

Director-General

Environment, Planning and Sustainable Development Directorate

ACT Government

**Submission: Draft Woden District Strategy**

My first point relates to ACT population projections. While the ACT government operates as if rapid population increase is a given, it is primarily the product of Federal government policy. In particular it is the result of high net rates of migration. While the majority of Australians, and I suspect Canberrans, do not want rapid population growth and a 'Big Australia', this is being foisted upon us.

The 2022 national State of the Environment report made clear that increasing economic growth and population growth were major drivers of environmental damage. Population size is multiplier of environmental damage. Because humanity in the ACT, nationally and globally are degrading the natural environment rapidly, a range of environmental crises, including but not limited to climate change, pose existential threats to our civilisation this century. Our services and infrastructure cannot keep up with this rapid population growth, diminishing the wellbeing and quality of living for many Australians.

While the population pressures generated in the ACT are driven by Commonwealth policy, the ACT government should be recognising the problems this policy causes and working with other jurisdictions against this growth. This population pressure is taken as an unquestioned given and drives planning strategies and decisions, but the impacts should be clearly stated. Canberrans are being forced against our wishes to live in an ever-bigger city.

My other points relate to the strategy's vision for my suburb of Curtin, and particularly southern Curtin. The impression I get is that southern Curtin is being seen as an extension of the densification of the Woden area. If this is the case, I am strongly opposed to this due to the effects it will have on the amenity of this attractive suburb, and the pressures it will place on road infrastructure here.

Related to this is the proposal to build a road on the eastern side of Curtin. I am both perplexed and angered by this proposal. The rationale is some completely untransparent terminology about '(clarifying) the urban edge to Yarra Glen'. What does that mean? The purpose of this proposed road should be clear in the document and it is not. Is it to facilitate densification and new housing along the creek corridor? If so, that is completely unacceptable. We have already had the NCA impose urbanisation and loss of green space upon us through its alienation of the North Curtin horse paddocks.

Yours sincerely



2 march 2023

The current changes in the ACT's planning legislation regarding the Yarralumla Creek corridor go against the stated aims of making a sustainable and liveable Curtin.

**The Yarralumla creek corridor must be preserved and enhanced.** The corridor provides an amenity for the whole community. There are beautiful and old growth trees which assist in reducing urban heat. The area is valuable for its cycle path and green spaces and is used as a walking path. A road would destroy the area for no benefit.

These green spaces in the older suburbs of Canberra are very valuable and part of the original plan for the city. Curtin is beautifully designed and the green spaces and walking paths are used by the community. The children walk to school through them and cycle along the bike paths. To destroy them is a loss for future generations and a loss to the city.

The edge of Curtin is well defined by the stormwater drain. A road is not necessary. A new street crossing Yarralumla creek is not acceptable as it will degrade the corridor.

The part of Curtin near the roundabout at the intersection of Yarra Glen, Yamba and Melrose drive is a very hot space and very noisy. It is the last place you would want to build shops and cafes. In the summer it is extremely hot because there is no tree cover and the road makes it a heat island.

The Yarralumla creek corridor should be enhanced and could then be used by residents on either side of the Creek if the horse paddocks in the north of the suburb are developed. It could become a beautiful park and this would enhance the value of new dwellings in the horse paddocks. This development could be serviced by a road from Throssel St.

**The new edge street along the Yarralumlae must not go ahead.**

I support the restoration of natural environments along Yarralumla Creek as part of an enhanced blue-green connection.

[REDACTED]

Curtin, ACT, 2605

## Submission concerning the Draft Inner South District Strategy

In general terms, as it relates to the overarching planning framework, our view is that the 'outcomes-based' approach subjects developers to less restriction and greater flexibility with less scrutiny than the current approach. There is little avenue for anyone adversely impacted by inappropriate development to exert any real influence, and no impartial arbiter to make balanced decisions. Bodies such as ACAT seem to only examine adherence with rules, and, with the proposed replacement of rules with nebulous outcomes, even that already problematic path for existing residents to have their grievances considered would become futile.

We also wish to provide comment on some specific contradictions, omissions and inadequacies in the Draft Inner South District Strategy, in general terms as well as specifically as it relates to Section 19 Forrest on page 118 of the draft.

Firstly, what are listed as the key principles for development on Section 19 Forrest are not key principles at all, they are merely minor elements of planning guidance for the proposed development that would make a small reduction in the negative impacts of the development on the surrounding area and the nearby residents. The principles that would have a genuine impact are building height and site density. Other things that nearby residents and others using the area value are solar access, minimising traffic congestion, minimising noise and preservation of the "Garden City" concept. All of these factors are largely driven by building height and site density, so ensuring clarity on these aspects would go a long way to providing certainty for residents and developers.

The specific concern about Section 19 Forrest is that the CZ5 proposed zoning places no height limit on the proposed development, prompting development applications for excessively tall buildings that seek to maximise developer profits over any other consideration. An example of this is the now lapsed proposal to build a 7-storey hotel on the former Italo-Australian Club site, completely at odds with the suburban context and considerably taller than any existing buildings nearby (having two sides flanked by one or two storey homes/townhouses, the third facing a 4 storey office and the last a 2 storey cultural centre).

In addition, the change of zoning proposed for the Albany apartments and the Blandford apartments is radical: going from RZ1 restricted to 2 storeys to CZ5 with no specific height limit. Owners such as ourselves purchased properties opposite these blocks with the understanding (as used to be the case) that RZ1 was only rezoned in exceptional circumstances, and that there was some surety of retaining the privacy, solar access, traffic and other noise and outlook from the development opposite remaining at its current height (even if redeveloped). The new planning arrangements and the proposal clearly reverse this.

While, by the width of National Circuit, Section 19 Forrest falls outside of NCA jurisdiction, clearly it would be inappropriate to have a radically different streetscape with prominent high-rise buildings bordering the NCA areas, impacting the vista from Parliament House. Similarly, the NCA has height restrictions for development on Canberra Avenue to preserve an appropriate vista from Parliament House down the avenue. Again, having high-rise only one block back from Canberra Avenue would significantly impact this and operate squarely against the spirit of the NCA development restrictions.

It should be noted that, even in the newer suburbs such as those in the Molonglo Valley, and in Gunghalin, high-rise development is restricted to the major transport corridors, with building height stepping down from 6 or more floors on the main routes, to 3 or 4 adjoining, to 2 in the broader suburb.

This should be a principle applied universally across Canberra, and particularly to Section 19 Forrest, where any other alternative would not only impact on the Garden City model for the suburb (much of which is heritage listed), but also adversely impact the view from Parliament House.

It should be noted that the other areas of proposed high-rise development in the Draft Inner South District Strategy are all adjoining shopping centres. This is not the case with Section 19: it is over 600m from any shops, with the area between the shops and Section 19 taken up with one or two storey dwellings/townhouses. Similarly, it is at odds with proximity to the proposed light rail, as it will be hundreds of metres from any stop.

Dominion Circuit is not a particularly wide street, and is heavily used for parking by workers from nearby office buildings, forcing cars to pass close to or over the centre line to pass the parked cars. It is already increasingly being used as an alternative to the congested Canberra Avenue with cars travelling through the suburb as an alternative. Dense development on Section 19 would worsen an already significant problem, and arguably create a more dangerous traffic issue.

The redevelopment of the Italo-Australian club site will remove many parking spaces, forcing even more cars into off-street parking. The addition of extra traffic if there is high-rise development on Section 19 would make this considerably worse, even with the proposed 'principle' of no new vehicle access from Block 9 of Section 19.

In summary, all of this can, and should, be addressed by applying, as a key principle, building height restrictions stepping down from the 4 storeys on Canberra Avenue, to 3 storeys adjoining (ie Blocks 9 and 12) to 2 storeys on Blocks 5, 6 and 11 in Section 19. By doing this, it would provide certainty both to residents and developers, and deliver development compatible with the existing suburban context.

We note that the 'unlimited height' dimension of the Section 19 Forrest proposal is at odds with a number of the overarching Territory Plan Planning Principles (at Part C), specifically that:

- 2.1 (e) Policies should support and enhance the quality of life and wellbeing of residents.
- 2.2 (a) Planning and design should promote the unique cultural heritage of the ACT by  
acknowledging established heritage significance in design and placemaking.
- (b) Development should—
  - (i) respect local heritage
  - (ii) avoid direct impacts on heritage or, if a direct impact is unavoidable, ensure the impact is justifiable and proportionate.
- 2.3 (a) Development should be focused on people and designed to—
  - (i) reflect local setting and context

(ii) have a distinctive identity that responds to the existing character of its locality

We further note that the proposal contradicts Chief Minister Barr's specific comments from July 2022, where he stated:

*"The answer is not just more 10-storey apartments in town centres and CBDs, although there's still a little bit more capacity and demand for them, but the bulk of the new housing will be in what I'd call that middle sphere. So lower-density apartments, more like walk-up two- and three-storey and in townhouses, row houses, duplexes, that sort of housing density."*

This proposal and suggested design does not meet the ACT's own key criteria and building codes, and provides a lazy precedent for any further developments. I am directly affected by this proposal. It is obvious that this proposal is completely out of character to the existing streetscape within adjacent blocks. The change in zoning does nothing to ensure the integrity of the key objectives listed within CZ6 to protect the amenity of residential areas or ensure that the bulk, scale, size, design and landscaping of any development is compatible with the surrounding landscape.

I quite understand that the area will be developed – and recognise that developers need to make a reasonable return on investment. However, this should not occur outside of the reasonable guidelines that are relied upon by ACT residents and that have been laid down in policy and reiterated most recently by the ACT Chief Minister.

We ask that you consider this as a key input to your review of the planning documentation.

Regards

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## **RECREATIONAL FACILITIES IN WESTON CREEK**

The mental health and wellbeing of people, particularly young people, is becoming more concerning to our community. This is especially so after the impacts of Covid, increasing life expectancies and equality of opportunity for all. Recreation and exercise play a vital role in maintaining the mental health and wellbeing of our Community.

In Weston Creek we have a small business, the Woden Valley Gymnastics Club (WVGC), which has over 70 employees. This provides programs for people aged from 9 months (kindergym) to 80 years (Groove and Move and Adult Gym) as well as the many diverse branches of gymnastics. Currently we have more than 1500 members drawn from Weston Creek but also increasingly from Molonglo, plus some members as from as far away as Jerrabomberra and other areas of Canberra.

The Club is continually oversubscribed with waiting lists of over 100 and many inquiries that cannot be accommodated simply due to a lack of facilities, time and room at the current Mulley Street, Holder, Gymnasium.

We believe another indoor facility of approx. 600 square metres to 800 square metres would be of benefit to many within the Weston Creek / Molonglo / Woden Valley community.

This could be built in a number of ways:

1. As an added facility for WVGC which would be quickly filled with gymnasts and programs for the Community.
2. As a Community resource able to be used by the Gymnastics Club plus other Weston Creek recreation classes e.g. yoga, dance, fitness, diverse groups, specialised groups.

A suitable area is available in the grounds of the previous Holder High School – particularly to the north of the current gymnasium, on the disused tennis courts, on the area behind these courts. This is already ACT Government land.

As we see a growing incidence of stress related health conditions, obesity, declining activity levels in our children and sedentary health conditions we urge the ACT Government to be proactive in addressing these concerns by providing appropriate facilities for the people of the ACT.

The Planning Bill addresses many concerns about bricks and mortar plus the external environment. The mental health and wellbeing of ACT residents and sense of Community is, I believe, equally or more important and hence I urge you to act on developing more recreational facilities in Weston Creek / Molonglo / Woden Valley for all residents (including rate payers) of the ACT.

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

Submission by [REDACTED]  
[REDACTED]  
[REDACTED]

## Response to the ACT Government's New Planning Framework - including the Inner South District Strategy for the suburbs of Yarralumla and Deakin

I am extremely concerned about the New Planning Framework.

It does not adhere to the concept of Australia's bush capital, and destroys the resilience and sustainability that was originally introduced in the planning of Canberra. I am very concerned that the south side - which has not had the same degree of investment by the government, will become overdeveloped, losing the characteristics that make Yarralumla special, and also our existing school (Canberra Girls Grammar School, primary campus) [REDACTED]. It is deeply concerning to me, that the whole process appears very rushed - and totally favours the developers, with no checks and balances by the very people who will be most affected, those who live here. Not only are our the highest in Australia (I checked - even if I doubled the value of my property, by shifting it to Toorak, Melbourne we would still pay less - and we wouldn't have to battle for property rights), but we are going to end up paying likely in-excess of double of what was originally budgeted for this, as the cost of everything has doubled. My pay hasn't. Your costly, plan will not benefit the people who live here, and will destroy what vestigates of nature we have left. It is disgraceful the way that the people of the "Mr Fluffy" Saga were treated. You kicked them out of their own homes, and the 'market rate' you paid, vanished so fast, those poor people couldn't buy similar homes in their own areas. Is that going to be the fate of people in the path of the light rail, and 'infill'?

In addition, your plans do not protect the valuable farm land that we have in the ACT. The rights of farmers is being eroded to appease the fantasy of some futurists, who imagine us living in rows of flats, and all attending the same offices somewhere down town, or all going to same spots matches, and heading of to Woden. My family and I rarely go into Civic and Woden - there is little there that interests us.

There is so much that can be done to improve the environment, and transport in Canberra, without resorting to the destruction of the existing culture and environment. It is frustrating when I see a plan created that appears totally at odds with the wishes of people who are living here (not university students who are lucky if they stay 3 years), but families, and in return gives open slather to developers to turn our area into a concrete slab - no trees, or families, or pets (except a tiny dog trapped in a flat!), no one working in their shed (you have to go to a group 'man shed'!), no gardens (you can join the communal gardens) - I think we have been taken over by a regime that leaves a very unsavory feeling in the pit of my stomach. I say NO to the new planning framework.

Dear ACT Planning,

I am the owner of [REDACTED] in Curtin, and enclose my neighbour's submission which I support.

Regards,

[REDACTED]

2 March 2023



### GENERALLY

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

### POPULATION

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

### TOWN CENTRE CREEPING NORTHWARDS

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

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

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<sup>1</sup> P 33

<sup>2</sup> P 97

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

### DENSITY & ZONING

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

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

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

### RIPARIAN CORRIDOR

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

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

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<sup>3</sup> P126-127

<sup>4</sup> p99

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

3. The ACT has its own Codes on Water Sensitive Urban Design<sup>5</sup>. They are referenced in the Strategy<sup>6</sup>. Any suggestion of development within the existing green corridor where the creek is located would be contrary to the principles set out in the Code.

#### EDGE STREETS / WALKABLE STREET GRIDS

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

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

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

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

[REDACTED]

[REDACTED]

1 March 2023

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<sup>5</sup> [https://www.environment.act.gov.au/water/water-strategies-and-plans/water\\_sensitive\\_urban\\_design](https://www.environment.act.gov.au/water/water-strategies-and-plans/water_sensitive_urban_design)

<sup>6</sup> P127

<sup>7</sup> P 121

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

### **"It's the Vibe"**

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

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

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

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

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

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



Submission by [REDACTED]  
[REDACTED]

on the ACT Government's New Planning Framework

I am very concerned by the ACT government's lack of consultation, particularly with respect to young people. Many of us will be voting in the next election, and yet we have no choice, over a major change that will be imposed upon on, and for many, change our whole lifestyle, to the detriment. I am very concerned that the engineers and builders who work on this, will not produce quality, or indeed reflect an optimal outcome at all. I was fortunate to recently have been at a major engineering firm, that will be providing much of the planning and infrastructure for the planned change. They were not diverse. They said that they hoped one day that they might have as much as 30% females. As a young female, who hopes to make change in the world for good, to say I felt gutted by this company's attitude is an understatement. How can you guarantee diversity in your planning and approach?

There is no chance, that this type of company are going to be able to provide an optimal plan for the future. There is no way that they have the insight, knowledge, and collaboration that is needed when working with a diverse - truly diverse set of people, who can reflect what Canberra is. Indeed, all those engineers seemed to be interested in was the destruction of Canberra, the destruction of the trees, and the creation of a concrete jungle. Have the traditional owners of the land been consulted? Will there be discussion with people who live in Yarralumla? What about our remnant ecology? Who are the engineers and builders for the flats - are they this same group of people who made all the poorly built flats in Canberra, or the ones who killed the young apprentice builder? I don't want to live in Sydney, and I don't want my home, Yarralumla turned into Parramatta by the lake. A concrete desert. I say no to the ACT Government's New Planning Framework, the Tram, and the proposed densification of my lovely suburb, where I was born, and where I wish to stay.

## **Submission on Draft Woden District Strategy – Curtin Edge proposal**

I wish to voice strong opposition to the proposal for a Curtin edge north and south.

A new edge street through the Yarralumla Creek corridor is not acceptable as it would destroy the amenity this treed open space provides for the community. The current corridor defines the urban edge perfectly well and the proposed street would significantly degrade the blue-green connection of the Yarralumla Creek corridor. Losing trees, including those planted recently by the ACT Government, would increase the “heat island” effect for this part of Curtin, which is not acceptable. Continuing to increase the number of trees, together with retaining the open green space, would be a better blue-green enhancement.

Separate pedestrian and cyclist paths for active travel are needed rather than new streets.

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

The proposal is an attack on residential urban amenity and local wildlife, and should be rejected.

██████████



**Draft Territory and District Plans:** comments from [REDACTED]

It appears that under the suggested new arrangements that the government will not be following the sound development practices that were drawn up in 1998.

Without such guidelines it appears that Rafferty's Rules may apply.

Densification through high rise buildings seems likely to contribute to climate change issues – fewer trees and green spaces, plus no solar panels. Some infill may be necessary, achieved by relaxation of dual occupancy rules, but not high rise apartments.

Some suburbs in the inner south (and perhaps elsewhere) already have plans for high density areas, without the additional areas envisioned on this new colour coded map.

28 February 2023

## **Draft Woden Valley district planning strategy—submission**

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### **What residents value**

Your statement in the summary of ‘What residents value’ does not mention the gardens and trees in private houses, a major factor in the amenity of the area and reliant on having enough open space around houses.

### **Future directions: 5 big drivers**

‘Strategic movement to support city growth’ presumes that we want the city to grow, and so conflicts with features of the city that appeal to residents. Also, if light rail is to be the central spine of the public transport network, what branches off it along the route? It’s not a spine if it only goes along a single unbranching route.

### **Sustainable neighbourhoods**

What is urban transformation and how does it coexist with existing desirable housing assets? It is not defined in your document. The term implies improvement, but your proposals do not improve our urban amenity.

### **Support city growth**

Why? Have you considered the option of having a sustainable city, ie the size it is without growth? Have you considered ways to restrict the growth of the city?

World population is predicted to stabilise and then decline in a few decades. Even without that, the notion of constant growth by population increase is doomed to catastrophe. Better to stabilise our population and deal now with the issues that entails.

A city that keeps growing is not sustainable. Why wait until it is too large before acting? A planning process needs to protect what we value about the city, not just give an excuse for developers to profit and destroy our amenity.

Your projection of the growth of population in Woden (ie plus 2 500 by 2063) needs to take into account that there are many single resident houses that will be available for multi-resident families by then, and not require any extra development. I assume the newer suburbs will take up the greater number of single resident houses or flats by then.

### **Sustainable neighbourhoods**

‘celebrating existing leafy areas’, ‘achieve improved tree canopy cover’: much of this is in private gardens, which will disappear if taken over by flats or 2 for 1 developments with minimal surrounding land.

Increasing urban density in single residence areas destroys the amenity of residents who have gardens that contribute to green space and provide havens for wildlife (including insects). Native species don’t know to restrict themselves to reserved spaces. They live throughout the city where they can. Reducing availability of garden space reduces their habitat, however many street trees you plant. You can’t achieve a garden city character by removing the possibility for dwellings to have gardens.

## **Curtin edge**

Does this mean building on flood-prone land? And removing the vegetation and wildlife corridor along Yarralumla Creek? Can we not return the creek to its natural state and remove all the concrete? An occasional flood, that does not affect housing, is a small price for a blue-green outcome. 'A new edge street to clarify the urban edge to Yarra Glen.' What is that supposed to mean? Has anyone asked what is the urban edge to Yarra Glen? Anyone would answer that it is the houses to the west of the creek, and not any new development. Or do you just mean putting more buildings in a blue green corridor?

What happens to the shared path along the creek if there is a road and buildings there? What happens to the green buffer from traffic noise and pollution from the road? This is exactly the kind of overdevelopment that contradicts all the flowery language you use about a sustainable city.

You cannot 'enhance the creek line for local area and ecology' by adding roads and buildings. Is this just a proposal that is inserted so people will feel satisfied when it is withdrawn, and accept everything else?

## **Increased tree planting**

This is incompatible with allowing buildings to have footprints that cover most of their block. Current building approvals means there will never be any large trees on new residential blocks, or those that have 2 dwellings on a former single dwelling block. You are creating deserts that are not rectified by street trees or offsets alone.

## **Transport issues**

Cycle paths are mostly meandering badly maintained tracks for touring, not for everyday use. And on-road cycle lanes are ridiculous. In many places they stop or start in arbitrary places, leaving the cyclist forced to take up a road lane (and be abused by car drivers) or risk being swiped by vehicles. You are not going to encourage people out of their cars if you do not address these issues.

Road size needs to be reduced to reduce the incentive to drive passenger cars, and to encourage active travel. We need to develop a different paradigm for personal transport. Single family vehicles, usually single occupant, are not part of a sustainable Canberra. To date, traffic density has been addressed by giving in to the car and truck. That needs to stop. Traffic always increases to fill, or overfill, the carrying capacity provided, so dealing with congestion by building more or better roads just makes the problem worse.

You need to make a serious effort to find out what will get people out of their cars. Just providing better cycle paths (please do that anyway) and light rail does not convince people not to have cars.

## **Summary**

You go on about liveable Canberra. What makes it liveable is the space, and the lack of overdevelopment, that this plan proposes to ignore. An internal contradiction.

If you are really committed to a liveable and sustainable city, you should be finding out what will make people leave their cars behind, and establishing a limit to the growth of the city before it becomes unliveable.

  
2 March 2023

## Submission concerning the Draft Inner South District Strategy

In general terms, as it relates to the overarching planning framework, our view is that the 'Outcomes-based' approach seems to subject developers to less restriction and greater flexibility with less scrutiny than the current approach. There also seems to be little avenue for anyone adversely impacted by inappropriate development to exert any influence, and no impartial arbiter to make balanced decisions. Bodies such as ACAT seem to only examine adherence with rules, and, with the proposed replacement of rules with nebulous outcomes, even that already problematic path for existing residents to have their grievances considered would become futile.

We also wish to provide comment on some specific contradictions, omissions and inadequacies in the Draft Inner South District Strategy, in general terms as well as specifically as relates to Section 19 Forrest on page 118 of the draft.

Firstly, what are listed the key principles for development on Section 19 Forrest are not key principles at all, they are merely minor elements of planning guidance for the proposed development that would make a small reduction in the negative impacts of the development on the surrounding area and the nearby residents. The principles that would have a genuine impact are building height and site density. Other things that nearby residents and others using the area value are solar access, minimising traffic congestion, minimising noise and preservation of the "Garden City" concept. All of these factors are largely driven by building height and site density, so ensuring clarity on these aspects would go a long way to providing certainty for both residents and developers.

The specific concern about Section 19 Forrest is that the CZ5 proposed zoning places no height limit on the proposed development, prompting development applications for excessively tall buildings that seek to maximise developer profits over any other consideration. An example of this is the now lapsed proposal to build a 7-storey hotel on the former Italo-Australian Club site, completely at odds with the suburban context and considerably taller than any existing buildings nearby (having two sides flanked by one or two storey homes/townhouses, the third facing a 4 storey office and the last a 2 storey cultural centre).

In addition, the change of zoning proposed for the Albany apartments and the Blandford apartments is radical: going from RZ1 restricted to 2 storeys to CZ5 with no specific height limit. Owners such as ourselves purchased properties opposite these blocks with the understanding (as used to be the case) that RZ1 was only rezoned in exceptional circumstances, and that there was some surety of retaining the privacy, solar access, traffic and other noise and outlook from the development opposite remaining at its current height (even if redeveloped). The new planning arrangements and the proposal clearly reverse this.

While, by the width of National Circuit to the north and Franklin Street to the East, Section 19 Forrest falls outside of NCA jurisdiction, clearly it would be inappropriate to have a radically different streetscape with prominent high-rise buildings bordering the NCA areas, impacting the vista from Parliament House. Similarly, the NCA has height restrictions for development on Canberra Avenue to preserve an appropriate vista from Parliament House down the avenue. Again, having high-rise only one block back from Canberra Avenue would impact this significantly and would operate squarely against the spirit of the NCA development restrictions.

National Circuit also has the Forrest Primary School very close to the proposed Section 19 development, and there would be significantly increased danger to the children from increased traffic from a significant increase in population density.

It should be noted that, even in the newer suburbs such as those in the Molonglo Valley and in Gunghalin, high-rise development is restricted to the major transport corridors, with building height stepping down from 6 or more floors on the main routes, to 3 or 4 adjoining, to 2 in the broader suburb.

This should be a principle applied universally across Canberra, and particularly to Section 19 Forrest, where any other alternative would not only impact on the Garden City model for the suburb (much of which is heritage listed), but also adversely impact the view from Parliament House.

It should also be noted that the other areas of proposed high-rise development in the Draft Inner South District Strategy are all adjoining shopping centres. This is not the case with Section 19: it is several hundred metres from any shops, with the area between the shops and Section 19 taken up with one or two storey dwellings/townhouses. Similarly, it is at odds with proximity to the proposed light rail, as it will also be at least a couple of hundred meters from any stop.

Neither National Circuit nor Dominion Circuit are particularly wide streets, and both are heavily used already for parking by workers from nearby office buildings, forcing cars close to or over the centre lines to pass. They are already increasingly being used as an alternative to the congested Canberra Avenue with cars travelling through the suburb as an alternative. Dense development on Section 19 would worsen an already significant problem.

The redevelopment of the Italo-Australian club site will remove roughly 200 parking spaces, forcing even more cars into off-street parking. The addition of extra traffic if there is high-rise development on Section 19 would make this considerably worse, even with the proposed 'principle' of no new vehicle access from Block 9 of Section 19 to Dominion Circuit.

In summary, all of this can, and should, be addressed by applying, as a key principle, building height restrictions stepping down from the 4 storeys on Canberra Avenue, to 3 storeys adjoining (ie Blocks 9 and 12) to 2 storeys on Blocks 5, 6 and 11 in Section 19. By doing this, it would provide certainty both to residents and developers, and deliver development compatible with the existing suburban context.

We note that the 'unlimited height' dimension of the Section 19 Forrest proposal is at odds with a number of the overarching Territory Plan Planning Principles (at Part C), specifically that:

- 2.1 (e) Policies should support and enhance the quality of life and wellbeing of residents.
- 2.2 (a) Planning and design should promote the unique cultural heritage of the ACT by
  - acknowledging established heritage significance in design and placemaking.
- (b) Development should—
  - (i) respect local heritage
  - (ii) avoid direct impacts on heritage or, if a direct impact is unavoidable, ensure the impact is justifiable and proportionate.

2.3 (a) Development should be focussed on people and designed to—

(i) reflect local setting and context

(ii) have a distinctive identity that responds to the existing character of its locality

We further note that the proposal also contradicts Chief Minister Barr's specific comments from July 2022, where he stated:

"The answer is not just more 10-storey apartments in town centres and CBDs, although there's still a little bit more capacity and demand for them, but the bulk of the new housing will be in what I'd call that middle sphere. So lower-density apartments, more like walk-up two- and three-storey and in townhouses, row houses, duplexes, that sort of housing density."

We ask that you consider this as a key input to your review of the planning documentation.

Regards

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

## **Re: Response to the draft Inner North and City (IN&C) District Strategy and proposed new Territory Plan.**

I have kept my comments brief and hope that brevity hasn't reduced clarity.

### *1. What is the vision the City?*

This is key to all other planning decisions.

If we want a space where people reside—and there are lot of apartments going up—then how do we protect green space and other amenities that make the city an attractive place to live? How do we make it fit for the future?

Certainly, the loss of Civic Pool, talk of an 'entertainment hub' and the segmenting of the city as it becomes a 'multi-modal transport hub' will work against this aim. It is likely to make the city a place to visit, rather than a place to live.

State the vision clearly and make sure that what you plan supports that vision. You can't have it both ways.

### *2. Look at things holistically*

The reduction in set-backs, the reluctance to plant large shade trees (crepe mytles don't count) and the increased use of hard surfaces is making Canberra hotter.

If you want people to walk more, rather than drive, then they need shade.

If you want people to be fitter, then they need spaces like the Civic Pool.

Reducing the requirement for car-parks in developments will mean problem parking on the street, with more complaints.

### *3. Consult meaningfully.*

The consultation period is too short. The documents are too long. They are repetitive. The maps, which are critical to understanding your development intentions, are unreadable.

The pop-up consultation in the Canberra Centre was disappointing. No maps, no planners and two people, albeit very pleasant, trying to scribble down comments on bits of paper. Insulting when residents have taken time to read and consider your documents.

### *4. What's wrong with rules and criteria?*

Rules and criteria make it clear to everyone what is expected. And outcomes can only be judged after the fact; far too late to alter a poor outcome.

This is even more concerning when power is concentrated and appeals are reduced. This is a worrying proposal in a democratic society.

#### 5. *Lack of honesty equals tricky behaviour*

Redefining parts of Reid as 'city' seems a deliberate strategy intended to reduce protection from development.

'Future investigation areas' (including all residential leaseholds between Amaroo and Booroondara Streets, Argyle Square and the Monterey residential developments) would allow for urban centre development up to 6 stories high, including commercial offices at ground level. A bonanza for developers and a disaster for residents.

#### 6. *Planning for the future means retaining space*

It means keeping Civic Pool. This hasn't been listed as an amenity. Rather, it is currently being promoted by business leaders as a future stadium site with commercial opportunities.

It means retaining sites that are designated 'community use' for that purpose and resisting pressure from sporting clubs, and others, to commercialise this land.

It means not allowing people to change the use eg put a carpark on public land and then, in time, argue to change the use to build there.

#### 7. *Quality building*

If you want people to take pride in where they live, there needs to be a cohesive, quality approach to the built environment. This has not been the case in the ACT so far.

By any standards, the office buildings and blocks of apartments are not interesting, innovative or inspiring. They are generally not well built. The reduced set-backs proposed will only make this worse.

The sale of the CIT site to the UNSW, whose plans include minimal green space, is a lost opportunity to do something more inspirational and attractive. This is also the case with the developments on either side of Cooyong and Ainslie Avenue. These buildings should have been iconic—the gateway to Ainslie Avenue with a view to Mount Ainslie. Instead they are magnet for short-term rentals and abandoned shopping trolleys.

#### 8. *Heritage*

There is little reference to Canberra as 'the bush capital', to the 'garden city ideal' of Walter Burley Griffin, and to ways in which heritage areas will be protected from development, increased traffic and noise.

██████████  
Reid



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

2 March 2023

Director-General, Environment,  
Planning and Sustainable Development Directorate  
ACT Government

**SUBMISSION: Draft Woden District Strategy**

I have many concerns about the Draft Strategy, particularly those impacting the suburb of Curtin, where I have been resident for more than twenty years. It is disappointing that this strategy is full of vague planning jargon and mud maps. It is not a suitable document for public consultation.

Overall, I am not opposed to increasing the residential density in some suburban areas of Curtin provided it is done sensitively and does not unduly impact on existing residents and on the amenity of the suburb. Attached is my submissions with detailed comments on elements of the plan that I support and object to.

I trust that these comments will be seriously considered in future planning documents.

Yours sincerely

[REDACTED]

## **SUBMISSION: Draft Woden District Strategy**

### **General comments**

#### **More dwellings in residential zones**

More dwellings in residential zones (densification) must not be at the expense of the community's health and wellbeing. A critical test for any proposed densification must be 'no adverse impact on the health and wellbeing of existing and future residents. The proposed new Territory Plan and Draft Woden District Strategy fail this test as they would exacerbate urban heat, which will decrease health and wellbeing. More dwellings in residential zones must aim to maintain sufficient areas of public and private open space and tree canopy cover for both human wellbeing and for wildlife, especially birds. The proposed high density development and 'pocket parks' would not provide sufficient space for people, wildlife and conservation corridors. 40% of private blocks must be soft planting area with 30%–40% tree canopy cover on each block.

#### **High density urban areas are hot spots**

An overarching objective for the Territory Plan and the District Strategies must be to adapt the urban environment for climate change and to reduce its effects such as increased heat. High-level policy statements, implementation mechanisms, such as the technical specifications in the draft Territory Plan, fall short of what is needed. Technical specifications for adapting to and reducing the impact of climate change are critically important: 40% of residential blocks must be soft planting area with 30%–40% tree canopy cover; buildings in residential zones RZ1, RZ2, RZ3 and RZ4 must be no more than 4 storeys, preferably less, to enable cooling by trees.

#### **Subdivision of residential blocks (Dual Occupancy Developments)**

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

#### **Key site and change area: Former Curtin horse paddocks**

This is a greenfield site. Any development must reduce the impact of climate change: there must be a significant amount of treed public open space; 40% of residential blocks must be soft planting with 30%–40% tree canopy cover on each block; buildings. A bridge for pedestrians and cyclists over Yarralumla Creek is essential to connect this new residential area with the rest of Curtin and open the north side of the Creek to recreational use by the community.

#### **Yarralumla Creek and Canberra's 'blue-green network'**

I welcome restoring natural environments along Yarralumla Creek as part of an enhanced blue-green connection. The Yarralumla Creek corridor must be preserved and enhanced. The Creek and its surrounding area are important to the community for recreation, active travel and reducing urban heat. The network must also aim to protect and enhance habitat for threatened species and their connectivity with green corridors and nature reserves

including Mount Mugga, Oakey Hill, Red Hill, Mount Taylor and Farrer Ridge as stated upfront in the strategy. Removing the existing tree canopy and reducing open space to pocket parks will not achieve this – consideration must be given to providing large patches of suitable woodland trees to enable this.

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

## Objections

**A new street between Holman Street and Theodore Street** through the Yarralumla Creek corridor is not acceptable as it would destroy the amenity this treed open space provides for the community. The Draft Plan inexplicably redefines much of south Curtin as “Woden North”. Presumably this is in order to frame a perception that the kind of high-density housing recently developed in Woden will extend north of Melrose Drive. This redefining is not acceptable.

- Page 97 says ‘Urban improvement can be undertaken in areas of the city that are poorly connected or function only in a limited way to improve walkability, realise the benefits of new light rail, integrate improved environmental and urban water functions, and provide housing where liveability is greatest’. The proposal for the new edge road is contrary to this. As a current resident in this area I can assure you that we have fantastic access to Woden Town Centre by bicycle or walking, public transport, the rain garden and treed amenity. The draft strategy will compromise all of this.
- In addition, this area has already become an important recreational space for residents living in high rise apartments in Woden. Where will they go when it’s open space and recreational values are diminished?
- The stated aim to “clarify the urban edge to Yarra Glen” implies that Curtin itself will be regarded as, and transformed to an urban, rather than sub-urban, location. This is not supported.
- Curtin should remain sub-urban and not be turned into the urban metropolis that Woden has become.
- Except for a few broader pockets of open space, this corridor is quite narrow and is currently just sufficient to accommodate the treed open space, Yarralumla Creek and the pedestrian/cycleway. The addition of a new road would necessarily further crowd this zone with further hardened surfaces.
- Again, in view of the narrowness of this strip of land, the siting of a new road is likely to impact on the recently installed and successfully operating raingardens (which the government has recently built at great expense.
- The Woden Floods Memorial would likely end up facing on to a hard street edge. This is insensitive to the flood victims and their families.
- An added road will increase vehicle noise impacting the adjoining residences.
- The proposed road appears to be unnecessary for ‘unlocking sites for development’ as it duplicates Holman Street.

- The sites to be “unlocked” by building this so-called urban edge road have not been identified in the Draft Strategy – one can only assume that this information has been withheld to dampen the community’s ability to respond to what is likely to be unacceptable development proposals.
- The intersection of Theodore Street and Melrose Drive is a difficult traffic management problem. The addition of a new intersection immediately adjacent to it will create further problems and risk for pedestrians and vehicles.

#### **Roundabout at the intersection of Yarra Glen, Yamba Drive and Melrose Drive**

It’s not really clear what is proposed here in terms of road development. I am opposed to expanding the roundabout beyond its current parameters. I am not opposed to development within the roundabout provided it can be done with environmental sensitivity and provide amenity for proposed uses i.e. taking into account the fact it’s a potential flood zone and can be sufficiently treed to provide amenity for whatever uses it is designed for.

**Key site and change area: Curtin edge north and south (the parts of Curtin closer to Yarra Glen)** A *‘new edge street’ through the Yarralumla Creek corridor*, supposedly ‘to clarify the urban edge to Yarra Glen’, is not acceptable as it would destroy the amenity this treed open space provides for the community. The Yarralumla Creek corridor defines the urban edge to Yarra Glen perfectly well and the proposed street would significantly degrade the blue–green connection of the Yarralumla Creek corridor. Losing trees would increase the urban ‘heat island’ effect for this part of Curtin, which is not acceptable. Increasing the number of trees, together with retaining the open green space, would be a better blue–green enhancement than the proposed 3-storey dwellings on an edge street.

The stated proposals for “Curtin edge north and south” include consideration of townhouses with a three-storey limit. For the erroneously-termed “Woden north” part of south Curtin, the similarly identified “Built frontage contributing to street identity ... ” has no indicated housing type or height limit. I object to allowing dwellings *over* 3-stories in this area.

***Separate pedestrian and cyclist pathways*** for active travel are needed here rather than new streets. I do not support turning the cycle path in Curtin into a route for a road.

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

**‘Local centre’ on Theodore Street, Curtin (site of Daana Restaurant)** The Draft Woden District Strategy must be amended to reflect that this site is not a ‘functional local centre’ as shown in Figure 31 in the Woden District Strategy Plan. Block 23 Section 29, Curtin (83 Theodore Street) is zoned CZ4: Local Centre but it is small (1039m<sup>2</sup>) and does not meet the functional definition of a Local Centre on page 159 of the Strategy: ‘Smaller shopping centres that provide convenience retailing and community and business services that meet the daily needs of the local population’. For planning purposes it cannot be treated as a local centre equivalent to those in Lyons or Hughes, for example. It would be more suitable for town houses.

I support the concerns raised at various residents' groups through recent weeks and the ISCCC submission. Those wider concerns on the plan and the Inner South District Strategy do not give me confidence that the new arrangements are for the benefit of the community; rather that they appear to be developer and revenue focussed.

From my perspective the big issue is the Future Investigation Area white circle with number one in it on the inner south map and this submission concentrates on that. I live in a 1990s townhouse on Forrest Section 12 which is part of a development that increased residential density whilst maintaining the existing bowling club.

The other numbered white circles shown on Page 94 Figure 31 are in, or adjacent to, hubs etc and therefor have quite a degree of detail of intention including colour coded legend for height and uses. They have a variety of existing commercial, business and health users and are sustainable neighbourhoods.

Our white dot (Number 1) is in an isolated area with no evidence for its inclusion. It is not in immediate proximity to other services, proposed transport, light rail; rather it is amidst one and two storey Forrest suburbia. It does not meet the five drivers: it is not an inclusive centre; it is not part of the blue-green network; it is not in the immediate vicinity of light rail; and It is not a "sustainable neighbourhood". Forrest is in fact one of very few suburbs which doesn't have a shopping/services area. Page 118 and Figure 38 are the only "detail" provided for this area. Not being linked like the other dots to hubs with detailed explanation, it appears to be little more than a "land grab" for some apparently available land.

#### **Ambiguity and lack of clarity of the area proposed**

It is confusing that while Page 118 refers to Section 19, Figure 38 map shows both Section 19 and Section 12 all outlined by the same blue bold lines. The narrative refers to the bowling club which is on Section 12. It is unclear whether the reference to apartment buildings includes the townhouses on Section 12. As an owner resident of one of twenty townhouses on Section 12 I am unclear how I will be impacted. However even it is clarified to say Section 12 is not part of the "white dot", being on the same suburban block we will inevitably be caught up in precedents and domino effects as development creeps up the block. Similarly the bowling club (Section 12), and the tennis club and church on Section 19 may well be encouraged by developers to sell and relocate.

#### **"Key Principles"**

The "key principles" shown on Page 118 Figure 38 are hardly principles that provide clear visibility of what could happen:

**Publicly accessible pedestrian path** between Dominion and National – there is already a path that leads directly from Dominion Circuit to the pupil entrance Forrest Primary School and its associated manned school crossing. Does this remain? What is the relevance/importance of this other path that warrants its inclusion as a principle? It leads from residential housing on Dominion Circuit to the edge of the Forrest Primary School playground which is fenced.

**Access to blocks by existing driveways**, but only Block 9 impact on housing opposite mentioned. No reference to any analysis of parking and traffic implications behind this "principle".

**Provide suitable landscaping to DC frontage** to reflect residential character opposite – this seems a good principle but misses the wider principle of compatibility with the surrounding suburban area of construction, usage and wider landscaping eg what about National Circuit?

**Consider noise and overlooking impacts on tennis courts and church** – unclear quite what is meant by uses extending after hours and must not be compromised by any future development. This implies tennis courts and church remain? “Must” is an interesting choice of words. It is silent on the bowling club. What about not compromising the actual residents of the 20 townhouses? What about noise and overlooking impacts elsewhere ie residents of housing across the road on [REDACTED]?

A set of principles should cover height, density, land use, compatibility with neighbourhood, heritage, landscaping, traffic and parking, noise, light etc to provide any confidence on future development.

### **Proposed Use, Zoning**

This “proposed, possible and potential key site and change area” is “conceptual” and “put forward as early ideas for discussion”. I cannot find any indication of what is thought about for use - residential, non-residential, education, health and recreational. I also cannot find any indication of height and density. The key principles above are meant to guide this but don’t provide any confidence in what might emerge.

There is a passing reference to “RZ1 or CZ6 ...have the potential to be rezoned to CZ5 Mixed Use...”. There is no detail on how rezoning would occur and whether this reference in the District Strategy provides any future “authority”. Rezoning from RZ1 to CZ5 is a large change and local residents and neighbours would expect this to involve considerable consultation.

### **Compatibility with, and Impact On, Surrounding Area**

Other than a passing reference “suitable landscaping ... to reflect residential character opposite on Dominion Circuit” there is no principle providing for sympathetic design of any structures in an area that is suburban, in a high quality suburb and adjacent to heritage areas. An immediate action should be for replacement of dead nature strip trees which impact the landscape.

There is no principle guiding density and associated parking and traffic implications. Construction on Section 9 will in effect lose some 200 parking spaces that have temporarily been provided on the Italo Australian Club site. The pressure on traffic and parking in this area has been hidden during Covid with home based work but is now steadily returning to pre-2020 levels. Interestingly during the appeal on an earlier DA for Section 9, it was shown that National Circuit/Canberra Avenue traffic light intersection was over capacity. The proposed continuation of existing driveways on Dominion Circuit will put pressure on the Dominion Circuit/Canberra Ave intersection which does not have traffic lights or divert this traffic to National Circuit, further exacerbating that intersection.

There is no principle relating to the immediate neighbourhood on Franklin Street which is NCA controlled and currently 2-4 story office blocks. Rather than potentially 6 or more stories that a CZ5 zoning might allow for, any development on this Section/s should be transitioning/stepping down to the suburban environment not increasing height. It should be sympathetic with the ambience and nature of Forrest. This area is visible from Parliament House and NCA consultation and consideration should be a requirement. The page 24 reference to the Griffin Plan suggests District Strategies reinforce.....Canberra’s role as National Capital. It also refers to protecting landscape, vistas and views.

There is no reference to the impact on the Forrest Primary School which occupies the other side of National Circuit, another NCA neighbour.

The next suburban block on National Circuit and Dominion Circuit (from Hobart Ave on) is part of the wider Forrest Heritage Precinct; other nearby areas and buildings are also heritage listed. Page 59 Note states “heritage and environmental values in these areas will be protected from future development investigations”. Page 61 refers to “Design Quality .....should reflect and contribute to the aims and ideals of the National Capital Plan”.

### **Timeframe**

The planning is “subject to further investigation and consideration”, but unclear in what timeframe and what format. Figure 31 has some little blue triangles that indicate “possible” rather than “proposed” and “potential”.

The blue triangles aside the white dot on Figure 31 indicate the area in discussion has a timeframe of “possible”. The narrative on page 118 uses words such as “conceptual”, “early ideas for discussion”, “further investigation and consultation”. The demolition of the old Italo-Australian Club, its current temporary use as a carpark, one approved and one proposed development application together with the unusual “principles” on page 118 raise concern that development on Section 19 might be more imminent than “Possible” implies. The fine detail on page 118 on little matters would indicate that planning discussions may already be occurring with commercial owners despite reference in the strategy that there are two time horizons – 2046 and 2063.

This uncertainty and ambiguity causes concern and distress for residential neighbours on Section 12 and immediately across the road on [REDACTED].

### **Impact on Existing Residential Owners and Value**

The mere appearance of the white dot (number one) on the maps in the plan virtually make it a fait accompli that the area is destined for change. It provides inadequate assurances and protections and the associated uncertainty and ambiguity immediately effects the value of properties. For those commercial sites it probably improves value and opportunities. Similarly for sporting/social sites it may encourage developers to assist in relocation to areas with better access and parking.

For the owners of the twenty residential townhouses adjoining the bowling club who have personally vested in these properties it will have a negative effect on values – who would pay a top dollar for something with such uncertainty. There is a completely different dynamic for residents who have made this a large personal investment compared to commercial or social operators.

It is unclear how changes would be introduced – are we looking at natural attrition (waiting for older occupants to die?); intimidation by developers and/or government; or possible compulsory acquisition?

In effect the twenty townhouses reflect a early 90s development that pre emptied the current thinking whereby a 1920s bowling club was able to release land for the townhouse development and gain a new building and greens. This increased the occupancy of the area to some 50 people whilst still retaining a community and sporting facility.

Many of the properties are owned by people in their 60s, 70s or 80s who have made a personal lifestyle investment in downsizing and infill housing. Further investments in comfort, safety, access and carer facilities have made the potential for aging in place a possibility, meeting another government agenda. Other properties are owned by younger families, again downsizing and occupying in fill housing close to employment and schools. Most of the twenty townhouses have invested in environmental improvements such as double glazing, insulation, awnings, solar panels plus reduced transport costs because of proximity to services. The streetscape is well preserved

under contract gardening and the construction and outside appearance of the town houses is compatible with the adjacent heritage areas.

The uncertainty about the proposed plan is a disappointing consequence that will impact individual's financial asset – hardly a reward for having made many contributions to the community and environment.

The wider concerns with the outcomes focussed, deregulated and less rules of the plan only add to this concern. It is development and revenue focussed, rather than being for the benefit of the community. Carefully considered principles that reflect the ambience, heritage and nature of Forrest including height, density, land use, parking, traffic, noise, solar access could provide an opportunity to do a compatible and sympathetic redevelopment rather than an eyesore.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



I have major concerns about the ACT Government-proposed new planning system. I have seen comments that it essentially amounts to deregulation disguised as being based on an outcomes focus. It appears that the proposal will not guarantee basic standards on setbacks from boundaries, enough green space and enough parking because it substitutes vaguely defined outcomes for most of the existing rules and moves the latter to technical standards that the government can tamper with that will. As a lawyer and being interested in the ACT planning system I am concerned about these comments and believe that the needs to be legislated with more detail. Comment I have seen appears plausible that specific standards need to be legislated so that only the Assembly can amend them and ensure that development that does not meet the specific standards can be stopped and that development that does meet them but not meet the intent of the law can also be stopped. The planning laws definitely need to be easily enforceable

I also agree with comments that rezoning for higher density within suburbs is going too far and that it is wrong to leave it up to developers and the community to fight it out block by block.

There are other issues too but suffice it to say that more work on the reforms need to be done and the community and those with expertise in the community (and that does NOT mean developers) must be listened to.

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3 March 2023

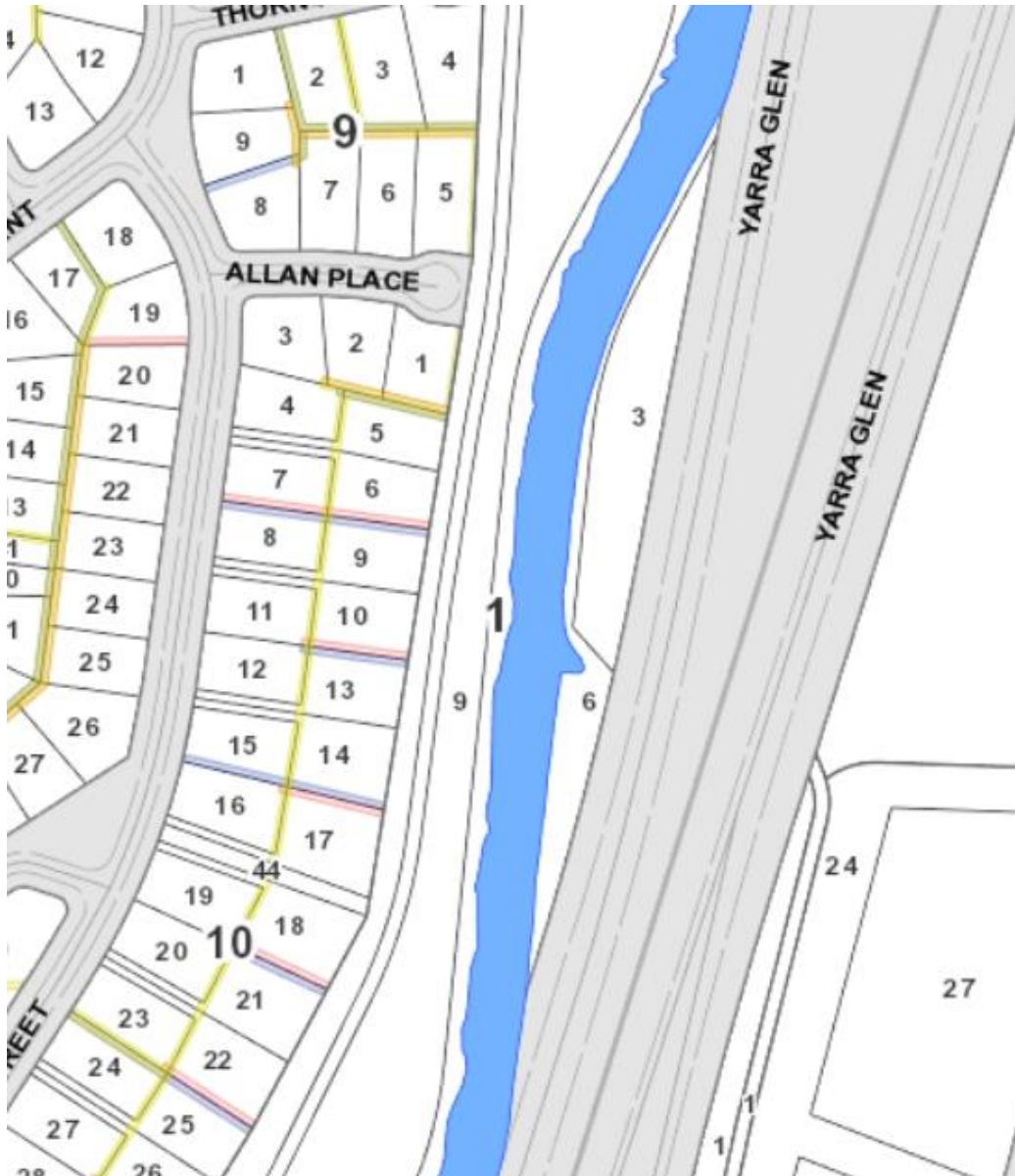
ACT Planning – Draft Woden District Strategy

Dear Recipient:

Below are our responses to Curtin Edge – North and South possible changes and in particular the proposed ‘edge street’.

1. Page 120 – the edge street is proposed to “clarify the urban edge to Yarra Glenn”. Say it for what it is – don’t use benign sounding language to disguise its purpose. The potential change to increase urban density along the eastern edge of Curtin is part of value capture in support of the proposed City to Widen Light Rail. This increase in density will have implications for the surrounding street network and the ‘edge street’ is a response to this. The urban edge is well defined by the current green corridor adjacent Yarralumla Creek and the trunk cycleway that links Woden to Civic.
2. The ‘edge street’ is on conflict with the wider aims of maintaining and strengthening existing green corridors.
3. The existing green corridor along this part of Curtin is well used by residents for recreation and exercise plus it provides a level of sound and light barrier to Adelaide Ave and any reduction in the corridor width and tree coverage will negatively impact Curtin residents.
4. Adding a new street is a lazy and last century approach to resolving issues relating to increasing the urban density in this area. A more innovative approach should be considered with the aim of a more sustainable solution wrt to ESG.
5. The proposal to convert Yarralumla Creek from a concrete drain to a more natural waterway is a positive development but this will mean an increase in its width to achieve the outcome. This increased width is not recognized in the current proposals particularly with respect to inserting an ‘edge street’ into the existing green corridor. Refer the snip below from ACTMapi flood map near Allen Place. There is insufficient width here for a widened waterway, the existing trunk cycleway and a new

street without completely filling the footprint of the green corridor.  
Hence the 'edge street' proposal really means the destruction of the existing green corridor.



6. There is considerable elevation change where the proposed 'edge street' intersects with Carruthers St and this does not appear to have been considered in the proposal.

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In summary the proposed 'edge street' appears to be an ill-considered proposal that will negatively impact an important green corridor and reduce amenity for Curtin residents. A more nuanced solution to the increased urban density proposed as part of the value capture for Light Rail should be considered and one that delivers better ESG outcomes.

Sincerely,

