

Please see below my submission to the 2018 ACT Housing Choices Collaboration Hub. This situation is still the case and my views remain the same.

In its response to Housing Choices Collaboration Hub Report, the ACT Government provided in-principle support for recommendation 12 (options for allowing dual occupancies with separate title in the RZ1 Suburban Zone). Specifically it noted that this recommendation will form the basis of a Territory Plan variation. The Draft new Territory Plan includes no such provisions.

It has been over four years since the Housing Collaboration Hub Report and it is unclear why the ACT Government continues to delay implementing a recommendation that it agreed to and that the Housing Choices Collaboration Hub found broad community support for.

From: [REDACTED]
Sent: Tuesday, 6 March 2018 10:54 PM
To: Terrplan@act.gov.au
Cc: steel@parliament.act.gov.au
Subject: ACT government Housing choices [SEC=UNCLASSIFIED]

Dear committee

I am a widow living in a five bedroom home, which is one of two properties I own on a 1500 square meter dual occupancy block. I would like to keep one for rental income and sell the other in order to downsize. Under your present law, if I wish to downsize, I have to sell them as one property. Based on advice I have received from real estate agents, this will result in significantly less revenue than if each property were sold separately. This has impacted my financial capacity to sell and downsize to a more appropriate sized property for my circumstances.

I believe it is inconsistent policy to allow the building of a second dwelling on land but to not subsequently allow it to be separately titled.

The law that now permits Mr Fluffy blocks of 750 square meters to be separate titled, should be applied equitably to the rest of the community. The ACT government is giving rights to these property owners (including those in the same suburb), that are denied to me.

I strongly support a change of zoning to allow large blocks in older suburbs to be sub-divided.

I've also cc'd in my local member, as I'd like him to be aware of some of the issues facing his elderly constituents.

Regards

[REDACTED]

Draft Inner North and City District Strategy comments:

p.115, Figure 39: parts of the Downer area are coloured yellow or pink, which relate to the transect analysis; the legend shows that yellow is 'general urban' and pink is 'urban centre'. Reference to Appendix 1 describes the urban design principles associated with these character types, labelled T4 and T5 respectively. The Appendix describes higher density and building height in the T4 and T5 zones than currently exists in the current RZ1 or RZ2 zones that apply in the Downer area. I have two queries/comments about this:

- not all blocks within the transport connection arcs at Figure 39 are marked with the T4 and T5 transect colours: it is not apparent why this is so. While I am aware that there is a small park in that zone (the 'Berry St-Legge St' park), there are also detached dwellings, whose blocks retain the grey colour of T3 suburban, while adjacent blocks have the yellow T4 or pink T5 colours. This inconsistency needs to be clarified/explained.

- areas adjacent to the Berry St-Legge St park (in both Legge St and Berry St) are currently zoned RZ1 and are (mostly) coloured T5 in Figure 39, which allows for up to 6 stories and commercial functions at the ground floor. I would strenuously resist the creep of the Dickson urban centre into the suburban area of Downer. While one side of Blacket St is currently zoned RZ2, which allows a mix of low rise and low density housing, I would resist the creep of denser, higher housing mixed with commercial housing into the suburban area, with the exception of the Northbourne Ave corridor as proposed in the City and Gateway framework. Reasons for this resistance include:

- the character of the suburb would irrevocably change and the remaining single level blocks would lose, amongst other things, their solar amenity;
- the suburb is a cool oasis, for both humans and wildlife, due to the mature trees and gardens; increasing density would likely lead to the loss of some of this flora, resulting in a hotter environment and loss of wildlife habitat;
- school capacity is already a significant problem in the area, which is not being adequately dealt with at the moment; an increase in density will exacerbate this problem;
- the area's suburban roads are already clogged with parked cars and increasing traffic; increased density will make the roads very difficult to navigate because they're not designed for the volume of traffic that would be generated.

Downer

10 January 2023

ACT Planning System Review and Reform Project

10th December 2022

Feedback on draft district strategy for Woden

I am a long-time resident of Curtin and would like to provide some feedback on the draft district strategy for Woden. Firstly, I'd like to say that I am excited about the transformational potential of light rail for Woden. I'd also like to say how wonderful I think it is that these future-focussed district-level strategies are being produced.

As to the content of the draft strategy, I am particularly enthused about the proposed enhancement of Yarralumla Creek, the "light rail boulevard" in Woden north and proposed new "gateway" to the town centre, and the vision for Athllon Drive as a potentially charming urban corridor – dare I say a "Northbourne of the South."

I have tried to organise my comments around the five "big drivers." Some of my comments do refer to elements that are already noted in the draft document as requiring further investigation (housing demand, future community use/recreation needs, and design planning for the Curtin horse paddocks/Yarra Glen interface), but I have included them anyway.

Blue-green network

- I think there is a wonderful opportunity to transform Yarralumla Creek into a linear recreational area and active transport spine for Woden. As well as the already-flagged waterway naturalization and tree regeneration, I'd also suggest adding more seating and upgrading the pathways – ideally, separated paths for low-speed (pedestrians) and high-speed (bikes, scooters) users, and upgraded lighting. I also suggest identifying specific areas along the corridor to "upgrade" into parks/playgrounds and maybe a some "micro-forests" so there are delightful destinations to stop and relax along the pathways (the open space in Holman Street, Curtin, is one example of an area that has such potential – and making it a lovely urban park with facilities would no doubt be valued by future residents as the dwelling and population density of the Curtin edge area increases, especially if working from home continues as a trend). There have been a lot of successful urban waterway transformations in Singapore which provide for both ecological and recreational uses.
- The strategy could identify more "pocket parks" (ideally with good solar access) in areas where densities will increase. For example, the owner of the former Putt Putt course has publicly indicated their intention to have that land rezoned for apartments. A reasonable condition that might be applied to such an approval would be for them to develop a pocket park – I'd suggest the northern-most tip of that property, because it is sunny and has some mature trees – for use by the current and future apartment dwellers of Woden north.
- As the only significantly-sized urban park in Woden, Edison Park could benefit from a significant upgrade and a long-term master plan to ensure that it can provide for the recreation and relaxation needs of an increasing number of residents living in nearby high-density housing with limited access to green space.

Economic access

- There is not much in this strategy about the Canberra Hospital precinct (I know it has its own master plan), but it is an important part of Woden, in terms of employment, community use, and its sheer physical presence. I think the land currently used for the surge centre in Garran and the staff car-park in Phillip should be permanently set aside for healthcare uses, which might be either future expansion of the hospital, or new public health services, or relocation of the private professional chambers from Corinna Street in Woden town centre at some point in the future. This would send a signal to the community that those areas are reserved for healthcare uses, not for open space or residential uses.
- I am pleased that the strategy refers to protecting the services/trades zoning for Phillip. This is framed as protection of employment lands, but it should also be recognised that there is a need to have an area in Woden that can accommodate the sort of “messy” and larger-format businesses that residents need access to. My concern with developers wanting to build apartments in Phillip or transform it into “the new Braddon” is that once zoning allows for that, then the current businesses will be priced out of the area so the land can be turned into apartments, and/or new residents will object to the noise and other inconveniences these services/trades businesses generate (I know that residents and light industry can and do co-exist in other cities, like the vibrant suburb of Richmond in Melbourne where I once lived, but people in Canberra do tend to complain a lot).
- I would also note there are a lot of strange little businesses operating in Phillip – yoga and dance studios, specialty food shops, massage therapists, disability service providers, etc. – and these sorts of businesses are, I think, so important to the social fabric of the community, as well as providing employment. Previous Woden town centre master plans floated the idea of “shop top” housing in Phillip, and there may well be some potential to introduce this sort of residential development without displacing the current types of business activity, but potential land use conflicts would need to be managed carefully.

Strategic movement

- I know pedestrian bridges are not currently in fashion, but I think a few of them could really enhance connectivity and active travel throughout Woden, specifically: (1) across Yarralumla Creek from the future development area in the horse paddocks to the existing shared pathways in Curtin; (2) from the horse paddocks across Adelaide Avenue to Deakin West, which I think is already foreshadowed as part of a light rail stop; (3) across Cotter Road from the future LDK retirement village linking to the existing shared pathway network in Curtin (I’d also include a bus stop on Cotter Road outside that development), and (4) from Swinger Hill across Hindmarsh to the pathways connecting to Woden town centre and the hospital (proposed as part of Swinger Hill’s initial planning, but never built).
- I wonder, as part of the light rail construction, whether it might be possible to consider Copenhagen-style bike lanes along Adelaide Avenue and Yarra Glen. I know there is already an off-road shared path from Deakin to Hughes, and then from Curtin to Woden, but these are more meandering and less likely to be used by commuters. Many people – myself included – are too intimidated to ever use the on-road cycle paths for commuting.

Sustainable neighbourhoods

- I support the increase of high-density in the town centre and medium-density around group and local centres. The challenge is how to promote diversity of medium density styles.
- Personally speaking, I live in a detached house with a garden, and for now I like it very much, but in the future I would probably like to downsize to something smaller. For me,

that is not going to be to an apartment (I like to have a private garden space because I grow vegetables, keep chickens, make compost, and practise *freikörperkultur*), and probably not to a retirement community (at least not right away – but if/when I did move into such a place, I would want one close to the light rail, like The Grange in Deakin or St. Andrews in Hughes – so a few more places like that along the light rail route would not be a bad thing to encourage), but I could see myself downsizing from a house to a separately-titled courtyard townhouse, or a maisonette in a low-rise, cottage court-style development. Wherever I moved, though, I would want to stay in the same area. There is really nothing like that around Curtin or the nearby suburbs. Aside from Swinger Hill and a few areas of Pearce, there is not much diversity of housing in Woden at all – it's either a house or a flat.

- My suggestion is therefore to designate some development sites for non-apartment medium density development – and, perhaps, government could partner with developers to build some “missing middle” demonstration projects, like London-style terrace houses around a shared garden square, or Los Angeles-style courtyard group housing. Some sites that immediately come to mind are the former north Curtin school; the corner of Theodore and Martin streets in Curtin; Devonport/Heysen Streets between Lyons and Weston Creek; and a portion of the future horse paddocks development.
- On the horse paddocks development area, there is a design opportunity that I really feel ought not to be missed to include a landmark terminating vista at the north-east corner of the area, which looks straight down Adelaide Avenue to Parliament House and is where the road curves around to the south. This could an apartment building, of high design quality and much taller than the others around it, or some sort of monument or sculpture (see figure at right, where I have inserted a dot over figure 38 which I shamelessly copied from the draft strategy).
- There could also be provision for some community gardens or allotments as part of the horse paddock development, perhaps as a visual barrier between the residential area and the diplomatic area (because the embassy compounds will probably be all ugly high security fences anyway). There could also be scope to include community gardens somewhere in the large verge area between Hughes and Yarra Glen, which could provide gardening opportunities for the growing communities of apartment-dwellers at Woden north and in the town centre.
- It's already mentioned in the document, but I'd like to emphasise the importance of ensuring good, direct pedestrian and cycle links from the horse paddocks development into Dudley Street (and onto Yarralulma shops and the future Brickworks development), as well as into the established part of Curtin, so that this new node is not isolated.

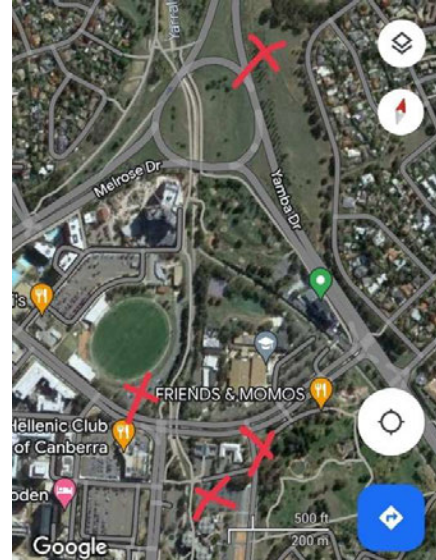


Inclusive centres

- With regards to the future “light rail boulevard” (p.121) at Woden north, I wonder whether provision could be made for an outdoor market along this strip, as a potential future home for the weekly Southside farmers’ market currently located within the Canberra College. The market atmosphere is already vibrant, but it could really be something special on this strip in the heart of the town centre and help to truly activate it, like the street food markets of London or Hong Kong, or Gleadell Street in Richmond, Melbourne.
- With regards to community facilities (p.89), Woden has a good range of outdoor sporting fields but limited arts or cultural facilities. An arts centre seems to be an obviously missing component, compared to other districts (a hardware store and office supplies store are also

missing components, sadly beyond this strategy's scope). It would be good to at least identify a preferred site for an arts centre – perhaps as part of the northern gateway area.

- The strategy is ominously silent on the future of the swimming pool. I personally have accepted that it is a matter of when not if this much-loved but neglected community asset permanently closes, and I note a decision has already been made to construct a new ice skating rink in Tuggeranong. I am sure that developers have their eyes on redeveloping the current pool site into apartments – and it probably is a great location for apartments in what has become a high-density living enclave. With that in mind, this strategy should identify a site for a future government-owned/contracted aquatic centre in Woden town centre, which could be integrated with other indoor sporting facilities. The pool at Stromlo is terrific – I swim there twice a week – but as the population of Molonglo, Weston Creek, and Woden grows, it won't be able to meet demand. It is also not very easy to access by public transport, at least not from Woden. The current Woden swimming pool can be easily accessed by public transport, and is walking distance for many office workers (and future CIT students). If the current site cannot be retained – and, ideally, upgraded to an all-weather facility – then another site should be reserved. I think there are at least four such possible sites (see map at left): (1) between Yarra Glen and Webster Street in Hughes; (2) at the north-west corner of Edison Park; (3) on the surface car-park next to Callam Offices; (4) on the Launceston Street bus layover site, which I understand is only a temporary facility during the interchange/CIT construction.
- Regarding the northern gateway (pp.97, 121), I think there are exciting transformational opportunities here but it is vital that any changes made are flood-safe (effective flood mitigation engineering largely explains why it looks the way it currently does, with its Soviet-style monolithic drains and intimidating raised roundabout), and are sensitive to the families of the people who died there in the 1971 tragedy. Some people may consider commercial or retail development at this site to be disrespectful or crass. Using that land for new community facilities, on the other hand, could be seen as a memorial tribute.
- Finally, on the always controversial subject of car parking (which I know every planner *loves* to talk about), I do wonder whether a future compact, decked parking structure should be identified for a portion of the Irving Street surface parking lots (the southern section, between the current pool and the oval) to ameliorate the upcoming reduction in parking spaces around the town centre, and to also allow for the northern part of Irving Street to be used for other purposes as part of Woden north's transformation. It used to be a daytime-only recreational precinct, now it's a high-rise bedroom community – but with the light rail and its accompanying boulevard, and the manifold options that the surface parking lots offer, this area could well become a kind of "Braddon of the South" over time.



Thank you for the opportunity to comment. I am excited to see what the future holds for Woden.

Yours sincerely

[Redacted signature]

ACT PLANNING SYSTEM REVIEW AND REFORM

Timing for Community Views on a large Planning Document

As is typical with ACT Government, a huge document about change is released for community comment over the summer holiday period. Obviously, the community's views are not valued once again! It should be noted that Transport Canberra's *Moving Canberra* consultation also occurred over a similar period three years ago. As a result, feedback received is generally from only a limited percentage of the community and should not be set in concrete – there are certainly many flaws in the current public transport service!

This documentation in particular (like many DA's) is way too vast to expect people in the community to read on a computer screen, and way too expensive in printer ink to print. Why are printed versions not available for community to take and read? It is well known that the percentage in the community who respond to Your Say issues is extremely small.

Discrimination for Retirees

It should also be noted this documentation suggests quite a focus only on those members of the community who are in the workforce – especially when public transport is being mentioned. There appears to be a lack of comprehension by those responsible for compiling this documentation, about those who have retired and the lifestyle they lead. Neither ACT Planning nor real estate agents have a clue about what “downsizing” means for retirees either – perhaps they need to start asking. At present this demographic in Belconnen has been severely chastised for daring to have a life outside the Belconnen District, with the 32 bus route being cut to only hourly services during the day, in order to commence construction for the light rail to Woden. Why please, it is a very popular route for retirees, due to its efficiency, with unofficial park and ride options? Transport Canberra does not have the decency to address this issue.

Explainer

While the Explainer indicates that the community has been listened to since 2019, we are not aware of any of this information. Unless, you spend every day looking at “Your Say” to see what's there, communication with ACT Government is limited – it is generally not consultative – it is much more about what ACT Government tells us – we are not genuinely asked! If we do question anything, we are completely ignored, and never receive a response. We had no idea that there were “pop-ups” available in November. ACT Government's communication style is abysmal, and needs to be greatly improved to all parts of the community.

The chaotic way this documentation is presented, is very difficult to know what is being asked. However, on this basis, we have provided our own thoughts below as laypeople in the community. As per the documentation, there is no order in which our comments are structured.

Draft Belconnen District Planning Strategy

Your Question: *Is the character of your district reflected well in the district strategy?*

Response: *No*

While Belconnen does have the largest population of the nine districts – not sure what unique characteristics would be! It should be noted that we are original Scullin residents since 1969. There are very few problem issues which have been addressed since. The

Draft Belconnen District Strategy Plan (map) is not self-explanatory, the same legend is used for all District Plan's with many items listed not relevant to the specific District. This appears to be very slack on the part of those who developed this paper!

What residents value about Belconnen

We agree with very little of what is listed on the Draft Strategy, and these are our thoughts:

- Anything we have valued in the past, has only deteriorated since, especially in the last 10-20 years. Belconnen is very "scruffy and untidy" – all due to a severe lack of ACT Government maintenance (storm water cleaning, grass cutting, footpath repairs – where you can find a footpath, etc, etc) or enforcement of the maintenance rules for residents, eg car bodies in front yards and nature strips, overgrown trees and shrubs on footpaths, vehicles parked on footpaths, dogs consistently off-leash, etc, etc.
- Lake Ginninderra amenity? Noise levels from Ginninderra Dr traffic very unpleasant; with surroundings poorly maintained by ACT Gov – this is the last place we would choose to take a recreational walk for health and wellbeing, as it has no value for us – we choose to walk in the original Canberra, where suburban planning maintenance is so much better.
- Being surrounded by green open space, that should be "sheep paddocks" shouldn't it? Not many places where a picnic blanket could be put down.
- Don't know where the foot and cycle paths are in the suburbs – never been any decent paths in Scullin – what paths are there, were laid before construction of houses and many start nowhere and go anywhere. The only cycle path from Scullin (towards Melba) has not had any work since construction in about 1978/80 – they were cycle only paths, no walking, etc!
- With only Page between Scullin and the Town Centre, there has never been decent pedestrian access to the Town Centre. ***How long does any Government need to sort this problem out? If you want us to leave our car at home, you need to give us something to walk on!*** Did you know there is no ability for the people in Page/Scullin to cross at the Southern Cross/Coulter Drs/Luxton St intersection. It can only be crossed on the Florey side of SCD. According to Shane Rattenbury MLA in 2013 a footpath on the Page/Scullin side of SCD was a high/medium priority – ***10 years ago! Where is it, are we ever going to see it?***
- Inadequate paths to walk to the nearest shops. City Services actually had a path removed very quickly across Belconnen Way a few years ago, without any community consultation – why? – because they believed we could not judge whether it was safe for us to cross – we are mid 70's now, and can make a judgement on our own please – like many others who still cross here! Very limited restaurants within walking distance of this area. Westfield have the monopoly on the restaurants – which are generally chain junk foods. No restaurant strip anywhere in Belconnen district, let alone the Town Centre! Unlike Dickson, for example, which has a number of cafes and restaurants which provide a sense of community – as does Manuka! What's gone wrong with Belconnen Planning?
- Belconnen town centre is far too congested with high-rise apartments, and too many traffic lights – a very unpleasant place to be! We rarely visit there – it is not a "good feel" area, due to traffic & people congestion – and too many smokers on the streets!

Future directions

Big Drivers - Directions

- ***"Blue-green" network*** – a very unfortunate analogy, especially given the ACT has problems with "blue-green" algae in its lakes! So, not sure what is meant by the "blue-green" – is it "water-grass"? We suggest green space means a park where you can throw a rug down, where the grass has been planted and maintained as a park –

nowhere in the Belconnen suburbs like this. We think “green” refers to original sheep paddocks!

- *Strategic movement to support city growth* - Connecting Belconnen town centre into the light rail network, especially if it were to take the current slow “Rapid” bus route into the City, will be cumbersome with so many corners and a lot slower than the current buses – the slowest bus network ever from Belconnen. The current buses into the City are far slower than the old 333 route which had you in the City very efficiently – as that was the purpose back then – get people there quickly. This route was the best patronised one ever in Canberra! If light rail must come to Belconnen – Belconnen Way direct is the only way to go.
- *Sustainable neighbourhoods* – due to the Belconnen Mall not being constructed on the planned site, the town centre has always been faced with many challenges, especially traffic movement, whether it be by vehicle, foot, bicycle or public transport. The undulating terrain has created challenges, which have not been taken up by the ACT Planning to take advantage of and do things differently, eg walking uphill to both the western trades area edge and eastern edge (College St) is challenging for many. Why have the trades area laneways not been used for artwork or stories about Belconnen’s early settlers and achievers, for example – there are many. Look at Melbourne’s example of art in their laneways – they attract people. Surely Belconnen is not all about “Westfield” – noting that many think otherwise! We know Westfield believes it is all about Westfield!
It should be noted that Westfield is private property – Westfield have asked people to move on from sitting together in the centre and chatting. Our elderly neighbours would meet up with other couples, and while the women shopped the men sat and chatted. Also, our son, while at Uni would meet up with old school friends – both these groups were asked to move on by Westfield security – because it is private property, they didn’t want people “hanging around”!
- Belconnen Town Centre is still waiting on public toilets in the Service Trades area – they’ve been promised for years and we’re still waiting!
- *Inclusive centres and communities* – reference is made to north and west Belconnen – there is no (never been) official areas in the Belconnen district defined as north, south, east or west Belconnen, and therefore should not be used in this document

Initiatives

It should be noted that, like all the satellite town districts in Canberra, each of them has a Town Centre, but none of these towns are actually in the centre of the district. As a result, the communities furthest away from the Town Centres, are left with very poor public transport options, limited recreation/entertainment options and general connections through excessive distances.

Draft Belconnen District Strategy Plan

It is unfortunate that the Legend for this Plan is shown using grayscale font – this is the case with any “Planning” or “DA” documents – it is difficult to read. There are many issues which do not appear to be self-evident in this map, eg what is it supposed to be either telling us or asking us? There is no legend with terminology meanings. Problems on this map include:

- Why is there a Local Centre marked on this map in Hawker, in the vicinity of Hawker College? This was the original site for “a shop” in Hawker, which was canned many years ago and replaced with the Hawker Group Centre, near Belconnen Way.
- Why is the Weetangera Local Centre not shown on the map?
- What is meant by the *Future Investigation Areas – Scullin is included in this yellow shaded area*? Given we live in this “area”, does this mean we will be forced out?

- Neither a current or proposed light rail corridor is shown on the Belconnen District map – why not?
- Map indicates a Local Centre in Bruce – not aware there is such a place.
- Florey is the only suburb to benefit from two Rapid bus routes – does everyone else in surrounding suburbs, need to find their own way around?
- Where is the pedestrian connections to Belconnen Town Centre. In the 60's & 70's a few paths were laid prior to the construction of houses – and there it has remained. Still no decent pedestrian access to the Town Centre!
- To make Scullin an Age Friendly suburb, the proposal is to dig up some of these short original paths which start nowhere and go nowhere, and replace them with wider paths. How does this translate to being Age Friendly. We want paths to actually go somewhere, eg Local Group Centre and Town Centre.
- **DO NOT** make an internal decision and waste funding by implementing priority active travel routes different to what has been used in the Belconnen area for years. This needs to be a decision by the community itself, otherwise we will be no better off.

Existing Connections

Issues with this Draft Strategic Plan

- Why is Belconnen Way (a main connection to Belconnen suburbs) not included on the Draft Plan as a connection route?
- An existing secondary connection route is marked from a Rapid Bus stop on SCD, past the Scullin Oval, to Scullin LC, it appears to turn right into Ross Smith Cres, right into Mackinolt St, & crosses Belconnen Way into Hawker. Not sure why this is seen as a connection – it maybe for vehicle travel, but not what people have ever used in this area. From SLC (or north of) the main route for pedestrians and cyclists, is to come up McIntosh St (behind SLC) turn right into Parer St, left into Parer Pl, and arrive at Chewings St – half the distance of what is on the map. It should be noted that Ross Smith Cres on the left side travelling towards Chewings, requires the left leg to be shorter than the right leg to negotiate, as the path slopes so much down to the road edge – as is the case for many of the original footpaths laid like this!
- The map shows the SLC with a purple ring around it connecting to the R2 bus stop on Southern Cross Dr (SCD). There is no explanation as to why this is on the Plan like this. It indicates that the purple link has a 200m connection between the R2 bus stop and SLC. This is incorrect, it is 700m to walk from the SLC to the City bound stop (via R2) on the Florey side of SCD – this still makes the stop heading to Kippax Group Centre (KGC) about 600m. See three photos below, of what the community is expected to use and the lack of obvious maintenance.

These 3 photos show the poor state of the underpass under Southern Cross Drive to get to the R2 bus stop from Scullin to Florey and vice versa



Why are we paying rates?



These underpasses are all dark (no lights) and dangerous, with persistent water, mud, dead rats and other debris – their main purpose is that of a drain, which are never cleaned by City Services! After negotiating the mud it is a short very sharp climb up to the bus stop. Scullin and Page are *Age Friendly Suburbs* – good ACT Government transport planning, expecting this demographic to hike to the R2 route! We are very active mid 70's, and it takes us about 12 minutes from our home behind the SLC to reach this stop, and it is equivalent to 11 flights of stairs (according to Fitbit) to walk up the hill back home. As the R2 goes to the Canberra Railway Station, carrying an overnight bag is no easy chore in the rain - good planning again for this community!

There are two further underpasses between Page and Florey. All three underpasses on this stretch are all the same – dark (no lights), dangerous and worse still, you must walk in the opposite direction of your intended travel first – which is Belconnen Town Centre and beyond – they are not set at right angles to SCD. It should be noted that walking north for 12 minutes, in order to travel south is not an efficient option. Ask yourself the question – if you want to go to Goulburn, would you travel via Yass to get there? Hopefully this explains the hopelessness of wanting people in Scullin and Page to catch the R2! On a recent trip to Sydney via Murrays Bus, it took 1 hour to get home on the R2 from the City Interchange, including the walk in the rain, to our front door - very inefficient! It is imperative that improvements and changes are made to the Transport Planning, as the needs of this retiree demographic is being forgotten about.

If we travel by bus anywhere, it is to depart Belconnen district – mostly to the City or the Parliamentary Triangle – live & movie theatre, an exhibition/art gallery, a restaurant, etc. Belconnen does not offer any of these activities. It is also not efficient to have all buses travel the same route through Belconnen Town Centre. Unfortunately, Transport Canberra does not provide the timing for each stop (nor do the drivers stick to their timing points – not good when you trust the R3 to catch a flight), so you need to guess when to expect the bus, but if the bus was caught at the stop identified on the bus map, it is likely to take 10 minutes to reach the Cohen St stop, with three sets of traffic lights! The 42 bus route through Scullin & Page would take a maximum of 10 minutes from front door to Cohen St – and all travelled in the direction of your destination. The journey to get to the R2 bus stops on SCD would not meet the Age Friendly suburbs criteria at all.

Rapids are the “slow alternative” as they all stop at all stops – there is no special express/limited stop services! We have often waited for No 32 route at City West stop towards Belconnen, and notice you can have more than one R2, R3 and also 3 R4's at this stop tailgating on their way to Belconnen. The R4's especially just drive without watching their timing points!

Transport Canberra's Journey Planner is useless, as it uses a map which does not recognise laneways to get to the bus stop. This is also a problem with City Services grass cutting “service”. When you need to use a scythe to get through an overgrown laneway, City Services do not see the laneways on their reference map either it seems! How about sharing some of the Canberra by Suburbs maps!

Our preferred bus route into the City is the No 32 route – we, and many other retirees have used this route as an unofficial Park and Ride for a very long time, as it is by far the fastest way into the City. However, to ensure the Woden people get their light rail connections, Transport Canberra has now reduced this service from half-hourly to only hourly during the day. This is a big kick in the teeth for Belconnen retirees who like to venture beyond Belconnen for their socialising – does this demographic not matter? Why do we bother to pay rates?

Inclusive Communities and Centres

- Belconnen's suburban "urban open space" is just that. None of these areas can be considered as a "park" for people to enjoy being outdoors. If the proposal is to densify the suburban areas, this is a very important aspect for quality living space, and requires further consideration.
- The playgrounds in many Belconnen older suburbs have been there for decades and no child wants to go there – boring, would be their response! These small pockets of land are not maintained as a park, they either have no, or few seats, where people could gather under a shady tree, and enjoy the surrounds of a more colourful garden/parklike setting. Eucalypts do not provide shade and shed too much bark and branches - this makes them unsafe to sit under, and creates trip hazards for all. Do not plant any more eucalypts – eg, crepe myrtles and agapanthus are good colour.
- Hawker Group Centre, eg, as a meeting place, appears to receive no maintenance to keep it clean and orderly from City Services (cigarette butts and bird droppings forever in the seated gazebo) – it is quite dirty in the public spaces. This is no doubt the same in many of our Local and Group Centres.
- Belconnen needs some decent restaurant strips, we have none – eg, like what is at Dickson or Erindale. For the district with the biggest population it is very poor in this regard – there are mainly "junk" food outlets.
- Belconnen needs some areas with colour and artwork – it is a very "beige/brown/gumtree green" landscape, which needs brightening up. Why do people like Floriade – it's colour!
- Once again do not omit the retiree demographic when planning suburban areas – find out more about their needs and desires, and their expertise and knowledge.

Having spent time in Melbourne this month, where the public spaces are maintained for the community, it is discouraging to return to Canberra to see the suburban areas in such a poor state.

Future Investigation Areas

The Draft Plan shows quite a bit of this Investigation Area, especially through Scullin. There is no explanation as to what is really being "investigated". As our house sits in the centre of this yellow zone, we would like to know please?

PROPOSED TERRITORY PLAN

DA'S AND DUAL OCCUPANCY DEVELOPMENTS

As per the Asbestos Buyback Scheme, there would be many large blocks in the Belconnen suburbs, which could accommodate a dual occupancy. Most of the asbestos blocks where a dual occupancy has been created, have sited both dwellings with a street frontage. This is far preferable than another dwelling built in a backyard.

However, there has been dual occupancies created in Macquarie, where the back fence of the block is adjacent to the reserve path which goes from Belconnen Way up the hill and continues to William Hovell. Some of the secondary dwellings have been oriented facing the reserve – even though their driveway is off the street. There are many blocks backing onto Kingsford Smith & Southern Cross Drs in Higgins where blocks are very large – all have large empty backyards, which could accommodate another residence also, without the appearance of congestion.

An example of an RZ2 zone which hasn't worked well, is in Adair Street in Scullin (where we live). We are aware how these zones were identified over 20 years ago – by drawing a circle in each suburb around the Local Centre, thus identifying the blocks suitable for dual occupancy. Unfortunately, this decision did not appear to consider the number of battle-axe blocks on this street. It is "C" shaped, with nine houses on the inside curve and 25 houses on the outside curve, seven of which are battle-axe. These blocks have a driveway width of street frontage and nowhere to place the garbage bins with neighbours' gardens planted to road edge.

An issue was created with two houses (No 2 & 4 Adair St) demolished, and 10 units were constructed - five on the ground floor and five on top. There were two three-bedroom (which had an allowance of two parking spaces each in the carpark below the building). The other eight are all 2 bedroom – with an allowance of only 1½ carparks each allocated. It would appear they are all rented. This construction has created ongoing issues in the street for existing residents with these tenants parking on both sides of the street.

In about 2008/9 the residents in the area got together to protest the development which was very inconsistent with the original proposal put forward to people in the area. One issue we highlighted strongly, is that the number of parking spaces provided, would not be adequate, plus tenants coming and going during the day, would not be bothered by using the underground parking on each occasion, and chose to park on the street. At the time, we were advised that this was not an ACT Planning issue, and that the existing residents would need to take it up with City Services. This was a huge "cop-out" by ACT Planning, as during the DA process City Services should have been consulted about traffic management.

We suggest, it is about time the "silos" between Directorates are knocked down, to make way for improved consultation within ACT Government, to ensure the best outcome for the community.

Since construction, the residents in the street are still having trouble on garbage collection days, and to simply negotiate between the vehicles on both sides of the road outside these units to access our own properties. Many of the tenants park opposite other people's driveways making access very difficult. At present there appears to be two tenants who own small furniture delivery vans which park in front of the units. Many of the bins sit on the road edge permanently also, and are often not emptied as tenants park in front of them on bin collection days and they stink.

The body corporate is silent on these issues and has been no help. We are still waiting to see if City Services are going to take proper action to have this problem fixed. Haven't seen any action or improved behaviours yet!

Photos on the street in front of the units block on the right in photo 1&3, and on the left in photo 2



With the identification of blocks suitable for the RZ2 zones, by using a circle on the suburban map around the Scullin Local Centre, has not been successful for this street. There is

currently now a total of 42 residential dwellings in a very narrow street with two blind corners at both curves in the street! Another DA was approved last year for a dual occupancy so that makes 43 dwellings in total.

There are signs in the street that we are likely to see two further blocks with DA Notices out front fairly soon. We, and others in the street believe It will become quite a ghetto!

We suggest that proper consideration be given to any DA where proposals are submitted in circumstances such as Adair St. This is vital, especially if the ACT Government is liable for the fact that the Fire Truck or Ambulance cannot access the street. As said earlier, Scullin has very few streets with footpaths and the streets are the only place to walk!

In the past several years there has been both dual occupancy and multi-unit developments on Belconnen Way. One currently under construction is just east of Springvale Dr for about 8-10 units. This stretch of road between Page/Scullin and Hawker/Weetangera sees quite a bit of traffic. Not sure how the vehicle access in and out of this current development is expected to work. This stretch of road cannot cope with this type of development.

DEVELOPMENT APPLICATION NOTIFICATION SIGNS

We have noted in the Belconnen area there appears to be an inconsistent approach for these signs and where they should be placed. Recent examples include:

- DA to demolish the old Kippax Health Centre and Public Toilets behind the Kippax Centre – this notice was placed at the southern edge of the playing fields. Most people would have wondered what building was proposed for demolition, as there were none in the vicinity of the site of the DA Notice. We add that as the DA was fairly simple, it was full of errors as the DA Assessment Officer just did a cut and paste from a previous DA – without doing a final check!
- DA at Florey Shops to construct a restaurant. Being familiar with DA Notices, we frequent this area often, and don't recall ever seeing a DA Notice. This could well explain why there were no representations made on it – even though the Minister assured us there had been a notice!!
- DA to construction the apartments at the Belconnen Fresh Food Markets – the address of this block is Ibbott Lane – why were two notices place on Benjamin Way, and none placed at the actual entrance to the block on Ibbott Lane. As a result, very few people we know who have frequented the Markets for years, were aware that such a proposal was made.

There are issues still outstanding as far as we are concerned, as the proposal makes available a total of 582 vehicle parking spaces within this complex. The traffic in this area is already at its limit, with plenty of congestion now. We are certainly not convinced that another 582 vehicles in the mix will work.

This is especially so, given that the neighbouring Hotel is also proposed for demolition to build apartments – and no doubt will allow for another 200-300 more vehicles also.

- Block 3, Section 53 Holt (Kippax) – this site was sold for over \$4m with the caveat to construct 30 residences on site. How can it be possible for this developer to put to the community a proposal for “76” residences. ACT Planning need to intervene to put a stop to greedy developers as is the case here.
- The DA Decisions are not very explanatory with words, and there appears to be no consistency with the approach to decision-making. All this requires much improvement, for best outcome.

NEW CONSTRUCTION PHASE

The stage following DA Approval needs to be more scrutinised by City Services, or whoever deals with the Building Approvals. We have seen too many developments (Mr Fluffy blocks and other knock downs and re-builds) where construction vehicles are parked across footpaths and many constructions workers take no care in minimising any disruption to the people in the area. They leave rubbish around the site and damage neighbours' property.

PART D2: BELCONNEN DISTRICT POLICY CONSULTATION DRAFT FOR COMMENT

1.2 Land and use table

On page 6, what is the meaning of –

Scullin	CFZ	Nil	retirement village; supportive housing	B1/S13 B22,24,27,28/S43
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Block 1 Section 13 is currently Southern Cross School. The original Scullin Primary School was built in a configuration that could be converted to a retirement village when a school was no longer required. The fact that it stipulates a “retirement village” under Additional prohibited development, is not clear. Does this mean it can still be a retirement village providing there is additional development on site?

Blocks 22,24,27& 28 of Section 43 suggests something similar. Given that these blocks were allocated to an organisation to provide community housing about three years ago, is this likely to ever come to fruition? At the moment, the grass on this site has not been mown since (requesting this has fallen on deaf ears in ACT Government) the old temporary Scullin Health Centre was demolished.

This paper appears to say nothing. What is its role?


CONCLUSION

This document is very complex and vast for those in the community. It would appear to ensure that only the specialised professions comments, are required. There are still huge questions on the ongoing poor planning in Belconnen District.

Since moving to Belconnen in 1969, there has been plenty of promises to right the original oversights, with no action from firstly the Federal Government and since various ACT Governments. We are still walking on roads to get out of the suburb, and being told we must use “active travel”, which we have no problem with, but it would be good to have something to walk on!

Breaking down the internal walls of ACT Government silos would be a good starting place. Suggestions like “this is beyond the scope of this project” needs to stop and look at the broader issues beyond, for a best outcome for the community.


31 January 2023


Resident of ACT

Draft District Strategies & New Territory Plan Submission

To whom it may concern,

I am writing today to add a submission to the new draft ACT Territory Plan & draft District Strategies.

When reading through your plan, I admire the intent & proactiveness of the plan & strategy. However I believe that these documents are missing one important aspect of housing & planning that should be considered a fundamental part of these documents.

I propose that the new territory plan & strategy include the long term use of “portable tiny dwellings” or “tiny houses on wheels” as they are popularly called. These structures are not caravans or RVs, but are portable houses that are designed to not only look like a house, they also function as a house, designed to be permanent dwellings.

These structures can be registered for the road & towed by a vehicle. They are safe & include all the necessities homes need, such as a kitchen, bathroom, bedroom/loft, laundry, living area etc. As well as heating, cooling, connection to electricity or solar, water & gas (if designed to include gas appliances), it's just built into a smaller space.

This form of dwelling is important in the mix of housing that I am proposing the ACT adopt. Tiny houses on wheels are an environmentally friendly form of housing & many people around the country choose to live in them long term, despite all jurisdictions of Australia not modernising existing laws, regulations & zoning to legally accommodate this form of housing as a long term dwelling.

Tiny houses are built with high quality materials & to very high standards. Why many people want to live in tiny houses is for a number of reasons. Some include: ability to travel with your house, lower environmental footprint, to have a minimalist lifestyle, spend less time maintaining your house, more time outdoors, spend less on utilities, save money on housing costs & highly efficient spaces.

In stating the above, I would like to propose the ACT Government include in its plan & strategy, provision to allow “Tiny House Pocket Neighbourhoods” in appropriate zones throughout the ACT & that Tiny Houses be allowed on appropriate sized residential properties as a long term secondary dwelling.

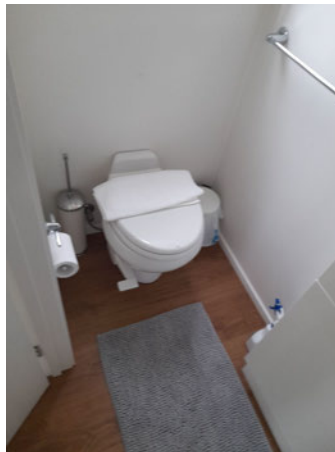
Tiny houses will also need to be legalised for use as a long term/permanent dwelling & have appropriate checks & certifications to ensure that safety & living standards (appropriate to a tiny house) are met.

In conclusion, if this is adopted in the ACT plan & strategy, this will go a long way to improving housing affordability, meeting our territory's emissions target & supporting Canberrans who want to live in a Tiny House on Wheels.

Below is some important Tiny House information I would like to include in this submission:

- Examples of Tiny Houses on Wheels being legalised/adopted in planning & zoning:
City of Rockledge, FL, USA, pocket tiny house communities:
<https://americantinyhouseassociation.org/model-zoning-for-tiny-houses-from-rockledge-fl/>
Fresno City Council, CA, USA, second dwelling unit tiny houses on residential properties:
<https://www.fresno.gov/darm/wp-content/uploads/sites/10/2018/01/Tiny-Homes-submittal-requirements.pdf>
- Documentary about the above USA councils, legalising tiny houses with further information: <https://www.youtube.com/watch?v=ZfLAKgJGc2g>
- Australian Businesses that Build Tiny Houses on Wheels:
Tiny House by Hangan, Warburton VIC.
Tiny Houses SEQ, Gold Coast QLD.
Aussie Tiny Houses, Coolumb Beach QLD.
Hauslein Tiny House Co, Port Macquarie NSW.
- Tiny House Representative Body:
Australian Tiny House Association: <https://tinyhouse.org.au/>
- Local Governments who have provided information about Tiny Houses on their websites:
Port Macquarie Hastings Council:
<https://www.pmhc.nsw.gov.au/Plan-Build/Other-requirements/Tiny-homes>
Coffs Harbour City Council:
<https://www.coffsharbour.nsw.gov.au/files/sharedassets/public/building-and-planning/development-approvals/fact-sheets/fact-sheet-tiny-houses.pdf>
Cairns Regional Council:
https://www.cairns.qld.gov.au/data/assets/pdf_file/0013/302071/Tiny-House-Fact-Sheet.pdf
- Tiny House Charity:
Tiny Homes Foundation: <https://www.tinyhomesfoundation.org.au>

- Photos of a Tiny House on wheels I stayed in to illustrate what these structures look like & how they function as a house:



Thank you for taking the time to consider my submission & I am happy to elaborate on this further with the Government & arrange a meeting if needed.

Best of luck with this draft plan & strategy.

Kind regards,


ACT Resident.

Draft new Territory Plan/ Draft District Strategies

- Key areas of concern

General comment

The model underpinning the new planning proposals appear to be based on ongoing growth and density with no option for individual residents to negotiate within this system and limited access to third party appeal rights.

Need to reassure communities that the new planning framework will not impede appeal rights of existing residents.

Specific comments

Vista: Developments of up to six levels and beyond will severely impact the uninterrupted vista to landscapes to the east with Oakey Hill and Mt Taylor and views to the Brindabellas Mountains to the west.

Need to reassure communities that existing residents will have the right to appeal any development proposal that significantly impacts vistas.

Traffic: Proposed infill areas in Holder would generate significant additional traffic movements down Blackwood Terrace, Williamson Street and Mulley Street and would focus that traffic through school zones along Mulley Street. This would impact school zones and result in higher risks for children and their carers.

There is some community scepticism of the statement in the draft planning documentation that 'current traffic growth will need to shift to other more sustainable transport modes including active travel. Transport infrastructure projects will need to prioritise model shifts and enhance connectivity, road user safety and amenity'.

There is an apparent lack of priority currently given to road and traffic safety risks arising from a lack of policing of irresponsible and dangerous behaviour by some road users. Risks to public safety will only increase with growth in active travel modes of transport.

Bushfire prone areas/ asset protection: These areas are not adequately addressed by blue-green mapping or proposed risk mitigation measures.

Urban heat: Provisions in the draft strategy are insufficient to address urban heat. Need to incorporate Urban Heat Island (UHI) effects of infill and increase in population density into draft new planning documentation.

Sustainable neighbourhoods: Map shown in Fig 36 is not supported and should not have been released. It is understood that this map was prepared by Sydney consultants without any on-ground understanding of current neighbourhood issues or impacts of proposed changes to density and building heights, or consultations with potentially affected individual landholders. Any changes would impact privacy, solar access, visual amenity and the character of Holder and other suburbs.

Need for planning change: The case for a change to the plan to allow for greater density housing and infill in Holder/ Weston Creek has not been made. It is estimated that only 800 additional dwellings are required for Weston Creek to 2046 and only 1300 additional dwellings are required to

2063. Need to assess extent to which future housing needs can be met by changes from RZ1 to RZ2 zoning, for example.

Blue-green mapping: This concept requires greater explanation on its application in a revised planning model for the ACT to achieve effective community engagement. There are many community groups, including the Holder Community Landcare Group which are gradually increasing their knowledge and application of hydrology and ecology in a residential environment. Local communities have an important role to play in this area.

The Government should note the strength, and potential, of volunteer groups in helping to enhance blue-green networks. Effective government support for these volunteer groups is essential to maintaining this network.

Climate change: Government policy is for a minimum requirement of 30% tree canopy cover to deal with increasing urban temperatures. What are the plans for adoption of this strategy and what roles may communities play eg through Landcare groups, friend of the park initiatives, etc?

Demographics: These should be considered in terms of age profiles, aged care and disability needs, etc in any considered changes to ACT planning and development of district strategies.

Effective inclusion of community into planning considerations

The new territory planning proposals are complex and difficult to understand through the broad presentational approach current being progressed by the government. The current community engagement initiatives are restricted to working days, and the 'your say' portal is inadequate

Joint Government/ community consultative committees have worked well in the past for progressing planning changes/ proposed development. The most recent example is the Government Task Force/ Holder Community Action Group Consultative Committee relating to public housing off Stapylton Street in Holder. This initiative by the government resulted in a positive outcome for the government, existing community and new public housing residents.

It is suggested that a more effective approach would be to establish a core set of principles eg need for planning changes to meet future population growth, etc and set up a series of district consultative committees comprising government, community and relevant expertise to work through, and seek consensus on, the various issues.

[REDACTED]

[REDACTED]

Holder ACT 2611

[REDACTED]

[REDACTED]

From: [REDACTED]
To: [FPSDD Communications](#)
Subject: Dual occupancy developments feedback
Date: Tuesday, 7 February 2023 4:08:06 PM

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

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

[Learn why this is important](#)

Hi

I wasn't sure where to direct my feedback about dual occupancy developments. There is a request for feedback on the yoursay website but no online form.

I am supportive of more family homes being built in the suburbs in RZ1 areas.

In my area, many of the blocks, including my own are in excess of 1000m². Subdivision of our block would still result in block sizes that are very large.

They are difficult to maintain, and busy families, like ours, and elderly people, like my neighbour, find it difficult and expensive to maintain such large blocks. Additionally, people may like to age in their neighbourhood, and the lack of diversity of housing makes this hard as they either have to stay in a family home or move out of the neighbourhood.

Our land value has increased significantly which means that rates are increasing significantly. Combined with a large mortgages with increasing interest rates there is significant financial pressure. Enabling subdivision would alleviate financial pressures and potentially remove some of the barriers to home ownership, as smaller blocks would be more affordable.

There are significant advantages to allowing subdivision over dual occupancy on the same title. Banks are hesitant to loan for dual occupancy without a separate title. Additionally, I would prefer to not be a landlord on my own property and would prefer to subdivide and sell.

Some properties in my area were allowed to subdivide in times past and our street has greatly benefited from this - there are more families and some of these properties are more affordable. Having greater density increases community and social capital and has a huge array of benefits (like making public transport more cost effective).

With regards to protections and provisions, I live in an area that I view as having low heritage value (mostly ex govies). I can see that in some RZ1 areas with higher quality housing and character homes some provisions to protect these homes and the character of the neighbourhood may be worthwhile but I still think increased density can occur whilst preserving street frontages and the neighbourhood character.

In my opinion, all areas within Canberra should have accessible public transport and access to amenities, so I don't think it is necessary to apply restrictions to where subdivisions can occur. This is a chicken and the egg issue!

Regards,

[REDACTED]

PROPOSED REROUTING OF GARRAN SCHOOL TRAFFIC

The owners of residential property in lower Garran, have received information regarding the Garran Primary School expansion and an associated proposed car park with entry and exit off Robson St, Garran.

It is conservatively estimated that the car park will generate an additional 400 vehicle movements per day, feeding into narrow suburban Robson Street already struggling to cope with traffic.

Many of the residents living in Robson St and its cul-de-sacs are been there long-term - some for as many as 50 years. Some have chosen to build their retirement home in the precinct whilst others have recently been granted approval to construct their retirement home in the area.

In November 2022, Robson St property owners were informed by mail that Robson St is earmarked for re-routing of traffic from surrounding arterial roads. Government has however failed to inform owners in the cul-de-sacs off Robson St and also the owners on Robson St east of Stephens Place, causing un-necessary alarm. Robson St already carries heavy traffic in the form of both cars and trucks from:

- a shopping centre
- a primary care medical centre
- a pharmacy
- a specialist medical centre
- a church
- an aged care facility
- the Garran Preschool
- a Scout Hall
- the COVID Testing Centre at the Canberra Hospital
- a rat run for cars and trucks from upper Garran and from Fyshwick to the Woden area.

Older residents of the locality in question, talk of a public forum around 10 years ago involving residents and local government officials, regarding a car park on the same site, having entrance onto Robson St. The unanimous decision at the time was that Robson St around 2012 was already too busy to cope with additional traffic, without seriously affecting the daily lives, the mental health and the safety of those living in the vicinity.

Clearly there are more appropriate town-planning alternatives to the proposed car park entry point on Robson St.

- 1) The Garran Primary car park to be accessed from Kitchener St, a wider street, designed to handle heavier traffic flow.
- 2) Restructure of Robson St so that traffic flows in one direction only in the street.
- 3) Place a bollard at the end of the street, which can only be operated by folk living in Robson St and its off-shoots. This is the current European solution to an over-use issue on suburban roads.

4) Additionally, the western end of Robson St needs dual footpaths - one on each side of the road - for safety when a large truck is passing a parked car and one has to quick jump off the road onto a lawn.

There is a ground swell of resident opposition to the proposed car park entry/ exit into Robson St, as at peak times:

residents will find it difficult to exit their properties to get to work on time
backing a vehicle out of a garage onto Robson will be dangerous, very anxiety provoking and time-consuming
elderly residents trying to cross Robson St with wheelie-walkers will be in jeopardy
children returning from school will be at risk crossing busy Robson St
disabled elderly needing to cross Robson St to attend a doctor, a pharmacy or to go to the shops, will be in peril.

There is no support from residents of the area for such an ill-conceived proposal. Many residents are angry that they have not been consulted by government and others are angry that they have not even been informed of such a proposal.

The options cited above would allow the Garran residents to continue to live in a less polluted, less noisy, less congested, less hazardous suburb where a fatal accident is waiting to happen. Their quiet enjoyment of their homes could continue and their properties values will be maintained. The residents of Garran demand a win-win situation, as it is they who have to negotiate narrow Robson St every day.

██████████

Australian is in the midst of an affordability crisis, with Canberra being the most expensive city in Australia to rent. We need more housing options for single parents, people on low incomes and people with special community needs.

- Traditional home ownership is not accessible to all.
- Not everyone has a rich parents to pass on intergenerational wealth
- Not every job is well paid, but all jobs are important
- Rent prices and the cost of living make it nearly impossible to save for a deposit. Even then, the borrowing capacity is unviable in the Canberra market.

I'm a single parent who wants to be able to own her own home. My best option would be to build a tiny home to live within my means and live sustainably. To make this happen, I want:

- For the ACT Government to take a national leadership role in making tiny houses a viable housing alternative in the most unaffordable city in Australia.
- For the ACT Government to pilot long-term tiny home villages for people to park their home and still have access to transport, employment and services. This would allow people on a low income to live within their means and secure their financial future for retirement. Personally, I want to have a tiny home in a school district and reasonably close to Woden for work. Having tiny houses situated on rural properties is not ideal with the cost of transport being so high and low income earners typically working long hours, making them time poor.
- Tiny houses to be accepted and recognised as a realistic and affordable solution for residents of the ACT.
- For tiny houses to be legitimized by local laws and planning regulations. This includes recognition in building legislation that moveable tiny houses are dwellings suitable for permanent occupation. Moveable tiny houses are not covered under regulations and are not a recreational vehicle like a caravan, yet may be connected to a trailer. If they are not connected to the ground then they are not a typical house for the purposes of existing laws. Moveable tiny houses are not defined or recognised in any legislation or regulations that I am aware of.
- For tiny houses to be recognised as sustainable solutions to the climate crisis, with households downsizing their consumption and carbon footprint by living in smaller spaces.
- For people with tiny houses to be afforded more security and protection from being moved on, instructed to dismantle or being asked to vacate.

There are lots and lots of builders all around Australia supplying quality tiny homes. They are affordable and customisable. They can even be made to fit specific planning regulations around their visual appeal like normal homes. What's needed though, is somewhere we can put them without it being an illegal or off-the-books operation.

We're just asking for an opportunity to live within our means, with dignity and security.

Thank you,



ACT New Draft Territory Plan

Feedback

Failure to address improving road safety outcomes.

The Draft Plan and associated Strategies omit any reference to the ACT Road Safety Strategy 2020-2025 and Action Plan 2020-2023. There is a small reference to "reducing car dependence and more active transport". The reality is that irrespective of these apparently worthy suggestions there will be in total more car use, increased delivery and services vehicle transport (vans and trucks), more infrastructure support vehicles (Utes and trucks), even more buses, with the increased population.

The ACT Road Safety Strategy states; " The ACT Government will work together to identify how education, land use and transport planning, road safety and transport regulation, health, justice, industry and community sectors can leverage what they do now to improve road safety".

The plan must have a direct link to the Road Safety Strategy. The Strategy is clear; “..the ACT Government’s commitment to Vision Zero. Deaths and serious injuries on our roads are preventable”.

The Draft Territory Plan is seriously diminished by this omission.

[REDACTED]
[REDACTED]

17/2/2023

Submission to ACT Planning System Review – proposed Territory Plan

Subject: The Social Inequality of Outcomes-Based Objectives

Introduction: The review of the ACT Territory Plan has provided significant opportunity for comment but the willingness of the government to listen to comments will determine how it will be judged by residents at the ballot box.

The preamble outlines how the new Territory Plan must, “Facilitate growth without compromising the characteristics of the city” and mentions the need to do so without material detrimental impacts on residents and neighbours – valuation, saleability, and amenity. The reality is that even the higher density options permitted under the existing Territory Plan have impacted significantly on neighbours and at times without achieving higher density living. The two images indicate knock down and rebuilds of single dwellings which have impacted significantly on neighbours by virtue of their incongruous scale and design.



Impact on Residents of Outcomes-Based Objectives: Outcomes Based Objectives are more difficult to define as they leave more scope for interpretation, leading to more potential conflict, requiring resolution via discussion, mediation through ACAT or resolution via the Supreme Court. This can be costly and traumatic for residents and more so for residents experiencing particular life issues like cancer, bereavement, disability and the like. Where the Territory Plan does not clearly resolve an issue, the obligation shifts to the resident/neighbour and the developer using legal processes to resolve the issue(s). Herein lies the social inequity as the parties are clearly mismatched.

Implications for developers, residents and government: The developer would normally maximise their return on their asset. The resident would attempt to preserve the value of their asset generally without the opportunity to increase its value and without the opportunity to offset their costs. The developer and the resident are fundamentally unbalanced in their situations and resources.

Developers have financial resources and may be national or international corporate operators. They have knowledge and experience and may have been through similar exercises multiple times. They have regular access to legal and planning experts and would have established contacts within government and planning agencies. Their costs in bringing the project to completion are tax deductible.

Residents may have no knowledge or experience of planning and development issues, no contact with consultants and engineers. They would be otherwise focussed on their careers and responsibilities and would have to tackle the challenge of defending their rights in their spare time. They may at any particular time, perhaps a critical 20-day response window, be suffering from illness, disability or later life, be deployed overseas or be employed in demanding jobs that require their full attention. They may be widowed or suffering financial hardship. Any costs they incur in resolving a planning dispute are 'after tax' and may be taken from fixed income. Their situation may be very different from that of the developers, and they are likely to be unequally matched in court.

The government on the other hand should be representing the interests of all the community and providing a rules-based structure which can be applied consistently across all developments. When conflict resolution is determined by the 'roulette' of the resident's resources, outcomes will be different case-by-case and over time provide a chaos-based system. The government has an obligation to represent the interests of the residents permitting normal 'enjoyment' of their lease. The government have the knowledge, experience, and resources to match those of the developers and generate consistency in outcomes. The parties are more equally matched and the outcome more likely to be fair and equitable.

██████████
██████████

Red Hill, ACT 2603

Submission by [REDACTED] on the ACT Government's New Planning Framework - with particular reference to The Inner South District Strategy for the suburbs of Yarralumla and Deakin

"It's the Vibe"

More Time Needed: There has not been sufficient time given to the residents of Yarralumla on the impact of this Framework, and to address their concerns. These documents are hundreds of pages long, and very complex to understand.

Access and Equity to understand, and respond to the New Planning Framework: Many residents here are not that internet savvy, and do not have access to the systems to write a detailed response. Many residents come from backgrounds other than English language, and many are also older. I have yet, personally to find one resident in Yarralumla who is not very concerned however, when presented with even partial facts of what the ACT Government's New Planning Framework will have on them, their families and their homes. The ACT Government needs to recognise all people who live and who are going to be severely impacted (I think that losing your home would bother most folks - and that's what we are talking about) and ensure that they are all properly consulted. Putting up thousands of complex documents onto an internet site, does not constitute consultation.

The New Planning Framework does not respect heritage, environment and culture: Many people (my husband and his family included), have lived in Yarralumla for generations. Yarralumla is an oasis for nature, including for example we had 6 Gang-gang cockatoos in our own front yard one morning the other month (happy to send you the photos), not to mention a constant plethora of other native birds which know us (yes - actually they do recognise people), and appreciate us. Yarralumla residents care for each other. We have space to plant trees, grow vegetables, keep pets, and even some farm animals. We have neighbors who have had sheep, chickens and even a cow. We do not want, and have never wanted 'urban infill'. We are able to walk between Yarralumla and Deakin now, because there is a road that runs underneath Adelaide Avenue. Currently, Yarralumla residents are people who know each other, work in the area, and care for each other. We grow and share foods that we grow. We don't want to live in a flat, we have gardens, workshops and pets - we appreciate our little community. We love our Golden Sun Moths. We love our giant gum trees, and we love our schools - Yarralumla School, and Canberra Girls Grammar School. Your plan will destroy homes that have existed for over 70 years, and replace them with flats that will likely display their inadequacy within weeks - modern cement has a lifetime of 20 years only, and your plan will destroy a wonderful and caring school (Canberra Girls Grammar School, primary school and early learning centre), that gives the joy of music, sport and life to so many young people in our area. It will bring heartache to many, when you destroy the homes that their family's built and have lived in for generations. Your plans are chasing out folks who live in government housing, and families who have lived here for generations. Your framework does not explain how you intend to preserve, and protect, and reflect the needs of people who will be impacted by your change, with instead a vague

'outcome' - which seems to indicate, that the once the damage is done, you access your errors, rather than ensuring optimal outcome.

Your plan is not future proof, and fails to recognise change, and does not include views of people outside of a small group of interested parties: The ACT Government's New Planning Framework works only for a group of engineers, and land developers. These are the same engineers, who admitted to my daughter this week, that their lack of diversity had meant that crossing on the tramline, can not be done by people with prams, and that they are working on changing this, and hope that one day they might have '30% female staff'..... This says it all. Totally lacking in understanding of others, and no vision for the future. You have already imagined a future of nearly 1,000,000 to be crushed into a small wedge, hopping on your trams, and working like mice in offices. This is so 1980s. Times have well and truly changed. People do not want to live like that any more. More of us are working from home, part time or full time. My university degree was done through University of Armidale - via distance education. The only time I attended was to receive my degree. Many more will never work in offices or shopping malls. We are running small businesses from home, and we love it. Crushing people into tiny units is a cruel and unnatural way for humans to live. It creates societies that do not understand nor love nature. My child has been able to appreciate nature, right here in her garden, regularly seeing everything from gorgeous kangaroos hopping down the road, to our wonderful native birds. In addition, our family has been able to live in a multigenerational way - something that would be impossible in a small set of units. Forcing people to live next to the highway won't force people into your tram anyway. Many more people for example, are working at the airport, and there will likely be a lot more offices in fact there are plans for 20,000 - so how will the tram help them? I am sure that electric buses, that actually go to where people live and work, would not only be cheaper, they would be more environmentally friendly. You couch the tram in words to make it sound like you are saving the environment - when nothing could be further from the truth.

Affordability: Costs have escalated since your original plan was generated. It is unlikely that the ACT Government (and the rest of us), will ever be able to afford to pay off your plan. It is likely that you intend on jacking up the rates to an unaffordable amount - they are barely affordable now, and yet I defy you to find any in the whole of Australia that are as high as this. There is one lovely lady that I regularly see on my walks, and is known as the 'pool mum' (as she also works at the swimming pool at Canberra Girls Grammar School). She is in her 80s and forced to continue working, as you jack up the rates, to try and chase her out of the suburb. She has spirit and continues to work. It is simply wicked the way the Territory Plan tramples on the weak, the poor and the elderly. The current plan will also send the Territory into financial ruin, and black hole - spending on overseas imports will escalate the current account deficit, and increase inflation - in fact to the detriment of the Australian Nation. This is at a time when the Federal Treasury has increased interest rates to try and stop inflation. The Territory plan is wholly focussed on the good of developers, not the good of the citizens, and is at best amoral, and totally unsustainable.

SUBMISSION BY [REDACTED] – SUMMARY:

1. The **DRAFT DISTRICT STRATEGY: INNER SOUTH 2022** does not “*protect significant aspects of the local natural and built environment*” or “*guide the delivery of key infrastructure for the benefit of the local communities*” [Planning Institute of Australia ‘NSW Policy Statement July 2012 Local Strategic Planning’]. It is mostly about delivering the Government’s development agenda. Much of the document doesn’t apply directly to the Inner South, or its community. There is only ONE PAGE (p.91) that gives a summary of “**What the community has told us**” – based on the single, poorly managed ‘consultation’ workshop held in Inner South in 2021.
2. The Inner South Canberra Community Council’s **INNER SOUTH CANBERRA DISTRICT PLANNING STRATEGY – FUTURE DIRECTIONS FOR OUR DISTRICT – 2021** is a much more comprehensive, locally-sensitive, attempt at a District Strategy. **This should form the basis for a totally revised** government DISTRICT STRATEGY for the INNER SOUTH.
3. The ‘Development Assessment Forum’ (DAF)’s ‘**A Leading Practice Model for Development Assessment in Australia**’, was a nationally agreed benchmark document. It remains the ‘state of the art’ for development assessment systems. Under this Model there are ten ‘*leading practices*’ that a development assessment system should exhibit. The **current ACT planning system** tried to follow these as closely as possible. The **proposed system departs radically** from these agreed ‘*leading practices*’, **without any apparent justification or logic. It should be abandoned and any existing problems identified, evaluated and fixed!**
4. The **DRAFT TERRITORY PLAN 2022** seems to be curiously complex, voluminous and potentially difficult to apply and administer. It seems to carry over much of the current planning controls (including some that could be improved) but mixes everything up in a new and very difficult to navigate format. It separates the current assessment ‘criteria’ from the associated (generally non-mandatory) ‘rules’, most of which are relegated to ‘**supporting material**’ which presumably the planning authority would be able to change at will and without external input or scrutiny. This ‘*supporting material*’ would have questionable legal status and would inevitably generate **more confusion, conflict and uncertainty of outcomes**.
5. The extraordinary proliferation of ‘**outcomes**’ statements in the Draft Plan is also likely to produce **confusion, conflict, and uncertainty** because of the difficulty of assessing compliance with these rather vaguely worded ‘outcomes’, many of which are not actually expressed as ‘outcomes’ but rather as matters for consideration.

For detailed discussion of these points, see as follows.

LOCAL [OR DISTRICT] STRATEGIC PLANNING

The Planning Institute of Australia (NSW Division) says:

“the goals of local strategic planning are to protect significant aspects of the local natural and built environment, guide the efficient and effective use and distribution of scarce resources at a local level and also guide the delivery of key infrastructure for the benefit of the local communities” [‘NSW Policy Statement July 2012’- Local Strategic Planning]

The planning authority’s *DRAFT DISTRICT STRATEGY: INNER SOUTH 2022* fails to meet those goals. It seems to be mostly about delivering the Government’s development agenda.

In examining this 156 page, rather superficial, document I note that:

- Apart from the 5 page ‘District Strategy summary – Inner South’ towards the front of the document, it’s only from page 85 where there are specific maps and discussion actually about the Inner South District.
- There is only ONE PAGE (p.91) that gives a summary of “**What the community has told us**” – based on the single, poorly managed ‘consultation’ workshop held in Inner South in mid-2021.
- The ‘**Key directions**’ (p. 92), – 9 short, rather vague statements, do not appear to respond to “**What the community has told us**”. Rather, they are about delivering new development at East Lake, employment at Fyshwick and west Deakin, light rail from City to Woden, a “multimodal hub around Canberra Railway Station”, and “a mix of housing types”.
- Only the first ‘**Key direction**’: “Stengthen the blue-green network” and the last: “Deliver new community infrastructure to meet district demand for facilities” may be seen as some response to local community concerns.
- These ‘Key directions’ are elaborated to some extent in Tables 11-14: ‘*Inner South Initiatives*’. Many of these ‘*Initiatives*’ (particularly ones which may provide some community benefits) are noted as ‘Ongoing’, or ‘Medium term’ to ‘Long term’.

From *Figure 31: Inner South District Strategy Plan* I note:

- ‘Blue-Green Network’ – the only ‘new’ connections appear to be around the northern edge of Fyshwick and in south Narrabundah.
- ‘Strategic Movement’ - no ‘Proposed Rapid Bus Corridors’ and a very vaguely defined ‘Strategic Investigation Corridor’ along the existing railway line through Fyshwick to Kingston, then along Wentworth Avenue, Brisbane Avenue, Adelaide Avenue.
- ‘Sustainable Neighbourhoods’ - ‘Future Investigation Areas’ in yellow, around Red Hill and Narrabundah shops, Griffith shops to Kingston shops, Adelaide Avenue; and ‘Key Sites and Change Areas’ – central Fyshwick, East Lake, Adelaide Avenue, west Deakin, west Yarralumla. Figure 36 elaborates this somewhat as three ‘Urban Character’ areas, but there is no description of these in the text.

Contrast these vague suggestions with the ISCCC’s *Inner South Canberra District Planning Strategy – FUTURE DIRECTIONS FOR OUR DISTRICT – 2021*. 84 specific ‘Actions’ related to the five ‘THEMES’ from the ACT Planning Strategy 2018 plus a further 12 ‘Actions under the special Theme of ‘Heritage’.

LEADING PRACTICE DEVELOPMENT ASSESSMENT

In 2005 the ‘Development Assessment Forum’ (DAF) published *‘A Leading Practice Model for Development Assessment in Australia’*. DAF was established under COAG in 1998. “It brought the three spheres of government together with industry and professional associations to examine ways to speed up assessment and cut red tape, **without sacrificing the quality of decision-making or development outcomes.**”

DAF commissioned the “Draft leading practice model” report from the Centre for Developing Cities (CDC) at the University of Canberra. “This report examined existing systems in Australia, New Zealand and Singapore and proposed a leading practice model that aimed to deliver **greater consistency, simplicity and economic benefit** to stakeholders. Each element of the development assessment process was considered, ranging from pre-lodgement processes to appeals and system improvements.”

The draft model was subjected to nation-wide consultation during 2004, with the final version published in 2005. It remains the only significant widely-agreed “state of the art” model for development assessment, for application to all jurisdictions in Australia.

THE MODEL

There are ten leading practices that a development assessment system should exhibit, in summary:

1 Effective policy development	Elected representatives responsible for the development of planning policies, through effective consultation with the community [etc.]
2 Objective rules and tests	Development assessment requirements and criteria written as objective rules and tests that are clearly linked to stated policy intentions
3 improvement mechanisms	Systematic and active review of policies and objective rules and tests to ensure they remain relevant, effective, efficient and consistently applied
4 Track-based assessment [*note 1]	Development applications (DAs) should be streamed into an assessment ‘track’ that corresponds with the level of assessment required
5 A single point of assessment	Referrals should be limited only to those agencies with a statutory role relevant to the application. Referral should be for advice only.
6 Notification	Where assessment involves evaluating a proposal against competing policy objectives, third-party involvement may be provided
7 Private sector involvement	Private sector experts should have a role in development assessment, eg. in pre-lodgement certification of applications [etc]
8 Professional determination for most applications	Most DAs should be assessed and determined by professional staff or private sector experts. For those that are not, either: Option A – Local government may delegate DA determination power while retaining the ability to call-in any application for determination by council. Option B – An expert panel determines the application.
9 Applicant appeal	An applicant should be able to seek a review of a discretionary decision.
10 Third-party appeals	Opportunities for third-party appeals should not be provided where applications are wholly assessed against objective rules and tests .

*Note 1: The six development assessment tracks proposed by DAF are: • Exempt • Prohibited • Self assess • Code assess • Merit assess • Impact assess.

EVALUATION OF THE CURRENT AND PROPOSED SYSTEMS AGAINST THE DAF 'MODEL'

The existing Territory Plan and legislation is generally consistent with the DAF 'leading practices', as they were developed at the same time. **However the current 'system reform' proposals include major, and undesirable, departures from the DAF recommendations.** In regard to each recommended 'leading practice' (LP), I note as follows:

1. Effective policy development. Current Plan: YES Draft Plan: NO X

The current Territory Plan and changes thereto are subject to community input and scrutiny by the ACT Legislative Assembly (although this has been inconsistent) except for exempted 'minor' and 'technical' amendments. The Planning Strategy was not part of the Territory Plan and not subject to approval by the Assembly. **The proposed system would extend the exemptions and remove many of the 'rules' from the Territory Plan, so limiting Assembly scrutiny. Why?**

2. Objective rules and tests. Current Plan: YES Draft Plan: NO X

The current Territory Plan has 'rules' (usually not mandatory) and 'criteria' (qualitative 'tests' where proposals are not rule-compliant). This works reasonably well except where developers propose sometimes egregious departures and the planning authority often fails to rein them in, leading to disputes with the affected community. **The proposed system would abolish many of the community agreed 'rules' and replace specific criteria with vaguely worded 'outcomes' statements. This would inevitably lead to more confusion and conflict.**

3. Improvement mechanisms. Current Plan: NO X Draft Plan: NO X

This is a major failing of the current system. Concerns have arisen about poorly drafted, over-complicated rules and criteria but these have generally not been addressed. Instead **it is proposed to radically move away from the current system to even more poorly drafted, over-complicated and obscure 'outcomes' statements, to be devised and administered by the planning authority.** And yet the *ACT Planning Review and Reform Working Series Listening report 17 December 2021* identified three 'key feedback themes', which were said to be 'consistently prominent' across the four 'stakeholder' meetings:

- **"Confidence, certainty and clarity"** – *"important to both community and industry", "Clear rules and processes are preferred"*

- **"Trust and transparency"** – *"Building trust in the planning system should be a priority", "Transparency across the planning system, including decision making, was valued by all participants"*

- **"Consultation"** – *"Community consultation is an important aspect of restoring trust in planning system"*

The planning authority has ignored the outcomes of its own consultations.

4. Track-based assessment. Current Plan: YES Draft Plan: NO X

The current system has this, which can assist in tailoring development assessment processes to reflect the scale and impacts of a proposal. **The proposed system mixes everything up together and will maximise confusion.**

5. Single point of assessment. Current Plan: YES Draft Plan: YES/ NO

The idea here was to limit the number of separate approvals required for a single development proposal. **The current system does this, but the proposed system enables the planning authority to override agency advice if *"satisfied that acting contrary to the advice will significantly improve the planning outcome to be achieved."*** (Planning Bill s.187). **This must be unacceptable, particularly in respect of heritage and significant existing tree issues.**

6. Notification. Current Plan: YES Draft Plan: YES/ NO

The current system has fairly extensive 'third-party' involvement, except notably for 'knock-down, rebuilds' of single houses which is a contentious issue in the community. **There is no improvement in the proposed system, and it was proposed to abandon 'Pre-DA Community Consultation' because of complaints from industry, rather than fix any problems.**

7. Private sector involvement. Current Plan: ? Draft Plan: ?

This has generally not happened under the current system, except for outsourcing of building control with generally regrettable results and developers employing planning consultants to put the best spin on their proposals. **No improvements are proposed.**

8. Professional determination for most applications. Current Plan: ? Draft Plan: NO X

Unfortunately there are serious questions over the professionalism of the planning authority, **and yet they propose even more discretionary decision-making power to be given to them.** DAF suggests either 'call-in' powers for elected councillors or an 'expert panel' to determine contentious applications. The ACT system is crying out for independent, expert and transparent decision-making for such DAs.

9. Applicant appeals. Current Plan: YES Draft Plan: YES

Provided in the current system – **no change proposed.**

10. Third-party appeals. Current Plan: YES Draft Plan: ?

Provided in the current system but limited – **no change proposed but further restrictions could be made through regulations.**

DRAFT TERRITORY PLAN 2022

The 'new' Plan seems to be curiously complex, voluminous and potentially difficult to apply and administer.

The following 'new' Plan components are relevant to development assessment:

- **'District Policies'** - Parts D1 to D9 containing: 1. 'District map; 2. 'Land use table'; 3. 'Policy outcomes' [**Note: for Inner South there are 8 short statements which appear to come from the Draft District Strategy and are heavily weighted to delivering infrastructure for light rail, urban renewal and freight**]; 4. 'Assessment requirements' – "**mandatory development controls** for specific areas and sites" [**at least partially derived from current Precinct Codes but with very little relevant to development assessment**]; 5. 'Assessment outcomes' – 13 general 'outcomes' statements and then locality or section-specific statements [**also derived from current Precinct Codes but, again, very little relevant to development assessment**]; 6. 'Development compliance provisions' – "Where a proposed development complies with a relevant provision in the **technical specifications** and the technical specification comprehensively addresses the outcome, further assessment regarding those specific provisions will not be required." [**But Technical Specifications DO NOT FORM PART OF THE TERRITORY PLAN - see 'Supporting material' below.**]
- **'Zone Policies'** - Parts E1 to E7: same format as '**District Policies**', except 5. 'Assessment outcomes' – with various vaguely worded references to the **Urban Design Guide** or **Housing Design Guide**, eg. "**sufficient consideration**" is required.

Clause 4 (Zone Policies) says: “For new dwellings, development **is consistent with** the objectives, design criteria and design guidance within the *Housing Design Guide*.” [What does “consistent with” mean – how is it to be assessed?]

SUPPORTING MATERIAL

These “do not form part of the Territory Plan but ‘**may be called up**’ by policies within the Territory Plan” (Part B page 2) [What is their legal status?]

- ‘**District Strategies**’ – do not appear to be referred to anywhere in regard to development assessment
- ‘**Design Guides**’ - *Housing Design Guide*; *Urban Design Guide* – ‘called up’ in places (see above) [but not yet available for public scrutiny – will they ever be?]
- ‘**District Specifications**’ (DS1 to DS9 – these appear to refer to non-urban areas (with widely variable content), new development areas and specific localities such as ‘Strathnairn’, Northbourne Avenue and City. [Very hard to follow!] ‘DS9: East Canberra’ has some specific statements for **Oaks Estate** re front fences etc.)
- ‘**Technical Specifications**’ - TS1: Residential; TS2 Commercial; TS3: Industrial; TS4: Community Facilities; TS5: Parks and Recreation; TS6: Transport and Services; TS7: Non-Urban; TS8: Subdivision. The intro to TS1 says: “Where a proposed development complies with a relevant provision in the **technical specifications** and the technical specification comprehensively addresses the outcome, **further assessment regarding those specific provisions will not be required.**” [What does comprehensively addresses the outcome mean? How is this to be assessed?]
The **Technical Specifications** appear to include many of the ‘rules’ from the current Codes. **But Technical Specifications DO NOT FORM PART OF THE TERRITORY PLAN.**

If all or part of a development proposal fails to comply with a Technical Specification, presumably the development then needs to be totally assessed against the ‘District Policies’, ‘Zone Policies’ and ‘other Policies’, as well as the ‘Design Guides’ as part of this extraordinarily complex array, but not then the technical specifications, which contain most of the ‘rules’ from the current Territory Plan?

‘CASE STUDIES’ TO COMPARE THE CURRENT PLAN AND THE ‘NEW’ DRAFT PLAN

In order to try [with limited success] to understand how the Draft Territory Plan might work, I have done three CASE STUDIES based on current DAs I have recently assessed (all subject to appeals to ACAT). These are:

1. A three-unit ‘supportive housing’ development in RZ1 Zone Griffith
2. Two 4 storey apartment buildings over three blocks in RZ5 Zone Griffith
3. 4 storey commercial building in CZ2 Zone Kingston

My summary of this analysis is:

CASE STUDY #1:

The CURRENT '*Griffith Precinct Map & Code*' applies, but this is quite brief and there are no relevant controls. Under the DRAFT PLAN, you have to wade through 37 PAGES of the '*INNER SOUTH DISTRICT POLICY*' (maps and 'Land use table', 'Policy outcomes', 'Assessment requirements', 'Assessment outcomes' and 'Development compliance provisions'.) Having done all that there appears to be NOTHING relevant to this proposal.

Again, 'Development compliance provisions' states: "Where a proposed development complies with a relevant provision in the *TECHNICAL SPECIFICATIONS* and a *TECHNICAL SPECIFICATION* comprehensively addresses the outcome [which 'outcome'?], further assessment regarding those specific provisions will not be required". These TECHNICAL SPECIFICATIONS are 'SUPPORTING MATERIAL', sitting outside the Plan and apparently able to be varied at will by the planning authority. How can this possibly improve "**Confidence, certainty and clarity**" and "**Trust and transparency**"?

There are eight TECHNICAL SPECIFICATIONS. The only one relevant to this proposal appears to be TS1 RESIDENTIAL (28 PAGES). Apparently a lot of 'rules' from the CURRENT RESIDENTIAL CODES – but nothing about SOLAR ACCESS (to living rooms) or PRIVATE OPEN SPACE (minimum dimensions). **And these can be used to avoid further assessment!**

There are also DISTRICT SPECIFICATIONS [Not referred to in the Draft Plan?]. Apparently nothing relevant to this proposal, but **they can be used to avoid further assessment [eg. 'Demonstration housing' on a specific site in Forrest and the 'Manor House' in Griffith]**.

The current Residential Zone 'OBJECTIVES' have been roughly translated across into the proposed 'ZONE POLICIES – POLICY OUTCOMES'. But note that the current Zone 'Objectives' contain the wording: "predominantly single dwelling" and "Protect the character of established single dwelling housing areas". The proposed 'Policy outcomes' **omit those words. So the planning authority is surreptitiously making significant changes to zoning provisions without any specific explanation. This cannot be permissible!**

Under the current *MULTI UNIT HOUSING DEVELOPMENT CODE* the critical provisions for this proposal were: PRIVATE OPEN SPACE, PLANTING AREA, CANOPY COVER, SOLAR ACCESS and CAR PARKING (to be consistent with the *desired character*, eg. no parking in the *front zone*). The only reference to these important matters in the DRAFT PLAN appears to be under the rather vaguely worded 'ASSESSMENT OUTCOMES', which refer you to another SUPPORTING MATERIAL, the HOUSING DESIGN GUIDE, which unfortunately is not yet available for public scrutiny **[will it ever be, or will it remain some sort of internal guideline document?]**

Again, the 'development compliance provisions' contain the same references as above to *TECHNICAL SPECIFICATIONS*.

This all seems incredibly cumbersome and difficult to navigate. [What ever happened to the chief planner's boastful ambition of reducing the Territory Plan to ONE PAGE?]

Similar concerns apply in my other CASE STUDIES, notably:

CASE STUDY #2 [RZ5]:

The current ZONE OBJECTIVE “d) Ensure development and redevelopment is carefully managed so that it achieves a high standard of residential amenity [etc] is **omitted**, to be replaced by a new ‘POLICY OUTCOME’: “The fundamental desired outcome for the RZ5 zone is to facilitate development or redevelopment of sites to achieve high density housing”. **[I think this means: the more the better regardless of the consequences!]**

The following ‘ASSESSMENT OUTCOMES’ apparently apply to “all zones”.

“3. For residential development, demonstrates sufficient consideration of the applicable elements of the *Housing Design Guide*” **[What does this mean?]**

“4. For new dwellings, development is consistent with the objectives, design criteria and design guidance within the *Housing Design Guide*. **[How is ‘consistent with’ to be determined?]**

“5. The functionality and usability of the development for its intended purpose/use.” **[This is not expressed as an ‘outcome’]**

“6. Site constraints including noise, bushfire, flooding, contamination or hazardous materials.” **[Not expressed as an ‘outcome’]**

“7. Living infrastructure and planting area addresses impacts of urban heat and water infiltration.” **[What does this mean? Not an ‘outcome’]**

“8. Impacts on and connections with the natural environment.” **[Not an ‘outcome’]**

“9. Impacts of non-residential development on surrounding residential amenity.” **[Not an ‘outcome’]**

“11. Electric vehicle parking and access to charging locations.” **[Not an ‘outcome’]**

“12. End-of-trip facilities provisions.” **[Not an ‘outcome’]**

“14. Water sensitive urban design (WSUD) provisions” **[Not an ‘outcome’]**

“19. Any applicable statement of environmental effects.” **[Not an ‘outcome’]**

CASE STUDY #3 [CZ2]:

Similar questions over the wording of the ‘ASSESSMENT OUTCOMES’.

CONCLUSION

The ‘new’ Plan is likely to result in confusion, conflict, additional time and cost and recourse to law on the interpretation of relatively obscure aspects. It is unjustified and will do nothing to improve the TRUST and CONFIDENCE of its users. It should be regarded as a failed attempt at instituting radical ‘outcomes-focused’ planning, in a way not practised anywhere else in Australia to my knowledge, and instead problems in the current Plan should be identified, evaluated and fixed! Better, more expert and transparent decision-making processes are also required, eg. ‘local planning panels’.

ADDENDUM - WHY IS THE CURRENT PLANNING SYSTEM LIKE IT IS?

THE PLANNING AND DEVELOPMENT BILL 2006 'EXPLANATORY NOTES (GENERAL OUTLINE)' say:

*"The Bill is intended to make the Australian Capital Territory's (ACT's) planning system **simpler, faster and more effective**. [NOTE*1] The Bill will replace the existing Land (Planning and Environment) Act 1991 (the Land Act) and the Planning and Land Act."*

*"The most significant change under the Bill is simplified development assessment through a track system that matches the level of assessment and process to the impact of the proposed development. **As well as being simpler, more consistent, and easier to use, this system is a move towards national leading practice in development assessment.**" [NOTE*2]*

"Reasons for the Bill"

*"The Government launched the **Planning System Reform Project in December 2004** [NOTE*3] with the aim: to create a contemporary planning and land administration system, **processes and practices that will provide greater certainty, clarity and consistency** [NOTE*4] and which is flexible, timely, less repetitious and administratively manageable. The Government wishes to reform the planning system to save homeowners and industry time and money and give them greater certainty about what they need to do if they require development approval."*

*"People using the ACT's current planning system have found some aspects **slow, cumbersome, inconsistent and confusing**. [NOTE*5] Simple planning proposals often require the same long application and approval processes and timeframes as complex proposals. Low impact proposals often attract the same level of environmental impact assessment as higher impact proposals."*

QUESTIONS ARISING FROM THE ABOVE, RE NOTES [*1] TO [*5]:

***1.** These words sound like what is proposed for the 'new' planning system. How exactly will the proposed system be **"simpler, faster and more effective"** than the current system?

***2.** I assume the **"move towards national leading practice in development assessment"** for what is now the current system refers to 'A LEADING PRACTICE MODEL FOR DEVELOPMENT ASSESSMENT IN AUSTRALIA' published by the Development Assessment Forum in 2005. Why is it now proposed to move radically away from this 'LEADING PRACTICE MODEL'?

***3.** So this (same) **"Government launched the Planning System Reform Project in December 2004"**. Exactly why was it necessary to commence ANOTHER major **Planning System Reform Project** about three years ago now? Had this same government forgotten the learnings from the previous very comprehensive effort?

***4.** Is it seriously claimed that this new system, as opposed to the current one, is now going to deliver planning **"processes and practices that will provide greater certainty, clarity and consistency"**? In what ways is it imagined it will do that?

***5.** Supposedly the current system was a response to a previous planning system that was **"slow, cumbersome, inconsistent and confusing"**. In what way is it imagined that the 'new' system will be any improvement?

HAVE YOUR SAY

██████████ – Scullin resident

20/2/2023

I would like to provide some feedback on the following:

1. The Development Application process - fences
2. The *TS1__Technical_specification_-_RESIDENTIAL* **
3. *DS2__District_specification_-_BELCONNEN_2* **

I** am assuming these documents provide the rules that will be applied to properties in the Belconnen district in the future.

1. Development Application process - fences

I would like to make some comments about the current Development Application process by using my own experience. I have been trying to get permission to build a colorbond fence on a 'front' facing boundary for some time.

I live in a multi-unit housing development at ██████████, built in the mid-1970s. It is a lovely complex with lots of land with very old gum trees; a beautiful green environment. Each townhouse has boundaries that are fenced to varying degrees. I became aware after a survey in 2019 that my unit sits on a large parcel of land. I was not aware of the boundaries until this time as I assumed the previous owner fenced where the boundary was. I became very excited as I realised I could now grow a food bowl and plant a native garden. I am a passionate gardener.

Silly me thought fencing my property would be an easy task. The body corporate agreed with my proposal, but I discovered that I had to lodge a development application to proceed. I cannot understand why a compliance process (rather than a DA process) is not being used for fencing requests. ACTPLA knows what is allowed and sending someone out to view the property would have ascertained that I need a fence as ██████████ is a major road and it gets noisy. I need privacy as well.

I have recently lodged a Development Application as I have given up on trying to erect a fence without lodging a DA (approached my local MP, Jo Clay for help). Lodging a DA comes at a cost. I do not know what the final cost will be or whether the process will give me permission. The DA process has been onerous. I've had to make multiple calls to understand what is required and spent hours working through the planning website and using the eDevelopment site. I understand the need for this for many types of developments and also that controls do need to be on fencing. However, a compliance process surely is enough.

As stated I've lodged a DA now hoping I've done enough. I've done drawings etc myself as I cannot afford to get a draftsman to draw plans. I already know that my application is going to cost me \$500+ and likely more if the DA team decide they want more. I am a pensioner and I discovered there are no concessions available. Why not?

2. Comments on *TS1__Technical_specification_-_RESIDENTIAL*

Control: Ancillary structures - courtyard walls for multi-unit housing

Specification:

104. Courtyard walls forward of the building line achieve all of the following:

- Spec. a) a total length not exceeding 60% of the width of the block at the line of the wall
Comment: What does this mean?
- Spec. f) constructed of brick, block or stonework, any of which may be combined with timber or metal panels that include openings not less than 25% of the surface area of the panel and clearly distinguishes itself from a panel or timber fence


Comment: This specification enforces materials that are expensive and not widely used in the Belconnen area. Currently there are many colorbond and timber fences that face major roads (currently allowed under Element 2: Building and Site Controls, 2.6 Fences Beside Major Roads, Rule 9 where criteria can be met). To exclude these materials discriminates against lower socio-economic homeowners. Brick, block and stonework is expensive and building fences like this does not eliminate noise or provide privacy. Full colorbond or timber fencing is affordable, helps eliminate noise and provides privacy. Privacy is important as many people walk along major road pathways. The visual aspect of these fences can, and has, been mitigated in Belconnen with many trees and shrubs planted in front of the fences.

3. Comments on DS2__District_specification_-_BELCONNEN_2

1.17 Scullin

The following specifications provide possible solutions that should be considered in planning, placing, designing and using buildings and structures for proposed development in Scullin: There are no specific development and site controls for this locality.

There is no detail about specifications proposed for Scullin (or many other older suburbs) only a reference to what could be considered from the Strathairn detail. These two suburbs are not similar in any way. Are there plans to overlay Scullin with specifications that apply to Strathairn? I believe the character of Scullin should be maintained and any intended changes to specifications which may be applied to Scullin should be outlined not broadly referenced elsewhere.

From: 
To: [GENTLEMAN](#)
Subject: Draft Territory Plan
Date: Tuesday, 21 February 2023 8:40:43 AM

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ACT Planning Minister
Mick Gentleman MLA

Dear Minister,

DRAFT TERRITORY PLAN. Don't kill off suburbia.

I see that the ACT Government is looking at an emerging, apparently more sympathetic approach to town planning, called "**Urban Transect**"; its intent being "to help address the different ways people like to live, providing different urban environments appropriate to the location and the people who live there" (Appendix to the Draft Territory Plan).

We're told Transect won't replace Residential Zoning. But it should, and, reading between the lines, it will; hopefully making housing less the plaything of developers and spec builders, and therefore mostly qualitatively better, and more affordable.

The Appendix explains that Transect does not encompass the extant RZ2 Zone, a dumbed-down, divisive approach to "densification", resulting in mostly incongruous, garden-destroying second houses in back yards. RZ2 redevelopment has not taken off here, and reported planning modifications probably won't help. The Draft Plan proposes apartments in RZ2, also bound to be widely opposed.

Transect appears to seek to generally preserve established suburban single-dwelling environments; and looks to more suitable locations for progressively denser residential development of varying typologies, mixed with other compatible uses.

Many older ACT suburbs, like Kambah, with some connectivity improvements, already deliver that in their inspired original planning, and must not be destroyed with crude forms of "densification", often requiring expensive utilities upgrades.

With our brilliant, urban sprawl blight-preventing, multi-town centred city layout, properly planned new suburbs, near town centres, with affordable* land, can legitimately be a major part of the solution for growth, aided by fast-emerging clean forms and modes of public, and private transport.

Yours faithfully,



Kambah ACT 2902



*

Housing Minister, Hon Julie Collins MP,
Parliament House
Canberra

Dear Minister,

To sensibly and seriously tackle the worsening housing affordability and amenity debacle, Australia needs a revolution in the general **new-dwelling suburban market**.

Land is the key.

The price of a minuscule, narrow-gutted block of land in a new suburb is obscenely high (around \$600,000!). Increasing interest rates as a remedy is inequitable; and fiddling about with costly grants, "affordable" (read low-grade) dwellings, shrinking block sizes, reducing development standards, etc., is irresponsible.

Governments alone should carry out suburban land subdivisions, on compulsorily acquired land, and maintain supply - under rules set down by the Commonwealth.

Minimum sized (say 550-600 square metres) blocks in well-located and -planned new growth centres, should be sold directly to bonded bona-fide owner-occupiers only, for say, an initial independently valued "raw" land price component based on the prior use, plus the publicly ascertainable cost to bring the blocks to build-readiness, and a fair margin of say 10% for a typical block (slightly more for those with special characteristics).

Better for the government to help with housing this way (i.e.) forgoing excessive "market" profits on land, rather than tortuously setting up investment funds, and subsidising developers (they've created the problem).

Restore Aussie self reliance and individuality in housing, and stop the spoon feeding of families and other households with developers' dross.

Yours faithfully,

[Redacted signature]

Kambah ACT 2902

[Redacted]

14 Feb. 2023

Feedback on Draft District strategy for Woden

The ACT Government is proposing changes to the ACT's planning legislation to allow many more dwellings in existing suburbs. Many of which would be multi-storey, with less green space, fewer trees and resulting in a hotter and less healthy Canberra.

A critical test for any proposed densification must be “no adverse impact on the health and well-being of individual Canberrans”. The proposed new Territory Plan and Draft Woden District Strategy fail this test as they would exacerbate urban heat and so decrease health and well-being.

The Territory Plan and the District Strategies must focus on improving the urban environment to better adapt to climate change and to mitigate effects such as increased heat. Increased heat load has been shown to have poor outcomes for individuals' health. The adaptation for climate change needs to be set out in technical specifications in the draft Territory Plan.

Technical specifications for adapting to, and mitigating, 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 4 storeys or less to enable cooling by trees.

Subdivision of residential blocks (Dual Occupancy Developments) Subdivision of blocks in RZ1 must also specify soft cover: 40% of each block to be soft planting area with 30% - 40% tree canopy cover.

The Yarralumla Creek corridor must be preserved and enhanced as part of Canberra's 'blue-green network'. The Yarralumla Creek corridor is important to the community for recreation, active travel and for reducing urban heat. All the key sites and change areas for Curtin in the Draft Woden District Strategy involve the Yarralumla Creek corridor and its value to the community must be preserved and enhanced in any changes. Natural environments should be restored along Yarralumla Creek as part of an enhanced blue-green connection.

A "new edge street" through the Yarralumla Creek corridor, "to clarify the urban edge to Yarra Glen", should not be proposed. It would destroy the amenity the existing shared path and treed open space provides for the community. The proposed street would significantly degrade the primary blue-green connection of the Yarralumla Creek corridor. Tree loss would increase the urban heat island effect for this part of Curtin. A new street over Yarralumla Creek would significantly degrade the Yarralumla Creek corridor and destroy the amenity this treed open space provides for the community. Instead, a pedestrian and cyclist bridge over Yarralumla Creek should connect the new residential area with the rest of Curtin and open the north side of the Creek to recreational use by the community.

Woden north (the parts of Curtin near the large roundabout at the intersection of Yarra Glen, Yamba Drive and Melrose Drive) is a significant heat island and not a suitable site for more buildings which would add to the heat load of the area. The best use of the whole area is treed parkland to provide a cool place for residents of the nearby apartments and enhance the Yarralumla Creek corridor.

The former Curtin horse paddocks development must mitigate the impact of climate change: there must be a significant amount of treed public open space; 40% of residential blocks must be soft planting area with 30% - 40% tree canopy cover; and buildings must be 4 storeys or less to enable cooling by trees. These requirements should be in technical specifications.

The so called, 'Local centre' in the Draft Woden District Strategy Block 23, Section 29, Curtin (83 Theodore St, Curtin) (site of the Daana Restaurant) should not be designated as such. It is small and

does not meet the functional definition of a Local Centre on page 159 of the Draft Woden District Strategy: Smaller shopping centres that provide convenience retailing and community and business services that meet the daily needs of the local population. Consequently, for planning purposes it cannot be treated as a local centre equivalent to those in Lyons or Hughes, for example.

[REDACTED]
Curtin Resident

[REDACTED]
CURTIN
ACT 2605

RZ1 to RZ2 Conversion 23/2/23

The current RZ2 policy has worked well over the past 27 years however stocks of RZ2s have diminished & been absorbed. Mr Fluffy Scheme over the past 4 years has added approx 1050 RZ2s to the market and these have also now been built out. The RZ2 policy has worked.

I have attended numerous meetings and workshops in the past 6 weeks & have reviewed the current draft policies and also having been involved directly in designs of numerous dual occupancies from the outset in the 90s I offer the following :

- It has become clear through the Planning Minister that we have a great opportunity to look to “somehow” convert current RZ1 to RZ2, I strongly agree.
- We need to find a mechanism to convert some RZ1s to help achieve the outcomes of the New Territory Plan and help to achieve Housing targets
- We also need to somehow maintain the existing amenity of homeowners in the Brownfield zones, who may not want RZ2s popping up around them.

I believe the only way forward on this is:

- To convert RZ1s to RZ2 by having a **minimum block size**
- The current policy allows for RZ2s from 700m², I strongly believe that this is too small and will cause major concerns and backlash in the existing suburbs
- Blocks could be converted if they are a minimum size , for corner blocks of say 950m² and all other blocks may be considered if they are a minimum of 1050m²
- The number of dwellings would then convert to the current RZ2 “Table A2”
- Consideration should also be given where current RZ1 exceed say 1500-1600m² to fall under a 2 storey units policy
- If the above guidelines are not stringent enough, consideration should also be given that when the above block sizes are a met, a RZ2 may only be granted when a roads hierarchy network is also achieved. Each suburb would have a hierarchy placed on all its streets , and road networks. Perhaps a 3 tiered system. We don’t want to end up with numerous RZ2s in the end of a cul-de-sac or place in the furthest part of a suburb, road width may have to play a part in this.
- Consideration should be given to not allow RZ1 to RZ2 conversion , in say older pseudo heritage areas, ie Forrest , Parts of Red Hill, Old Yarralumla , Old Deakin, yes we do need to preserve some of these 2000m² + blocks.

Regards

██████████ Projects & Development Evri Group - ██████████
Vice Chairperson – Residential Planning Committee Property Council ACT
MBA Commercial Builders Sector Committee

