

[REDACTED]

[REDACTED]

25 February 2023

Hello,

We're providing this submission to highlight the possible incorrect zoning of Block 23, Section 29, Curtin (83 Theodore St) as CZ4. It does not meet the functional definition of a Local Centre on page 159 of the Draft Woden District Strategy.

Furthermore, as a residence of close proximity I can assure you that the block would not sustain commercial patronage beyond what it currently receives as a single restaurant, based on traffic logistics alone.

We're supporters of urban renewal but this block does not congruently fit into the larger plan. We would support the block being redeveloped into 3-4 (two-story) town houses (not sure of the zoning of that), but there's no need for it to be commercial given the close proximity of the Curtin shops.

Regards

[REDACTED]

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

23 February 2023

Feedback on Draft Woden District Strategy

It is with great interest that I have read the draft Woden district Strategy, especially in light of the light trail to Woden.

I am extremely supportive of the some of the key principles including:

- The blue-green network principles to maintain and expand urban tree canopy cover and expand opportunities for human movement through the blue-green network.
- 2046 targets for more nature and water retention in the city, reducing car dependence and promoting active travel.
- Re-imagined Yarralumla Creek connecting through the district Yarralumla Creek could be re-imagined as an urban waterway.

The proposed edge street to clarify the urban edge to Yarra Glen would be in direct conflict to all of the above principles. It would instead separate the existing suburban areas from the blue-green network by a road that would involve the loss of enormous amounts of existing tree canopy. Alternatively, this green corridor between Curtin and Yarra Glen could be a re-vitalised beautiful natural creek line with pocket parks as suggested. The completed creek rehabilitation and rain garden at the flood memorial site in Curtin and Athillon Drive Mawson are examples of where this has been very successful.

The increase in housing density in Woden has seen an enormous increase in pedestrians walking along the existing bike path heading north from Woden towards the Curtin Horse Paddocks. The bike path is also extremely busy with both recreational and commuter cycling traffic. To promote active travel and reduce the risk of collisions, a dedicated bike path would be extremely useful.

Any development of the Former Curtin Horse Paddocks is also an excellent opportunity to direct traffic from Cotter Rd to Yarra Glen (particularly southbound Woden traffic). Currently, McCulloch and Theodore streets are “ratruns” for those trying to get from Cotter Rd to Woden.

The key principles contained within the Draft Woden District Strategy are a great foundation to plan future development. Their practical application could create a beautiful, natural watercourse to promote physical wellbeing, active travel, and ecological engagement. This would benefit residents, visitors, and commuters. Edge streets and intrusive built frontage will not achieve these goals.

Thank you for your consideration,

[REDACTED]

Submission to ACT Govt
Draft New Territory Plan and District Strategy

Submitted by: [REDACTED]

Address: [REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

Submission on Draft New Territory Plan

On 14 February we attended the Deakin and Yarralumla Residents Association meeting on the Impacts of Proposed New Planning Framework.

Our analysis of the proposal is:

Point 1: It appears to favour complete deregulation under the banner of “more flexibility”.

Response: We already know from Andrew Barr’s failed “self-regulation” experiment that this leads to developers cutting corners, conveniently going bankrupt but being allowed to continue building, and someone else (usually owners) having to fix the mess.

Point 2: It proposes focusing on outcomes, which are only vaguely detailed and unlikely to be measurable.

Response: How is an “outcome” which isn’t delivered going to be fixed, and who pays for this?

Measuring the proposed plan:

At the meeting Dr Wright measured the new planning framework against current ACT plan using the Development Assessment Forum Model:

DEVELOPMENT ASSESSMENT FORUM (COAG 1998) - MODEL FOR DEVELOPMENT ASSESSMENT		
Leading Practices:	CURRENT ACT SYSTEM	PROPOSED ACT SYSTEM
1. Effective policy development	YES - except no Legislative Assembly scrutiny of Strategic Plans & some Plan Variations	NO – No Legislative Assembly scrutiny/approval of important ‘Supporting Documents’
2. Objective rules and tests	YES – criteria provide certainty to community & applicant	NO – “Criteria” replaced by vague, difficult to understand, poorly worded, ‘outcomes statements’
3. Improvement mechanisms	NO – no on-going evaluation of performance	NO – Major changes to current system not evidence based
4. Track-based assessment	YES	NO – all types of development are mixed up together
5. Single point of assessment	YES – however Planning Authority can override agency advice (e.g. heritage, trees)	YES – but Planning Authority has more power to override for “better planning outcomes”
6 Notification	YES – however issues with Pre-DA Community Consultation	NO – No Pre-DA Community Consultation; does not meet Consultation ‘principles’ in the Bill
7. Private sector involvement	YES – but only for building control	YES – no change
8. Professional determination most DAs	YES – however can be variable. Expert Local Planning Panels would be better for contentious DAs	NO – Ministerial ‘call-ins’ removed; non-statutory TECHNICAL SPECIFICATIONS can reduce assessment; No Expert Local Planning Panels
9. Applicant appeal	YES	YES
10. Third-party appeals	YES	YES – but some additional restrictions

Panel Discussion Slide –

The current ACT plan scores 9/10, and the proposed ACT plan scores 4/10.

Our submission to the ACT Government

Preferred Option: Stay with the existing ACT plan and shred/delete the proposed one.

Second option: It was stated at the meeting that 3 MLAs analysed the proposal and produced 49 recommendations for change. Update the draft plan to include these and then re-consult the ACT residents again to see if it is sufficiently improved.

Submission on Draft District Strategy

Our analysis of the proposal for Yarralumla is:

Densification:

The ACT Government proposes to increase the number of Yarralumla dwellings to 22,400 by 2063 (while increasing tree canopy cover).

Currently there are 1,420 (2021 census) dwellings, with another 380 approved (Brickworks) and 350 approved (CSIRO) totalling 2,150 dwellings in the next few years. The Brickworks and CSIRO will also include commercial developments which will increase traffic outside peak periods, just as Deakin is impacted by traffic for its commercial areas during the day. The commercial traffic will come mainly in cars.

Response:

This is obviously nuts.

We are in the process of having 12 weeks with only one access to Yarralumla from Adelaide Avenue because the Kent Street bridge is closed. This traffic mayhem makes it impossible to get in or out of the suburb without cars backing up onto Adelaide Avenue and Hopetoun Circuit.

It is not just a peak hour problem. The medical and hospital commercial facilities in Deakin mean there is traffic peaks all through the day, and this will increase when the Brickworks and CSIRO developments are completed. Many people will be in the older age bracket and use cars.

Traffic blockages at Yarralumla and Deakin will affect Adelaide Avenue's ability to perform as an arterial expressway.

Canberra was designed for the car, and this is why public transport has never worked, except for the Rapid bus routes running every 10 mins between the main town centres in their own lane with no stops.

If all the separate houses were turned into dual occupancies, it would add 923 dwellings. The road system could probably cope with this.

However, the people who buy in Yarralumla want mansions and there are houses with 10-14 car spaces and even one house taking up 2 blocks. All trees are usually removed. It is hypocritical of the govt to have granted permission for these monstrosities, and use them as a cash cow for rates, but now decide to densify the suburb. Obviously retaining tree cover is a lie, so the densification will not address any aspects of climate change, bird habitat or species extinction.

6 storey apartments:

The ACT Government proposes to put 6 storey apartment blocks across the South side of Yarralumla, from Adelaide Avenue to Weston St, Denman St and Hampton Circuit.

Response:

No. Plant any empty areas here with trees to improve our canopy coverage and bird habitat, and replant any grass with the endangered temperate grassland species.

SUBMISSION TO THE PLANNING SYSTEM REVIEW AND REFORM PROJECT -- TUGGERANONG DISTRICT STRATEGY

I am writing this submission to express my alarm about and opposition to the inclusion of Tuggeranong Homestead as an area of possible change.

Thirty-one years ago, I only knew Tuggeranong Homestead as a beloved landmark in the Tuggeranong valley. Its iconic landscape of corrugated iron shearing sheds, substantial homestead, outbuildings, and mix of mature exotic and native trees, seemed to embody the long history of the area. I was not yet aware of the whole story of the Tuggeranong Homestead.

In 1992 when government plans were announced for the development of several hundred medium density houses on the site, I was horrified and discovered so much more that was special about the place. I joined with others to form the advocacy group Minders of Tuggeranong Homestead (MOTH).

I learned that the history of non-indigenous settlement dated from the 1820's; that it had subsequently been home to convict labourers and a convict settler, Martin Pike; that it had been owned, farmed and occupied by the Cunningham family; that CEW Bean and his team had spent six years at the Homestead writing the history of Australia's engagement in World War I; that its heritage status was enshrined on the Register of the National Estate; that it had been home to generations of the farming McCormack family.

The property was given ACT heritage status in 1993. MOTH campaigned against the housing development and took a case to the Land and Planning Appeal Board in 1994. Our case was successful on heritage grounds and the housing development plan was abandoned by the government.

As special as the Tuggeranong Homestead was universally acknowledged to be in 1994, my understanding of its special status has only increased over the ensuing years. I have learned that the suspected presence of Aboriginal people at the site is confirmed, including documented evidence of a corroboree there in 1827. I have also gained a fuller realisation of the environmental importance of the Tuggeranong Homestead. This importance is reflected by the fact the Homestead is shown in ACT government plans as part of the blue-green network, the aim of which is to improve water quality and preserve green spaces.

Currently Tuggeranong Homestead plays an important role in local social, educational, and cultural life. It is an award-winning venue for weddings and other important celebrations, as well as hosting informative tours, book launches and author talks, themed heritage-related events and more.

The Tuggeranong Homestead site has played an integral role in the lives of Aboriginal and non-Aboriginal people throughout timeless history. It has earned a citation establishing its heritage credentials.

Please do not ruin the Tuggeranong Homestead with inappropriate development. Too many examples of local heritage have been allowed to moulder unloved and unoccupied, swamped by unsympathetic surroundings.

Yours sincerely



MOTH Committee Member

Submission to the Planning Reform and Review Project – Tuggeranong District Strategy

I wish to make a statement against the 'blue triangles' surrounding the Tuggeranong homestead that indicate that this historic site is being considered for 'possible development' under the Planning Reform and Review Draft Project.

As a concerned member of the Tuggeranong community the cultural and heritage value of the heritage listed Tuggeranong Homestead is of considerable personal significance to myself for my own family connections and to the people of Canberra and to all Australians for the following reasons:

1. Aboriginal heritage- a corroboree was held there as early as 1827, the earliest documented evidence in the ACT and also was the site of an Aboriginal tribal battle witnessed in the early 1850s.
2. Evidence of scarred red gums can be found on the homestead site and have been entered onto the Murrumbidgee Scarred Red Gum list maintained by the National Trust.
3. The Tuggeranong creek was a permanent source of water and food and is located close to the axe-grinding grooves located at Theodore and artefact scatters that have been documented on nearby 'Melrose Valley' property, indicating a long occupation in the locality.
4. In 1827 the homestead property was granted to Peter Murdoch, Superintendent of convicts at Emu Plains settlement and though already occupied as a convict outstation, under James Wright, was granted in 1835 to Thomas Macquoid, Sheriff of the Supreme Court of NSW. The convict built stone barn remains from that period and is still in use.
5. The property was the home of Martin and Mary Ann Pike a convict settler in 1842. Many descendants of the Pike family still live in Canberra. Two of Pike's sons became Mayors of Queanbeyan in the 1890s. Pike donated one acre of his land on which to build the first Tuggeranong school in 1878.
6. Pastoralist Andrew Cunningham and later James & Mary Cunningham and their family of eight children occupied the homestead from 1857 until 1917.
7. War historian CEW Bean, after whom the Bean electorate is named, and Bean's writers and their families occupied the homestead from 1919-1925 to begin the writing of the official history of the WW1. Bean created the first concrete cricket pitch in the FCT which is extant and considered part of the homestead's heritage listing.
8. Under the three generations of McCormack family management the Tuggeranong Picnic Racing Club track was created in 1930, that earned the family local legend status in recognition as the breeder and the winner of the inaugural Canberra Cup in 1927. Mechanised farming and fine-wool production were introduced from 1928 until the resumption of the lease in 1977.
9. Some significant trees, including oaks, cedars and a willow, are growing at the homestead some exotics are in excess of 160 years old. Monterey pines were planted as early as 1890.

10. The environment at the homestead precinct is important as it is part of the blue-green network considered integral to repair and maintain watercourses located in urban green spaces to improve the health of the waterways to Lake Tuggeranong.
11. A remnant area of yellow-box red gum grassy woodland remains as habitat for birds, animals and invertebrates at the homestead precinct.
12. The community enjoys and appreciates the open spaces at the homestead. A reunion weekend was organised in the past that attracted over 130 people who had family and social links to the property- including descendants of convicts and families of well-known families who had lived there and are connected to it either tangibly or intangibly.
13. The community group Minders of Tuggeranong Homestead (MOTYH Inc.) in conjunction with the managers has provided a connection of over 30 years of community-based activities on the homestead. Events include organised visits for various groups, disabled and aged communities, themed events, walks and talks, school visits, book launches by eminent historians and writers, Heritage Festival events, the CEW Bean Memorial lecture and many other community-based activities.
14. The homestead offers an attractive venue for weddings, parties, dinners, gatherings of many sorts and operates under the ACT Government Property Group. The managers conduct a successful business, a fine adaptive re-use of this historic site both professionally and in accordance with respectful heritage guidelines. It provides a pleasant vista, a window to the pastoral heritage the Tuggeranong Valley and green open space which is becoming rare and increasingly valuable to the community.

I believe the heritage and environmental values of this property far outweighs the notion of a development site for inappropriate urban infill!

To ignore the status of the property with its 200+ years of continuous history within the Canberra community would be an injustice.

The Tuggeranong homestead has proved and is still proving the value of a heritage property that the community respects and values for all its attributes and is providing the ACT Government with economic returns and a source for local employment.

There is available space elsewhere for development!

ACT Planning Authority
Canberra

COMMENTS – DRAFT WODEN DISTRICT STRATEGY PLAN

Good afternoon,

I have read the Draft Woden Strategy Plan in conjunction with the Draft Territory Plan and comment as follows:

Issue: TRANSECT ANALYSIS – CURTIN

DEVELOPMENT CONCEPTS ADJACENT TO YARRA GLEN AND MELROSE DRIVE

The draft strategies explore the possibility of medium and high density development along the west edge of the existing Yarralumla Creek stormwater channel, ranging from up to 12 storeys close to the creek, to six- then 3-storeys westward into the area bounded by Theodore Street and McCulloch Street. To make this viable a new road is conceptualised bounding this area immediately west of the creek.

A critical test of any proposed urban densification must be “no adverse effect on the health and wellbeing of Canberrans”. More dwellings in residential zones must not be at the expense of the community’s health and wellbeing.

The Woden Strategy Plan clearly fails this test:

Impact on existing residents east of Theodore and McCulloch:

Many residents east of Theodore Street including myself, have lived in this area for 50 years or more. We have developed our homes on the expectation the area will remain a pleasant, reasonably spread out style of living, with space for trees, gardens and families. The strategies being explored will destroy this expectation.

- Less backyard space for relaxing, gardening, and playing with kids;
- Thirty years or more of construction with inevitable dust, noise, congestion of builders’ vehicles, and torn up nature strips;
- Views to the east destroyed, and our privacy overlooked by, the planned barrier of tall buildings;

Recreation and Urban Heat Islands

- A large number of Canberrans currently enjoy strolling, bicycling and other recreation along the greenspace at the eastern edge of Curtin adjoining Yarralumla Creek. How this amenity will be maintained under the proposed strategy needs to be explained;
- Existing tree cover across the whole of Curtin is around 30%. A stated District Strategy objective is ‘maintain and expand urban tree cover’. The strategy and supporting documents propose a minimum tree cover on individual blocks of 6 to 8%. Roads have little or no tree canopy so fairly obviously *average* tree cover over the area will decline far below 30%.

Rationale

- Let alone the foreshadowed large buildings, the planned new road paralleling Yarralumla Creek will take up a large chunk of the existing greenspace; vehicle activity and noise will further degrade the amenity and peacefulness of the space;
- The science of warming of urban areas as tree cover declines is well established. This will become even more the case as climate change intensifies. Physical and mental health effects of ‘urban heat islands’ are also well understood.
- Loss of green space for recreation, inevitable under these ‘densification’ strategies, will also have physical and mental impacts on our community.

Issue: FLOODWAY CAPACITY AND RISK OF FLOODING

Severe flooding of Yarralumla Creek and associated loss of life in the 1960's is well documented. Improvements to capacity were made in response, however with intensification of climate change, prediction of flood flows has become extremely uncertain.. One fact is clear, rain events will be more intense than we have historically estimated.	
The Draft Woden Strategy foreshadows 'boxing in' of the floodway with tall densely spaced buildings along the Curtin edge, in what is currently floodway greenspace. This seems highly inadvisable if not foolish, in the current climate change uncertainty.	<p>Rationale</p> <ul style="list-style-type: none"> The proposal puts at risk not only residents of the proposed new buildings on the urban fringe, but also existing residents and their homes just to the west due to constriction of the floodway;
Furthermore, the planned development within the large roundabout at Yarra Glen and Melrose Drive is clearly <i>right in the floodway</i> . No detail is provided, of how this new precinct totally bounded by the existing circular roundabout roadway, might be accessed.	<ul style="list-style-type: none"> How does this proposed new precinct NOT constrict the floodway? What will be the effects to traffic on the roundabout, of vehicles entering and departing the precinct?

Issue: SUBDIVISION OF BLOCKS IN RZ1 AND RZ2; also LOCAL CENTRE AT BLOCK 23 SECTION 119

<p>The Draft Strategy proposes opening up of properties zoned RZ1 and RZ2, under constraints not yet clear, to subdivision.</p> <p>Again, under the test "no adverse effect on the health and wellbeing of Canberrans" this strategy raises a number of questions.:</p>	
What precisely will be the eligibility criteria for subdivision? It is essential these eligibility constraints be clearly defined, and the community given the ability to review them, <i>before</i> the Strategy Plan is finalised	<p>Rationale:</p> <p>Excessive subdivision will exacerbate:</p> <ul style="list-style-type: none"> 'Urban Heat Island', and Reduction of backyard amenity, discussed above;
What constraints will be imposed on the <i>rate of take-up</i> of the subdivision option? Or will it be unconstrained 'open slather'?	<p>Rationale</p> <p>Subdivision implies, by definition, increased residential construction activity. The current rate of urban renewal in Curtin, partly driven by Mister Fluffy knockdowns and reconstruction, has been and is considerable. This construction entails:</p> <ul style="list-style-type: none"> Congestion of streets due to large numbers of builders' and materials delivery vehicles; Constant noise, dust, construction activity spilling out onto verges and suburban streets, and damage to nature strips often not subsequently restored. <p>For the physical and mental health of other residents and their contentment and convenience, it is essential a limit be placed on how much of this disruption will be permitted at any given time , on a street-by-street basis.</p>

The Draft Strategy proposes designation of Block 23 Section 119 as a 'Local Centre'. When Curtin was originally developed this was a corner convenience store before development of the main Curtin (now Group) Centre. Since then it has operated as a restaurant under various proprietors.

Before it can be accepted by the community, the *reason* for this proposed designation must be more clearly stated.

The current zoning has permitted variously, operation of a local shop, and later a restaurant.

Rationale

- Precisely what range of permissible 'local centre' role(s) are envisaged) beyond what's already permitted? Parking on the site, and /or space for any expanded role, are severely limited.
- Under the Town Plan and Strategy Plan designation as 'local centre' opens up permissibility of wider land uses out to a radius of 400 metres from the centre. Is this (in the form of densification out to 400m beyond what would otherwise be permitted), the *real (unstated!)* reason for the proposed 'local centre' zoning?

Issue: TRAVEL TIMES WODEN TO CITY – LIGHT RAIL AND WODEN ROUNDABOUT

Currently, travel from Woden to Civic via Yarra Glen and Adelaide Avenue, by either bus or private vehicle, takes outside peak hour about 10 minutes. With the addition of light rail down the median, foot traffic access by residents to and from the light rail stations along this route will clearly increase this road travel time, *both offpeak and during the peak*. Travel along the route *by light rail* will also, inevitably, take longer than travelling this route (by bus) does now.

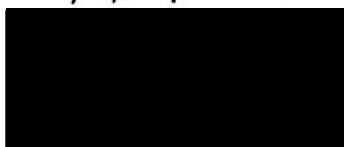
Given the enormous cost, difficulty and protracted disruption of achieving light rail from Civic to Woden, it is difficult to understand what nett benefits the light rail actually provides. This is particularly so when the hit to living amenity of many is considered, needed for viability of light rail.

An opportunity for proper evaluation of the proposal – rigorous realistic costings and an impartial cost-to-benefit analysis for scrutiny by the community and our elected representatives in The Assembly – is highly overdue and needed.

Rationale

- As far as we can understand, foot traffic access to light rail stations along Adelaide Avenue will be largely at ground level. The rail will also need to cross other traffic at various points. Delays will inevitably be introduced, and vehicle speed limits reduced;
- On information currently available it is hard to see how the proposed development *within the roundabout into Woden* will not *further* exacerbate travel times to the City.

Thank you, I hope these comments are useful in encouraging optimum results for our community.





Dear members

I am a Yarralumla resident and wish to let you know of my concerns and objections to the densification plan. Yarralumla is an established suburb with old and loved homes of an older generation as well as younger families and we recognise that some changes are required in the interest of the development of a growing Canberra that does not spill over into new outer suburbs and countryside.

The problems we see and object to are

1. Increased traffic and congestion along Dudley Rd and the Kent st bridge, not addressed by the current changes
2. The Yarralumla shops would not be able to accomodate the volume of people and cars for the vastly increased population from the Forestry Place development and the development of the brickworks
3. Adelaide avenue is a high speed and busy route to and from south Canberra with very few crossing points for cars and especially pedestrians. Putting high density living on both sides of this road would create noisy living spaces with little room for relaxation or movement. People in these apartments would view an uncrossable highway. Access roads behind these blocks would be clumsy and choked with cars.
4. Development here would imping on numerous embassies, some schools and also damage the outlook from the National Parliament

Finally I am concerned at the lack of involvement of NCDC in the plan. The absence of its oversight makes it seem that simplicity of the process and the cutting of red tape would only benefit developers of the dense projects and simplify the rezoning and the financial benefits to the ACT Governments bottom line. The NCDC protects the look and feel of our unique city and its general conformity the Burley Griffins vision.

In short it preserves the character of the city we love

Your sincerely



ACT PLANNING REVIEW

DRAFT DISTRICT STRATEGIES

DISTRICT SPECIFICATION DS4: INNER SOUTH

Dear ACT Government,

As a current resident of Forrest and a former resident of Deakin, I wish to address both areas so familiar to me. However, as my earlier submission of 15 November 2022 to the Inquiry into the Planning Bill 2022 of the ACT Legislative Assembly made clear, I am also concerned about the whole of the Inner South, and the whole of the Inner North, those areas which constitute both the built heritage and the important natural environmental history of the capital of Australia, the city of Canberra.

My concerns about the Inner South should be read as also applying to the Inner North. What I love about these areas is their sense of history, so absent in most of Canberra, the modest proportions and single level heights of most of their early housing, the solidity of their construction, the community-sharing and spacious nature of their original gardens, and their glorious trees, both within properties and along the streetscapes.

Many of these are qualities and values which I had assumed were shared by succeeding ACT governments. They reflected an awareness of the need for sustainability, micro-climate control, self-sufficiency, particularly in the production of fruit and vegetables, and social values of community sharing and a healthy environment. Each suburb within the general Inner South area also had a definable character, depending on when it had been developed. Thus, the 1920s era of Forrest, with its generous blocks and houses, gave way to the post-Depression era of smaller houses, cottages and blocks in Old Deakin. And the history of both these suburbs also serves as a history of Canberra's early Public Service, since together they housed many of the celebrated officials who built our city from its beginnings.

Moreover, over the years, as international awareness of the existence and causes of climate change increased, succeeding ACT governments introduced legislation to control the early use of home incinerators and fireplaces, thus fortunately curtailing one of the few environmental flaws of this early period in Canberra's history, also common in the rest of Australia, its use of fire for purposes of heating and waste removal.

My hopes for the continued integrity of both Canberra's Inner South and the Inner North were buoyed over the last twenty years by continual expressions of support by ACT governments for a carbon neutral future, sustainability, increased tree planting, maintenance of micro-climates, preservation of built heritage, whether public buildings or houses, and the democratic seeking of community feedback for all planning decisions, including the right to comment on developments in neighbouring properties.

Alas, the new Planning Bill 2022 appears to undermine my earlier optimism. It introduces major changes to current zoning laws, which have hitherto largely protected heritage areas; it resorts to a subjective outcomes-based rather than rules-based standard of planning; it heavily restricts community consultation; it gives undue power to developers

and a single planning authority without consideration of the need for official oversight; and it increases the acceptable height of buildings, allowing up to 6 stories, particularly in Deakin and Yarralumla, but even in the older suburb, Forrest. The more appropriate medium density development for the area, townhouses, which have existed in Forrest since the early 1960s, is hardly considered. Thus, the maintenance of the special and separate character of each of these suburbs is imperilled.

And so is the quality that I most value about these older inner areas, their built heritage and environmental history.

The outcome for the Canberra community, a loss of community trust in local government, could be remedied if a number of steps are introduced into the new Planning Bill which ensure: (1) the clear separation of powers between the planner and a separate planning oversight body; (2) oversight by the ACT Legislative Assembly; (3) clearer enunciation of standards and technical requirements; (4) regulations to ensure practical government accountability to ACT voters, providing evidence of government responsiveness to community suggestions; (5) regulations for early community involvement before a project is developed or a decision is taken; (6) a development assessment system which complies with nationally agreed benchmarks; and (7) practical adherence to the government's avowed environmental and heritage values, especially in regard to the maintenance and extension of the tree canopy and respect for the built history of Canberra.

Yours sincerely,

[REDACTED]

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

From: [REDACTED]
To: [EPSDD Communications](#); [REDACTED]
Subject: Re: Belconnen resource management centre, no longer in consultation plan
Date: Monday, 27 February 2023 4:21:36 PM

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Hi [REDACTED]

Thanks for getting back to me. It is disappointing that the public can comment on roads, urban zoning for industrial, residential and commercial use but not the impacts that a resource management centre will have on the community as a part of one process.

The fact that the ACT Government wants to build a resource management centre so close to ginnederry and holt communities and is not having this as a part of the planning process for these areas is quite disingenuous. Especially given that 1) consultation was done over christmas 2) that it took much community pushback to extend the feedback period and 3) that this resource management centre zoning was actively removed from consultation documentation.

Finally, the use of double negatives as a part responding to me is just plain silly. Tell you bosses that active writing is best:)

Best of luck with getting this through!

[REDACTED]

On Mon, Feb 27, 2023 at 10:43 AM EPSDD_Communications
<EPSDDComms@act.gov.au> wrote:

OFFICIAL

Hi [REDACTED]

Sorry for the delay in getting back to you.

The Government is still considering the future of the Belconnen Waste Resource Centre. This is the subject of a development application (DA 202240118) that has been publicly notified. The Planning Authority is currently considering the development application.

The draft Belconnen District Strategy is a broad, strategic document and does not include individual development applications for sites. However, district strategies can be updated in the future to reflect decisions on sites and precincts such as the Belconnen Waste Resource Centre.

The absence of the Belconnen Waste Resource Centre in the draft Belconnen District Strategy does not therefore mean that it will no longer exist in that location. This is yet to be determined.

Further information on waste management sites, including the Belconnen Waste Resource Centre can be found on the [City Services website](#).

Thanks,

[REDACTED]

From: [REDACTED]
Sent: Friday, 24 February 2023 5:25 PM
To: EPSDD_Communications <EPSDDComms@act.gov.au>
Subject: Re: Belconnen resource management centre, no longer in consultation plan

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Hi Team,

Can you please confirm if there is still a resource management centre being considered as a part of the belconnen plan? It seems to be no longer in any of the consultation materials.

[REDACTED]

On Thu, Feb 23, 2023 at 6:24 AM [REDACTED] > wrote:

Hi Team,

In the previous materials posted online for the Belconnen rezoning, there was inclusion of a draft rezoned area for Belconnen to have a Resource Management Centre or dump.

This appears to no longer be included in the materials online but was included in the rezoning for previous consultation.

Can you please confirm if you will be including a rezoning resource management area or increasing an existing site the Belconnen area? If so where is it and where are the materials about this?

https://hdp-au-prod-app-act-yoursay-files.s3.ap-southeast-2.amazonaws.com/7816/6736/7509/Belconnen_District_Summary_V8.pdf

https://hdp-au-prod-app-act-yoursay-files.s3.ap-southeast-2.amazonaws.com/8816/6848/3097/Draft_Belconnen_District_Strategy_-_08.11.22.pdf

[REDACTED]

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SUBMISSION

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

Summary

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

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

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

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

The proposed Inner South District Strategy is not supported.

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

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

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

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

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

Proposed new ACT Planning System

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

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

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

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

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

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

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

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

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

Inner South Draft District Strategy

We do not support the proposed Inner South District Strategy.

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

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

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

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

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

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

At a minimum, they deserve a proper consultation process.

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

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[REDACTED]

From: [REDACTED]
To: [EPSDD Communications](#)
Subject: Submission regarding Curtin aspects of Draft Woden District Strategy
Date: Monday, 27 February 2023 4:39:36 PM

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Hello

I am a Curtin resident wishing to make comment on the proposals but I can't find the page to do so, so I am just sending this email as a submission. I hope you can consider it. According to our residents' association, submissions are closing 3 March 2023. Please make it easier for ordinary residents to comment.

In brief I support the aims to increase livability but have some concerns about a new street along the Curtin edge. Careful thought should be given to the implications of a once in a 100 year flood, and not creating flood risk for residents. There may be some areas along that corridor that could be safely developed but a thorough risk assessment would be required. Maintaining the pedestrian, equestrian, dogwalking and cyclist amenity that already exists. This green strip is currently an off lead dog walking area which is very important to us. This shared amenity is one of the main attractions of the Curtin edge and could not be improved by the proposals for an additional street and housing which would also increase climate change by reducing the tree canopy. The idea for creating separate pedestrian and cycle ways and a pedestrian/cycle bridge over the Yarralumla Creek is acceptable.

There seem to be large swathes of land adjacent to tuggeranong parkway that could be better for development purposes. The old horse paddocks area could be sensitively developed, with a connecting bridge, so this part of the proposal is more acceptable.

Thank you

[REDACTED]

ACT Government's New planning Framework for Yarralumla and Deakin, as laid out on Feb 14 '23.

I am a resident of Yarralumla, and am making a submission concerning the proposed changes to my suburb.

[REDACTED]
[REDACTED]
[REDACTED]

February 27 2023

Some 97.5% of those that attended the meeting of February 14th did not support the extensive high density, high rise changes to Yarralumla and Deakin as proposed by the ACT Government.

Yarralumla:

In Yarralumla, where I live, the Brickworks and CSIRO Forestry redevelopments which are currently underway, or in the planning stage, will together add about 730 new dwellings, (a 50% increase in the Yarralumla population), also 1000 more cars and a lot more congestion on roads that have not been widened. From the north, Yarralumla is only accessed through Novar Street and Hopetoun Circuit. These points are already jammed with traffic in the morning and evening. Moreover, there is no provision for local shop expansion and the resultant increase in parking availability.

The scale of the development proposed for Yarralumla would result in some 30 %to 50% of the suburb becoming 3-6+ storey apartments. It has been suggested that homes would be acquired through compulsory buy backs, but the homes in Yarralumla are now worth upwards of 1.5 million dollars. Would these buy backs be economic propositions? Would the average citizen of Canberra be able to afford an apartment of such a high price and would a wealthy citizen wish to buy such an apartment when he/she could buy a house?

This proposal would change the character of our suburb forever, making it more like an addition to the city space rather than a small suburb where people come for recreation. Much of the existing tree canopy cover will be lost and extensive urban heat islands will be created, in contravention of the Urban Forest Bill of 2022. Has the government forgotten that Australia is suffering significant climate change?

Concerning the Adelaide Avenue Redevelopment:

Air and noise pollution will make residents in these high rise buildings a drain upon the health system of our territory and perhaps a kind of urban ghetto will develop.

Again, the proposed area of redevelopment to high rise, high density, includes the areas which are now the Yarralumla and Deakin Diplomatic Precinct. This is Commonwealth land and the responsibility of the National Capital Authority. The Diplomatic Precinct currently comprises the Embassies of Saudi Arabia, Nigeria and Sri Lanka in Yarralumla and Italy in Deakin. The Canberra Girls' Grammar Junior School is also at risk and is currently zoned 'Community Facility'. The open space provides endangered grasslands habitat.

Conclusion:

Despite the consultation meetings, the views of residents across the ACT have not been genuinely considered. and the district planning consultation from just 2021 has been totally ignored. Community views should be genuinely considered and comprehensively reflected in the new planning framework.

Submission to ACT Government Draft Territory Plan and District Strategy

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

27 February 2023

I wish to express our extreme opposition for the planning proposal for Yarralumla for the following reasons:

1. Yarralumla is a residential suburb not inner city and therefore intensive infill is out of character with the suburb and overwhelmingly opposed by the residents, as demonstrated as a recent meeting of the Yarralumla Residents Association and the Deakin Residents Association.
2. The roads in and around Yarralumla already exceed traffic load limits and the shopping centre has very limited parking, which has affected growth of the shops. In addition, the planned developments for the Yarralumla Brickworks site and the CSIRO land will already greatly increase the population of the suburb, which does not have infrastructure to support.
3. Rationale for light rail no longer exists. The argument about getting oil fuelled cars off the road is no longer relevant as the ACT races forward in the uptake of electric vehicles, solar panels and batteries. This is no longer an emissions argument.
4. The intensive infill of Canberra is a political decision in order for the government to maintain balance of power. This should not dictate the kind of suburbs we live in. There is great respect for a decentralised garden city, where workplaces are located in town centres and people can live near their workplaces and travel is reduced.
5. Intensive infill is disruptive to sustainable goals, ie no space tree canopy cooling, unit buildings which require heating, cooling and cannot access sunshine and through airflow.

Please find below comments on the draft planning documents.

Draft Territory Plan

1. The plan needs to be simpler to use. Residents should not be engaged in onerous research to protect the aesthetics of their suburb from gross overdevelopment.
 - The Government's stated purpose for the planning reform is: "To deliver a planning system that is clear, easy to use and that facilitates the realisation of long-term aspirations for the growth and development of Canberra while maintaining its valued character".
 - The draft Territory Plan and supporting documents do not meet the stated purpose of a clear and easy to use planning system. The multiplicity of documents and their complexity will make them difficult to understand, to administer and to evaluate. Radical change is needed to fix the problems
2. A genuine commitment to an outcomes based approach based on evidence is required.
 - If the Government is transforming the planning system by moving to an outcomes based approach, it should demonstrate its genuine commitment to that approach by showing that it is informed by evidence. This will contribute to confidence that as Canberra grows and develops, its valued character will be maintained.
 - The draft Territory Plan relies too much on subjective assessment. It should have clear, quantifiable outcomes measures. The government's definition: "Good outcomes that meet community needs" means very different and frequently conflicting things to different members of the community.
 - The ISCCC supports the Conservation Council's recommendation that research needs to be undertaken on the carrying capacity of the ACT to inform the Territory Plan and thus set meaningful population targets to live within our region's means.
 - The Government must show it evaluates and learns from the outcomes of past initiatives, including by:
 - A. Evaluating the Mr Fluffy program which allowed for dual occupancies to be built on Mr Fluffy blocks bigger than 700 sq metres to learn lessons before any expansion of this model across Canberra. For example, how many of the blocks were actually turned into dual occupancies compared to new single dwellings? Did the redeveloped blocks provide at least 30 percent plantable area? Was there sufficient room for canopy trees to be planted? Did they protect neighbours' privacy and access to sunlight?
 - B. Evaluating the success of RZ2 zoning in providing medium density housing to

learn lessons for the proposed further relaxation of requirements for multi-unit residential development near local and group centres.

3. There must be greater clarity and certainty in decision-making on development applications (DAs)

- The Territory Plan must incorporate tighter definitions of desired outcomes, based on verifiable evidence and objective measures of compliance.
- Key mandatory DA assessment requirements from the Technical Specifications and other supporting material must be included in the Territory Plan, to enable Assembly and community oversight.
- In particular, there must be mandatory requirements for measures which protect the amenity of existing and future residents, such as access to sunlight/natural light, privacy, amount of planting area on residential blocks, building height, and protection of the character of heritage precincts. Residents have demanded a say on neighbouring knockdown rebuilds (in response to the ISCCC's online survey in 2019/20). These issues matter to people because they facilitate a liveable environment.
- The proposed Territory Plan does not provide for these key characteristics of a liveable environment, so the Government must make such key requirements of concern to residents mandatory and include them in the Territory Plan rather than in Technical Specifications and Design Guides which create uncertainty as to outcomes.
- The Living Infrastructure provisions which came into effect for established suburbs on 1 September 2022, and which are critical to climate change resilience, must not be watered down in the new Territory Plan. It seems, for example, from the Technical Specifications (page 5) that single dwelling residential blocks larger than 500 sq metres will only be required to have 24 percent plantable area on the whole block rather than 30 percent laid out in the Living Infrastructure provisions in the current Territory Plan. This seems to have been done by changing planting area to a percentage of private open space instead of the whole residential block.
- The proposed development assessment system should comply with nationally agreed benchmarks, namely the 'Development Assessment Forum' (DAF)'s 'A Leading Practice Model for Development Assessment in Australia'. Currently, it does not.
- As the Design Guides are not yet available, a period of at least four weeks for public comment should be allowed when they become available.

- The criteria for exemption from the requirement for a Development Application are not yet available. A period of at least four weeks for public comment should be allowed when they become available. As these criteria will comprise mandatory criteria, they must be included in the Territory Plan.
- Proposed changes to mandatory requirements in the Territory Plan should be treated as a major amendment, with appropriate notification to the Legislative Assembly and provision for the amendment to be disallowed if the Assembly considers that to be the appropriate action.
- An explicit requirement that DAs involving protected trees should be referred to the Conservator should be included as a mandatory Assessment Requirement in the Territory Plan (or as an amendment to the proposed Planning Act). Decision makers who decline to follow the Conservator's recommendation(s) should be required to give reasons for their decision.
- An explicit requirement that DAs involving heritage matters are to be referred to the Heritage Unit and Heritage Council should be included as a mandatory Assessment Requirement in the Territory Plan (or as an amendment to the proposed Planning Act). Decision makers who decline to follow the Heritage Council's recommendation(s) should be required to give reasons for their decision.
- The current Heritage rules must be maintained, and all development must preserve the built heritage, streetscape and character of heritage precincts. Property-buyers should be asked to sign a declaration that they are aware of heritage rules and will respect them.

Draft Inner South District Strategy

- There must be an evidence-based, more rigorous methodology for projecting population increases in the ACT and hence the number of additional dwellings required annually, and where.
- A clearer evidence base is needed for the proposed Transect approach to Urban Character Types (eg General Urban, Urban Centre, Urban Core), and how it informs the building heights shown in the Sustainable Neighbourhoods maps, how it would interact with the zoning provisions in the Territory Plan, and how it will ensure resilience in the face of a warming climate, including through the provision of adequate green space and tree canopy cover to prevent heat islands. A regularly updated heat-map is required to provide evidence that developments do not lead to temperatures harmful to health.

- Instead of random upzoning in a district, it is preferable to have structured community engagement to ensure co-design of precinct scale developments, and then improvement of processes between participating Government agencies, the private sector and the community to deliver the redevelopment of precincts in a timely way.
- The ACT Government must use a genuine and well-structured, rather than “rubber stamp”, community engagement and co-design approach on the district strategies, including by promoting the community engagement processes widely, at accessible times and places, with reasonable timeframes for comment, and by providing good quality, high resolution maps and other information to support the community in providing better informed feedback. This is especially important in view of current community feelings of disempowerment and the experience of not being listened to.
- The Inner South Canberra Community Council’s “Inner South Canberra District Planning Strategy - Future Directions for our District - 2021” is a thorough, locally-sensitive, attempt at a District Strategy. This should be drawn on more comprehensively in revising the Government District Strategy for the Inner South.
- The proposed District Strategy needs to better acknowledge and deal with heritage. Currently it seems to address heritage mainly under the Blue-Green Network under Conservation Connectivity. It is important to acknowledge and maintain built and cultural heritage, not just natural heritage. The Sustainable Neighbourhoods Section and map at Fig 36 need to clarify this.
- At the same time, the ISCCC supports the proposed initiative in the Blue Green network to protect and enhance the Jerrabomberra Wetlands Reserve, and the Jerrabomberra Creek corridor.
- We consider that the identified primary and secondary liveable blue-green network does not fully capture the high value biodiversity network in the inner south, and needs more work.
- The need for social housing to be included in new developments is important in the Inner South. For example, this should be included in the list of principles for planning East Lake (p121 of the draft Inner South District Strategy).
- Oaks Estate residents have asked that the suburb be included in the Inner South District Strategy, not in the East Canberra District Strategy as currently proposed.

- Greater consideration needs to be given to the future of the Canberra Railway Station.
- More work needs to be done to identify ways of improving transport access by making it easier for people to get around by car, by public transport or by active travel.

The Process from here

- Once comments received have been incorporated, the next version of the Planning Act and Territory Plan and associated documents should, as a package, be released for final public comment before they are finalised.
- The process of developing the Inner South, and other, District Strategies should provide for a further period of community engagement after the Planning Act and Territory Plan are finalised.
- As recommended by the ISCCC the government should seek advice on the risks of moving to discretionary decision making, as inevitably there will be merits and judicial review. The likely monetary and social risks are a consideration that has not been discussed.

In summary, we whole oppose the ACT Government's proposed changes to planning. While action in this area has been required for some time, the current proposal will see an 'anything goes' approach to planning. The ACT Government made up of our elected representatives should, in fact, be protecting residents from the excesses of development.

I understand the documents underpinning the “New Planning System” run to some 2500 pages and has been issued without any meaningful presentation/discussion with the Canberra community nor does there appear to have been any roadshows etc to explain the implications for the local communities. In this vacuum I have had the benefit of some concerned local citizens and up front **I wish to endorse the submission from the Yarralumla Residents Association** who have at least attempted to engage with the community.

Much has been made of an Outcome focussed planning approval process. Outcome is not defined in section G and as such essentially invites a laissez faire approach of anything goes. I suggest my concept of a desirable outcome would not be shared by the likes of, as an example, Doma or Geaocon. Given the current domination of property speculators and developers under the current planning regime one can only expect the rapid demise of the garden city/bush capital under the proposed arrangement. Given the lack of Laws, regulations, bylaws and rules and legislative scrutiny under an outcome approach the limited opportunity the community currently has to achieve sensible planning results will be diminished/removed. This should not be permitted.

The Laws, regulations, bylaws and rules currently underpinning the RZ1 And RZ2 zones should be maintained and more importantly be applied and enforced by the Government and the planning bureaucracy. Comment has recently been made that the RZ2 zones should be expanded. The need for this is not evident from the experience of the last 20 years where there has been little take up of the opportunity to develop dual occupancies near local business areas.

The proposal to allow the construction of 3-6 stories in large parts of Yarralumla and Deakin has no regard for the current style/amenity of those suburbs and would no doubt overstretch the current infrastructure and appear to pay no regard to the current large-scale developments being proposed for the area. (Brickworks/Csiro)

- Developments of this nature would also seem to totally inconsistent with the Government’s ‘commitment’ to maintaining and enhancing the green canopy.
- The plan also seems to ignore the presence of several embassies, the role of the National Capital Authority and the processional nature of Adelaide Avenue.
- The plan refers to an Equestrian park offset in the vicinity of the former CSIRO site but provides no detail of what this is.
- The plans ignores the potential for a wetland development replacing the large drain running through Yarralumla.

It is understood COAG has developed a model for “Good Practice” in the assessment of property developments. An analysis of the “New Planning System” strongly suggests it fails to meet most of the 10 leading practices adopted by COAG. This suggests much more work needs to be done on the “New System”.

While there seems to numerous other deficiencies in the “New Planning System” many of which seem to be of a technical, but unexplained nature, which is why it is essential you take

notice of submissions from resident and community groups. These groups often have the knowledge and interest of the city's rate payers at the centre of their concern and attention.

While the current system may need some tweaking the most significant action required would seem to be a willingness and commitment from Government and the Bureaucracy to apply and enforce the existing Laws, regulations, bylaws and rules.

[REDACTED]

[REDACTED]

Objections to the Proposed New Territory Plan, and Draft District Strategies

I have significant concern with the proposed new Planning Framework in that the planning outcomes are too vague and this will allow developers to propose plans that 'look good' but lack substance – a developers dream – major issues such as impact on the community, climate, govt facilities (schools etc) need to be included with developer responsible for funding to meet requirements of those facilities. In particular the following amendments should be made

- longer periods for review are required
- Good consultation – what does that mean
- consistency in approach – how is it to be achieved against a vague feel good planning process – this will just lead to glossy developer brochures with little oversight to ensure community needs are met
- what is substantial benefit – and reasons why a decision is made need to be made public and be subject to review
- strong compliance and enforcement is required to ensure that developers are held to account for projections such as traffic movements, requirement for government facilities etc and if outcomes are detrimental to that stated in their submissions then significant penalties should apply that allow rectification of the adverse issues caused.
- required to plan for climate change and biodiversity and ecological sustainable development (whatever that means)- this is critical yet the proposed plan and South District Strategy Plan allows for significant densification with its associated detriment to the environment.

Additionally the proposed New Planning Framework should not be put in place until:

1. The retention of the existing character of Yarralumla and Deakin has been addressed and formally included in the proposals.
2. The new planning framework, in particular the Inner South District Strategy and Territory Plan Zoning, provide that there is to be no further densification of Yarralumla beyond that of the Canberra Brickworks Site and the CSRIO Forestry Site have been established and their impact on the community is known. Otherwise there is a risk of turning the area into a concrete nightmare that significantly changes the character of the area.
3. the District Strategies should not be subject to change based on community input, with the Minister having to include the community amendments.
4. The components of the planning framework that are used for assessment are statutory, in particular the Technical Specifications – otherwise developers will have a field day presenting glossy brochures but not held to account in delivering for the community.
5. The New Planning Framework will clearly provide for development, but the achievement of other outcomes is unlikely owing to its lack of clarity, complexity and mix of statutory and nonstatutory components, and lack of hierarchy. It is likely to be more costly and less efficient.
6. The Inner South District Strategy should be revised to ensure that loss of tree canopy cover through urban infill, and the creation of urban heat islands, does not occur in Yarralumla. Yarralumla's tree canopy cover of 30% must be protected and retained. This

should be done by removing the densification and urban infill that has been proposed for Yarralumla, and similarly for Deakin.

7. The rationale underpinning densification, concentrating development along transport corridors, and 70% of new housing being in existing urban areas to reduce the carbon footprint, should be reassessed in light of the fundamental changes in the work and transport paradigm. The existing planning framework should remain in place until this has been undertaken.

8. The views of the residents of Yarralumla have not been genuinely considered, in particular that the existing character of the suburb be retained. Community feedback from the 2021 district planning consultation for the Inner South has been ignored (Draft Inner South District Strategy Page 91) and these issues remain.

Regards

[REDACTED]

[REDACTED]

[REDACTED]

Submission on the ACT Government's New Planning Framework

addresses District Strategies, New Draft Territory Plan, District Specifications, Technical Specifications, and "Explanation of Intended Effects for: ACT Urban and Housing Design Guides"

Summary

1. The community's requirement that there be no further densification of Yarralumla and Deakin and that the low density, low rise character of these two suburbs be retained, should be accepted and the Inner South District Strategy revised.
2. The new outcomes based planning framework should not be implemented in its current confusing, complex, unaccountable form.
3. All the materials that inform decision making should be statutory instruments not guidance material and included in the Territory Plan.
4. Further zoning changes to give effect to the large scale densification of Yarralumla and Deakin proposed in the Inner South District Strategies is not supported due urban heat, loss of urban tree canopy cover to below 30% and the community's view that the character of the suburbs be retained.
5. Community consultation has not met good practice, and community views should be genuinely considered, comprehensively reflected in the new planning framework, including the Inner South District Strategy, and a further round of consultation undertaken.

1. Further Densification and Infill of Yarralumla and Deakin is not supported

The New Planning Framework through the District Strategies and the ACT Planning Strategy 2018, sets the direction for long term, large scale, high density urban infill, that is predominantly high rise. The requirement being that 70% of new housing is in existing urban areas and that this is to be given effect to by the Territory Plan.

ACT Government "Explainer – Providing Feedback on the New Planning System" and "At a Glance - What are District Strategies"

- ❖ *"The district strategies are a new level of strategic planning to deliver plans for our nine districts to guide future growth".*
- ❖ *"Draft district strategies capture the special character of and aspirations for each Canberra district as told to us during previous consultation"*
- ❖ *"these strategies are developed in good faith, with the best available data, and are underpinned by modern planning methodology and practice.....In their entirety they do not represent a final government position"*
- ❖ *"The draft district strategies propose a set of key directions and initiatives to address local needs, protect what is valued in the district and support innovative, sustainable growth and development."*

<https://hdp-au-prod-app-act-yoursay-files.s3.ap-southeast-2.amazonaws.com/5716/7514/5453/At a glance - Engagement Explainer.pdf>
<https://hdp-au-prod-app-act-yoursay-files.s3.ap-southeast-2.amazonaws.com/4916/6720/1208/At a Glance - Draft district strategies.pdf>

The ACT Government statements on the District Strategies are that they will protect what is valued in the district, capture the special character and aspirations of each district as told to us in previous

consultation, address local needs, are developed in good faith with the best available data. However none of this withstands scrutiny.

The Inner South District Strategy sets out large scale redevelopment for Yarralumla and adjacent Deakin with 30%-50% of the residential area of the suburbs to become 3-6+ storeys apartments. Not only is this excessive, it does not align with the strongly held views on retaining the character of the suburbs that are low rise, low density the community previously conveyed to ACT Government at the Inner South District, district planning consultation in 2021. . This community view firmly remains, at the meeting of 200 Yarralumla and Deakin residents, in mid February 2023, 97.5% were opposed to further densification. The Canberra Brickworks and CSIRO Forestry site redevelopments, will add 730 new residences to Yarralumla, taking it to 2,150 residences, that is a 50% increase in the number of dwellings in the suburb. Further infill is not warranted and is not supported.

The community views expressed in 2021 did not elicit any change to the proposed scale or direction of densification and do not support the contention that *“these strategies are developed in good faith, with the best available data”*. In 2023 the Yarralumla and Deakin community has restated its view that there be no further densification and the valued character of the suburb be retained is questionable as to whether this will be addressed *“in good faith”*.

- The community’s requirement that there be no further densification of Yarralumla and Deakin and that the low density, low rise character of these two suburbs be retained, should be accepted and the Inner South District Strategy revised.

2. Outcomes Based Approach is flawed and not simple, accountable, effective or reviewable

The ACT Government advises that community and professional feedback was used to develop the new outcomes focussed planning system. This new planning system is stated to have *“an easier-to-use and outcomes-focussed Territory Plan will provide greater flexibility in the way developments can be designed”*.

ACT Government “At a Glance - proposed Territory Plan

- ❖ *“Community, industry and planning professionals feedback was also used to help us develop an outcomes focussed planning system based on a draft new Territory Plan that is supported by compliance with technical specifications”*
- ❖ *“The proposed Territory Plan has a new structure. It references supporting material such as design guides and technical specifications. The proposed plan does not include major changes to current zoning and still sets parameters that development must meet, such as land use, building height and setback.”*

https://hdp-au-prod-app-act-yoursay-files.s3.ap-southeast-2.amazonaws.com/3216/6728/5394/Snapshot_Territory_Plan_Overview.pdf

The proposed outcomes based framework relies on multiple interrelated elements and qualitative judgements against broad vaguely defined outcomes, rather than quantitative assessments. The draft new Territory Plan is a statutory instrument however assessments will rely on non-statutory supporting material including the District Specifications, Technical Specifications, and the ACT Urban Design Guide and the ACT Housing Design Guide (not yet available for consultation input).

The ACT Government states that there is a *“draft new Territory Plan that is supported by compliance with technical specifications”*, however there can be no formal requirement for compliance with non-statutory material as this does not have any status in law and compliance can thus neither be

required nor enforced. Applying non-statutory materials in this way also effectively voids the ability of proponents and interested parties to seek a formal review of planning decisions by the Planning Authority or the ACT Civil and Administrative Tribunal).

Moreover, the ACT Government's statement on the purpose of the supporting material, particularly in regard to the compliance with the "Technical Specifications" is at odds with the legal requirement as stated in the *Planning Bill 2022*, which is to help readers understand and apply the Territory Plan – not for assessment purposes as part of a statutory process.

- ❖ *"Planning Bill 2022 - Draft Territory Plan - S49 (2) The territory plan may be supported by background material, guides, advisory notes or anything else (the supporting material) that the territory planning authority considers will help readers to understand and apply the territory plan".*

- The new outcomes based planning framework should not be implemented in its current confusing, complex, unaccountable form.
- All the materials that inform decision making should be statutory instruments not guidance material and included in the Territory Plan.

3. Territory Plan zoning changes to give effect to District Strategies for urban infill and densification of Yarralumla and Deakin are not supported

The ACT Government states that there are no major changes to zoning in the new draft Territory Plan but this is misleading.

ACT Government "At a Glance - proposed Territory Plan

- ❖ *"The proposed plan does not include major changes to current zoning and still sets parameters that development must meet, such as land use, building height and setback."*
https://hdp-au-prod-app-act-yoursay-files.s3.ap-southeast-2.amazonaws.com/3216/6728/5394/Snapshot_Territory_Plan_Overview.pdf

The impact of the changes to RZ1 and RZ2 are significant. For RZ1 they provide for 90m² secondary dwellings on existing blocks, basements, and for 70% of block to be built on. This will create heat islands and hence not mitigate climate change impacts and is in conflict with the

- ❖ *Planning Bill 2022 Part 2.2 sustainability and resilience principles (b) – "effort should be focussed on adapting to the effects of climate change, including through mitigating the effects of urban heat"*
- ❖ Urban Forest Strategy and *Urban Forest Bill* that set the target for the tree canopy covering 30% of the Territory's urban areas. The tree canopy cover in 2022 in Yarralumla was 30% and Deakin 34%.

Such urban infill for Yarralumla and Deakin is not supported, nor its consequential effect of reducing the tree canopy cover below the existing target of 30% and increasing urban heat.

Moreover The Inner South District Strategy proposes a major redevelopment of Yarralumla and adjacent Deakin, with high rise, high density apartments. This will require the zoning of Yarralumla and Deakin in the draft Territory Plan (Part E1) to be changed from low density RZ1 and RZ2, to RZ4 Medium Density and RZ5 High Density Residential Zones.

As the draft new Territory Plan is required by the Planning Bill 2022, when it becomes an ACT, must give effect to the densification of Yarralumla and Deakin in the Inner South District Strategies and therefore must result in changes to the zoning of these suburbs.

- Further zoning changes to give effect to the large scale densification of Yarralumla and Deakin proposed in the Inner South District Strategies is not supported due urban heat, loss of urban tree canopy cover to below 30% and the community's view that the character of these suburbs be retained.

4. Community Consultation has been inadequate and views not genuinely considered

There has been insufficient information provided on the complex suite of measures that comprise the new planning framework. The new measures are complex, there are a large number of interrelated components, and propose large scale changes to the nature of suburbs through densification and high density, high rise redevelopment.

The online materials and advice provided by the ACT Government for the public consultation process is often in conflict with the various elements themselves and can be misleading and misinterpreted.

The consultation on the New Planning Framework was scheduled to over the School Holiday and Christmas New Year holiday period 2022-23, thereby severely limiting the opportunity for community input.

Previous community feedback from the district planning consultation for Inner South District in 2021 was discounted and no changes made.

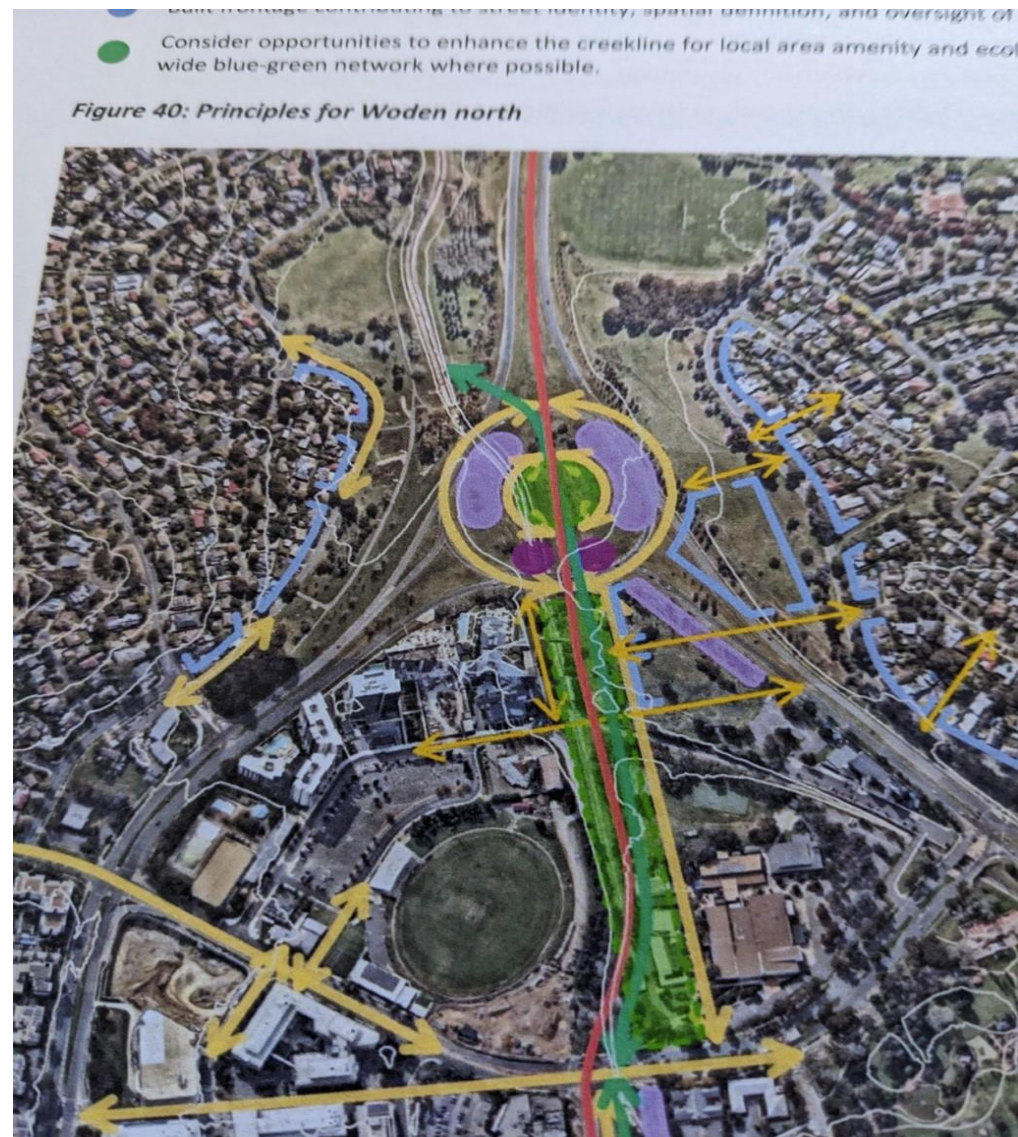
- Community consultation has not met good practice, and community views should be genuinely considered, comprehensively reflected in the new planning framework, including the Inner South District Strategy, and a further round of consultation undertaken.

Submission on Draft District Strategy: Woden 2022

I wish to comment specifically on page 121 of the Strategy and raise some serious concerns about the viability of the potential road joining Holman street to Theodore street.

The potential road is said to “clarify the urban edge” and “unlock sites for development”.

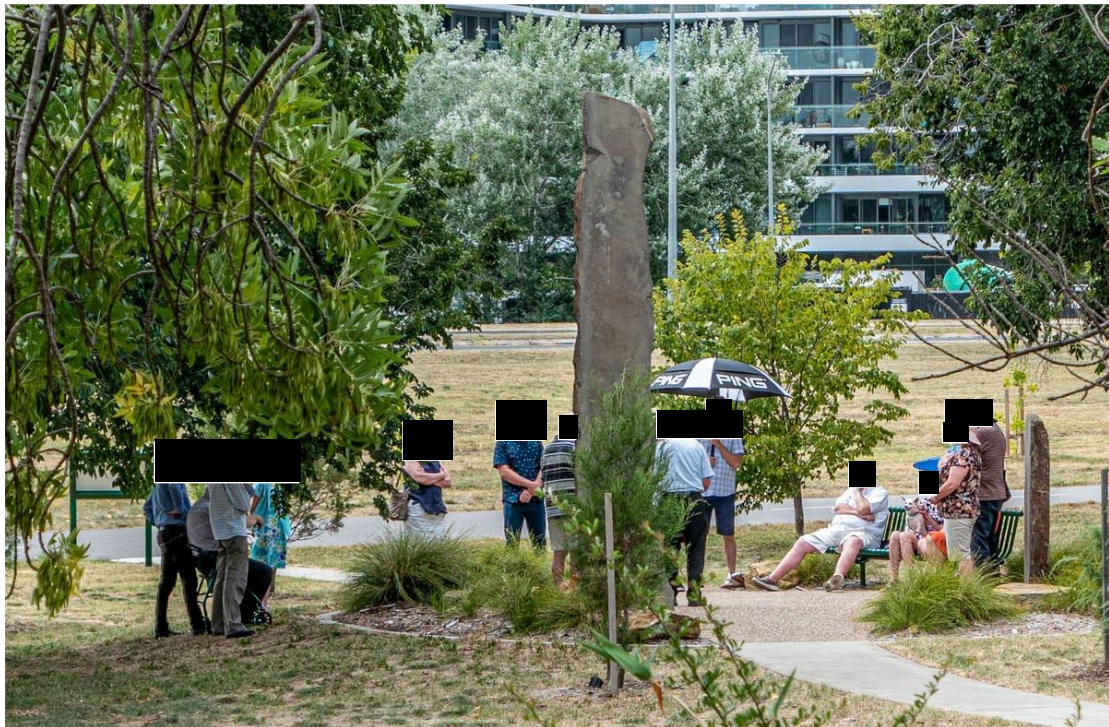
It would effectively duplicate the lightly-trafficked southern part of Holman street by running through a narrow, well used green corridor, along an existing part of Service street, then through another leafy green corridor to join Theodore street near its intersection with Melrose drive.



There appears to be several serious impediments to the proposal.

- The road would seriously impact the Woden Flood Memorial, which was erected some years ago to mark the catastrophic flood of Australia Day, 1971, which claimed the lives of seven young people. The road would be no more than a few meters from the monument, cut through the footpath which links the Memorial to Service street and necessitate the destruction of the two massive and shady oak trees which form the entrance to the Memorial area.

The Memorial site would no longer be a haven for quiet contemplation. It is frequently visited by the families of the victims and I am aware of the distress the proposal is causing them.



[redacted] leads a service for the families of the Woden flood victims.

26.01.2021



The Woden Flood memorial looking west to Service street. Photograph shows the short path that joins Service street and the two oak trees that provide shade and seclusion.



Looking east towards the Memorial from Service st. showing one of the Oak trees and its substantial shade footprint.



The approximate route of the proposed road to join Service st.

- The Rain Gardens

There are three rain gardens, completed in 2019, within 10 meters of the suburb boundary which would be impacted by the proposed road. The rain gardens were built to filter the runoff water from Curtin and send it into Yarralumla creek, the Molonglo, the Murrumbidgee and finally the Murray-Darling without the nutrients and pollutants of Suburbia. A road and associated road frontage would cut through the edges of the rain gardens, effectively rendering them useless. They are in the way.



The suburb edge showing the proximity of a rain garden



The road corridor is on the right and would impact the edge of the rain garden and the complex piping within it



A rain garden showing its proximity to nearby housing. The road would be on the right.

- Trees of significance, the loss of green space and heat from the road

The Strategy emphasises the need for numerous shady trees to help negate the effects of climate change yet this proposal would have quite the opposite effect. Already mentioned are the two big oak trees, but there are also numerous old, large eucalyptus trees that provide shade for the community that uses the green space.

Since the large blocks of flats were built on the eastern side of Melrose drive the residents have taken advantage of the pedestrian underpass to join the Curtin residents who already use the space in enjoying the green corridor along which the proposed road would run. It is the closest green space to them and they would be impacted as badly as the people of south-eastern Curtin if it were lost.

It goes without saying a bitumen road is very hot. Replacing a shady corridor, well-used by many people, with a road is in direct contradiction to the aim of the Strategy - to combat climate change and create a cooler precinct.



Numerous large eucalyptus along the proposed road corridor looking north from Theodore st.



Eucalypts on the proposed road corridor adjacent to the rain gardens



More shady trees of significance along the proposed road corridor

- In a flood zone

The area in question is, essentially, the Yarralumla creek flood plain. It is also the lowest part of Curtin and potentially subject to flooding from waters flowing from the more elevated parts of the suburb. In 2013 two downpours made the corner of Dry st and Service st become something of a lake. It seems certain the proposed road would be subject to flooding in the event of similar heavy rain events.



Corner of Dry st and Service st after rain, winter 2013.



Corner of Dry st and Service st after rain, summer of 2013. Here the water is over the curb and flowing into adjacent properties.

- Is the road needed anyway?

On 28/2/2023 during the afternoon “peak” I sat where the proposed road would join Holman st. During the half hour I was there (5pm to 5.30) only three cars drove past - and only one of them had joined Holman from Theodore. One vehicle in half an hour.

No matter how much infill takes place in the area it seems Holman has the capacity to carry the extra traffic generated.

As well, isn't the idea to get people out of their cars and walk the short distance to the light rail?

For these reasons I respectfully suggest the potential road is not needed, would be counter-productive to environmental aims, would necessitate the destruction of many shady, significant trees, would damage the rain gardens and cause distress to the families of the victims of the 1971 flood.

[REDACTED]

28/2/2023

To Whom it May Concern

DRAFT TERRITORY PLAN AND DISTRICT STRATEGY

I am fully supportive of the comments and recommendations submitted by the Inner-South Canberra Community Council (ISCCC) in response to the ACT Government's draft Territory Plan and District Strategy.

The following areas in particular, are of great concern to me and nearly all residents I have spoken to recently, namely;

1. The draft Territory Plan relies too much on subjective assessment. It should have clear, quantifiable outcomes measures. The government's definition: "Good outcomes that meet community needs" means very different and frequently conflicting things to different members of the community. The problems with the current planning system are not related to the existing quantifiable measures required to be met by new developments, but in the inability of the Planning area to accurately and consistently assess Development Applications against the criteria. This will only get worse under such subjective measures. In particular, there must be mandatory requirements for measures which protect the amenity of existing and future residents, such as access to sunlight/natural light, privacy, amount of planting area on residential blocks, building height, and protection of the character of heritage precincts. The idea that any of the houses surrounding my house could be knocked-down and rebuilt with a 3 storey development without me having an opportunity to provide comments is ludicrous.
2. The Government must show it evaluates and learns from the outcomes of past initiatives, including the Mr Fluffy program and the existing RZ2 zoning system. To put it mildly, some of the development approved under the Mr Fluffy program have been less than satisfactory for neighbours and the broader community.
<https://www.canberratimes.com.au/story/8096790/build-now-ask-later-approach-backfires-for-developer-and-neighbours/>
3. There must be an evidence-based, more rigorous methodology for projecting population increases in the ACT and hence the number of additional dwellings required annually, and where. After all, this is the justification for the significant changes proposed in the draft District Strategies. There also needs to be a lot more consideration given to the number and type of dwellings that currently exist in suburbs/districts and importantly, the capacity of suburbs/districts to support further

development and subsequent population increases not only in terms of infrastructure, but the availability and capacity to expand community and social facilities to promote sustainable and healthy living. Too much weight seems to be given to access to public transport in the draft District Strategies on the assumption that a majority of new residents will use public transport in years to come. This makes some sense along major routes between town centres but is unrealistic elsewhere. Again, the government should provide evidence-based analysis to inform the District Strategies, not ideological assumptions.

4. In addition, the Government must commit to well-structured, well-resourced and inclusive community-engagement and co-design process for the development of District Strategies. It is essential that this not just be another rubber-stamp process as has become the norm. The process of developing the Inner South, and other, District Strategies should provide for a further period of community engagement after the Planning Act and Territory Plan are finalised.


Griffith

DRAFT TERRITORY PLAN AND INNER SOUTH DISTRICT STRATEGY

DRAFT ISCCC RECOMMENDATIONS

DRAFT TERRITORY PLAN

Must be simpler and easier to use

- The Government's stated purpose for the planning reform is: "To deliver a planning system that is clear, easy to use and that facilitates the realisation of long-term aspirations for the growth and development of Canberra while maintaining its valued character".
- The draft Territory Plan and supporting documents do not meet the stated purpose of a clear and easy to use planning system. The multiplicity of documents and their complexity will make them difficult to understand, to administer and to evaluate. Radical surgery is needed to fix the problems.

Must demonstrate genuine commitment to an outcomes-based approach based on evidence

- If the Government is transforming the planning system by moving to an outcomes based approach, it should demonstrate its genuine commitment to that approach by showing that it is informed by evidence. This will contribute to confidence that as Canberra grows and develops, its valued character will be maintained.
- The draft Territory Plan relies too much on subjective assessment. It should have clear, quantifiable outcomes measures. The government's definition: "Good outcomes that meet community needs" means very different and frequently conflicting things to different members of the community.
- The ISCCC supports the Conservation Council's recommendation that research needs to be undertaken on the carrying capacity of the ACT to inform the Territory Plan and thus set meaningful population targets to live within our region's means.
- The Government must show it evaluates and learns from the outcomes of past initiatives, including by:

A. Evaluating the Mr Fluffy program which allowed for dual occupancies to be built on Mr Fluffy blocks bigger than 700 sq metres to learn lessons before any expansion of this model across Canberra. For example, how many of the blocks were actually turned into dual occupancies compared to new single dwellings? Did the redeveloped blocks provide at least 30 percent plantable area? Was there sufficient room for canopy trees to be planted? Did they protect neighbours' privacy and access to sunlight?

B. Evaluating the success of RZ2 zoning in providing medium density housing to learn lessons for the proposed further relaxation of requirements for multi-unit residential development near local and group centres.

Must provide greater clarity and certainty in decision-making on development applications (DAs)

- The Territory Plan must incorporate tighter definitions of desired outcomes, based on verifiable evidence and objective measures of compliance.
- Key mandatory DA assessment requirements from the Technical Specifications and other supporting material must be included in the Territory Plan, to enable Assembly and community oversight.
- In particular, there must be mandatory requirements for measures which protect the amenity of existing and future residents, such as access to sunlight/natural light, privacy, amount of planting area on residential blocks, building height, and protection of the character of heritage precincts. Residents have demanded a say on neighbouring knockdown rebuilds (in response to the ISCCC's online survey in 2019/20). These issues matter to people because they facilitate a liveable environment.
- The proposed Territory Plan does not provide for these key characteristics of a liveable environment, so the Government must make such key requirements of concern to residents mandatory and include them in the Territory Plan rather than in Technical Specifications and Design Guides which create uncertainty as to outcomes.
- The Living Infrastructure provisions which came into effect for established suburbs on 1 September 2022, and which are critical to climate change resilience, must not be watered down in the new Territory Plan. It seems, for example, from the Technical Specifications (page 5) that single dwelling residential blocks larger than 500 sq metres will only be required to have 24 percent plantable area on the whole block rather than 30 percent laid out in the Living Infrastructure provisions in the current Territory Plan. This seems to have been done by changing planting area to a percentage of private open space instead of the whole residential block.
- The proposed development assessment system should comply with nationally agreed benchmarks, namely the 'Development Assessment Forum' (DAF)'s 'A Leading Practice Model for Development Assessment in Australia'. Currently, it does not.
- As the Design Guides are not yet available, a period of at least four weeks for public comment should be allowed when they become available.
- The criteria for exemption from the requirement for a Development Application are not yet available. A period of at least four weeks for public comment should be allowed when they become available. As these criteria will comprise mandatory criteria, they must be included in the Territory Plan.

- Proposed changes to mandatory requirements in the Territory Plan should be treated as a major amendment, with appropriate notification to the Legislative Assembly and provision for the amendment to be disallowed if the Assembly considers that to be the appropriate action.
- An explicit requirement that DAs involving protected trees should be referred to the Conservator should be included as a mandatory Assessment Requirement in the Territory Plan (or as an amendment to the proposed Planning Act). Decision makers who decline to follow the Conservator's recommendation(s) should be required to give reasons for their decision.
- An explicit requirement that DAs involving heritage matters are to be referred to the Heritage Unit and Heritage Council should be included as a mandatory Assessment Requirement in the Territory Plan (or as an amendment to the proposed Planning Act). Decision makers who decline to follow the Heritage Council's recommendation(s) should be required to give reasons for their decision.
- The current Heritage rules must be maintained, and all development must preserve the built heritage, streetscape and character of heritage precincts. Property-buyers should be asked to sign a declaration that they are aware of heritage rules and will respect them.

DRAFT INNER SOUTH DISTRICT STRATEGY

- There must be an evidence-based, more rigorous methodology for projecting population increases in the ACT and hence the number of additional dwellings required annually, and where.
- A clearer evidence base is needed for the proposed Transect approach to Urban Character Types (eg General Urban, Urban Centre, Urban Core), and how it informs the building heights shown in the Sustainable Neighbourhoods maps, how it would interact with the zoning provisions in the Territory Plan, and how it will ensure resilience in the face of a warming climate, including through the provision of adequate green space and tree canopy cover to prevent heat islands. A regularly updated heat-map is required to provide evidence that developments do not lead to temperatures harmful to health.
- Instead of random upzoning in a district, it is preferable to have structured community engagement to ensure co-design of precinct scale developments, and then improvement of processes between participating Government agencies, the private sector and the community to deliver the redevelopment of precincts in a timely way.
- The ACT Government must use a genuine and well-structured, rather than "rubber stamp", community engagement and co-design approach on the district strategies, including by promoting the community engagement processes widely, at accessible times and places, with reasonable timeframes for comment, and by providing good quality, high resolution maps and other information to support the community in providing better informed

feedback. This is especially important in view of current community feelings of disempowerment and the experience of not being listened to.

- The Inner South Canberra Community Council's "Inner South Canberra District Planning Strategy - Future Directions for our District - 2021" is a thorough, locally-sensitive, attempt at a District Strategy. This should be drawn on more comprehensively in revising the Government District Strategy for the Inner South.
- The proposed District Strategy needs to better acknowledge and deal with heritage. Currently it seems to address heritage mainly under the Blue-Green Network under Conservation Connectivity. It is important to acknowledge and maintain built and cultural heritage, not just natural heritage. The Sustainable Neighbourhoods Section and map at Fig 36 need to clarify this.
- At the same time, the ISCCC supports the proposed initiative in the Blue Green network to protect and enhance the Jerrabomberra Wetlands Reserve, and the Jerrabomberra Creek corridor.
- We consider that the identified primary and secondary liveable blue-green network does not fully capture the high value biodiversity network in the inner south, and needs more work.
- The need for social housing to be included in new developments is important in the Inner South. For example, this should be included in the list of principles for planning East Lake (p121 of the draft Inner South District Strategy).
- Oaks Estate residents have asked that the suburb be included in the Inner South District Strategy, not in the East Canberra District Strategy as currently proposed.
- Greater consideration needs to be given to the future of the Canberra Railway Station.
- More work needs to be done to identify ways of improving transport access by making it easier for people to get around by car, by public transport or by active travel.

The Process from here

- Once comments received have been incorporated, the next version of the Planning Act and Territory Plan and associated documents should, as a package, be released for final public comment before they are finalised.
- The process of developing the Inner South, and other, District Strategies should provide for a further period of community engagement after the Planning Act and Territory Plan are finalised.

- The ISCCC recommends that the government seek advice on the risks of moving to discretionary decision making, as inevitably there will be merits and judicial review. The likely monetary and social risks are a consideration that has not been discussed.