want to continue to live there until ill health (or death) no longer permits me to do so. I find the constant threat of densification around me extremely stressful and I am not alone. Please note the use of the word ‘home’ as it is much more than just bricks and mortar. We have a large family in Canberra and want to age in place with our established environment protected. My home is well maintained and, when I have to leave it, I am confident many families would be keen to buy a home with a mature garden surrounded by similar properties.

Not only for current residents, but for future generations who want their own garden space, **established suburbs require protection** so that the option to have a decent-sized garden (more than a courtyard) is a realistic goal. The gardens of the Garden City are in danger of being lost forever as developers seek to destroy the residential amenity of established suburbs (aided by planning policy).

For Belconnen District I support:

- Preserving Lake Ginninderra foreshore for public access
- Protecting urban waterways
- Well-maintained suburban roads and pedestrian pathways
- More community facilities where required
- Paediatric services at Calvary Hospital
- Retention of private gardens to offset climate change, heat island effect and promote good mental health

I am unsure of the level of demand, but it is possible that it is time to consider a public pre-school and primary school in the Belconnen Town Centre as apartment towers now have families living in them. The Town Centre is currently included in the priority enrolment areas of Florey and Macquarie Primary Schools (which are not local to the Town Centre and not within walking/cycling distance of where children live). The difficulty would be finding a suitable site – perhaps the area of land between Ginninderra College and John Knight Park (previously used for UC accommodation) if it is not already leased. The development of UC will increase the demand for schools in the Town Centre area.

The role and function of group and local centres is a complex matter. It appears from the map provided with the Belconnen District Strategy that virtually all suburban shopping centres will be subject to review.

Over the last 20-years-or so, the role of local shops has changed enormously. Very few local shops have actually retained the types of businesses that occupied them originally. This is likely due to the change in shopping habits (including on-line ordering, closure of local schools, inability to compete with large supermarkets, and more women in the workforce). Some local shops in Belconnen include a grocery store, but there others that do not. In my view, this is not a concern as there are other options for purchasing grocery items at group centres and the Town Centre.

For example, Weetangera local shops now comprise the following businesses:

- Gym
- Professional rooms - exercise physiologist and dentist
- Beautician
- Wholesale bakery
- Cleaning Business
- Restaurant

Businesses at Weetangera shops no longer serve just the local residents but must have a wider customer base. The traditional grocery store, hairdresser and newsagent are long gone and the petrol station site is now two blocks of flats. However, I do not think this is problematic as there is easy access to Belconnen Mall, Jamison Centre, Kippax and Hawker Village shops (all accessible by bus, car or bicycle).

Most local shops and group centres will have several part-owners. A major re-design of any shopping centre requires the support of each of those owners and would also require the businesses to relocate temporarily (and they might not return). I am not sure how planning policy could (or should) address this new character of local shops that is common today.

Local shopping centres in Belconnen suburbs are getting old and many do need a facelift. The raised pavers at Hawker shops are very unsafe, several car park trees have died and not been replaced, the recycling container is an eyesore in the present location and a re-paint of the toilet facilities and shop facades would not go amiss. Is it possible that government responsibility for maintaining shopping centres could include funding the re-

painting/upgrade of shopfronts? It appears that building owners are either unwilling or unable to expend dollars to improve the appearance of their premises.

When there was consultation for a Master Plan for the Hawker Village shopping centre several years ago there was vehement opposition to any plans to reduce ground level parking spaces and that would likely be the case at any shopping centre today. Planners need to get real on the need for parking – the vast majority of people use their cars when shopping even locally. Densification anywhere would require more, not less, parking spaces at shopping centres. Parking proposals put forward by the Planning Authority in the case of Hawker were not acceptable to the community because they stripped the centre of **the attribute people valued most** i.e. easy access parking at ground level which could accommodate everyone at all times – shoppers and trade vehicles (some quite large or with trailers that require extra parking space) that bring business to the shops.

Another issue for local shopping centres is ensuring that buildings are used, and if not they must be properly maintained. For many years the TAB at Hawker has been empty (save for a couple of months when there was an antiques & collectibles store renting the space, but it moved on very quickly). The owners did nothing, despite representations to government from local residents, to deal with the eyesore it became. Government needs to take swift action where shop premises (or residential blocks) become an eyesore.

Any re-development proposal for the Belconnen Town Centre is of concern to me as I visit usually about 3 times per week. I support the current lay-out which keeps the services (car yards etc) area separated from the retail and residential areas (but would prefer the separation was parkland along Lathlain Street opposite the Mall and not high rise development).

I attended an information session on the topic of re-development of the Westfield Belconnen Mall where none of the presenters explained how the grand visions could possibly be implemented without closing large sections of the Mall. Concerns were raised about parking availability for visitors to the Town Centre while a rebuild to achieve high rise development on the Mall site could occur. Any reduction in the availability of parking in the Belconnen Town Centre will discourage people from going there.

Please consider reserving a site for a large Park 'N Ride car park that would provide bus and (in future tram) connections into Civic in the future.

We are writing in relation to the above.

My husband and I senior citizens and have lived in South Canberra for many years.

We bought into the area not only for the proximity to the shops and the bus stop, which is close by, but to enjoy the large trees, gardens and open spaces throughout the suburb.

Had we been aware that the government was considering re-zoning we wouldn't have bought our townhouse and spent so much on updating and renovating.

We have had not only solar panels and a battery installed but double glazing to windows and doors. We have spent a considerable amount of money renovations.

It is horrifying and distressing to think that we could lose money should we have to sell and move. We are not wealthy and having to move would result in so much stress and worry.

Due to ongoing health issues, we have also gone to the extreme expense of having a lift installed to allow us to continue living in our home.

We would appreciate your feedback and response to our submission.

[REDACTED]

[REDACTED]

Forrest. ACT 2603

Feedback on Draft Woden District Strategy

1st March 2023

1. Potential edge street linking Holman St. (near the Holman St. oval) to Service St. and Service St. to Theodore St.
 - a. Any reduction of green space to add additional road space flies in the face of the enhancing of the city wide blue-green network;
 - i. Reduces the available recreation space currently used by local Curtin residents and residents of the Irving St. apartments.
 - b. Would require the removal of a couple of dozen mature trees,
 - i. Impacting the local natural environment, including native birds and reptiles.
 - ii. Reducing the green canopy; adding to the daily ambient temperature which leads to greater energy usage to cool homes during seasonal hot weather.
 - c. Impact access to the existing flood memorial;
 - d. Turns the Service and Dry St. loop into a much busier street with new through traffic to and from Holman St.
 - i. Increases the danger to young children using the street from passing vehicles using the road;
 - ii. Greater motor vehicle noise pollution and exhaust emissions.
 - e. Curtin already has significant trunk roads through the suburb (Theodore, Carruthers and McCulloch Streets) with hundreds of vehicles every day passing through so adding to the traffic load would be a big negative.
2. A potential new edge street (linking Holman St. (near the Holman St. oval) to Service St. and Service St. to Theodore St.) to clarify the urban edge to the new boulevard and 'unlock' sites for development;
 - a. The densification of this area of the suburb would change the character and appeal of living in Curtin for ever.
 - i. Leading to a reduction in the quality of daily life;
 - ii. Negatively impact existing property values.
3. The addition of community and retail space in the area of the existing Melrose Dr./Yamba Dr./Yarra Glen roundabout:
 - a. Would mean a further reduction of green space:
 - i. Negatively impacts the ACT government enhancing of the city wide blue-green network;
 - ii. Increases the reflected noise pollution from the hard surfaces on buildings;
 - iii. Adding to the ambient temperature which leads to greater energy usage to cool homes during seasonal hot weather.
 - b. The addition of further buildings increases the visual pollution that local Curtin and Hughes residents are subjected to.
 - c. Why would you add additional commercial space when there is already plenty of vacant commercial space in the nearby Woden Plaza and surrounds?

Draft Woden District Strategy

Objection to the proposed Curtin Edge street

I am writing to strongly oppose the proposed 'new edge street to clarify the urban edge to Yarra Glen' (aka Curtin Edge).

The current green space that surrounds Curtin is well utilised by our community, especially for exercise (walking, jogging, cycling and horseriding). Additionally, it provides a safe, road-free bike lane for cyclists and pedestrians, including for children who ride their bikes to local schools and shops. These green spaces are utilised by the Curtin community for many forms of recreation, including picnics, and playing outdoor games with family and friends and are essential for our mental health and well-being.

The green space surrounding Curtin, including the Curtin Edge contains mature trees that provide essential shade, and are also a necessary habitat for many birds and wildlife. It would take decades for newly planted trees to provide the same level of solar protection and habitat.

The proposed area is also considered a potential flood zone due to its proximity to Yarralumla Creek and it would be negligent of the government to allow the construction of a street so close to the lower side of the creek.

I do not oppose additional pedestrian/bicycle bridges over Yarralumla Creek and lanes being constructed to allow for easy and safe access to the light rail on Yarra Glen or to the new development site (former North Curtin Horse Paddocks). However, these new bridges must seamlessly connect with existing bike/pedestrian lanes, without the need for any destruction of existing mature trees and with careful consultation with residents.


Curtin ACT 2605

ACT PLANNING REVIEW AND REFORM PROJECT: OBJECTIONS/CONCERNS

We have major concerns about and objections to, what the Government is proposing in relation to the new Planning Act, the Territory Plan and the District Plan for the Inner South where we reside. Our principal concerns are:

1. GOVERNMENT'S FAILURE TO EXPLAIN WHAT IS WRONG WITH THE CURRENT SYSTEM AND WHY IT BELIEVES FEWER RULES WILL DELIVER BETTER OUTCOMES

The information provided on the website is difficult to navigate. Nowhere have we been able to find a meaningful explanation of what is basically wrong with the present system and a clear rationale for what is described as an outcomes-based system. The implication is that flexibility is more important than certainty. We cannot agree with this. Most of us are looking for greater certainty in outcomes. The investment that we make both financially and emotionally in our residences is for many of us a very large one. It affects most aspects of our lives.

We need to have some degree of certainty about the surrounding environment, especially neighbouring structures and uses. For most people it is devastating to find that developments have been allowed to invade or destroy their privacy and/or lose reasonable solar access or other significant loss of amenity.

What is required is a clear statement of expected outcomes, rules and/or guidelines as to what can be expected to deliver those outcomes, and adequate oversight to ensure compliance.

In general, this should be able to be achieved through the current approach although it is clear firstly, that some of the existing requirements need some amendment to ensure that desired outcomes are achieved and secondly, that compliance oversight needs to be improved.

In the documentation there seems to be a suggestion that there is an inherent conflict between rules or requirements and improvement in design quality. This is quite frankly complete nonsense. An "anything goes" approach is far more likely to stand in the way of an improvement in quality.

What is required is a clear statement of expected outcomes that is supported by a set of sensibly developed rules, guidelines and performance measures that ensure those outcomes are achieved.

This would not preclude an approach that allowed innovative developments providing that it could be clearly demonstrated that quality outcomes could be achieved that did not impact negatively on neighbouring properties.

2. THE PROPOSED REDUCTION IN THE REQUIREMENTS THAT DEVELOPMENTS ARE EXPECTED TO MEET; IN PARTICULAR:

(a) Changes in plot ratio provisions and the substitution of a site coverage ratio as a mandatory requirement

The Government is proposing to drop the mandatory 50% plot ratio requirement, on the grounds that it is too complicated, and substitute a site coverage requirement as a better means of managing building scale. But the reason that the plot ratio provision has been ineffective in limiting the size of developments is not that it is “complicated” but that in the past many parts of buildings (especially garages and only partially enclosed rooms) have deliberately been exempt from the calculation. Also, the requirement has not been monitored adequately. Everyone is now familiar with building footprints in RZ1 areas that appear to cover well in excess of 70% of the block area and where the plot ratio for a two-storey development would seem to be approaching 100% or more.

It may be that site coverage, as long as it is accompanied by other mandatory requirements such as building height and setback requirements, is a better measure - but why is it proposed to be increased? And by how much?

It is essential that all parts of the building(s) on the site be included. We need much more information on this – what is the site coverage limitation now and what exactly is proposed for the future?

Also, ACTPLA’s documentation suggests that a 50% plot ratio will still be a guide - but will it now include garages and all roofed areas? If not, why? And, what is the justification for different plot ratios applying for multiunit as opposed to single unit developments in the same residential zone? Again, more information is required.

(b) The abandonment of private open space protection

The requirements protecting the principal private open space of dwellings in residential areas have been an important part of the current Territory Plan up until now. The proposal that these will no longer be mandated is extremely disturbing. It is essential that this be reconsidered. The possibility that residential developments could be approved because of a subjective judgement that overall, they represent a quality design incorporating innovative approaches, notwithstanding the negative impacts on neighbouring properties, is alarming. Residents should be able to be certain that developments on neighbouring properties that result in the loss of privacy for their principal private open space will not be allowed.

(c) Weakening of solar access provisions

We are very concerned to see that the solar access provisions have been reduced. We are also concerned that the emphasis always seems to be put on what is required in relation to the solar access for the new development, rather than the impact of the proposed development on neighbouring properties.

(d) Failure to mandate minimum planting requirements in residential areas

Although the Government's documents such as "Explanation of Intended Effects" refer to the desirability of maximising opportunities for landscaping and canopy cover to reduce the urban heat island effect, there is little in the documentation that suggests this will be achieved.

The failure to introduce and enforce meaningful requirements in residential zones is a particular matter of concern. There has been a mandatory requirement to provide for a minimum planting area that would allow and encourage the planting of trees. How can abandoning this requirement be justified? Does ACTPLA really believe that a tree providing canopy cover can grow and flourish without the provision of an adequate planting area? If so, everyone is in trouble if ACTPLA remains in charge. Clearly, simply providing "guidance" on what might be appropriate is an extremely backwards step.

(e) Failing to provide for pre-DA consultation and not providing any opportunity for residents to comment/object on what is being developed on neighbouring blocks

Our understanding is that neighbours and others will no longer have the opportunity to comment and object to proposed developments, even where they appear not to meet criteria and have negative impacts on neighbouring properties. This is not acceptable.

We cannot and should not be expected to rely on ACTPLA always being correct and wise in the judgements they make about the acceptability of proposals, especially if the criteria become increasingly subjective. There are many examples in the past where the objection/appeals process has revealed undesirable aspects of proposals – especially impacts on neighbouring properties - that would not have otherwise been adequately taken into account.

(f) Changes that would allow more intense development of R22 areas

We are opposed to the proposed changes to R22 areas that would allow more intense development of all these zones. The R22 zoning areas were introduced after much debate to allow medium density developments to occur in these areas.

If there is now a case for more intense development for some of these areas, the appropriate course would be to change the zoning to R23 - but only after an opportunity for full consideration of the merits or otherwise of the action proposed.

It would be a mistake to take across the board action without taking into account the differences between the needs and circumstances of different districts.

3. EMPHASIS ON EXISTING SUBURB DENSIFICATION WITH NO REGARD FOR DIFFERENCES IN SUBURB CHARACTER, RESIDENTS' NEEDS AND WISHES, OR AVAILABILITY OF SUPPORTING INFRASTRUCTURE, ESPECIALLY PUBLIC TRANSPORT

ACTPLA has recognised that there are differences in the character and needs of suburbs. In principle the decision to proceed with the development of District Plans reflects that. Nevertheless, it is clear that the District Plans as currently drafted have not been developed with sufficient consideration of, and sensitivity to, those differences. Some suburbs are much more suited for densification than others. Our comments on the District Plan for the Inner South, and in particular its shortcomings with the proposals for Griffith, are set out below.

4. PROPOSAL TO ALLOW DUAL OCCUPANCY DEVELOPMENTS

We are strongly opposed to any across the board changes that would allow dual occupancies in the older suburbs in Canberra, especially the Inner South, by allowing dual occupancies on blocks in RZ1 areas or by reclassifying current RZ1 zones to RZ2.

The current zoning system has proved effective in allowing a range of housing options to be developed in the established older suburbs. It has allowed more intensive development in areas close to suburban centres, while helping to preserve the highly valued garden city character of the suburbs as a whole.

The restrictions on dual occupancies were introduced in response to widespread concerns about the developments that occurred when dual occupancies were allowed. Inevitably those developments resulted in the removal of much, if not all, of the tree cover on the blocks concerned, as well as an increase in hard surfaces, plus loss of amenity for many of the neighbouring blocks.

The impact was such that there was a general recognition that allowing this type of development threatened to change the character of the original garden suburbs beyond recognition. Nothing has changed. The retention of the current zoning system and the protections it provides is vital to preserving the character of the Inner South.

We note that ACTPLA's supporting documentation states that what is in mind is a similar concept to changes introduced for some larger blocks purchased through the Asbestos Buyback Scheme which allowed dual occupancy developments. This is a matter of some concern.

As the former owners of one of the "Fluffy" blocks concerned, we have taken a particular interest in what has happened since. In short, the block (located in [REDACTED], Griffith) which in 2015 had on it 9 large shade trees, as well as numerous flowering shrubs and bushes, a vegetable plot, and some grassed areas back and front, was completely denuded of all vegetation down to the last blade of grass.

A large two-story duplex, of a completely different character to every other building in the street, now occupies most of the block. Almost all of the rest of the block (front, side and back) is covered by hard surfaces, mostly bitumen. There are two residences on the site but – eight years later - one appears yet to be occupied. In summary, the development has resulted in a significant reduction in the "living infrastructure" of the suburb, an increase in the local heat factor, loss of amenity for neighbours and no increase in the local population. We note also that there are other Fluffy block sites in Griffith and neighbouring suburbs that are either still being redeveloped or remain unsold.

It is of interest that the "Canberra Times" of 27 February contains a report on problems experienced in the redevelopment of another "Fluffy" block at 18 Duke Street Torrens which was found not to have met a number of requirements.

We support the suggestion made by Ms Fiona Carrick (President of the Woden Valley Community Council) that a review should be undertaken of the Mr Fluffy dual occupancies and their impact on neighbours so that views on desired densification outcomes in our suburbs can be better informed.

5.THE DISTRICT PLAN FOR THE INNER SOUTH AND, IN PARTICULAR, THE PROPOSED FURTHER DENSIFICATION OF GRIFFITH

The Government has identified a large part of older Griffith as areas for “future investigation” – i.e., for future more intense development. It is in the nature of things that different areas of cities develop their own special characteristics and features, and attract residents who attach particular value to them. Significant parts of Griffith, especially those closer to Manuka/Kingston and the Griffith shops, have already undergone intensification and the population density of Griffith is relatively high. In that sense, we have already “done our bit”.

Other parts of the suburb, however, have retained the essential character of the original garden suburb. The houses remain predominantly single storey, red brick and terra cotta tiled, and large areas of trees and beautifully maintained gardens remain. This is not just something that is highly valued by the local residents. It is an asset for Canberra as a whole – admired by visitors to Canberra and making an important contribution to what makes Canberra different from every other Australian city. We should not be destroying such an asset.

Also, we should endeavour to cater for a range of lifestyle preferences. Some will prefer what they see as the vibrancy offered by inner city life. But many of those who have chosen to live in Griffith have done so because they value the beauty and tranquillity of the garden suburb environment, value growing their own vegetables and flowers and value the opportunities offered to connect with neighbours and others in the local community.

Although ACTPLA seems to be suggesting that more intense development provides greater opportunity to connect with others in the community, there is little evidence that supports this view. Certainly, our own personal experience - and that of other people we know who have had the experience of living both in the heart of large cities and in the Canberra suburban environment -is that there is much more connectivity and sense of community in Canberra suburbia than one typically finds in the centre of major cities.

A further consideration is that it is highly questionable whether Griffith is as suitable for further intensification as many other Canberra suburbs would be. Surely the emphasis should be on encouraging more intense development in areas served by rapid and efficient public transport.

The main focus should be on areas served by the light rail. That has been the focus for the Government and it needs to follow through on it. Griffith is very poorly served by public transport and there is no sign that this is going to improve in the foreseeable future.

Access to public schools as well as other services is also relevant. There are no public schools either at primary or secondary level in Griffith. In general, there is necessarily a very high reliance on private cars whether it be for access to employment, public education facilities (primary, secondary and tertiary), medical facilities, cultural/entertainment

facilities and the main shopping centres at Civic and Woden.

OTHER CONCERNS

- **We have reservations about this proposal and do not consider that it has been made clear why community housing is not most appropriately provided in residential zones.**

The provision and retention of community facility land is important to ensure that sufficient land is reserved for non-residential community use, including education, cultural facilities and aged care, as the population increases.

- **Redefinition of RZ2 to include more multi-unit development than currently allowed.**

The case has not been made for this. The appropriate way to go would be to change the zoning (eg to RZ3) where it can be demonstrated that a case has been made for more intense development.

- **Changes in the definition of floor level**

It is proposed to reduce the height from 1.8 metre to 1 metre and this seems a very good idea. But what is the definition of ground level? The purpose is to reduce the possibility of unacceptable loss of privacy and that is supported. However, some developers currently engage in the practice of raising the ground level by bringing in large amounts of soil to raise the ground level – are there going to be safeguards to prevent this?

- **Changes to RZ1**

It is proposed to include build to rent housing and community housing in RZ1. This use is already allowed in RZ1 provided they are single dwellings; this suggests that the intention is to have at least 2 dwellings on the block and should be opposed. It is misleading to suggest that multiunit housing is generally already allowed in RZ1 – it is only allowed on certain larger blocks.

If it is proposed to include community housing and build to rent housing as allowable uses, they should be subject to the same rules as private housing i.e. one dwelling only. It should be noted that community housing is of course already allowable. But community housing is not similar, as is claimed, to supportive housing, and should not be allowed to be exempt from the requirements that apply to private housing.

- **Changes to RZ2**

The case for across the board more intense developments in RZ2 has not been made. If there is a case for more intense development in some areas it should be dealt with by a rezoning proposal, as already noted above.

- **Changes relating to Demonstration Housing Proposals**

It is proposed to allow demonstration housing proposals to be incorporated into the Territory Plan, rather than being progressed as individual variations to the Territory Plan.

This should be opposed. Demonstration housing proposals should be located in the zones for which they are relevant.

[REDACTED]

[REDACTED]

1 March 2023

[REDACTED]

Griffith ACT 2603

From: [REDACTED]
To: [EPSDD Communications](#)
Subject: Draft Territory Plan and District Strategy.
Date: Wednesday, 1 March 2023 10:45:25 PM

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Would you please log my comment:

In the past weeks I have attended two Inner South community meetings and I have been impressed by the organisers of these meetings. I applaud them for the hundreds of hours they have spent researching the details of the new Draft Territory Plan and District Strategy. At these meetings I listened to the organisers and residents speak about the Plan and Strategy and I have no doubt that there is an overwhelming level of concern about the proposed changes. People are worried that the special character of the Inner South will be significantly damaged if the Plan and Strategy are implemented.

I have lived in Forrest in the Inner South for more than 23 years and I enjoy the leafy street scapes and the mix of historic and new dwellings. The wide streets lined by beautiful tall trees create a feeling of peace as one walks around the suburb. House blocks are large enough to support attractive plantings and there is an overall feeling of spaciousness and greenery.

The same comments cannot be made about the new suburbs where houses are jammed in with little space left on blocks for shrub and flower planting let alone tree planting, the streets are so narrow that the nature strips do not allow for shade trees and the heat in summer is significantly higher than in the Inner South. The same people who allowed such development are in charge of what will be approved in the Inner South under the proposed Plan and Strategy.

I would hate the Inner South to become as over developed and soulless as the new suburbs. I agree with the submission made by the ISCCC and ask that all the points raised by the ISCCC be implemented.

[REDACTED]

Forrest

(I consent to a de-identified copy of my submission being made publicly available as part of this engagement)

GENERALLY

The Strategy contains contradictions as it pertains to the eastern Curtin edge. While acknowledging constraints (such as some suburbs being hotter than others or potential for flooding), the overviews for proposed changes, forges ahead with more development over currently riparian, green open and treed spaces. It admits to being focused on new development along the light rail corridor. There appears to be a very strong bias for development along the light rail corridor. There is a lack of focus on development within the group centre, existing R2Z zone or within the Woden Town center zone where there is already a light rail transport node under development. For development along the light rail line to dictate planning thought is counter to proper broader planning principles for such a strategy. I refer to the 5 “Big Drivers” and 10 “Targets” and “Directions for Woden” in the “At A Glance” part of the Strategy.

POPULATION

The draft is based on projected housing demand to 2046 (4,100 dwellings) and 2063 (6,600 dwellings) which in turn is based on population projections.¹ It is not clear how this data is generated or its accuracy or the assumptions made to calculate the figures. Assuming they are about right, the requirements would be for up to 6,600 dwellings in medium to high density type housing over the 12 suburbs that make up the Woden District. This is an average of 550 dwellings in each of those suburbs, however this should be lower if higher density is accommodated within the Woden Town Centre and Phillip. What appears to be presented in the plan, particularly on the western side of Curtin, is to push for high density housing primarily along the light rail corridor. If the Northbourne Ave experience is anything to go by, we need to avoid Yarra Glen & Yamba Drive ending up being a canyon of high density/high rise buildings, either side of the light rail line and obliterating the amenity currently enjoyed by the surrounding suburbs.

TOWN CENTRE CREEPING NORTHWARDS

1. The proposal for densification along Yarra Glen/Yamba Drive, the eastern edge of Curtin, the eastern edge of Hughes abutting Yamba Drive and the roundabout with future development within the Yarra Glen/Yamba and Melrose Drive roundabout is a bizarre attempt to push the boundary of the Woden town center northwards along the light rail corridor. To describe it as “unlocking potential at the gateway to Woden Town Centre”² suggests this was a planning “thought bubble” to grab more land for high density development. Increased development within Woden Town Center where there is a major transport node is generally acceptable and logical, however to grab land that is vacant and pushing the boundary of a town center is not. This sets a precedent to grab any open or green space for intensive urbanization and will obliterate the notion of a garden city. Keep intensification within town centers.

2. The notion of installing “community and retail activities” or “public activity hubs” within the Yarra Glen/Melrose Drive Roundabout is bizarre in the extreme. This would be one of the most inhospitable, inaccessible spaces for such activities. To place such activities within a flood prone

¹ P 33

² P 97

stormwater channel area, completely surrounded by 4-6 lanes of traffic and bisect it with a light rail line makes one wonder what the planners of this Strategy were thinking. It creates an element of suspicion as to the true intent of the Strategy (e.g., is this simply a land grab or is it actually about planning a livable city). Such silly ideas only serve to undermine any other sensible planning proposals put up in the draft report.

DENSITY & ZONING

1. Densification of the suburb by infill development may be a possible way to cater for increased population and housing demand. However, a blanket approach over the entire suburb in RZ1 or RZ2 zone without ensuring adequate limitations on minimum block size AND adequate restriction on the building footprint on that block to maximise green surround and planting will only serve to create a hotter suburb and increase stormwater runoff into the important Yarralumla Creek corridor.

2. Densification by having RZ2 zones around group centers was integral to previous planning strategies. The RZ2 zone that surrounds the Curtin group centre remains under-developed with many blocks still containing detached dwellings on blocks in excess of 800 metres². To suggest “new” development zones depicted as light grey shading with a new “edge” street or “walkable street grid” along the eastern edge of Curtin facing the light rail corridor (described as “built frontage with 3,6 or even 12 storey buildings) is de facto re-zoning for higher densification than current RZ2 over a much broader area. It fails to address or reference previous planning strategies to allow higher density around town centers within RZ2 zone.

3. The Strategy claims there are no ‘greenfield’ sites within the Woden District. This ignores the North Curtin horse Paddocks recently given over to urban development. It is notable that the nearby Yarralumla Brickworks site also represents potential for urban infill and whilst not strictly speaking “greenfields” represents a significant contribution to new housing potential nearby.

RIPARIAN CORRIDOR

1. One of the sensible proposals in the Strategy is to recognize the blue-green network – in this case the Yarralumla Creek channel and green corridor that runs parallel to Yarra Glen along the eastern edge of Curtin. The catchment for this water body extends from Torrens/Farrar to the south and picks up all the surface runoff and stormwater from all the suburbs in Woden District. Its relevance as part of a blue-green network strategy cannot be underestimated. It provides green connectors from the Mawson Group centre, Canberra Hospital, Woden Town Centre and on to the Molonglo River and Lake Burley Griffin. It provides open space utility for residents, contains walking and cycle paths and allows extensive tree planting. To return this channel to a more natural setting (it is currently mostly lined with concrete until North Curtin) is welcome. To place roads (“edge streets”) on the green corridor space, or allow urban densification within or adjacent to it is not sensible and represents one of the major contradictions in the draft Strategy. On one hand, it is reported on as a constraint in the report ³. Yet on the other hand, the proposal for new roadways and intensive urban development within or adjacent to this corridor, ignores and exacerbates the problem. To develop this corridor as suggested is contrary to the key drivers set out in the Strategy, will degrade an essential amenity and exacerbate flooding.

2. The Yarralumla Creek floods regularly given the extent of its catchment. This is recognized in the Strategy.⁴ In October 2022, large tracts of the concreted Yarralumla Creek channel along the south

³ P126-127

⁴ p99

and north Curtin sections were ripped up by the intensity of flooding following a peak storm. This was the first time since the channel was concreted in the 1970s that such damage occurred. The catastrophic floods that killed 7 people following a peak storm in January 1971 are well known. These are clear signals that this corridor is under enormous pressure and needs work and protection to be able to handle future flood events. Given the size of its catchment, densification of urbanization within the entire Woden District areas will only exacerbate these Yarralumla Creek flooding events. Densification of urban development within and adjacent to this corridor will intensify localized flooding as Curtin is the last suburb before it flows into rural horse paddocks and the Molonglo River downstream. The re-concreting of the channel following the December 2022 damage, was a lost opportunity to commencing restoration of the creek to a more natural state as well as integrate features such as the water-gardens at the south end of Curtin to capture and slow urban runoff before it enters the Molonglo River.

3. The ACT has its own Codes on Water Sensitive Urban Design⁵. They are referenced in the Strategy⁶. Any suggestion of development within the existing green corridor where the creek is located would be contrary to the principles set out in the Code.

EDGE STREETS / WALKABLE STREET GRIDS

1. Despite being a broad planning document, the draft Strategy incorporates apparent new roadways. Their purpose is ill-defined as “clarifying the urban edge” or providing “more walkable access locally”. The proposal for such roads is extensive and, in some cases, doubles up on existing roads that define the urban edge (e.g. Service St, Martin St).

2. The urban edge is already well defined by existing house boundaries, walking and cycle paths. To obliterate these and install another road is pointless – except to “unlock sites for development”⁷. This would suggest a land grab to convert green space into urbanization in the future.

3. The so called “walkable street grid” does not follow contours and would need massive earth works, bridge crossings or other means of connecting. Some are proposed across existing housing meaning a loss of dwellings.

4. Roads and streets will take out green space that assists in ameliorating surface runoff. Runoff will be increased and further pressure placed on Yarralumla. The whole idea of new edge streets or a walkable street grid is a poor one that has no merit.



1 March 2023

⁵ https://www.environment.act.gov.au/water/water-strategies-and-plans/water_sensitive_urban_design

⁶ p127

⁷ p 121

SUBMISSION

The proposed new ACT Planning System and the Draft District Strategy – Inner South

Summary

We fully support the submissions made by the Yarralumla Residents Association and The Inner South Community Council.

We do not support the proposed outcomes-based planning system as it does not address the significant issues with the existing system – if anything it is likely to exacerbate the existing problems.

At an absolute minimum, the planning system should have clear, quantifiable measures of compliance underpinning enforceable outcomes with a minimum of discretion for the Planning Authority.

The proposed system does not address existing issues with urban tree cover in the newer Canberra suburbs and is therefore at odds with the ACT Government's claimed green credentials.

The proposed Inner South District Strategy is not supported.

It has the potential to destroy the amenity of the established suburbs of Deakin and Yarralumla, both of which already support a significant proportion of unit type housing.

No rationale has been presented for the proposed Transect approach nor have the criteria for the Urban Character Types been explained.

There are numerous inconsistencies in the proposed strategy which suggest that it has been developed at a high level without detailed knowledge of the affected suburbs – certainly the level of consultation has been totally inadequate.

The residents of Yarralumla and Deakin deserve better than this if the nature their suburbs is to be so drastically changed.

The developers of the draft strategy need to go back to the drawing board and engage with the residents.

Proposed new ACT Planning System

While we agree that the existing system needs reform we do not support the proposed outcomes-based planning approval system.

Residents of established suburbs, including our suburb of Yarralumla, have countless examples of inappropriate redevelopment – one is documented in today's Canberra Times (page 6 "Build now, ask later approach backfires for developer").

The problems with these redevelopments, which often 'game' or even ignore the existing planning processes, include:

- lack of consultation with neighbours,
- excessive scale,
- reductions in solar access and privacy for neighbours,
- 'creative' approaches to plot ratios,
- reductions in canopy tree cover,
- design that is not sympathetic to the existing neighbourhood,
- deep excavations with inadequate engineering design and oversight, and
- excessive build times with five or more years of disruption and unsightly building blocks not uncommon. The redevelopment opposite the Yarralumla shops being a good example.

Giving the extremely poor record of the ACT Planning Authority in this regard, it is unclear how an 'outcomes-based approach' with less objective measures of compliance will address these issues.

At an absolute minimum the system should have clear, quantifiable measures of compliance underpinning enforceable outcomes with a minimum of discretion for the Planning Authority.

A further example of the problems with the existing planning system are the new suburbs of Coombs and Wright. Viewed from Mount Stromlo it is clear that these suburbs are heat islands and likely to remain that way with little space for urban tree planting. The comparison with older Canberra suburbs is worrying.

The new planning approach and draft District Strategies pay lip service to tree cover but nowhere in the documents is there any evidence of just how this might work. The approach is completely at odds with the ACT Government's claimed green credentials.

Finally, we note that the criteria for exemption from the DA process are not yet available. As this process is frequently misused under the current system it is clearly a critical part of the new system and will require a separate consultation process.

Inner South Draft District Strategy

We do not support the proposed Inner South District Strategy.

The strategy has the potential to destroy the amenity of the established suburbs of Deakin and Yarralumla, both of which already support a significant proportion of unit type housing (over 30% in the case of Yarralumla). In contrast to the proposed strategy, the existing higher density housing is generally sympathetic to the existing neighbourhood.

No rationale has been presented for the proposed Transect approach nor have the criteria for the Urban Character Types been explained.

There is no evidence that the authors of the draft plan had any familiarity with Yarralumla and Deakin with numerous inconsistencies such as embassies and schools being identified as suitable for higher density housing and suggestions that Adelaide Avenue, a key arterial connection between Woden and the city, is challenging for pedestrian to cross and could therefore become a “vibrant , multi-modal corridor that better connects into local neighbourhoods in Yarralumla and Deakin”.

One is left with the impression that densification along the route of the Woden tram is required to support the business case and that a ‘big hands, small map’ approach has been taken to reproduce a Northbourne Avenue type of approach on the south side.

It is telling, that despite numerous requests, a map showing the Transect approach in sufficient detail to identify all the relevant streets, was not made available until 15 February 2023.

The residents of Yarralumla and Deakin deserve better than this if the nature their suburbs is to be so drastically changed.

At a minimum, they deserve a proper consultation process.

As part of that process, the planners need to explain how the essential character of the suburbs will be maintained, what changes will be needed to roads and services, how the process of rezoning will be undertaken and how land will be aggregated for development purposes, given the extent of the redevelopment that has already taken place in Yarralumla. They might also explain how the tree canopy will be maintained and even enhanced by the proposed changes.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Yarralumla ACT 2600

[REDACTED]