



SUBMISSION ON THE ACT PLANNING SYSTEM REVIEW AND REFORM PROJECT

3 March 2023

The Molonglo Valley Community Forum (the Forum) welcomes the opportunity to provide feedback on the draft new Territory Plan and the *Draft Molonglo Valley District Strategy* (the *District Strategy*). These documents will fundamentally shape how the majority of the Molonglo Valley district develops over the coming decades. It is important that we get them right.

The Forum supports the shift towards an outcomes-based planning system. The residents of the Molonglo Valley continually express dissatisfaction with their first-hand experience of poor planning outcomes delivered by the current system. This planning reform project is a once-in-a-decade opportunity to learn from these mistakes and plan for a better future.

Based on resident and stakeholder feedback, the Forum's key recommendation is for the delivery of an additional design guide for mixed-use development. It calls for a clearer articulation of the desired outcomes of these valuable sites, to ensure the planning system delivers short- and longer-term benefits to the broader community.

Other recommendations relate to the Forum's proposed changes to the *District Strategy* to clarify the intended outcomes of the proposed initiatives. The Forum encourages the Environment, Planning and Sustainable Development Directorate (EPSDD) to consider the needs of residents and businesses in finalising the *District Strategy's* suggestions about the future of the Molonglo Valley.

THE DRAFT NEW TERRITORY PLAN

Key Recommendation – improve the quality of mixed-use development by:

- a) developing a best practice *ACT Mixed Use Design Guide* to accompany the proposed *ACT Urban Design Guide* and the *ACT Housing Design Guide*, and
- b) adding additional assessment outcomes in *Part E2 – Commercial Zones Policy* and *Part E4 – Community Facility Zone Policy* which reference the applicable elements of this *Mixed Use Design Guide*.

The Problem

The Forum views the Molonglo Valley as a microcosm of broader planning and development trends across the ACT. Our district is built on limited and topographically challenging land abutting areas of national environmental significance. To grow sustainably, development must occur in a way which minimises our ecological impact, while also meeting various other social, cultural, economic and environmental objectives.

The increased residential densities seen in the Molonglo Valley and in some other parts of Canberra are a direct result of these broader sustainability considerations. In theory, increased density can result in greater amenity for residents in the form of shops, jobs, facilities, public transport and high-quality public spaces within close walking distance of homes.¹ Unfortunately, the pattern of development we are seeing in parts of the Molonglo Valley and elsewhere in Canberra suggest that these theoretical benefits are not being consistently delivered. The result is communities with reduced levels of amenity, sustainability and wellbeing.

The original vision for the Molonglo Valley, as articulated in the 2006 *Molonglo Valley Structure Plan*, was for a series of walkable neighbourhoods centred around mixed-use nodes of development.² These varied in intensity and scale based on their accessibility and their place within the broader urban centre hierarchy. The nodes would have provided opportunities for low-impact small businesses to operate in a “shop top” environment, close to homes, transport and high-quality public spaces.

The first of these mixed-use nodes were incorporated into the concept plans and subsequent estate development plans for the first Molonglo Valley suburbs of Coombs and Wright. This involved the zoning of numerous sites as “CZ5 Mixed Use” (see [Figure 1](#)). The intent of these sites can be seen in places such as the Perth satellite town of Joondalup (see [Figure 2](#)). These real-world examples demonstrate that mixed-use development, if accommodated appropriately, can enhance local communities.

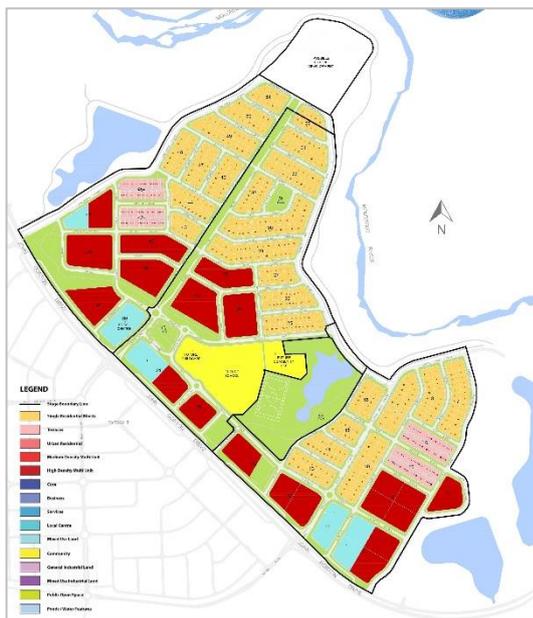


Figure 1: The Coombs Estate Development Plan, with sites zoned “CZ5 Mixed Use” shown in light blue.



Figure 2: An example of low-impact mixed use development, located at 75 Regents Park Road, Joondalup, Western Australia.

¹ <https://www.planning.act.gov.au/act-planning-strategy/resources/2012-act-planning-strategy>

² https://web.archive.org/web/20080722002317/http://www.actpla.act.gov.au/__data/assets/pdf_file/0018/6282/Structure_Plan_report.pdf

It was this vision that the former Land Development Agency (LDA) advertised to prospective buyers of land in Coombs from 2014 to 2017.³ With the promise of “planned local shops, a public school, community facility and Mixed Use developments”, residents were painted a picture of future convenience and amenity right on their doorstep. It was a logical continuation of the vision articulated in the 2006 *Structure Plan*. Unfortunately, as Coombs approaches completion, none of the five sites zoned for mixed-use development feature a non-residential use, nor are they designed to be easily adapted to accommodate such uses in the future (see [Figure 3](#)). They are “mixed-use” in name, but not in function.



Figure 3: Residential developments at Coombs Section 7, Block 1 (top) and Section 41, Block 3 (bottom). Both sites are zoned “CZ5 Mixed Use”, but neither feature a genuine mix of uses.

This issue is not contained to the Molonglo Valley. The Gungahlin suburb of Thorsby features one mixed-use site capable of being developed with shops (Section 18, Block 1). Much like the mixed-use sites in Coombs, this site in Thorsby has been developed as exclusively residential. Similar trends are emerging in the Gungahlin suburb of Taylor and at some redeveloped local shop sites in established suburbs.

³ <https://www.web.archive.org/web/20170302185634/http://www.lda.act.gov.au/molonglo/coombs>

There is growing body of evidence to suggest that the failure of mixed-use development to deliver a genuine mix of uses is a growing, territory-wide problem.

The Forum believes there are several reasons why this is occurring:

1. The planning controls in the relevant *Precinct Codes* rarely require commercially adaptable ground floors or active retail frontages on mixed-use sites.
2. The LDA/Suburban Land Agency (SLA) have not put in place lease conditions that would require or actively encourage commercial or community use on mixed-use sites.
3. The relevant objectives for the *CZ5: Mixed Use Zone* in the current Territory Plan are vaguely worded and open to interpretation, to the point of being practically unenforceable.

In short, the current planning system is not delivering mixed-use development which meets community expectations. The result is a loss of valuable floorspace that could be home to small businesses and sorely needed facilities that benefit the wider community.

The Solution

To restore confidence in the ability of mixed-use zoning to deliver a genuine mix of compatible uses in our suburbs and centres, the Forum recommends that EPSDD develop an **ACT Mixed Used Design Guide** (the *Mixed Used Design Guide*) to accompany the proposed *ACT Urban Design Guide* and *ACT Housing Design Guide*. This document should contain benchmarks and guidelines to ensure developers deliver building spaces that are attractive and useable by prospective tenants. Consultation should be undertaken with the local business community and community service providers to ensure the guide is tailored to the specific needs and commercial realities of the ACT.

There are numerous examples of mixed use and commercial design guides in effect elsewhere in Australia. One such example is the *Quality Design Guidelines for Commercial and Mixed Use Areas* used by Melbourne's Glen Eira City Council.⁴ These guides clearly describe and illustrate desired outcomes for mixed-use sites at a variety of scales, including the preferred ratio of commercial floorspace per square metre of site area for strategic development locations. They also articulate how major new mixed-use developments should be designed to deliver significant, community-wide benefits.

The overarching objective of the *Mixed Used Design Guide* should be to facilitate the development of sustainable and usable spaces for businesses and community service providers within mixed-use buildings and precincts. It should discourage spaces that are likely to remain vacant due their cost, size, or usability, and encourage building layouts that provide safe and comfortable separation between residential and non-residential uses. There is an opportunity for the *Mixed Used*

⁴ <https://www.gleneira.vic.gov.au/media/3654/quality-design-guidelines-commercial-and-mixed-use-areas.pdf>

Design Guide to graphically illustrate how smart building design can be employed to successfully manage the competing demands of buildings which feature a diverse range of uses.

While the Forum acknowledges EPSDD's decision to not proceed with district and precinct-specific design controls for commercial development on mixed-use sites,⁵ it is envisioned that the *Mixed Used Design Guide* would fill a broader gap within the draft new Territory Plan. As with the proposed *ACT Urban Design Guide* and the *ACT Housing Design Guide*, the aim should be to lift the quality of all new commercial and community spaces in mixed-use developments across the ACT. A failure to provide this design guidance is likely to result in a continuation of the poor outcomes being delivered by the current planning system.

THE DRAFT MOLONGLO VALLEY DISTRICT STRATEGY

Recommendation 1 – Update the *District Strategy* to reflect the latest population forecasts from ACT Treasury, by:

- a) revising the final intended population of the Molonglo Valley from 55,000 to 86,000
- b) upgrading the Molonglo Group Centre to “Town Centre” status within the ACT centres hierarchy, and
- c) ensuring planned population increases are delivered in areas with appropriate levels of amenity, transport accessibility and infrastructure.

The latest population projections from ACT Treasury show the Molonglo Valley reaching a total population of 86,148 by June 2060.⁶ This is significantly higher than the figure of 55,000 contained in the *District Strategy* and outlined on the EPSDD website.⁷ The Forum understands that prior planning studies had only ever conceived of a final intended population of up to 60,000 residents in the Molonglo Valley.

In the event 31,000 additional residents will be accommodated in the Molonglo Valley, the Forum believes that significant spatial, social and services planning changes will be required. A Molonglo Valley that is home to 86,000 people will substantially increase the required provision of accommodation, shops, transport links and key amenities such as schools, recreational facilities and urban open space. Failure to adequately plan for these basic community needs at this early stage will have dire consequences for the future liveability of the district.

The first step towards accommodating this previously unanticipated growth should be the reclassification of the Molonglo Group Centre to “Town Centre”

⁵ https://hdp-au-prod-app-act-yoursay-files.s3.ap-southeast-2.amazonaws.com/1616/6798/7860/New_Territory_Plan_-_Supporting_Report_-_CONSULTATION_VERSION_09.11.22.pdf

⁶ <https://www.treasury.act.gov.au/snapshot/demography/act>

⁷ <https://www.planning.act.gov.au/planning-our-city/planning-studies/molonglo-valley>

status. As articulated in the *District Strategy*, this should involve a greater focus on providing local employment and recreation opportunities. To provide sufficient time for this reclassification to be factored into the future development of the centre, this change should take place with the commencement of the new Territory Plan, rather than at some undefined point in the future.

This additional growth should also be located in areas best placed to support it. The *2018 ACT Planning Strategy* acknowledges that the most appropriate location for new homes is close to jobs, services and transport links.⁸ In the future, assuming a corresponding increase in the provision of amenities, transport accessibility and infrastructure, the Molonglo Group/Town Centre will be one of these locations. Further guidance on how to balance growth in residential development in this centre with the appropriate provision of facilities with a wider community benefit is outline in Recommendation 2.

Recommendation 2 – Protect the future delivery of commercial and community facility floorspace in the Molonglo Group/Town Centre by:

- a) requiring the delivery of a detailed community, retail and commercial needs analysis as part of the centre’s preliminary planning work, with a view to meeting the needs of the Molonglo Valley’s future population of 86,000 people
- b) developing a precinct plan for the Molonglo Group/Town Centre to ensure strategic community, retail and commercial facility floorspace targets are met on a site-by-site basis, and
- c) reviewing the building controls for the centre and surrounds, to ensure future residential development does not come at the expense of facilities needed by the wider community.

As articulated in this submission’s Key Recommendation, there is growing community concern about the balance of uses in land zoned for mixed commercial, community and residential use. The highest profile of these examples has been the conversion of the north-west precinct in the Gungahlin Town Centre from its intended use as a business park, to a predominantly residential estate with little commercial or community offering.⁹ This is an outcome that the Forum does not wish to see repeated in the Molonglo Valley.

The increased population projections for the Molonglo Valley, as discussed in Recommendation 1, point to a future where land is at a premium. In the battle for land use, history suggests that community needs, such as facilities, retail and commercial premises, are expendable to residential development. The Forum does not believe that this outcome is desirable or inevitable. With sufficient and firm

⁸ https://www.planning.act.gov.au/_data/assets/pdf_file/0007/1285972/2018-ACT-Planning-Strategy.pdf

⁹ <https://gcc.asn.au/getting-development-right-for-the-town-centre-the-gungahlin-residential-towers-story/>

guidance from the ACT Government, the Forum believes that genuine mixed-use development in the Molonglo Group/Town Centre can accommodate the district's housing requirements, as well as its commercial and community needs.

The first step towards getting this balance right is ensuring decisions are informed by a thorough understanding of the community, retail and commercial floorspace requirements of the Molonglo Valley and its intended population of 86,000 residents. The Forum supports the proposed *District Strategy* initiatives which call for these studies to be undertaken as a matter of priority. The studies would ideally be cross-directorate initiatives between EPSDD and the SLA to ensure a joint understanding of these future requirements and a shared vision for implementation.

The next step is to guarantee these future floorspace requirements are met. Auctioning off parcels of mixed-use capable land with no articulation or means to enforce a desired outcome, as undertaken by the former LDA, is not well suited to meeting broader land use objectives. The Forum believes that precinct-scale planning in the Molonglo Group/Town Centre, with measurable targets for non-residential floorspace, can complement the proposed *Mixed Use Design Guide* in achieving a diverse, compatible, and desirable mix of uses across multiple individual sites with varied ownership.

Finally, to avoid the possibility of non-residential uses being “squeezed out” of the Molonglo Group/Town Centre to accommodate a higher residential population, the Forum recommends that a comprehensive urban design review be undertaken for the centre. This review should ensure that the building controls featured in the relevant *District Policy* and *District Specification* sections of the new Territory Plan facilitate development which meets broader district-level needs, such as shops, office space and community facilities, while still maintaining solar access to streets and public spaces. Residential development should be permitted where it is compatible with the primary non-residential use of the site.

Recommendation 3 – Deliver greater certainty around Molonglo's future transport connections, by amending the *District Strategy* to explicitly plan for:

- a) a future rapid bus connection between Woden and Belconnen via Weston Creek and Molonglo, as detailed in the *ACT Transport Strategy 2020*
- b) future light rail connections from Molonglo to the City via Parkes Way, and from Molonglo to Woden via Weston Creek, as per the *ACT Light Rail Network Plan 2015*, and
- c) bus priority measures and reserved space for future light rail in new and upgraded roads that form part of the *National Capital Plan's* Inter-town Public Transport system.

Transport links are an essential part of district planning. The *District Strategy* acknowledges this by providing the first comprehensive overview of planned

future public transport connections in the Molonglo Valley since the 2009 *ACT Strategic Public Transport Network Plan* (the *Network Plan*).¹⁰ Despite the significant developments that have occurred in the intervening period, the underlying principles of the *Network Plan* remain sound and should continue to inform future transport planning in the Molonglo Valley.

The *Network Plan* envisions two high-frequency public transport routes operating through the Molonglo Valley. The first route connects the Molonglo Valley to Belconnen via an extension of Bindubi Street, and to Weston Creek and Woden via Streeeton and Hindmarsh Drives. Sections of this route are identified in the 2020 *ACT Transport Strategy* as forming part of the “Future Rapid Network”.¹¹ The explicit mention of this connection in the *District Strategy* is welcome and must be retained in the final version to ensure it will be delivered as part of a future network update.

The second public transport route serving the Molonglo Valley outlined in the *Network Plan* connects the district to the City via Parkes Way. This route was identified as a future light rail corridor in the 2015 *ACT Light Rail Network Plan*.¹² This is correctly acknowledged in the relevant *District Strategy* maps. The Forum recommends taking this one step further, by rewording the relevant initiatives to explicitly mention the delivery of future light rail along this transport corridor. This will provide significantly greater certainty of future investment, service quality and connectivity for residents and businesses of the Molonglo Valley.

Prior to the extension of light rail to the Molonglo Valley, both corridors will be serviced by rapid buses. To ensure these buses operate quickly and reliably, the *District Strategy* should require the ongoing delivery of bus priority measures, including dedicated lanes and signal priority at key intersections. To avoid expensive and disruptive retrofitting, these priority measures should be built up front in new roads and as part of upgrades to existing roads along the Inter-town Public Transport corridors identified in the *National Capital Plan*, which include the two routes outlined above.¹³ These roads should also be required to reserve space for future light rail, as per the relevant Transport Canberra corridor preservation guidelines.

Recommendation 4 – Provide greater certainty regarding the future of the Molonglo River corridor, by:

- a) using appropriate and consistent terminology throughout the *District Strategy*, and
- b) clarifying the intended future use of the Coombs Peninsula.

¹⁰ <https://web.archive.org/web/20120321045356/http://transport.act.gov.au/references.html>

¹¹ https://www.transport.act.gov.au/__data/assets/pdf_file/0016/1613302/200601-ACT-Transport-Strategy_web.pdf

¹² https://www.transport.act.gov.au/__data/assets/pdf_file/0016/1229011/Transport-Canberra-Light-Rail-Network.pdf

¹³ <https://www.nca.gov.au/planning/plans-policies-and-guidelines/national-capital-plan/consolidated-national-capital-plan/part-three>

The *District Strategy* uses the terminology of ‘Molonglo River Reserve’ and ‘Molonglo River corridor’ in similar contexts. Their meanings, which are not defined in the glossary, are quite different. The ‘Molonglo River Reserve’ is a precisely defined spatial area, for the purposes of its management. The ‘Molonglo River corridor’ refers to the wider landscape influenced by the river itself. This includes the biodiversity of plant and animal species and their movements alongside the river, where a boundary is not so defined, and may vary seasonally and with flooding or drought. The Forum believes greater specificity is required.

In the broader context of the river corridor development in the Molonglo Valley, the Coombs Peninsula has been an ongoing and contentious issue. This has been well documented and includes a community petition to the ACT Legislative Assembly to preserve the biodiversity of the river corridor.¹⁴ The peninsula is marked on the *District Strategy* maps as ‘possible development’, yet the intended form of this future development remains unclear.

The Forum requests that the *District Strategy* put an end to this planning limbo, and provide significantly greater clarity about the intended short, medium and long term use of the Coombs Peninsula. The present situation, which has seen the indefinite deferral of plans to complete the sealed cycleway around the peninsula to link Stromlo Forest Park with the City, South Canberra, Weston Creek and Tuggeranong, is a source of continual frustration for residents and visitors. A priority resolution, cognisant of the needs of the wider Molonglo Valley, is therefore sought.

¹⁴ <https://epetitions.parliament.act.gov.au/details/031-19>



ACT Planning System Review

Landcare ACT Submission

ACT Planning System Review & Reform Project
Environment, Planning & Sustainable Development Directorate
ACT Government

Dear ACT Planning System Review Team,

Thank you for the opportunity to provide comment on the Planning System in ACT. Planning is a critical strategy for maintaining the ecological and agricultural assets of the ACT. The Planning System Review is welcomed by Landcare ACT and our members.

Landcare ACT is the peak representative body for community landcare in our region, representing and supporting over 70 Landcare groups and thousands of individuals caring for local environments in our region. Landcarers play an important role in maintaining and improving natural values in reserves, parklands and waterways, supporting sustainable agriculture, promoting the value of Aboriginal heritage, mobilizing the community in citizen science and improving liveability and biodiversity in cities under a changing climate. Landcare ACT works with our foundation member bodies: Southern ACT Catchment Group; Ginninderra Catchment Group; Molonglo Conservation Group; Buru-Ngunawal Aboriginal Corporation; and the Rural Landholders Association. Landcare ACT is a member of the National Landcare Network and as such provides a clear pathway for grassroots landcarers to contribute and be heard from a local to national level.

Feedback on the Planning System Review regarding Accessibility, the draft Territory Plan and draft District Strategies is outlined below.

Accessibility

The draft Territory Plan and District Strategies are not adequately comprehensible and accessible to the community. Community understanding of and confidence in the Planning process is important in a robust planning system. There is very strong interest from the Landcare community in the planning process, however the current documents are complex and difficult to interpret. While a consultation process and workshops in each region is appreciated, consultation was not adequate to enable the interested public to understand

the proposed Plan and Strategies. There is a need for clear objectives for the future of the Territory that recognises competing demands and provides a strategy for addressing these.

Draft Territory Plan

The draft Territory Plan requires significant revision to ensure that biodiversity loss, cultural heritage, agricultural landscapes and climate change are adequately considered.

The Draft Plan is overly complex with numerous associated documents that for many in the community are not comprehensible. The Plan requires clear objectives that recognise the competing priorities for land in the ACT and identify an approach to addressing this.

Landcare ACT welcomes the Wellbeing and livability intentions and attempts to minimise Greenfields development and associated loss of ecologically and agriculturally important land through 70% urban infill, yet further work is required. It is increasingly being recognised that human wellbeing relies on environmental functioning, yet the current plan strongly prioritises wellbeing through the built form. Introducing the concept of environmental stewardship throughout the draft Territory Plan would be an important step.

Landcare ACT commend the work of ACT Government through the Connecting Nature Connecting People Project, led by ACT NRM, and urge the planning system reform to continue working with this project. In addition, we recommend the 'A Biodiversity Network', a Conservation Council initiative, that could support the protection and enhancement of natural values in the ACT, by designating land uses that put conservation values at the forefront. The Explanation of Intended Effects Urban Guide may provide ecological guidelines, however this is unclear from the documents.

Draft District Strategies

The current draft District Strategies do not adequately address environmental and assets will be protected in a growing Canberra. The Blue green network, while welcomed does not appear to include areas addition to those in current conservation lands or corridors and in places seems to contradict other areas of urban development. There is a need for areas with high conservation value outside the reserve system to be protected. It is recommended that there is further consultation with Environmental and Agricultural stakeholders and that off-reserve priority conservation areas be conserved cross-tenure in accordance with the Biodiversity Network (outlined above). Further work is required to identify high conservation value areas, as is being undertaken through the Connecting Nature, Connecting People Program. Additionally, clear guidelines on the protection of cultural heritage and mature native trees are required.

It is unclear why there are District Strategies and District Policies and it is recommended that these be combined.

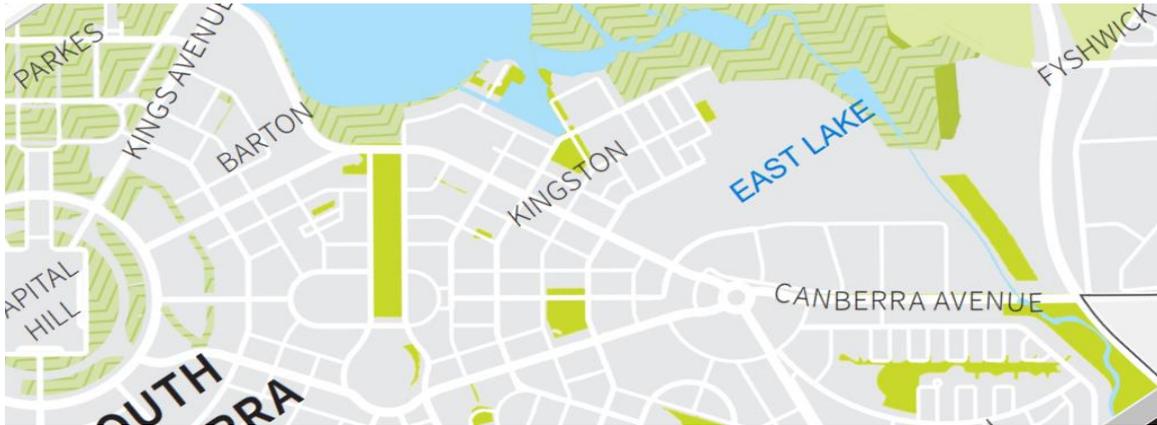
We would welcome the opportunity to discuss this issue further. If you would like to discuss any aspects of this submission, don't hesitate to contact me on [REDACTED] or by email at [REDACTED] .

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Yours sincerely



02/03/2023



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KBRG SUBMISSION ON DRAFT DISTRICT STRATEGY – INNER SOUTH 2022 AND DRAFT TERRITORY PLAN 2022

The Kingston & Barton Residents Group Inc. (KBRG) was formed more than 10 years ago as a voluntary, not for profit, non-political, community organisation that seeks to promote and protect the interests of its local community and the environment. Its Constitution says: “The aim of the KBRG is to ensure the Kingston and Barton area is a great place to live, and to do this by promoting:

- High quality planning, urban design and construction
- The preservation and recognition of the area’s unique heritage character
- The provision of adequate green public open spaces
- Effective transport planning including traffic and parking management, & access for pedestrians & cyclists
- A strong community spirit, and
- Other quality of life matters such as public safety and noise management”

The KBRG Committee endorses the separate submission from our President, [REDACTED]. In particular we are very concerned about the following matters.

1. DRAFT DISTRICT STRATEGY – INNER SOUTH 2022

The government’s draft strategy delivers very little “key infrastructure for the benefit of the local communities”. As [REDACTED] has pointed out, this should be an important goal of local strategic planning, which should not just be a vehicle for the government’s agenda.

The Inner South Canberra Community Council’s ***Inner South Canberra District Planning Strategy – FUTURE DIRECTIONS FOR OUR DISTRICT – 2021*** is a much more comprehensive, locally sensitive attempt at a District Strategy. It was provided to EPSSD planners in December 2021 in order to inform their draft strategy. The communication companies conducting consultation for EPSSD also received copies.

KBRG was the lead group for the ISCCC's *District Planning Strategy* and it required a great deal of voluntary work, with inputs from the other groups in the Inner South and a public workshop with residents. **We are very disappointed that the government has apparently ignored this work and the whole range of specific 'Actions' it called for, eg. within KBRG's area of interest:**

- Primary and secondary school capacity in the area will need augmentation.
- Much of the utilities infrastructure including kerb and guttering needs upgrading or replacement.
- Shared paths and footpaths need fixing and widening to cater for high level of mixed mode active travel and additional kerb crossings may be required in the vicinity of schools.
- Improve the connectivity between Canberra railway station and the ACT transport network.
- Development at Kingston and Manuka Centres must respect the heritage values of the areas.
- Support Fyshwick transitioning to a diverse mixed-use area. Phase out heavy industrial and polluting activities.
- Fyshwick needs a Masterplan process to prevent *ad hoc* industrial proposals (such as waste processing or freight hubbing) unsuited for the area.
- All public realm to be provided with continuous tree canopy corridors.
- Ensure the heritage urban forest is retained, renewed when trees die, and celebrated.
- Provide substantial tree and other plantings within and connecting to existing parks and wildlife corridors.
- Ensure the needs of younger people living in the Inner South are assessed and reflected in provision of community facilities, including school facilities.
- Improve the safety linkages of cycle paths for all Inner South suburbs for work and recreation.
- Introduce play/recreational areas at Norgrove Park and Bowen Park and provide much needed toilets at Norgrove Park on the Foreshore...
- The Kingston Arts Precinct design should respect the 2014 Master Plan, meet all heritage requirements and maintain significant sight lines to the Powerhouse. The design should also address the heat island effect through the establishment of green open space and tree canopy cover and minimize traffic impacts on Eastlake Parade.
- Improve vehicular access between Canberra Avenue and Monaro Highway to address traffic problems, such as congestion on Ipswich and Newcastle Streets in Fyshwick.
- Improve pedestrian comfort, safety and amenity of local streets by reduced speed limits, more tree planting, upgraded footways, cycleways, street and pathway lighting and seats.
- Prioritise the assessment of the long-standing heritage nominations, including the Manuka Shopping Precinct, Kingston Shops, Kingston Post Office and Jardine Street Commercial Row.
- Identify those significant heritage places in Inner South Canberra that have not yet been nominated for inclusion on the ACT Heritage Register.

- Exclude heritage places and heritage precincts from inclusion in possible urban intensification areas.

All of these actions, and those pertinent to other areas, should be included in a totally revised *DRAFT DISTRICT STRATEGY: INNER SOUTH*.

2. LEADING PRACTICE DEVELOPMENT ASSESSMENT

As [REDACTED] has also pointed out, the proposed new planning system departs radically, and apparently without any clear justification, from the 'Development Assessment Forum' (DAF)'s '***A Leading Practice Model for Development Assessment in Australia***', which was a nationally agreed benchmark document.

Under this Model there are ten '*leading practices*' that a development assessment system should exhibit. The current ACT planning system tried to follow these as closely as possible, except that a rigorous process of continuous evaluation and improvement was not instituted. **Problems with the current system should be fixed, rather than this misguided and unjustified attempt to reinvent the wheel!** In this regard, KBRG notes that the Explanatory Statement for the *Planning & Development Bill 2006* also proposed radical changes to the previous planning arrangements and said: "***As well as being simpler, more consistent, and easier to use, this [proposed] system is a move towards national leading practice in development assessment.***"

3. DRAFT TERRITORY PLAN 2022

The KBRG Committee also agrees that this draft plan is unjustifiably complex, voluminous and potentially difficult to apply and administer. The proliferation of 'outcomes' statements is likely to produce confusion, conflict and uncertainty because of the difficulty of assessing compliance and this will **substantially further reduce** the already low levels of confidence and trust of the community in the planning system.

It is also of great concern that most of the 'rules' and 'criteria', which are critical for the community (and ACAT) to use in assessing compliance with planning policies, are to be moved out of the Territory Plan and into non-statutory 'supporting materials', where they can be changed at will without scrutiny by the community and Legislative Assembly and ignored as desired by the non-transparent planning authority, which appears to just doing the bidding of the government and the development industry.

The KBRG Committee believes this is entirely unacceptable!

[REDACTED], Secretary KBRG

20 February 2023

SUBMISSION FROM OAKS ESTATE RESIDENTS ASSOCIATION ON THE ACT GOVERNMENT'S PROPOSED EAST DISTRICT STRATEGY

My name is [REDACTED] and I am the President of the Oaks Estate Residents Association and this submission is made on behalf of the Oaks Estate Residents Association.

1. The Oaks Estate Residence Association is committed to represent the best interests of the residents of Oaks Estate through community consultation and public advocacy.
2. The Oaks Estate Residence Association will do this with a view to improving the lives of residents and the environment in which they live while acknowledging the unique and historic nature Oaks Estate.
3. The Oaks Estate Residents Association will aim to achieve this through the development of collaborative partnerships with community organisations, local businesses and with the ACT Government.

The Oaks Estate Residents Association is an active member of the Inner South Community Council and we consider Oaks Estate to be an integral part of the Inner South District of Canberra.

Background

Oaks Estate is an urban village located in the ACT on the border with NSW. Oaks Estate is the oldest settled area of the ACT and as such has significant heritage value for the whole of the ACT. Its location within the Molonglo River corridor means that it would have been a resource rich area for First Nations people prior to European settlement and as such has cultural significance to First Nations People of the Limestone Plains area

The East District Strategy

1. The Government bureaucrats that develop this Strategy purport that Oaks Estate Residents were consulted regarding this proposal which is not the case. Minister Gentleman has stated in correspondence to our Association that we can be considered in the consultation for the South Canberra District Strategy. This is not a tenable suggestion as the East District Strategy includes Oaks Estate and is not considered to be part of the Inner South Canberra District for the purpose of the Planning process.
2. Oaks Estate has no public transport provided by the ACT Government and limited access through Queanbeyan transport. This is not addressed in the Strategy. The proposed bus links in the Strategy end at the NSW boarder on Pialigo Avenue and Beard and neither location is accessible to pedestrians.
3. Oaks Estate has 34 % Public Housing the highest proportion of any suburb in the ACT. The Public Housing is not fit for purpose, is not energy efficient and is ageing. This is not addressed in the Strategy and there is no current ACT Government strategy to address the issues of Public Housing in Oaks Estate.
4. Rental stress in the East District is the highest in Canberra at 61%. There is no comment about this in the Strategy.
5. There is limited access to services in the ACT for Oaks Estate residents who are some of the most disadvantaged in Canberra. Access to services for many residents is constrained by the reliance on irregular bus services between Queanbeyan and Canberra. The East District Strategy states that Oaks Estate Residents have "access to many services provided by Queanbeyan-Pelerang Local Government Area". It is wrong to assume that there is an automatic entitlement or access to NSW

services. For example, children in Oaks Estate do not have an entitlement to an enrolment in a Queanbeyan school. Another example is that there are no bulk billing General Medical practices in Queanbeyan. Also most specialist services are only available in the ACT.

6. There are 87 Public Housing dwellings in Oaks Estate. To date the ACT Government has not indicated any plan to redevelop these units or to demolish them and sell the land. The residents of the Public Housing units have complex needs that require a coordinated service response if they are to continue to live in the units long term. Currently the St Vincent de Paul Society is funded by the Commonwealth through the NDIS to provide a Community Inclusion Programs and service coordination for the Public Housing tenants of Oaks Estate. This program was initially funded for 2 years and has just been granted funding for the next 18 months. There needs to be permanent funding to support these tenants, many who have complex and multiple needs including mental ill-health, disability, poverty and substance abuse problems. There is a number of units earmarked specifically for adults exiting the AMC. There is no consideration in the East District Strategy that would indicate an understanding of the needs of such a vulnerable community.

7. Oaks Estate is often forgotten by the ACT Government and many people actually think it is in NSW. We understand that ours is a small community but we want to be treated equitably and be an intrinsic part of residential Canberra.

By locating Oaks Estate, a residential suburb in a district dominated by light industrial, commercial, transport and rural interests denies Oaks Estate residents connections to the rest of residential Canberra and further marginalizes our community and the unique problems and challenges our residents' experience. Our Association is a member of the ISCCC and we have been well supported by the Council. Oaks Estate residents want to be located in the Inner South District and our needs and aspirations for the ongoing planning and development of our suburb be properly included within the Strategy for that district.

Environment, Planning and Sustainable Development Directorate
EPSDDComms@act.gov.au

Comments on the Draft new Territory Plan and the Draft Inner South District Strategy

Thank you for the opportunity to comment on the draft Territory Plan and Inner South District Strategy.

The communication of the concepts has been disappointing from a community perspective. The impact that these documents may have on the community is significant, and it would have been anticipated that the consultation was open and inclusive. This has not been the experience of the Inner South Canberra Community Council (ISCCC) and the Red Hill Residents Group (RHRG).

A recent article in the Riotact (11 February 2023) said it best: “a lack of information and an unwillingness of planning directorate officials to front public meetings is hampering the community consultation for the draft Territory Plan and the proposed District Strategies”. The community continued to be “starved of essential information and not able to quiz officials”. In addition, the EPSDD maps providing the vital information regarding future planning were “too small for people to scrutinise but a request for high-resolution maps as far back as November had come to nought”. It was only as recent as 15 February that these maps were finally made available. ISCCC was unable to provide this information to its public forum on 7 February, despite requests as far back as November last year. In the same article, Marea Fatseas (ISCCC Chair) stated that “the government had been working on this for three years yet could not furnish maps that people could read so they understood how the proposed changes might affect them”.

“Future Investigation Areas” have been a major concern to residents. The maps are of a very low density and difficult to understand. Residents know the importance of being clear in such areas, as down the track there will be the inevitable “we advised of this possibility in the District Strategy”. How have these areas been selected? Is there room for comment on them individually? Or is it the case that when the District Strategy is approved, there is a tacit approval for significantly increased density in these areas?

The draft Territory Plan is unjustifiably complex, voluminous, and potentially difficult to apply and administer. The focus on ‘outcomes’ statements is likely to produce confusion, conflict, and uncertainty because of the difficulty of assessing compliance and this will further reduce the already low levels of confidence and trust of the community in the planning system. There is a great irony that this more complex proposal has the aim of simplifying the planning system. It may do so for developers, but not for the community.

It is also of great concern that most of the ‘rules’ and ‘criteria’, which are critical for the community (and ACAT) to use in assessing compliance with planning policies, are to be moved out of the Territory Plan and into non-statutory ‘supporting materials’, where they can be changed at will without scrutiny by the community and Legislative Assembly and ignored as desired by the non-transparent planning authority, which appears to just doing the bidding of the government and the development industry.

Technical specification documents are not legally enforceable, as they are not part of territory plan. These would now contain many of the current rules, including development and site controls, height, bulk and scale. The issue is that these statements are qualitative, broad in nature and not measurable. They are not a basis for consistent decision-making and assessment against a broad range of desired outcomes will be more open to differing interpretations. This gives ACTPLA enormous discretion to approve applications, and it may be hard to win an appeal against approvals, as this will involve assessing competing subjective judgements.

This issue can be solved by making the desired outcomes real, based on verifiable evidence and objective tests of compliance (for example solar access). Existing rules, such as mandatory assessment requirements, could be retained (eg. the V369 Living Infrastructure provisions). There could also be consideration given to applying a height limit for all residential zones of 11.5 metres, as applies in Deakin.

Conclusions from the ISCCC Forum on 6 Feb showed that overall attendees were dissatisfied with the current territory, proposed territory plan and district strategies, and with the process of consultation. The Chair summarised the following key conclusions, including:

- There is a lack of information provided by the ACT Government including good quality maps to help the community provide feedback.
- Community groups can't be expected to have meaningful input into policy when they don't have accurate and detailed information that informs them of the impact of what's being proposed. The ISCCC can say this isn't acceptable and argue that the date for submissions should start from when we are given proper information.
- There is no evidence of putting the Community first.
- Ask for the rationale underpinning the proposed zoning (eg General Urban, Urban Centre, urban Core).
- If we are to have an outcomes-based system, it needs to be measurable. What is proposed isn't. There is a need to have compliance irrespective of the system.
- The need for a right of appeal was emphasised.
- There needs to be more focus on heritage and how that is dealt with in the territory plan and district strategy. The importance of maintaining heritage including built heritage and cultural heritage and not just environmental heritage was emphasised.
- There is the need to design for climate change and at the moment it doesn't seem to be designed that way, both in terms of things like green space on blocks and EV charging in apartment buildings etc.
- The need for public housing to be included in new developments is important in the Inner South.

- People expect certainty about what can be built next to them or nearby. Clear rules are needed for knock down, rebuilds.
- People want clear guidance so that they know that they are not going to lose their solar access and that there's going to be adequate green space on residential blocks and near urban intensification areas.
- Residents feel disempowered and that they're not going to be listened to. The process seems to be being done in such a way that the Government is ticking the box that it has carried out community consultation, but the Government knows what it wants to do.
- The need to work cooperatively with the heritage unit and the current clear heritage rules is important, and to improve property buyers' awareness of heritage areas and requirements.
- Send the government the ISCCC's draft District Strategy again.
- When approvals are done, they need to be done in a reasonable time frame. Explore what can be done to address other barriers within the system to speed up appropriate precinct scale development to meet the needs of current and future generations.

Red Hill residents' concerns included comments such as:

- The relatively small time allowed for comments – and for residents to get their heads around a very complex proposal.
- If the overriding guidance is community, it has been overlooked.
- There is a need for genuine First Nations consultation.
- The public green space and the private green spaces all contribute to Red Hill's green space. The dual occupancies reduce that private green space opportunity. Could we rethink the Government's proposed reduction from 30% to 24% planting area on residential blocks and argue that that's not compatible with the climate change issues that we're facing?
- There are random proposed high density hot spots in the Government's Sustainable Neighbourhoods map (Fig 36 in Draft District Strategy). There is a high-density blob above the recently developed Nelson Park? There was extensive community communication to come up with the final product in The Parks development and now it appears rewritten?
- The community is the whole of Canberra. How can these blocks be randomly selected? What is the formula? Who is making decisions?
- It appears that developers can now make their own rules.

- There is a concern about the infill increasing noise levels
- The new Territory Plan creates a “power inequality between residents’ situation and that of the developers”. This refers to the financial resources, knowledge and experience of the developers in comparison with most residents having little to no knowledge and having to tackle complex planning submissions.
- The “Listening Reports” will only be of value if the government has actually heard what is being said by the community.

The EPSD Directorate may acknowledge the Ngunnawal people and recognise the special relationship and connection they have with this country, but this does not necessarily translate to entering discussions with the Ngunnawal people and taking their views into consideration during such planning exercises. The RHRG is interested to see the results of collaboration with the Dhawura Ngunnawal Caring for Country Committee (DNCCC). The strategy states that the government will continue to collaborate with DNCCC on opportunities to provide input on knowledge, culture, and traditions, however there are no specifics regarding the outcomes of these discussions.

The RHRG has been in contact with Ngunnawal representatives (elders), and we expect to be speaking to them shortly. We will come back and provide their advice in due course.

The obvious subjective nature of outcomes-based planning means there can be a huge difference between what is promised and what is actually delivered. The outcome I have in mind, and the outcome a developer has in mind will be very different and that leads to the question – whose outcome and what outcome is being considered?

In summary, the community feedback we have been receiving is strongly against the draft Territory Plan and draft Inner South Strategy in their current formats. We are not sure how feedback was obtained to come up with these new plans, but it appears mis-guided and not a true reflection of the community. No amount of spin for largely unregulated outcome-based development can hide the inescapable negative consequences of subjective outcomes, “upzoned” zoning areas and relentless loss of green space. The ultimate outcome is rarely the enlivened urban area promised. More often actually delivered is environmental urban landscape destruction with an inevitable inheritance of loss.


Chair, Red Hill Residents Group

23 February 2023



ACT Planning System Review & Reform Project

TERRITORY PLAN AND INNER SOUTH DISTRICT STRATEGY

The Old Narrabundah Community Council (ONCC) appreciates the opportunity to provide comment on the draft Territory Plan and Inner South District Strategy.

According to the Chief Planner, Ben Ponton, the intention of the new draft Territory Plan and District Planning Strategy is to make the ACT planning system simpler. Whilst simplification of the planning system is a good aim, we seek clarification of how the outcomes-based model will work in practice. For example, how will the Government ensure that the legislation has strong legal standing when there is reliance on an opinion of the outcome of a development rather than rules.

Allowing a planning system to be based on outcomes as the main consideration for approval is a departure from past planning bills. We are concerned that owners, architects, builders and developers will be encouraged to take shortcuts with their projects knowing the focus of the development is to meet outcomes approved by a small approval team in the planning directorate. In the opinion of ONCC the subjective language in the draft Territory Plan and supporting documents needs to be replaced with more legally binding language that sets out the rules of what may happen on a particular site.

ONCC considers that a small team who approve development applications in this city on subjective information needs to have strong protection for their decision-making by the language used in the Territory Plan and supporting documents. A system with few rules leaves itself open to misinterpretation. We are concerned about the future cost to purchasers to rectify “bad builds” in a system lacking robust and clear rules. This cost already has impacts in our community under the present system; with less emphasis on rules there is likely to be more significant impacts.

The Technical Specifications have been developed around building requirements however these Technical Specifications are not binding as in the words of the document “it could be referred to demonstrate compliance with the Territory Plan”. (Pg 2 of Technical Specifications November 2022). This again goes back to our concern for the team of public servants not being supported in their decision-making process because of the subjective language throughout the documents.

ONCC is in favour of being a part of the efforts to participate in the population growth of our city but professional evidence needs to be presented to the community on what is being proposed for the streets of Old Narrabundah. The information and maps presented on the “Have Your Say” process for Old Narrabundah have been misleading because all the documents held by EPSDD have not been disclosed to the community. Maps buried deep within the EPSDD website shows different detail to the maps and documents in the Draft Territory Plan and the pamphlets provided at the one and only pop-up session that Old Narrabundah was allocated. The maps on the EPSDD website reveal large areas of Old

Narrabundah now zoned RZ1 marked as future investigation areas with one street possibly being marked for up to six storey development. (Although this is difficult to ascertain due to the lack of clarity in the maps and diagrams. Residents cannot make informed comment on these proposals if the correct detail is not given to them during consultation.

An addition to the proposal for Old Narrabundah is the inclusion of residential in our CZ6 zones without any consultation or reasons given to the community. (Draft Territory Plan Part A Part D4: Inner South District Policy Narrabundah). This included use does not appear to be added in CZ6 zones anywhere in the city so should not be included as a use for the CZ6 blocks in Narrabundah without consultation with the Narrabundah community. (refer Fig 15) Old Narrabundah should be allowed to protect the unique and limited key infrastructure blocks we have for the future commercial use for all the city.

As part of this District Strategy process other things that Old Narrabundah residents consider important need to be taken into consideration. For example:

- Maintaining the green streetscape that we highly value
- Safer transport connections to neighbouring areas in particular bicycle paths
- Future use of public facilities – school, ovals, parks
- Future thinking around blending of Social Housing properties into the Old Narrabundah Community
- Protecting the early design measures of our loop streets.

ONCC Inc supports the call for the protection of our Heritage areas. A professional Heritage Team or Council needs to be involved in any Development Application that is lodged on a heritage site. The decisions made by those experts needs to form part of the binding Development Application approval.

It is imperative that protected trees on individual blocks are preserved. The removal of these trees must not be allowed just for a development to take place. If, after proper professional assessments, a tree is given approval to be removed it must be replaced with a species capable of reaching equivalent height and width somewhere on the block being developed. Strong penalties must be enforced if a development does not comply, this is the only way to preserve our existing tree canopy in residential areas, particularly in the older parts of the city.

ONCC is concerned about protections for neighbours of a development with less emphasis on rules applying and more emphasis on outcomes. Under the new draft Territory Plan neighbours must continue to have protections around their rights to access to sunlight in their private open space, access to sunlight for solar installations, security around their privacy and being overlooked.

ONCC does not object in principle to basement car parking (helps keep cars off the street) but we do support the design of basement car parks remaining within the building envelope to preserve access for deep rooted plantings and vegetation on the remainder of the block. Section 39 in Old Narrabundah has been redeveloped to cover two thirds of the available blocks and this has left a totally inadequate area available for water to penetrate the soil. This is something that should not be allowed in residential zones in the future and we don't believe the draft documents will protect us from this happening again.

Media coverage over this Draft Territory Plan consultation period has extended into promoting approvals for dual occupancies in RZ1 areas. This topic has not been consulted on with the community however Narrabundah has many Mr Fluffy blocks that have been

developed as dual occupancies and they would be a good base to provide evidence-based research for planners to investigate. We are not certain that the community would support wholesale sell ups of residential blocks in a section of RZ1 areas for dual occupancies.

Old Narrabundah Community Council

Serving the Community

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GNCA SUBMISSION ON TERRITORY PLAN AND DISTRICT STRATEGY

Summary

The Government has been working on this new planning system for several years and claims that it “*will deliver better outcomes for communities, the environment and people across Canberra. The reforms include a new Planning Act, new district strategies and a new Territory Plan.*”

Unfortunately, the new planning legislation is seriously flawed.

The GNCA does not see the need for the proposed changes which are poorly conceived, poorly explained and dangerous. They are unnecessarily complex and will cause confusion and uncertainty. The introduction of discretion in applying “outcomes” has the potential for corruption.

For example, the Planning Act. If you don’t get the Object of the new Act right, what hope is there?

The 2007 Act had a very simple Object, which everyone can understand:

*“The object of this Act is to provide a planning and land system that contributes to the orderly and sustainable development of the ACT—
(a) consistent with the social, environmental and economic aspirations of the people of the ACT; and
(b) in accordance with sound financial principles.”*

The Object of the New Act covers two full pages and does not explain what is meant by “outcome focused”.

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

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

The rationale for sweeping changes should explained

The role of the community should be increased

A planning system should serve the needs of the residents. The new system abolishes pre-DA consultation, without any explanation.

Residents will not be able to review what is built next to them. Consequently, there will be less certainty as to what can be built than there is now. Residents need certainty and trust.

The new system should be based on sensible mandatory rules

There will be fewer rules in the new system. Plot ratio, solar access, mandated planting space and private open space will be abandoned. These are the essential parameters that shape the city

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

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

The system should be re-designed, so that there are more checks and balances

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

We build on our heritage, it is much more than a few selected sites.

Heritage should play a more important role in the new planning system

Detailed analysis

Introduction

1. The Griffith Narrabundah Community Association (GNCA) (ABN 26503486416) is a not for profit, voluntary community based organisation operating in the Griffith Narrabundah area. The objects and purposes of the Association are “to protect the amenity and interests of the Griffith and Narrabundah communities, particularly in relation to the preservation of community facilities and open space”. The Association has 450 members. The GNCA is a member of the Inner South Canberra Community Council (ISCCC).

2. The GNCA endorses the Development Assessment Forum (DAF) *Leading Practice Model for Development Assessment in Australia*. It strongly opposes the developmental vandalism envisaged in the “future investigation” areas in Griffith and Narrabundah.

Process

3. Respect for the rule of law is a bedrock of society. In the process of preparing the new planning laws, and the content of the planning documents, the government is manipulating the law. A government should act in the interests of the public.

4. The consultation on the planning documents has been insufficient for such an important change to our city.

- It is a well-known cynical tactic to release consultation documents over the holiday period to reduce the number of comments. That is what has been done here. There should be a longer consultation period.
- The documentation is 2500 pages, and the explanatory documents are superficial and inadequate. A further period for consideration of such lengthy documentation is needed.
- The My Say website has not been kept up to date for comments. In any event they appear to be mainly ideological rather than substantive.
- The maps that were provided are inadequate. Further consultation with informative maps should be provided.
- Important parts of the planning system are not yet available including the design guides. Further consultation with all the material should be provided.
- Some important concepts are unclear. For example, what does “called up” mean? If the documents that can be called up have no legal effect on documents with higher status what is their role?

These changes are unnecessary

5. “If it ain’t broke, don’t fix it.”¹ The current ACT planning system could be improved but its basic structure works well. A planning system needs to be fair, clear, consistently applied, as simple as possible and honest. The government has not shown the need for the proposed overhaul. And the community was never asked what was wrong with the current system.

6. The changes proposed are extensive and will cause inevitable confusion, disruption, loss of productivity and potentially, a lack of planning control, while the implementation is occurring.

7. In 2005 the Development Assessment Forum (DAF) produced *A Leading Practice Model for Development Assessment in Australia*. That is largely being followed at present. Why can’t this continue? The proposed laws deviate from it in many respects and there is no justification for it.

8. If planning laws are seen on a pendulum swinging between free reign for developers and no change in the status quo, the government has decided to move the pendulum significantly in the developers’ favour. While the discussion paper on developer regulation is welcome it will not solve the fundamental issues. Similarly changes to heritage arrangements are no panacea. The GNCA recommends adapting current laws after proper consultation.

The effect of the changes

¹ Attributed to Bert Lance, Director of the Office of Management and Budget in President Carter’s administration

9. The GNCA has the benefit of a case study by a former planner in which he analyses the impact of the proposed new laws compared to the current laws.² The GNCA has studied his analysis in relation to DA in Griffith on which it sought review by ACAT of a decision to approve. The result in that matter was that the Tribunal was not satisfied the DA was consistent with the Planning and Development Act and Territory Plan and was not satisfied that it could be made consistent with conditions.³

10. The proposed development was in Lockyer Street, which is one of the “significant” streets in Griffith⁴ - one of the oldest suburbs in Canberra.⁵

11. The GNCA was concerned to discover from the analysis that:

- We would have had to consider 37 pages of the District Policy to eventually find it wasn't relevant; and
- We would have had to consider technical specifications, including checking whether they had been changed; and
- We would have had to consider supporting material, although this is undefined, including checking whether it had been changed; and
- We would have had to consider the 28 pages of TS1 Residential technical specifications; and
- If the supportive housing units lacked solar access or sufficient private open space to have reasonable amenity we would have had to search beyond the technical specifications to find how we might persuade the decision maker that these are important for comfortable living conditions; and
- We would have had to check the District Specifications because although, at present, they only protect the Manor House development in Griffith from further assessment they may have been changed; and
- We would have had to apply the zone policy – policy outcomes that have been changed to make it easier to change the streetscape and desired character of this significant Griffith street. Because there has been no explanation for this change we would have no supporting documents on which to rely; and
- When applying the Multi Unit Housing Development Code (MUHDC) we would look at the assessment outcomes. This would lead us to the supporting material (undefined) and design guides which are not yet available; and
- Because these are new laws, we would have had to cross check everything.

² Submission by [REDACTED] 15 February 2023 Case Study 1 at p.7

³ GNCA & Leo Cusack v ACTPLA * Commissioner for Social Housing AT 37/2022. Decision of 22 December 2022. Reasons not yet published.

⁴ *Griffith Neighbourhood Plan* ACTPLA 2005 p.26

⁵ *Griffith Neighbourhood Plan* ACTPLA 2005 p.5

And, in answer to those who argue that the GNCA should not have the right to seek review of a DA decision, we repeat that ACAT overturned the decision to approve the DA because, after extensive analysis, the Tribunal could not see how the DA could comply with the law, even if conditions were imposed.

Third party rights of review

12. There is insufficient protection of third party rights of review in the draft Planning Bill and the draft subordinate laws do not remedy the lack of protection. Community associations act to ensure that the law is followed and protect neighbourhoods against abuses in the planning processes. They must be assured of merits review of a decision on a DA in their neighbourhood on which they have made a representation. In addition, third party review assists in fulfilling the role of merits review in improving primary decision making.

8. Currently community associations that lodge a representation under the Planning and Development Act (PDA) have the right seek review of a decision on the DA. This is because of the operation of s.409 of the PDA. Schedule 4 of the PDA includes interested entities and also defines material detriment. In the current PDA and the draft bill there is a difference between an *eligible entity* and an *interested entity*. Community associations are interested entities: an association whose objects and purposes include protection of the local neighbourhood from planning abuse would come within the definition of interested entity.

13. The draft bill gives eligible entities the right of review of a decision (s.502 – previously s.408A). An eligible entity in relation to a DA includes the lessee and sublessee: see s.500 (previously s.407) and an entity mentioned in schedule 6, part 6.2, column 3 (previously Sched 4 col 3). The draft bill does not specifically give an interested entity a right of review. The current PDA s.409 is now replaced by s.503 headed *applications for review by third parties* and it only applies to eligible entities. However, the draft bill still has sections that imply that interested entities have rights of review:

- they receive reviewable decision notices (s.501(b))
- s.500 says an *interested entity* means an entity mentioned in schedule 6, part 6.2, column 4 (previously Sch 1 col 4)
- The definition of material detriment in schedule 6 refers to an entity that has objects or purposes (such as community association).

14. In any event, merits review of administrative decisions focusses on the application of the law to the facts. With the introduction of the exercise of discretion by decision makers it is likely that dispute resolution litigation will occur in the courts – as history has shown in other jurisdictions. As yet, it is unclear how much merits review will be available.

Accountability of discretionary decisions to guard against corruption

*Discretion, when applied by a court of justice, means sound discretion guided by law. It must be governed by rule not by humour; it must not be arbitrary, vague and fanciful but legal and regular*⁶

15. If the system is going to move to discretionary decisions based on outcomes there will need to be a significant shift in accountability measures and training of decision makers. Discretion plus secrecy plus money inevitably lead to corruption. The GNCA recommends steps to guard against corruption.

16. The proposed outcomes-based system of decision making introduces discretion. The full panoply of discretions have not yet been revealed and the rules and guides for their exercise are still unknown. What is known is that there is limited trust in planning decision making.⁷ In these circumstances, to maintain respect for the rule of law in civil society the GNCA recommends:

- i. Guidelines on the exercise of discretion in determining whether a DA satisfies outcomes.⁸
- ii. A system of internal review of complaints about decisions on outcomes. For example, a complainant who suffers material detriment from a decision based solely on outcomes should be able to seek internal review; and
- iii. A record in the *Annual Report* of how many complaints were made and the number of complaints each decision makers received (without personally identifying the decision maker; and
- iv. An undertaking from the government that a review of the system of decision making based on outcomes will be undertaken after eighteen months of the operation of the new system;

INNER SOUTH DISTRICT STRATEGY (ISDS)

17. The ISDS is manifestly inadequate:

- There is very little infrastructure for the benefit of Inner South communities
- It purports to convey what is special about the Inner South but does not adequately address heritage. The Blue Green Network concentrates on the environment and heritage listed sites without acknowledging, in any way, the heritage in the streetscapes of Griffith and Narrabundah
- In the maps the description “community facilities” includes schools. This has implications for traffic, pedestrians, safety, housing, parking, shops and other facilities. It is incomprehensible that planning documents do not recognise

⁶ Lord Mansfield (1858) Ch, 25 Beav 140.151. Since Lord Mansfield said this about courts decision making by administrative bodies has significantly increased. The words are equally applicable to administrative decision making. Nathan Isaacs ‘The Limits of Judicial Discretion’ Yale Law Review 32(4) Feb 1923 p.339-352

⁷ Inner south .

⁸ E.g., WA Ombudsman Guidelines on the exercise of Discretion in Administrative decision making.

schools. There are at least 15 schools⁹ in the Inner south with almost 10,000 students ranging in age from 3 to 18. There are also at least 10 childcare centres.

- It is impossible to adequately comment on the Draft Strategy in relation to the East Lake development which is obviously a key part of the strategy but a the details are unknown.

18. The GNCA endorses the ISCCC Inner South Canberra District Planning Strategy of 2021 which does a much better job of providing a locally aware strategy.

Heritage

15. The ISCCC has made a submission to the Legislative Assembly Committee inquiry into ACT heritage arrangements.

16. The Strategy begins with a future vision for the Inner South. The future vision should start by saying the goal is to preserve the unique features of the Inner South and they include its heritage. The document shouldn't start with East Lake.

17. The Strategy discusses cultural, natural and ecological heritage but there are two main problems. First, heritage is not included as a “driver” and is insufficiently recognised in the drivers that are listed. Secondly, the Inner South’s heritage is insufficiently described (see p. 87)

18. The five drivers include heritage only within the blue-green network (pp 74,145) but heritage should also be recognised in the strategic movement, sustainable neighbourhoods and inclusive centres and communities.

19. The cultural heritage emphasis is confined to “heritage sites” (see pp 87,112,127). The Inner South has more heritage than the national institutions and railway heritage (p.87). More of the ISCCC Strategy heritage description should be used including:

- The precincts of Barton, Kingston, Griffith and Forrest are some of the oldest in Canberra
- The earliest large permanent building (Kingston Powerhouse)
- The earliest shopping centres (Kingston and Manuka)
- Walter Burley Griffin’s street layouts (include his name)
- Charles Weston’s plantings (include his name)
- 1950’s/1960’s architecture, houses with heritage design elements

⁹ Using the 2018 schools census: Forrest primary (550); French Australian pre school (143); Red Hill primary (725) (2nd largest in Canberra); Yarralumla (460); Telopea Park High (853); Alfred Deakin High (877) (2nd and 3rd largest in Canberra); Narrabundah college (939) (3rd largest in Canberra); Canberra Grammar primary (911) (highest in Canberra independents); St Bedes (300); St Benedict’s (143); Canberra Girls Grammar Junior (596) Canberra Grammar senior (754) Girls Grammar (682) St Edmunds (441) and St Clare’s (720).

Facilities

Once again, the Strategy perpetuates the myth that Inner South residents are “close to higher order facilities and services in the City and Woden Town Centre” (p.89).

Higher order facilities include Access Canberra shopfronts and public libraries with proper facilities such as several computer terminals. To reach these services Griffith and Narrabundah residents and those who work in a quarter of ACT jobs (p.87) have to cross the physical barriers of a lake or a hill - by car or bus.

Traffic

Traffic is modelled at 80-90% capacity in parts (p.89). How is traffic modelled? That is, if there is an increase of 12 thousand more dwellings and more businesses how much more traffic can be expected?

District Specification DS 4 Inner South

1. Supporting Material that can be “called up” includes District Specifications contained in Volume C.
2. The Manor House I Griffith at Block 6 Section 31 is singled out with its own special specification. It is preceded by the words:

The following specifications provide possible solutions that should be considered in planning, placing, designing and using buildings for proposed development in ...

3. These words, when read with the introductory words to the specifications, show that the carve out is designed to facilitate the compliance of this listed developments. The introduction states:

District specifications contain provisions that support compliance...These provisions assist proponents to prepare their development proposals...

4. There is no explanation in the planning documents for the special treatment of this block in the middle of an RZ1 zone in the suburb. Of course, the GNCA is aware of the background to the demonstration housing initiative that has involved the allocation of significant resources for, apparently, the “outcome” of one development so far, so it assumes that this planning document is designed to achieve another “outcome.”

5. A proponent demonstrating compliance with the Plan will cite the control (general issue) and specification (that has been given to them as a possible solution).

6. These specifications are also said to have the following roles:

- They are used in conjunction with the Inner South District Policy
- They provide solutions for aspects of DA’s or certainty
- They may be used as a reference or benchmark for technical matters when preparing DAs

- It seems that entities may cite them to the Authority to provide support to a DA

7. The GNCA suggests that the need for these extraordinary special measures in the proposed planning laws highlight the unusual nature of the proposal that was opposed by many local residents. The development is clearly more suited to the nearby RZ2 zone – not the middle of a settled RZ1 zone adjacent to a school. It is never desirable to manipulate, or disregard, or ignore, the law to achieve a single outcome.

“William Roper: “So, now you give the Devil the benefit of law!”

Sir Thomas More: “Yes! What would you do? Cut a great road through the law to get after the Devil?”

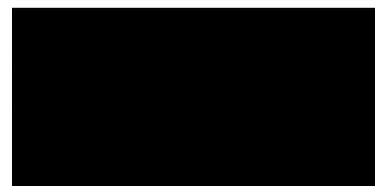
William Roper: “Yes, I'd cut down every law in England to do that!”

Sir Thomas More: “Oh? And when the last law was down, and the Devil turned 'round on you, where would you hide, Roper, the laws all being flat? This country is planted thick with laws, from coast to coast, Man's laws, not God's! And if you cut them down, and you're just the man to do it, do you really think you could stand upright in the winds that would blow then? Yes, I'd give the Devil benefit of law, for my own safety's sake!”¹⁰

The Future

We live in the age of value-for-money. In a value-for-money environment, citizens take the rule of law and the democratic authenticity of the state largely for granted. ... Instead they judge their rulers on their perceived contribution to their own prosperity and well-being. Public leadership in such a world becomes ... transactional. Citizens pay taxes, vote in legislatures and, mostly, obey the law. They are perfectly willing to do all that, so long as they feel their efforts are met by governments keeping their part of the bargain: providing safety, prosperity, care, sustainability and all the many other things they say they will. In a value-for-money society, we judge government first and foremost by its results.¹¹

The new planning system will deliver better outcomes for communities, the environment and people across Canberra. The reforms include a new Planning Act, new district strategies and a new Territory Plan.”



, President, Griffith Narrabundah Community Association
3 March 2023

¹⁰ Robert Bolt *A Man For All Seasons*

¹¹ Paul 't Hart, “Epilogue: Rules for Reformers” in E.A. Lindquist, S. Vincent and J. Wanna, *Delivering Policy Reform, Anchoring Significant Reforms in Turbulent Times*, (ANU E Press, 2011) one at 201 at 201-2.



REID RESIDENTS' ASSOCIATION INC.

info@reid.northcanberra.org.au

AO 1247

The Reid Residents' Association Inc. (RRA) wishes to thank the ACT Government for the opportunity to comment on the ACT Planning System Review and Reform.

The RRA is one of the oldest continuing resident associations in Canberra and has taken an active interest in planning matters over some 77 years. Most of the area of Reid lies within the Reid Housing Precinct (Entry 20023, ACT Heritage Register, *Heritage Act 2004*). This suburb was designed based on an Australian interpretation of C20th 'Garden City' principles for a planned subdivision and has retained the values which enabled its heritage classification. Reid remains one of the largest and finest examples of these principles in Australia. We note that the term 'elements' is used in denoting what are more correctly referred to as heritage 'values' which are set out in Entry 20023 to the ACT Heritage Register.

These principles have stood the test of time as Reid is one of the coolest suburbs in Canberra (CSIRO, 2017, 'Mapping surface urban heat in Canberra', www.environment.act.gov.au/__data/assets/pdf_file/0005/1170968/CSIRO-Mapping-Surface-Urban-Heat-In-Canberra.pdf). Reid is cool because of both the ratio of built form to planting area and Weston's plantings that established stunning streetscapes of wide-canopied long-lived trees. It is pleasing to note that The Canberra Spatial Plan states that 'Garden City principles' are values to be retained (apps.actpla.act.gov.au/spatialplan/4_goals/4D_sense_of_place/index.htm).

Comments on the Draft New Territory Plan and the Draft Inner North and City Strategy

For effective sustainability and adaptive capacity, the draft New Territory Plan requires informed understanding and knowledge of the impacts of climate change. This needs to encompass a biodiversity network using evidence-based ecological science and technology that is inclusive of requisite resources and infrastructure needs. These issues are not addressed in the Draft New Territory Plan.

Modelling, using publicly divulged assumptions, is required to frame a methodical and integrated approach to the complexity needed in planning for the future. What is the estimated carbon footprint of the anticipated building involved in the new Territory Plan? This and other projections are not manifest in these documents. Providing the information and estimations involved in the proposed changes to the planning regime would demonstrate transparency of decision making and assist in producing greater trust in the planning system. Estimates of Canberra's future population are just one component of the complexity involved.

Given the new work and energy paradigm the proposed directions for the New Planning Framework underpinning the District Strategies and the ACT Planning Strategy 2018 should be reassessed and incorporated into the planning process.

With regards to 'Liveability', we need to see evidence of planning with the capacity to address what OECD states are 'Risks across natural, economic and social systems [that] threaten future well-being'. (OECD (2020), 'Executive summary', in *How's Life? 2020: Measuring Well-being*, OECD Publishing, Paris. DOI: <https://doi.org/10.1787/ea714361-en><https://www.oecdbetterlifeindex.org/media/bli/documents/ea714361-en.pdf>)

Like most of Australia, Canberrans have contended with increasing intensity and frequency of weather events, epidemics (human), fire, smoke pollution, interrupted supply chains and logistics and reduction in locally produced food. Obviously, many of these crises and emergencies go beyond ACT borders.

However, how well do the proposed changes to the Planning system measure up to OECD's Better Life index and would actually work to increase our levels of resilience? A well-designed and effectively managed planning system should go further than is currently set out in these documents. We need to plan future development that mitigate these risks and future-proof Canberra as well as current technology and science can provide.

We endorse the strongly supported proposal for a planning commission and it would be crucial to include First Nations membership to ensure First Nation advice underpins future planning initiatives.

The draft New Territory Plan and the draft Strategies need to be tested using available technologies such as the C40 Adaptation and Mitigation Interaction Assessment (AMIA) tool to analyse the proposed radical changes. This tool looks at 'a range of policies for potential mitigation and adaptation synergies and trade-offs, as well as potential mal-investment risks and piggybacking opportunities' (www.c40knowledgehub.org/s/article/Adaptation-and-Mitigation-Interaction-Assessment-AMIA-tool?language=en_US).

Radical changes to the statutory system such as abolishing Zone objectives will result in most unfortunate consequences that will impact negatively on the character, amenity and quality design outcomes. The proposed 'outcomes' approach to planning will inevitably lead to an 'open to developer interpretation' when assessing quality design.

Clarity of retaining a rules-based system (like the rest of our legal system) is essential in planning frameworks. Planning framework components, including Technical Specifications, used for assessment should be statutory. Without a statutory planning framework and with a diminished ACAT, there is no perceivable capacity for residents/citizens to appeal against the design guides as they are fundamentally just 'guides'.

Checks and balances are required to ensure integrity, probity and accountability in a rules-based system in line with our Australian system of government and governance. The powers of the planning authority, which already reside in a single unelected person, the Chief Planner, answerable only to the Planning Minister under the draft Planning Bill, need to be subject to scrutiny by the Legislative Assembly.

The powers of the Legislative Assembly, elected by the population of the ACT, and of its review body the ACT Civil and Administrative Tribunal, would be greatly reduced by the draft Planning Bill, draft District Strategies and draft New Territory Plan. How could residents/citizens seek redress against poor 'outcomes'?

The Planning Bill 2022 s47 needs to be amended to reflect the provision of the Planning and Development Act 2007 namely 's108(2) The planning strategy is not part of, and does not affect, the territory plan.', and the District Strategies should not be referenced in the legislation.

'Mandatory' and 'mandated' are words used in these documents and these are terms that are not ambiguous (please see Macquarie and Australian Oxford Dictionaries). Specifications and requirements are either mandatory or subject to the discretion of the Authority.

More time is required for genuine community engagement – consultations were superficial, often residents were not provided with answers from the officials present and maps were inadequate.

To protect the edges of the Heritage listed Reid Housing Precinct there should be no further densification other than the built form (height and building footprint) that currently exists along Ainslie

Avenue/Allambee Street and Amaroo and Booroondara streets i.e. not increasing this height to the proposed 3 and 6 storeys.

Comments on the Draft Inner North and City District Strategy (DINCDS)

There appear to be cartographical changes to Reid in the Draft Inner North and City District Strategy. The DINCDS (p. 85) takes in two parts of Reid – the former Bega Flats site and Amaroo Street – the latter of which is already sign-posted as ‘City’ rather than ‘Reid’ on the road sign nearest Glebe Park. See also DINCDS p. 86 where these parts of Reid are described as ‘City/Town/Group/Local Centres’ – no longer ‘residential’ areas. Further, on DINCDS p. 66 the SW half of Reid is coloured blue (‘Town/City Centre’).

Have these changes been gazetted, and post codes altered?

The DINCDS shows ‘Future Investigation Areas’ (p. 99) which in Reid include all residential leaseholds between Amaroo & Booroondara streets, as well the Argyle Square and Monterey medium density residential developments. The Statutory boundary of the Reid Housing Precinct lies at the southern boundary of leased properties on Booroondara Street and both sides of the street trees are listed on the ACT Trees Register even if the houses on the southern side are not (www.cityservices.act.gov.au/__data/assets/pdf_file/0007/390409/PTR087-Group.pdf).

Given some of these ‘constraints’ it would be ideal if we could be told what is to be investigated.

The DINCDS Figure 39: Inner North and City – Sustainable neighbourhoods map (p.115) shows four orange-coloured ‘Urban Centres’ (this term is not defined, Glossary on p. 155) in Reid: the first two, mentioned as Future Investigation Areas above, plus a new one on the NW side of the intersection of Currong & Coranderrk Streets in Reid and one at what appears to be the end of Amaroo Street.

What comprises such ‘urban centres’ and what measure is being used to classify an area as an ‘urban centre’? This requires clarification.

The low rise, low density character of Reid, most of which is within the Reid Housing Precinct, is highly valued by residents should be retained, together with its heritage, biodiversity and empirically recognised coolness as established by the 2017 CSIRO Urban Heat Mapping (www.environment.act.gov.au/__data/assets/pdf_file/0005/1170968/CSIRO-Mapping-Surface-Urban-Heat-In-Canberra.pdf).

We require continued legislated Heritage protection of:

- Reid Housing Precinct
- Reid Park
- Dirrawan & Geerilong Gardens
- Railway Reserve/Easement adjacent to Amaroo St.

Further, for the streets adjoining the Reid Housing Precinct we require:

- no rezoning of Amaroo & Booroondara streets which would result in multistorey blocks totally inappropriate in this area or on Allambee Street’s eastern edge which are principally Identified dwellings, see p. 24 Reid Housing Precinct (www.environment.act.gov.au/__data/assets/pdf_file/0010/148474/462.pdf).

The Draft Inner North & City District Planning Strategy identifies what the community value about the Inner North and City. There is no mention of the Civic Pool complex and there is no mention of the various

sporting facilities including Reid Park's Sports Ground which also lies within the heritage precinct. It is surprising these amenities have not been included. These are highly valued by residents in the surrounding areas.

There are a number of dot points that are somewhat difficult to interpret. For example:

- *Further detailed analysis and modelling to identify future housing needs not able to be met by change areas across Inner North and City District*
- *Detailed analysis and planning for Inner North and City future investigation areas to accommodate future housing and facilitate desired urban character based on suitability and transect analysis and opportunities in identified 200m/400m stop-to-centre connection areas.*

Community (Reid) reaction

The following points have been made by our residents. Overall, the documents are:

- jargon-ridden – plain English would be welcome
- proposing the replacement of rules and criteria with an 'outcomes' laissez-faire regime spells shambles-ridden planning
- light on the impacts for resident leaseholders of the likely consequences of the changes wrapped up in the proposal
- proposing a curtailing of the appeal rights of private citizens and community groups is undemocratic
- maps are blurry, difficult to interpret, overloaded with colours and information
- pop-up engagement was inadequate, planners not available to ask questions in many instances and more legible maps not available
- difficult to find all the necessary bits and pieces
- why such a plethora of pop-up engagements when there was no time prior to the closing date for submissions for the publication of notes taken during these 'listening' sessions?
- the processes involved have been, and continue to be, far too rushed
- this looks like an authoritarian system
- this looks like a system already inadequately resourced attempting to manage future unknowable 'outcomes'.

In view of the internationally recognised drivers relating to our future wellbeing and, indeed, survival, currently, the ACT Planning System Review and Reform (Draft New Territory Plan, the Draft Planning Bill and Draft Inner North and City Planning Strategy etc.) do not measure up to the urgency required for the future of our area for the next century.

While there must be other reputable and authoritative sources, we strongly recommend applying the technologies involved as cited in the following references:

1. 'Integrating Climate Adaptation: A toolkit for urban planners and adaptation practitioners' (www.c40knowledgehub.org/s/article/Integrating-Climate-Adaptation-A-toolkit-for-urban-planners-and-adaptation-practitioners?language=en_US)

2. Niki Frantzeskaki, Timon McPhearson, et al. 2019, 'Nature-Based Solutions for Urban Climate Change Adaptation: Linking Science, Policy, and Practice Communities for Evidence-Based Decision-Making', *BioScience*, Volume 69, Issue 6, pp. 455–466, (<https://doi.org/10.1093/biosci/biz042>).

Considering the planning undertaken by the Griffins, undoubtedly par excellence for the time, it is perhaps now time for another international planning competition to take Canberra, our national capital and the ACT into the next century.

President
Reid Residents' Association Inc.
info@reid.northcanberra.org.au



Submission to Environment, Planning and Sustainable Development Directorate, February 2023

ACT Planning System Review and Reform - Draft New Territory Plan and Draft District Strategies

Thank you for the opportunity to provide comment on ACT Planning System Review and Reform - Draft New Territory Plan and Draft District Strategies.

Southern ACT Catchment Group (SACTCG) is an umbrella not-for-profit organisation that supports 29 community member groups and rural landholders in the Southern ACT area since 2003. SACTCG works with the local communities to develop and deliver environmental projects in line with both community and government priorities. We actively build new volunteer groups to care for local natural places such as pocket parks and reserves engaging the neighbouring communities and support and promote their work. SACTCG also facilitates education, public awareness, and communication of environmental issues such as urban water education and biodiversity in the suburbs.

SACTCG understands the need for planning reform to accommodate future populations in the ACT and to improve its liveability under the pressures of a changing climate. SACTCG recognises the gravity of these documents as the backbone of a future Canberra. Planning reform offers an opportunity to engage and activate community to work with Government to create a future Canberra that is a model for other jurisdictions, that benefits Canberrans and the natural environment that we depend on for our wellbeing. We believe that with an already strongly engaged community, it is possible to achieve a balance between development, improved liveability, and the protection of our valuable ecological communities and species.

SACTCG, as a local network and hub for the community in southern Canberra, have received a multitude of comments and concerns from our members regarding the consultation process. Those that attended sessions all noted the information provided was too generalised in content, and that they had less understanding following attendance, and more concerns over the potential implications for biodiversity and personal wellbeing. Many stated that they believed the documents were deliberately obfuscating. This poor consultation process has increased mistrust in the community who are concerned the proposed reforms have a simplistic priority of facilitating development. SACTCG offered to run a focused session for our members to clarify issues raised but were told by the planning team that they did not have the capacity to attend. This would have allowed planners to address specific concerns regarding the impact of the proposed reforms on the natural environment, biodiversity, and community wellbeing.

Consistent comments from the community have included:

- The current documents have poor accessibility and comprehensibility: the lack of clarity and purpose of the multiple documents, and complex cross referencing is difficult to understand.
- The accuracy of the mapping and underlying data, including population targets, is unclear.
- The mapping is too coarse in scale to understand the implications at a neighbourhood level.
- The documents contain generalised motherhood statements and vague language reducing confidence in the documents.
- The blue green network should consider native species habitat as well as human needs.
- The documents are not fit for purpose.



Whilst SACTCG sees the draft Territory Plan as an improvement on the previous Plan, significant additional work is needed to prevent future loss to our local biodiversity, agricultural lands, and cultural heritage sites. It is suggested that the plan refer to the impact planning will have on biodiversity values in the ACT and respond to the recent recommendations in the State of Environment Report.

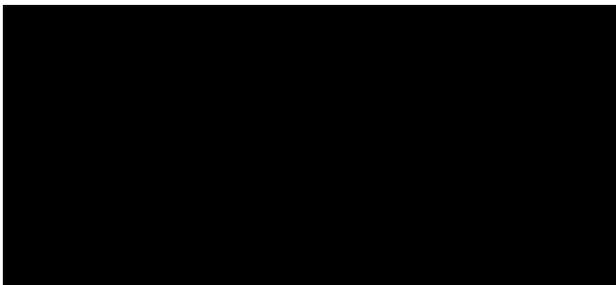
The 'blue green network' in the draft District Strategies is welcomed. However, it does not include areas outside of conservation lands or corridors and in places contradicts areas of urban development. The plan for this network requires significant modifications to be based on more accurate data, incorporate biodiversity values, and provide neighbourhood level detail overlaid with ACTmapi. Further work is required to identify remnant ecological communities and wildlife corridors and collaborate further with the Connecting People Connecting Nature Program currently being run by EPSDD. Importantly, there is an opportunity to further increase ACT's environmental stewardship through co-design of the 'blue green network' at a neighbourhood and district level.

SACTCG supports the focus on infill rather than greenfields development, however we are concerned for the pressure on off-reserve areas with conservation value (including Natural Temperate Grasslands, Yellow Box-Blakely's Red Gum Woodlands and individual mature trees). An example of this is the plan for potential development of Blewitt's Block. Recent visits to this site from our staff ecologist have noted the significant high conservation value and species diversity. SACTCG are currently supporting a new stewardship group at this site due to its community interest and biodiversity.

In conclusion, we would like to note that we strongly support the more detailed submission made by the Conservation Council ACT Region.

If you would like to discuss any aspects of this submission, don't hesitate to contact me on [REDACTED] or by email at [REDACTED]

Yours sincerely,



Executive Officer
Southern ACT Catchment Group

ACT Planning System Review and Reform Project

Draft Territory Plan and Draft District Strategies

As community-based organisations we have fielded a significant quantity of communication from a broad range of Canberrans. Many concerns raised were specifically with the consultation process which was not sufficient to satisfactorily inform the community of the plans for their suburbs and protection of local environmental assets. In particular there have been many comments on the lack of co-design with the community and paucity of clear understandable information provided in these documents. Many groups have sent in more detailed submissions which further outlines these concerns and recommendations.

Our organisations do not believe that the mandate identified on page 41 in the District Strategies as follows can be met by the changes to the legislation or directions:

The protection of heritage and biodiversity values is mandated by ACT Government and Australian Government law and should be a primary consideration in all planning and development decisions.

1. The Planning Bill omits the intention to protect biodiversity in the ACT. Protection of biodiversity should be a core intention of the Planning Bill thus it is recommended this be forefront in inclusion. Once enacted the Planning Bill will be the main legislation under which decisions impacting the environment are made on a day to day basis in the ACT.
2. There is no land use policy identified for the protection of off reserve conservation areas under the draft Territory Plan; effectively, the land use zones in the draft Territory Plan have not changed since it was first developed. They are outdated and do not recognise that:
 - i) Many conservation areas containing Critically Endangered Ecological Communities and threatened species occur outside the reserve system, including on Urban Open Space, other unleased land, along easements and on rural and urban leasehold land.
 - ii) Unless in reserved land, there are no provisions for protection of these areas or directions for management for ecological outcomes or restrictions of recreational or other land uses.
 - iii) It is unclear how the ACT Nature Conservation Act interrelates with the Planning Bill and Territory Plan.
3. The draft District Plans are presented as providing the final arbitration for future use for the next twenty years. However, the maps are not fit for purpose:
 - i) There is reduced direction provided to developers on what they can't do, so that there are likely to be more proposals for development on conservation areas, and more cumulative impacts, not less.
 - ii) Overlays with the exception of future urban areas have been removed. Identification of off-reserve conservation areas and potential reserved areas are unclear, given they are not identified in the draft Territory Plan as requiring protection.
 - iii) The maps are at too coarse a scale to examine particular areas/sites; most conservation areas have been omitted, while some are specifically but ad hoc included; there are inconsistencies between maps, there are concerning overlays that might or might not be errors. The mapping must recognise that the need to protect other areas may arise.

Recommendations:

1. Ensure the Planning Bill is amended to include the recommendations of the ACT Legislative Assembly Standing Committee on Planning, Transport and City Services Report on the Inquiry into the Planning Bill 2022 dated 22 December 2022 relating to environmental matters (recommendations 38 to 46).
2. Ensure protection and enhancement of biodiversity is seen as an 'outcome' of the various planning instruments, including explicit reference in the objects of the Act and a suitable mechanism to facilitate such biodiversity protection and enhancement is included in the Act, with subsequent flow through to a new Territory Plan and (proposed) District Strategies.
3. Do not finalise the draft Territory Plan and draft District Strategies until the final revised form of the Planning Bill has been developed by the ACT Government, and only following amendments and further consultation which may be appropriate based on the revised Bill:
 - i) Give primary consideration to protection of heritage and biodiversity values during planning processes.
 - ii) Include a category of land use in the Territory Plan that enables Conservation Areas outside the reserve system to be protected, managed for ecological outcomes and at the same time, to retain compatible land uses.
 - iii) Provide more accurate and complete district plans at a range of scales, including a full set of overlays and a process for amendment over time.

Sincerely

Friends of Grasslands Inc
ACT Landcare
Conservation Council ACT Region
Southern ACT Catchment Management Group
Ginninderra Catchment Group
Canberra Ornithologists Group
ACT Urban Woodland Rescue
ACT Herpetological Association
Kuringa Woodland Landcare Group
Cooleman Ridge Parkcare Group
National Parks Association
Field Naturalists of Canberra

COMMENTS ON DRAFT DISTRICT STRATEGY: TENNIS SPECIFIC.

Tennis ACT would like to provide the following inputs on the ACT Draft District Strategy. These inputs are based on extensive participation data overlaid with demographic information in each of the main areas of the City, as captured in the Tennis ACT Facility and Participation Plan which can be found at the following link:

<https://acrobat.adobe.com/link/review?uri=urn:aaid:scds:US:cf15b945-5978-4ed1-8b35-dbe7d1cc5819>

We have also endeavored to provide very short and concise inputs specific to each of the identified regions. If there are any questions or areas where further clarification of the Tennis ACT inputs are concerned, we remain available to provide these.

EAST CANBERRA

This area has a low residential component, and the few residents are located in areas that are sufficiently serviced by clubs in NSW – Queanbeyan, Jerrabomberra & Googong.

BELCONNEN

This area has two main deficiencies:

The Belconnen Town Centre is densifying at a rate that is outstripping the availability of courts at the Belconnen Tennis Club. The addition of courts at this club or the improvement of the clubs at the Canberra High School are required to address the shortage of courts.

Belconnen continues to expand to the West, incorporating parts of NSW in new developments. The expansion of the Molonglo region to the border of Belconnen and the dearth of facilities in that area is placing increased strain on Kippax Tennis Club in Holt, which is already unable to cater to the needs of West Belconnen. The expansion of the Kippax Tennis Club is seen as a priority.

GUNGAHLIN

As the fastest growing region in the ACT, Gungahlin has been dependent on scattered school tennis facilities which have only catered to informal play. There remains no community tennis club in this region. 4 courts having been upgraded at Gold Creek School are massively oversubscribed and residents are forced to travel for social and competitive play, as well as coaching.

The new facility in Amaroo scheduled to open in 2024 will somewhat alleviate the pressure, but additional courts in this region will definitely be required to meet the ever-increasing demand.

INNER NORTH & CITY

This region is well provided with tennis facilities, however the majority date back to the 1960's and have age-related deterioration that will need to be addressed.

INNER SOUTH

This region is well provided with tennis facilities, however the majority date back to the 1960's and have age-related deterioration that will need to be addressed.

MOLONGLO VALLEY

This new area located between Weston Creek and Belconnen does not have a single planned public tennis facility. At present the residents of this area are required to travel to either Weston Creek or Belconnen, placing additional strain on already stretched venues.

TUGGERANONG

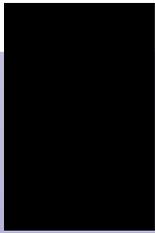
The Tuggeranong valley in its entirety is serviced by only the Kambah Tennis Club and The Pines Tennis Club in Chisholm. While the Vikings Club can cater to the needs of some social players it has no competitive or coaching offering. The Pine Tennis Club has been identified as an ideal area for the addition of four tennis courts to service the southernmost areas of the City. Potential players are currently being turned away from social, league and coaching opportunities.

WESTON CREEK

The Weston Creek Tennis Club has been earmarked for expansion and bringing these plans to fruition would meet the needs of this area, were it not for the fact that there are no facilities in the adjacent Molonglo area. If no additional facilities were planned for the Molonglo Valley, any population increases in that area would again result in a shortage of facilities.

WODEN

This area is reasonably well provided for in terms of tennis facilities, however much like the central suburbs, a number of these are showing signs of age-related deterioration and will be requiring renovation and upgrading in the short to medium term.



ACT Tennis Facility and Participation Plan



PLANNING FOR TENNIS IN THE ACT

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DRAFT

SECTION 1: EXECUTIVE SUMMARY

The following report is a strategic review of tennis facilities in the ACT with consideration of the changing demographics over the next 10 years. It has a focus on analysing the Australian Bureau of Statistics, Statistical Area 3 regions of Belconnen, Gungahlin, Molonglo, North Canberra, South Canberra, Tuggeranong, Weston Creek and Woden Valley. The key findings of the review can be broken into infrastructure and management issues / opportunities for these regions.

A current snapshot shows tennis in the ACT and region is thriving with **32,679 participants** recorded for 2018-19 (an increase of 19% on 2017-18). This is on the back of **106% growth** for the previous 12 months (2016-17 to 2017-18). 2019-20 was impacted significantly by bushfire activity / smoke haze and COVID-19 so not all reporting was completed yet growth is a remarkable result.

	2016-17	2017-18	2018-19	2019-20
Total Participants	13,373	27,570	32,679	32,731
Growth		106%	19%	0.2%

The main contributors to this growth have been via participation priorities with Tennis in Schools and Book A Court. Some 71 primary schools had tennis embedded in their curriculum in 2019-20. Combined with secondary schools a total of **23,441 children** had a positive tennis experience via the program delivered in their curriculum. The split of girls and boys is almost 50/50 in the ANZ Tennis Hot Shots program. The schools program is creating new levels of demand and need for club facilities. It is critical these kids are transitioned to tennis facilities and further participation programs. As it relates specifically to Gungahlin there are currently 8/11 primary schools and 3/4 secondary schools delivering tennis at the school via the curriculum, yet no tennis facilities to link to.

Unique casual Book A Court users rose **71%** (non members) with a total of **45,095** bookings made in 2019-20 across all facets.

The insights and recommendations found within this report are based on the analysis of Tennis ACT registration data from My Tennis (affiliated club membership), Book A Court (online tennis court booking system), Cardio Tennis (fitness focused participation program) and ANZ Tennis Hot Shots (children's participation program). This data has then been overlaid with the statistical data from the 2016 census to identify variations against the population and state program averages to identify issues and opportunities by specific region and program. The report is supported by the Microsoft Excel file *TACT Data Dashboard*, which provides summaries of the data and tools for data segmentation.

Canberra continues to experience significant population growth with new suburban land releases in Gungahlin, Molonglo and Belconnen. This will see the population grow by 17% over the next 10 years. **The most recent new tennis facility constructed in the ACT was The Pines Tennis Club, which opened in 1986. Since then Canberra's population has grown from 250,000 to 400,000.** This has led to a significant undersupply of tennis courts in Belconnen, Gungahlin and Tuggeranong, and in the next 10 years it will also become an issue in the Molonglo region. Gungahlin is the region of most immediate need, as it was identified in the 2016 census as the second-fastest growing region in Australia. Gungahlin is the only region of the top 9 fastest growing regions of Australia not to have the provision of tennis facilities. **The construction of a tennis facility in Gungahlin should be a high priority for Tennis ACT.**

In addition to population growth, the closure of the Hawker Tennis Centre (2012) and the sale of the Tuggeranong Tennis Centre (2005) have compounded the shortage of courts and programming in Belconnen and Tuggeranong. These privately owned and (professionally) operated facilities provided comprehensive programming, competition and talent development opportunities beyond what is available at a volunteer community club. The Tuggeranong Tennis Centre was redeveloped as Mpowerdome, a multi-sport facility and continued to provide enhanced participation opportunities, but its recent closure has further reduced the Tuggeranong communities access to tennis courts and programs. **Maintaining the provision of tennis courts at Mpowerdome and delivering a wide variety of tennis programs at the facility should be a high priority for Tennis ACT and the Tuggeranong community.**

To help alleviate the deficiency of tennis facilities in growth regions, Tennis ACT and ACT Government should work together to open up access to the wider local community to tennis courts in schools outside of school hours. Other sporting groups are provided access to school facilities (playing fields and gyms), but tennis has not been provided this opportunity. Access should not be limited to casual hire, but should also include coach and club supervised programs to ensure optimal use of the facilities and a better distribution of programming throughout the local community. This should

be an immediate focus in Gungahlin and Tuggeranong to help alleviate the shortage of courts and programming in those regions.

The traditional annual membership model for participation in tennis is on the decline. Volunteer Committee Clubs need to adapt their membership offering to be more appealing to modern consumers. This should include an enhanced program offering in partnership with their coach and a variety of membership opportunities that are appealing to their local demographic. The success of the Tennis World - Canberra Tennis Centre Private / Public Partnership suggests a fortnightly direct debit model is more desirable than the annual lump sum fee. **Venues should explore professional management models to make them less reliant on volunteers and explore membership models utilised by the leisure industry that include greater market segmentation, regular periodic direct debit options and auto renewal / opt out membership strategies.**

As traditional volunteer community club membership continues to decline, venues need to adapt to provide more pay-for-play opportunities, low commitment participation opportunities and be able to capture revenue from these activities. Moving to a professional management model is a good option for District Tennis Centres or larger, but Local Tennis Centres lack the critical mass for this to be an attractive option in the ACT market. **In consideration of this issue, Tennis ACT should consider support for centralised enrolment and delivery of low commitment programs and pay-for-play opportunities that can be allotted to Local Tennis Centres that don't have the resources to provide this service.** Book a Court is an example of this approach working and should continue to be rolled out to all venues, but Tennis ACT should consider this approach for social tennis and other low commitment organised competitions, introductory group lessons, Cardio Tennis and other participation opportunities.

Following the 2015 Strategic Facility and Management Review, ACT Government have indicated that existing facilities will only be eligible for the current Active Canberra grants program and no additional pool of funding will be made available to address the aging infrastructure. The review recommended significant additional funding be made available to set venues on the path to sustainability and address major issues with the standard of facilities. **This was not supported by ACT Government and funding will be available through the established grants program on a case by case basis. Tennis ACT continues to advocate and continues to be very active as noted with commitments from all parties in the lead up to the 2020 ACT election. Further advocacy continues with the "Sustainability and Investment in ACT Community Tennis Clubs" paper and recent Venue Sustainability Rating (VSR) data.**

The demise of the Asset Repair and Maintenance Scheme (ARMS) has increased the importance of Community Tennis Clubs becoming sustainable without external funding. There is now a much greater importance for venues to operate in a way that meets their asset repair and maintenance costs. The focus of future ACT Government funding will be on making capital improvements to facilities. This presents an opportunity for, or will require facilities to, make changes to their operational model that coincide with capital improvements. **Tennis ACT and ACT Government should work together to develop a robust process for managing Government funded capital works implemented by the community tennis clubs, to ensure the best value of the works and ongoing compliance with the funding conditions and any associated management improvements linked to the funding.**

An update of the 2013 audit of Tennis ACT affiliated facilities should be conducted. At the same time, Tennis Australia's *Four Pillars Assessment Tool* should be used to assess all the current affiliated venues. Tennis ACT has made further investment in this critical area with the employment of a dedicated Facilities & Planning Manager to assist in delivering on these priorities.

A better spread of Tennis Australia Facility Hierarchy is highly desirable, given the large number of Local Tennis Centres (4+ courts). **Any new facilities should be of at least District Tennis Centre (8+ courts) size and ideally Large Community Centre (12+ courts) size, due to the greater efficiencies of a 12-court facility¹.** With an increased importance on sustainability, ensuring facilities have the appropriate number of courts, amenity and management model to suit their local demographic is increasingly important.

There is a very high number of existing facilities operating under a Volunteer Committee Club model. The venues operating these facilities should consider the implementation of professional management to improve the service delivery, amenity, variety of programming and ease the current burden on volunteers. In parallel, **Tennis ACT need to increase the expertise of local coaches in venue management and club operations**, as well as consider supplementing the local pool of coaches with interstate professional venue operators to ensure there is sufficient expertise to successfully manage more venues requiring professional management.

Existing tennis venues should plan to improve their amenities to cater to modern consumer needs. There is a lack of Canteen/Kiosk/Café and Pro Shop facilities in tennis venues in the ACT, severely limiting revenue opportunities and basic

¹ Identified by the Tennis Australia Operational Health Check National Benchmarks

amenity. Venues should consider transitioning their management model to be able to provide these services, increasing their services to consumers, while also providing additional revenue streams to subsidise operational expenses.

The current provision of tennis facilities across the ACT contrasts with the ACT Government's *Active 2020 Strategic Plan*. There is insufficient provision for the current population, given that there hasn't been a new facility constructed in over 30 years. This needs to be addressed immediately, but also in consideration of future population trends.

1.1 Infrastructure

1.1.1 Issues

- There is an insufficient number of tennis courts in select regions to meet the Tennis Australia recommended court to population ratio of 1:2,000. This is inhibiting participation in the sport. The following number of courts are required to be constructed or made available for tennis programming to meet the target by 2020:
 - Gungahlin 42
 - Tuggeranong 29 (with Mpowerdome closed)
 - Belconnen 26
 - Molonglo 7
 - Weston Creek & Woden Valley 2
- The majority of tennis infrastructure in the ACT has not been adequately maintained. The 2013 tennis facility audit identified \$11.5m would be required over the next 10 years to bring tennis facilities up to an appropriate standard. This investment is well beyond the capacity of the tennis facilities to fund without significant support from external sources. There has been no significant increase in funding since the audit.
- There is currently a high saturation of Local Tennis Centres and a lack of medium to larger venues. This limits the opportunity for professional management and diversification of programs to meet the community needs.
- There is an undersupply of indoor tennis courts in the ACT. Only 4 courts are currently available in North Canberra at the Canberra Tennis Centre.
- Tennis venues in the ACT currently have a lack of amenity to support a diversity of programming and meet modern consumers expectations for leisure activities. Clubhouses and surrounds are extremely dated and do not provide an appealing environment.

1.1.2 Opportunities

- Enhancing and developing existing tennis facilities by increasing amenities and courts will provide a wider range of facility types under the Tennis Australia Facility Hierarchy. This is likely to make venues more sustainable and leverages existing investment while also providing greater amenity to the local community.
- The provision of new indoor courts in Gungahlin and the reopening of the Mpowerdome in Tuggeranong, would provide the provision of indoor tennis facilities in the north, central (Canberra Tennis Centre) and south. This geographic spread would provide better access for the community to indoor tennis facilities.
- Improving the management of tennis facility asset maintenance and capital works could provide a decrease in operational and capital costs.
- The opening up of access of existing school tennis courts and non-affiliated venues to tennis programming for the whole community could somewhat reduce the need for the construction of new tennis courts.

1.2 Management

1.2.1 Issues

- The traditional 'one-off payment annual membership' model is plateauing or in decline.
- Community tennis clubs government fees and charges are categorised under the commercial rates category and a 5-year exemption of the fixed rates charge was initially provided however a review of rates is requested.
- Under the current lease arrangements, community tennis clubs are required to pay 100% of the maintenance and repair costs of the tennis clubs facilities.
- Some tennis venues need to further consider Tennis Australia's *Four Pillars of Successful Tennis Venues* in the management of their facility and improve in providing accessibility, community benefit, sustainability and accountability.
- Further tennis coaches with the appropriate skills to professionally manage tennis facilities need to be developed.

1.2.2 Opportunities

- A significant boost in tennis club membership could be achieved by tennis venues adopting best practise membership models from the Health and Leisure industry – fortnightly or monthly direct debit with auto renewal, greater market segmentation, membership retention programs and integrated programs and services should all be considered.
- Tennis ACT could implement centralised programming and participation opportunities to assist volunteer managed tennis venues with the administrative burden of providing a greater diversity of programming to meet a modern consumer's needs.
- ACT Government have indicated they will explore options for legislative amendments to provide a permanent exemption on fixed rates charges for community organisations like tennis clubs that have limited revenue opportunities (no general liquor licence or gaming machine licence).
- ACT Government have indicated a willingness to explore alternative lease arrangements for community tennis clubs that may release them from the burden of managing repair and maintenance of the asset.
- Tennis ACT is creating a resource (Facilities & Planning Manager) to focus on improving management of tennis venues and assisting community tennis clubs in satisfying the requirements of the *Four Pillars of Successful Tennis Venues*.
- A review of all tennis programming in the context of current gaps in service delivery and Operational Health Checks will provide excellent insight into program development and implementation across the Territory.
- Attracting professional venue managers from interstate could lift industry standards and provide training pathways for coaches to develop venue management skills.
- If more tennis venues move to professional management models it will ease the burden on volunteers and allow them to redirect their time and energy into other activities, e.g. working bees, social events, fundraising drives, club culture and identity etc...

1.3 Recommendations

Section 4 of this report provides a number of key priorities under the three key areas of Participation, Club/Venue Management and Infrastructure. These key priorities align with the Tennis Australia national strategy, Tennis ACT's state strategy and all important recommendations for improving tennis participation in the ACT. In addition to these recommendation, this report has highlighted 13 more specific recommendations based on the tennis participation data for the ACT and other specific local considerations.

- ***There is currently a very poor geographic spread of affiliated tennis facilities in the ACT. With no facilities in Gungahlin and Molonglo. Tennis ACT and ACT Government should make it the highest priority to ensure there is appropriate access for local communities to tennis facilities. Construction of tennis facilities in Gungahlin should be the highest priority, but also ensuring an appropriate geographic spread of tennis courts that are consistent with the Tennis Australia guidelines for court to population ratio of 1:2,000. That is one court per 2,000 people.***
- ***A better spread of Tennis Australia Facility Hierarchy is highly desirable. Any new facilities should be of at least District Tennis Centre (8+ courts) size and ideally Large Community Centre (12+ courts) size, due to the greater efficiencies of a 12-court facility (as identified by the Operational Health Check benchmarks).***
- ***Venues should explore professional management models to make them less reliant on volunteers, which in turn allows volunteer time to be focused on other key areas. The Facilities & Planning Manager should survey the venues with the Tennis Australia Services Sheet to gain more granular data.***
- ***In consideration of the current court to population ratio inclusive of workforce commuters plus density / infill ambitions, it is recommended rationalisation should not be considered, unless there are significant extenuating circumstances, such as failure to comply with the lease conditions, the club entering administration or irreversible asset failure and disrepair.***
- ***The five year exemption on fixed rates charges was initially provided however this was set to expire on 30 June 2018 yet has been acknowledged and extended. A review of rates is requested. It needs to be a priority that ACT Government considers this a permanent exemption to the fixed rates charges as a minimum however further review and solutions should be explored.***
- ***Tennis ACT should assess all current affiliated tennis venues with the Four Pillars Assessment Tool and assist the venues with addressing any identified issues.***

- *There should be a concerted effort between Tennis Australia, Tennis ACT and the affiliated tennis venues to improve Book a Court system data to include accurate gender, date of birth, postcode and primary place of play. The program should continue to be implemented at all affiliated venues, including public courts and schools. It's ability to open up the courts to the community through an easy online booking process, capture revenue for the club or venue operator and capture participation data will be valuable to the future of the sport and should continue to be a high priority.*
- *A review of the barriers for delivery and participation of Cardio Tennis should be conducted to understand whether they are preventing greater implementation of the program. It appeals to an important market segment, so efforts for greater participation should be explored prior to abandoning the program.*
- *Tennis venues need to consider their membership value proposition and associated programs in relation to the demographics in their immediate region, the participation by life stage and modern consumer's needs. Currently, the overwhelming majority of tennis venues provide an annual lump sum membership, requiring annual renewal. This causes a barrier to renewal, is now antiquated and not best practise in the health and leisure industry. Venues should consider membership models that operate on a fortnightly direct debit with auto renewal. Tennis ACT should ensure that the My Tennis & ClubSpark systems support this model and assist venues in making the transition. Ease of administration is vital for Volunteer Community Clubs and it may be that they need to move to a professional management model to implement these type of changes in membership model. A professional management model also allows a greater diversity of programming and could improve the standards of facilities and asset management.*
Canberra Tennis Centre needs to engage and convert the high percentage of members in the Childhood life stage into the ANZ Tennis Hot Shots program.
- *Tennis ACT should continue to monitor participation rates, retention / churn and player satisfaction for Canberra Tennis League competition and where appropriate react and adapt to feedback from the playing community. A variety of competition formats and in-house competitions should be considered to supplement the current Canberra Tennis League offering.*
- *The Tennis in Schools program needs to continue its current strategy of targeting regions with lower participation opportunities and look to improve its conversion rate by facilitating strong partnerships with local coaches delivering programs in nearby clubs.*
- *Venues should plan to improve their amenities to cater to modern consumer needs. There is a lack of Canteen/Kiosk/Café and Pro Shop facilities severely limiting revenue opportunities and basic amenity. Venues should consider transitioning their management model to be able to provide these services.*
- *Another audit of tennis facilities should be conducted ASAP and should be conducted every 5 years. This should be conducted utilising the Tennis Australia templates.*

In addition to the 13 recommendations, sections 3.4.2 to 3.4.8 provide a range of specific regional recommendations based on Infrastructure, Management, Age, Gender and Program insights specific to each region.

SECTION 2: STRATEGY BACKGROUND

2.1 About this document

The *ACT Tennis Facility and Participation Plan* has been prepared by Rock Consulting & Marketing in conjunction with Tennis ACT, the ACT Government and Tennis Australia.

This document identifies the potential future demand for tennis across the ACT and reviews the current network of tennis facilities, their management and access arrangements and future infrastructure requirements. In addition, it investigates the potential constraints on local tennis participation and development across the ACT. A key driver of the *ACT Tennis Facility and Participation Plan* was the need to better understand the key requirements for growing participation in tennis over the next 4 years and to establish a framework for provision that ensures the long-term sustainability of tennis clubs, venues, programs and activities. It has a focus on analysing the Australian Bureau of Statistics, Statistical Area 3 regions of Belconnen, Gungahlin, Molonglo, North Canberra, South Canberra, Tuggeranong, Weston Creek and Woden Valley.

The *ACT Tennis Facility and Participation Plan* builds on existing strategic planning and directions developed by tennis, government and community stakeholders and reflects data and information specifically collected and analysed for this Plan.

The insights and recommendations found within this document are based on the analysis of Tennis ACT registration data from My Tennis (affiliated club membership), Book A Court (online tennis court booking system), Cardio Tennis (fitness focused participation program) and ANZ Tennis Hot Shots (children's participation program). This data has then been overlaid with the statistical data from the 2016 census to identify variations against the population and state program averages to identify issues and opportunities by specific region and program. The report is supported by the Microsoft Excel file *TACT Data Dashboard*, which provides summaries of the data and tools for data segmentation.

Tennis ACT acknowledge the support and assistance provided by Tennis Australia and all other individuals, tennis clubs, venue operators and tennis community stakeholders that participated in project consultation and data collection activities.

2.2 Project background

The *ACT Tennis Facility and Participation Plan* has been developed using *Planning for Tennis in your Local Government Area: A resource from Tennis Australia*, which was created in 2016 to support the comprehensive and consistent planning for tennis across a diverse range of local government areas within Australia.

This builds on the Tennis ACT and ACT Government jointly commissioned independent *Review of Tennis Facilities in the ACT* in 2009 and the 2015 *Strategic Tennis Facility and Management Review*, which included a full audit of Tennis ACT affiliated tennis facilities in 2013.

The key driver of the strategy is to address a shortage of tennis facilities in population growth corridors in the ACT and the sustainability of existing tennis facilities in the region.

2.2.1 Recent participation trends in the ACT

The *Participation in Sport and Active Recreation, Australia 2011-12* report shows a 2.5% decline in participation nationally between 2005-06 and 2011-12. The study identified tennis as a top 10 recreational activity in both organised and non-organised participation with a national participation rate in 2011-12 of 4.2%. **This study was limited to participants 15 years and over.**

More recently, the 2017 *AusPlay Survey* conducted by the Australian Sports Commission identified an estimated 13,100 (3.9%) people in the ACT aged 15 years and over participated in tennis. Approximately 8,100 (4.9%) were male and 4,900 (2.9%) were female. Tennis featured as a top 10 activity in the ACT. The survey's reporting on children's (14 and under) participation is limited to organised physical activity outside school hours and does not provide a state based breakdown. Nationally, the survey found children's participation in tennis to be 6.0% of the population (Girls 4.8% & Boys 7.1%), ranking it 8th overall.

Supporting these bodies are the internal measures and metrics used by Tennis Australia and Tennis ACT which factors in all age ranges and shows a very strong growth trajectory which has been further enhanced by the Tennis in Schools

program and Book A Court. This is evidenced by the 13,373 participants recorded in 2016-17 which jumped some 106% to 27,570 in 2017-18 (with significant increases in Schools participants and Book A Court players). This was then surpassed by a further 19% with 32,679 participants recorded in 2018-19. This figure is more closely aligned to the recent Sport Aus data.

Tennis participation can be diverse, from casual participants playing with friends and family right through to elite players competing in tournaments and competition. Tennis ACT, Tennis Australia and the local tennis facilities offer a wide variety of participation options to appeal better to the modern consumer than the traditional tennis club membership. However, club membership is still a significant option for access to participation, particularly in the ACT. The 2010 Gemba tennis participation study identifies that the ACT has a higher percentage of participants who are members of tennis club, 16% compared to the national average of 12%. However, this traditional model of access is plateauing or in decline, particularly in a one-off annual fee model and a more modern direct debit and/or flexible model needs to be explored to retain the appeal of membership. This has been demonstrated by the recent redevelopment of the Canberra Tennis Centre and its direct debit option, as well as its operational model. In addition, the high percentage of membership in 2010 may be reflective of the lack of alternative options to access tennis facilities, which has since been alleviated through the addition of programs like Book a Court and facilities transitioning to professional management models.

2.2.2 Recent Tennis ACT affiliated club membership

Tennis ACT has 25 affiliated tennis facilities in the ACT, 2 associations and 3 affiliated facilities in the immediate surrounding region in NSW (Queanbeyan, Jerrabomberra and Bungendore). The overwhelming majority of these facilities are Local Tennis Centres (4+ courts) operating under a Volunteer Committee Club model.

Over the last 20 years there has been growth in membership of Tennis ACT affiliated tennis venues. In 1999, there were 3,181 members of 18 affiliated venues (average club membership 177), whereas in 2005 there were 4,757 members of 23 venues (average club membership 207) and in 2017, there are 5,996 members of 26 venues (average club membership of 231). However, it is important to note that 42% (2,528) of these club members in 2017 are members of the Canberra Tennis Centre, which opened in 2015 and is operating under a private public partnership model. Excluding the Canberra Tennis Centre, there are 3,468 members of 25 venues (139 members per club). **This highlights the decline in club membership for community tennis venues that are operating under the traditional Volunteer Committee Club model and the boost in membership that can be achieved through the redevelopment / development of modern tennis facilities operating under an operational model more appealing to modern consumers.**

2.2.3 Recent financial investment into tennis facilities by ACT Government

The ACT Government has invested significantly (\$7.15m) into the \$28m redevelopment of the Canberra Tennis Centre, a National Tennis Centre operating under a Private / Public Partnership model. This investment was based on a successful business case that included the release of Tennis ACT land for infrastructure in Southwell Park, an \$18m partnership with Next Gen Clubs Australia, a suite of events with an estimated \$13.7m in economic benefit to the Territory over 3 years, and \$2.85m investment from Tennis Australia and Tennis ACT. In addition to the \$7.15m capital investment, the ACT Government continue to support the redevelopment with the Sports Loan and Interest Subsidy Scheme (SLISS), which provides annual support for the repayment of Tennis ACT's commercial loan.

This newly redeveloped facility has resulted in a significant spike in membership, from 181 members in 2011 to 2,528 in 2017 (1,297% growth).

Most Community tennis facilities have been heavily reliant on grant funding from the Active Canberra Sport and Recreation Grants Program to remain sustainable. Historically, they have been receiving dollar for dollar funding from the Capital Assistance Program (CAP), with the overwhelming majority of this funding going to the replacement of synthetic grass court surfaces and other asset repair and maintenance activities. In 2014, ACT Government introduced the Asset Repair and Maintenance Scheme (ARMS) to help fund these activities. Unfortunately, in 2017 the ARMS grant program was eliminated, leaving a significant challenge for community tennis clubs to become sustainable without the supplementary funding available through the grants scheme.

The graph below details the funding provided to tennis facilities through the Sport and Recreation Grants Program. The SLISS funding shown is exclusively for the Canberra Tennis Centre.

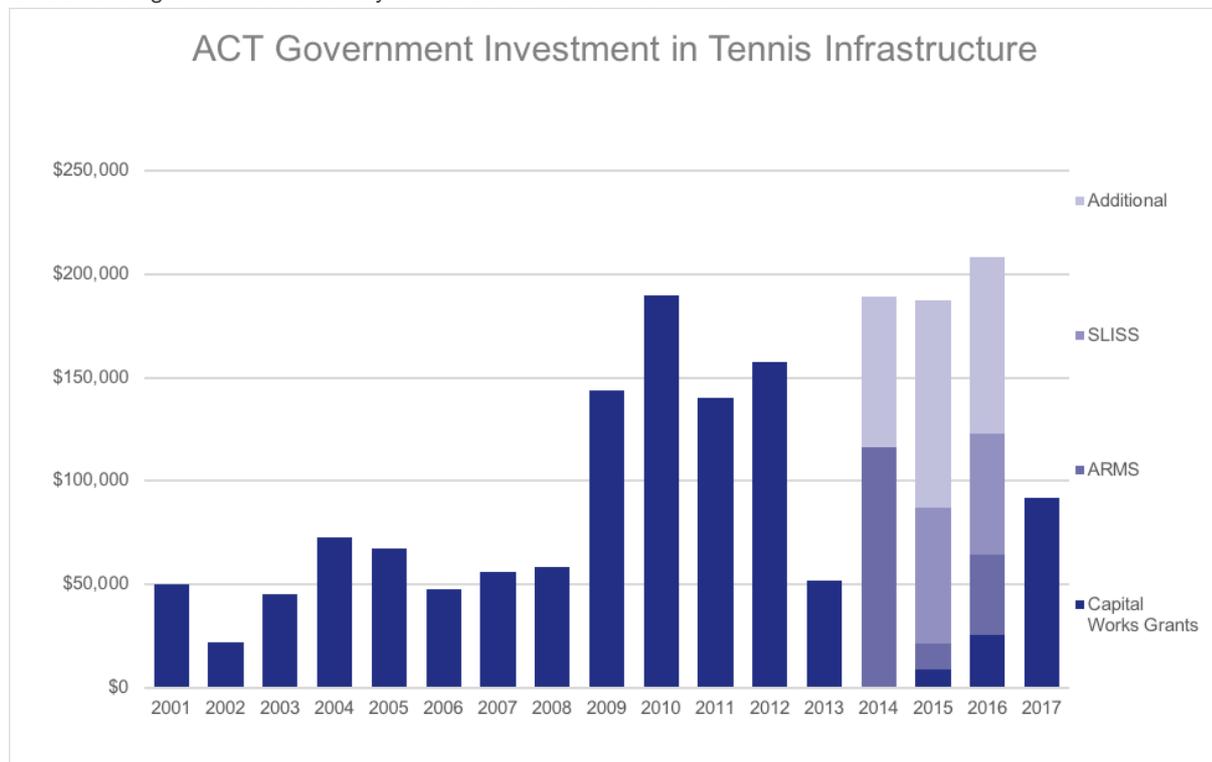


Figure 1 - ACT Government Investment in Tennis Infrastructure 2001 - 2017

In 2017, the Sport and Recreation Grants Program operated with a pool of \$2.7m in funding. The elimination of ARMS funding and the limited budget for local community sport infrastructure highlights the need for community tennis clubs to be sustainable and not rely on external funding to meet their lease requirements for asset repair and maintenance.

The facility audit conducted in 2013 during the *Strategic Tennis Facility and Management Review*, identified the cost of asset repair and maintenance and capital works for bringing all the community tennis club infrastructure up to the appropriate standard as \$11.5m² over the next 10 years. The report recommended ACT Government support these works with \$9m in funding. This recommendation was not supported by ACT Government and it has been recommended by ACT Government that Tennis ACT adopt an approach of requesting support for community tennis clubs on a case by case basis through the available Sport and Recreation Grants Program.

2.2.4 ACT Government Fees on Community Tennis Clubs

The overwhelming majority of community tennis clubs in the ACT operate under a Volunteer Community Club model under the sole purpose of providing the local community access to tennis facilities for community benefit. The volunteers manage and operate the community's asset under a lease arrangement with ACT Government.

In 2009, the *Review of Tennis Facilities in the ACT* identified that a significant portion of community club revenue (up to 50% in some cases) was being paid to the ACT Government in charges and fees. When this issue was identified, Tennis ACT submitted a request to the ACT Treasurer to waive these fees and charges on the basis of a not-for-profit volunteer community organisation running an ACT Government asset for the benefit of the local community. Tennis ACT's submission was not successful and the Government fees and charges remain.

Tennis ACT continued to consult with ACT Government on this issue, which was being compounded by the fact that there is no "community" category in the rates charges, so community clubs are categorised as "commercial". This was further compounded by the Government's new tax policy to over time eliminate stamp duty and raise rates to offset the loss of stamp duty revenue. Community clubs were already exempt from stamp duty, so are not receiving any savings, but under the new policy are seeing an increase in their Government charges.

² Subsequent to the review, a detailed costing of all the required works was conducted. The 'Strategic Facility Costings', identified the costs as \$11.5m

To alleviate this issue, Tennis ACT worked with Active Canberra to address the valuation methodology for the club leases and lobby the Treasurer for consideration of a community category for rates. While ACT Government were not prepared to establish a firm policy a number of actions occurred to help alleviate this issue:

1. The third-party organisations valuing the community club leases were asked to adopt a 50% discount to the valuation calculation to acknowledge the community club's lease responsibility for maintaining the ACT Government assets; and
2. The ACT Treasurer provided an exemption from the fixed rate charges for a five year period, with a view to review the possibility of a legislative amendment to make this a permanent exemption.

Recommendation 1:

The five year exemption on fixed rates charges was initially provided however this was set to expire on 30 June 2018 yet has been acknowledged and extended. A review of rates is requested. It needs to be a priority that ACT Government considers this a permanent exemption to the fixed rates charges as a minimum however further review and solutions should be explored.

2.3 Project objectives

The key objectives of developing the ACT Tennis Facility and Participation Plan are to:

- Understand the local strategic context and the key drivers for growing tennis participation.
- Review the existing supply and capacity of tennis facilities within the ACT.
- Review existing venue management models and identify opportunities to support improved operational performance.

Understand and improve the alignment of ACT Government policies with Tennis Australia's Four Pillars to successful tennis venue management.

Provide recommendations and identify priorities for local government tennis infrastructure, community participation, club/venue management and promotion of tennis.

SECTION 3: STRATEGIC ANALYSIS

3.1 Strategic drivers for tennis

A review of the relevant reports developed by Tennis Australia and Tennis ACT, and relevant ACT Government plans, strategies and policies has been undertaken and a summary of key strategic directions and implications for the ACT Tennis Facility and Participation Plan follows.

The following documents have been analysed to inform future directions and recommendations for Tennis in the ACT:

- Tennis 2020 – Facility Development and Management Framework for Australian Tennis
- Tennis ACT Strategic Plan 2020
- Review of Tennis Facilities in the ACT (2009)
- Strategic Tennis Facility and Management Review (2015)
- Tennis Australia Strategy Review, conducted by Evello Partners (2018)
- Participation in Sport and Physical Recreation, Australia, 2013-14
- Active 2020 – A Strategic Plan for Sport and Active Recreation in the ACT & Region 2011-2020
- ACT Indoor Sports Facilities Study (2015)
- Intergenerational Review of Australian Sport 2017
- AusPlay Survey 2017
- National Sport and Active Recreation Policy Framework 2011
- ACT Planning Strategy – Planning for a sustainable city (2012)
- Community Facility Needs Assessment – Report for Stage 2 – Tuggeranong, Weston Creek and Woden (2004)
- ACT Community Facility Needs Assessment – Central Canberra, Belconnen & Gungahlin (2003)
- Civic and the Inner North Community Facilities Study Issues Paper (2001)
- Tharwa Village Draft Master Plan (2017)
- Kippax Group Centre Draft Master Plan (2015)
- Woden Town Centre Master Plan (2015)
- Mawson Group Centre Master Plan (2015)
- Weston Group Centre Master Plan (2014)
- Tuggeranong Town Centre Master Plan (2012)
- Erindale Group Centre Master Plan (2012)
- ACT Government Infrastructure Plan 2011-2021
- ACT Population Projections 2017-2041
- ACT Population Projections 2009-2059

3.1.1 Tennis ACT

Tennis ACT drives the support and development of tennis participation, facilities, club and venue management, coaching and events in the ACT and surrounding region. The key strategies guiding this support are outlined in the Tennis ACT Strategic Plan 2020

The plan provides strategic direction on the ACT and surrounding region, in the following key areas:

- | | |
|-------------------------------|--|
| 1. Participation | Objective: More people playing tennis on a regular basis |
| 2. Places to Play | Objective: Create inviting, quality and sustainable places to play |
| 3. Coaches | Objective: Increase capacity for coaches to develop tennis |
| 4. Performance | Objective: Identify and foster development of talented athletes |
| 5. Tournaments & Competitions | Objective: Provide quality competitive opportunities |
| 6. Promotion & Engagement | Objective: Promote greater awareness of tennis |

3.1.2 ACT Government – Active Canberra

ACTIVE 2020 is a long term strategic plan for sport and active recreation in the ACT and provides a blueprint upon which sport and recreation will be nurtured and promoted over the period 2011–2020. The plan promotes partnerships between industry and government and investment in long term sustainable outcomes, allowing for long term planning by sport and recreation associations in the ACT and Region.

The plan is based around seven key strategic priorities, which forms the basis of the Plan. The priorities are as follows:

- Maximise community engagement (participation) in sport and active recreation
- Greater acknowledgement and promotion of the health, education and social benefits of sport and active recreation
- Increase capacity and capability of sport and active recreation to provide quality opportunities in the ACT
- Maximise opportunities for outstanding individual successes
- Maximise opportunities for sustainable outstanding team performances
- Create Canberra's image as the "National Sporting Capital"
- Maximise supporting infrastructure and resources

The goals of the ACTIVE 2020 Strategic Plan are:

- To increase participation in competitive, non-competitive and social sport and active recreation activities at all levels
- To provide opportunities for achieving excellence in sporting performance
- To ensure access to quality and sustainable infrastructure for the delivery of these activities

Comment

Tennis ACT and Tennis Australia are committed to supporting the ACT government in the delivery of this plan, particularly through maximising the use and development of existing tennis facilities within the ACT.

A key driver of this strategy is to understand the current state of tennis in the ACT and develop a strategy, which achieves future participation growth and the development of sustainable facilities through investment into infrastructure and the implementation of suitable management practices and programming.

Through improved infrastructure, developing and providing greater access to tennis venues in the ACT it will ensure that tennis programming and activities can be accessed by a broader catchment of the ACT population.

As highlighted in this report, currently there is an insufficient geographic spread of tennis facilities across Canberra to support the Active2020 Strategic Plan. Detailed comments against each of Active2020's strategic priorities are provided in:

DRAFT

3.1.3 Tennis Australia

Tennis Australia sets the national direction for the planning and development of tennis and tennis facilities across Australia. The ‘Tennis 2020 – Facility Development and Management Framework’ sets a national policy framework for State and Territory Member Associations to develop their own state level strategic, participation and facility related planning.

With 85% of venues located on local government owned or managed land nationally, Tennis Australia recognises the importance of close collaboration with local government. To provide guidance and achieve mutually beneficial outcomes, Tennis Australia’s Places to Play (Facilities) team has developed **Four Pillars of Successful Tennis Venues**. The Four Pillars, briefly explained below, are a set of non-negotiable principles in the effective operation of tennis facilities.

Accessibility	Community Benefit	Sustainability	Accountability
<ul style="list-style-type: none"> • Provide community access to courts • Offer flexible, playing options and scheduling • Provide fair and equitable pricing options 	<ul style="list-style-type: none"> • Deliver quality community programs • Engage at all levels and with all sectors of the community • Provide opportunity for social interaction 	<ul style="list-style-type: none"> • Implement business model and practices to achieve financial sustainability • Keep well managed and maintained buildings, grounds and court infrastructure • Put plans in place for the future 	<ul style="list-style-type: none"> • Deliver and support national programs • Work with the tennis community to deliver agreed outcomes • Report regularly and consistently

Figure 2 - Tennis Australia Four Pillars of Successful Tennis Venues

Recommendation 2:

Tennis ACT should assess all current affiliated tennis venues with the Four Pillars Assessment Tool and assist the venues with addressing any identified issues.

3.2 Local community context

The ACT has a current estimated population of 396,551³, with an estimated population growth of 16.9% predicted to 2026 when the population is expected to reach 463,743.

The following table provides a breakdown of the ACT population by age for the 2016, 2021 and 2026 years.

Age Group	2016		2021		2026		Change (#) between 2016 & 2026	Change (%) between 2016 & 2026
	Number	%	Number	%	Number	%		
0 to 4	27,578	7.0%	29,129	6.8%	30,191	7.0%	2,613	9.5%
5 to 9	24,994	6.3%	27,933	6.5%	29,842	7.0%	4,848	19.4%
10 to 14	22,360	5.6%	25,552	6.0%	28,551	6.7%	6,191	27.7%
15 to 19	24,074	6.1%	25,521	6.0%	28,958	6.8%	4,884	20.3%
20 to 24	30,454	7.7%	32,114	7.5%	34,181	8.0%	3,727	12.2%
25 to 29	34,329	8.7%	33,296	7.8%	34,828	8.1%	499	1.5%
30 to 34	33,513	8.5%	34,854	8.1%	34,735	8.1%	1,222	3.6%
35 to 39	29,342	7.4%	33,685	7.9%	35,518	8.3%	6,176	21.0%
40 to 44	28,115	7.1%	29,384	6.9%	33,935	7.9%	5,820	20.7%
45 to 49	26,669	6.7%	28,535	6.7%	29,948	7.0%	3,279	12.3%
50 to 54	24,317	6.1%	26,373	6.2%	28,217	6.6%	3,900	16.0%
55 to 59	22,536	5.7%	22,988	5.4%	25,016	5.8%	2,480	11.0%
60 to 64	19,182	4.8%	20,870	4.9%	21,454	5.0%	2,272	11.8%
65 to 69	16,949	4.3%	17,626	4.1%	19,330	4.5%	2,381	14.0%
70 to 74	12,072	3.0%	15,676	3.7%	16,476	3.8%	4,404	36.5%
75 to 79	8,382	2.1%	11,057	2.6%	14,465	3.4%	6,083	72.6%
80 to 84	5,712	1.4%	7,148	1.7%	9,571	2.2%	3,859	67.6%
85+	5,972	1.5%	6,924	1.6%	8,526	2.0%	2,554	42.8%
Total	396,551	100%	428,666	100%	463,743	100%	67,192	16.9%

Table 1 - ACT Population by age 2016, 2021 and 2026

³ Population estimate and projections have been provided from the ACT Population Projections 2017-2041 released by ACT Treasury 13 March 2017

3.2.1 Age analysis

Age is a key factor of tennis participation and is the major driver for fluctuations in the demand for tennis activities and market specific programs.

The ACT and the nation's capital, Canberra is growing at a rapid rate and therefore is experiencing a wide changing demographic in different regions that are being opened to new development, compared with the long-established regions.

The tables contained in Attachment 2 – Tables & Graphs provide a breakdown of the ACT population by region and age for the 2016, 2021 and 2026 years. The Fyshwick-Pialligo-Hume region has been excluded due to the small population base and the Weston Creek and Woden Valley regions have been combined due to the nature of their size and proximity. The following summaries provide the age insights for the ACT regions.

Belconnen Age Insights

- 11.2% growth in the 5 – 9 age group will increase demand for ANZ Tennis Hot Shots (ANZTHS) programming. Specifically, introductory coaching programs.
- 20.6% growth in the 10 – 14 age group will increase demand for ANZTHS Match Play, junior and competitions / tournaments, Tennis in Schools, Talent ID and coaching programs.
- A decline in the 25 to 29 and 30 to 34 age groups indicate reduced demand for adult competition, fitness and Cardio Tennis introduction classes, higher performance tournaments and pay-for-play (i.e. Book A Court and/or professional model).
- Growth in residents aged 35 to 54 should see an increase in demand for a full range of competitive and social options, family memberships and activities, club environments and flexible opportunities.
- There is significant growth in residents over 70. Social tennis options, senior tournaments and softer surfaces (SFAG or Clay) influence participation.

Gungahlin Age Insights

- **There is significant growth in all age groups, creating significant growth in demand for all participation opportunities.**
- There is currently a high percentage of the population aged 0-9 (18.2%) and 30 to 39 (21.3%). This indicates higher than normal demand for ANZ Tennis Hot Shots, junior competition / tournaments, Tennis in Schools, Talent ID, coaching programs, a full range of competitive and social options, family memberships and activities, club environments and flexible opportunities.
- **With the population exceeding 100,000 in 2026, 50 tennis courts will be required to meet Tennis Australia's court to population target of 1 to 2,000.**
- Tennis in Schools program has had significant uptake with 8 out of 11 schools delivering tennis as part of their curriculum through the Sporting Schools program, but with no nearby venues they are unable to link effectively with a club.

Molonglo Age Insights

- **There is significant growth in all age groups, creating significant growth in demand for all participation opportunities. However, the critical mass of population for sustainable demand is likely to not occur until 2021.**
- There is a much higher average of 0 to 4, 25 to 29 and 30 to 34 year olds. This is likely to provide an increase demand for adult competition, fitness and Cardio Tennis introduction, social and evening tennis, higher performance tournaments, pay-for-play oriented (i.e. Book A Court and/or professional model), as well as a full range of competitive and social options, family memberships and activities, club environments and flexible opportunities.

North Canberra Age Insights

- There is currently a much higher average of 20 to 24 and 25 to 29 year olds. This is likely to provide an increase demand for adult competition, fitness and Cardio Tennis introduction, social and evening tennis, higher performance tournaments, pay-for-play oriented (i.e. Book A Court and/or professional model).
- The 25 to 29 and 30 to 34 age groups start to experience a modest decline after 2021, suggesting demand for the afore mentioned programs may experience slight decline.
- There will be significant growth in the 0 to 24 age groups and the 35 to 84 age groups, creating heightened demand for ANZTHS, junior competition / tournaments, Tennis in Schools, Talent ID and coaching programs, as well as a full range of competitive and social options, family memberships and activities, club environments and flexible opportunities.

South Canberra Age Insights

- There is a low base of 0 to 4 year olds and a further modest decline over the next 10 years, however there is modest growth in the 5 to 9 year olds category. Depending on current participation rates, there is likely to be an increased demand for ANZTHS and coaching programs in the next 10 years, but potentially a modest decline beyond that period.
- There is significant growth in 10 to 14 and 15 to 19 year olds suggesting an increase in demand for ANZTHS Match Play, junior Canberra Tennis League and competition / tournaments, Tennis in Schools, Talent ID, coaching programs and the transition to adult competition / tournaments.
- There is also significant growth in the 35 to 84 age groups. This should see an increase in demand for a full range of competitive and social options, family memberships and activities, club environments and flexible opportunities. Court surface choice also starts to influence participation in the 55+ age groups with Sand Filled Artificial Grass and clay preferred (clay from a development and performance point of view is more desirable).
- There is a significant decline in the 25 to 29 and 30 to 34 age groups, suggesting a decline in demand for adult competition, fitness and Cardio Tennis introduction, social and evening tennis, higher performance tournaments and pay-for-play oriented participation.

Tuggeranong Age Insights

- There is a modest decline in overall population for the region, with a significant decline in the 64 and under age groups, but significant growth in the 70+ age groups.
- The significant growth in the 70+ age groups suggest surface choice starts to influence participation, with Sand Filled Artificial Grass and clay preferred (clay from a development and performance point of view is more desirable) and social tennis is the driver for participation.
- There are significant declines in the 0 to 4, 20 to 24, 25 to 29, 30 to 34, 35 to 39, 45 to 49, 50 to 54 and 55 to 59 age groups which should see a decline in demand for Adult competition, fitness and Cardio Tennis introduction, social and evening tennis, higher performance tournaments, pay-for-play oriented, full range of competitive and social options, family memberships and activities, club environments and flexible opportunities.
- Current participation rates need to be considered in assessing the impact of the changing age demographics, as there is currently an undersupply of facilities in South Tuggeranong and program opportunities in the whole region.

Weston Creek & Woden Valley Insights

- There is an overall modest decline in population for the region.
- There is significant decline in the 0 to 4, 25 to 29, 30 to 34 and 35 to 39 age groups which should result in a decline in demand for Adult competition, fitness and Cardio Tennis introduction, social and evening tennis, higher performance tournaments, pay-for-play oriented, full range of competitive and social options, family memberships and activities, club environments and flexible opportunities.
- There is a significant increase in the 75+ age groups indicating surface choice will starts to have a greater influence on participation and social tennis will become a greater driver for participation.

3.2.2 Gender analysis

In terms of gender based participation, tennis is one of few sports that experiences a generally even split between male and female participants. In the ACT in 2017, 54% of total Club and Association membership with Tennis ACT were male and 46% female. Given this split, gender analysis of tennis participation is not a critical determinant of overall participation, but it is a very specific driver of key programs and activity types.

The Minister for Sport & Recreation, Yvette Berry MLA has announced an agenda to grow female participation in sport in the ACT. As a result, Active Canberra have added the Women’s Sport and Recreation Participation and Leadership Program to the Sport and Recreation Grant Program. This could further limit funding for sports who already experience gender equality in participation, and who have worked extremely hard to achieve this. Tennis proudly leads the way in gender equality from the top down and bottom up. No other sport offers equal prizemoney as seen at the Australian Open yet many sports are being given further funding support to create these equal opportunities.

The graphs below provide further analysis of the gender breakdown of tennis membership by ACT region.

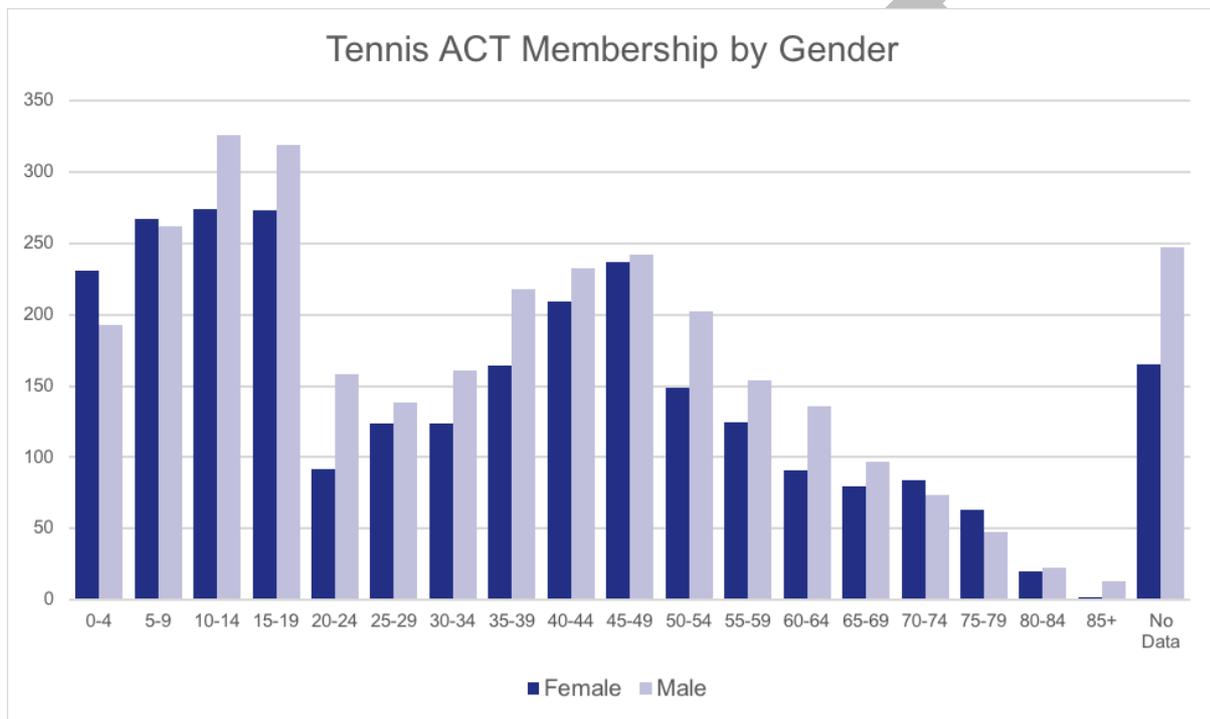


Figure 3 – ACT gender analysis Tennis ACT Membership

ACT Insights

- 5,955 members – 1.50% of population
- 2,752 female (46%) & 3,203 male (54%)
- Membership drops at the 20-24 age group, then increases to the 45-49 age group before starting to decline with age
- Highest membership group, Male 10-14 year olds (10.02%)
- Largest drop off (-66%), Female 15-19 (9.81%) to 20-24 (3.38%) year olds
- Another significant drop off (-37%) occurs between females aged 45-49 (8.61%) and 50-54 (5.45%)
- Higher female membership in starting age groups 0-4 and 5-9 year olds
- Lack of DOB data is 5.78% and may impact insights if there is a high percentage from a specific gender and age group

Belconnen Insights

- 1,058 members – 1.09% of population (lower than average)
- 474 female (45%) & 584 male (55%)
- Consistent with ACT peaks and troughs in membership
- Highest membership groups, females 5-9 (12.45%) and males 35-39 (9.76%)
- Significant growth (68%) in male members from age 30-34 (5.82%) to 35-39 (9.76%)
- Largest disparity between gender occurs in the 35-39 age group, females 35 (38%) members and males 57 (62%) members

Gungahlin Insights

- 533 members – 0.76% of population (lower than average)
- 237 female (45%) & 296 male (55%)
- Consistent with ACT peaks and troughs in membership
- Largest disparity between gender occurs in the 35-39 age group, females 13 (29%) members and males 32 (71%) members – 60-64 age category not considered due to low number of members

Molonglo Insights

- 26 members – 0.48% of population (lower than average)
- 12 female (46%) & 14 male (54%)
- Insufficient number of members for further insights

North Canberra Insights

- 1,864 members – 3.43% of population (higher than average)
- 932 female (50%) & 932 Male (50%)
- Consistent with ACT peaks and troughs in membership
- Highest membership group, Female 0-4 year olds (13.63%)
- Largest drop off (-78%), Female 15-19 (11.27%) to 20-24 (2.47%) year olds
- Another significant drop off (-49%) occurs between females aged 45-49 (8.91%) and 50-54 (4.51%)
- 10.02% of population of 5-9 year olds in the region are members and 9.27% of 0-4 year olds
- Lack of DOB data is 4.999% and may impact insights if there is a high percentage from a specific gender (6.01% male) and age group

South Canberra Insights

- 755 members – 2.86% of population (higher than average)
- 332 female (44%) & 423 male (56%)
- Highest membership group, Male 10-14 year olds (13.24%)
- Comparatively very low membership in 0-4 (1.46%) and 5-9 (4.77%) year old categories
- Very low membership in female 30-34 year olds (0.60%), both genders 30-34 (1.59%), females 40-44 (4.52%) & 50-54 (4.22%)
- High membership in females 75-79 (4.4%)
- Lack of DOB data is 10.60% and may impact insights if there is a high percentage from a specific gender and age group

Tuggeranong Insights

- 405 members – 0.48% of population (lower than average)
- 160 female (40%) & 245 male (60%)
- Highest membership group, 45-49 year olds (13.83%), 31 male members (12.65%) and 25 female members (15.63%)
- Largest drop off (-52%), Male 45-49 (12.65%) to 50-54 (6.12%) year olds
- Comparatively very low membership in 0-4 (0.74%) and 5-9 (4.20%) year old categories
- Very low membership in female 30-34 year olds (1.88%), both genders 30-34 (3.95%) and females 40-44 (5.00%)
- High membership in males 60-64 (10.20%)
- Highest growth (121%), Male 40-44 (5.00%) to 45-49 (15.63%) year olds

- Lack of DOB data is 4.20% and may impact insights if there is a high percentage from a specific gender and age group

Weston Creek & Woden Valley Insights

- 648 members – 1.15% of population (lower than average)
- 285 female (44%) & 363 Male (56%)
- Comparatively very low membership in 0-4 (2.62%) and 5-9 (1.39%) year old categories
- Higher than average number of members in the 70-74 (8.64%) age group
- Lower than average number of members aged 45 to 59 (4.63%)
- Lack of DOB data is 14.66% and may impact insights if there is a high percentage from a specific gender and age group

DRAFT

3.2.3 Demographic analysis

Tennis is a sport that is played regularly in more than 150 countries around the world. Its global appeal is evident through the range of tournaments and events played across all continents, as well as the significant influx of international visitors to Melbourne for the annual Australian Open. This event alone contributes more than \$200 million to Australia's economy annually.

Sports Marketing Surveys Inc. in collaboration with the International Tennis Federation (ITF) undertook research to better understand the demographics of tennis participants in several countries for 2015. The Australian results demonstrated:

- 2.14 million (9.9% of the population) Australians aged 6 years or older played tennis in 2015. This equates to 35,464 in the ACT. This ranks Australia number 1 globally for tennis participation.
- 1.24 million (5.8% of the population) Australians aged 6 years or older played Tennis 10 or more times in 2015. This equates to 20,777 in the ACT.
- Of the Australians who played Tennis in 2015, 51% were female and 49% were male, making tennis one of few sports that have an almost equal split between male and female participation.
- 25 to 34 year olds were the largest participant age group in Australia in 2015 (21% of tennis participants).
- Just over a quarter (26%) of tennis participants were males aged 35 plus.
- Tennis participation rates in Australia in 2015 were highest among females aged under 25.
- Almost 300,000 Australians started playing tennis in 2015 (290,000 or 14% of participants).
- There were 1.07 million female tennis participants in Australia in 2015.
- There were 1.03 million male tennis participants in Australia in 2015.

The modern Australian family has greater demands on their time and has more entertainment and sports on offer. We know the following key facts:

- 1.7 million of the 2.1 million people nationally playing tennis want to play socially with friends and family
- A further 1.3 million people who are interested in tennis say they want to pay and play in a flexible manner
- 80% of people who play tennis learn before the age of 16
- **People on average want to travel up to 11 minutes to participate in sport**
- Modern consumers have also become more adept to technology solutions, easy access to activities and more destinations that can meet multiple needs as opposed to traditional delivery of sport.

The Australian Bureau of Statistics study of *Participation in Sport and Physical Recreation, Australia 2013-14*, identifies the ACT has the highest participation rate of any state or territory at 73%. The more recent *AusPlay state/territory participation in sport and physical activity – Adults, for October 2015 – September 2016* identified the ACT as having the highest participation at 66%, compared to the national average of 59% - this percentage is calculated on participation at least three times per week. ACT participation rates by frequency were:

- 1+ per week 85%
- 2+ per week 77%
- 3+ per week 66%

While the ACT enjoys the highest participation rates in sport and physical recreation nationally, the participation rate in tennis in the ACT is lower than the national average. The 2017 AusPlay Survey identifies the adult participation rate in the ACT for adults 3.9%, compared to the 4.6% nationally. This could be directly attributed to a lack of tennis facilities in the ACT, considering the population has grown from 250,000 to 400,000 since a tennis facility has been built and there is a significant lack of courts in population growth corridors.

3.3 Tennis participation and programming

The most accurate way to measure tennis participation at the local level is to assess current local participation data from a range of sources. This report compiled data from the following Tennis Australia systems:

1. My Tennis (Club Membership);
2. Book a Court (online court booking system for members and casual players);
3. ANZ Tennis Hot Shots; and
4. Cardio Tennis.

Each system has varying quality of data, with the My Tennis system providing the most robust. Prior to analysing the data for this report, the systems were cross referenced and cleansed to provide the most accurate analysis from the available data. For this reason, the records may differ slightly from system generated reports.

To assess tennis participation by age, the most recent AusPlay survey data was applied to the 2016 population in the ACT, using the national participation rate by age group. **It is important to note that these figures do not include participation for children during school hours.**

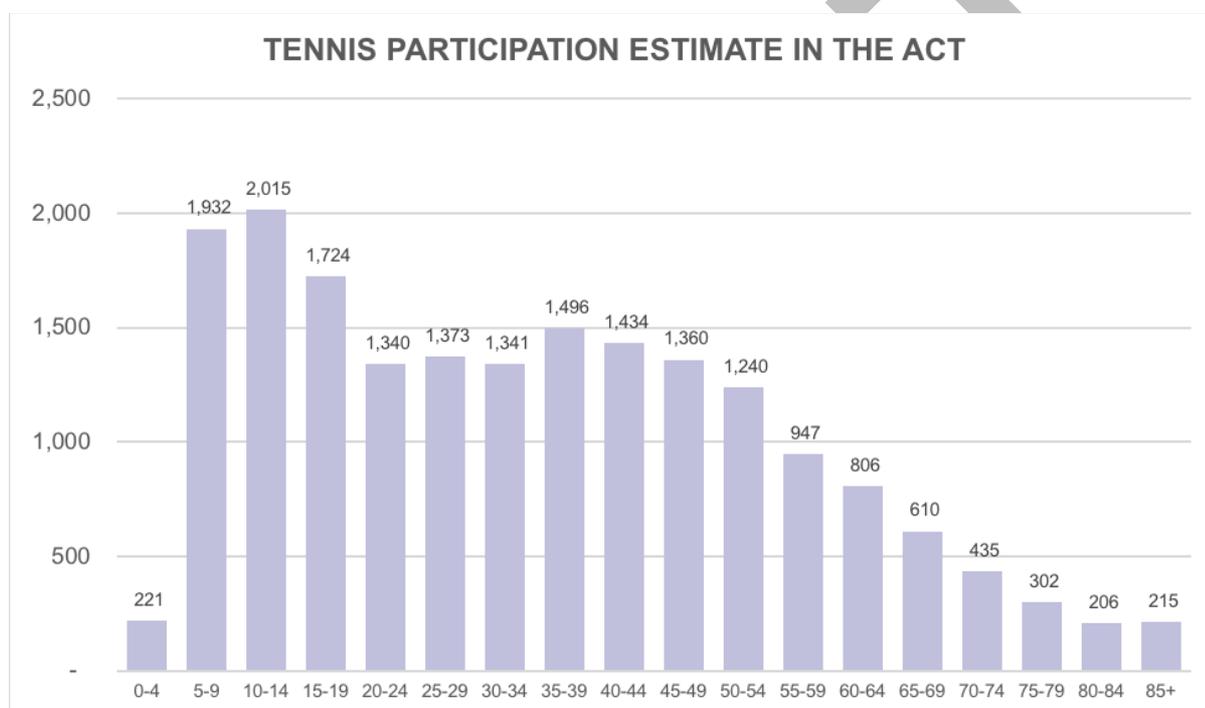


Figure 4 – Tennis participation estimate in the ACT

To assess tennis participation by region, the most recent AusPlay survey data was applied to the Territory membership percentages for each age group to calculate what percentage of estimated participants were members. This equation was then applied to the membership figures for each region and age group to estimate the participation rates for these categories. This was used to provide insights into participation rates for each age group in each region and how they may change over time as the demographics of the region change.

It is acknowledged that this method of calculating participation may have a significant margin of error, but without more granular participation data available from the AusPlay survey, the My Tennis data is the best method of examining the different rates of participation in tennis for each region within the ACT. To illustrate this, the following graph identifies the percentage of the population for each region that is a member of a Tennis ACT affiliated venue.

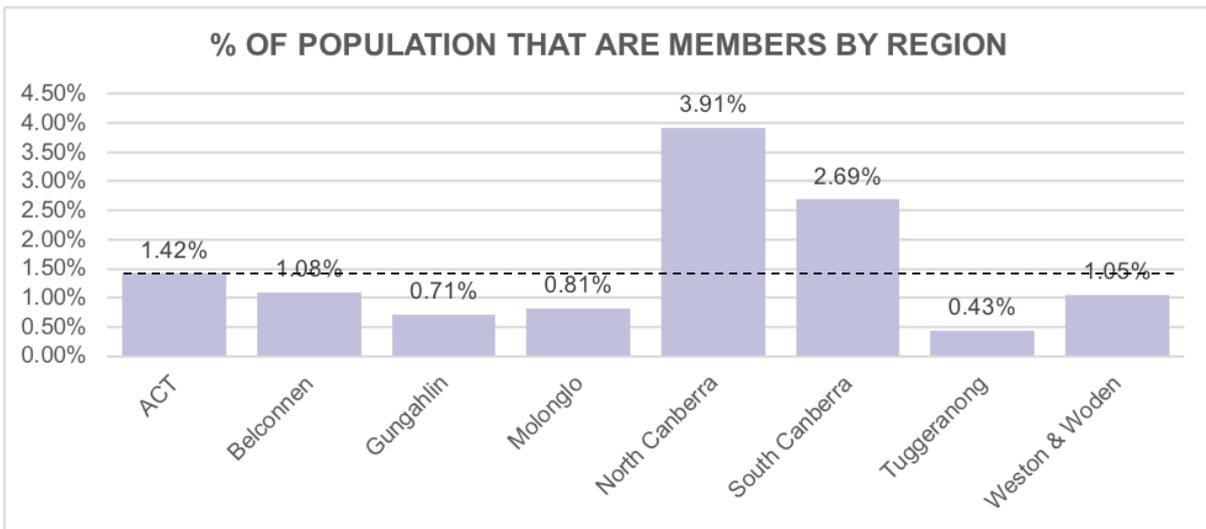


Figure 5 - Percentage of population that are Tennis ACT members by region

This suggests participation rates in North Canberra and South Canberra, which are above the Territory benchmark of 1.42% of the population that are members would be higher than the AusPlay participation rate Territory average of 6% for children and 3.9% for adults.

In the regional summaries in section 3.4, two methods have been used to assess participation:

1. AusPlay national participation rate by age group applied against the regional population by age group; and
2. Percentage of participants according to AusPlay that are My Tennis members by age group, benchmarked by ACT figures, then applied to regional population age groups (as outlined above).

Program registration data provides good insight, however when all programs are combined it does include some duplication as some individuals may have signed up for multiple programs. For example, an ANZ Tennis Hot Shots participant may also be a member of a club, so would be included in both programs. The following graph provides a breakdown of My Tennis, Book a Court, Cardio Tennis and ANZ Tennis Hot Shots registered participants by age and gender.

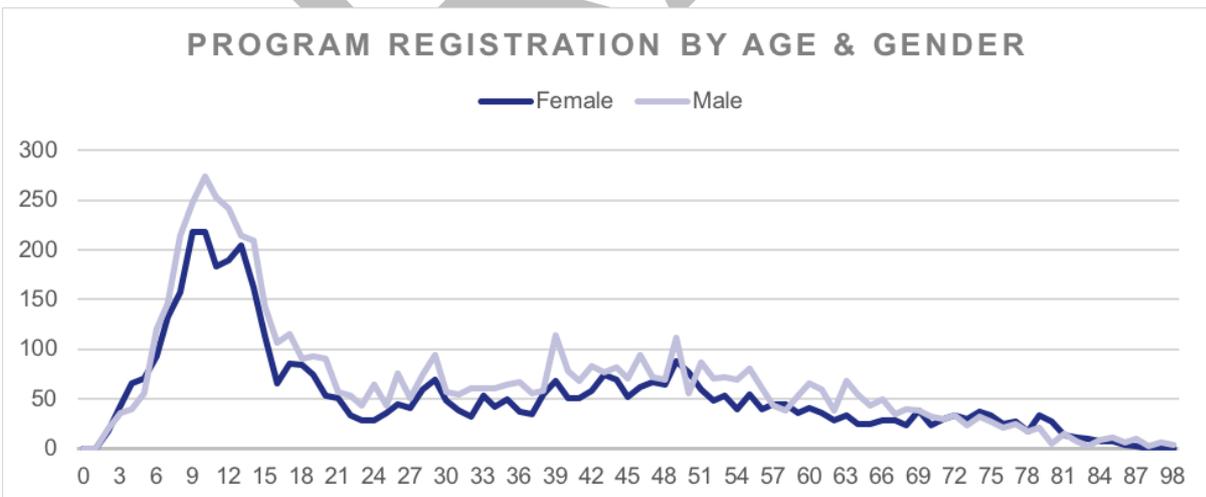


Figure 6 - ANZ Tennis Hot Shots, Book a Court, Cardio Tennis & My Tennis registration by age & gender in the ACT

3.3.1 Tennis programs

Tennis programs form a fundamental component of effective venue utilisation and act as a measure of tennis participation. Program delivery within the ACT includes the following programs:

Programme	Summary	Target Demographic
	A learn to play introductory programme delivered by qualified coaches or club volunteers. Uses modified equipment to make the sport age and skill appropriate. Includes coaching, match play and community play programmes.	Ages 3 – 12
Australian Ranking (AR) Tournaments	AR Tournaments provide competitive playing opportunities for aspiring professionals or players seeking to achieve a national ranking. They are broken up into Junior Tour (JT) events and Australian Money Tournaments (AMTs).	JT ages 12 – 16 AMT ages 16 – 50
Book A Court  	This is an online court booking programme that provides a method for community tennis venues to provide a method of pay-for-play. This allows the public to book and pay for courts online making it easier to participate through casual hire.	Ages 20 – 45
Open Court Sessions 	Open Court Sessions is a program specifically designed for the 25 – 45 demographic and based off significant research (Evello – Participation Review). It is a social offering in a very friendly and fun environment with music, food and drinks. No skill is necessary as modified balls and equipment is used. An excellent option for clubs / coaches to attract people back to the sport. Part of the Play Tennis campaign and a key element of the adult offerings.	Ages 25 – 45 Young Adults / Parents Young Professionals Social
Cardio Tennis  	A coach delivered group fitness based program targeting adults of all abilities. Utilises music and heart rate monitors to provide a high-energy workout.	Ages 16 – 44 Young Professionals Young Families (greater participation from females)
Coaching	Professional accredited coaches delivering coaching sessions in a private, semi-private and group basis. Focus is on term based junior coaching programs, but also includes programs targeting all ages and demographics.	Ages 5 – 16
FAST4 Tennis	Short format competition specifically designed for time poor participants. No advantage games and sets are played to 4, no lets and short tiebreaks.	Ages 20 – 44

Programme	Summary	Target Demographic
In-house leagues	Delivered in a variety of formats, but generally a term based or 6-8-week commitment. Played at a single venue at the same time each week. Usually, volunteer or coach organised and supervised.	Ages 20 – 44
Local tournaments	Tournaments designed for localised competition, such as club championships, resident championships or specific closed groups. Normally based at a single venue and organised by a professional coach, but sometimes volunteer run. Includes Junior Development Series.	Ages 15 – 54
National Academy	High performance program delivered by Tennis Australia National Academy Coach. Delivered at high performances venues with ITF approved surfaces and other facilities required for elite training.	Ages 12 – 16
Canberra Tennis League (junior and adult) 	Inter-club team competition run seasonally by Tennis ACT for affiliated venues. Junior pennant is normally coordinated by the club coach and adult pennant by a volunteer pennant coordinator.	Junior ages 10 – 15 Adult ages 16 – 54
Seniors (35+)	Social, team competition and individual tournament participation opportunities limited to players 35 years and over. Majority of organised activities target elite players, but a few entry level weekend social tennis sessions are offered. Competitions and events are organised by Tennis Seniors ACT.	Ages 35+
Social tennis	Volunteer or coach organised social tennis. Low commitment, organised on a session by session basis at a single venue. Three distinct offerings: <ol style="list-style-type: none">1. Day midweek – retirees2. Evening midweek – professionals3. Weekend – families	Day ages 55+ Evening 20 – 54 Weekend 15 – 55+
Talent development	Group squad sessions delivered by professional coaches to develop talented junior players aged 5 – 12. Designed as a feeder program for the National Academy program.	Ages 5 – 12
Tennis in Schools	Delivered at school by coaches from neighbouring venues. Coordinated by Tennis ACT to introduce children to the sport and feed school children into club coaching programs.	Ages 5 – 16

Table 2 - Tennis ACT Programs

Tennis programs are designed to meet the needs of different market segments. These segments include people learning to play, playing socially and playing competitively, as well as being in the different life stages of Childhood, Adolescence, Young Adulthood, Adulthood and Late Adulthood.

The following figure shows the pathway for tennis participation by life stage, layered in three categories Learn to Play, Play Competitively and Play Socially. This helps to illustrate the target markets for specific programs and how they contribute to tennis participation. Ideally, tennis facilities should ensure they provide a variety of programs to service the full participation pathway, with a particular focus on the demographics within their local region.

Tennis Participation Pathway by Lifestage

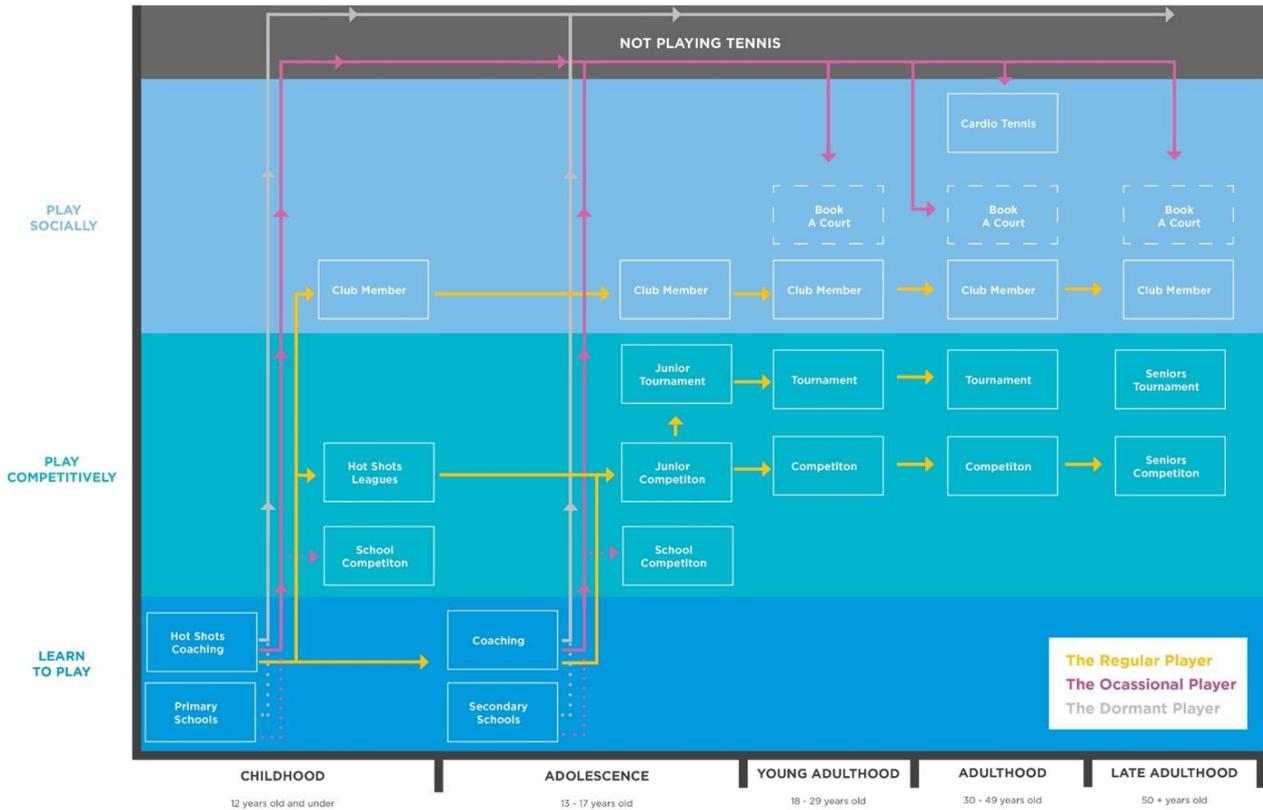


Figure 7 - Tennis Australia tennis participation pathway by life stage* *Open Court Sessions exists in similar positions to Cardio Tennis across Adulthood and in 'Play Socially'

Currently, not all tennis facilities in the ACT provide a full range of programs. The table below identifies the number of Tennis ACT venues in each region that are delivering specific programs.

Tennis ACT venues delivering programs by ACT Region	Belconnen	Gungahlin	Molonglo	North Canberra	South Canberra	Tuggeranong	Weston Creek / Woden Valley	Total ACT
Total Venues	4			9	6	4*	4	27
ANZ Tennis Hot Shots (ANTHS)	4			5	5	2	3	19
Australian Ranking (AR) Tournaments				1				1
Book a Court	3			6	5	2	3	19
Cardio Tennis	4			6	5	1	3	19
Coaching	4			4^	6	2		16
FAST4							1	1
In-house leagues				1	1		1	3
Local tournaments	1			1	1	1	2	6
National Academy				1				1
Pennant (junior and adult)	4			8	6	2	4	24
Seniors (35+)				1			1	2
Social tennis	4			8	6	2	4	24
Talent development				1			1	2
Tennis in Primary Schools (at school not venue)	16	8	1	9	14	10	7	65
Tennis in Secondary Schools (at school not venue)	2	3		3	3	3	2	16
Total Programs	41	11	0	50	40	21	33	

Table 3 - Program delivery at Tennis ACT venues (except Tennis in Schools)

* Includes Mpowerdome (closed)

^ Doesn't include ANU, Campbell, Tennis World & Turner Tennis Clubs, as they are not listed on the 'Find a Coach' portal – not registered coaches.

3.3.1.1 ANZ Tennis Hot Shots

There were 2,322 registered participants in the ANZ Tennis Hot Shots program in the ACT in 2016-17, 43.5% (1,010) were female and 56.5% (1,312) were male. The figure was direct registration of players online (involved in the program) by parents which requested specific DOB and location details (postcode). The highest participation by age for both female and male children is 10 years old. Note after 2016/17 the recording method was changed to survey all ANZ Tennis Hot Shots Deliverers (as not all parents were completing the online registration) with the following figures: 4,794 participants in 2017-18 and 4,678 participants in 2018-19. This survey gave a better reflection of numbers but did not include DOB or location (postcode) data. Thus data presented below represents the 2016-17 figures. The survey was not completed for 2019-20 due to COVID-19 and timing in approaching coaches (it was felt it was not appropriate).

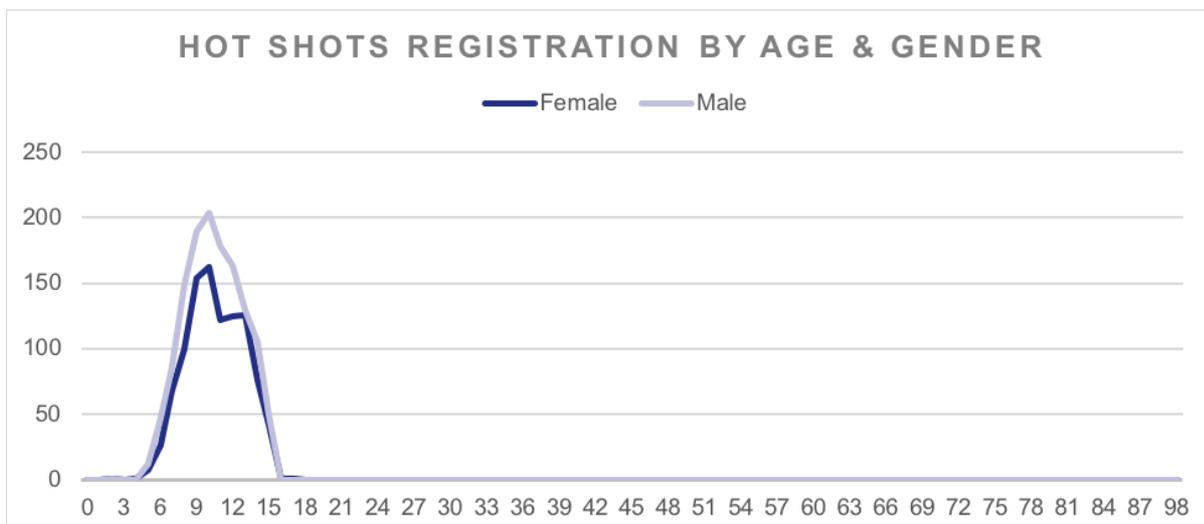


Figure 8 - ANZ Tennis Hot Shots registration by age and gender

Highest program registration by region is in Belconnen (617), but the highest percentage of population registered are from Weston Creek and Woden Valley (4.3%). The success of this program with residents of Weston Creek and Woden Valley is particularly successful in the 5-9 year old age group, 10.4% of the population registered. Of most concern is the poor performance of Tuggeranong in the 5-9 year old age group, with only 2.5% of the population registered.

Age Group	Belconnen		Gungahlin		Molonglo		North Canberra		South Canberra		Tuggeranong		Weston & Woden	
	#	%	#	%	#	%	#	%	#	%	#	%	#	%
0-4	37	0.5%	11	0.2%	0	0.0%	6	0.2%	2	0.2%	8	0.1%	25	0.7%
5-9	376	6.2%	289	5.0%	9	3.3%	92	4.2%	47	3.4%	139	2.5%	380	10.4%
10-14	204	4.0%	177	3.8%	3	1.3%	63	3.0%	26	1.7%	94	1.8%	196	5.7%
Total	617	2.6%	477	2.2%	12	1.0%	161	1.6%	75	1.3%	241	1.1%	601	4.3%

Table 4 - ANZ Tennis Hot Shots registration by age group and region (number & percentage of population)

The program is under performing with residents in North Canberra, South Canberra and Tuggeranong, with Molonglo's sample too small to be considered. This could largely be attributed to the smaller percentage of venues delivering the program in these regions.

Considering Gungahlin doesn't have an affiliated facility in the region, the region is performing well. This could be attributed to the focus of Tennis in Schools programming, the construction of dedicated Hot Shots courts at schools in the region and perhaps players already registered from other regions moving into Gungahlin as it grows.

3.3.1.2 Book a Court

The Book a Court program is still relatively new (piloted from Oct 2015) and has been implemented at 19 venues, so the registration data will improve as the program is more widely implemented and the data capture continues to improve. In consideration of this factor, the data captured was beyond the 2018-19 financial year and includes registrations up to the end of September 2019. A significant increase has been seen “post COVID” and this data is to be included and updated in due course.

There are 5,751 registered with Book a Court at the end of September 2019, 36% (2,091) female, 63% (3,585) male and 1% (75) of unknown gender.

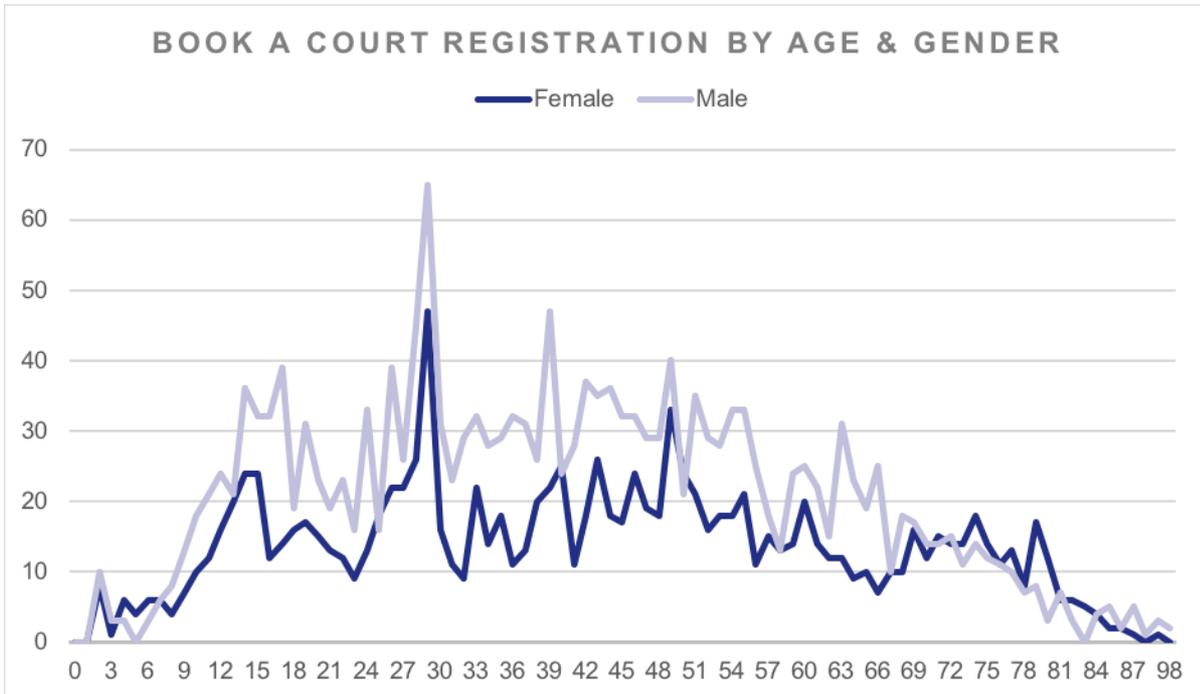


Figure 9 - Book a Court registration by age and gender (to update)

The highest number of registrations is from 29 year old males (136) and females (101). The system is still in its infancy which presents some gaps in certain fields of data. For example, 28.43% of registrations in 2017/18 didn't have date of birth information. There is also a significant level of **under** reporting. This is due to the system only capturing the individual booking of the court and does not consider the partner or partners that are playing with the person booking. Participation in the program could be up to 3 times larger (if playing doubles) than current registration suggests. At a very minimum it should be assumed these figures should be doubled as no one is booking a court to play by themselves. However, for data integrity purposes only the actual individual booking has been factored in.

It is still too early in the programs implementation to achieve great insight into the regional demographic breakdown in participation, but currently South Canberra, where the program has been implemented for some time has the highest percentage of the population registered, 5.41%. Unsurprisingly, the lowest is in Gungahlin (0.49%) and Tuggeranong (0.41%).

At a Territory level, the centralised Book a Court marketing campaign conducted in December 2017 – April 2018 produced very encouraging results. This was the largest ever tennis above the line campaign conducted in the ACT. Revenue for community tennis clubs from casual court hire grew by 245% over this period compared with the same period the previous year, with the digital campaign producing 1,464 court bookings. Further significant growth has been seen in more recent years with a 34% growth in revenue and 29% growth in bookings for 2018-19 compared with previous 12 months. The ability for Volunteer Committee Clubs to be able to generate revenue from pay for play is a very important shift in their management model and could be key to putting them on the path to sustainability.

Recommendation 3:

There should be a concerted effort between Tennis Australia, Tennis ACT and the affiliated tennis venues to improve Book a Court system data to include accurate gender, date of birth, postcode and primary place of play. The program should continue to be implemented at all affiliated venues, including public courts and schools. It's ability to open up the courts to the community through an easy online booking process, capture revenue for the club or venue operator and capture participation data will be valuable to the future of the sport and should continue to be a high priority.

3.3.1.3 Cardio Tennis

There were only 62 registrations for Cardio Tennis in the 2016-17 financial year. This figure was based on participants registering themselves directly online and a lot failed to do this. This data did contain DOB and location (postcode) and has been used in summary tables despite its small size. Note after 2016/17 the recording method was changed to survey all Cardio Tennis Deliverers (as not all players were completing the online registration) with the following figures: 433 participants in 2017-18 and 481 participants in 2018-19. This survey gave a better reflection of numbers but did not include DOB or location (postcode) data. Thus data presented below represents the 2016-17 figures and has been used in the following tables ('Regional Summary'). The survey was not completed for 2019-20 due to COVID-19 and timing in approaching coaches (it was felt it was not appropriate). After its initial launch this program (Cardio Tennis) was not a focus for Tennis Australia or Tennis ACT and hence traction subsided. It will be getting further attention over future years and an injection of marketing / promotion.

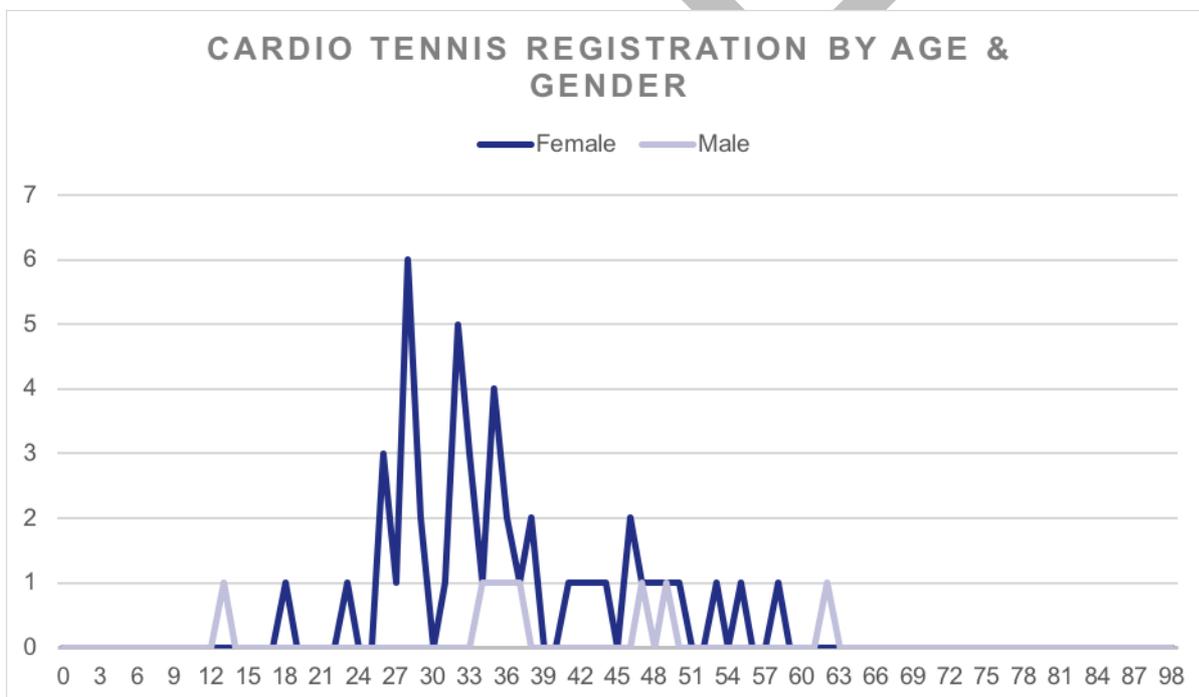


Figure 10 - Cardio Tennis registration by age and gender

The program is more popular with females (82%) in the 25-29 age group. Variations of this program are widely delivered by coaches and not captured in these registrations. It may be the nature of the parameters of the program registration for coaches and participants that have limited its success, as it has been extremely successful in the US market.

Recommendation 4:

A review of the barriers for delivery and participation of Cardio Tennis should be conducted to understand whether they are preventing greater implementation of the program. It appeals to an important market segment, so efforts for greater participation should be explored prior to abandoning the program.

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3.3.1.4 Club Membership (My Tennis)

There were 5,955 members of affiliated tennis venues in the ACT in 2016-17, 46% (2,752) are female and 56% (3,203) are male. A large percentage, 42% (2,523) of these are members of the Canberra Tennis Centre. There were 6,284 members of affiliated tennis venues in the ACT in 2018-19 and only incremental growth as the significant growth is seen in casual court hire via Book A Court. There has been a recent spike in club memberships “post COVID” and this data is to be updated and reflected.

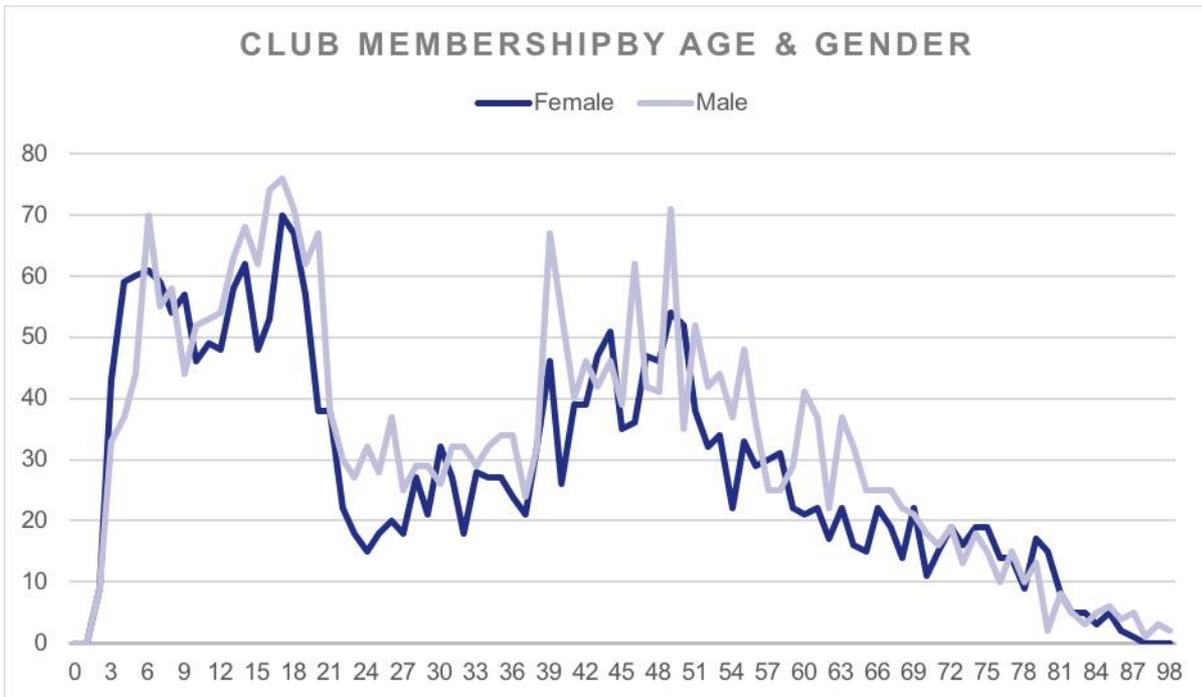


Figure 11 - Club membership by age and gender

North Canberra is the best performing region with 3.43% (1,864) of the population a member of an affiliated facility. However, it also has an extraordinary high percentage of the 0-4 age group, with 12.34% of members in this region in this age group. The 0-4 age group also has 9.27% (230) of the population in the region as members. This statistical anomaly is due to the very large number of members of the Canberra Tennis Centre in the 0-4 age group, with 98% of this age group members of this facility.

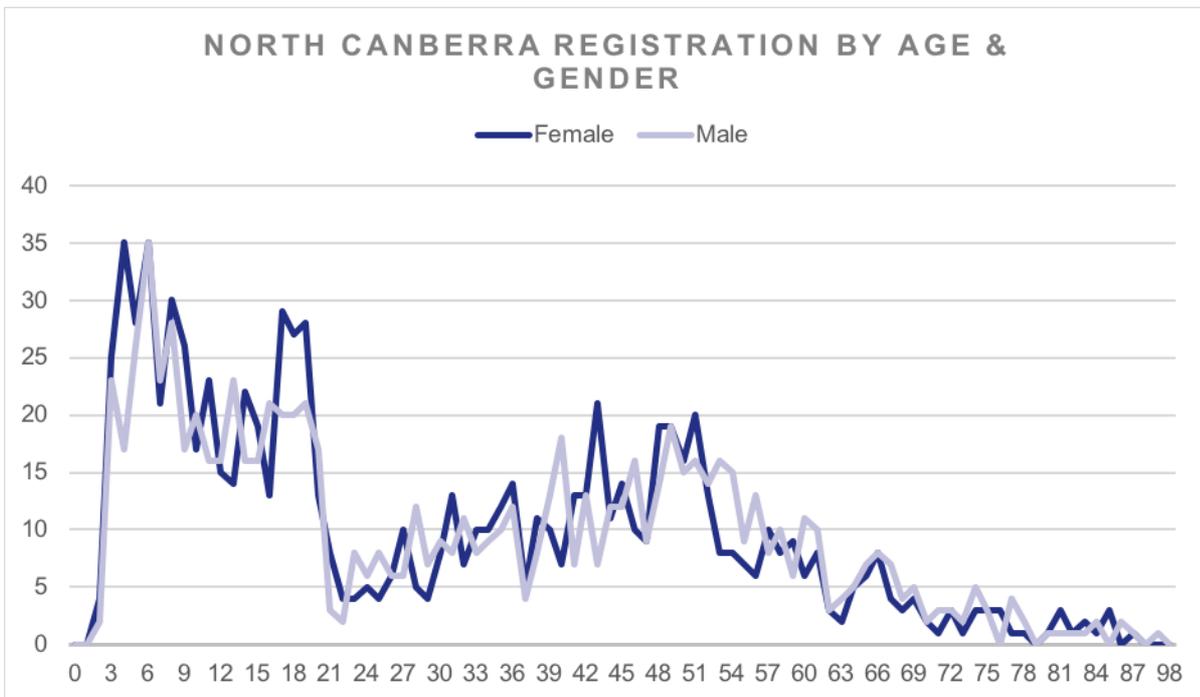


Figure 12 - North Canberra membership by age and gender

When we remove the Canberra Tennis Centre data from the region, we get a very different picture of the demographics of the membership.

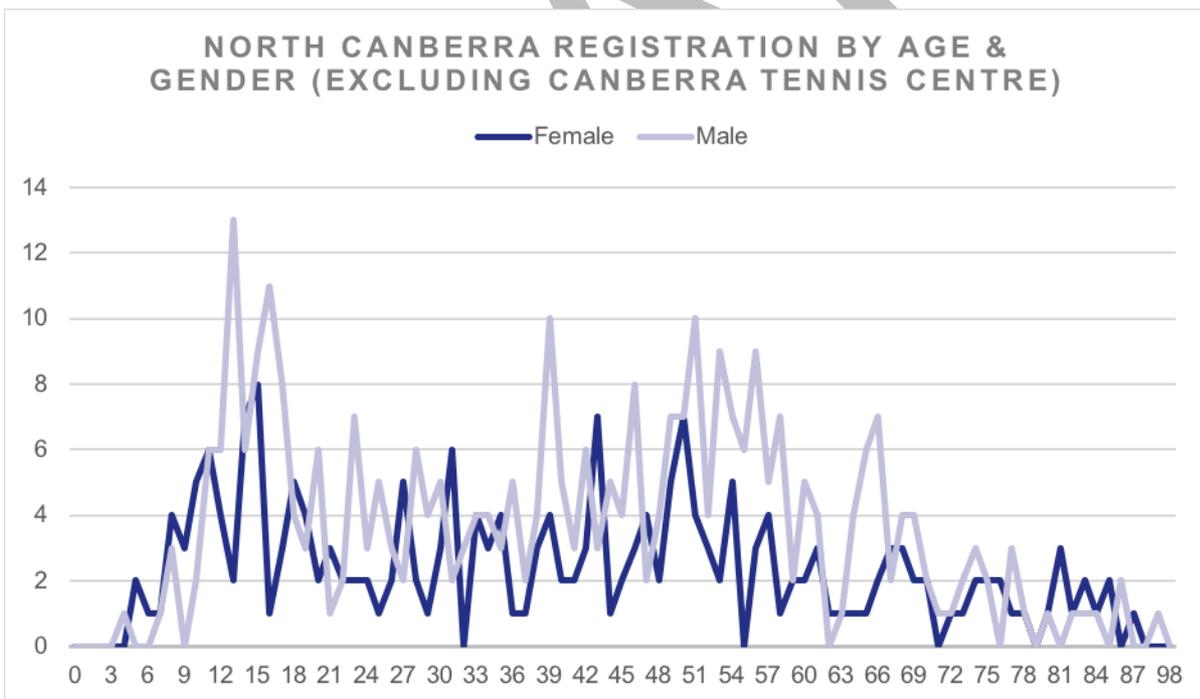


Figure 13 - North Canberra membership by age and gender (excluding the Canberra Tennis Centre)

This change in demographic highlights the different appeal of facilities of different hierarchy and management model that offer a different value proposition for membership and programming. The Canberra Tennis Centre, which is a National Tennis Centre operating under a Private / Public Partnership model with Next Gen Canberra has a much higher proportion of younger members, particularly females. The other facilities in the region are Local Tennis Centres operating under a Volunteer Community Club model.

Tuggeranong and Molonglo are the worst performing regions, with only 0.48% of the population in these regions members of an affiliated venue. Next is Gungahlin, with 0.76%, however 71% of these members are members of the Canberra Tennis Centre.

Recommendation 5:

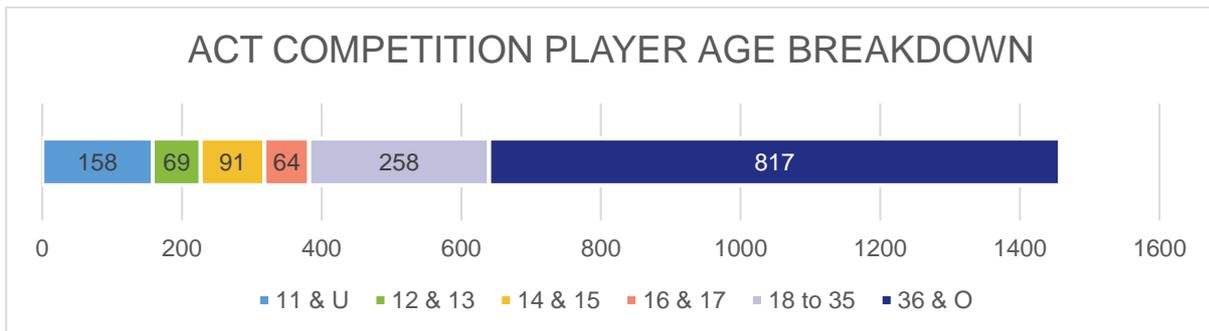
Clubs need to consider their membership value proposition and associated programs in relation to the demographics in their immediate region, the participation by life stage and modern consumer's needs. Currently, the overwhelming majority of clubs provide an annual lump sum membership, requiring annual renewal. This causes a barrier to renewal, is now antiquated and not best practise in the health and leisure industry. Clubs should consider membership models that operate on a fortnightly direct debit with auto renewal. Tennis ACT should ensure that the My Tennis system supports this model and assist clubs in making the transition. Ease of administration is vital for Volunteer Community Clubs and it may be that they need to move to a professional management model to implement these type of changes in membership model. A professional management model also allows a greater diversity of programming and could improve the standards of facilities and asset management.

Canberra Tennis Centre needs to engage and convert the high percentage of members in the Childhood life stage into the ANZ Tennis Hot Shots program.

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3.3.1.5 Competition (Canberra Tennis League)

The gender balance of competition in the ACT is consistent with the national breakdown, 69% (1,129) of competition players are male and 31% (499) female. The age breakdown compared to national statistics has a higher percentage of older players. In the ACT 56% are 36 and older compared to 47% nationally.



In the 2016/17 financial year 1,631 unique individuals competed in competitions in the ACT, compared with 1,776 in the previous year. There were 1,566 unique individuals in 2018-19 and then a significant drop in 2019-20 due to cancelled seasons due to smoke haze (summer season) and COVID-19 (autumn season). In addition to a reduced number of participants, the churn rate increased from 35% to 50% and there was a reduction in the average number of matches played from 11.19 to 9.99.

This highlights concerns for the future of the traditional method of tennis competition in the ACT. To combat this Tennis ACT has introduced a number initiatives to enhance the playing experience of this format and launched the new Canberra Tennis League. As the preferences of modern consumers change, this format of competition will need to continue to adapt to remain suitable and relevant to player's needs. Pleasingly there has been a huge response and return to tennis competition "post COVID" with Winter 2020 adult teams jumping some 47% in team numbers and Spring 2020 seeing a 12% increase in adult teams.

In addition, centre based competition has been introduced including Tennis ACT's Ready, Set, Tennis program, which was later replaced with Fast4. These in-house competitions are an important supplement to the traditional Canberra Tennis League competition. Canberra Tennis League continues to provide a stronger level of competition in its home and away format and remains an important part of the participation and development pathways.

Recommendation 6:

Tennis ACT should continue to monitor participation rates, churn and player satisfaction for Canberra Tennis League competition and where appropriate react and adapt to feedback from the playing community. A variety of competition formats and in-house competitions should be considered to supplement the current Canberra Tennis League offering.

3.3.1.6 Tennis in Schools

Tennis ACT, with increased support from Tennis Australia has recently been making significant inroads with their Tennis in Schools program. 17,552 primary students and 4,563 secondary students were enrolled in schools in the ACT that are part of the National School Partnership Program (NSPP) in 2017-18. In June 2018, the number of registered students in the NSPP in the ACT surpassed 10,000. This figure has grown considerably to 19,805 children across primary and secondary directly involved in Tennis programs for 2018-19. A further increase was seen in 2019-20 with a total of 23,441 participants across primary and secondary schools.

In the absence of a tennis facility in Gungahlin, there has been a focus on delivering the NSPP to fill the void of participation opportunities for school aged children in that region. As a result, 73% of Primary schools (8/11) and 75% of secondary schools (3/4) in Gungahlin are enrolled in the NSPP (2018-19 and 2019-20).

This concentrated effort in schools in Gungahlin has potentially led to higher participation in ANZ Tennis Hot Shots, with 2.2% of the target population registered, compared with 1.6% in North Canberra. However (2016-17), 477 enrolled students from the 9,007 students in schools in the region, presents a very low conversion rate. Without a tennis facility in

the region it is very difficult to make links from the Tennis in Schools program to enrolment in a club program and progress the participant into a participation pathway within a club coaching program or other activities.

Recommendation 7:

The Tennis in Schools program needs to continue its current strategy of targeting regions with lower participation opportunities and look to improve its conversion rate by facilitating strong partnerships with local coaches delivering programs in nearby clubs.

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3.4 Tennis Infrastructure

Tennis in Australia has over 15,000 accessible tennis courts, which historically have been constructed, managed and operated within a volunteer and committee-based environment. With most courts residing on government land, there is a general trend of increased and significant investment required by various government sectors to maintain and upgrade courts for local communities. This is reinforced through our consumer research.

Rising costs of surface replacement and consumer expectation of quality tennis program services, courts, clubhouse and surrounds makes small clusters of courts increasingly difficult to manage as self-sufficient and sustainable venues.

Sustainable practice, in tennis terms, is defined as a tennis entity having the resources to consistently maintain and upgrade the asset without reliance on external support.

Many existing tennis clubs, centres and associations operate in an environment of declining facility standard and service provision. These facilities require effort towards change if tennis is to remain viable to government and local communities.

It is now more common for all levels of government to strategically plan for any community infrastructure. Increasingly, governments are adopting a hierarchy of facilities provision to balance regional and community needs with sustainable practices. Tennis Australia believes that a similar planned approach should be taken with tennis infrastructure across Australia. It is critical to the health of tennis that a hierarchy of facilities is developed to meet the stated vision and objectives and to develop the sport as a whole.

The following table identifies the Tennis Australia Facility Hierarchy and the objectives of each level of the hierarchy.

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Tennis Australia Facility Hierarchy	Objectives
National Tennis Centres (20+ courts)	<ul style="list-style-type: none"> • Inter/national tournaments and events • High performance training environment • Sustainable tennis development objectives • Sustainable economic development objectives • Showcase for tennis
Regional Tennis Centres (16+ courts)	<ul style="list-style-type: none"> • National/state based tournaments • High performance training and talent feeder focus • Resource for smaller centres, clubs and associations • Economic driver • Grass roots development • Sustainable tennis development objectives • Community health and wellbeing objectives
Large Community Tennis Centres (12+ courts)	<ul style="list-style-type: none"> • Intra/inter club tournaments/competitions • High performance training feeder and focus • Resource for smaller centres, clubs and associations • Grass roots development • Sustainable tennis development objectives • Community health and wellbeing objectives
District Tennis Centres (8+ courts)	<ul style="list-style-type: none"> • Inter club tournaments/competitions • High performance training feeder • Grass roots development • Sustainable tennis development objectives • Sustainable community health and development objectives
Local Tennis Centres (4+ courts)	<ul style="list-style-type: none"> • Inter club tournaments/competitions • High performance training feeder • Grass roots development • Sustainable tennis development objectives • Sustainable community health and development objectives
Public Access Courts (1+ court)	<ul style="list-style-type: none"> • Tennis engagement opportunities • Health and social objectives • Public accessible venues • Community development objectives

Table 5 - Tennis Australia Facility Hierarchy

Tennis in the ACT is currently serviced with 27 venues distributed inconsistently across the Territory and three venues immediately across the border in NSW providing 157 courts and a range of tennis participation experiences. The following tables provide an inventory of existing tennis venues, facilities provided and management models.

Tennis Australia Facility Hierarchy by ACT Region	Belconnen	Gungahlin	Molonglo	North Canberra	South Canberra	Tuggeranong	Weston Creek / Woden Valley	Total ACT
National Tennis Centres (20+ courts)				1				1
Regional Tennis Centres (16+ courts)								0
Large Community Tennis Centres (12+ courts)							1	1
District Tennis Centres (8+ courts)	2					1 [^]	1	4
Local Tennis Centres (4+ courts)	2			6	6	3	1	19
Public Access Courts (1+ court)		2 [*]		2			1	5
Total Courts	24	4[*]	0	57	27	23	26	161

Table 6 - Tennis Australia facility hierarchy by ACT region

[^]includes Mpowerdome (closed)

^{*}4 courts in Gungahlin comprised of two at Gungahlin College and two at Gold Creek Country club. Neither of these goes close to representing a tennis facility or venue with no amenities and metal wire nets (Gungahlin College). Nor are they affiliated bodies offering programming and services.

Recommendation 8:

A better spread of Tennis Australia Facility Hierarchy is highly desirable. Any new facilities should be of at least District Tennis Centre (8+ courts) size and ideally Large Community Centre (12+ courts) size, due to the greater efficiencies of a 12-court facility (as identified by the Operational Health Check benchmarks).

Tennis ACT Community Tennis Club Amenities by ACT Region	Belconnen	Gungahlin	Molonglo	North Canberra	South Canberra	Tuggeranong	Weston Creek / Woden Valley	Total ACT
Total Venues	4			9	6	4*	4	27
Bar				1	1			2
BBQ Facilities	4			6	5	3*	2	20*
Canteen/Kiosk/Cafe				1	1	1*	1	4*
Car Park	4			6	6	3*	4	23*
Change Rooms	4			5	6	2*	2	19*
Club House	4			7	6	3	3	23
Club/Community Meeting Room/s	3			1	1	1	1	7
Crèche Facility				1	1	1*		3*
Function Room				1		1*	1	3*
Gym				1				1
Hitting Wall	2			5	3	3	2	15
Kitchen	4			6	6	2	2	20
Pro Shop				1	1		1	3
Showers	4			2	2	3*	2	13*
Toilets	4			6	6	3*	3	22*
Wheelchair Access	2			1	2	2*	2	9*

Table 7 - Tennis ACT community tennis club amenities by ACT region

* Includes Mpowerdome (closed)

Recommendation 9:

Venues should plan to improve their amenities to cater to modern consumer needs. There is a lack of Canteen/Kiosk/Café and Pro Shop facilities severely limiting revenue opportunities and basic amenity. Venues should consider transitioning their management model to be able to provide these services.

Tennis Australia Management Model by ACT Region	Belconnen	Gungahlin	Molonglo	North Canberra	South Canberra	Tuggeranong	Weston Creek / Woden Valley	Total ACT
Private / Public Partnership				1*				1*
Community Activity Hub								0
Tennis World				1*				1*
Private / Professional Operator					1	2 ⁴		3
Volunteer Committee – Management Overlay				1			1	2
Volunteer Community Club	4			7	5	2	3	21

Table 8 - Tennis Australia management model by ACT region

* Canberra Tennis Centre has been defined as both the PPP & Tennis World model

Recommendation 10:

Venues should explore professional management models to make them less reliant on volunteers, which in turn allows volunteer time to be focused on other key areas. The Facilities & Planning Manager should survey the venues with the Tennis Australia Services Sheet to gain more granular

⁴ Includes MPowerdome, which was closed at the time of writing this report

3.4.1 Impact of location of facility on club membership

The geographic location of tennis infrastructure has a direct correlation to club membership. The largest percentage of members, 47% live within the same post code as the facility, while 61% (47% + 14%) live within the same region.

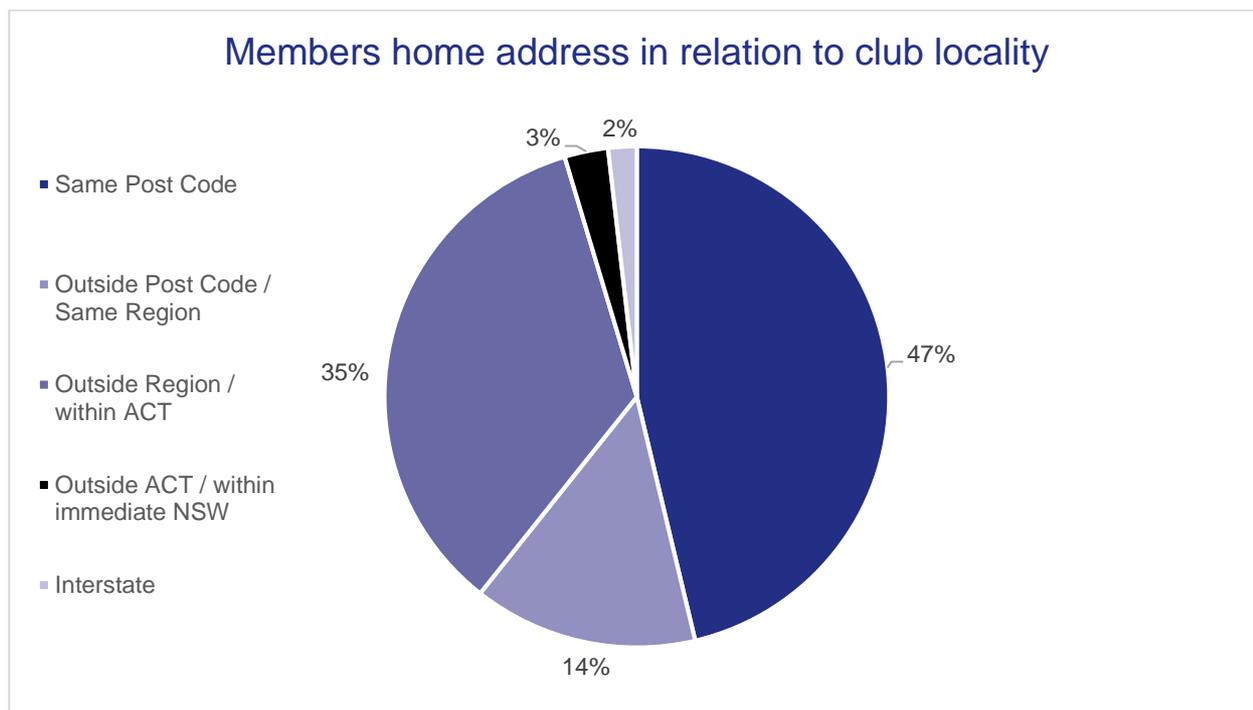


Figure 14 - Tennis ACT members home address in relation to club locality

This indicates that the location of a facilities proximity to population does impact its membership, with 61% of its members likely to be from the same region. Anecdotally, the facilities proximity to the workplace is also a consideration, with facilities close to the working population experiencing a wider spread of members, for example Old Parliament House, which is situated in the Parliamentary Triangle has 77% of its members from outside of the region.

The management model and facility hierarchy also impact the catchment area for members. A Local Tennis Centre with a Volunteer Committee Club model has a much smaller catchment compared to a National Tennis Centre with a Private / Public Partnership. For example, Majura Tennis Club has 90% of its members from the same post code, while the Canberra Tennis Centre has 50% from the same region.

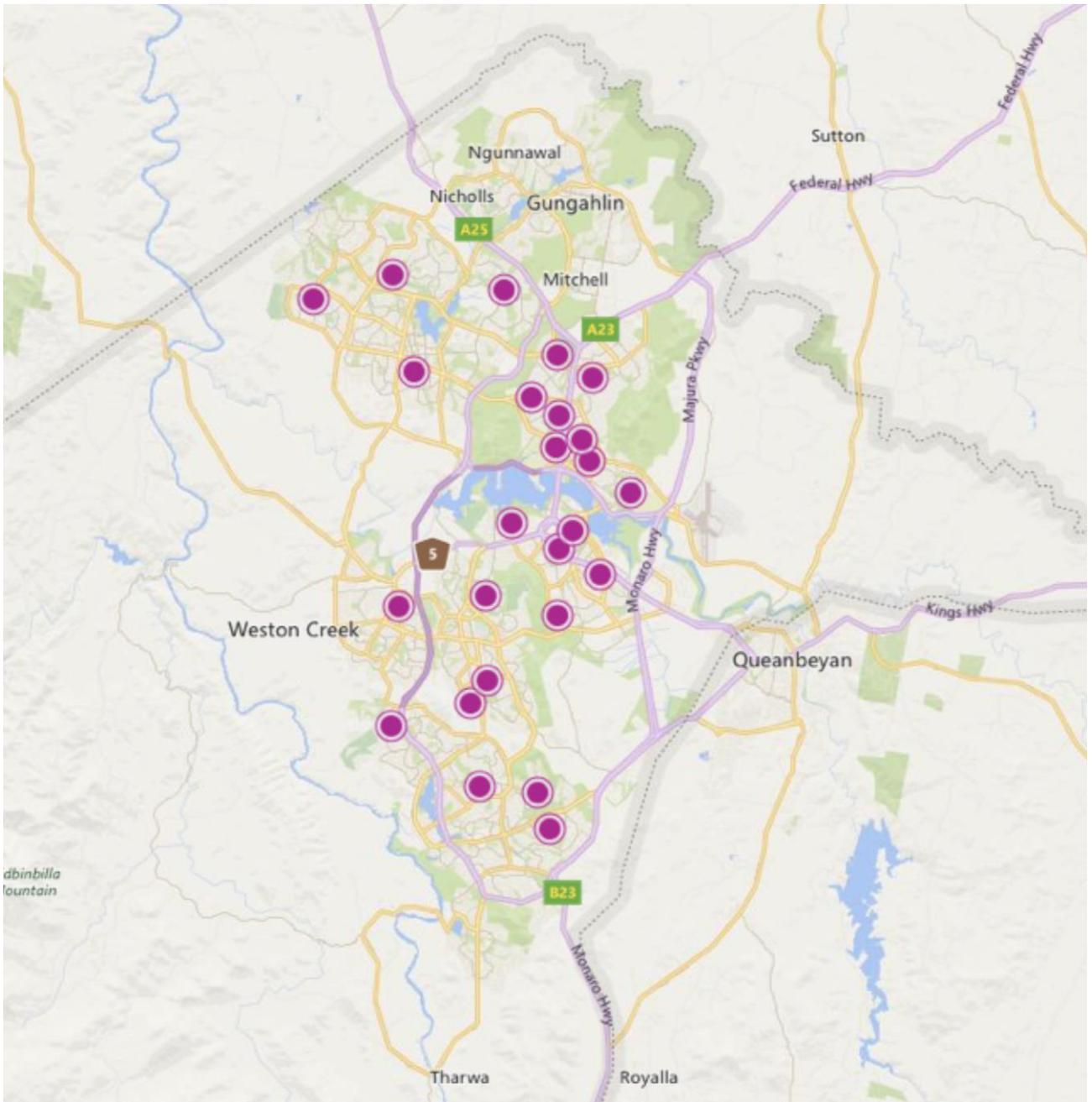


Figure 15 - Location of Tennis ACT affiliated venues



Figure 16 - Location of Tennis ACT members in the ACT and surrounding region

Recommendation 11:

There is currently a very poor geographic spread of affiliated tennis facilities in the ACT. With no facilities in Gungahlin and Molonglo. Tennis ACT and ACT Government should make it the highest priority to ensure there is appropriate access for local communities to tennis facilities. Construction of a tennis facility in Gungahlin should be the highest priority, but also ensuring an appropriate geographic spread of tennis courts that are consistent with the Tennis Australia guidelines for court to population ratio of 1:2,000. That is one court per 2,000 people.

3.4.2 Belconnen Regional Summary

Facility and court number summary table

Belconnen	Population = 96,049 (2016)
	Population = 97,244 (projected for data comparison)
Estimated Population 2020	100,040
Tennis ACT Members 2017	1,058 (1.09 % of population)
ANZ Tennis Hot Shots	617 (2.6% of population)
Cardio Tennis	34 (0.03% of population)
Book a Court	1,515 (1.56% of population)
Tennis in Schools	3,018
Estimated participants 2016 AusPlay (Member %)	4,586 (3,324, 3.42%)
Estimated participants 2026 AusPlay	5,041 (growth 456, 10%)
Regional Tennis Centre 16+ courts	N/A
Large Community Tennis Centre 12+ courts	N/A
District Tennis Centre 8+ courts	Melba – 8 courts + 4 ANZ Tennis Hot Shots courts Belconnen – 8 courts
Local Tennis Centre 4+ courts	Kaleen – 4 courts Kippax – 4 courts
Public Access Centre 1+ courts	N/A
Total number of courts	24
Estimated court to population ratio (2020)	1:4,168
Court to population ratio (2016)	1:4,002
Court to population ration (2011)	1:3,945
Court to population ratio (2008)	1:2,447
Members per court	44
Participants per court	191

Insights

- Current court to population ratio of 1:4,002 indicates a shortage of courts for the current population. This is partly due to the closure of the Hawker Tennis Club (12 courts). Low membership to population ratio and high number of members per court confirms this.
- Court closures significantly reduce the current court to population ratio from 2008, 2011 to 2016 in the Belconnen area.
- Good mix of facilities within the TA hierarchy of facilities.
- The future development of West Belconnen needs to be considered in the court to population ratio and the geographical placement of facilities within the region.

Regional Recommendations

Infrastructure

- More tennis courts are required in this region
 - Kippax should be expanded to a District Tennis Centre (8+ courts) to cater for growth in West Belconnen
 - Consideration should be given to a new facility to replace the loss of the Hawker Tennis Centre
 - Consider expansion of Belconnen Tennis Centre to a Large Community Tennis Centre (12+ courts) to cater for population growth in Belconnen Town Centre and the greater Belconnen area.
- Consider construction of ANZ Tennis Hot Shots courts (or increase number of existing) to cater to the growth in the 5-14 year old age group
- Ensure a suitable number of soft surfaces to cater to the high percentage of 70+ participants

Management

- Increase capacity of junior program, particularly, ANZ Tennis Hot Shots (ANZTHS), ANZTHS Match Play, competitions and junior Canberra Tennis League, tournaments and the Tennis in Schools Program to cater to the growth in the 5-14 year old age group
- Expand the range of competitive and social tennis options that target the 35+ market (i.e. Book A Court, FAST4 and Cardio Tennis), including family memberships and activities.
- Provide flexible membership opportunities
- Provide an active club environment that appeals to families and the 35+ market
- Lower than average membership, so increase membership options
- Increase programs targeting girls aged 10 – 19, women aged 35 – 44 and 55-59

Age

- The clubs in the region should consider constructing ANZTHS courts to meet the demand for programs. Additional ANZTHS programs should be offered including ANZTHS Match Play.
- Junior coaching programs should expand and need to include competitions and tournaments.
- A full range of competitive and social options should be provided to appeal to the over 35 year olds, including family membership and activities, as well as flexible participation opportunities and an active club environment.
- Junior coaching programs should also try to build stronger links with Tennis in Schools programs to take advantage of the growing 10-14 age group.

Gender

- Increase programs targeting girls aged 10 – 19, women aged 35 – 44 and 55-59

Programs

- Target memberships and participation programs for the 10 – 24 and over 44 age groups

3.4.3 Gungahlin Regional Summary

Facility and court number summary table

Gungahlin		Population = 71,142 (2016)
Estimated Population 2020	83,167	
Tennis ACT Members 2017	533 (0.76% of population)	
ANZ Tennis Hot Shots	477 (2.2% of population)	
Cardio Tennis	0	
Book a Court	347 (0.49% of population)	
Tennis in Schools	9,007	
Estimated participants 2016 AusPlay (Member %)	3,405 (1,644, 2.35%)	
Estimated participants 2026 AusPlay	5,002 (growth 1,598, 47%)	
Regional Tennis Centre 16+ courts	N/A	
Large Community Tennis Centre 12+ courts	N/A	
District Tennis Centre 8+ courts	N/A	
Local Tennis Centre 4+ courts	N/A	
Public Access Centre 1+ courts	Gungahlin College – 2 courts* Gold Creek Country Club – 2 courts*	
Total number of courts	4*	
Estimated court to population ratio (2020)	0:83,167	
Court to population ratio (2016)	0:71,142	
Court to population ration (2011)	0:49,734	
Court to population ratio (2008)	1:18,225	
Members per court	N/A	
Participants per court	N/A	

*Note whilst Gungahlin College and Gold Creek Country club have 2 courts associated with them these are not deemed as being facilities or venues by any stretch. They are not affiliated and don't offer the necessary amenities, programs or services etc. Thus they have not been factored into ratios but are recognised. The Gungahlin College courts have hard wire metal frame nets and are open to vandalism. Gold Creek Senior School asphalt courts (4) are deemed unsafe and unplayable for all intents and purposes. However, this is a priority project from a Schools Infrastructure Strategy.

Insights

- Significant undersupply of tennis courts, with no courts at proper facilities / venues* provided in the region.
- Court to population ratio is currently 0:71,142 which has decreased from 2008, which was 1:18,225.
- Significant growth of tennis participation expected once courts are available in the region

Regional Recommendations

Infrastructure

- Construct at least two tennis facilities of at least District Tennis Centre (8+ courts) size, but preferably both of Large Community Tennis Centre (12+ courts) size
- Any new facility constructed should include dedicated ANZ Tennis Hot Shots courts and needs to have suitable facilities to host tournaments, competitions, as well as have suitable amenities to be able to host social events and meet diverse membership requirements
- The region will require 50 courts to meet the population needs, so multiple facilities need to be considered
- One of the facilities should include the provision of indoor tennis courts

Management

- Preferred management model would be a Community Activity Hub or at least some form of professional management to ensure appropriate program diversity to service the area and improve sustainability

Age

- Any new facility constructed should include dedicated ANZTHS courts and needs to have suitable facilities to host tournaments, competitions, as well as have suitable amenities to be able to host social events and meet diverse membership requirements

Gender

- Program options should include programs specifically targeting women aged 20-24, 35-39 and 60-64

Programs

- Lack of venues and programming needs to be addressed

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3.4.4 Molonglo (Cotter-Namadgi) Regional Summary

Facility and court number summary table

Molonglo	Population = 4,758 (2016) Population = 5,448 (projected for data comparison)
Estimated Population 2020	13,025
Tennis ACT Members 2017	26 (0.48% of population)
ANZ Tennis Hot Shots	12 (1.00% of population)
Cardio Tennis	0
Book a Court	N/A data unavailable
Tennis in Schools	0
Estimated participants 2016 AusPlay (Member %)	245 (88, 1.62%)
Estimated participants 2026 AusPlay	1,284 (growth 1,039, 425%)
Regional Tennis Centre 16+ courts	N/A
Large Community Tennis Centre 12+ courts	N/A
District Tennis Centre 8+ courts	N/A
Local Tennis Centre 4+ courts	N/A
Public Access Centre 1+ courts	N/A
Total number of courts	0
Estimated court to population ratio (2020)	0:13,025
Court to population ratio (2016)	0:4,758
Members per court	N/A
Participants per court	N/A

Insights

- No current facility in Molonglo as it is a newly developed region.
- Need to plan provision of tennis facilities that provides for the new communities' recreation needs.
- Low membership to population ratio

Regional Recommendations

Infrastructure

- Tennis ACT & ACT Government should start planning for the construction of a District Tennis Centre (8+ courts) that has the capacity to expand to a Regional Tennis Centre (16+ courts) as population requires. Ideally, the facility would open around 2021/22.
- Weston Creek should target local area marketing to this region to increase participation.

Management

- Preferred management model would be a Community Activity Hub or at least some form of professional management to ensure appropriate program diversity to service the area and improve sustainability

Age

- Any new facility constructed should include dedicated ANZTHS courts and needs to have suitable facilities to host tournaments, competitions, as well as have suitable amenities to be able to host social events and meet diverse membership requirements

Gender

- Insufficient data for any significant insights.

Programs

- Lack of venues and programming needs to be addressed

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3.4.5 North Canberra Regional Summary

Facility and court number summary table

North Canberra	Population = 53,002 (2016) Population = 54,350 (projected for data comparison)
Estimated Population 2020	58,702
Tennis ACT Members 2017	1,864 (3.43% of population)
ANZ Tennis Hot Shots	161 (1.6% of population)
Cardio Tennis	9 (0.02% of population)
Book a Court	1,333 (2.45% of population)
Tennis in Schools	4,217
Estimated participants 2016 AusPlay (Member %)	2,522 (5,777, 10.63%)
Estimated participants 2026 AusPlay	3,101 (growth 579, 23%)
National Tennis Centre 20+ courts	Lyneham – 28 courts + 4 Hot Shots courts
Regional Tennis Centre 16+ courts	N/A
Large Community Tennis Centre 12+ courts	N/A
District Tennis Centre 8+ courts	N/A
Local Tennis Centre 4+ courts	Braddon – 4 courts Campbell – 4 courts Majura – 4 courts O'Connor – 4 courts Reid – 4 courts Turner – 4 courts
Public Access Centre 1+ courts	Ainslie – 3 courts ANU – 2 courts
Total number of courts	57
Estimated court to population ratio (2020)	1:1,030
Court to population ratio (2016)	1:930
Court to population ration (2011)	1:846
Court to population ratio (2008)	1:820
Members per court	33
Participants per court	44

Insights

- High proportion of 4 court facilities
- No facilities with courts between 5 to 28 courts

- Above target of court to population ratio, so facility rationalisation could be considered on the surface. However this is not being recommended at present. *It is very important to note that the court to population ratio only considers residential location and not work location. This region has a very high percentage of the population working in the region, which also needs to be considered. Likewise, continued desires and efforts to add further density in this region needs to be factored in and the population will continue to grow which in turn will alter the ratio.*
- High membership rates and member per court ratio suggest that courts are well utilised. Individual club occupancy needs to be examined to assess individual venue performance

Regional Recommendations

Infrastructure

- Overall population growth of 20.5% over the next 10 years needs to be considered in the context of the current supply of courts.

Management

- Clubs should ensure they have a professional coach providing an active junior program, as well as membership opportunities that provide a full range of competitive and social options, family memberships and activities, club environments and flexible opportunities.
- Introduce programs specifically targeting membership from women aged 20-24 and 50-54.
- Establish a membership model or program that retains membership from 15-19 year olds through to their 40s.
- ANZ Tennis Hot Shots only offered at 5 of 9 venues (56%) in North Canberra
- The focus in this region is improving the sustainability and management of Local Tennis Centres (4+ courts).

Age

- Growth in the under 24 age groups indicate clubs should plan for dedicated ANZ Tennis Hot Shots courts and venue upgrades that cater to the heightened demand for ANZ Tennis Hot Shots, junior competition / tournaments, Tennis in Schools, Talent ID and coaching programs.

Gender

- Introduce programs specifically targeting participation from women aged 20-24 and 50-54. Establish a membership model or program that retains participation from 15-19 year olds through to their 40s.

Programs

- Compared to membership, participation in ANZ Tennis Hot Shots, Cardio Tennis and Book a Court are very poor. Latest Book A Court data overlay may change this picture "post COVID"
- Tennis ACT should ensure the clubs in the region are delivering these programs to an appropriate standard where possible.
- Lack of ANZTHS programming needs to be addressed. Only offered at 5 of 9 venues (56%)

3.4.6 South Canberra Regional Summary

Facility and court number summary table

South Canberra	Population = 27,007 (2016) Population = 26,425 (projected for data comparison)
Estimated Population 2020	27,618
Tennis ACT Members 2017	755 (2.86% of population)
ANZ Tennis Hot Shots	75 (1.3% of population)
Cardio Tennis	3 (0.01% of population)
Book a Court	1,429 (5.41% of population)
Tennis in Schools	3,487
Estimated participants 2016 AusPlay (Member %)	1,276 (2,315, 8.76%)
Estimated participants 2026 AusPlay	1,441 (growth 164, 13%)
Regional Tennis Centre 16+ courts	N/A
Large Community Tennis Centre 12+ courts	N/A
District Tennis Centre 8+ courts	N/A
Local Tennis Centre 4+ courts	Barton – 4 courts Eastlake – 4 courts Forrest – 6 courts Old Parliament House – 5 courts Red Hill – 4 courts Yarralumla – 4 courts
Public Access Centre 1+ courts	N/A
Total number of courts	27
Estimated court to population ratio (2020)	1:1,023
Court to population ratio (2016)	1:1,000
Court to population ration (2011)	1:928
Court to population ratio (2008)	1:2,428
Members per court	28
Participants per court	47

Insights

- All facilities within South Canberra are Local Tennis Centre sized.
- Above target of court to population ratio, so facility rationalisation could be considered on the surface. However this is not being recommended at present. *It is very important to note that the court to population ratio only considers residential location and not work location. This region has a very high percentage of the population working in the region, which also needs to be considered. Likewise, continued desires and efforts to add further*

density in this region needs to be factored in and the population will continue to grow which in turn will alter the ratio.

- High membership rates and member per court ratio suggest that courts are well utilised. Individual club occupancy needs to be examined to assess individual venue performance

Regional Recommendations

Infrastructure

- Aging infrastructure needs to be replaced and then maintained to a higher standard.
- This region would also benefit from dedicated Hot Shots courts being constructed at schools and clubs.

Management

- The focus in this region is improving the sustainability and management of Local Tennis Centres (4+ courts).

Age

- Ensure programs are catering to an increase in demand for ANZTHS Match Play, junior pennant and competition / tournaments, Tennis in Schools, Talent ID, coaching programs and the transition to adult competition / tournaments.
- Clubs should offer a full range of competitive and social options, family memberships and activities, club environments and flexible opportunities.
- Clubs need to ensure they are capturing DOB from members.
- There needs to be an increase in ANZTHS programs targeting 5-9 year olds.
- Family memberships and gross motor skill programs need to be offered to capture 0-4 year olds.

Gender

- Targeted programs for 30-34 year olds, particularly females need to be developed.

Programs

- Need to increase the number of venues offering ANZ Tennis Hot Shots and/or improve the delivery of the program.

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3.4.7 Tuggeranong Regional Summary

Facility and court number summary table

Tuggeranong	Population = 85,154 (2016) Population = 85,138 (projected for data comparison)
Estimated Population 2020	82,649
Tennis ACT Members 2017	405 (0.48% of population)
ANZ Tennis Hot Shots	241 (1.1% of population)
Cardio Tennis	14 (0.02% of population)
Book a Court	346 (0.41% of population)
Tennis in Schools	3,168
Estimated participants 2016 AusPlay (Member %)	4,163 (1,200, 1.41%)
Estimated participants 2026 (AusPlay)	3,835 (decline -328, -8%)
Regional Tennis Centre 16+ courts	N/A
Large Community Tennis Centre 12+ courts	N/A
District Tennis Centre 8+ courts	Fadden – 11 courts (Mpowerdome closed)
Local Tennis Centre 4+ courts	Erindale – 4 courts Kambah – 4 courts The Pines – 4 courts
Public Access Centre 1+ courts	N/A
Total number of courts	23 (or 12 if Mpowerdome remains closed)
Estimated court to population ratio (2020)	1:3,593 (1:6,887)
Court to population ratio (2016)	1:3,702 (1:7,096)
Court to population ration (2011)	1:4,691
Court to population ratio (2008)	1:3,350
Members per court	18 (34)
Participants per court	181 (347)

Insights

- The closure of Mpowerdome has significantly compounded the issue of an undersupply of tennis courts in Tuggeranong
- Court to population ratio is 1:7,096
- Generally, there was a good spread of facilities throughout the region prior to the closure of Mpowerdome, however an additional provision of courts is required to improve access to courts in this region and there is a lack of facilities in the far south
- The revitalisation and affiliation of Tharwa (2), Fadden Hills (2) and Tuggeranong Vikings (4) could bring court to population ratio back to acceptable levels, 1:2,747
- Membership ratio to population is very poor

Regional Recommendations

Infrastructure

- A solution for the reinstatement of tennis programming at Mpowerdome or an alternative for the loss of courts.
- The revitalisation and affiliation of Tharwa (2), Fadden Hills (2) and Tuggeranong Vikings (4).
- Expand The Pines Tennis Club to District Tennis Centre size (8+ courts). This could potentially be achieved by partnering with the Caroline Chisolm School Senior Campus to utilise their existing infrastructure.
- Utilisation of the Wanniassa Senior School (4 derelict and dilapidated asphalt courts with metal nets) should also be explored, potentially in partnership with the nearby Erindale Leisure Centre.

Management

- Clubs should offer a full range of competitive and social options, family memberships and activities, club environments and flexible opportunities.

Age

- Current membership rates are very low in the region, so a significant increase in programming and resulting membership needs to occur before projected changes in age groups are considered in infrastructure and management changes.
- Clubs need to ensure they are capturing DOB from members.
- There needs to be an increase in ANZTHS programs targeting 5-9 year olds.
- Family memberships and gross motor skill programs need to be offered to capture 0-4 year olds.

Gender

- Targeted programs for 30-34 year olds, particularly females need to be developed.

Programs

- ANZTHS only offered at 2 of 4 venues (50%) in Tuggeranong
- Lack of access to all programming in Tuggeranong

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3.4.8 Weston Creek and Woden Valley Regional Summary

Facility and court number summary table

Weston Creek & Woden Valley	Population = 57,728 (2016) Population = 56,539 (projected for data comparison)
Estimated Population 2020	55,162
Tennis ACT Members 2017	648 (1.15% of population)
ANZ Tennis Hot Shots	601 (4.3% of population)
Cardio Tennis	1
Book a Court	781 (1.38% of population)
Tennis in Schools	4,229
Estimated participants 2016 AusPlay (Member %)	2,729 (2,061, 3.64%)
Estimated participants 2026 (AusPlay)	2,633 (decline -96, -4%)
Regional Tennis Centre 16+ courts	N/A
Large Community Tennis Centre 12+ courts	Weston Creek – 12 courts
District Tennis Centre 8+ courts	North Woden – 8 courts
Local Tennis Centre 4+ courts	Southlands – 4 courts
Public Access Centre 1+ courts	Torrens – 2 courts
Total number of courts	26
Estimated court to population ratio (2020)	1:2,122
Court to population ratio (2016)	1:2,220
Court to population ration (2011)	1:2,595
Court to population ratio (2008)	1:2,127
Members per court	25
Participants per court	105

Insights

- Good spread of facilities between 2 and 12 courts across the two regions.
- Court to population ratio generally meets TA's court to population ratio.
- Membership ratio to population is poor – this may be a result of the lack of membership data from all clubs at the time

Regional Recommendations

Infrastructure

- Installation of ANZ Tennis Hot Shots courts at North Woden
- Resurfacing of all 8 courts and lighting upgrade at North Woden
- Resurfacing of all 12 courts and lighting upgrade at Weston Creek as well as clubhouse upgrade

Management

- Weston Creek will need to service the southern suburbs of Molonglo (Wright & Coombs) until a facility is built in the Molonglo. This should make for relatively stable membership rates even though the population is declining. The management focus should be ensuring the programming is meeting current demands.
- Family memberships and gross motor skill programs need to be offered to capture 0-4 year olds.
- Weston Creek should target local area marketing in Molonglo to increase participation in this region.
- The focus in this region is improving the sustainability and management of facilities.
- Weston Creek should explore professional management to improve programming and amenity

Age

- Weston Creek (and to a lesser extent North Woden) will need to service the southern suburbs of Molonglo (Wright & Coombs) until a facility is built in the Molonglo region. This should make for relatively stable participation rates even though the population is declining. The management focus should be ensuring the programming is meeting current demands.
- Clubs need to ensure they are capturing DOB from members.
- There needs to be an increase in ANZ Tennis Hot Shots programs targeting 5-9 year olds.
- Family memberships and gross motor skill programs need to be offered to capture 0-4 year olds.

Gender

- Targeted programs for 30-59 year olds, particularly females need to be developed.

Programs

- No specific comments from programming data, management, age and gender recommendations should influence programming changes.

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3.4.9 Tennis Facility Assets Audit

In September 2013, Tennis ACT and Tennis Australia commissioned InsideEDGE Sports and Leisure Planning to conduct a full audit of 24 Tennis ACT affiliated tennis facilities. A summary of the key findings is provided below.

Courts

- Without immediate resurfacing, up to 35% of courts could be unusable within the next 12 months.
- To retain the appropriate standards up to 56% of courts need to be resurfaced within the next 3 years.
- Up to 22% of courts appear to have a remaining life of 6 or more years.

Surface Types

- 3 out of every 4 courts (76%) are synthetic grass
- Up to 33% of synthetic grass courts have 0-1 year remaining on their ideal lifecycle
- Up to 63% of synthetic grass courts have under 3 years remaining on their ideal lifecycle
- 9% of courts are acrylic
- 14% of courts are natural clay or porous
- Poor surface mix with synthetic grass being the predominate surface in the ACT

Fencing and Lighting

- 27% of all fencing requires replacement within the next 12 months to meet the appropriate standards
- 48% of all fencing should be replaced within the next 3 years to retain the appropriate standard
- 74% of venues have over 6 years remaining on their lighting's ideal lifecycle

Nets and Net Posts

- 50% of all nets require replacement within the next 3 years, the remaining 50% of nets have at least 4 years remaining on their ideal lifecycle.
- Net posts are considered in good condition with most net posts having an ideal lifecycle of 6 or more years remaining.

A full breakdown of the proposed capital works and expenditure is available in the *Strategic Facilities Costings*.

Recommendation 12:

Another audit of tennis facilities should be conducted ASAP and should be conducted every 5 years. This should be conducted utilising the Tennis Australia templates.

3.4.10 Rationalisation of Tennis Facilities

Tennis ACT has been working with ACT Government to address the shortage of facilities in certain geographic regions of the ACT by focusing on the court to population ratios of these regions. This has highlighted that North Canberra and South Canberra currently exceed the target court to population ratio of 1:2,000. These two central regions have a high percentage of Local Tennis Centres, which due to their small size are challenging to manage in a sustainable manner and have historically required ACT Government funding for the maintenance of their facilities.

These factors have led the *Review of Tennis Facilities in the ACT (2009)* and the *Strategic Tennis Facility and Management Review (2015)* to consider the potential rationalisation of these Local Tennis Centres to bring the court to population ratio back toward the recommended ratio, allow any financial gain from the sale of the asset to be reinvested in areas of need and alleviate some of the competition for similar facilities with a view to make them more sustainable.

What had **not** been considered in these equations is the ACT Government's development policy for urban infill and the future population growth in central Canberra (North Canberra growth 20.5% over the next 10 years), as well as the temporary working population that travel into these regions on their regularly daily commute. The 2016 census identifies that 34,000 people commute into Civic (North Canberra) and 11,500 into Barton (South Canberra) as part of their daily work commute. Assuming people participate in sport close to their workplace and with both North Canberra and South Canberra major employment hubs, the temporary population commuting into these regions is a key consideration in the calculation of the court to population ratio.

The participation rates compared to court to population should also be considered relevant. The following table summarises all these considerations.

Region	Court to Population Ratio (current)	Court to Population Ratio (incl. workforce)	Participation Percentage (member %)
Belconnen	1:4,002	1:4,563 (+13,455)	3.42%
Gungahlin	0:71,142	0:74,991 (+3,849)	2.35%
Molonglo	0:4,758	0:4,758 (0)	1.62%
North Canberra	1:930	1:1,533 (+34,361)	10.63%
South Canberra	1:1,000	1:1,429 (+11,587)	8.76%
Tuggeranong	1:7,096	1:7,876 (+10,359)	1.41%
Weston Creek & Woden Valley	1: 2,220	1:2,719 (+12,968)	3.64%

Table 9 - Court to Population Ratio including commuting workforce

A key consideration of any debate about rationalisation of community tennis clubs, is the community club itself. These incorporated associations are made up of volunteers representing the private members of these clubs and are the entity that holds the lease. Tennis ACT would not support any proposed rationalisation that disadvantages these members and is against the wishes of the incorporated association that holds the lease.

Recommendation 13:

In consideration of the current court to population ratio inclusive of workforce commuters plus density / infill ambitions, it is recommended rationalisation should not be considered, unless there are significant extenuating circumstances, such as failure to comply with the lease conditions, the club entering administration or irreversible asset failure and disrepair.

3.5 Tennis venue management and occupancy

Tennis venues in the ACT are currently managed in a range of ways, five⁵ venues are professionally managed (including by tennis coaches), 22 are run by volunteer clubs or organisations and zero are directly managed by local government (these venues generally offer free access to courts).

3.5.1 Best practice venue management for every community

Quality venues are vital to the continued growth of the sport. Importantly, these venues need to be sustainable, and the key to this is through strong participation and usage incorporated with effective management systems, procedures and policies. These management practices and techniques encourage quality customer experiences and ongoing participation, effective reporting and accountability to key stakeholders, asset management and maintenance as well as business planning, strategic planning and budgeting processes.

These increasing areas of compliance are becoming normal expectations across all levels of the sport with Local Government as asset owners expecting regular maintenance, reporting and compliance and Tennis Australia providing resources and tools for ongoing planning, budgeting and industry benchmarking necessary for ongoing successful operations. These venue management areas combined create operational demands and place an ever-increasing demand on the time, skills and expertise of local volunteer committees which are facing a decline in volunteerism and committee succession planning is becoming a major issue moving forward. This makes the selection of the most appropriate venue management model as well as the tools and resources to assist each model important when considering the 'best practice' delivery of tennis in each venue.

Many of Tennis Australia's objectives are mirrored by those of Local Government. To achieve these mutual objectives, there are some key pillars that must be in place at local venues. Through significant consultation with Local Governments around Australia, these pillars have been distilled in to four key areas. Tennis Australia's four pillars for venue management underpin the key principles to secure healthy and vibrant tennis facilities servicing the community well into the future.

The four pillars are:

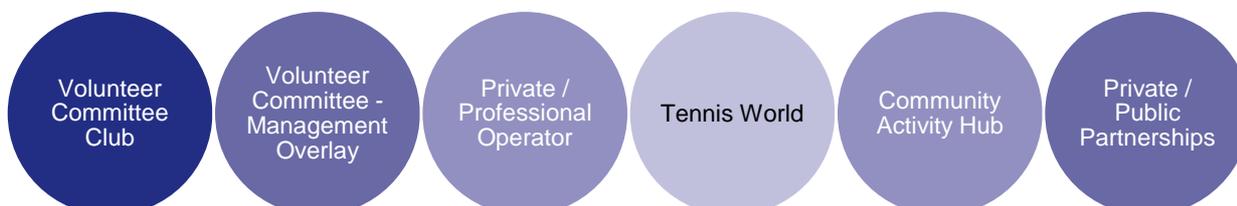
- Sustainability
- Community benefit
- Accessibility
- Accountability

Each pillar represents a 'non-negotiable' principle that should be strived for at every tennis venue regardless of its size, geographical location or management model. How these objectives are achieved may vary from state to state and venue to venue, however the core objectives remain relevant. See Figure 2 - Tennis Australia Four Pillars of Successful Tennis Venues for a summary of these objectives.

3.5.2 Scalable models for tennis delivery

Given that every community is unique and has different needs and expectations there is not one sole solution for tennis venue management. What meets the needs of one LGA may not suit another and further to that each venue has different outcomes based on size and location that means that any given LGA may have multiple management models operating their venues.

The following management models have been identified as showing scalable structures, systems and procedures that can deliver best practice in tennis across a range of venues. Each of the models has specific strengths and deliverables through operation and have the capacity to meet the requirements of tennis venue management.



⁵ Includes MPowerdome, which was closed at the time of writing this report

Whilst Tennis Australia understands that there may be other management models operating within the industry the above highlight the general rule of available models that are governed and managed through Tennis Australia or are supported as meeting the needs of the sport and communities.

Some of the models have several different providers that meet the description and while we don't necessarily endorse any sole provider, Tennis Australia endorses and supports business models that benefit all interested parties in delivery of the sport.

3.5.2 Tennis Australia Management Models in a local planning context

Land zoning that is suitable for the development of tennis facilities needs to have *outdoor recreation* as a permitted use. Fortunately, outdoor recreation is a permitted use for commercial, industrial, community and recreational zoning in the ACT. The table below identifies the suitability of different Tennis Australia management models for specific ACT planning zones.

Tennis Australia Management Model suitability by ACT zoning	CZ6	IZ2	CFZ	PRZ1	PRZ2
Private / Public Partnership	*	*	*		*
Community Activity Hub	*		*	*	*
Tennis World	*		*	*	*
Private / Professional Operator	*		*		*
Volunteer Committee – Management Overlay				*	*
Volunteer Community Club				*	*

CZ6 – Leisure and Accommodation Zone

Relevant Minimum Assessment – aquatic recreation facility, club, commercial accommodation, community use, indoor recreation and outdoor recreation.

This zoning provides maximum flexibility for multi-use management models. The ability to provide aquatics, club, accommodation and indoor recreation is particularly attractive for Private / Public Partnership and Community Activity Hub models. It is not preferred for volunteer committee structures due to the premium value of the land, higher rates and potentially more restrictive development codes adding additional capital costs.

CZ1, CZ2, CZ3 and CZ5 all provide provision for outdoor and indoor recreation, so are also suitable for multi-use management models.

The proximity of commercial zones to public transport and other amenities makes it highly attractive for more sophisticated management models.

IZ2 – Industrial Mixed Use Zone

Relevant Minimum Assessment – club, community use, indoor recreation and outdoor recreation.

This is not a preferred zoning for tennis facilities, but may be suitable in the context of a Private / Public Partnership, particularly where a larger facility may be a recreation destination, attracting people from their homes outside the zone or by its proximity to where people work and attracting participation before or after work, or during lunch times.

CFZ – Community Facilities Zone

Relevant Minimum Assessment – child care, community activity centre, educational establishment, indoor recreation facility, office, outdoor recreation facility and parkland.

This zoning is most suitable for the Community Activity Hub model, which is intended to provide a multi-use facility for the local community. It aligns perfectly with the intent of the planning zones' objectives.

PRZ1 – Urban Open Space Zone

Relevant Minimum Assessment – aquatic recreation facility, community activity centre, outdoor recreation facility, parkland and playing field.

This zoning is better suited to smaller facilities situated in parkland and therefore better suited to a Volunteer Community Club model, but with the addition of aquatics, playing fields, community activity, other outdoor recreation and playing fields, it could be well suited to a Community Activity Hub (CAH) model. The application of the CAH model would depend on the ability of the development to still present within the intent of Urban Open Space.

PRZ2 – Restricted Access Recreation Zone

Relevant Minimum Assessment - aquatic recreation facility, club, community activity centre, educational establishment, hotel, indoor recreation, outdoor recreation, parkland and playing field.

This is the zoning best suited to all models.

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3.6 Stakeholder consultation

Stakeholder consultation is an important process in the development of community based planning and provides opportunities for all stakeholders to contribute.

The table below indicates the consultation that took place in the preparation of the *Strategic Tennis Facility and Management Review* released in 2015 and more recently in the preparation of this report.

Stakeholder	Consultation method	Consultation outcome
Tennis Clubs and venue operators	<ul style="list-style-type: none"> Individual meetings with CEO and Participation Leader / Club Development Officer Club forums Survey response to facility reports 	<ul style="list-style-type: none"> General support for increased assistance from Tennis ACT with venue management Concern over lack of ACT Government funding for asset repair and maintenance Concern over ACT Government charges on community run facilities Concern over lack of facilities in population growth areas
Tennis coaches	<ul style="list-style-type: none"> Individual meetings with CEO and Participation Leader / Club Development Officer Coach forums Survey response to facility reports 	<ul style="list-style-type: none"> Concern over the standard of volunteer run facilities Concern over lack of ACT Government funding for asset repair and maintenance Concern over lack of facilities in population growth areas
Community Councils	<ul style="list-style-type: none"> Individual meetings with CEO Presentations at public meetings 	<ul style="list-style-type: none"> Concern over lack of facilities in immediate region Concern over standard of facilities
Local residents	<ul style="list-style-type: none"> Social media posts Q & A sessions at public Community Council meetings 	<ul style="list-style-type: none"> Concern over lack of facilities in immediate region Concern over standard of facilities

SECTION 4: RECOMMENDATIONS

4.1 Priorities for developing tennis - Recommendations

The following key priorities have been identified within three key areas of tennis; participation, club/venue management and infrastructure.

Participation	Club/Venue Management	Infrastructure
<ul style="list-style-type: none"> Work with Member Association, local clubs, venue operators and schools to introduce Book a Court Tennis Australia's online booking and integrated gated access system to facilitate public access. Support the growth in ANZ Tennis Hot Shots by encouraging transition to Hot Shots Leagues and match play. Recognise the participation barriers of under-represented sectors of the local community and work with stakeholders to develop strategies and targeted sustainable programs to meet specific needs. Support the local tennis community to provide a Tennis Australia accredited coach (or access to one) at each tennis venue. Support centralised registration, resourcing and delivery of programming at venues that lack the resources to provide this service on their own. 	<ul style="list-style-type: none"> Ensure Tennis Australia Operational Health Checks are completed annually (transition to Venue Sustainability Rating – VSR tool). Ensure all tennis clubs and venues have current and documented occupancy agreements, key performance measures in place and active oversight from local government or other site owner / manager. Set up regular meetings and review operations reports provided by operator to track participation, engagement and particular successes. Assist and incentivise Volunteer Committee Clubs to transition to professional management models Educate and train coaches in best practise venue management to assist with the potential transition of Volunteer Committee Clubs to professional management 	<ul style="list-style-type: none"> Build facilities in areas of need and plan for future population growth. Conduct periodical tennis facility and condition audits that match with occupancy agreements / tenure to inform future priorities and responsibilities. Review all club projects including Asset Repair & Maintenance (ARM) items and Major Asset Replacement & Renewal (MARR) items with a strategy for each with ACT Government. Review ACT Government investment into community tennis clubs and their ongoing sustainability. Ensure courts across the Territory provide a mix of surface types to support recreational and competition pathways and player development activities. Implement blended ANZ Tennis Hot Shots line marking on existing hard court tennis surfaces at existing professionally managed and club venues. Seek to floodlight (LED) existing tennis courts at existing professionally managed and club venues to a level appropriate to increase participation opportunities and access to tennis. Explore partnerships with educational institutions to access existing tennis infrastructure in regions with high court to population ratios

In addition to the above recommendations, this report has highlighted 13 more specific recommendations based on the tennis participation data for the ACT and other specific local considerations (ordered as they appear in report in terms of flow / sequencing).

- The five year exemption on fixed rates charges was initially provided however this was set to expire on 30 June 2018 yet has been acknowledged and extended. A review of rates is requested. It needs to be a priority that

- ACT Government considers this a permanent exemption to the fixed rates charges as a minimum however further review and solutions should be explored.
2. Tennis ACT should assess all current affiliated tennis venues with the Four Pillars Assessment Tool and assist the venues with addressing any identified issues.
 3. There should be a concerted effort between Tennis Australia, Tennis ACT and the affiliated tennis venues to improve Book a Court system data to include accurate gender, date of birth, postcode and primary place of play. The program should continue to be implemented at all affiliated venues, including public courts and schools. It's ability to open up the courts to the community through an easy online booking process, capture revenue for the club or venue operator and capture participation data will be valuable to the future of the sport and should continue to be a high priority.
 4. A review of the barriers for delivery and participation of Cardio Tennis should be conducted to understand whether they are preventing greater implementation of the program. It appeals to an important market segment, so efforts for greater participation should be explored prior to abandoning the program.
 5. Clubs/Tennis venues need to consider their membership value proposition and associated programs in relation to the demographics in their immediate region, the participation by life stage and modern consumer's needs. Currently, the overwhelming majority of clubs provide an annual lump sum membership, requiring annual renewal. This causes a barrier to renewal, is now antiquated and not best practise in the health and leisure industry. ClubSpark is having a positive influence in this area. Clubs should consider membership models that operate on a fortnightly direct debit with auto renewal. Tennis ACT should ensure that the My Tennis & ClubSpark systems support this model and assist clubs in making the transition. Ease of administration is vital for Volunteer Community Clubs and it may be that they need to move to a professional management model to implement these type of changes in membership model. A professional management model also allows a greater diversity of programming and could improve the standards of facilities and asset management. Canberra Tennis Centre needs to engage and convert the high percentage of members in the Childhood life stage into the ANZ Tennis Hot Shots program.
 6. Tennis ACT should continue to monitor participation rates, retention / churn and player satisfaction for Canberra Tennis League competition and where appropriate react and adapt to feedback from the playing community. A variety of competition formats and in-house competitions should be considered to supplement the current Canberra Tennis League offering.
 7. The Tennis in Schools program needs to continue its current strategy of targeting regions with lower participation opportunities and look to improve its conversion rate by facilitating strong partnerships with local coaches delivering programs in nearby clubs.
 8. A better spread of Tennis Australia Facility Hierarchy is highly desirable. Any new facilities should be of at least District Tennis Centre (8+ courts) size and ideally Large Community Centre (12+ courts) size, due to the greater efficiencies of a 12-court facility (as identified by the Operational Health Check benchmarks).
 9. Clubs should plan to improve their amenities to cater to modern consumer needs. There is a lack of Canteen/Kiosk/Café and Pro Shop facilities severely limiting revenue opportunities and basic amenity. Clubs should consider transitioning their management model to be able to provide these services.
 10. Clubs should explore professional management models to make them less reliant on volunteers which in turn allows volunteer time to be focused on other key areas. The Facilities & Planning Manager should survey the clubs with the Tennis Australia Services Sheet to gain more granular data.
 11. There is currently a very poor geographic spread of affiliated tennis facilities in the ACT. With no facilities in Gungahlin and Molonglo. Tennis ACT and ACT Government should make it the highest priority to ensure there is appropriate access for local communities to tennis facilities. Construction of a tennis facility in Gungahlin should be the highest priority, but also ensuring an appropriate geographic spread of tennis courts that are consistent with the Tennis Australia guidelines for court to population ratio of 1:2,000. That is one court per 2,000 people.
 12. Another audit of tennis facilities should be conducted ASAP and should be conducted every 5 years. This should be conducted utilising the Tennis Australia templates.
 13. In consideration of the current court to population ratio inclusive of workforce commuters plus density / infill ambitions, it is recommended rationalisation should **not** be considered, unless there are significant extenuating circumstances, such as failure to comply with the lease conditions, the club entering administration or irreversible asset failure and disrepair.

In addition to the 13 recommendations, sections 3.4.1 to 3.4.8 provide a range of specific regional recommendations based on Infrastructure, Management, Age, Gender and Program insights specific to each region.

4.2 Turning priorities into actions

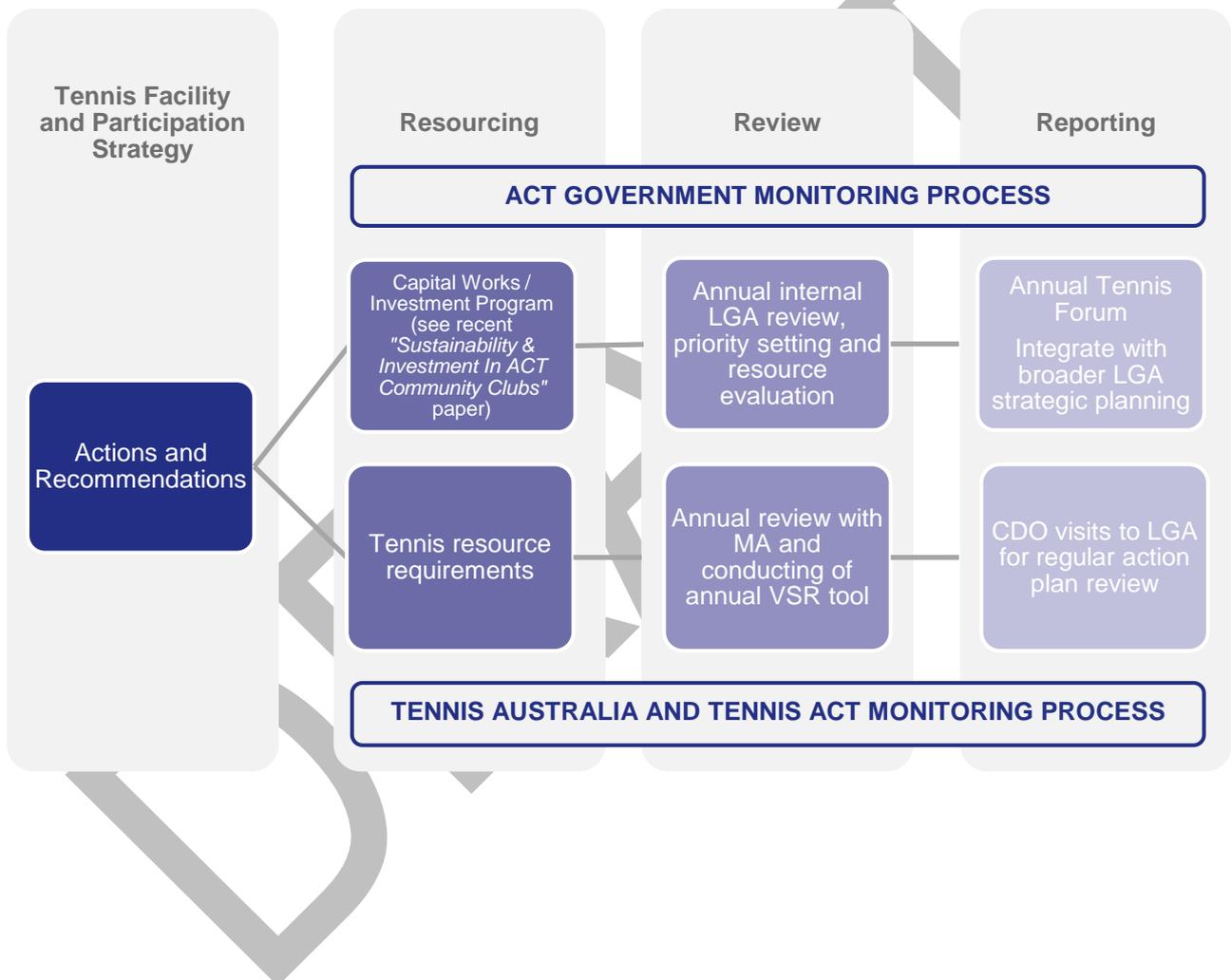
The attached action plan is designed to align and integrate with existing local government planning and capital works programs to identify key priorities, and document recommendations for supporting tennis in to the future.

See attachment 1 – Club/Venue Management Action Plan

This plan is to be completed in consultation with the Tennis ACT CEO and Facilities & Planning Manager.

4.3 Monitoring, measuring and evaluating

In line with best practice planning and evaluation, a regular evaluation process will assist in ensuring this action plan progresses and that it remains relevant. To this end the following implementation, monitoring and reporting system is provided to guide an effective evaluation process.



SECTION 5: ATTACHMENTS

Attachment 1 – Club/Venue Management Action Plan

This plan is to be completed in consultation with the Tennis ACT CEO and Facilities & Planning Manager.

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Attachment 2 – Tables & Graphs

3.2.1.1 Belconnen

Age Group	2016		2021		2026		Change (#) between 2016 & 2026	Change (%) between 2016 & 2026
	Number	%	Number	%	Number	%		
0 to 4	7,045	7.2%	7,005	6.9%	6,957	6.6%	-88	-1.2%
5 to 9	6,081	6.3%	6,513	6.5%	6,763	6.4%	682	11.2%
10 to 14	5,100	5.2%	5,624	5.6%	6,150	5.8%	1,050	20.6%
15 to 19	5,490	5.6%	5,758	5.7%	6,383	6.1%	893	16.3%
20 to 24	8,138	8.4%	8,236	8.2%	8,579	8.1%	441	5.4%
25 to 29	8,575	8.8%	7,789	7.7%	7,741	7.3%	-834	-9.7%
30 to 34	8,235	8.5%	8,169	8.1%	7,700	7.3%	-535	-6.5%
35 to 39	7,176	7.4%	7,727	7.7%	7,908	7.5%	732	10.2%
40 to 44	6,496	6.7%	6,541	6.5%	7,316	6.9%	820	12.6%
45 to 49	5,943	6.1%	6,215	6.2%	6,372	6.0%	429	7.2%
50 to 54	5,130	5.3%	5,557	5.5%	5,878	5.6%	748	14.6%
55 to 59	5,257	5.4%	4,872	4.8%	5,273	5.0%	16	0.3%
60 to 64	5,054	5.2%	4,956	4.9%	4,676	4.4%	-378	-7.5%
65 to 69	4,933	5.1%	4,738	4.7%	4,730	4.5%	-203	-4.1%
70 to 74	3,355	3.5%	4,402	4.4%	4,334	4.1%	979	29.2%
75 to 79	2,223	2.3%	2,965	2.9%	3,918	3.7%	1,695	76.2%
80 to 84	1,491	1.5%	1,834	1.8%	2,462	2.3%	971	65.1%
85+	1,521	1.6%	1,891	1.9%	2,357	2.2%	836	55.0%
Total	97,244	100%	100,792	100%	105,498	100%	8,254	8.5%

Table 10 - Belconnen age profile 2016, 2021 & 2026

3.2.1.2 Gungahlin

Age Group	2016		2021		2026		Change (#) between 2016 & 2026	Change (%) between 2016 & 2026
	Number	%	Number	%	Number	%		
0 to 4	6,994	10.0%	8,119	9.4%	8,815	8.8%	1,822	26.0%
5 to 9	5,760	8.2%	7,497	8.7%	8,417	8.4%	2,656	46.1%
10 to 14	4,624	6.6%	6,146	7.1%	7,584	7.5%	2,959	64.0%
15 to 19	4,017	5.7%	4,887	5.6%	6,122	6.1%	2,106	52.4%
20 to 24	3,993	5.7%	4,841	5.6%	5,560	5.5%	1,567	39.2%
25 to 29	6,151	8.8%	6,790	7.8%	7,723	7.7%	1,573	25.6%
30 to 34	7,994	11.4%	8,832	10.2%	9,268	9.2%	1,274	15.9%
35 to 39	6,951	9.9%	9,053	10.4%	9,707	9.6%	2,756	39.6%
40 to 44	5,868	8.4%	6,969	8.0%	8,560	8.5%	2,692	45.9%
45 to 49	4,939	7.1%	6,082	7.0%	6,839	6.8%	1,900	38.5%
50 to 54	3,707	5.3%	4,969	5.7%	5,720	5.7%	2,013	54.3%
55 to 59	2,824	4.0%	3,722	4.3%	4,647	4.6%	1,822	64.5%
60 to 64	2,100	3.0%	2,783	3.2%	3,495	3.5%	1,395	66.4%
65 to 69	1,602	2.3%	2,041	2.4%	2,565	2.5%	964	60.2%
70 to 74	1,175	1.7%	1,742	2.0%	2,139	2.1%	964	82.0%
75 to 79	610	0.9%	1,127	1.3%	1,608	1.6%	998	163.7%
80 to 84	314	0.4%	549	0.6%	986	1.0%	672	213.9%
85+	304	0.4%	508	0.6%	854	0.8%	550	181.1%
Total	69,926	100%	86,658	100%	100,609	100%	30,683	43.9%

Table 11 - Gungahlin age profile 2016, 2021 & 2026

3.2.1.3 Molonglo (Cotter-Namadgi)

Age Group	2016		2021		2026		Change (#) between 2016 & 2026	Change (%) between 2016 & 2026
	Number	%	Number	%	Number	%		
0 to 4	531	9.7%	1,705	11.3%	3,387	11.7%	2,857	538.5%
5 to 9	274	5.0%	794	5.3%	1,685	5.8%	1,411	515.7%
10 to 14	232	4.3%	540	3.6%	1,084	3.7%	852	367.7%
15 to 19	194	3.6%	394	2.6%	785	2.7%	591	305.5%
20 to 24	716	13.1%	1,567	10.4%	2,731	9.4%	2,015	281.5%
25 to 29	1,064	19.5%	3,059	20.3%	5,439	18.7%	4,375	411.1%
30 to 34	833	15.3%	2,713	18.0%	5,153	17.7%	4,320	518.6%
35 to 39	437	8.0%	1,557	10.3%	3,321	11.4%	2,884	659.9%
40 to 44	360	6.6%	877	5.8%	1,868	6.4%	1,508	418.3%
45 to 49	346	6.4%	815	5.4%	1,514	5.2%	1,168	337.1%
50 to 54	147	2.7%	345	2.3%	680	2.3%	533	363.5%
55 to 59	72	1.3%	139	0.9%	279	1.0%	207	288.1%
60 to 64	44	0.8%	93	0.6%	169	0.6%	125	286.7%
65 to 69	43	0.8%	83	0.5%	156	0.5%	114	267.5%
70 to 74	25	0.5%	68	0.5%	133	0.5%	108	440.1%
75 to 79	33	0.6%	63	0.4%	142	0.5%	109	332.5%
80 to 84	24	0.4%	58	0.4%	130	0.4%	106	440.1%
85+	76	1.4%	228	1.5%	419	1.4%	343	452.5%
Total	5,448	100%	15,097	100%	29,074	100%	23,626	433.7%

Table 12 - Molonglo (Cotter-Namadgi) age profile 2016, 2021 & 2026

3.2.1.4 North Canberra

Age Group	2016		2021		2026		Change (#) between 2016 & 2026	Change (%) between 2016 & 2026
	Number	%	Number	%	Number	%		
0 to 4	2,480	4.6%	2,779	4.6%	2,832	4.3%	352	14.2%
5 to 9	2,205	4.1%	2,558	4.3%	2,912	4.4%	707	32.1%
10 to 14	2,094	3.9%	2,516	4.2%	2,982	4.6%	888	42.4%
15 to 19	3,386	6.2%	3,968	6.6%	4,659	7.1%	1,273	37.6%
20 to 24	7,596	14.0%	8,348	13.9%	8,933	13.6%	1,337	17.6%
25 to 29	7,134	13.1%	6,741	11.3%	6,513	9.9%	-621	-8.7%
30 to 34	5,166	9.5%	5,361	9.0%	4,918	7.5%	-248	-4.8%
35 to 39	3,841	7.1%	4,479	7.5%	4,783	7.3%	942	24.5%
40 to 44	3,320	6.1%	3,694	6.2%	4,496	6.9%	1,176	35.4%
45 to 49	3,175	5.8%	3,477	5.8%	3,874	5.9%	699	22.0%
50 to 54	2,976	5.5%	3,478	5.8%	3,940	6.0%	964	32.4%
55 to 59	2,783	5.1%	2,993	5.0%	3,550	5.4%	767	27.6%
60 to 64	2,183	4.0%	2,652	4.4%	2,910	4.4%	727	33.3%
65 to 69	1,853	3.4%	2,077	3.5%	2,566	3.9%	713	38.5%
70 to 74	1,297	2.4%	1,716	2.9%	1,949	3.0%	652	50.3%
75 to 79	1,030	1.9%	1,225	2.0%	1,620	2.5%	590	57.3%
80 to 84	868	1.6%	872	1.5%	1,070	1.6%	202	23.3%
85+	963	1.8%	932	1.6%	966	1.5%	3	0.3%
Total	54,350	100%	59,866	100%	65,473	100%	11,123	20.5%

Table 13 - North Canberra age profile 2016, 2021 & 2026

3.2.1.5 South Canberra

Age Group	2016		2021		2026		Change (#) between 2016 & 2026	Change (%) between 2016 & 2026
	Number	%	Number	%	Number	%		
0 to 4	1,249	4.7%	1,227	4.4%	1,172	4.0%	-77	-6.2%
5 to 9	1,372	5.2%	1,443	5.2%	1,508	5.1%	136	9.9%
10 to 14	1,487	5.6%	1,655	5.9%	1,749	5.9%	262	17.6%
15 to 19	1,523	5.8%	1,668	6.0%	1,841	6.2%	318	20.9%
20 to 24	1,487	5.6%	1,522	5.4%	1,547	5.2%	60	4.0%
25 to 29	2,454	9.3%	2,158	7.7%	1,944	6.6%	-510	-20.8%
30 to 34	1,951	7.4%	1,912	6.8%	1,671	5.7%	-280	-14.4%
35 to 39	1,594	6.0%	1,779	6.4%	1,811	6.1%	217	13.6%
40 to 44	1,955	7.4%	2,010	7.2%	2,293	7.8%	338	17.3%
45 to 49	1,864	7.1%	2,033	7.3%	2,093	7.1%	229	12.3%
50 to 54	1,979	7.5%	2,132	7.6%	2,331	7.9%	352	17.8%
55 to 59	1,932	7.3%	2,077	7.4%	2,292	7.8%	360	18.6%
60 to 64	1,562	5.9%	1,795	6.4%	1,931	6.5%	369	23.6%
65 to 69	1,365	5.2%	1,421	5.1%	1,635	5.5%	270	19.8%
70 to 74	881	3.3%	1,199	4.3%	1,262	4.3%	381	43.2%
75 to 79	638	2.4%	807	2.9%	1,121	3.8%	483	75.7%
80 to 84	469	1.8%	535	1.9%	722	2.4%	253	53.9%
85+	663	2.5%	578	2.1%	615	2.1%	-48	-7.2%
Total	26,425	100%	27,951	100%	29,538	100%	3,113	11.8%

Table 14 - South Canberra age profile 2016, 2021 & 2026

3.2.1.6 Tuggeranong

Age Group	2016		2021		2026		Change (#) between 2016 & 2026	Change (%) between 2016 & 2026
	Number	%	Number	%	Number	%		
0 to 4	5,814	6.8%	5,193	6.3%	4,249	5.4%	-1,565	-26.9%
5 to 9	5,617	6.6%	5,509	6.7%	5,064	6.5%	-553	-9.8%
10 to 14	5,343	6.3%	5,397	6.6%	5,302	6.8%	-41	-0.8%
15 to 19	5,980	7.0%	5,324	6.5%	5,399	6.9%	-581	-9.7%
20 to 24	5,496	6.5%	4,703	5.7%	4,048	5.2%	-1,448	-26.3%
25 to 29	5,557	6.5%	4,123	5.0%	3,186	4.1%	-2,371	-42.7%
30 to 34	5,836	6.9%	4,901	6.0%	3,588	4.6%	-2,248	-38.5%
35 to 39	5,470	6.4%	5,366	6.5%	4,556	5.8%	-914	-16.7%
40 to 44	5,876	6.9%	5,408	6.6%	5,396	6.9%	-480	-8.2%
45 to 49	6,156	7.2%	5,734	7.0%	5,278	6.8%	-878	-14.3%
50 to 54	6,490	7.6%	5,894	7.2%	5,583	7.1%	-907	-14.0%
55 to 59	6,165	7.2%	5,803	7.1%	5,409	6.9%	-756	-12.3%
60 to 64	5,288	6.2%	5,500	6.7%	5,224	6.7%	-64	-1.2%
65 to 69	4,058	4.8%	4,667	5.7%	4,907	6.3%	849	20.9%
70 to 74	2,497	2.9%	3,723	4.5%	4,229	5.4%	1,732	69.4%
75 to 79	1,580	1.9%	2,291	2.8%	3,405	4.4%	1,825	115.5%
80 to 84	1,044	1.2%	1,428	1.7%	2,013	2.6%	969	92.8%
85+	871	1.0%	1,045	1.3%	1,308	1.7%	437	50.2%
Total	85,138	100%	82,009	100%	78,144	100%	-6,994	-8.2%

Table 15 - Tuggeranong age profile 2016, 2021 & 2026

3.2.1.7 Weston Creek & Woden Valley

Age Group	2016		2021		2026		Change (#) between 2016 & 2026	Change (%) between 2016 & 2026
	Number	%	Number	%	Number	%		
0 to 4	3,404	6.0%	3,041	5.5%	2,696	5.0%	-708	-20.8%
5 to 9	3,655	6.5%	3,574	6.5%	3,448	6.4%	-207	-5.7%
10 to 14	3,437	6.1%	3,627	6.6%	3,613	6.7%	176	5.1%
15 to 19	3,378	6.0%	3,448	6.3%	3,652	6.8%	274	8.1%
20 to 24	2,945	5.2%	2,809	5.1%	2,681	5.0%	-264	-9.0%
25 to 29	3,285	5.8%	2,538	4.6%	2,170	4.0%	-1,115	-33.9%
30 to 34	3,362	5.9%	2,832	5.2%	2,292	4.3%	-1,070	-31.8%
35 to 39	3,769	6.7%	3,617	6.6%	3,312	6.2%	-457	-12.1%
40 to 44	4,138	7.3%	3,783	6.9%	3,875	7.2%	-263	-6.4%
45 to 49	4,131	7.3%	4,068	7.4%	3,829	7.1%	-302	-7.3%
50 to 54	3,752	6.6%	3,881	7.1%	3,919	7.3%	167	4.5%
55 to 59	3,417	6.0%	3,275	6.0%	3,449	6.4%	32	0.9%
60 to 64	2,843	5.0%	3,012	5.5%	2,941	5.5%	98	3.4%
65 to 69	3,018	5.3%	2,500	4.6%	2,679	5.0%	-339	-11.2%
70 to 74	2,763	4.9%	2,753	5.0%	2,332	4.4%	-431	-15.6%
75 to 79	2,229	3.9%	2,518	4.6%	2,600	4.9%	371	16.6%
80 to 84	1,478	2.6%	1,842	3.4%	2,136	4.0%	658	44.5%
85+	1,535	2.7%	1,699	3.1%	1,959	3.7%	424	27.6%
Total	56,539	100%	54,817	100%	53,583	100%	-2,956	-5.2%

Table 16 - Weston Creek & Woden Valley age profile 2016, 2021 & 2026

3.2.2.1 Belconnen Gender Analysis Tennis ACT Membership

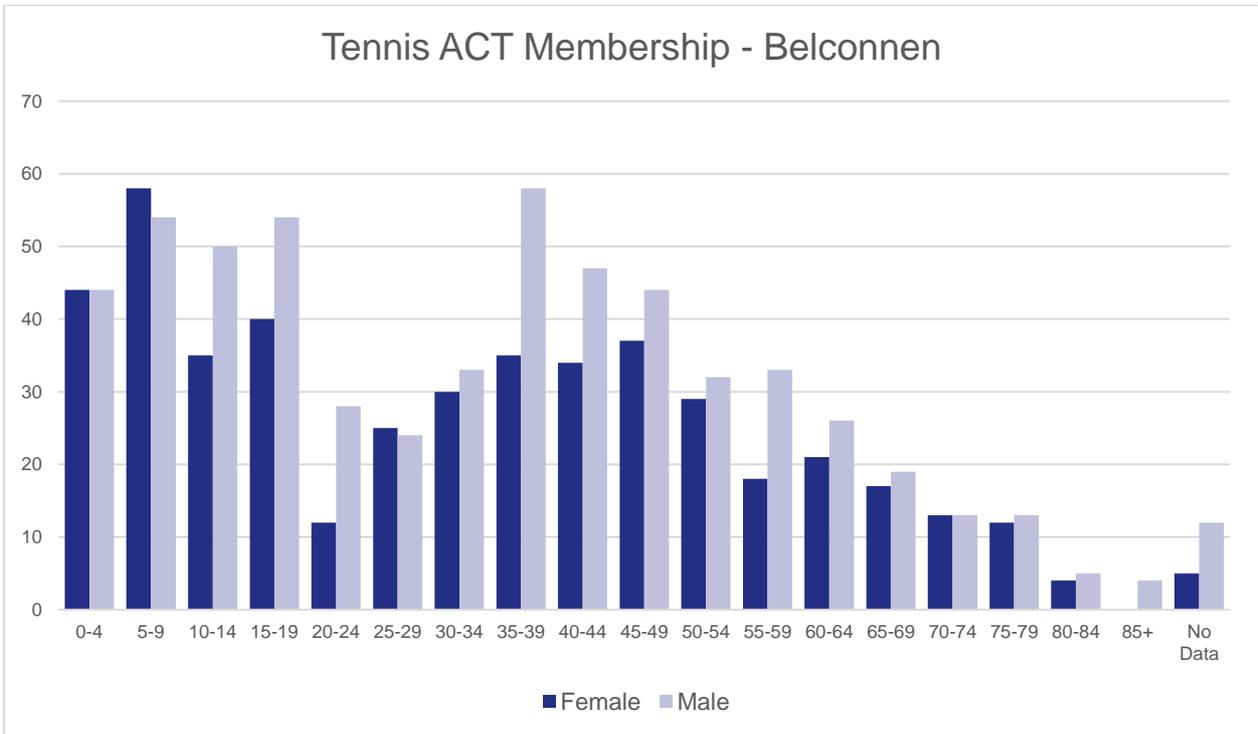


Figure 17 – Belconnen gender analysis Tennis ACT Membership

3.2.2.2 Gungahlin Gender Analysis Tennis ACT Membership

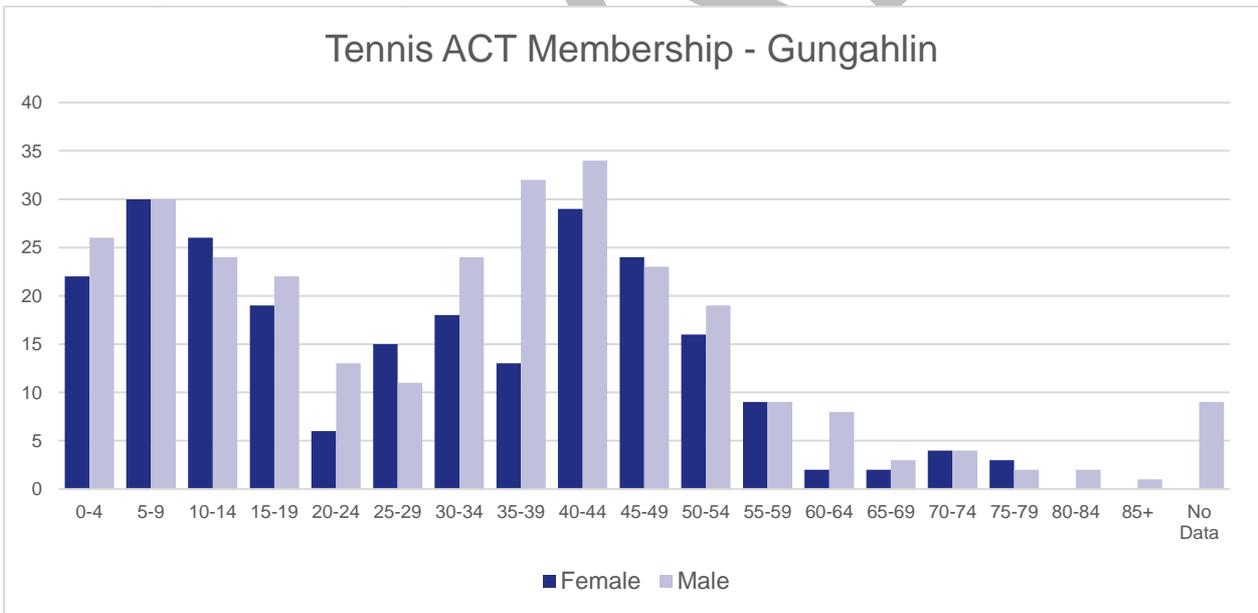


Figure 18 – Gungahlin gender analysis Tennis ACT Membership

3.2.2.3 Molonglo (Cotter-Namadgi) Gender Analysis Tennis ACT Membership

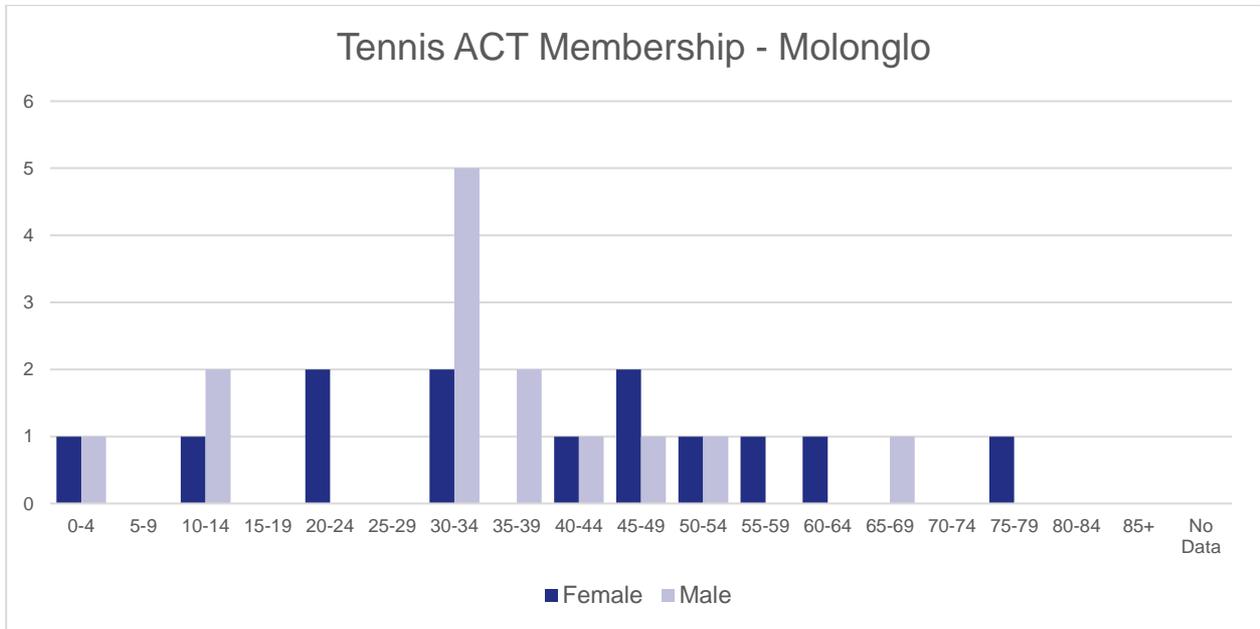


Figure 19 – Molonglo (Cotter-Namadgi) gender analysis Tennis ACT membership

3.2.2.4 North Canberra Gender Analysis Tennis ACT Membership

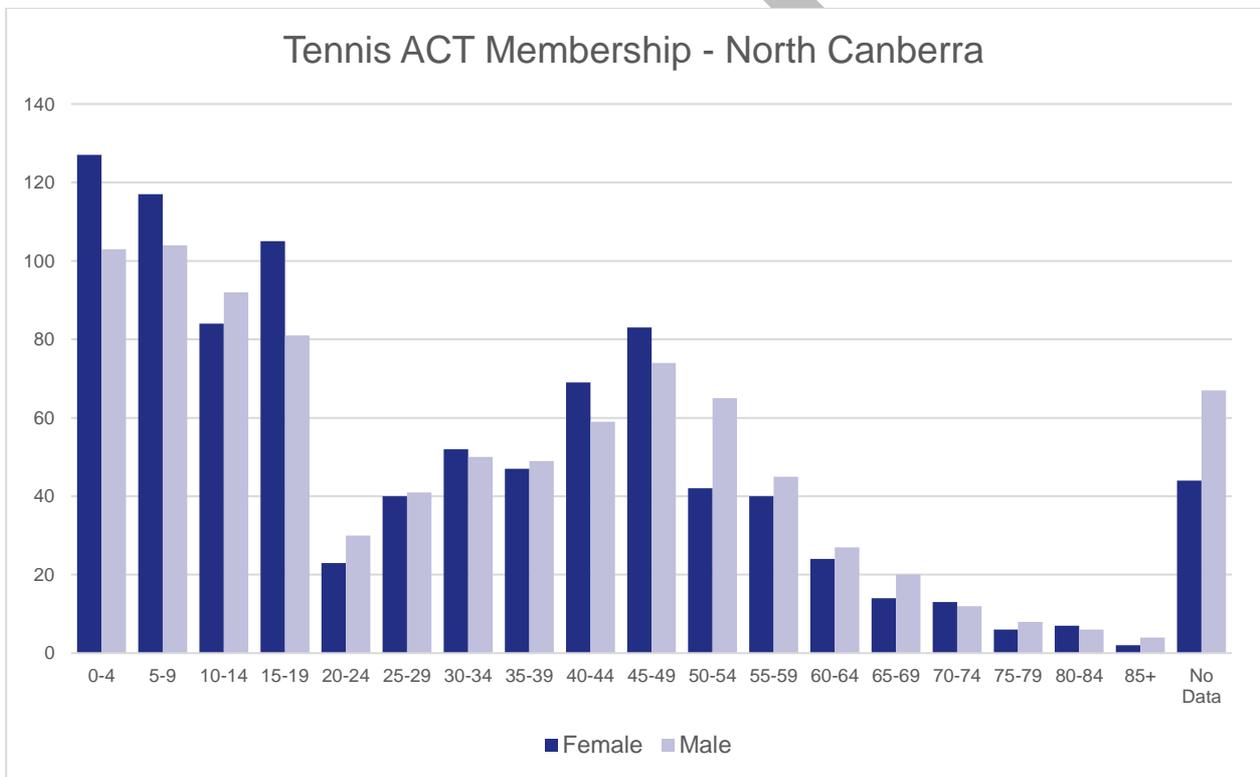


Figure 20 – North Canberra gender analysis Tennis ACT membership

3.2.2.5 South Canberra Gender Analysis Tennis ACT Membership

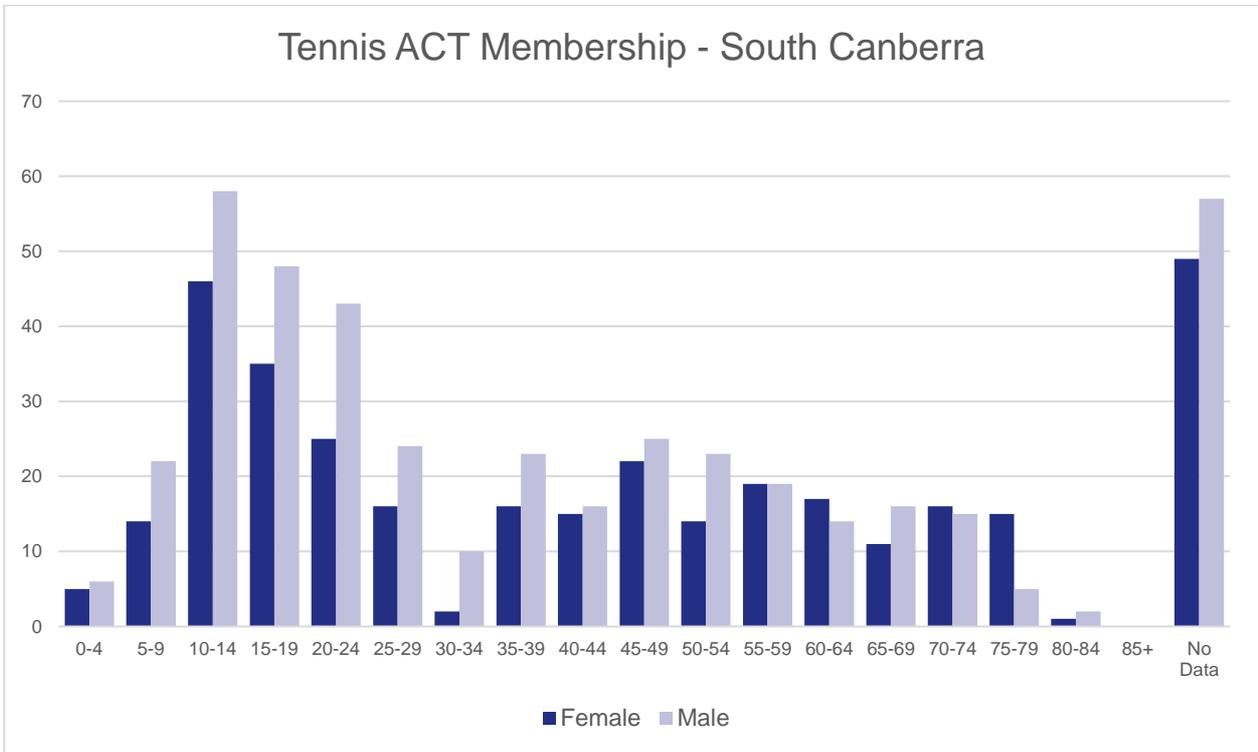


Figure 21 – South Canberra gender analysis Tennis ACT membership

3.2.2.6 Tuggeranong Gender Analysis Tennis ACT Membership

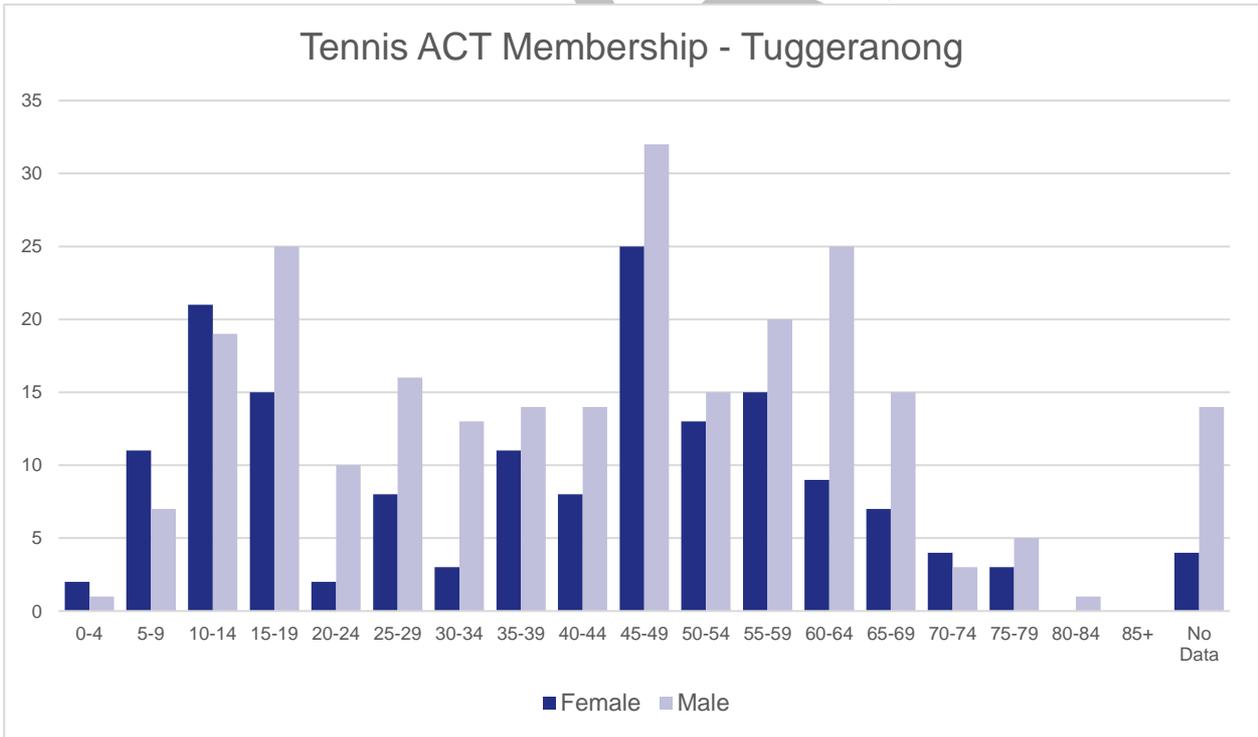


Figure 22 – Tuggeranong gender analysis Tennis ACT membership

3.2.2.7 Weston Creek & Woden Valley Tennis ACT Membership

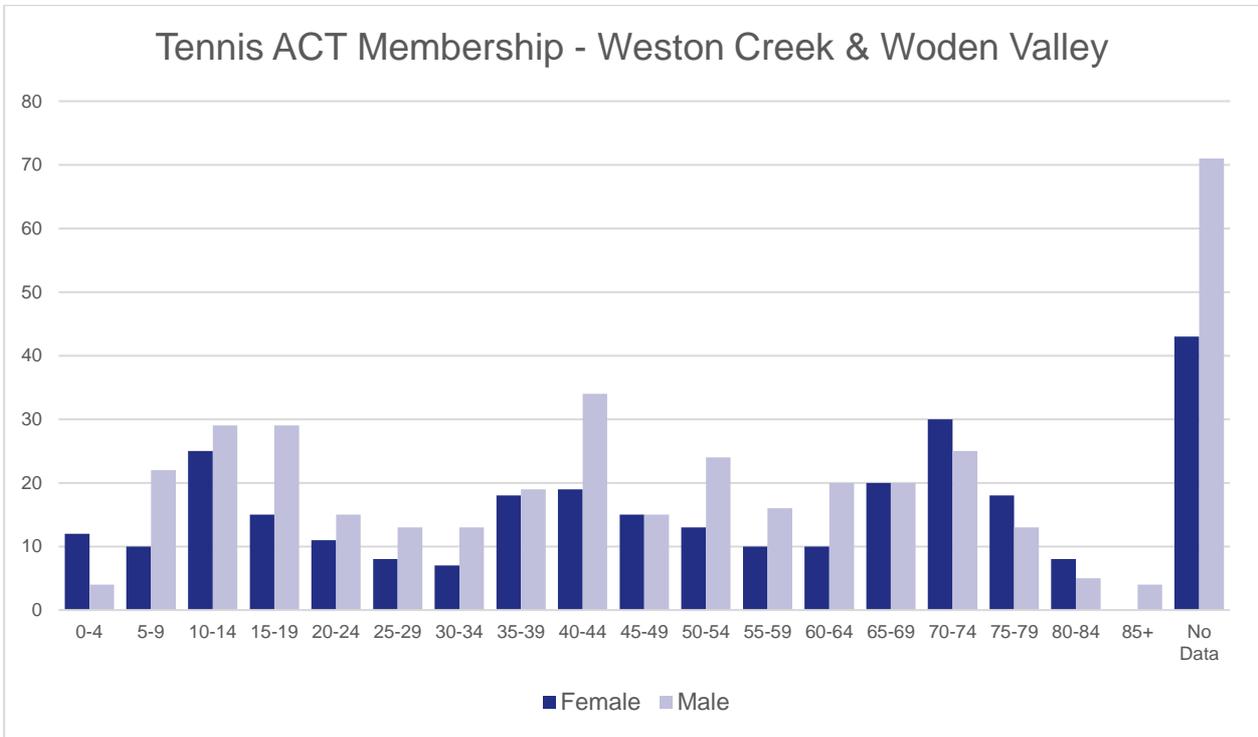


Figure 23 – Weston Creek & Woden Valley gender analysis Tennis ACT membership

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Attachment 3 – Active2020 Strategic Plan comments

The Active 2020 – A Strategic Plan for Sport and Active Recreation in the ACT & Region 2011-2020 identifies the following strategic priorities:

1. Maximise Community Engagement

Objective – Maximise community engagement (participation) in sport and active recreation

Expected Outcome – A more active community with access to quality facilities and sport and recreation programs

Tennis ACT Comment: to maximise community engagement, it is important to have facilities near the population.

1.1 Develop user friendly templates for regular data collection to ensure planning is supported by research based decision making

1.2 Provide and promote opportunities across whole recreation-sport continuum based on researched need and assuring alignment with national sport and recreation outcomes

Tennis ACT Comment: the 2009, 2015 and this report provide evidence of the researched need and show alignment with the national sport and recreation outcomes

1.3 Maximise availability for facilities and inclusive programs for people to get physically active – Industry and Health

Tennis ACT Comment: for tennis to achieve this, there needs to be facilities close to the population, which is currently not the case in Gungahlin, West Belconnen, Tuggeranong and Molonglo

1.4 Embrace new and emerging sports and activities, as well as new versions of existing sports, based on demands of changing population demographics

1.5 Ensure programs support population groups including disability, youth, indigenous, women, ageing and cultural groups

Tennis ACT Comment: Tennis ACT delivers a range of inclusion programs but currently lacks the required geographic spread to make them easily accessible to the wider community

1.6 Engage with Education in providing formalised school sport and physical education, and actively promote links and pathways to community clubs – Industry, Active Canberra & Education

Tennis ACT Comment: for tennis to achieve this, there needs to be community clubs close to schools, which is currently not the case in Gungahlin, West Belconnen, Tuggeranong and Molonglo

1.7 Improve access to sport and recreation programs and facilities for spectators, supporters and people with disabilities – Industry, Active Canberra & Business

Tennis ACT Comment: for tennis to achieve this, there needs to be facilities close to the population

2. Promote the benefits

Objective – Greater promotion of the health, education and social benefits of sport and active recreation

Expected Outcome – Regular promotion of research based evidence of the benefits of sport and recreation on health, education and social inclusion; and the engagement of sport and recreation in cross sector planning

2.1 Promote the ACT as a 'healthy and active national capital'

Tennis ACT Comment: arguably, to be a 'healthy and active national capital' there should be an appropriate provision for popular sporting activities to the wider population, which is currently not the case for tennis

2.2 Gather regular research to promote the benefits of sport and recreation to health, wellbeing, education, social inclusion and community engagement

2.3 Promote workforce capability by engaging vocational sector in training, coach, official and administrator education, volunteer management, and coaching courses in high schools

2.4 Develop a parental education program to promote the benefits of sport and recreation

2.5 Promote workplace sporting and active recreation activities to develop health and wellbeing / physical activity in the workplace – Industry, Active Canberra, Health and Business

Tennis ACT Comment: to help tennis achieve this, there needs to be facilities close to the working population

2.6 Align planning of programs and activities with COAG early learning framework and the outside school hours care framework

2.7 Safeguard the integrity and ethics of sport and recreation

Tennis ACT Comment: Tennis Australia has made a significant investment in establishing an internal Integrity Unit to ensure they are safeguarding against the integrity and ethics of the sport of tennis

3. Increase organisational capacity

Objective – Increase the capacity and capability of sport and active recreation to provide quality opportunities in the ACT

Expected Outcome – Sport and recreation associations and community clubs are better managed and providing quality sustainable opportunities in the ACT

3.1 Assist sport and recreation association and community clubs to build their capacity through governance training, organisational planning and education of administrators

Tennis ACT Comment: Tennis Australia significantly supplements this through a number of templates, tools, resources and workshops to aid community clubs. In recent years, this has had a focus on venue sustainability.

3.2 Promote cross club cooperation and coordination to provide efficiencies in resources, facilities and administration

3.3 Provide effective integration of new technology to enhance the experience and broaden the appeal of sport and recreation

Tennis ACT Comment: Tennis Australia has several technological tools to aid the administration and access to participation, including online club membership, program sign-up and court booking

3.4 In line with the National Sports Volunteer Strategy, ensure a more structured approach to volunteer planning and support for clubs around recruitment, definition of roles and responsibilities, retention, costs of volunteering and engaging corporate volunteers

Same comment as 3.1

3.5 Encourage succession planning for coaches, official and administrators to ensure an ongoing supply and pathway

Tennis ACT Comment: Tennis Australia run specific programs for the recruitment and training of coaches and officials

3.6 Develop measures to keep sport and recreation sustainable and affordable

Tennis ACT Comment: community tennis clubs currently take almost full responsibility for their asset repair and maintenance, as well as donate a significant amount of volunteer hours to the operation and maintenance of these facilities. ACT Government should review these facilities being classified as 'commercial' in the rates category, particularly while the government is abolishing stamp duty and raising rates. This remodelling of government charges is making it more difficult for community tennis clubs to remain sustainable and make the sport affordable. See the recent paper which goes into further detail and offers solutions – "Sustainability & Investment In ACT Community Clubs"

3.7 Provide sport and recreation organisation with the skills and tools to develop diverse income streams

Tennis ACT Comment: Active Canberra have supported this priority with tennis through the funding support for the implementation of the 'Book a Court' program in the ACT. This has increased revenue from casual hire significantly and continues to see great growth..

4. Maximise individual success

Objective – Maximise opportunities for outstanding individual successes

Expected Outcome – Clear pathways, quality coaching and support services for talented athletes and coaches

4.1 Confirm the role of the ACT Academy of Sport as a key centre of excellence within the national system developing local and national athletes and coaches

4.2 Ensure ACT sport performance objectives are aligned with the national outcomes

4.3 Ensure ACT sports provide clear talent identification and development pathways for athletes and coaches

4.4 Develop strategic partnerships with universities and other tertiary institutions to form centres of excellence in sport such as the University of Canberra Sports Hub

4.5 Ensure access to quality facilities, sport science, education and support services for developing athletes and coaches

Tennis ACT Comment: for tennis to achieve this, there needs to be facilities close to the population

4.6 Promote Canberra as a quality training venue for international athletes

5. Sustainable team performances

Tennis ACT Comment: This is largely the remit of the national body, Tennis Australia that develops and resources the national strategy. However, Tennis ACT has supported this locally with great success considering players such as Nick Kyrgios, Annerly Poulos and Charlie Camus are representing at national level and enjoying international success.

5.1 Ensure a functional relationship between national league teams and ACT sports to support their performance pathway

5.2 Provide cutting edge coaching, sports science, technology and support services to national league teams

5.3 Strengthen existing ACT teams, competing in national league competitions to raise profile of Canberra and

provide a sustainable pathway for athletes

5.4 Facilitate a joint business approach between ACT national teams to promote efficiencies in marketing, ticketing and engaging supporter base

5.5 Extend talent identification to schools, and target coaches and officials and ensure those identified have a clear pathway

5.6 Promote strong strategic partnerships with the AIS, ASC, ANU, UC that ensure access to local athletes and coaches

5.7 Leverage the investment in infrastructure in and by major national league teams for use by local organisations

6. Promote a national sporting capital

Objective – Create Canberra’s image as the “National Sporting Capital”

Expected Outcome – Canberra seen as a premium sporting destination for major events, participation and recreation festivals, and conferences

6.1 Develop and promote the Canberra Sport and Recreation Brand and raise the profile of the sport and active recreation industry in the ACT and Region

Tennis ACT Comment: Tennis ACT has made a significant contribution to this initiative through the event content delivered at the newly redeveloped Canberra Tennis Centre

6.2 Ensure government’s continuing investment in major teams to secure them and leverage community building, sport development, city profiling and economic benefits

6.3 Promote ACT as a sporting destination for major events, conferences and development tours

Same comment as 6.1

6.4 Enhance established ACT sporting precincts including Lyneham, Bruce, Stromlo and Manuka

Tennis ACT Comment: Tennis ACT through its partnership with Next Generation Clubs Australia has significantly contributed to this initiative through the Private / Public Partnership for the redevelopment of the National Sports Club

6.5 Explore opportunities to provide niche products and shared multi-use facilities and services such as regional centres of excellences

Tennis ACT Comment: the Community Activity Hub management model proposed for Gungahlin supports this initiative through shared multi-use facilities and establishing itself as a regional centre of excellence

6.6 Engage Australian Capital Tourism in joint promotional campaigns and funding submissions that demonstrate a measurable financial return to gain support of Treasury

6.7 Ensure Canberra Centenary Celebrations in 2013 promote Canberra and raise the profile of the sport and recreation industry

6.8 Explore export opportunities to promote Canberra as a sporting, training and recreational tourism destination

6.9 Foster the development of ACT administrators ensuring their influence on boards of national organisations

7. Maximise supporting infrastructure

Objective – Provide sport and recreation facilities and supporting infrastructure that accommodate the demands of participants needs

Expected Outcome – Sport and recreation supported by a long term strategic facilities and resources plan.

Facilities include indoor, outdoor, playing and training venues, school facilities, parks and waterways

7.1 Develop a long term strategic facilities and resources plan to support the objectives of the ACTIVE 2020 Plan including enhanced established ACT sporting precincts such as Lyneham, Bruce, Stromlo and Manuka

Same comment as 6.4

7.2 Position Active Canberra to ensure the most appropriate alignment with the strategic direction and available resources

7.3 Identify and address environmental challenges and ensure the sport system adapts to environmental changes and is environmentally conscious and responsible

7.4 Promote greater creation and use of multi-sport and recreation community facilities (both indoor and outdoor) – sharing resources, management and accessibility – Industry, Active Canberra and Education

Tennis ACT Comment: tennis’ Community Activity Hub facility management model supports this initiative and is the model proposed for Gungahlin

7.5 Promote more partnering and sharing resources in program delivery, coordination and leadership

Same comment as 7.4

7.6 Promote multi use of school facilities and allow access for clubs – Industry, Active Canberra & Education

Tennis ACT Comment: tennis supports this approach and is pursuing specific instances in Gungahlin

and Tuggeranong that would benefit from this strategic initiative

7.7 Ensure coordination between the portfolios of tourism, education, planning, sport and recreation – Industry, Active Canberra, Business and Tourism

Tennis ACT Comment: tennis fully supports this approach and has demonstrated success with the Canberra Tennis Centre. This Active 2020 strategic initiative does not include the Health department, which tennis believes should also be engaged with planning in consideration of the preventive health benefits of sport and recreation

7.8 Enhance local and regional partnerships between the industry, licensed clubs, business, and government to develop more privately built and managed facilities

Same comment as 6.4

7.9 Ensure better integration and coordination of non-government provided sport and recreation assets and infrastructure with government provided assets

DRAFT



DRAFT TERRITORY PLAN & TUGGERANONG DISTRICT PLAN

Submission by Tuggeranong Community Council

The Tuggeranong Community Council (TCC) is an incorporated, voluntary, not for profit, non-political, community-based association operating within the Tuggeranong District of the Australian Capital Territory. The TCC is formally recognised as the peak community body representing the interests of the local residents and the communities within Tuggeranong Valley. We wish to express some of our concerns and opinion on the Draft Territory Plan and Draft Tuggeranong District Plan.

Draft Territory Plan

TCC acknowledges the major reform now being undertaken by the ACT Government and Planning Authority. This reform will result in significant changes to the process of Planning and its assessment in the ACT and while we can see the potential improvement in the system, like many in the community we represent, there are concerns that the changes will not have the desired outcomes we are expecting.

We believe that this results from two broad reasons. The first being that much of the supporting detail documents are not part of the formal Territory Plan and there is concern that the legal status and ability for the details to be enacted will be downgraded through appeals and lack of legal enforcement. The second is that much of the detail is still to be finalised and made public, resulting in our uncertainty that these details will meet the expectations proposed by Government intentions.

These details include:

- Technical Specifications
- Urban Design Guide
- Housing Design Guide
- Other Guides
- Guide to Community Consultation now mandated in the proposed Planning Act.
- Upgrade of the web site with improved public access and ease of use, leading to better transparency.

The resources required to complete the Planning Reform remain considerable and TCC implores all levels of Government to maintain this considerable input to complete the documents and ensure the link to the Territory Plan is solid and the outcomes for the ACT will be achieved.



The government also need to take into consideration:

- Ensuring placement of various facilities throughout Canberra to give access to all communities, e.g. swimming pools, basketball courts and other sporting and community facilities.
- Ensuring facilities in one District does not negatively affect the environment of others, such as waste facilities close to residential areas.
- Ensuring we have an adequate water supply for the projected significant increase in population.
- Retain the requirements in Variation 369 – Living infrastructure, in the Territory Plan.

Tuggeranong District Plan

TCC is concerned that the *Draft Tuggeranong District Planning Strategy* does not represent the Character of the District, in that Tuggeranong is an outer district 20 kms or more from the City Centre. It is suburban in nature and the open feel and view to surrounding bushland hills is its strong attraction. This is acknowledged on the first page of the Summary document setting out what residents value about Tuggeranong.

The Strategy document appears to be generic in nature and proposes the same Urbanisation for all of Canberra.

The first part of the Strategy includes projected population for all ACT Districts, with growth in Tuggeranong being modest with 3,000 new dwellings by 2046 and 4,800 by 2063. TCC observes that this will be an increase in population from 89,460 in 2021 to 100,700 by 2063, a figure the 2018 Planning Act said we would get to in 2041. This will take Tuggeranong back to the population at its peak.

The Strategy proposes that this increase will be achieved with 100% infill and no new greenfield areas. TCC supports this proposal and supports no expansion into new areas and in particular the Murrumbidgee River corridor.

The recently released population projections from ACT Treasury indicate that there will be practically no growth in the Tuggeranong District. TCC observations is that Tuggeranong is still growing and there is a demand for homes with the values offered by the Tuggeranong District. We believe that a modest growth should be included in the Planning Strategy and that further investigations and planning incorporate the ability to enhance the facilities of the Tuggeranong District to encourage sustainable growth while retaining Tuggeranong's character.

The four-page Summary Brochure of the Tuggeranong Strategy contains a *Draft Tuggeranong District Strategy Plan* showing the proposals for the Five Drivers in Tuggeranong. The Sustainable Neighbourhoods driver indicates a significant area outside of the Town Centre and Group Centres as *Future Investigation Areas*. While the areas seem larger than necessary the summary indicates that '*Further detailed analysis and modelling to identify future housing needs not able to be met by proposed, possible and potential change areas across the Tuggeranong District*'. The future investigation areas seem reasonable in the context of the need for further



analysis and refining of potential growth areas. The Plan is repeated in the Strategy document and appears in a similar form several times including Fig. 31 on pages 94, 95 which has a note added that 4,000 to 4,400 of the 4,800 dwellings can be provided in the future change areas, which are the Town Centre and Group Centres. Very little growth would then be required outside of the Town and Group Centres.

However, in Fig. 36, *Tuggeranong – Sustainable neighbourhoods*, on page 110, 111, setting out details for the *Sustainable Neighbourhoods Driver*, it appears the detailed analysis and modelling has been forgone and housing types have been determined for the full future investigation areas. This includes substantial high rise buildings remote from the Town and Group Centres. While theoretically, it might be possible to fit a significantly larger number of dwellings in the proposal on Fig. 36 including high rise of over 6 storey well away from any Centre, this would be inappropriate for the Tuggeranong District and from the analysis provides in the Strategy is unwarranted. Fig. 36 needs to be significantly amended to reflect the Plan as shown in the summary brochure and several times earlier in the Strategy, as well as reinforcing the need for further investigation, which would include Community Consultation and Engagement.

Appendix 1 of the Strategy sets out the Transect Characteristics. General Urban (T4) up to 3 Storey; Urban Centre (T5) up to 6 Storey; and Urban core (T6) high rise greater than 6 Storey, are proposed for the future investigation areas. T6 by definition is suitable in Urban Centres yet in the Tuggeranong District Plan, it is proposed several kilometres from any Centre. T6 is not appropriate or warranted in the Tuggeranong District with perhaps the exception of the Town Centre where any proposal should be of very high standard and in keeping with the views to the surrounding bushland hills. T5 type dwellings are more appropriate in the Town and Group Centres and considerable analysis and community consultation and engagement is necessary before adoption outside of the Centres.

The Tuggeranong District Implementation Plan's initiatives generally involve further analysis, modelling or other planning investigations. While the District Strategy would be acceptable with the above amendments there is a need for an immediate update to be undertaken to address much of the identified details in order for the District Plan to be of value in support of the Territory Plan. TCC requests that an update of the District Strategy be undertaken within one year with community consultation and engagement.

Strategic Movement to Support City Growth

The Strategy projects an increase in Active Transport and Public Transport across the ACT. While TCC is supportive of this approach the Strategy again appears to be generic in nature and suggests that what is appropriate for the City Centre and highly urbanized areas is also appropriate for the outer suburban district of Tuggeranong.

TCC notes that the average trips by car in the ACT is 76% of trips while Tuggeranong is significantly higher at 82%, reflecting the longer and divergent trips from the district.



The proposal to reduce dependency on travel by car is based on:

- Increasing public transport journey to work from 7.1% to 10 – 15%
- Increasing walking and cycling from 16.9% to 25 – 30%

Even if this was achieved for Tuggeranong, trips by car would still be the major form of travel. Note also, that the ACT government is promoting Electric cars. Generally, the trips by car would drop from 76% to 65 – 55%. Tuggeranong will possibly be several percentage points higher, possibly over 70% of trips by car in the future.

Additional incentives to further reduce car trips could result from an increase in local work opportunities such as the provision of hot desk facilities in Tuggeranong for ACT public servants and Australian government departments.

The Tuggeranong District Strategy needs to acknowledge that car travel will remain a major form of transport into the future and an efficient arterial road network is needed. Speeds on the arterial roads, currently 80kph, should be retained to allow for efficient travel by car to other Centres including the City Centre.

The parking requirements for development should also reflect the ongoing reliance on private car transport. Change to electric vehicles will also increase the need to have private parking with charging points in dwellings.

Appendix 2 seems to promote the conversion of roads into Urban Boulevards. The arterial road system in Tuggeranong generally has been developed along the major watercourses such that the road reserve incorporates significant floodways and wide buffer zones for noise abatement. Buildings generally do not front these corridors. TCC believes the arterial road corridors, including 'no building frontage' is part of the Tuggeranong Character and should be preserved. Encroachment into the floodways to develop Urban Boulevards is not appropriate, especially along Athllon Drive, which is a major arterial connection to Tuggeranong. Given the prediction of an increase of extreme climate events, reducing any floodway capacity is false economy and could adversely affect community safety.

The healthy waterway strategy which is included in the blue green strategy will require the floodway corridor to implement future improvements. Reduction of the floodway will limit the options for improvement of water quality in Lake Tuggeranong.

Future investigation of the appropriate road type for all Tuggeranong's major roads, using the Movement and Place approach, needs to be carried out, with full community consultation and engagement, before any significant change in road type is adopted.

Local Knowledge

Several potential errors have been identified in the various plans as follows.

Tuggeranong currently has two rapid transport routes, R4 and R5. The R4 currently terminates at Tuggeranong Town Centre interchange while various plans show it continuing south to Lanyon Market Place via Drakeford Drive. Clarification of the existing and proposed Rapid routes on the plans is needed.



While there is a comment about rapid transport from the Chisholm Group Centre there is no mention of rapid transport or improved connections to the Kambah area. Kambah is the largest suburb in the ACT and substantial growth is proposed in Kambah and the Group Centre. An effective rapid transport system to this suburb needs to be investigated in the short term.

All Rapid Transport Routes from Tuggeranong both existing and proposed from Kambah and Chisholm need to connect Tuggeranong to the City Centre for efficient and convenient travel.

The path network shown on various plans and particularly Fig. 32, *blue-green network*, do not seem to match the network as shown in the *ACT Transport Strategy 2020* and the *Active Travel Practitioners Toolbox* (activeinfrastructure.net.au). TCC is concerned that there is not consistency with other Government Strategies. There also appears to be some inaccuracies in Fig. 32 and other plans. A marked up copy of Fig. 32 is appended with comments.

An off-road path from Chisholm, via the Monaro Highway linking Chisholm to the City as well as Hume and Fyshwick is an Active Travel link that is important for Tuggeranong. A feasibility study has been undertaken by the ACT Government and provision for the path is to be provided in the proposed upgrades to the Monaro Highway. This path should be identified in Tuggeranong and other District Strategies.

Tuggeranong experiences an inversion layer in the atmosphere which is of concern for air pollution for residential areas. Any proposals for the Possible Change Area identified for Hume and the East Canberra District Strategy needs to take the air quality in the Tuggeranong District into account.

Heritage

Tuggeranong Homestead is a nationally significant heritage facility; however, it is included in the Key Sites and Change area at Calwell Group Centre. Residential Development in the Homestead and surrounding open space is not appropriate and definitely should not be considered as a change area.

Recommendations

TCC offers the following Recommendations.

- Maintain a high level of resourcing to finalise all documents and ensure the supporting documents have strong links to the Territory Plan and cannot be ignored by proponents of development.
- That a modest potential growth of the Tuggeranong District be included in future planning modelling.
- Fig. 36, *Tuggeranong – Sustainable neighbourhoods*, be amended to reflect that housing types have not been determined and reinforce that further detailed analysis will be carried out, with full community consultation and engagement, to determine the appropriate development and growth for the Tuggeranong District. i.e. no high rise on unsuitable places like all along Athllon Drive.



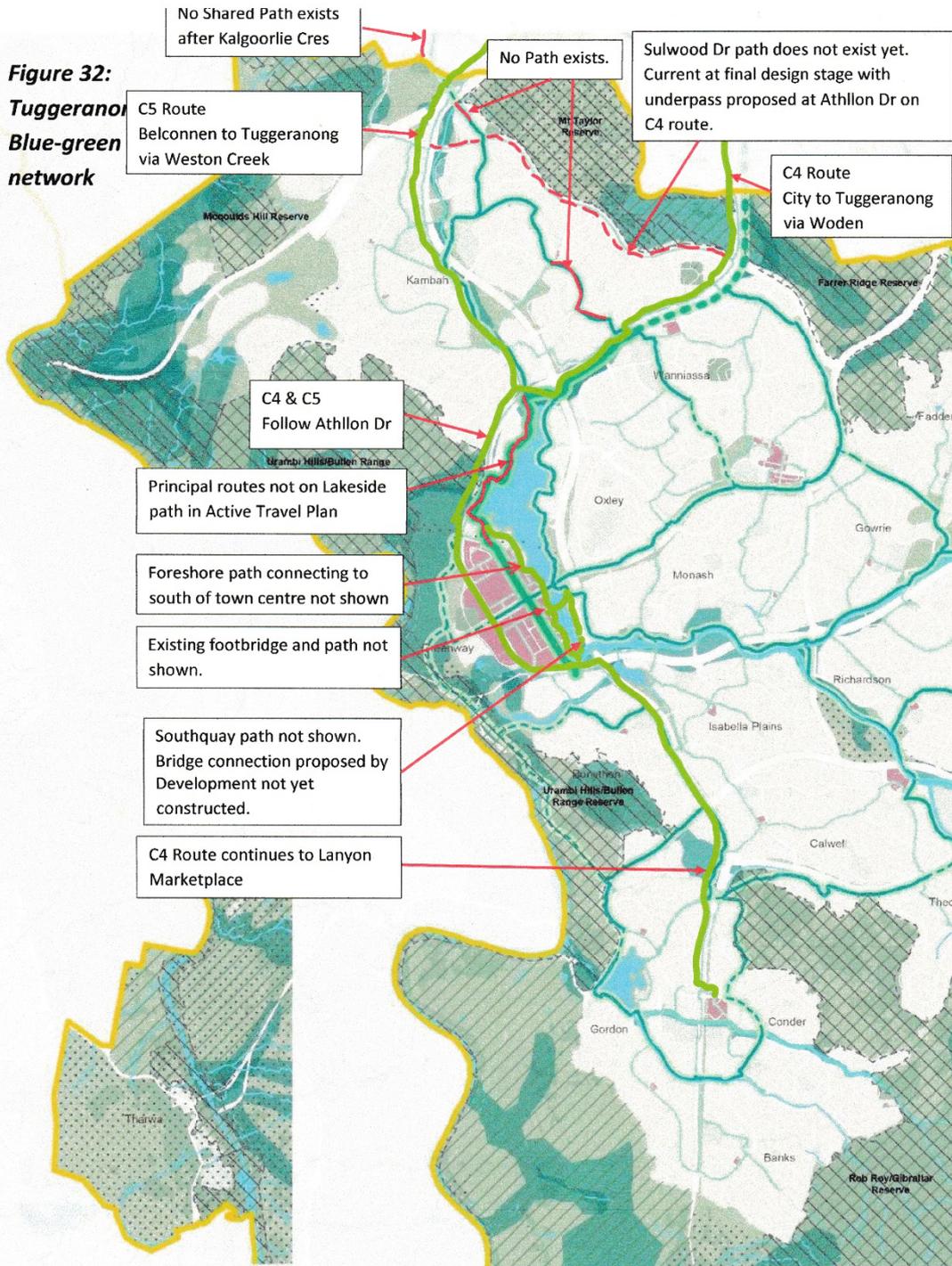
- Update the Tuggeranong District Strategy within one year with community consultation and engagement.
- Investigation of Tuggeranong's major road network be carried out, with full community consultation and engagement, using the methods outlined in the Transport Strategy of Movement and Place and Vision Zero to provide an effective road network for all transport types including the significant private car trips, which will be generated in Tuggeranong into the future.
- Investigate improved public transport connections to Kambah and Chisholm including Rapid Transport options.
- The Tuggeranong Homestead and surrounds be removed from a Key Change Area and retained as a significant heritage facility.
- Investigate opportunities for locally based work such as hot desk facilities for ACT public servants to reduce commuting trips to other Centres.
- Amend Fig 32, *Tuggeranong – Blue-green network*, to show intended path system accurately.

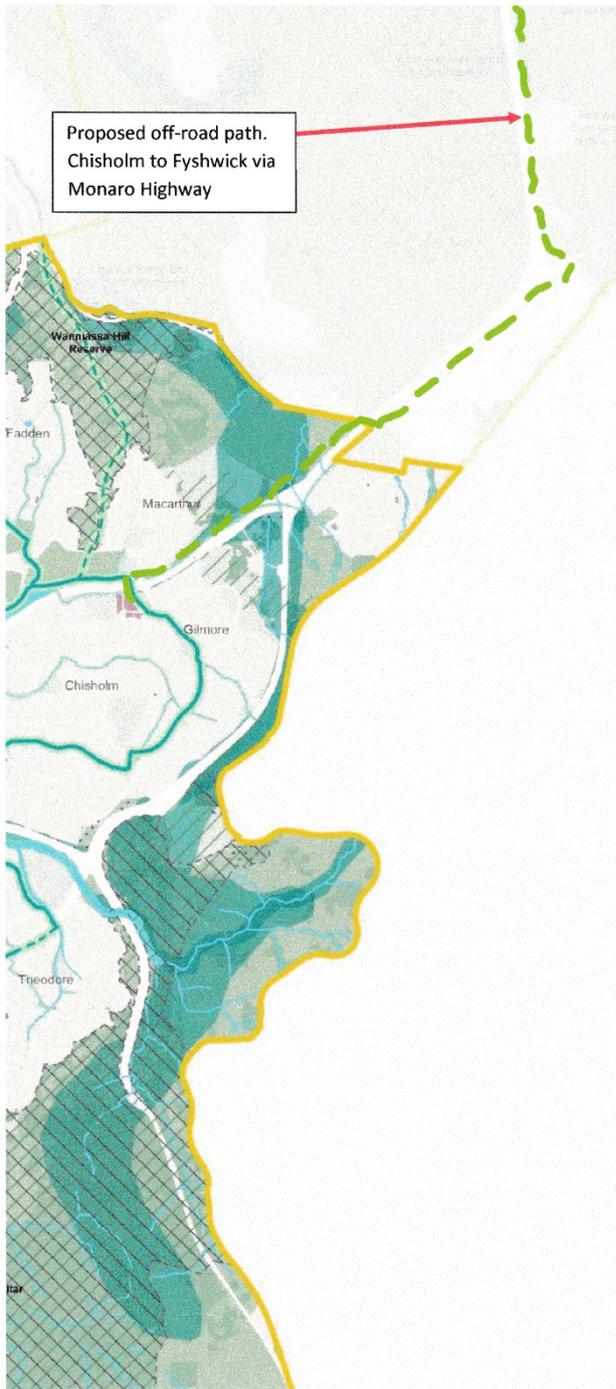
TCC is hopeful that the reforms to the planning system will result in the expectations for future planning outcomes for Canberra being achieved, including a transparent and effective community consultation and engagement process.

We look forward to the release of the updated Documents with a feedback report and register of submissions.

Thank you for the opportunity to submit our concerns with the draft Territory Plan and Tuggeranong District Plan.

[Redacted Signature]
President
Tuggeranong Community Council





LEGEND

Note: This is a common legend for all similar district plans and all items listed will appear on this drawing

-  District Boundary
-  Open Space with 5m Contours
-  City/Town/Group/Local Centres
-  Water Bodies
-  Creek Lines

Conservation Connectivity

-  Protected Flora and Fauna
-  Potential Priority Connectivity Areas
-  Riparian Corridors
-  Heritage
-  Potential Habitat Area
-  Conservation Area
-  Nature Reserve

Blue Green Network

- Existing Connections
 -  Primary
 -  Secondary
 -  Tertiary
- Possible Future Connections
 -  Primary
 -  Secondary

Scale at A4 1:50000





**SUBMISSION TO THE ACT PLANNING SYSTEM REVIEW AND REFORM PROJECT,
DRAFT GUNGAHLIN DISTRICT STRATEGY**

THE VILLAGE OF HALL AND DISTRICT PROGRESS ASSOCIATION

Village of Hall and District Progress Association
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President: [REDACTED]

**SUBMISSION TO THE ACT PLANNING SYSTEM REVIEW AND REFORM PROJECT, DRAFT
GUNGALIN DISTRICT STRATEGY
FROM THE VILLAGE OF HALL AND DISTRICT PROGRESS ASSOCIATION**

THE VILLAGE OF HALL AND DISTRICT PROGRESS ASSOCIATION

The Village of Hall and District Progress Association (VHDPA) is an incorporated, not-for-profit community association which promotes the interests of Hall Village and District community members. The objects and purposes of the Association are to further the interest and welfare of the community of the Village of Hall and District, to protect and progress the amenity and heritage character of the Village of Hall and, to facilitate the recreational, educational, environmental, heritage, artistic, occupational and other interests of members and residents of Hall Village and District.

The VHDPA is the Australian Capital Territory's oldest community association and represents a community that appreciates the Ngambri-Ngunnawal, historic and natural heritage values of its surrounding environment.

HALL VILLAGE

Hall Village was set out in 1881, while Gungahlin's modern development began 110 years later. This particular "village urban character" has been enshrined for protection in the VHDPA constitution, and the village has been recognised in the ACT Heritage Places Register since 2001.

In the Hall Village Master Plan dated May 2001 (number 20011438) then Minister for Planning, Simon Corbell, wrote that Hall is a special place that is valued by both its residents and the broad ACT community. To its local residents Hall provides a special ambience and village lifestyle. To the broad ACT community it provides a tangible link to the region's history.

Minister Corbell further noted that the Hall Village Master Plan recognised Hall as a discrete village, and established principles to protect its distinctive qualities by creating a rural buffer to any future development and providing a set of development control guidelines that respond to the natural and cultural identity of the area.

The VHDPA recognises that for the purposes of administration and service delivery within the ACT government, Hall will be attached to a larger "district" in the ACT. Nevertheless, when considering matters of planning, environment, character, watershed, heritage, conservation and recreation, Hall Village is an unique community and cannot be appropriately compared with, or incorporated in, any other district within the ACT.

Because of the uniqueness of Hall Village, the VHDPA recommends that the Gungahlin District Strategy include specific and unambiguous reference to this uniqueness. The Gungahlin District Strategy should specifically enshrine the provisions of the Hall Village Master Plan and the Hall Precinct Code 2013 (NI2008-27).

GUNGAHLIN DISTRICT STRATEGY 5 BIG DRIVERS

The draft ACT Planning District Strategies 2022 identify “5 Big Drivers”. The VHDP has the following comments and recommendations on the Gungahlin District Strategy under the framework of the 5 Big Drivers.

Blue-Green Network

Hall Village has an unique position with respect to restoring and protecting nature reserves and the network of natural corridors, where conservation values can be protected, to contribute to a living blue-green network. The Hall Village Buffers as identified in the Hall Village Master Plan include the Kinlyside Reserve, Gold Creek Rural Lease, the Nature Park areas to the East, agistment and agricultural areas to the West, the Hall Showground, Polocrosse ground, sports fields, playground and nature area surrounding Halls Creek. These Blue-Green areas are key watershed and habitat for a range of rare or endangered species of flora and fauna including the Golden Sun Moth, Gang-Gang Cockatoo and remnant patches of Yellow Box/ Red Gum grassy woodland known to be associated with the Superb Parrot, Hooded Robin, Brown Tree Creeper, Swift Parrot, Regent Honeyeater. The Hall Cemetery includes the habitat of the endangered Leek Orchid.

The protected Aboriginal sites within the grassy woodland and along Hall’s Creek demonstrate a relative lack of physical disturbance within these areas, and reflect a natural and Aboriginal cultural landscape prior to European settlement.

In order to advance the Blue-Green Network of the Gungahlin District Strategy, the VHDP recommends:

The Boundaries and Buffers as specified in the Hall Village Master Plan be explicitly included in the Gungahlin District Strategy and further development excluded from all Boundary and Buffer areas including the current conservation areas and agricultural leases.

Establishment of storm water drainage infrastructure in Hall Village to address current and future needs, cognisant of the increasing frequency and severity of storm events resulting from global climate change and consistent with the parameters of the Hall Master Plan and the Hall Precinct Code. This will make a significant contribution to water shed management within the Blue-Green Network.

Maintain the linkage of Kinlyside Reserve with the agricultural lease of Gold Creek Station for the ongoing conservation and protection of the Golden Sun Moth, Gang-Gang Cockatoo and remnant patches of Yellow Box/ Red Gum grassy woodland. This will enable the maintenance of the connectivity corridors from Halls Creek to Kinlyside Reserve and beyond.

Economic Access and Opportunity Across the City

There are numerous small businesses located in Hall Village. These currently include five hospitality businesses (three cafes, a licensed restaurant/ bar and a function centre set in an agricultural environment), motor mechanic, technology and engineering consultants, retail premises (jewellery, novelty, two hairdressers, accountant, beauty therapy, stock feeds), photographer, electricians, carpenters, plumbers, landscapers, veterinary clinic, medical centre and individual consultants in environment, heritage, education and international development, and others.

The unique rural heritage character of Hall Village, its position as a track head on the Centenary Trail, the Hall School Museum and Heritage Centre and the presence of eight locations of Canberra Tracks heritage signage in the Village, the Pony Club, Polocrosse, Axe Men's Club and monthly Hall Markets continue to attract local, interstate and international visitors.

Small business and sole-traders in Hall Village represent a meaningful contribution to the economic Access and Opportunity target of more jobs accessible to home. The attraction of visitors further contributes to economic activity of the ACT. In order to support small business activity in Hall Village, the VHDPa makes the following recommendations.

The VHDPa recommends a review of the current Commercial Rates that are applied in Hall Village present a substantial disincentive to further development of small business in the Hall Village commercial area of Victoria Street.

Although not directly part of the ACT planning system, the current state of internet broadband service in Hall Village presents an impediment to the viability of small business economic activity. The existing "fibre-to-the-node" and dated node-to-premises wire connections result in poor continuity of service and slow internet speeds. Businesses regularly face internet outages, affecting productivity and turnover. Similarly, mobile 'phone signal is also extremely weak, in spite of the towers in Kinlyside and One Tree Hill. This also results in the uselessness of "smart modems" that cannot function due to the strength of the mobile signal. The VHDPa recommends that priority be given to improved telecommunications in Hall Village include "fibre-to-the-premises" and addressing the ineffective mobile 'phone signal.

Strategic Movement

In 2019, a very rudimentary walking and cycle track was scaped alongside Victoria Street but has never been suitable for anything other than mountain bikes and is unusable by other cyclists or casual walkers. Despite the best efforts of ACT government staff responsible for track maintenance, this track continues to deteriorate and recently even those riding mountain bikes are avoiding the eroded track with where culvert covers are also damaged and dangerous. Numerous cyclists and walkers continue to travel on the road along Victoria Street between Hall Village and the formed cycle and pedestrian path at Clarrie Hermes Drive. Victoria St is narrow, has no formed shoulder and very rough edges. The VHDPa has been advised that construction of a fully formed and sealed cycle/ pedestrian path has been placed on a priority listing for future works but it has not been identified as an immediate priority.

Currently, the only public transport serving Hall Village is CDC Transport (formerly QCity, Deanes, Transborder) providing school bus services connecting NSW communities to schools in the ACT using Hall Village as an interchange. This is also one morning public service by CDC from Yass via Hall to Belconnen and an on-request service through Hall to Yass in the afternoon.

In order to achieve the targets of reducing car dependence and increasing active transport, the VHDPa makes the following recommendations.

The VHDPA recommends that the construction of a fully formed cycle/ pedestrian path from Gladstone St Hall to Clarrie Hermes Drive be undertaken as an immediate priority to establish active travel links between Hall Village and Casey, Nicholls and Spence and reduce the current road safety risks. In the interim it is important to maintain and stabilise the current scraped strip that requires regular maintenance and is only suited to Mountain Bike riders (except when torrential rain excludes them).

While enhancing public transport network connections within Gungahlin District and between Gungahlin and other districts, a regular ACT public bus service be established to service Hall Village.

Sustainable Neighbourhoods

The Indigenous history of Hall stretches thousands of years as evidenced in the Protected Aboriginal Sites along Halls Creek. The European settlement of Hall Village dates from gazetting of the community in 1882. Over the last 140 years, Hall Village has evolved into the vibrant community that exists today where residents, businesses and visitors enjoy the unique rural environment, parks, sports grounds, equestrian facilities and walking trails.

To protect and enhance Hall Village to be enjoyed by residents and the wider ACT community, the VHDPA recommends that the Gungahlin District Strategy should specifically enshrine the provisions of the Hall Village Master Plan dated May 2001 (number 20011438) and the Hall Precinct Code 2013 (NI2008-27).

Inclusive Centres and Communities

Hall Village makes a distinctive contribution to activities that enhance the well-being of the ACT Community. The monthly Hall Markets, annual National Sheep Dog Trials, host to Sri Chinmoy races, equestrian activities, men's and women's Rugby Union, woodchopping, Men's Shed, Museum and Heritage Centre, public accessible tennis courts and Centennial Trail provide a diverse range of recreational and sporting opportunities for all ages of the ACT community. A small children's playground and the aging play equipment at the former Hall Primary School site are much used by residents and visitors to Hall Village.

To further contribute to the Gungahlin District strategy target of Improved Community Wellbeing, the VHDPA makes the following recommendations.

ACT TCCS fully implement the improvements to the Gladstone St playground as outlined in the Hall Adventure Trail design (27 Sep 2019) as approved by Act Heritage (15 Oct 2019) to provide enhanced and varied play activities for children.

Restore the century-old heritage clay-surface tennis courts originally built in Hall in the 1920s. Although the Hall Men's Shed of the VHDPA has done some repairs and weed control on one of the two courts, the courts need further work beyond the means of the VHDPA to be fully restored.

Establish changing facilities for the sports ground (rugby field) that are consistent with the Hall Precinct Code, are sympathetic to the existing Hall Pavilion and barbeque shed in materials and form and comply with heritage requirements of the Aboriginal sites zone along the Halls Creek.

CONCLUSION

The Village of Hall and District Progress Association welcomes the development of the Gungahlin District Strategy while recognising that Hall Village remains an unique community and cannot be appropriately compared with or incorporated in any other district within the ACT.

The VHDPA considers that there a number of opportunities where modest action and investment in Hall Village will contribute significantly to the identified targets within the Gungahlin District Strategy while conserving Hall's distinctive environmental and heritage qualities.



DOWER COMMUNITY ASSOCIATION – SUBMISSION ON THE DRAFT INNER NORTH AND CITY DISTRICT STRATEGY (DISTRICT PLAN)

The Downer Community Association (DCA) was formed in 1985 (incorporated in 1987) to represent the interests of Downer residents on issues which affect our suburb and surrounding areas. These include local facilities, planning and traffic, development applications, changes to parks and streets, and issues which affect local communities.

The DCA does not support the District Plan in its current form, and makes the following key points below.

- **Downer is a unique suburb in the inner north, and requires a dedicated planning and development strategy**

Of 160 hectares of Downer, a significant proportion of Downer is already residential (as opposed to green and community space). Even before the more recent urban intensification push, Downer was the third most dense suburb in the inner north (after Turner and Braddon) comprising mostly residential dwellings. At the time of the construction of the suburb, 66 per cent of the houses in Downer were government owned and constructed, reflecting a tight design with small blocks and limited open space. This saved on land costs and resulted in a relatively high-density residential area than achieved elsewhere in the inner north. The roads are narrower than other inner north suburbs (7-meter span as opposed to 10 meter span) and many streets do not have footpaths. This reflects the deliberate and stated design intent of Mr Jack Venn, NCDC planner, at the time.

That is, the zoning and planning foundations of Downer are not the same as those of Turner and Braddon. The inner north District Plan fails to consider these distinguishable features of Downer from other inner north suburbs and applies a cookie-cutter approach towards urban development, which, if applied to Downer, will not deliver the intended outcomes. The foundations are different.

Downer requires its own dedicated planning and development strategy.

- **Further significant development in Downer is not required to meet Government urban intensification dwelling infill requirements**

The *City and Urban Gateway Renewal Strategy 2018* (the Gateway Strategy) had a stated aim to deliver 37,000 additional dwellings. The Gateway Strategy also facilitates up to six story buildings being erected on Northbourne Ave, and up to four storey buildings on the west side of Blacket, Atherton and Banfield Streets in Downer.

In a separate but related document, the *ACT Planning Strategy 2018*, identified that 70 per cent of urban development was to be within the existing urban footprint, targeting 800 metres within light rail stops. This had the effect of potentially capturing 80 per cent of Downer within its remit for urban infill/intensification.

Now Downer is faced with the *Draft Inner North and City District Planning Strategy* (the District Plan) having the stated aim of an additional 22,400 dwellings in the inner north over similar timeframes (per page 98).

The DCA notes that the infill required to additional dwellings (37,000 dwellings or 22,400 dwellings), is in large part already in train through the developments underway or in planning on greenfield and

brownfield sites on Northbourne Ave, Yowani, Kamberra Winery and Thoroughbred Park (race-course).

This means that intense urban infill in Downer is **not** required to meet Government infill targets. As noted above and for additional reasons elaborated upon further below, there are many inherent characteristics of Downer that make it unsuitable for intense infill.

Downer is experiencing population growth, as shown in the most recent census data (2021), with significant expansion in the younger and school age population, with the average age in Downer reducing (from 39 years, down now to around 34 years of age).

- **Downer has already made a significant contribution to the increased density of the inner north, and doesn't have the space and infrastructure to support more.**

Below is a potted history of various ACT Government planning and development strategies and 'initiatives' which have, and continue, to impact Downer.

In **1995** – medium density study for central Downer (Dwyer Leslie Study) – saw Downer increase its density at the former site of the John Curtin School of Medicine Laboratory, Appleby Court and Eulalia Court.

In **May 2002** – *DV 200* – being a variation to the Territory Plan, among other things, initially sought to add A10 zones (up to 80 per cent medium density zones) around the local Downer shops and the Dickson shops. However, this was subsequently reduced in Downer to 20 per cent medium density around the Downer shops, based on the fact that at the time there were no local shops in Downer.

There are limited no local shops in Downer.

In **August 2004** – *DV246 – Changes to Residential Area Specific Policy Overlays, Suburb of Downer* initially proposed increased density in the entire southern part of Downer to R2 (residential core, which included townhouses and flats). However, the final outcome was changed to reflect that only the section along Antill Street was rezoned to R3 (medium density), with the remainder 'de-zoned' to return to its suburban character. The reasons for the de-zoning are as relevant today as they were then, and were outlined in the ACT Government's own document at the time describing the reasons why Downer was not suitable increased density:

- The mature street scapes (including Berry, Blacket, Legge and Padbury Streets)
- The level of harmony in the built form, with a predominance of single-storey detached dwellings
- The narrow, intimate quality of the streets

All the reasons why Downer was not suitable for R3 medium density in 2004 still exist today.

It was also at this time that the ACT Government sold the local Downer shops, which was then owned by the Government, to a private investor to avoid the remediation costs of addressing asbestos in the building. The Downer Village currently hosts the Downer Vet and the Gang Gang café, but it no longer has the capacity to host local shops and because of space and heritage limitations.

In **March 2015** – *DV 322 – ACT Government Land Release Program* (facilitating the sale of the former Downer school site) proposed 300 units on the former Downer primary school site. The key take-out of that process was that the Downer Community was reluctant to lose the primary school, it did support the inclusion of three hectares of public land for affordable housing being sold to Community

Housing Corporation (CHC) on the understanding that there would be a commensurate return by the ACT Government to the Downer community in the form of facilities and social infrastructure, which the ACT Government has never delivered on.

It is not Downer's fault that CHC didn't deliver on the affordable housing or that the ACT Government failed to manage the arrangements to ensure that they did so. Additionally, the ACT Government didn't have to sell the final section of the primary school site to Goodwin for a pittance at \$8m, which also has limited affordable housing incorporated into that development.

The ACT Government also failed to deliver on its written undertaking to purchase the Downer shops and make the shop space available as community facilities.

In short, the ACT Government has squandered a greenfield space and the opportunity to deliver affordable housing and reneged on its undertakings to provide a commensurate return to the Downer community.

Notwithstanding the consistent mismanagement by ACT Government of Downer community space, the 300 dwellings built on the old school site represent a 20 per cent increase in the housing stock in Downer. In preparation for the development, ACTEW prepared a report which showed that the existing sewerage capacity in Downer couldn't cope with this sort of increase in dwellings in Downer. Three options were developed to deal with this:

- (a) Replace the mains in resident's back yard (not supported)
- (b) Install a new main along Swinden Street (sufficient only to support the 300 units being added) – this was the option that was ultimately implemented and which killed a number of mature trees in the process of doing so.
- (c) Do a major upgrade of sewerage infrastructure in Downer (also not supported).

The **Gateway Strategy 2018** – saw the proposed adoption of six storey buildings on Northbourne Ave, and four storey buildings on the blocks backing Northbourne Ave (west side of Blacket, Atherton and Banfield Streets). It also foreshadowed the creation of an infrastructure strategy and plan. However, nothing has been delivered on this, other than a few bike racks at the light rail stop on Swinden Street.

The question then becomes, how does the ACT Government propose to cater for urban infill in Downer without a major investment in the underlying infrastructure, without further major imposition on the community (eg, digging up back yards or destroying established and mature street trees to install sewerage infrastructure) and without any track record of delivering on its promises.

- **There is a lack of trust and confidence in the ACT Government and related planning authorities.**

In summary, in the past 20 years, the ACT Government:

- sold off 80 per cent of public community land and delivered nothing in return. The only community infrastructure remaining in Downer is the Downer Community Centre and the Downer Pre-School
- promised something in return to the Downer community for the loss of green space and social infrastructure – but has not delivered on those promises

- closed the Downer Primary School, despite the rapid and increasing number of children in Downer
- has twice attempted to close the Downer Pre-School 1997 and 2005
- closed the Downer public toilets.

The ACT Government has consistently demonstrated it is either unwilling or unable to deliver on its commitments to the Downer Community, or physical or social infrastructure to support such density increases. The DCA has no confidence the ACT Government and related planning authorities.

- **The hodgepodge of various planning, strategies and variations has now resulted in varying and inconsistent statements about building height intentions in Downer**

The District Plan identifies future investigation areas, including:

- **'general urban'** which means that up to three storey buildings could be built in Downer
- **'urban center'** which means that up to six storey buildings could be built in Downer.

Based on the map at page 115 of the District Plan, this results in inconsistencies with the adopted Gateway provisions:

- Northbourne Avenue – can provide up to six storey buildings (as per Gateway)
- The west side of Blacket, Atherton and Banfield Streets – can provide up to four storey buildings (as per Gateway)
- The east side of Blacket, Atherton and Banfield Streets – can now provide up to potentially six storey buildings (as per the District Plan as potential 'urban centre' for further investigation)
- Larger swathes of Downer – can now provide up to potentially three storey buildings (as per the District Plan as potential 'general urban' for further investigation).

As a side-snapshot, the current potential building heights in Downer as described in the various ACT Government planning documents and strategies appear to look something like this:

6 stories		6 stories	
5		5	
4	4 stories	4	
3	3	3	3 stories
2	2	2	2
1	1	1	1
Northbourne Ave	West side of Blacket, Atherton and Banfield Sts	East side of Blacket, Atherton and Banfield Sts	Large parts of Downer, at least towards Village

The DCA has previously called for, and continues to do so, for an integrated, holistic, vision statement for Downer. Because different 'chunks' of Downer keep being taken incrementally and in different planning documents, and it is leading to inconsistent and absurd outcomes.

Based on the last five 'strategies' impacting Downer, it seems that the ACT Government and planning authorities do not have an integrated or practical strategy for urban development in Downer.

The DCA seeks genuine engagement with the ACT Government and the planning authorities to develop:

- a vision strategy for Downer
- an infrastructure delivery plan for Downer
- a dedicated strategy for the restoration of Downer's tree canopy, and enhanced preservation measures for mature trees (taking the Goodwin development as the most recent example, which saw the ACT Government approve the loss of a number of 70+ year old Pin oak trees)
- a traffic and parking strategy for Downer
 - o this is one issue discussed on page 27 of the District Plan as a key feedback piece from the community (not just Downer residence). Not only does the District Plan not provide a response to the existing parking issues, but it is also actively promoting the **reduction** of parking currently available. Instead of planning for an improved parking and traffic management strategy, perversely the District Plan is facilitating a worsening of parking and traffic management and to use the existing narrow streets beyond their capacity. The existing R3 zone on Blacket Street, for example, has made the east end of Blacket Street unmanageable due to excessive on-street parking. If the District Plan is implemented in its current form, this will be exacerbated all over the suburb.

It was disappointing in the extreme to have the DCA's recent written invitation to Mr Ben Ponton, to attend a Downer Community Association public meeting to discuss the District Plan summarily dismissed and referred to the website for comments. The DCA will continue to advocate for the ACT Government to genuinely engage with the Downer community, and not limited to online submissions.

- **The potentially positive aspects of the District Plan will not necessarily benefit Downer.**

There are aspects of the District Plan, whilst admirable and easy to support as general sentiments, will never be realised for Downer.

For example, the District Plan contemplates that it will promote Downer to become a sustainable urban centre ("inclusive centres and communities"), and to make more local centres viable. As a general statement, this is easy to support.

However, as a specific statement and in the Downer context, the purported benefit will never be realised for Downer residents:

- the physical limitations of the Downer urban centre which is only 495 square metres, currently comprising of only two businesses – the Downer Vet and the Gang Gang café. There is simply no space for many (any) additional businesses.
- the heritage listing of the former CSIRO research farm buildings means that the footprint of the site cannot be expanded.
- Whilst the commercial building was restored in 2019, it is now privately owned.

Similarly, the sentiments in the District Plan about the establishment and investment in the “blue green network” are admirable, there are no creeks, continuous cycle paths or large and connected green spaces in Downer to apply the principles.

The reality is that few of the positives from the District Plan will affect Downer, whilst all of the negative aspects of the District Plan will.

- **Downer is a vibrant and cohesive community, which undertakes a range of activities to support and ensure a liveable space for its residents**

Downer is an active community, undertaking a range of activities to benefit its residents, including:

- Day to day running and maintenance of the Downer Community Centre
- Five ‘pocket parks’ in Downer looked after by volunteer groups
- Maintenance of the garden and green spaces at the Downer village
- Relocation and building of a new frog pond
- Local Downer residents purchased and restored the abandoned Downer shops
- Community members volunteer their time for Clean Up Australia Day, Floriade plantings, Party at the Downer Shops and support for other ad hoc events.

The DCA in conjunction with existing Downer residents will continue to make welcome new members to its community. Downer is not anti-development – rather, it supports thoughtful development which has regard to the unique characteristics of the suburb. In particular, the DCA would be willing to engage with the ACT Government on a pilot program or demonstration co-housing strategy, to provide enhanced opportunities to age in place.

As the current District Plan does not pay sufficient account the characteristics of Downer, the DCA does not support the District Plan in its current form.

The DCA would welcome a discussion with the ACT Government of a dedicated planning and devel-



opment strategy for Downer.



DCA Convenor
(On behalf of the Downer Community Association)



**SUBMISSION TO THE ACT PLANNING SYSTEM REVIEW AND REFORM PROJECT,
DRAFT GUNGAHLIN DISTRICT STRATEGY**

THE VILLAGE OF HALL AND DISTRICT PROGRESS ASSOCIATION

Village of Hall and District Progress Association
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President: [REDACTED]

**SUBMISSION TO THE ACT PLANNING SYSTEM REVIEW AND REFORM PROJECT, DRAFT
GUNGALIN DISTRICT STRATEGY
FROM THE VILLAGE OF HALL AND DISTRICT PROGRESS ASSOCIATION**

THE VILLAGE OF HALL AND DISTRICT PROGRESS ASSOCIATION

The Village of Hall and District Progress Association (VHDPA) is an incorporated, not-for-profit community association which promotes the interests of Hall Village and District community members. The objects and purposes of the Association are to further the interest and welfare of the community of the Village of Hall and District, to protect and progress the amenity and heritage character of the Village of Hall and, to facilitate the recreational, educational, environmental, heritage, artistic, occupational and other interests of members and residents of Hall Village and District.

The VHDPA is the Australian Capital Territory's oldest community association and represents a community that appreciates the Ngambri-Ngunnawal, historic and natural heritage values of its surrounding environment.

HALL VILLAGE

Hall Village was set out in 1881, while Gungahlin's modern development began 110 years later. This particular "village urban character" has been enshrined for protection in the VHDPA constitution, and the village has been recognised in the ACT Heritage Places Register since 2001.

In the Hall Village Master Plan dated May 2001 (number 20011438) then Minister for Planning, Simon Corbell, wrote that Hall is a special place that is valued by both its residents and the broad ACT community. To its local residents Hall provides a special ambience and village lifestyle. To the broad ACT community it provides a tangible link to the region's history.

Minister Corbell further noted that the Hall Village Master Plan recognised Hall as a discrete village, and established principles to protect its distinctive qualities by creating a rural buffer to any future development and providing a set of development control guidelines that respond to the natural and cultural identity of the area.

The VHDPA recognises that for the purposes of administration and service delivery within the ACT government, Hall will be attached to a larger "district" in the ACT. Nevertheless, when considering matters of planning, environment, character, watershed, heritage, conservation and recreation, Hall Village is an unique community and cannot be appropriately compared with, or incorporated in, any other district within the ACT.

Because of the uniqueness of Hall Village, the VHDPA recommends that the Gungahlin District Strategy include specific and unambiguous reference to this uniqueness. The Gungahlin District Strategy should specifically enshrine the provisions of the Hall Village Master Plan and the Hall Precinct Code 2013 (NI2008-27).

GUNG AHLIN DISTRICT STRATEGY 5 BIG DRIVERS

The draft ACT Planning District Strategies 2022 identify “5 Big Drivers”. The VHDP A has the following comments and recommendations on the Gungahlin District Strategy under the framework of the 5 Big Drivers.

Blue-Green Network

Hall Village has an unique position with respect to restoring and protecting nature reserves and the network of natural corridors, where conservation values can be protected, to contribute to a living blue-green network. The Hall Village Buffers as identified in the Hall Village Master Plan include the Kinlyside Reserve, Gold Creek Rural Lease, the Nature Park areas to the East, agistment and agricultural areas to the West, the Hall Showground, Polocrosse ground, sports fields, playground and nature area surrounding Halls Creek. These Blue-Green areas are key watershed and habitat for a range of rare or endangered species of flora and fauna including the Golden Sun Moth, Gang-Gang Cockatoo and remnant patches of Yellow Box/ Red Gum grassy woodland known to be associated with the Superb Parrot, Hooded Robin, Brown Tree Creeper, Swift Parrot, Regent Honeyeater. The Hall Cemetery includes the habitat of the endangered Leek Orchid.

The protected Aboriginal sites within the grassy woodland and along Hall’s Creek demonstrate a relative lack of physical disturbance within these areas, and reflect a natural and Aboriginal cultural landscape prior to European settlement.

In order to advance the Blue-Green Network of the Gungahlin District Strategy, the VHDP A recommends:

The Boundaries and Buffers as specified in the Hall Village Master Plan be explicitly included in the Gungahlin District Strategy and further development excluded from all Boundary and Buffer areas including the current conservation areas and agricultural leases.

Establishment of storm water drainage infrastructure in Hall Village to address current and future needs, cognisant of the increasing frequency and severity of storm events resulting from global climate change and consistent with the parameters of the Hall Master Plan and the Hall Precinct Code. This will make a significant contribution to water shed management within the Blue-Green Network.

Maintain the linkage of Kinlyside Reserve with the agricultural lease of Gold Creek Station for the ongoing conservation and protection of the Golden Sun Moth, Gang-Gang Cockatoo and remnant patches of Yellow Box/ Red Gum grassy woodland. This will enable the maintenance of the connectivity corridors from Halls Creek to Kinlyside Reserve and beyond.

Economic Access and Opportunity Across the City

There are numerous small businesses located in Hall Village. These currently include five hospitality businesses (three cafes, a licensed restaurant/ bar and a function centre set in an agricultural environment), motor mechanic, technology and engineering consultants, retail premises (jewellery, novelty, two hairdressers, accountant, beauty therapy, stock feeds), photographer, electricians, carpenters, plumbers, landscapers, veterinary clinic, medical centre and individual consultants in environment, heritage, education and international development, and others.

The unique rural heritage character of Hall Village, its position as a track head on the Centenary Trail, the Hall School Museum and Heritage Centre and the presence of eight locations of Canberra Tracks heritage signage in the Village, the Pony Club, Polocrosse, Axe Men's Club and monthly Hall Markets continue to attract local, interstate and international visitors.

Small business and sole-traders in Hall Village represent a meaningful contribution to the economic Access and Opportunity target of more jobs accessible to home. The attraction of visitors further contributes to economic activity of the ACT. In order to support small business activity in Hall Village, the VHDPa makes the following recommendations.

The VHDPa recommends a review of the current Commercial Rates that are applied in Hall Village present a substantial disincentive to further development of small business in the Hall Village commercial area of Victoria Street.

Although not directly part of the ACT planning system, the current state of internet broadband service in Hall Village presents an impediment to the viability of small business economic activity. The existing "fibre-to-the-node" and dated node-to-premises wire connections result in poor continuity of service and slow internet speeds. Businesses regularly face internet outages, affecting productivity and turnover. Similarly, mobile 'phone signal is also extremely weak, in spite of the towers in Kinlyside and One Tree Hill. This also results in the uselessness of "smart modems" that cannot function due to the strength of the mobile signal. The VHDPa recommends that priority be given to improved telecommunications in Hall Village include "fibre-to-the-premises" and addressing the ineffective mobile 'phone signal.

Strategic Movement

In 2019, a very rudimentary walking and cycle track was scaped alongside Victoria Street but has never been suitable for anything other than mountain bikes and is unusable by other cyclists or casual walkers. Despite the best efforts of ACT government staff responsible for track maintenance, this track continues to deteriorate and recently even those riding mountain bikes are avoiding the eroded track with where culvert covers are also damaged and dangerous. Numerous cyclists and walkers continue to travel on the road along Victoria Street between Hall Village and the formed cycle and pedestrian path at Clarrie Hermes Drive. Victoria St is narrow, has no formed shoulder and very rough edges. The VHDPa has been advised that construction of a fully formed and sealed cycle/ pedestrian path has been placed on a priority listing for future works but it has not been identified as an immediate priority.

Currently, the only public transport serving Hall Village is CDC Transport (formerly QCity, Deanes, Transborder) providing school bus services connecting NSW communities to schools in the ACT using Hall Village as an interchange. This is also one morning public service by CDC from Yass via Hall to Belconnen and an on-request service through Hall to Yass in the afternoon.

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To further contribute to the Gungahlin District strategy target of Improved Community Wellbeing, the VHDPa makes the following recommendations.

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CONCLUSION

The Village of Hall and District Progress Association welcomes the development of the Gungahlin District Strategy while recognising that Hall Village remains an unique community and cannot be appropriately compared with or incorporated in any other district within the ACT.

The VHDPA considers that there a number of opportunities where modest action and investment in Hall Village will contribute significantly to the identified targets within the Gungahlin District Strategy while conserving Hall's distinctive environmental and heritage qualities.



WESTON CREEK COMMUNITY COUNCIL COMMENTS FOR:

**THE ACT PLANNING SYSTEM REVIEW AND REFORM PROJECT
DRAFT TERRITORY PLAN**

Submissions close:

Friday 3 MARCH 2023

[https:// yoursayconversations.act.gov.au/act-planning-review](https://yoursayconversations.act.gov.au/act-planning-review)

Your local voice



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ABOUT WESTON CREEK COMMUNITY COUNCIL (WCCC)

Weston Creek Community Council (WCCC) appreciates the opportunity to comment on the **Draft TERRITORY PLAN.**

As a Community Council we are committed to advocating and supporting the Weston Creek residents in pursuing the expectations and values that enhance and ensure their safety, well-being, and quality lifestyles. The community of Weston Creek value their unique village atmosphere, garden landscapes, and open green spaces as vital links to physical and mental well-being. Planning and development, climate change, and distribution of amenities and resources are topics of high interest and importance in Weston Creek.

To inform this submission Council has actively engaged in the Planning System Review and Reform Project over a number of years. This has included: participation in stakeholder workshops, hosting information meetings with guest speakers, encouraging an ongoing dialogue in the community via a WCCC online discussion group, meetings with community individuals, businesses and groups, newsletters, meeting with MLAs, and reading and circulating documents.

WCCC POSITION ON THE DRAFT PLANNING BILL

The Territory should be planned, designed, and developed to:

- be well-connected in ways that facilitate the safe, secure, and effective movement of people within and through them
- to support active and healthy lifestyles and to cater for a diverse range of cultural and social activities
- to be sustainable with focus on achieving energy efficient urban environments that address the implications of climate change

Council acknowledges and supports the Government's vision to review the current planning system. However, for true reform Council suggests that two Acts are required:

- **a Planning Policy Act and**
- **a Planning Administration Act.**

Unfortunately, the Planning Review has missed the opportunity for meaningful reform and ploughing ahead with District Strategies and a new Territory Plan (when the fundamentals of the Planning Bill have not been addressed) is a recipe for disaster.

Weston Creek Community Council provides the following comments and recommendations against the **DRAFT TERRITORY PLAN NOVEMBER 2022** for consideration.

FURTHER COMMENTS TO THE DRAFT TERRITORY PLAN

GOVERNANCE

The Territory Plan sets a statutory framework for the future of development in the ACT. The intent is to have a policy about how land can be used and what can be built where.

Of great concern is that the **Design Guides** are not available for comment. Design guides will be valuable in achieving quality outcomes. It is however difficult to comment when these guides have not been published. Concerns include:

- It is important that building and development criteria be protected within the law. It is suggested that this could be achieved firstly in the Planning Act
- Greater emphasis on the human condition and the human right to a healthy environment needs to be explicit
- Clarification is required around the six urban character zones and transect thinking. If the land use zones are not being replaced, how will they be used and enforced. What will be the compliance and appeal and processes?
- With the increase of mixed-use development, design guides for commercial and industrial areas should be available.

For the **development application (DA)** process clarification is needed:

- Where is the standard for obtaining approvals? There are concerns for timeliness, builder holding costs, and deliverable quality.
- The Territory Plan specifies the level of compliance required. But what is the complaints process? Questions remain about compliance and enforcement. What will be the procedure and the consequences?

Council has provided more detailed feedback on these guides within the WCCC submission on the District Strategies.

Council has ongoing concerns about the application of enforcement activity. One prominent example being the case of the recent non-compliant dual occupancy construction in Torrens. Happy to discuss this at future consultation, with examples, or have a separate conversation.

DISTRICT POLICIES

The success of the writing and implementation of the **District Strategies** will be dependent on thorough community consultation. Residents value the area's garden village atmosphere.

With the future developments of LDK, Fetherston and the RSPCA site, the options for people to downsize while staying in their communities has increased, this needs recognition in the Territory Plan.

The Western Creek District retains strong connections to surrounding open space. The Western Edge must be protected within the Territory Plan.

Council has provided more detailed feedback about the Weston Creek District Strategy in a separate submission.

ZONING

Council is of the view that the stewardship of the territory's land holdings is of the outmost importance and therefore should be open to the scrutiny of the Legislative assembly at all times. Zoning must form part of the Planning Act.

Other points to be resolved:

Residential Zones Policy.

- the impacts on residents - for example, the inclusion of **air quality**.
- Ensuring infill and densification does not have unreasonable negative impacts on people and their economic situation
- Community consultation for redevelopment of sites

Commercial Zones Policy

- Promoting active living with attractive, safe, and well-lit pedestrian environment is welcomed in the Territory Plan. It is hoped that this would apply to all zones, not just CZ1 Core Zone.

Community Facility Zones Policy

- The definition of temporary use to be clearly articulated
- Safeguarding the amenity of surrounding residential areas to include heat and air quality

Parks and Recreation Zones Policy

- Parks and recreation areas that are valued by a community should be explicitly listed, mapped, and preserved, for example Coolo

Non-Urban Zones Policy

- It is crucial that rural zone areas have special consideration so that the territory can maintain and grow its food source. These areas also provide a bush fire buffer zone. Council supports urban growth boundaries. Rural land significance needs explicit mention in all District Strategies with links to the Food and Fibre Strategy. This includes investigation areas.
- Hill ridges and buffer zones need protection not just for visual separation of suburbs but also to act as a green space and noise buffer
- The river corridor zone must be protected from suburban run off and sprawl for river quality
- Non-urban zones, Mountains and bushlands are also an important component of well-being and mental health

More extensive consultation is also recommended for Zone Policies, particularly the relationship between transect thinking character types and current zoning. Specifically, in the RZ1 and RZ2 sections.

Council requests clarification around:

- Where current documents, such as the Urban Forest Bill and Living Infrastructure Framework, fit in and/or relate to then Territory Plan.
- The process for exemptions and demonstration projects
- The zoning code for community housing
- Subdivision of blocks and related building timeframes

- The maximum number of dwellings permitted in multi-level RZ2
- The removal of plot ratio
- Simplification of the solar envelope to one angle
- Reducing the height of a lower floor level from 1.8 to 1m. There is community and business concern of the implications of this particularly for small set back and loping blocks
- More detail and consideration of bushfire risks and urban heat island effects. This IA a significant issue for Weston Creek residents

LEASE VARIATIONS

Accessible sites for civic life and community groups are under great pressure. Families and communities should have good access to facilities and services. These should be protected from competition from other uses.

The current urban development and population expansion of the ACT, combined with the present land lease arrangement, may suggest a need for a review of this process.

Council notes the formula of removing a concessional lease and that a concessional lease guideline is a notifiable instrument. Council does not agree.

Variation of leases and amendments have become problematic in the ACT. With the deletion of the pre-consultation process, community awareness of, consultation with and feedback of any such changes could be diminished.

DISTRICT SPECIFICATIONS and TECHNICAL SPECIFICATIONS

Provisions to support compliance with development requirements are referenced as Technical Specifications. The main concern here is the adherence of compliance and any necessary enforcement.

Additional information is required for District Specifications DS6. All development should have open community consultation and avenues for feedback and appeal. For example, Council does not support DS6: Weston Creek 1.8 Weston demonstration housing without community consultation. In a public meeting organised by Council, a range of community opinions were put forward on this project. It therefore requires further consultation and transparent processes.

Further information is required in the Environment and Heritage specifications. Particularly tree protection, planting, and canopy.

Council notes the recent media comments by the Minister and Chief Planner have ignited a widespread debate in the community about parking. Council also notes that a revised Territory Parking Policy has been under development for a long time. Council, therefore, reserves its right to comment until the position is settled.

Thank you for the opportunity to provide this input on the ACT Planning System Review and Reform Project, Draft Territory Plan. As an active community group, we look forward to participating in any future discussions.

As a priority, Weston Creek Community Council has broadened the areas and fields of its community consultation to best express the views of a wide range of groups. We believe that our consistent and ongoing consultation with the community through our surveys, public meetings (which are also available digitally), social media presence, newsletters and projects have proven to be valuable avenues of people being able to have their say, be listened to and be involved in decision making. We reiterate our open invitation to Government Ministers to address the Weston Creek Community Council at public meetings.

Yours sincerely

██████████

Chair, Weston Creek Community Council
info@westoncreek.org.au

Submission by the Yarralumla Residents Association on the ACT Government's New Planning Framework

Yarralumla Residents Association

The Yarralumla Residents Association (YRA) Inc. is a non-profit association incorporated in the Australian Capital Territory. Its aims are:

- To provide a focus and co-ordination point for representing the views of the Yarralumla community;
- To work towards maintaining and improving the quality of life of the Yarralumla community; and
- To keep the Yarralumla community informed about policy, environmental and social issues affecting or likely to affect Yarralumla.

This Submission addresses the District Strategies, New Draft Territory Plan, District Specifications, Technical Specifications, and the "Explanation of Intended Effects for: ACT Urban Design Guide ACT Housing Design".

EXECUTIVE SUMMARY

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.
3. The Planning Bill 2022 s47 is amended to reflect the provision of the *Planning and Development Act 2007* namely "s108(2) *The planning strategy is not part of, and does not affect, the territory plan.*", and the District Strategies should not be referenced in the legislation.
4. The components of the planning framework that are used for assessment are statutory, in particular the Technical Specifications.
5. The proposed directions for the New Planning Framework that underpin the District Strategies and the ACT Planning Strategy 2018 have been reassessed given the new work and energy paradigm.
6. The key issues raised in this Submission have been comprehensively addressed in the New Planning Framework.

1. The new District Strategies, and the ACT Planning Strategy 2018, set 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.
2. The extensive high density, high rise, densification of Yarralumla and adjacent Deakin proposed by the ACT Government in the Inner South District Strategy is not supported.



3. The scale of redevelopment proposed for Yarralumla and Deakin in the Inner South District Strategy, is excessive, with 30%-50% of the residential area of the suburbs to become 3-6+ storeys apartments.
4. The low rise, low density character of Yarralumla and Deakin that is highly valued by residents should be retained, together with its heritage and biodiversity.
5. The Residents Association meeting on the New Planning Framework, on 14 February 2023 was attended by 200 residents, and 97.5% did not support further densification of Yarralumla and Deakin and 2.5% supported limited densification.
6. The community conveyed their strongly held views on retaining the character of the suburbs to ACT Government at the Inner South District, district planning consultation in 2021, but there has been no change to the proposed scale or direction of densification.
7. The Canberra Brickworks development that is underway, together with the CSIRO Forestry redevelopment, will add 730 new residences to Yarralumla, that is a 50% increase in the number of dwellings in the suburb - further infill is not warranted.
8. The Inner South District Strategy shifts the urban core and urban centres of the Yarralumla and Deakin to the sections adjacent to the Adelaide Avenue Expressway, this is a major change and does not keep the existing character of the suburbs.
9. The Inner South District Strategy redevelopment of Yarralumla, with high rise, high density apartments, will require the zoning of Yarralumla 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.
10. The major change to Adelaide Avenue and its surrounds does not recognise that the existing road is a pedestrian free, arterial expressway, that has many cuttings and embankments that will challenge redevelopment. Nor does it recognise the Commonwealth responsibility for this Designated Area, Main Avenue and National Land.
11. The current planning framework, under the *Planning and Development Act 2007*, s60 and s61(b)(i), requires the National Capital Authority to be engaged on the proposed changes, including those to the Territory Plan and the National Capital Plan and a written report provided to the Minister s69(2)(9b)(ii). Engagement with the National Capital Authority is not evident.
12. The Inner South District Strategy proposed redevelopment for Yarralumla and Deakin, takes a plain sheet of paper "Greenfields" approach to what is an existing populated urban residential and commercial environment and would include large scale redevelopment of existing, houses, shops, schools, childcare centres and Embassies, and result in the loss of endangered species and habitat - this is not supported.
13. Compulsory acquisition of existing properties in Yarralumla and Deakin appears necessary for the consolidation of blocks, and the large scale demolition and redevelopment of areas, including the construction of new roads.

14. The Mint Interchange will be required to provide access to the West Deakin commercial centre, light rail notwithstanding. The cost of the Mint Interchange was estimated by AECOM and SMEC to be \$104m in 2013.
15. 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 non-statutory components, and lack of hierarchy. It is likely to be more costly and less efficient.
16. 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.
17. The *Planning Bill 2022*, once passed, formally locks into the Territory Plan both the District Strategies densification, and the target of 70% of new housing being in existing urban areas. Such inflexibility should not be enshrined in the statutory planning framework but remain in policy documents.
18. The Planning Bill 2022 s47 is amended to reflect the s108(2) provision of the Planning and Development Act 2007 for the planning strategy, and the District Strategies should not be referenced in the legislation.
19. There have been recent significant shifts in the work, transport and energy environment. Commuting to work is no longer the norm and on weekdays up to 70% of government employees are working from home, there is rapid increase in uptake of electric vehicles for private and fleet transport, and the ACT achieved 100% renewable electricity supply on 1 January 2020. These make a planning strategy based on increased commuting by public transport, and reducing vehicular CO₂ emissions questionable.
20. 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.
21. 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.
22. Community consultation has not met good practice as set out in the *Planning Bill 2022*. Community views must now be genuinely considered and comprehensively reflected in the new planning framework.

The New Planning Framework – Key Issues

1. Densification of Deakin and Yarralumla

The extensive high density, high rise, densification of Yarralumla and adjacent Deakin proposed by the ACT Government in the Inner South District Strategy is not supported.

The Residents Association meeting on the New Planning Framework, on 14 February 2023 was attended by 200 residents, and 97.5% did not support further densification of Yarralumla and Deakin and 2.5% supported limited densification.

The low rise, low density character of Yarralumla and Deakin that is highly valued by residents should be retained, together with its heritage and biodiversity. This message has been repeatedly conveyed to ACT Government, including in the feedback from the community for Inner South District, district planning consultation in 2021, but has not resulted in any change.

The ABS Census 2021 provides the current profile of Yarralumla and adjacent Deakin:

Yarralumla	Deakin
1420 dwellings	1,345 dwellings
65% separate houses of 1 or 2 storeys (RZ1)	68% separate houses of 1 or 2 storeys (RZ1)
27% semi-detached or townhouses (RZ2)	18% semi-detached or townhouses (RZ2)
80% 3+ Bedrooms	77% 3+ Bedrooms

As shown by the ABS census data, the profile of the two suburbs is two thirds separate houses, currently zoned RZ1, and one third townhouse type residences in proximity to the shopping and business centres, zoned RZ2.

The scale of change proposed in the Inner South District Strategy for Yarralumla and Deakin is excessive. The redevelopment proposed is for 30%-50% of the residential area of each of the two suburbs to be 3-6+ storey apartments. This does not retain or protect the low rise, low density character of the two suburbs that is highly valued by residents.

For Yarralumla the redevelopment of the Canberra Brickworks site, already underway, together with that of the CSIRO Forestry site, will add 730 dwellings to Yarralumla. These two developments alone will increase the number of dwellings in Yarralumla by 50%, and add commercial and retail space, hotel, and aged care facilities. Further densification beyond this is not warranted.

The proposed high rise, high density urban infill, in Yarralumla and Deakin shifts the urban core and urban centres of the suburbs to the sections adjacent to the Adelaide Avenue Expressway. This is counter to the communities' heart and focal point which is the two thriving shopping and business centres. This a further major change that does not keep the existing character of the suburbs.

2. Residential Zoning Changes for RZ1 and RZ2

The proposed **scale of redevelopment** for Yarralumla in the Inner South District Strategy, with high rise, high density, **does not align with the zoning of Yarralumla set out in the draft Territory Plan (Part E1):**

Residential Zones Policy in Draft New Territory Plan 2022

RZ1 – Suburban Zone

The fundamental desired outcome for the RZ1 zone is to achieve and/or maintain low density residential neighbourhoods in suburban areas.

RZ2 – Suburban Core Zone

The fundamental desired outcome for the RZ2 zone is to facilitate development or redevelopment of sites within reasonable proximity to local services to achieve a mix of low to medium density housing.

As shown above Yarralumla is zoned RZ1 (low density) and RZ2 (low to medium density). In order to give effect to the Inner South District Strategy **the zoning of Yarralumla and Deakin** in the draft Territory Plan **will need to be changed to RZ4 Medium Density Residential Zone and RZ5 High Density Residential Zone.** The requirement for such zoning changes is not made clear.

The proposed changes to RZ1 and RZ2 zoning will provide for 90m² secondary dwellings, basements, and for building coverage up to 70% of a compact block. This will **create heat islands and hence not mitigate climate change impacts as required in the draft Territory Plan.**

3. Adelaide Avenue

The Inner South District Strategy proposes major change to the function of Adelaide Avenue and its surrounds:

“Transforming and humanising Adelaide Avenue - With the integration of light rail, Adelaide Avenue could be transformed. This area is currently dominated by a wide roadway and is challenging for pedestrians to cross. In future, Adelaide Avenue could be a vibrant, multimodal corridor that better connects into local neighbourhoods in Yarralumla and Deakin.”

This does not recognise that **the existing road is a pedestrian free, arterial expressway**, that has many cuttings and embankments, and there is good connectivity between the two suburbs by roads that go over or under Adelaide Avenue. Nor does it recognise the Commonwealth responsibility for this Designated Area, Main Avenue, and National Land.

4. Inner South District Strategy – Areas for New Housing, Change Areas and Sustainable Neighbourhoods

The proposals in the Inner South District Strategy for the future development of Yarralumla and Deakin does not recognise, and bears no relationship to, the existing built environment (residential, community, commercial, and retail) and the road infrastructure and street network.



The proposed densification and redevelopment of Yarralumla and Deakin could not be undertaken without large scale procurement and demolition of the existing built environment and loss of public open space. This would include existing schools, childcare centres, houses, shops, schools and Embassies, and result in the loss of endangered species and habitat. It would also require the acquisition of Commonwealth land, approvals of the National Capital Authority and changes to the National Capital Plan.

This raises the question as to whether **the ACT Government is intending to use Compulsory Purchase of Residential and Commercial Blocks** to effect such large-scale redevelopment.

The redevelopment takes a plain sheet of paper, **Greenfields approach to an existing populated urban residential and commercial environment**, that is a Brownfields site, and would include large scale redevelopment of existing, houses, shops, schools, childcare centres and Embassies, and result in the loss of endangered species and habitat. This is not supported and raises a number of major issues outlined below.

National Capital Authority and National Capital Plan

Adelaide Avenue, from State Circle to the Cotter Road flyover is a Main Avenue, and the land adjacent to it, is a Designated Area and a Commonwealth responsibility under the National Capital Authority and National Capital Plan.

The proposed Adelaide Avenue redevelopment, to high rise, high density, includes the Yarralumla and Deakin Diplomatic Precinct which is National Land (Commonwealth) and also the responsibility of the National Capital Authority. This Diplomatic Precinct currently comprises the Embassies of Saudi Arabia, Nigeria, Sri Lanka in Yarralumla, and that of Italy in Deakin. The Canberra Grammar School in Grey Street Deakin, currently zoned “Community Facility,” is also in this area for redevelopment is an endangered grasslands habitat.

Deakin Local Centre and West Deakin

The proposal for the “Deakin Local Centre” provides for a complete redevelopment of the Business and Shopping Centre and the area adjacent to Hopetoun Circuit:

“Deakin will be a high amenity centre, with renewed streets and a new community heart offering a variety of services and facilities for locals and people from further afield, with safe pedestrian access to light rail.”

This proposal puts new streets through existing dwellings, “creates regular urban blocks of one hectare or less”, and realigns existing streets into a grid pattern.

The proposed approach in West Deakin:

“West Deakin will be a high employment hub, walkable grid structure, parks and safe pedestrian access to light rail.”

This is similar in terms of imposing a grid street pattern on a commercial area that has curved streets and crescents. **Strickland Crescent is removed and two new Streets created.**

In the residential area of West Deakin, between Kent Street and Adelaide Avenue, the proposed connection of Kintore Circle in Yarralumla to complete the circle in Deakin would involve acquisition and demolition of many residential and other buildings.

The proposed creation of a Local Park at Block 2 Section 35, Deakin would require the demolition of the recently developed Equinox Business Park which has a Gross Floor Area of 25,000m², parking for 569 vehicles and 80 Bicycles, and a 5 Green Star Rating.

These outcomes do not align with the intent of the District Strategy for the Inner South or the New Planning Framework.

Commercial and Residential Area Road Network

The major redevelopment of Yarralumla and Deakin in the Inner South District Strategy, particularly that proposed for the major increase in the scale of West Deakin as a commercial employment hub for health services and education, does not take account of existing impediments to access to the area. The District Strategy only covers small scale local changes to connectivity between Deakin and Yarralumla.

The majority of people accessing West Deakin come from outside the area, and as an employment and specialist health hub this will continue to be the case. Access to West Deakin from Molonglo and North Canberra is via Dudley Street in Yarralumla via the Novar Street intersection and Kent Street in Deakin. Dudley Street is a minor road that currently carries Arterial Road levels of traffic at 10,000 vehicles per day (vpd), and Kent Street carries over 12,000 vpd. At am and pm traffic peaks this results in kilometre long congestion in Dudley Street and this had made access to and egress from Yarralumla by residents and visitors problematic.

The traffic modelling undertaken for the Canberra Brickworks redevelopment by AECOM and SMEC in 2012-13 demonstrated that a major interchange “The Mint Interchange” will be required to provide access to the West Deakin commercial centre to prevent the roads from being overwhelmed, light rail notwithstanding. The cost of the Mint Interchange was estimated to be \$104m in 2013. The ACT Government advised at the time that the construction of the interchange would be considered in the planning for Stage2B of Light Rail from Civic to Woden.

Whilst Light Rail can provide transport for a certain number of employees and visitors to West Deakin it does not provide for patients going to hospital for specialist treatment nor the large number of trade and commercial vehicles needed to service the area. This major connectivity issue needs to be fully recognised and addressed to avoid Yarralumla residents being unable to travel in or out of their suburb and West Deakin Hub becoming inaccessible.

5. Outcomes Based Approach

The proposed framework has many “moving parts” and also relies on non-statutory supporting material in its assessments, including the District Specifications, Technical Specifications, and the ACT Urban Design Guide and the ACT Housing Design Guide.

The assessments are qualitative and focussed on broad outcomes rather than a quantitative, measurable approach. As a consequence, the basis for decisions will lack clarity and not be transparent or repeatable.

The non-statutory supporting material used in assessments have no legal standing, and hence are not material to any legal review process. This will be problematic for proponents and interested parties when seeking a review of planning decisions by the Planning Authority or ACAT (ACT Civil and Administrative Tribunal).

The outcomes-based approach is made even more complex by the many competing or conflicting requirements from the broad range of policies and outcomes (e.g. urban infill and mitigating urban heat). This is exacerbated by the fact that the elements in the framework are interrelated and as such there is no clear hierarchy for assessments.

The proposed outcomes-based planning framework **cannot produce consistent and predictable planning outcomes**, will create uncertainty for proponents and interested parties, be **more costly**, and is unlikely to be streamlined, effective or efficient.

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 non-statutory components.

6. Conflicts in Direction and Policy

Under the *Planning Bill 2022* the Territory Plan must give effect to the 2018 ACT Planning Strategy and the new District Strategies. The *Planning Bill 2022 Part 2.2 s10(2)* also requires that
(b) effort should be focussed on adapting to the effects of climate change, including through mitigating the effects of urban heat, managing water supplies and achieving energy efficient urban environments;

There are a number of ACT Government policies that shape the planning framework, in particular the Climate Change Strategy 2019, Urban Forest Strategy 2021, Urban Forest Bill 2022, and a this creates major conflicts in delivering the planning outcomes.

The Urban Forest Strategy and Bill 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%.

The proposed densification and urban infill can only result in a major reduction in the urban canopy cover in Yarralumla and Deakin. In addition, the new RZ1 and RZ2 zoning which provides for secondary residences, basements, and for buildings to block cover 70% of the block, will result in loss of private green space for trees, including the garden areas over basements as these have insufficient soil depth for tree growth. There are no plantable areas in these older suburbs where additional large tree plantings can occur to replace such losses.

There is a direct inverse relationship between tree canopy cover and urban heat (Urban Forest Strategy 2021). Hence the densification and urban infill proposed in the Inner South District Strategy will create urban heat islands in Yarralumla and Deakin where they do not exist at present. This is in direct conflict with the Planning Bill (s10(2)) and Territory Plan and reduces the tree canopy cover in both these suburbs to below the Urban Forest 30% target that is currently being met.



The Inner South District Strategy should be revised to ensure that loss of tree canopy cover to below 30% 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. District Strategies Long Term Legislative Lock-in

The proposed District Strategies are new and do not exist in any form in the current planning framework. The District Strategies and The ACT Planning Strategy 2018 set the direction for long term large scale, high density urban infill, that is predominantly high rise, with the requirement that 70% of new housing is in existing urban areas. The *Planning Bill 2022*, once passed, then formally locks this target and the District Strategies into the Territory Plan:

"s47 The territory plan— (b) must give effect to the planning strategy and district strategies"

This is a major change from the current situation where there are no District Strategies and no direct connection between the ACT Planning Strategy and the Territory Plan. The current *Planning and Development Act 2007* provides that:

"s108(2) The planning strategy is not part of, and does not affect, the territory plan."

The legislative provision for the amendment of the District Strategies, as provided for in the *Planning Bill 2022* is circular, as they can only be changed within the existing principles and policies that have already been set.

"s40 Amendment of district strategy (b) the amendment is consistent with the principles and policies for development of the district set out in the district strategy."

The outcome of these legislative changes is to lock in a target and 40-year strategy with the ability for some fine-tuning but not for substantive change.

Such inflexibility should not be enshrined in the statutory planning framework. It is unsound legislative practice, precludes changes in policy and cuts off the ability to respond to changing circumstances.

The *Planning Bill 2022* s47 should be amended to reflect the s108(2) provision of the *Planning and Development Act 2007* and the District Strategies should not be referenced in the legislation.

8. Reassessment of Urban Densification and Infill Rationale

The rationale underlying densification, and for 70% of new housing being in existing urban areas, is to reduce Canberra's carbon footprint by concentrating compact development adjacent to key public transport corridors. This target is set out in the ACT Planning Strategy 2018, however there have been recent significant shifts in the work, transport and energy environments since that time that need to be taken into account.



In 2019 the ACT Government set the target of reducing emissions by 50–60% (from 1990 levels) by 2025 and a goal of net zero emissions by 2045. The ACT Government has introduced incentives for electric vehicle uptake and is moving its fleet of buses to electric, and by the start of 2020 Canberra had **achieved 100% renewable electricity supply**. The paradigm for the planning strategy has fundamentally changed.

Covid has seen the embedding of hybrid work, where **commuting to work is no longer the norm and on weekdays up to 70% of government employees are working from home**. This change in work patterns has been reflected in the use of public transport in the ACT. Light rail commenced in April 2019 the end of Covid work from home restrictions ceased in Canberra in early 2022. A comparison of boardings and journeys on of bus and light rail in late 2019 and March 2022 (the most recent data available) shows a drop of 45%.

The rationale underpinning densification and 70% of new housing being in existing urban areas should be reassessed given the fundamental changes in the work, transport and energy paradigm, and the existing planning framework should remain in place.

9. Consultation

The approach to consultation on the New Planning Framework **does not meet the principles of good consultation as set out in the new Planning Bill 2022**

s11(d) consultation is meaningful if—

- (i) information provided as part of the consultation is adequate to ensure all stakeholders understand the subject of, and issues relating to, the consultation and can give informed responses; and*
- (ii) it genuinely seeks community feedback; and*
- (iii) community views are genuinely considered and incorporated into final decisions*

Community Engagement

There has **been insufficient advice** to, and engagement with the community, by the ACT Government for a package of **measures of such complexity that proposes such extraordinary changes** to the nature of suburbs through densification and large-scale redevelopment.

The consultation on the New Planning Framework that comprises over 2,500 pages has been scheduled to occur over the School Holiday and Christmas New Year holiday period 2022-23, thereby limiting the opportunity for community input.

Not all the elements of the framework have been provided, for example there are no Design Guides, rather an "Explanation of Intended Effects for: ACT Urban Design Guide ACT Housing Design" has been provided. Some are incomplete for example there is no Precinct Map for Yarralumla, although there is one in the current Territory Plan.

Aspects of the advice by the ACT Government has been presented in a way that can readily be misunderstood. For example, the ACT Government advises:

*"The proposed (Territory) plan does not include major changes to current zoning."
(At a Glance - proposed Territory Plan https://hdp-au-prod-app-act-yoursay-files.s3.ap-southeast-2.amazonaws.com/3216/6728/5394/Snapshot_Territory_Plan_Overview.pdf)*



It is not made clear that in order to “give effect to the District Strategies in the Territory Plan” as required by s47 Planning Bill 2022, major changes to the Territory Plan and the zoning of districts and suburbs will be required. The residents of Deakin and Yarralumla would be under the misapprehension that the zoning will not be changed to provide for major densification for 30-50% of the area to be redeveloped to 3-6+ storey apartments. **This is misleading.**

The information provided in the Inner South District Strategy for the future development of Yarralumla and Deakin does not explain how such major redevelopment will be undertaken. The information provided does not address the likely need to consolidate a large number of Blocks to get sufficient scale for demolition and redevelopment, nor whether this will require **Compulsory Acquisition** of properties. **This is not adequate.**

Community views have not been genuinely considered to date. The feedback from the community from the district planning consultation for Inner South District in 2021 has not been taken into account in particular:

Draft Inner South District Strategy (Page 91)

- 1. Development to be in keeping with existing character*
- 2. Balance urban infill with existing character and amenity*
- 3. Encourage growth of large trees, maintain shade trees and increase tree planting*
- 4. Make sure housing diversity caters for ageing in place, affordable housing and family homes with large blocks.*

[https://hdp-au-prod-app-act-yoursay-files.s3.ap-southeast-](https://hdp-au-prod-app-act-yoursay-files.s3.ap-southeast-2.amazonaws.com/7716/6848/3097/Draft_Inner_South_District_Strategy_-_08.11.22.pdf)

[2.amazonaws.com/7716/6848/3097/Draft_Inner_South_District_Strategy_-_08.11.22.pdf](https://hdp-au-prod-app-act-yoursay-files.s3.ap-southeast-2.amazonaws.com/7716/6848/3097/Draft_Inner_South_District_Strategy_-_08.11.22.pdf))

Community consultation has not met good practice, and community views now need to be genuinely considered and comprehensively reflected in the new planning framework.

National Capital Authority - Consultation

The *Planning and Development Act 2007*, s60 and s61(b)(i) requires that the ACT Government’s planning and land authority, in preparing to vary the territory plan must consult with the National Capital Authority. In addition s69(c)(ii) requires that when presented to the Minister draft variations to the Territory Plan must include a written report about the planning authority’s consultation with the National Capital Authority and the public under s69(c)(i). **Engagement with the National Capital Authority on the draft Territory Plan** and the New Planning Framework **is not evident.**

Customer Service
Land, Planning and Building Services Shopfront
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Dear Mr Ponton

Woden Valley Community Council (WVCC) Submission - ACT Planning System Review and Reform Project

Thank you for the opportunity to comment on the draft Territory Plan and Woden District Strategy. Our comments are in the context of the ACT's governance arrangements, land use planning and development controls. This WVCC has held many events over the years and this submission communicates the views, expectations, and concerns of many community members.

The WVCC supports development and urban infill, however we want it to be done well with a focus on people and the bush capital. Town planning is holistic and balances competing priorities for land, it includes consideration of homes, jobs, public (green) spaces, community facilities and public transport to connect us to our social and commercial hubs.

The message is that the:

- Woden District Strategy does not balance competing priorities for land use with uncertainty around public spaces in the core of Woden and a lack of community facilities.
- The development controls in the Territory Plan through the Woden District Policy and the zone codes do not provide enough certainty to the community about good outcomes as developers will push the limits of the guidance.

Governance

Given the ACT Government's unicameral system of government, its small Assembly, and the lack of local government, too much power resides in the hands of too few. There are not enough opportunities for independent advice and review of land use planning and development controls, and appeal to ACAT is still not permitted in various areas, including the Town Centres.

The primary documents setting out the outcomes should be disallowable instruments under the Planning Bill 2022 and considered by the Legislative Assembly, including:

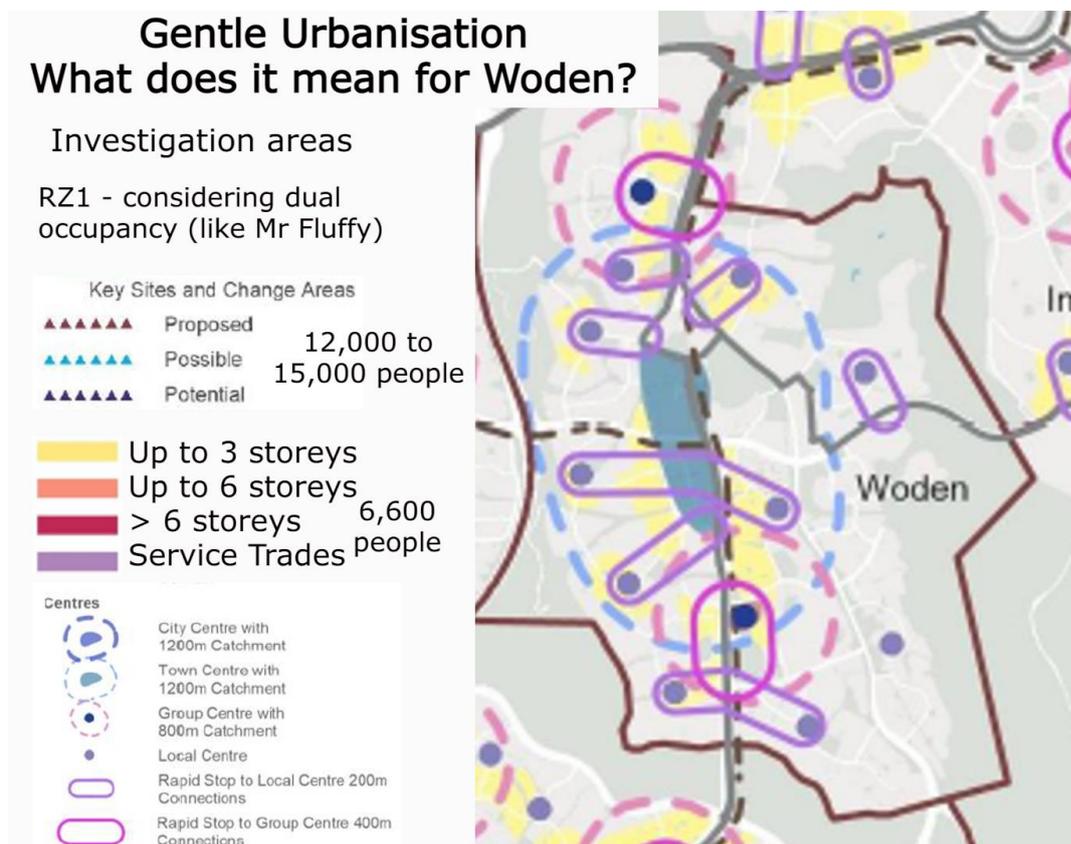
- **Planning Strategy** - desired future planning outcomes for the Territory (NI s36(4)).
- **District strategies**— desired future planning outcomes for Districts (NI s38(4))
- **The Territory Plan**—desired planning outcomes, land use zones and development assessment provisions (NI s45(2))
- **Territory Priority Project** — a development proposal declared to be a territory priority project under section 215 (notifiable instrument s213(a))
- **Offsets policy** – how environmental compensation may be made to offset the impact of development that has a significant adverse environmental impact on protected matters; (notifiable instrument s227(2))

The planning system is opaque and lacks transparency leaving the community with very little opportunity to influence the vision and the outcomes for the ACT and their districts.

- comprehensive discussions with representatives of the community are required to determine the desired objectives and outcomes and consider the variety of options to realise them
- independent advice is required to provide a different perspective to the options to develop the city in an equitable manner
- checks and balances need to be included, for example changing the above documents to disallowable instruments to allow the Legislative Assembly the opportunity to debate planning policy and bring motions to amend outcomes
- accountability for implementation for the agreed land use outcomes needs to be transparent. To date each block in the Woden town Centre has been developed in isolation and governance around collaboration and cohesive planning to deliver great outcomes is absent.
- access to appeal to ACAT on matters of law, development controls need to be in the law.

Woden District Strategy - Land Use Planning – Densification outcomes in the suburbs

Most of Woden is included in the Future Investigation Areas which will be analysed for development opportunities that will require zoning changes. See **Attachment A** for high levels of densification.



While this reform does not change the current zoning maps, the outcomes of the investigations will require zoning changes to implement the government’s desired densification outcomes. This will take tremendous effort from communities across Canberra to make representations to protect areas of value to them.

The Woden Flood Memorial acknowledges the loss of 7 young lives in 1971 and is of special importance to the community. It is a place that we can come to remember this tragic event and should be protected within its peaceful environment.

It should be protected within its peaceful green environment and should not be moved for high density housing.

The Yarralumla Creek should be naturalised and to create a green wildlife corridor to encourage biodiversity. Woden does not have a lake or water feature and the creek is important to slow water and bring cooling to this central corridor in the valley.



Community Facilities

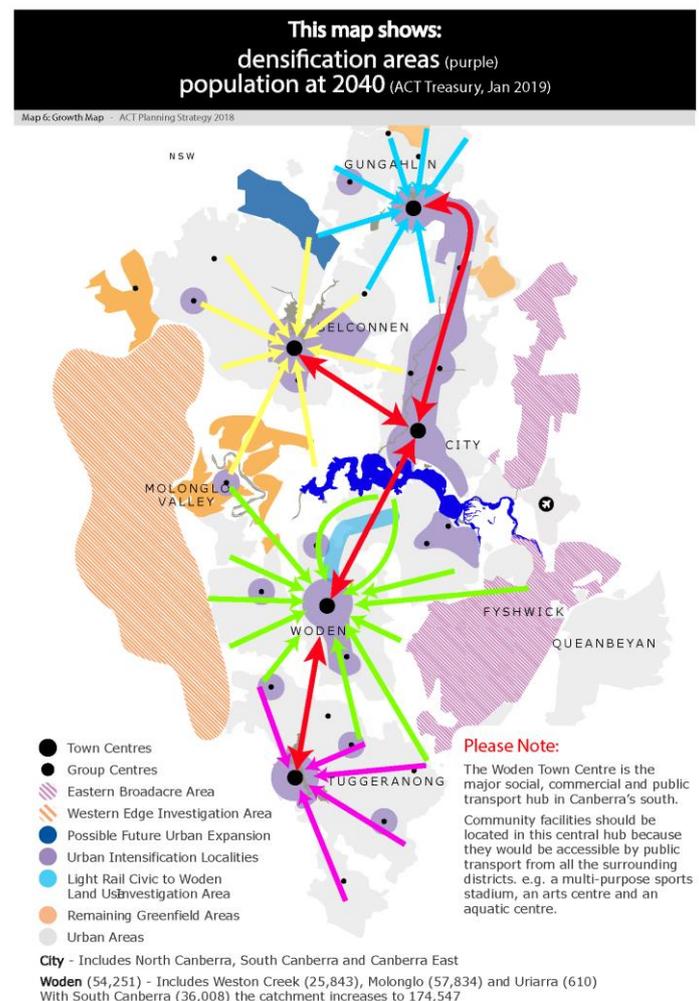
Participation in culture and recreation is good for our physical and mental health. To encourage participation facilities need to be located where they are convenient to access, on public transport corridors.

To gain the additional benefits of agglomeration and support for small business in commercial hubs, community facilities need to be located in the town centres where the buses from across the region converge.

While the Woden District Strategy mentions community facilities 43 times, sites for a multi-purpose arts centre, an indoor sports stadium, and an aquatic centre have not been included in the planning.

There is a major inequality in the location of social infrastructure in Canberra. Activity encourages more activity and without these facilities, the south is at a major disadvantage in trying to bring activity to our centres.

To reduce car use we need to be able to live work and play in our local districts.



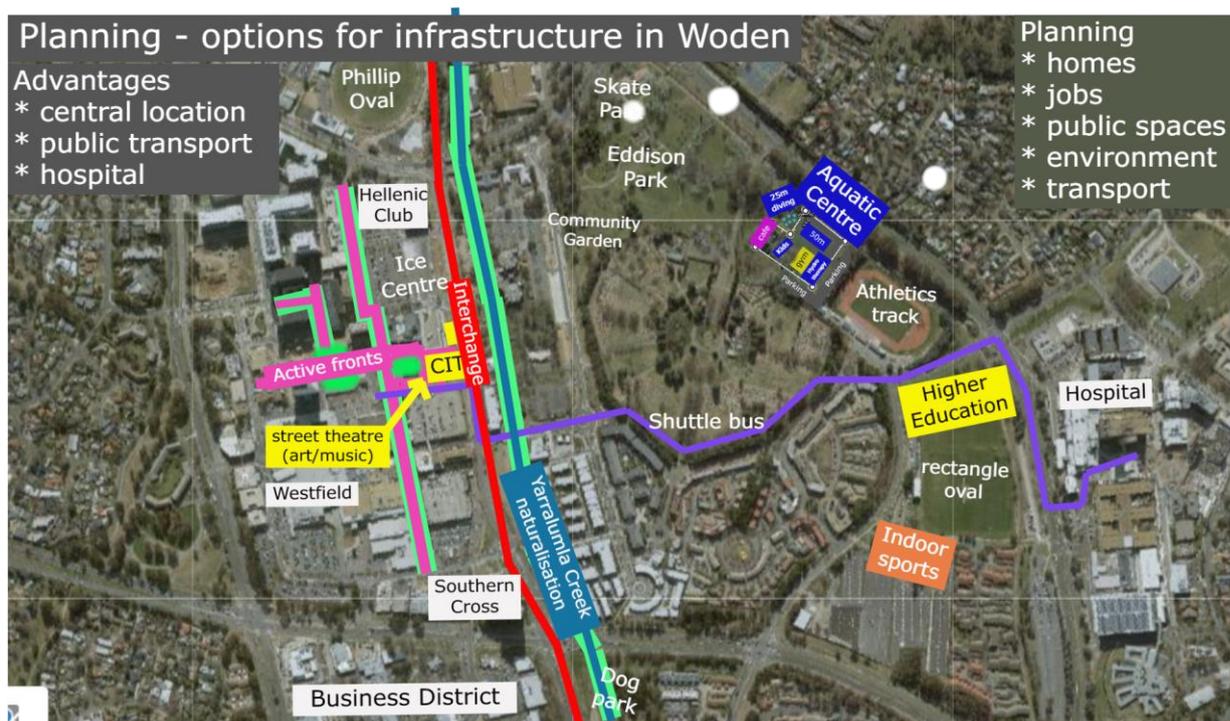
Pool

There is a huge demand for a centrally located aquatic centre. The loss of the pool and ice rink from Woden is a major blow to the social development of the Town Centre.

The proposal to include a 25m pool in a Geocon tower is second rate and will not meet the demand of all the sporting groups, squad training, lap swimmers, water aerobics, water polo, scuba diving, swimming lessons ...

An aquatic centre north of the athletic track could include a hydrotherapy pool that is near the hospital, a 25m outdoor pool and café opening up onto to Eddison Park to activate the park.

It is concerning that Minister Berry said there were no suitable sites in Woden for the new ice centre, at the same time as large government owned carparks are being sold.



Ideas for the Woden District Strategy - connect the town centre to the hospital, include an arts facility in the CIT, indoor sports stadium and aquatic centre.

Woden District Policy and Zone Policies - Development Controls

While the draft Residential Zones Policy provides some controls for site coverage, housing density, secondary residences, co-housing, number of storeys and heights, statutory controls for the following have been removed from the territory plan to guidance material:

- Consideration of area character (not just extract as much value from the block as possible)
- Height of ground floor – can it be above the fence line?
- Overlooking and privacy
- Permeable area and tree canopy

Government certifiers are required to enforce the law and access to ACAT needs to be supported with legislation for decisions to be made.

Sentences like 'development should be of a scale and nature that responds to the zone hierarchy' are too uncertain and must be changed to 'must' The word 'unless' is used 7 times in the Woden District Policy which provides opportunity for developers to not meet the development control.

Current legislation requires developments to be built within the character of the area. The Territory Plan has rules for permeable areas, tree canopy and privacy.

If current laws cannot be enforced at the DA assessment stage or by the certifier, how will the proposed outcomes based guidance stop bad outcomes?

A review of Mr Fluffy blocks should be undertaken to learn which types of developments had the best outcomes and how development controls could contribute to these outcomes.



Out of character with the area



large footprint



Overlooking invading privacy

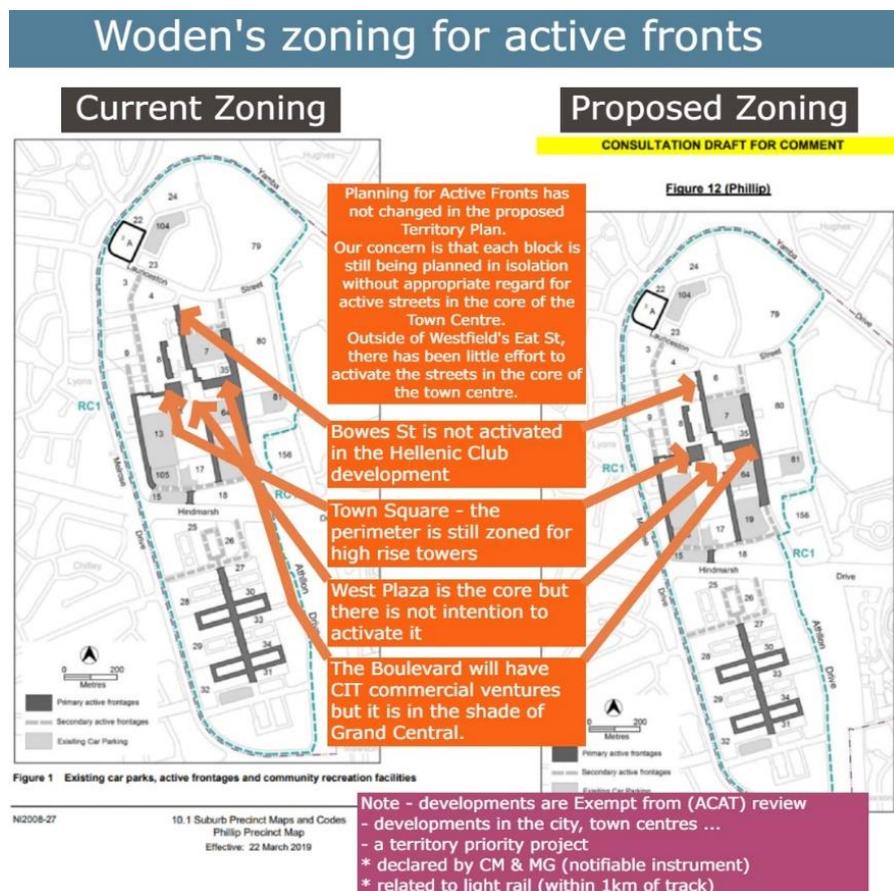
Land Use Planning – Outcomes in the Town Centre

We love the Woden Valley but to be brutally honest, the proposed Woden District Strategy is uninspiring. The anomalies in the planning and the lack of interest in fixing them to deliver a contemporary urban hub to live, work and play has led to a lack of trust in the government’s intention to deliver for the community.

2015 Woden Town Centre Master Plan - **Vision** – *the Woden town centre is a major community and commercial hub for the Woden Valley and wider Canberra region. It will be a place that attracts people to live, work, socialise and enjoy throughout the day and evenings. The town square is the central focal point for social and community activity that will connect people to a network of safe and active streets and public parks.*

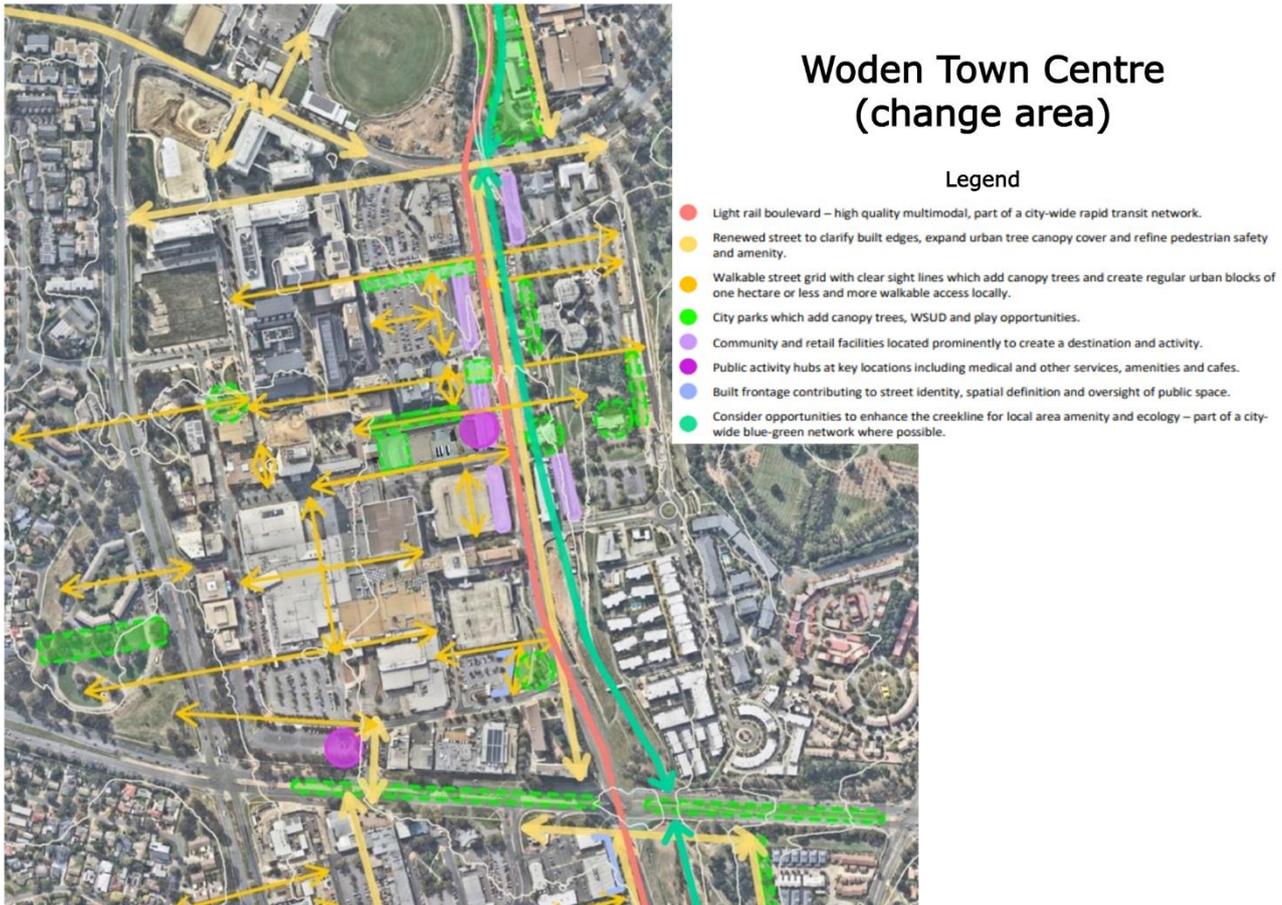
The town square is a central focal point and active streets– this requires active fronts

- the draft Woden District Strategy does not mention the Town Square
- the draft Woden District Policy fails to fix problems with the current Woden Precinct Code:
 - the current and proposed Territory Plan include a diagram of active fronts, including the town square, after 55 years, there is not one café or hospitality venue left on the perimeter of the town square.
 - the Woden town centre currently has over 30 residential towers built or in the planning process, the draft Woden District Policy failed to take the opportunity to reduce the building heights around the perimeter of the town square, leaving them at 28 storeys. Overshadowing and residents complaining about noise **will damage the future of the core of Woden.**
 - Planning should identify centrally located public spaces, allow human scale, sun and entertainment (noise).



Strangely, it appears the Woden District Strategy is moving the primary public space to the pocket park, north plaza site by the bus interchange. While it gets some sun, it is too small for events or markets and surrounding commercial activity.

With the lack of interest in the town square, the west plaza facing the Youth Foyer's blank walls and the small north plaza pocket park being next to the bus interchange – where is the primary sunny public space in the heart of Woden?



CIT – should include a multi-purpose arts facility

Unfortunately, the plans for the new CIT place the Youth Foyer (which we support but not on this site) between the CIT and the West Plaza. It has blank walls and an electrical substation and does not encourage activity and a destination in the core of Woden to provide passive surveillance and a sense of safety.

The ground floor of the CIT (opening onto West Plaza) provides a fantastic opportunity to create a space for the artists and musicians and bring creativity to the core of Woden. A meeting place for people motivated by visual and performing arts and music to create relationships and have the opportunity to collaborate and reach their goals. This facility would contribute to Revive: The Australian Government's new National Cultural Policy and the ACT Government's Statement of Ambition for the Art:

Instead, of the CIT music program being located in a space that opens up onto West Plaza to create activity, it will be on the 3rd floor and miss the opportunity to activate Woden's core.

The arts are important to a community and there is an inequitable distribution of facilities across Canberra, leaving a lack of opportunity in Woden. See Attachment B.

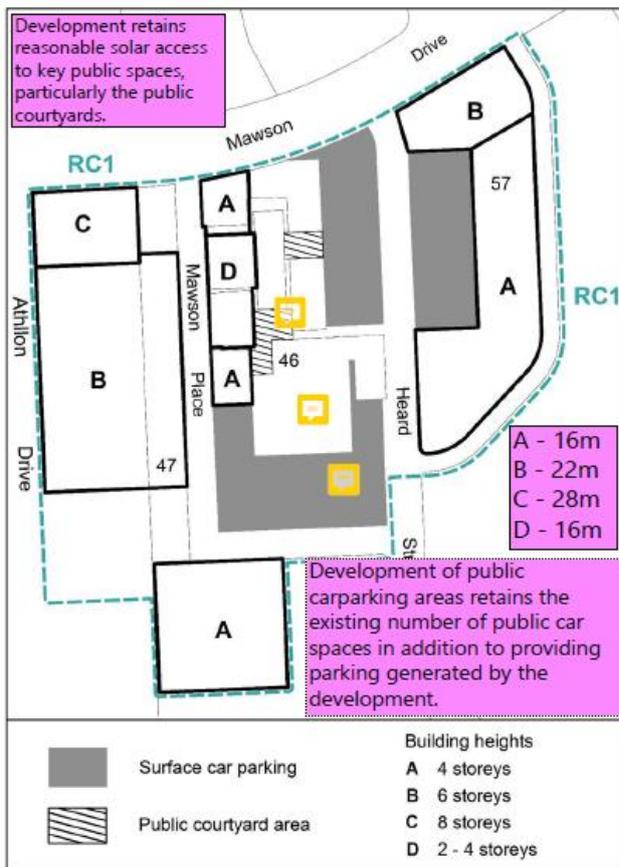


Land Use Planning – Outcomes in Curtin

See Curtin Residents Association submission

Land Use Planning – Outcomes in Southlands

Figure 7 (Mawson)

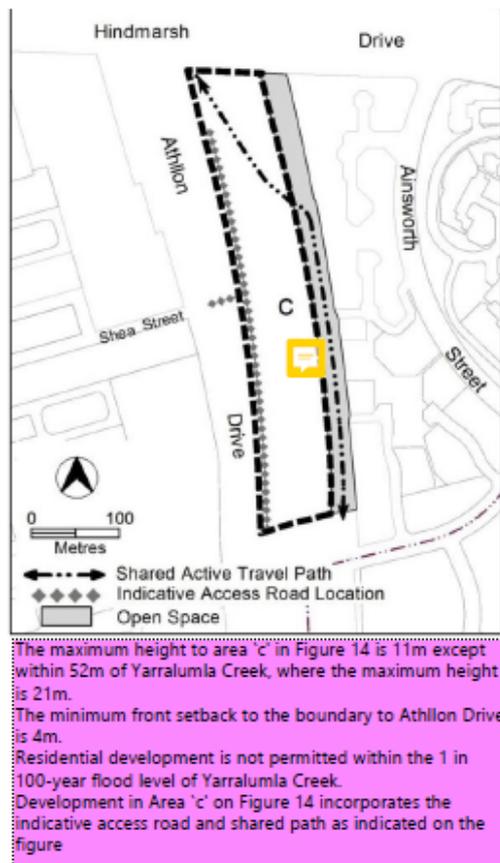


Again, there are opportunities to improve the outcomes for Southlands, Mawson.

- Reduce the building heights around the small central courtyard, keep a solar wall of 5m.
- Require Woolies to activate their side of the courtyard, at least with glass (instead of a brick wall) so activity can be seen
- Create some green space and a playground, we need to see kids playing at the shops by cafes
- Use the car park (retaining the number of carparks) between the tennis courts and Athllon Drive for a community centre and 3 x 3 basketball courts, instead of apartments
- Naturalise the creek
- Ensure car parks are accessible to the shops
- Why is there a depot on one of the car parks

Land Use Planning – Athllon Drive

Figure 14 (Phillip)



Spaces for the community to be active have not been identified in Woden 's strategy

The Athllon Drive corridor provides another opportunity to create an environmental and community corridor between Southlands and the Woden Town Centre.

Prior to land being sold for high density housing,

- a study needs to be undertaken into the environmental value of the corridor,
- the options to naturalise Yarralumla Creek, need to be investigated
- a plan needs to be developed to include the environmental outcomes, community amenity, eg a community garden and the options for an indoor multi-purpose sports stadium at the northern end of the corridor (within walking distance of the bus interchange so it is accessible from the region)

Land Use Outcomes - Phillip Service area

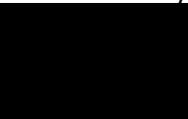
The Phillip Service Precinct has lacked investment for decades.

Having learned from the loss of the recreation precinct because it was zoned for housing, analysis needs to be undertaken to determine how housing and the service precinct can develop together. The outcomes for the precinct need to be made clear and opportunities for community facilities in this area need to be considered.

We call on the ACT Government to address the issues raised in this submission and

- improve the governance framework, and include in Part A
- improve the Woden District Strategy to include better outcomes for the people and their access to community facilities and public space in the town Centre
- move the Youth Foyer to activate West Plaza with a multi-purpose arts space
- build and own a multi-purpose indoor sports stadium and an aquatic centre in the Woden Town Centre that can be hired at a reasonable cost by local community sports groups.
- Review the Mr Fluffy blocks to determine the best development controls for great outcomes.

Yours sincerely

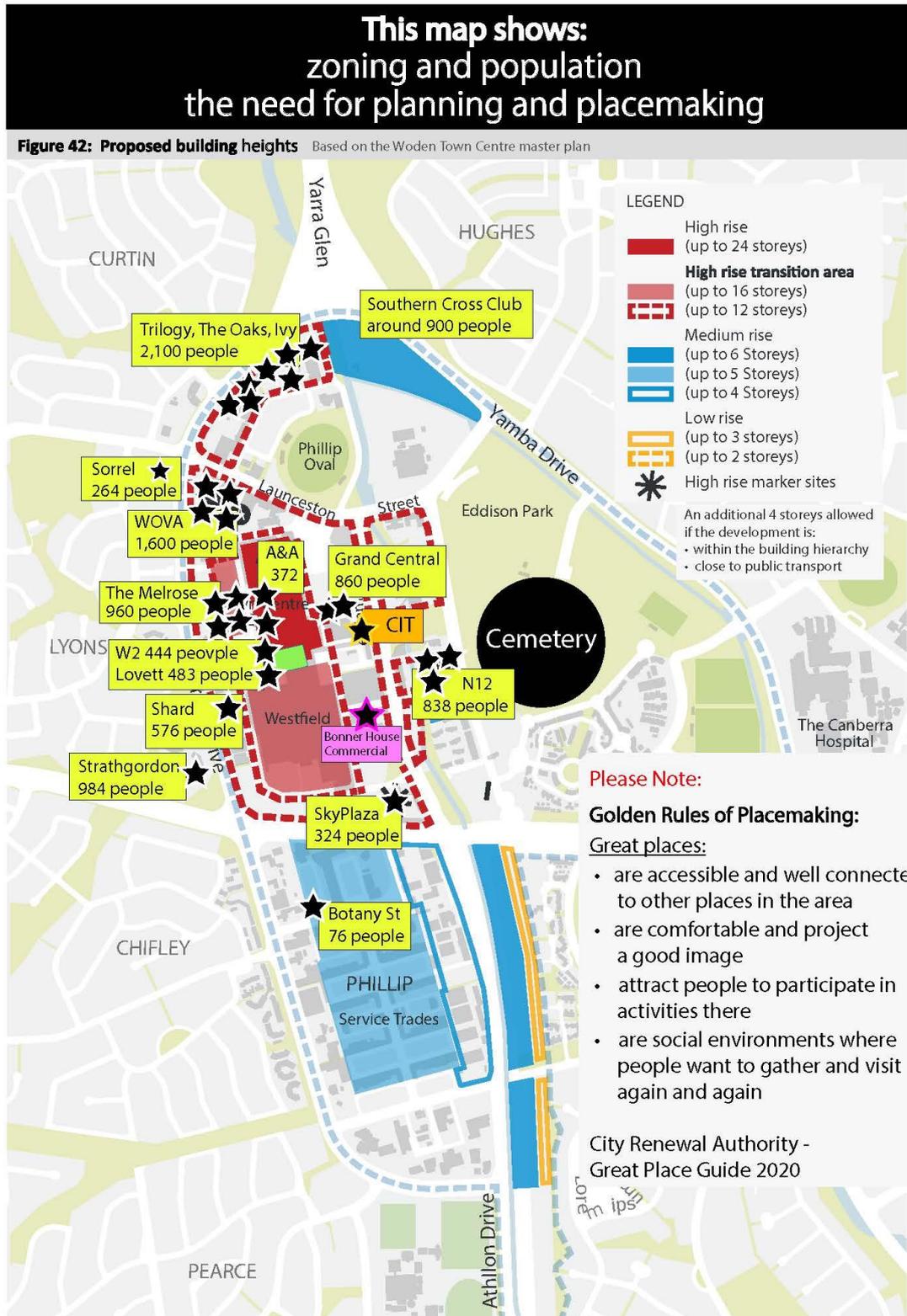


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3 March 2023

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High level of towers and densification in the town centre



The towers will home over 10,000 people (assume 2 people per apartment)

- given the zoning, the potential population could be significantly higher.
- placemaking will need to be planned and delivered.

Location of indoor sports facilities showing the inequitable distribution across Canberra

