

3 March 2023



Draft new Territory Plan and District Strategies

We welcome the opportunity to provide the following comments.

By way of background we have lived in Curtin for more than 20 years. In 2019 we moved into our third Curtin home - a new build on a Fluffy block in the Radburn area.

Curtin Square

A critical factor in the success of the Curtin Centre development was the incorporation of sensible solar protection, including the 5m solar fence, for Curtin Square in the Territory Plan in 2018.

We are concerned the proposed Territory Plan significantly reduces these protections. We strongly recommend the 2018 solar protections be included in the Woden District Policy section of the new Plan.

More dwellings

We support increasing the number of dwellings in Curtin so long as it's undertaken sensibly to maintain the suburb's character and liveability such as mandating adequate tree canopy cover on private (and public) land.

We would be concerned, however, if the new Territory Plan allowed RZ1 blocks to be subdivided to less than 400 sqm and building heights over 2 storeys.

Yarralumla Creek corridor

We use the Yarralumla Creek corridor walking paths on most days. We strongly oppose proposals (e.g. the edge street, street(s) crossing the creek) that would reduce green space and the number of trees.

Protection of the Radburn area

As (biased) residents we believe the Radburn area has so much potential and strongly support the decision to maintain and improve the area's housing pattern.

Development of the Yarra Glen / Melrose roundabout

We consider the proposal to develop retail and community facilities in the middle of the roundabout is the silliest idea and totally impractical.

I am a Deakin resident and am writing to oppose the Inner South District Strategy's proposal for high density, high rise, densification of Yarralumla and Deakin.

As a community member deeply concerned by our current climate crisis, the infill of green spaces in order to support a fixed infrastructure public transport system is absurd.

The scale of the proposed change is excessive. Up to sixty percent of Yarralumla and Deakin would become three to six storey apartment blocks. The proposed densification and redevelopment requires large-scale procurement and demolition of the existing built environment and large-scale loss of public open space. It will destroy the heritage, liveability, and character of two of Canberra's oldest suburbs. Canberra was deigned to be a garden city. In fact it is the current character of Deakin and Yarralumla which encouraged our family to move from Sydney to Canberra 3 years ago.

The Inner South District Strategy is environmentally unsound and will result in a loss of species and habitat. The planned densification and urbanisation will destroy most of the green spaces and tree cover in Yarralumla and Deakin and result in rising temperatures. In an era of climate change we should be increasing tree planting and maintaining shade trees, not filling up green spaces with multi-storey concrete bunkers. Further, the Inner South District Strategy contradicts the Urban Forest Strategy 2021 and Urban Forest Bill 2022, which set the target for 30% tree canopy coverage in the Territory's urban areas.

I am particularly concerned by the lack of transparency in the Inner South District Strategy and the lack of consultation with the community. The views of residents have not been genuinely considered. Such a dramatic change requires proper community consultation and engagement. Many residents are unaware of these proposed changes, and community consultation has not met good practice.

If the *Planning Bill 2022* is passed, it will formally lock into the Territory Plan both the District Strategies densification, and the target of 70% of new housing to be in existing urban areas. Such inflexibility should not be enshrined in the statutory planning framework. It is unsound legislative practice, precludes changes in policy and prevents the opportunity to respond and adapt to changing circumstances.

DRAFT TERRITORY PLAN

SUBMISSION: [REDACTED]

NEW PLANNING ARRANGEMENTS: DA DECISION MAKING

In Summary:

The move to an ‘outcomes focussed’ planning system involves

- **Major deregulation of residential development, with DAs to be assessed against broad, subjective outcome measures**
- **Most current rules have been dropped, and DAs will not be assessed against them**
- **Assessment against broad outcome measures is not a good basis for consistent, transparent decision-making**
- **Most current rules will be placed in a ‘Technical Specifications’ document; which can be changed by ACTPLA as it wishes. It is proposed to use this document on a ‘deemed to satisfy’ basis.**
- **Getting rid of the rules will remove the protections residents rely on to ensure that developments do not destroy their amenity, or the character of their suburb.**

The proposed arrangements not only give ACTPA wide discretion to decide on DAs, but also to change, as they see fit, the specifications for ‘deemed to satisfy’ assessments, and other assessment requirements

- **This ignores the Legislative Assembly’s oversight role.**
- **ACTPLA will be under constant pressure from the industry to water down the requirements**

Measures which are essential to improve the proposed arrangements include

- **Adopting tighter definitions of desired outcomes, based on verifiable evidence and objective tests of compliance**
- **Adopting additional mandatory ‘Assessment Requirements’, covering current V369 Living Infrastructure provisions and other key protections of privacy and solar access**
- **Technical Specifications to form part of the Territory Plan, to allow for Assembly oversight, and changes be regarded a major amendment to the Plan.**

Deregulation of residential development

The key change in the move to an 'outcomes focussed' approach is to drop most current rules from the Territory Plan.

Part E1 Residential Zones Policy of the proposed Territory Plan sets out 'Assessment Requirements' ie, mandatory controls, for the various residential zones. These cover, for RZ1 and RZ2

- Site coverage
- Density and minimum block sizes for multi- unit housing
- Number of storeys
- No apartments in RZ1.

Technical Specifications

Rules other than those retained as 'Assessment Requirements' above have been removed to a document titled 'Technical Specifications, November 2022'. These cover

- Development and site controls (setbacks, private open space)
- Height, bulk and scale (incl solar access)
- Environment & heritage (incl tree planting)
- Amenity, safety and accessibility (incl privacy)
- Transport, parking and movement
- Services and utilities.

The Technical Specifications document does not form part of the Territory Plan, and, to be approved, a development does not have to be assessed against them. Rather, it is proposed that they operate on a 'deemed to satisfy' basis:

*'Where a proposed development complies with a relevant provision in the technical specifications and the technical specification comprehensively addresses the outcome, **further assessment regarding those specific provisions will not be required**' (TP partD4)*

A problem with this approach is that the Technical Specifications document is not part of the Territory Plan. It can be amended by ACTPA without reference to the Assembly (or indeed anyone.)

This means that ACTPLA can change the basis by which a DA is deemed to comply, and will certainly be under pressure from industry to water down the specifications.

The proposed Planning Act (s49 (2)) provides that:

the Territory Plan may be supported by background material, guides, advisory notes or anything else (the supporting material) that the territory planning authority considers will help readers to understand and apply the Territory Plan

To use 'supporting material' as a basis for decision making on Development Applications is dubious, and may raise 'error of law' issues. To remove any doubt, if it is desired to have the Technical Specifications operate on a deemed to satisfy basis, then they should be included in the Territory Plan, to ensure Assembly oversight. Also, the proposed Planning Act must explicitly allow for this use.

Case study: Variation 369: Living Infrastructure

Variation 369 to the existing Territory Plan came into effect on 1 September 2022, and introduced new rules covering minimum levels of private open space and planting areas, and minimum levels of tree plantings across developments in RZ zones. These rules have been incorporated into the relevant codes (Single Dwelling, Multi Unit) in the current Territory Plan.

In the proposed new planning arrangements, the contents of V369 have been incorporated into the Technical Specifications document.

This means that, when the new arrangements are in place, the V369 provisions will not apply. A DA will not have to address them, and will not be assessed against them.

They are only relevant if a developer decides to comply with the Technical Specifications on a 'deemed to satisfy' basis.

Basically, a development will not have to comply with the content of V369 unless the developer chooses to do so.

Decision Making

Under the proposed Act, a decision on a DA must consider, inter alia, 'any applicable desired outcome in the territory plan.'

On the face of it, focussing on desired policy outcomes has some logic, by bringing broader considerations to bear.

The problem is that all of these statements are qualitative, broad in nature and not measurable. Their interpretation when applied to decision -making on a specific DA therefore involves subjective judgement.

They are not a good basis for consistent, transparent decision-making.

In fact, they will, in practice, be unworkable.

By comparison, current arrangements require developments be consistent with the relevant code in the Territory Plan, and assessment against the code's rules and criteria. Assessment against a broader range of desired outcomes, rather than against the more specific rules and criteria, will be more open to differing interpretations.

The use of broader, qualitative outcome criteria gives ACTPLA enormous discretion to approve applications.

Over time, court rulings may provide some clarification, but court appeals are only likely from proponents appealing against rejection of a DA. It may become difficult for ACTPLA to reject a DA.

Getting rid of the rules will remove the protections residents rely on to ensure that developments do not destroy their amenity, or the character of their suburb.

Necessary Action

Tighten the ‘desirable outcomes’ measures

The Development Assessment Forum, in 2005, developed a leading practice model for Development Assessment in Australia. It indicated

Clear requirements and criteria for submitting and assessing an application should be available at the outset to ensure appropriate outcomes.

Clear policy statements enable the formulation of objective rules and tests, which are essential for efficient and consistent decision-making.

Technically excellent criteria are based on appropriate, relevant, verifiable evidence and lead to objective tests of compliance.

(A leading practice model for Development Assessment in Australia, Development Assessment Forum, 2005)

A simple example of an objective, measurable ‘desired outcome’ would be that any development had to preserve the solar access of neighbouring properties. ‘Solar access’ is easily defined (certain hours of access in midwinter, etc). How the proposed development achieved this would be up to the proponent, rather than, as currently, conforming to rules about setback, building bulk. Such an approach would provide flexibility for innovation, while preserving a desired outcome of solar access.

If the government is serious about ‘outcomes focused planning’, it needs to rework the objectives to make them objectives, and measurable. Otherwise the system will be unworkable,.

Retain key existing rules

In some instances it may not be possible to articulate an objective outcome measure. For example, the current Living Infrastructure measures have outcomes relating to canopy cover after 20 years. Due to this time lag, it is impossible to articulate as an outcome that can be assessed at the time of application, and so such measures need to be expressed as rules governing tree planting and open space. In the current context, this would mean adding these

rules to the mandatory 'Assessment Requirements' in the proposed Territory Plan.

Also, some measures, such as privacy, solar access and protection of the character of heritage precincts may be seen as so sensitive and likely to generate conflict that they should be made mandatory Assessment Requirements.

If the outcome measures are not reworked to be made more objective and measurable, then it would be necessary to incorporate additional Assessment Requirements into the Territory Plan.

Submission on Woden District Plan.

Provided by [REDACTED]

[REDACTED]

BEGIN SUBMISSION

1. I write to provide a submission relating to the Draft Woden District Plan.
2. In developing this submission I have had regard to the Plan Summary and the long form of the plan.
3. I have attended the Woden district listening hub at the Abode Hotel in Woden on February 24, and participated in the Planning Reform Q and A session online on February 23rd.
4. On page 119 and 120 of the long form Plan there is a series of plan initiatives involving the Curtin Horse Paddocks and relating to an 'Edge Road' through the Curtin Green Corridor that borders Yarralumla Creek.
5. The Horse Paddock section includes reference to additional access roads through the green space and/ or adjacent to Yarralumla creek.
6. The Edge Road proposal also includes a number further potential access roads through existing streets in Curtin.
7. These initiatives all involve a very significant impact upon the Green Space. Yet in the District Plan, on page 27 the Plan denotes that community feedback has already been received, in 2021, to the effect that it was necessary to: *"Protect and Activate reserves and green corridors, particularly in areas of housing density."*
8. This green corridor is extensively utilised by residents in Curtin. The corridor supports a range of recreation, pedestrian and bicycle transport activities. The corridor also supports extensive pedestrian and bicycle transport across Canberra. As the current infrastructure is dedicated to bicycle and pedestrian access it is an important open space for people with children and for those who live with mobility restrictions.
9. The corridor provides an essential buffer from vehicle noise and pollution from Yarra Glen.
10. The values and amenity of the suburb will be significantly negatively impacted by the reduction of and changed purpose of the green space.
11. The consultation process has been inadequate. I only became aware of the proposals in conversation with neighbours. Despite participation in the Q and A and attendance at the listening hub, the precise nature of the proposals on page 119 and 120 were only identifiable in the long form of the 160+ page plan. It seems most likely that there is absolutely minimal awareness of these proposals within the suburb. I submit that it is unreasonable to proceed with such significant change without very specific community level awareness of the plan.

12. The reason advanced for the Edge Road proposal in the plan is to “...clarify the Urban Edge to Yarra Glen.’ Clearly this is an asinine statement not worthy of any serious consideration. I can only emphasise that the urban edge is already well defined as there is a very large Road, a Creek with a largely modified water course, and then a strip of Green Space. No one is in any doubt as to the ‘Urban edge’.
13. Unhelpfully, the plan does not define the concept of an ‘Edge Road’ in the Glossary. One speculation that has come to my attention is that an Edge Road supports emergency vehicle access. The Green Space is currently accessed as required by any and all ACT Government/Contractor Vehicles, without any obstructions or problems whatsoever. Just in February 2023 the ACT Government deployed contractors for very significant repairs to the concrete channel bordering Yarralumla Creek and no problems of vehicle access were noticed. There are multiple access points to the green space along the entire length of the Yarralumla creek corridor.
14. The maps provided across the plan documents and in particular on pages 119 and 120 are of absolutely lamentable quality. It is impossible to imagine a sufficient reasoning for the provision of such poor resolution maps. Without high definition maps, complete with street names and other identifying location tags, it is impossible to consider the plans at any reasonable level of detail.

Summary: the plans have been poorly consulted, poorly documented and visualised and will result in damaging impact to the green space. Despite previously recording community feedback to the issue of the need to preserve the green space the strategy is proposing to negatively impact a green space used by hundreds of people, every day, for pollution free transport and recreation.

I submit that the plans denoted in this submission are completely inappropriate for the area and have not been brought forward under reasonable process. It is my intention to oppose these elements of the plan at every possible opportunity.



March 2, 2023

References:

Long Form of the Draft Woden District Strategy:

chrome-extension://gphandlahdpffmccakmbngmbjnjiiahp/https://hdp-au-prod-app-act-yoursay-files.s3.ap-southeast-2.amazonaws.com/1916/6848/3105/Draft_Woden_District_Strategy_-_08.11.22.pdf

Extract from Long Form Strategy;

Page 27/162 Feedback from the Community - All Districts 2021:

'Open Green Space

Protect and Activate reserves and green corridors, particularly in areas of housing density.'

END SUBMISSION.

Submission re the New ACT Territory Plan

I congratulate and support individuals and groups who have, voluntarily, devoted countless hours to reading the documentation and writing submissions on the New Territory Plan. Especially those who have made representations in order to protect the territory's natural areas, flora and fauna, such as the Conservation Council of the ACT and Region.

ACT citizens are calling for greater protection of reserved, gazetted and all open space areas near their homes through the Territory Plan.

I do not support there being a New ACT Territory Plan until its proponents can demonstrate and explain to far greater numbers of ACT citizens that:

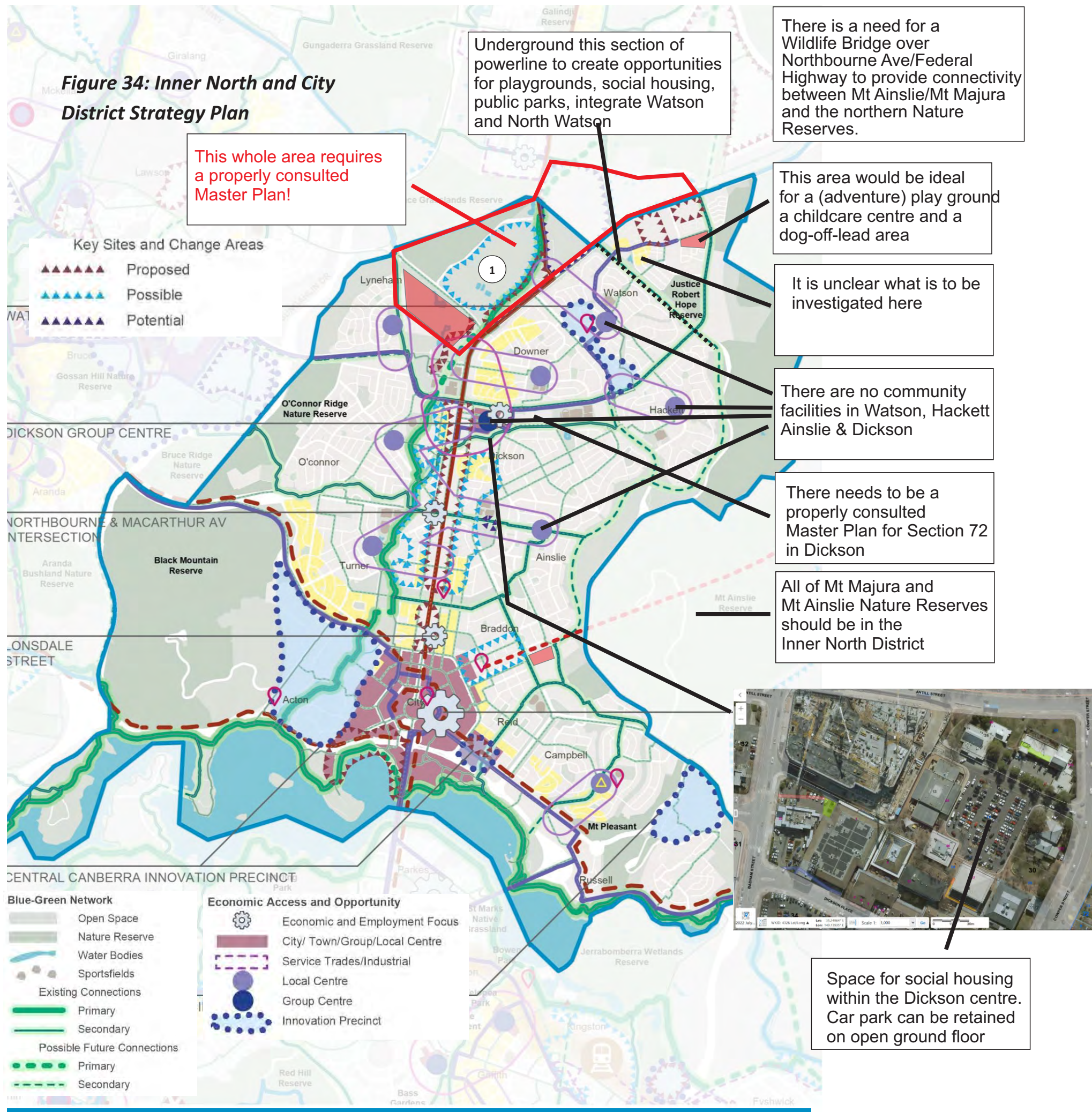
- The impetus for changing the TP has come from individuals, communities both here and Australia wide. Changing the TP has consequences for Canberra as the National Capital. Who has deemed a new TP to be necessary?
- In devising the new TP, there have been comprehensive consultations with acknowledged experts, researchers, city planners Australia-wide through an Independent Planning Commission.
- Meteorological and climate advice has shown that Canberra, as an inland city, has sufficient future rainfall and snowfall to provide water for the 600,000 people living here soon and in the next decades.
- The Y-Plan which is the basis of Canberra's visionary design will not be compromised by infill development along transport axes that exacerbate the heat-island effect, making suburbs unliveable.
- The new TP prevents the further loss of ambience in the suburbs, the loss of heritage buildings and ancient trees and makes the most of what we have rather than constantly building new cement and asphalted spaces.
- Aren't villages with relevant amenities, the preferred and decentralised communities of the future?
- The proponents have considered the recently-changed employment dynamics and work-life balance where more people are working from home and not requiring office-space in cities.
- More people can be accommodated in the ACT without the loss of further agricultural land (CSIRO), without destroying nature reserves (Lawson & Bluetts Block), open space (Curtin Horse Paddocks), manipulating iconic sites (West Basin) and intra-suburban open spaces. And without enticing people to live in known bushfire and embers-risk zones.
- ACT Treasury's income from land sales relates to there being insufficient funding for the maintenance of Canberra, as the national capital, from the Commonwealth government. Other countries provide much higher levels of support for their capitals than does Australia. This income is especially necessary for the upkeep and enhancement of the bush capital's unique natural areas.

The new ACT Territory Plan has been developed over several years but I and others question who will derive the most benefit from its implementation and whether the proponents have considered the Plan's consequences?

[REDACTED]
[REDACTED]
[REDACTED]

02.03.23.

Major issues: (1) This district plan does not contain a needs analysis for Schools, Childcare, Playgrounds, Adventure playgrounds, Dog-off-lead parks, a Northside Hospital and Social/Supportive Housing. (2) It does not contain sufficient detail to be properly consulted on the local level of suburbs. (3) District Plans should be living documents and be provided as an overlay on ACTMapi.



All elements of district strategies should be subservient to Biodiversity Network principles (see <https://conservationcouncil.org.au/blog/2023/01/13/a-biodiversity-network-for-the-act/>)

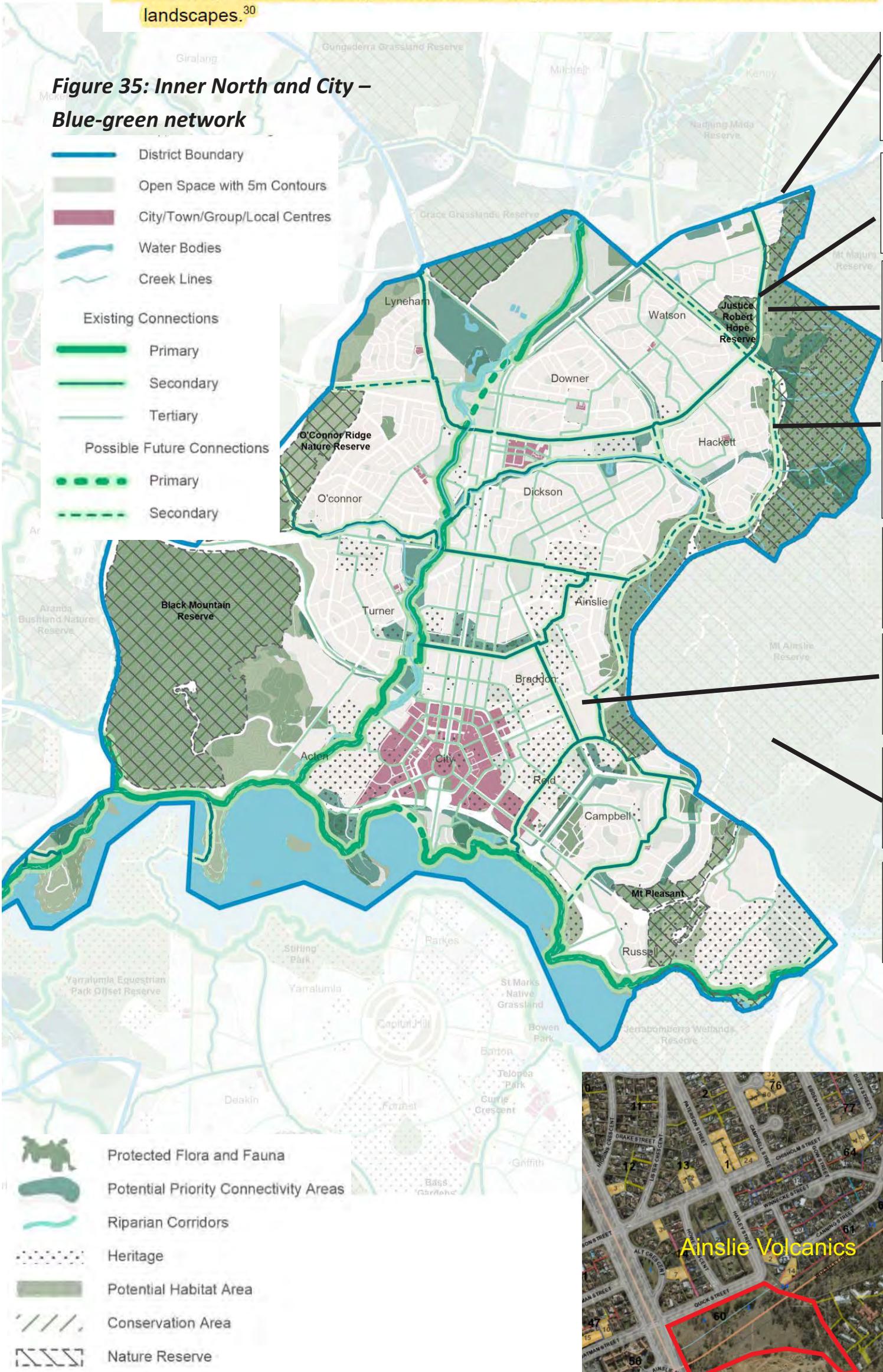
of natural values in the ACT. A Biodiversity Network would be designed to protect remnants of natural value that are not reserved, whereby these remnants, together with those in reserve, will be unified into a single management and (or) legal framework for protection and implementation of ecological management.

While nature reserves and national parks are important in that they provide a high level of protection against damage and loss, conservation (protection and management) can be achieved across other land tenures, without compromising the land uses that may exist in those places.

The aims of the Biodiversity Network are to formalise conservation and management of biodiversity outcomes on multiple types of public and leased land by identifying them as Conservation Areas, through a combination of protection, restoration and reconnection compatible with other land management objectives. A Biodiversity Network would achieve this

All elements of district strategies should be subservient to Biodiversity Network principles (see <https://conservationcouncil.org.au/blog/2023/01/13/a-biodiversity-network-for-the-act/>)

- A. Protection in perpetuity of key biodiversity areas linked across the landscape;
- B. Implementation of consistent and best practice ecological management;
- C. Conserving important ecosystems, habitats and wildlife corridors;
- D. Supporting the recovery of threatened species;
- E. Maintaining ecosystem functions and securing ecosystem services;
- F. Enhancing resilience against threats; and
- G. Retaining and connecting remnants of fragmented ecosystems within developed landscapes.³⁰



There is a BIG problem with connectivity between Mt Majura Nature Reserve and the Nadjung Mada 'off-set' area. There would be a need for a land bridge over the federal highway

This stretch of Antill St is NOT a 'primary existing green connection'. It's rather deadly, actually

Sections 75,85,86 need to be rezoned and incorporated into Mt Majura Nature Reserve

Not clear what this 'future primary connection' means. It runs through fire protection areas and along service roads & power lines.

Include urban parks in 'potential habitat areas'

Incorporate the Ainslie Volcanics site into Canberra Nature Park

All of Mt Majura and Mt Ainslie Nature Reserves should be in the Inner North District

Why are Mt Majura and Ainslie 'Heritage' and Black Mountain and O'Connor Ridge not?

From: [REDACTED]
To: [EPSDD Communications](#)
Subject: Website enquiry - Regarding proposed changes to Curtin - New Edge Street
Date: Sunday, 5 March 2023 9:37:02 AM

[You don't often get email from [REDACTED]. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

Caution: This email originated from outside of the ACT Government. Do not click links or open attachments unless you recognise the sender and know the content is safe. Learn why this is important<<http://www.act.gov.au/emailsecurity>>

As we do not trawl your website regularly we were not aware of the plans to redevelop our green space and construct a 'New Edge Street'.

We would like to register our strong objection as a resident to this proposal. We have missed the cut off date by 2 days for your consultation period - again which was not sufficiently promulgated or advised to residents which we believe is dishonest.

As a resident of Curtin who has already been affected by 'Mr Fluffy' we remain highly disappointed with this decision and the lack of care for which you show the electorate for whom you are supposed to be working for.

We use this green space everyday and it was the reason, despite having to sell our home to the government (Mr Fluffy), we re-bought and invested in Curtin.

Removing this green space means my children no longer can daily walk to friends homes and the oval or exercise our dog in a safe space without cars. It will also greatly affect the value proposition for living in Curtin given green space will be replaced by concrete and heat up our environment.

We would appreciate if you could include this submission with others protesting this proposal.

[REDACTED]

From: [REDACTED]
To: [FPSDD Communications](#)
Subject: Last plot left in Coombs
Date: Monday, 6 March 2023 2:46:17 PM

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

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[Learn why this is important](#)

Hi

I know its late but this has just been brought to all the dogs owners in the valley. The only oval in the valley is not marked off leash oval and now access is denied except for out of school hours.

The mixed use plot that is left right behind the coombs oval would be perfect for a dog park. This means that owners can access the park even through school time and the only oval in the valley currently will be free of dogs.

Please consider this idea as dogs currently dont have a safe off leash area that is in the valley other then the coombs oval which is taken over by the school and public use.

Their is no marked off leash area in Coombs or denman prospect and Whitlem.

Kind Regards

[REDACTED]

From: [REDACTED]
To: [EPSDD Communications](#)
Subject: Re: YourSay enquiry
Date: Tuesday, 7 March 2023 10:14:42 PM
Attachments: [Submission re Housing Choices - Final 24 Jan 18.pdf](#)

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[Learn why this is important](#)

Many thanks, [REDACTED]

Submission in relation to proposed new Territory Plan

To whom it may concern

Thank you for the opportunity to comment in relation to the ACT Government's proposed new planning system, including changes to the Territory Plan.

We write to express our strong support for changes to allow a diversity of housing types by amending current restrictions on the construction and renovation of dual occupancy housing.

We are the home owners and occupiers of an existing unit titled dual occupancy dwelling in an RZ1 zone (Narrabundah). We have a three bedroom, one bathroom home on a large block of over 500 m2, and would love to extend to suit our growing family, however we are unable to do this as under the current formula our plot ratio is under 30%.

In our submission, there is a strong case for increasing the maximum plot ratio applying to dual occupancies, including in RZ1. This change would increase the viability of dual occupancy developments and support a greater mix of housing within established suburbs. Crucially, it would also let home owners such as ourselves remain within established suburbs, as it would allow us to make modest extensions to our homes in order to accommodate new family members without the need for relocation. This is especially so as house price increases in recent years mean that younger families such as ours are now priced out of purchasing larger homes in many established suburbs.

This change would mean that our children could continue to develop their social networks and remain in their existing school, and that we could remain in the suburb we enjoy and have lived in for many years.

I have attached a previous submission we lodged in response to the Housing Choices Discussion Paper in 2018 which addresses these issues and the anomalies in the current system.

Kind regards

[REDACTED]

On Tue, 7 Mar 2023 at 12:40, EPSDD_Communications <EPSDDComms@act.gov.au> wrote:

OFFICIAL

Hi [REDACTED]

Please send across your submission in reply to this email and I will forward it onto the policy team.

Thanks,

[REDACTED]

From: [REDACTED]

Sent: Monday, 6 March 2023 1:15 PM

To: EPSDD_Communications <EPSDDComms@act.gov.au>

Subject: YourSay enquiry

Caution: This email originated from outside of the ACT Government. Do not click links or open attachments unless you recognise the sender and know the content is safe. [Learn why this is important](#)

Good afternoon, is it possible to make a late submission in relation to the dual occupancy changes? We live in a dual occupancy in Narrabundah and are very supportive of proposed plot ratio changes. Kind regards, [REDACTED]

This email, and any attachments, may be confidential and also privileged. If you are not the intended recipient, please notify the sender and delete all copies of this transmission along with any attachments immediately. You should not copy or use it for any purpose, nor disclose its contents to any other person.

SUBMISSION – HOUSING CHOICES DISCUSSION PAPER

Lodged by email to: terrplan@act.gov.au

Thank you for the opportunity to respond to the November 2017 *Housing Choices Discussion Paper* (the Paper). We are the home owners and occupiers of an existing unit titled dual occupancy dwelling in an RZ1 zone. Our comments relate to section 4 *How do we improve housing choice?*, specifically sub-section 4.11 *Residential RZ1 suburban zone*.

Note: In this submission, where we refer to ‘dual occupancies’ we are referring to dual occupancies that have been unit titled.

The need for greater diversity of housing options

The Paper is based on the premise that there is a need for greater diversity of housing options within established suburbs, including to:

1. promote a more compact city while maintaining the character and amenity of Canberra’s suburbs, and
2. provide affordable housing within established suburbs and facilitate the desire of Canberrans to stay in their neighbourhoods as they age.

We agree with these objectives which – as the Paper notes – are being driven by both younger and older generations.

Our comments are also made in the context of the Australian Capital Territory’s (ACT) finite land holdings and disproportionately high ecological footprint.

Potential changes to RZ1 dual occupancy developments

The Paper notes that the majority of residents would like more dual occupancies, with a strong preference for separate unit titles. In our view allowing new dual occupancies to be unit titled would be a sensible way to increase housing diversity within established suburbs. We acknowledge that there should be some restrictions on this to appropriately balance the need for higher density living with the desire to maintain the character of each neighbourhood. The Paper’s suggestion that this could be achieved by defining those blocks that are suitable for dual occupancy developments i.e. restricting dual occupancy developments to larger blocks – including corner blocks with a minimum street frontage – is one viable option.

Unfortunately, this change alone would not be enough to achieve the ACT Government’s objectives, largely because of the unique and problematic formula currently used to calculate the maximum plot ratio of dual occupancies in RZ1. The formula (and the rules around plot ratios for dual occupancies within RZ1 more generally):

1. unduly restricts dual occupancy developments – preventing the flexibility necessary to promote a more compact city that allows for each suburb’s changing demographic
2. is inconsistent with maintaining the character of Canberra’s suburbs
3. has no apparent policy objective and has previously been found to ‘lack logic’, and
4. gives rise to a number of anomalies that discourage the development of dual occupancies.

The problem – RZ1 dual occupancy maximum plot ratio formula

At present, the maximum plot ratio for dual occupancy developments in RZ1 is calculated by reference to a formula, set out in Part 3.4 of the Territory Plan, being the *Multi Unit Housing Development Code*.

Rule 3.2 provides that for dual occupancy single dwelling blocks in RZ1 (except for surrendered blocks), the maximum plot ratio is determined by the formula:

$$P = (140/B + 0.15) \times 100, \text{ where:}$$

P = maximum permissible plot ratio expressed as a percentage, and

B = block area in square metres.

To give an example of how this formula works in practice, the applicable plot ratio for various block sizes – noting that a ‘block’ refers to the combined land area of both dual occupancy dwellings in a development – is as follows:

Block size	Current plot ratio
800m ²	32.5%
900m ²	30.6%
1000m ²	29.0%
1100m ²	27.7%
1200m ²	26.7%

There is no allowance for a degree of discretion, or for the consideration of individual circumstances – this is a mandatory requirement. The plot ratio determined by the formula will apply even if the block is subsequently subdivided.

1. Undue restriction on development – comparable maximum plot ratios

According to the Paper, the average urban block size in Canberra’s suburbs is now 835m². In an RZ1 suburb, a block this size would have a maximum plot ratio of 31.7%. In established suburbs where blocks tend to be larger, the plot ratio is likely to be closer to 30% or lower. As such, we use the indicative figure of 30% for the remainder of this submission.

To provide an illustration of how this plot ratio compares to other plot ratios in the Code, we note that:

- the plot ratio for surrendered dual occupancy blocks in RZ1 is **50%**
 - Rule 3.3 of the *Multi Unit Housing Development Code* provides that the maximum plot ratio for surrendered dual occupancy single dwelling blocks in RZ1, other than where at least one dwelling does not front a public road, is 50%.
- the plot ratio for single occupancy dwellings in RZ1 is **50%**, and
 - Rule 1.1 of the *Single Unit Housing Development Code* provides that large single dwelling blocks have a maximum plot ratio of up to 50%. A large block is defined as one with an area greater than 500 m².
- the plot ratio for dual occupancy blocks in RZ2 is **50%**.

- Rule 3.3 of the *Multi Unit Housing Development Code* also provides that the maximum plot ratio for dual occupancy single dwelling blocks in RZ2, other than where at least one dwelling does not front a public road, is 50%.

As per the above, the RZ1 dual occupancy plot ratio set out in the Territory Plan is substantially lower than other comparable plot ratios.

This is the case even where one or more of the dual occupancies are on a 'large block' – being an area greater than 500m².

The impact of the low plot ratio is that the current formula does not permit the development of a small family home. For example, in the case of our dual occupancy, our dwelling is located on an area that would otherwise constitute a large block and has a maximum permissible plot ratio of 29.7%. Assuming that the plot ratio is distributed between the two dwellings on a pro-rata basis (the problems with this assumption are discussed below), the maximum permissible plot ratio of our dwelling is approximately 160m². The average home in Canberra, however, is between 250 to 300m² – being up to approximately double the maximum permissible development.

This appears inconsistent with the objectives of promoting a more compact city. Further, the limited plot ratio prevents dual occupancy dwellings being extended as the occupants' families grow.

This is an illustration of how the present planning system limits the economic feasibility of developing multi-unit housing in existing residential areas – an issue of concern identified by the Paper.

2. The formula is inconsistent with maintaining the character of Canberra's suburbs

The formula has the result that the larger a block, the smaller the permissible plot ratio.

This allows and promotes greater development of smaller blocks, and unduly restricts, and therefore discourages, the development of larger blocks.

This consequence appears to be inconsistent with maintaining the character of Canberra's suburbs, maintaining the general character of Canberra as a 'garden city', and promoting a more compact city.

Larger blocks offer greater potential for dual occupancy developments that are consistent with maintaining green spaces and the general aesthetic of a neighbourhood. The objective of a compact city is more efficiently and effectively achieved by the development of larger blocks.

3. Perverse outcome – no apparent policy justification for the formula

On its face, the application of the formula is perverse. The more suitable a block – the less the scope for dual occupancy development.

A policy justification for the formula is not readily apparent. In 2003 the Legislative Assembly's Standing Committee on Planning and Environment considered Draft Variation 200, which introduced the sliding scale plot ratio formula for RZ1 dual occupancies. The Committee noted that the sliding scale was counter-intuitive (as the larger the block the greater the restriction), and that it lacked logic.

The Committee found that the Government should devise broader guidelines for the suitable siting of dual occupancies that take into account topography, orientation, and the shape and size of the

block. The Committee strongly recommended that the 800m² block limit for dual occupancies be maintained, and that the proposed sliding scale plot ratios be abandoned.

As discussed below, the only apparent policy objective for the formula (and related rules) is to discourage dual occupancy developments – particularly in established suburbs with larger blocks. If this is the case, the policy objective is inconsistent with the objectives outlined in the Paper.

4. The formula unfairly disadvantages dual occupancies

Unfair disadvantage – large dual occupancy dwelling blocks

The formula disadvantages dual occupancy dwelling owners of larger blocks. For example, the relative increase in the value of a dual occupancy dwelling by reason of a larger block would be less than for single dwelling blocks – as the larger the block for a dual occupancy the less relative potential there is for future development.

As discussed above, there is no apparent policy justification for this consequence. Again, as an illustration, the character and aesthetic of a neighbourhood is not determined by the nature of the legal title held by the proprietors of a dwelling or block. In this sense, the formula ‘unfairly’ disadvantages owners of dual occupancy dwellings on larger blocks.

Unfair disadvantage – dual occupancies generally

Subdivision

Where a standard block is subdivided, the plot ratio is 50%.

If, however, the subdivision is of a dual occupancy housing development, then the plot ratio that applies to the subdivided property is determined in accordance with the formula.

In other words, two different plot ratios may apply to four identical blocks merely by reason of the fact that two of those properties previously constituted a dual occupancy housing development, for however short a period of time.

There does not appear to be any policy justification for this differential treatment, other than to make dual occupancy development less attractive. In this sense the application of the rules appears to unfairly disadvantage owners of dual occupancy dwellings.

Competition

Under the current rules, a situation can arise where there is ‘competition’ between the owners of separately titled dual occupancy dwellings on the same block. This is because the plot ratio is calculated on a combined basis. That is, one dwelling may have a plot ratio of 25%, while the other has a plot ratio of 35%, which evens out to 30%. In these circumstances the neighbour with the lower plot ratio is unable to extend, even though they fall well below the 30% ratio.

In our view this is inequitable, and could lead to disputes between neighbours where there is additional plot ratio available. Effectively, the first neighbour to receive development approval can ‘claim’ the available ratio.

Proposed solution – remove the formula and increase the RZ1 dual occupancy plot ratio

In our submission, there is a strong case for increasing the maximum plot ratio applying to RZ1 dual occupancies. This change would increase the viability of dual occupancy developments and support a greater mix of housing within established suburbs. Crucially, it would also let home owners such as

ourselves to remain within established suburbs, as it would allow us to make modest extensions to our homes in order to accommodate our growing families.

The primary argument against increasing the maximum plot ratio for dual occupancies is that it may impact upon the character and aesthetics of a neighbourhood – attributes which are valued highly by many Canberrans. We agree that this is important. However, given that all other forms of housing in RZ1 neighbourhoods – including surrendered dual occupancy blocks and single occupancy dwellings – have a plot ratio of 50% or more, the argument for maintaining the dual occupancy plot ratio at such a significantly lower level does not hold – particularly where a dual occupancy dwelling is on a large block.

Indeed, the Explanatory Statement for Draft Variation 343 – which introduced a flat 50% plot ratio for dual occupancy dwellings on surrendered blocks – argues that this ‘represents a modest increase in the development density potential of the surrendered blocks’, and that ‘the existing amenity of surrounding suburbs and streets will be maintained through code requirements also contained in this variation’. There is no reason why these arguments do not also apply to RZ1 dual occupancies more broadly.

For the reasons outlined above, we further submit that the formula should be replaced with fixed plot ratios to achieve the objectives identified in the Paper, and to remove perverse and inequitable outcomes.

In the interests of fairness, we propose that the plot ratio requirement should apply equally to each separately titled dual occupancy dwelling. That is, if the plot ratio were increased from 30% to 50%, each individual unit title within the block should be required to comply with the 50% limit, such that a home does not exceed 50% of its portion of the overall block. Further, determining the plot ratio on the basis of each individual dual occupancy dwelling avoids the potential for large dwellings being constructed on small blocks, by leveraging off the available plot ratio for the block as a whole.

Conclusion

Amending the plot ratio requirements would not only make dual occupancy developments more feasible, it would also allow families such as ours to make the modifications necessary to allow us to remain in our homes, without compromising the character of RZ1 neighbourhoods.

In our view, the existing requirements should be changed to increase the maximum plot ratio for RZ1 dual occupancies. A maximum plot ratio of 50% would be consistent with RZ1 single occupancy dwellings and surrendered dual occupancies. If the plot ratio is set at a level lower than 50%, we consider that the Plan should allow for a degree of discretion to take into account the individual circumstances of different properties, and any impact that the proposed development would have on the broader neighbourhood.

We would welcome the opportunity to appear and make our submissions in person should the occasion arise.

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

City Plan Submission

Thanks for the opportunity to comment.

I would like to focus on three points:

1. The UNSW precinct and its impact on residents on Amaroo St, Reid.

It is essential that the heritage listed railway remnants between Amaroo St and CIT Reid remains undeveloped.

The homes on Amaroo St are suburban homes and not considered by residents as part of the city. As residents, we would like the same degree of peace and quiet as other suburban homes. The existing green space acts as a barrier against noise and light pollution coming from the CIT and future UNSW. The lack of development is what enables this effective barrier. This area isn't a park that needs amenities, it's a peaceful nature corridor that separates Reid residents from the city.

The space is a heritage listed railway remnants. This heritage value needs to be preserved and not lost.

Gang Gangs occupy these areas and I understand a recent site survey has been conducted (Reid Residents Association involved) to identify nests etc.

Anticipated foot traffic from the city to the CIT/UNSW site should be via the established overhead bridge. Coranderrk St is a busy road and funneling foot traffic across the road and through the railway remnants is bad for pedestrians, the flora and fauna but also for the residents directly opposite.

There is no compelling case for this area to be 'developed'. UNSW has a huge tract of land given to it by the ACT gov for it to develop as it pleases. Reid residents in Amaroo St are seeking for the railways remnants to remain undeveloped so that it can continue to provide an effective buffer from a large-scale university development.

2. Rezoning (? Future investigation areas) Amaroo St and Booroondara St Reid

Rezoning risks damaging Reid's 'garden city' planning design. The inherent design value of Reid is that it has a pleasant microclimate through extensive large tree plantings and green space, limits on building size etc. On blistering hot days, which we will see more of in the future, Reid's design features mean that it is degrees cooler, leading to a better quality of life.

It is mind boggling that we want to squander these ideals and principles and promote multiple dwelling squeezed into a block, virtually no garden or green space, children using the driveway as their backyard etc. These are bad things.

Canberra has had an unprecedented population growth, with our government promoting migration under various visa schemes, and then at the same time has limited release of land. People complain about poorly designed and built cramped blocks in newer developments and instead of a focus on more land being released along with evidence based 'quality of life inclusions' like large apartments, green spaces and amenities, to promote happy living, instead the misplaced focus seems to be on 'greedy' people that live in the inner north on 'huge blocks' as the cause of the housing crisis.

Rezoning will guarantee one thing only. Builders will buy these blocks and build the maximum number of small dwellings on the available land. Any shrub/tree that isn't registered will go and extra cars will park on the street. The blocks will be hot and unbearable in summer. We don't want this.

3. Civic pool

Civic pool is a wonderful asset for the inner north community, and it has been sad to see it being deliberately neglected in the hopes that a massive property developer or other conglomerate acquires it for a stadium or apartments. The government needs to realize that families and residents in the suburbs nearby but also in the apartments within civic use this pool and are crying out for it to be restored. Children have swimming lessons here and many (including many older folk) use the pool /gym for exercise. This is a critical asset that the government should be renovating. Its current state is a slap in the face for residents who often feel neglected with respect to these types of services

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CRC PONY CLUB wants to remain at the existing site

Block 1 Section 70 Division of Lyneham, Deposit Plan Number 5401.

We ask the government to VALUE AND CONSERVE the opportunities our PONY CLUB grounds provide.

Canberra is an extremely innovative place combining Capital city with horse ownership and riding. A world class leader I expect in this regard. Riding in Canberra is an amazing reality. The trails through the city and around the hills are incredible. It is something that needs to be preserved and valued. It is culturally part of the rural roots of our country. (Great opportunity for tourism development). We hope the city planners continue creating a city that's innovative and supports its horse owning people to live a life very different from those in other cities.

By maintaining our grounds at the existing site, the club grounds would provide:

A different aspect on the arterial road into Canberra, supporting the **BUSH CAPITAL** identity.

A **buffer** to the highway for any residential accommodation provided at the racecourse. People would look out their windows onto our paddocks. Seeing our horses grazing or riders participating in lessons and competitions. The noise of the traffic from the highway would be reduced by the open space.

A balance to the heat sink the new building will become and maintain some **parkland** in the area between the housing and the highway. The grounds could be integrated into the residential area. The club could improve on the existing trees on the block to provide for even greater aesthetics. Walking trails bordering the paddocks would allow others to enjoy the horses from a distance.

Allowing the new apartment blocks on the racecourse to have more floors would mean the living space provided would equal the space available should our grounds have been destroyed. Greater height would make the views more interesting, taking in the golf course as well.

The club could become part of the **healthy waterways** initiative. Some of our lower paddock could be improved to support water habitat during floods. The lower paddock could enhance the water management of Sullivans Creek. A temporary fence blocking access to the area when wet would be possible. But then grazing the area could be managed and demonstrate regenerative agriculture practise to the city community.

Proof that city planning can preserve the culture and community that already exist and has been part of the local area since 1959. It will **increase trust** by the older suburbs that the government does appreciate small marginal sporting groups and recognises the need to care for them.

New possibilities might include:

A community garden area on the northwest corner of the grounds to allow neighbouring families to use the manure and come together to grow food. There are large power lines in this area which would not allow for development anyway.

A pony patting session each week to allow the public to get up close and meet a horse. It would not include riding as there is too many risks involved. But we could direct them to the riding schools in the region if they are interested. Then take them on after a couple of years at riding school

Removal

To replace what we have would be a major endeavour. Something that has been built over 60 years will take significant effort and finance to replace. And the process of doing so would be exhausting to our volunteers who are already flat out.

We can't just move our horses... they need fences, water, yards tie up points, weather protection where they live. Then riders need toilets and clubhouse. Equipment needs to be secure. Riding areas need to be safe flat and large. Arenas only answer some of the needs there is other riding experiences that require big flat open spaces. PARKING needs to be allowed for separate from the riding area.

PLEASE Protect the pony club environment as a COMPLIMENTARY part of the new territory plan.

Following: what CRC PONY CLUB has and what it provides

CRC PONY CLUB would like to remain at its existing site. We hope planners will shape Canberrans' future with appreciation for the existing PONY CLUB facilities which are so unique.

We ask the government to value and conserve the opportunities our grounds provide:

The experiences with horses, the outdoors, and the culture our club has developed.

(NOTE *OUR similar name* to the racecourse but a completely different club: we are a volunteer association affiliated with PCANSW and PCA Australia)

ABOUT OUR CLUB:

Canberra Riding Club (CRC) PONY CLUB came into being in 1959 when the Barton Hwy was a dirt road. Through years of volunteer service we now have:

CLUBHOUSE that was built entirely with volunteer labour and donated materials. It's a fantastic facility well used by whomever is using the grounds. Other clubs do not have this kind of facility. It is used for night-time meetings, theory sessions and canteen facilities as well as a first aid base and general meeting area.

AGISTMENT for around 10 horses. These positions are prioritised for riders under 18 years old. We need the fees which go back to the government for rates and rent. Without agistment we would not be able to pay our overheads.

ARENAS 2 fantastic arenas. One for beginners the other for a jumping arena Both fenced and well used. Private instructors also take lessons in our arenas

JUMP SHED, where our jumping equipment is kept. It also has a tank for collecting water

TACK SHED where all other event and riding equipment is kept

Toilets: we are on a septic system as the city service does not come to this block

PARKING AREA for floats suitable for up to 60 riders. We can also spill on to our riding paddock if needed. But still maintain *pony club rule of separating cars from riding areas*.

WATER infrastructure from meter throughout to paddocks.

DAY YARDS: separating visiting horses from agistees horses

AGISTMENT YARDS AND STABLES; with wash bay, shade and water facilities.

We make our grounds available to other riding clubs AT VERY LOW RATES AS OUR SISTER CLUBS ARE ALL STRUGGLING TO KEEP AFLOAT. And there are not many spaces with the **generous flat area** we have, where riding competition or training is possible.

Riding offers our members balance in their city lives. Many of our members experience anxiety during their adolescent years. Coming to the grounds provides healing and a distraction. Families know that horse ownership helps their children survive the social media modern lifestyle now enveloping them.

Owning a horse requires the parents to accompany their riders; it builds teamwork with other members and support for new families. Many members come with no previous knowledge of owning horses. The club supports and trains the horses, the riders and the families.

CRC is an amazing club. It has a strong family orientation and enjoys tremendous support in volunteer hours by its members. Sharing the care and love for our horses brings us together and our community is wonderful. This teamwork provides a great role model for our young riders. And the evidence of our older riders taking up the roles is fabulous. They are coming to our AGM to start taking on roles within the organisation. Training to be instructors.

Owning caring for and training a horse are part of this country's heritage, part of our culture and should not be left to just those with the means to buy a property outside the city limits. It needs to be accessible, affordable and enjoyable. Pony club provides support to this opportunity.

PLEASE Protect the pony club as a COMPLIMENTARY part of the new territory plan.

Submission of Draft Weston Creek Strategy

Page /	Issue	Comment
	5 big drivers	<p>These 5 big drivers, developed in 2017, are no longer relevant in post 2020 bushfire and post covid Canberra</p> <p>It recommended that a comprehensive review and engagement with community is undertaken to understand post-covid planning needs</p>
Pg 8	5 big drivers Blue-Green network	<p>The current proposed Blue-Green network outlined in the draft district strategies is inadequate for the following reasons:</p> <ol style="list-style-type: none"> 1) It does not incorporate Urban Heat Island effects or Vulnerability mapping and prioritise these areas for additional blue-green measures. <p>The CSIRO has undertaken mapping of urban heat for the ACT in 2017 https://publications.csiro.au/rpr/download?pid=csiro:EP178961&dsid=DS1</p> <p>Urban heat mapping and vulnerability to urban heat is fundamental to future planning of the ACT and any strategy that is not based on existing and predicted Urban Heat and includes definitive measures to address will not address Climate Change adaptation or intergenerational equity.</p> <ol style="list-style-type: none"> 2) The Blue Green Network ignores Bushfire Prone areas or the need to ensure adequate asset protect zones. <p>Any strategy that does not include Bushfire Prone areas or the need to ensure adequate asset protect zones for existing and future residents is inadequate.</p> <ol style="list-style-type: none"> 3) The Blue Green Network does not establish minimum canopy cover targets 4) The Blue Green Network should to acknowledge that most of the open concrete lined drains throughout older districts provide very limited ecosystem function. These concrete lined drains require extensive restoration in the short-term to improve habitat connectivity, amenity and urban cooling. <p>Given significant shortcomings of the proposed Blue-Green network, the draft Weston Creek Strategy will be ineffective in mitigating climate change.</p>
	5 big drivers Economic access and opportunity	<p>The draft strategy does not address the existing inequality for Weston Creek residents.</p> <p>Weston Creek only has 2% of total ACT Jobs and the strategy sets no targets or commitments to increase the % of ACT jobs in Weston Creek.</p> <p>There is a clear planning need to increase % of jobs in Weston Creek.</p> <p>Without an increase in the target for an equitable share of ACT Jobs for the Weston Creek, Weston Creek residents will be required to continue to commute to other centres for employment, adding to each resident's and the district's carbon footprint.</p> <p>As an example, the North Weston area where the RSPCA is currently located should be targeted as a jobs precinct rather than additional housing.</p>
	5 big drivers	The draft planning strategy for Weston creek ignores the importance of Hindmarsh drive as a central artery through Weston Creek.

	Strategic movement	<p>A review of the draft strategy at the district / suburb level finds that proposed infill areas in Holder, which will generate significant additional traffic movements, will focus that traffic through school zones along Mulley Street with additional conflicts between school zones and traffic and higher risk for children and their carers. There have already been incidents in these school zones.</p> <p>The strategy and proposed infill areas in Holder are not supported where they increase traffic that may conflict with the safety of school children and their carers, unless traffic calming and reduced speed limits are introduced concurrently.</p>
Pg 8	<p>5 big drivers</p> <p>Sustainable neighbourhoods</p> <p>Develop more diverse housing in and around the Weston group centre, integrated with rapid public transport corridors.</p>	<p>The draft strategy will not result in any sustainable neighbourhoods.</p> <p>As draft strategy does not address housing affordability, urban heat island, vulnerability to heat and access to an adequate share of jobs, the draft strategy will negatively impact sustainability for Weston Creek.</p> <p>The proposed rezoning of substantial additional areas to allow development of more diverse houses as the only outcome for Weston creek will not deliver any sustainable neighbourhoods as it will result in an increase in Urban Heat and will negatively impact intergenerational equity.</p>
Pg 8	<p>5 big drivers</p> <p>Inclusive centres</p> <p>Consider the role and function of existing group and local centres which may include in particular, Fisher local centre. Depending on the results of this consideration and whether further action is required, investigate planning and non-planning initiatives to support centre viability</p>	<p>The use of a word such as 'consider' is non-committal to Weston creek and is neither planning or strategy.</p> <p>To improve inclusiveness, please include a specific direction for each demographic group</p> <p>As an example, to be inclusive to children and families, Local centres in WC require better playgrounds, public toilets and picnic facilities. The model provided by Chifley local centre, which is a vibrant local centre as a result of a high quality playground where children and their carers can meet. This model is the benchmark for local centres around WC.</p> <p>There is also limited to no opportunities for safe areas for teenagers in WC and planning tends to ignore this demographic completely, as does this strategy.</p> <p>You indicate you are going to strengthen the cross-district network of community facilities but there is nothing in the strategy that commits to this.</p> <p>WC, Woden and Molonglo desperately need a purpose built large indoor sports facility that is large enough to provide for basketball.</p> <p>None of the existing sports halls at schools are adequate.</p>
Page 10	Weston Creek Strategy Plan	<p>This mapping is based on old data as the R7 down Hindmarsh drive is ignored</p> <p>There is no Rapid Stop that links Holder Shops and Cooleman Court and a Rapid link is not possible without impacting school zones and traffic safety on Mulley Street.</p> <p>The North Weston area is more suitable for Economic Opportunities than potential housing.</p> <p>The rationale for identifying Future investigation areas requires is inadequate</p>
Page 16	outcomes from stakeholder	Can you provide an appendix that provides all details of stakeholder engagement, number of participants and the % of those participants as a

	engagement activities by district	<p>proportion of district population so we can understand how much and the actual value of the engagement in shaping this district strategy.</p> <p>Dates for any consultation events, the duration and number of participants would also be useful</p>
Pg 19	Note: The data in this document refers to both 2016 and 2021 ABS Censuses as not all the 2021 Census data was available when the district strategies were prepared.	<p>A strategy based on 2016 data is inadequate as there has been a substantial building boom between 2016 and 2022</p> <p>The 2018 ACT Planning Strategy requires a review as a result of that property boom during Covid.</p>
Pg 19	Modelling based on these population projections suggests that 100,000 additional dwellings in the ACT will be required through to around 2063.	Can you add this modelling, the data and assumptions as an appendix
Page 23	<p>Macro trends and issues affecting planning</p> <p>Climate change</p>	<p>The Urban Heat Island (UHI) Effect must be stated here and must be a fundamental consideration.</p> <p>Any urban planning strategy that does not include UHI mapping and modelling will be ineffective in mitigating impact of Climate Change</p> <p>The Strategy must also address Heat Vulnerability mapping to identify areas where the population is most vulnerable to UHI and target those areas for heat-smart urban planning.</p> <p>Any planning strategy that is not based on managing UHI / UVI and cannot demonstrate that it actually improves UHI is of no value to existing or future Weston Creek residents.</p>
Page 24	Role as the national capital	Canberra is a Regional Hub, it is disappointing there is no regional planning considerations
	Post-COVID environment	<p>Social distancing and lock-downs are now an urban planning reality and are drivers for people exiting high density centres such as Sydney and Melbourne. This reality must be included in this planning strategy.</p> <p>The strategy must provide access to adequate urban open space and private open space.</p>
	Housing affordability	<p>Delete references throughout the document that suggest that rezoning to allow increased density will have any housing affordability benefit.</p> <p>Recent (Limb, M. 2021) planning studies in Brisbane have confirmed that affordability is not influenced by land use planning strategies that seek to increase density</p> <p>It is not in a developer's interest to flood the market with low value housing that would reduce their profit margin.</p>
Figure 9	Figure 9: Proportion of jobs by industry type by district, 2016 (note: 2021 Census data not yet available)	This figure is meaningless, how many residents in each district? What is the percentage of residents that live in a district but have to commute to a different district to work?
Page 32	Planning for population and jobs	As this section is based on out of date 2016 census data it is not reliable
32	Assuming the ACT's target for 70% of new dwellings to be within the existing urban boundary, this means a	The district strategies must include adequate modelling and impact assessment, Human Health Risk analysis on the Urban Heat Island (UHI) impacts of increased density to determine required mitigation measure?

	target of around 40,500 new dwellings in infill areas by 2046 with 17,300 in greenfield precincts and, by 2063, 70,000 infill and 30,000 greenfield dwellings respectively.	<p>There appears to be no analysis as to what additional density will mean for UHI or the ACT morbidity/mortality rates or energy consumption for cooling during those heat waves.</p> <p>Based on the precautionary principle, any % urban density strategy must be able to demonstrate effective mitigation measures to ensure to high density living will result in no net increase in urban heat and no net increase heat wave related deaths.</p> <p>There is already ample scientific evidence to indicate UHI impacts of high density living will increase urban heat and increase heat wave related deaths.</p> <p>crc lcl urban cooling guide 2017 web.pdf</p> <p>The CSIRO has undertaken mapping of urban heat for the ACT in 2017 https://publications.csiro.au/rpr/download?pid=csiro:EP178961&dsid=DS1</p> <p>The urban design principles currently proposed in appendix 1 are inadequate and have not provided any evidence that the effectiveness of those measures is well established or there is certainty the measures will mitigate Urban Heat impacts that will be generated by additional density.</p>
	As noted above, this modelling identified a need for around 57,800 new dwellings across the ACT in 2046, reaching 100,000 new dwellings in 2063.	<p>Please supply all modelling</p> <p>Throughout the strategy the document refers to modelling based on 2016 census data</p> <p>Modelling based on 2016 data is of limited value as a result of demographic impacts caused by covid, which negatively impacted migration and positively impacted housing prices.</p>
32	Focussing on urban growth opportunities within the existing urban area reduces the environmental consequences of continued urban expansion and reflects emerging changes in how we are living, including in smaller households, and what is affordable in relation to not only housing type but also location.	<p>Can you please substantiate this claim with Australian evidence.</p> <p>Do you have evidence from Molonglo or Gungahlin to substantiate, if yes please provide.</p> <p>Recent (Limb, M. 2021) planning studies in Brisbane have confirmed that affordability is not influenced by land use planning strategies that seek to increase density.</p> <p>Further, Urban heat island mapping in many high density areas of Australian cities, eg Western Sydney, demonstrate substantial negative environment consequences for high density areas. The data from urban heat island mapping also found that higher density areas use 100% more electricity per household compared to less densely populated areas where UHI was lower.</p>
Pg 33	Figure 10: Potential future housing demand, based on recent population projections, 2046 and 2063	<p>Can you supply a breakdown of age profile of this Population growth that is creating this demand</p> <p>Are these recent population projections, post covid?, If not they are unreliable</p>
Figure 13: Blue-green network Table 3		<p>This proposed Blue-Green Network mapping is inadequate</p> <p>The Urban Heat Island (UHI) Effect mapping must be a fundamental consideration.</p> <p>Further, any proposed land use change must include consideration of existing and predicted UHI.</p> <p>Any planning strategy that is not based on managing UHI and cannot demonstrate that it actually improves UHI will not address climate change or sustainability.</p>

		<p>The Blue-Green Network should include mapping of actual canopy cover for each suburb/district and a map indicating those areas that do not achieve the minimum 30% canopy cover as recommended to mitigate UHI</p> <p>The Blue Green network should identify surface water drainage features that are currently concrete lined as important features for future restoration to natural systems.</p>
Page 53	Active travel	<p>Can you confirm that active travel is an option for all demographic age groups?</p> <p>Can you provide a breakdown of existing and proposed participation rates for age groups.</p> <p>Can you elaborate how active travel is an option for the 0-4 or 65+ cohorts?</p> <p>What are the options for people with disabilities</p>
Table 5	Objectives for district planning – strategic movement to support city growth	<p>Uber Air taxis (elevate) and drone delivery will feature very prominently in coming decades, from 2026 in Melbourne and Brisbane by 2032, how will this transport mode be managed</p>
Page 57	Mixed – use developments	<p>The statements in this strategy entrench inequality for Weston Creek residents seeking access to employment as we currently only have 2% jobs but 4% of the employable population</p> <p>Land along Cotter Road, such as the RSPCA site and area east of the Defence College should be allocated for commercial to increase job opportunity and decrease commuting distances</p>
Page 57	More variety in housing types in the core of centres and adjacent areas can provide more choice for different households and help address issues with housing diversity and affordability.	<p>Include data from Australian situations and studies to support this statement.</p> <p>It is not in a developer's interest to flood the market with low value housing that would reduce their profit margin.</p> <p>This a narrative pursued by various governments and lobby groups that is not supported by any data.</p>
Page 57	Suitability for new housing	<p>Existing and predicted Urban Heat island must be a consideration and is separate to canopy cover</p> <p>Heat vulnerability must also be included as a consideration</p> <p>Bushfire prone areas and asset protection zones must also be included as a consideration</p>
Figure 19, pg 58	Figure 19: Potential suitability of areas for new housing	<p>The strategy must include a map that models change in Urban Heat island status if Housing were to occur as per figure 19.</p> <p>Provide an accurate assessment of predicted Heat effects of this densification will look like in 2063</p> <p>Based on the precautionary principle and recent legal precedent where future generations liveability must be considered, this map and densification strategies must be rejected unless it can be demonstrated that the planning strategy will result in no adverse impact on liveability</p> <p>This map omits Ginninderry and requires review to ensure those communities and land in that area is included</p>
Page 59	Future investigation areas	<p>These future investigation areas should not have been included in this strategy</p> <p>The methodology employed to identify future investigation areas is inadequate to justify any expansion of existing zoning in the territory plan:</p>

		<p>1) What is the existing territory zonings and what is the current supply and yield of those areas, what is the planning need for additional investigation areas.</p> <p>2) The transects presented in Appendix 1 are not based on reducing Urban Heat and will not mitigate the effect of Climate Change. Identification of investigation areas based on poorly scoped urban character types in Appendix 1 will exacerbate Urban Heat and will negatively impact liveability in these areas.</p>
Page 60	Rapid stop-to-centre connection areas	<p>Current investigation areas do not consider school zones and ensuring safety of school children.</p> <p>Some rapid stop to centre areas, such as Holder, would result in unacceptable impacts to child safety as a result of increased traffic on Blackwood Terrace and Mulley Street.</p> <p>Many planning pockets, if developed will see increased traffic on streets with school zones and result in unsafe corridors for kids. Active travel should also encourage kids and carers to safely walk to school. Child safety is not adequately considered as a constraint on future investigation areas.</p>
Page 60	Other future development areas	<p>Current access to employment in Weston Creek is inadequate.</p> <p>Please include the RSPCA site as a future commercial precinct</p>
Page 60	Planning at the district level highlights opportunities to create new connections while delivering complementary living infrastructure initiatives to address urban heat and contribute to canopy cover and permeable surface targets.	<p>Please quantify these targets. <i>Address</i> Urban Heat is ambiguous, even without any new development, large areas of Canberra will be unliveable in the next 50 years. This strategy must effectively reduce Urban Heat.</p>
Figure 20	Figure 20: Bushfire prone land in our districts	<p>Please include a map of bushfire prone land in the Weston Creek district strategy and required asset protection zones</p>
Table 6	Address urban heat – Counter the urban heat island effect and prescribe deep soil landscape and urban tree canopy requirements in public space and within developments.	<p>This is not good enough and the term <i>address</i> is ambiguous</p> <p>Urban heat and heat vulnerability must be baselined as part of this strategy.</p> <p>Change wording to <u>Ensure there are no increase in urban heat island impacts as a result of this strategy and that impacts of existing urban heat islands in the ACT are reduced</u></p> <p>Reducing UHI will reduce demand of energy to run reverse cycle air-conditioners.</p> <p>The strategy must also address heat vulnerability and actively target areas of high HVI for intervention. This district strategy must ensure it documents methods for improving UVI.</p> <p>Note, measures in Appendix 1 are inadequate for minimising UHI or HVI and Appendix 1 in its entirety is not supported at this stage</p>
Pg 83	The results of the 2021 Census show that around 23% of rental households in the ACT are in housing stress. The Australian Housing	<p>The Australian Housing and Urban Research Institute (AHURI) report is based on 2016 data and is out of date.</p> <p>If you are going to quote that report then also quote ANU Centre for Social Research and Methods, ABS, Regional housing supply and demand in Australia 2017 which found ACT had 6700 surplus dwellings.</p>

	and Urban Research Institute (AHURI) recently found ¹ that the ACT has a current shortfall of 3,100 social housing dwellings and a projected shortfall of 8,500 by 2036.	
Pg 83	The planning system also has a role to play in facilitating diverse housing forms, including through new models such as co-housing, manor houses and build-to-rent, which can contribute to more affordable housing options in the private market.	<p>Can you please substantiate this claim with Australian evidence or delete these statements throughout the strategy.</p> <p>Recent planning studies in Brisbane (Limb, M. 2021) have confirmed that affordability is not influenced by land use planning strategies that seek to increase density</p> <p>It is not in a developer's interest to flood the market with low value housing that would reduce their profit margin.</p> <p>This a narrative pursued by various governments and lobby groups to blame planning and land supply for housing affordability rather than cheap credit and Tax incentives that favour developers and investors.</p>
Pg 85	Figure 25: Weston Creek District	<p>The draft Weston Creek strategy is presented as a solution looking for a problem. The problem is</p> <p>The draft strategy has poorly defined or articulated planning needs for the ACT or Weston Creek or whether there is actually planning issues that warrant attention in a district strategy.</p> <p>It would be helpful if the draft strategy acknowledges the existing territory plan and existing zoning maps</p> <p>The strategy should then present an analysis of what is already planned and the supply the existing zoned areas will yield if completely developed as intended.</p> <p>Can you please include a map with bushfire prone land in Weston Creek</p> <p>Can you please include a baseline map of UHI and UVI and predicted change to UHI and UVI in 2045, 2063 based on current zoning</p>
Page 87	Natural features	<p>One of highly valued features of Weston Creek is the uninterrupted vistas to the east with Oakey Hill and Mt Taylor and views to the Brindabellas Mountains to the west</p> <p>Any development should ensure no impact to existing skyline and the sense</p> <p>Proposal to allow low rise developments throughout Weston Creek should not impact this value</p>
Pg 87	Weston Creek has one of the highest shares of tree canopy across the districts, sitting at 25% (as of 2018).	<p>The district strategy lacks a target for ensuring a minimum canopy cover that will mitigate Urban Heat Island.</p> <p>Best practice Climate change advice indicates a minimum of 30% Canopy cover will be required.</p> <p>A target of at least 30% canopy cover should be specified as a minimum target as part of this strategy</p> <p>crc_lcl_urban_cooling_guide_2017_web.pdf</p>
88	Employment hubs and economic activity / Transport and travel	This analysis is completely inadequate. What % of WC residents have to commute to other centres for work?

		<p>To reduce future commute, how many jobs in the various categories are presently provided in WC. Based on this, is there enough land in WC allocated for employment</p> <p>At the moment you are stating we only have 2% of total ACT Job market and then you completely ignore opportunities to increase employment. Not good enough</p>
Pg 88	New development areas that are currently proposed are limited to the northern part of Weston (north of Cotter Road) for residential development. This includes a private community facility site and potential future land release of the site associated with the relocation of the RSPCA.	<p>The draft strategy has not provided any compelling evidence that there is any planning need for additional residential land.</p> <p>What the strategy does indicate is there is a need for additional employment.</p> <p>It is recommended that the area surrounding the RSPCA includes additional commercial opportunities, to allow more jobs closer to Weston Creek and Molonglo. This area would be a great location for restaurants and limit the need to commute to others areas.</p>
Pg 89	Community facilities and local and group centres	What emergency services are available to WC?
Pg 89	Weston Creek has the largest share of population in the retiree age group (over 65) of any district, at 21% in 2021. With an older population the types of facilities and services may be different to other districts, and accessibility becomes a more important issue.	<p>1) did you ask the community if they want a cemetery?</p> <p>2) does age impact active travel options?</p> <p>3) why havent you provided any data on number of residents with a disability or specific housing need</p>
Pg 90	Weston Creek District – current snapshot	<p>This snapshot and the figures provided are inadequate</p> <p>What is predicted population in 2046 and 2063 What is predicted age profile in 2046 and 2063</p> <p>What is the existing zoning areas as percentage How many additional dwellings can existing zonings supply what is the level of uptake/ densification of existing zonings, eg RZ2 as a % how much of that zone is still developable</p> <p>How can you increase employment in Weston Creek from 2% of ACT total Jobs to 4-5%</p>
Pg 93	District strategy plan current and possible future blue-green network values and connections	canopy cover must be increased to a minimum of 30%, how will you achieve this?
93	The potential housing requirement for Weston Creek is for around an additional 1,300 dwellings by 2063. This will be infill development (as there	<p>All assumptions for this calculation must be provided as an attachment.</p> <p>Current Population is 24,460</p> <p>Predicted Population by 2046 is an additional 800 although there is no data to substantiate this need or whether existing zoning will accommodate this growth.</p>

	are no greenfield precincts in the district).	
93	The total baseline potential future employment across the district in 2063 is around 5,500 jobs.	Provide the % as a proportion of total ACT Jobs
Pg 94	Figure 31: Weston Creek District Strategy Plan	<p>Need a map for each suburb that shows current territory plan and overlays and what would change in this strategy, And What would change. Add column to future housing with existing housing and existing supply potential with existing zoning</p> <p>Why isnt the Bushfire hazard identified</p> <p>Why isnt there a new centre at Cotter Road to create more jobs and reduce commute.</p> <p>Why is there no Urban Heat Island mapping</p>
96	Weston Creek has the benefit of an extensive urban tree canopy and larger blocks that contribute to the blue-green network. Maintaining this amenity while allowing for infill development in appropriate	<p>The district strategy lacks a target for ensuring a minimum canopy cover that will mitigate Urban Heat Island.</p> <p>Best practice Climate change advice indicates a minimum of 30% Canopy cover will be required.</p> <p>A target of at least 30% canopy cover should be specified as a minimum target as part of this strategy</p> <p>crc lcl urban cooling guide 2017 web.pdf</p>
96	Table 10: Weston Creek initiatives – Blue-green network	<p>This current list of initiatives are inadequate to mitigate impact of climate change</p> <p>How will bushfire risk be managed and why is managing bushfire risk a medium term priority given how close fires came in 2020 and how much of Weston Creek suburbs burned in 2003.</p>
	Table 10	<p>Weston Creek needs a series of water features to assist with amenity and urban cooling.</p> <p>The current concrete lined drain that is Weston creek is an eyesore and requires extensive rehabilitation.</p> <p>The installation of series of ponds along the creek along with a water play playground is required to combat Urban Heat and improve water quality, amenity and ecosystem function for the district.</p> <p>Why is WSUD limited to new developments? Similar to street tree planting efforts, you will need to rethink and implement suburb wide WSUD initiatives</p>
100	Providing more capacity and opportunities for employment within the district, closer to home for local residents, may reduce pressures on major road networks that also service traffic from surrounding districts, and reduce the district's level of car dependence.	Please provide details on how you will increase WC % of total jobs and increase the number of town centres and job hubs to reduce these commuting pressures
106	Sustainable neighbourhoods	why is there is no consideration of needs for schools and other facilities based on Weston Creek demographics

106	An important part of delivering sustainable neighbourhoods will be addressing housing affordability. Planning and land release can contribute to addressing this by planning for a diversity of housing types and land supply to meet different needs and budgets.	<p>Can you please substantiate this claim with Australian evidence.</p> <p>Recent (Limb, M. 2021) planning studies in Brisbane have confirmed that affordability is not influenced by land use planning strategies that seek to increase density</p> <p>It is not in a developer's interest to flood the market with low value housing that would reduce their profit margin.</p> <p>This a narrative pursued by various governments and lobby groups that is not supported by any data.</p>
108	Figure 36: Weston Creek – Sustainable neighbourhoods	<p>This map is not supported and is very disappointing that it was released</p> <p>What level of consultation with every affected individual landholder has been undertaken if their block or neighbours will now allow 6 storey development</p> <p>Can you supply a map with total areas of existing zoning, and total dwelling yield / supply of existing zoned areas.</p> <p>What is the current uptake in existing areas where higher density is allowed.</p>
		<p>The strategy has not substantiated any planning need to allow the rezoning of 10 hectares of Holder for urban centre to allow 6 storey developments.</p> <p>This strategy map has no credibility</p>
	Figure 36: Weston Creek – Sustainable neighbourhoods	<p>Why isn't there a bushfire zone on this map</p> <p>Why isn't there Urban Heat Island Mapping. What is the change in urban heat island effect as a result of this map.</p>
		The mapping falsely identifies a rapid stop from Holder to Cooleman Ct, this has never been the case.
115	Supporting infrastructure required	What is the capacity of broadband in WC
115	Hindmarsh Drive and Cotter Road the main arterial roads, are under capacity at peak times.	<p>Can you supply the most recent traffic study that supports this statement, When was this written?</p> <p>Cotter Rd and Streeton Dve is a traffic jam every morning</p> <p>Hindmarsh drive banks back from the parkway to McInnes St,</p> <p>Heysen street is seen as an arterial road to Woden for Molonglo and WC because neither Cotter Road or Hindmarsh drive can cope with current traffic</p>
	Current traffic growth will need to shift to other more sustainable transport modes including active travel. Transport infrastructure projects will need to prioritise modal shifts and enhance connectivity, road user safety and amenity.	<p>What a terribly discriminating statement against any Weston Ck resident who cannot participate in active travel</p> <p>What do WC demographics indicate we need now.</p> <p>For any future population growth scenario what is the cumulative impact on arterial roads?</p> <p>how do elderly shift to other modes? How do very young shift to other modes.</p> <p>Will you allow Uber Air/Uber elevate?</p>
116	Electricity	Weston Creek is constrained by current reliance on existing poles and wires

		<p>It is requested that the ACT Govt fast track replacement of above ground poles and wires with underground cables as current Evoenergy requirements for managing vegetation around poles and wires restrict where large canopy trees can be established and reduce ability of Weston Creek to achieve minimum 30% canopy cover as recommended by</p> <p>http://www.lowcarbonlivingcrc.com.au</p> <p>crc_lcl_urban_cooling_guide_2017_web.pdf</p>
117	Table 15, planned infrastructure upgrade for WC	<p>None of these initiatives will mitigate climate change impact on Urban Heat Island for WC.</p> <p>Why is there no initiative to address bushfire risks</p>
119	Appendix 1 Urban Transect	What are the Urban heat characteristics of each transect character?
	T3 Suburban	<p>These design principles are inadequate to address climate change and urban heat islands</p> <p>refer http://www.lowcarbonlivingcrc.com.au/crc_lcl_urban_cooling_guide_2017_web.pdf</p> <p>For T3, tree canopy should be maintained and enhanced to ensure a minimum 30% cover for every suburb.</p> <p>Future road maintenance and upgrades to ensure permeable/porous paving</p> <p>Only reflective cool materials permitted for renovations or new construction</p> <p>UHI mapping demonstrates an improvement in UHI for every suburb</p>
	T4 General Urban	<p>These design principles are inadequate to address climate change and urban heat islands</p> <p>refer http://www.lowcarbonlivingcrc.com.au</p> <p>CRC Publications / urban_cooling_guide_2017 CRC Publications / Guide to Low Carbon Precincts</p> <p>For T4, tree canopy and shading structures should be maintained and enhanced to ensure a minimum 30% shade cover.</p> <p>UHI modelling must demonstrate a short and long term improvement in UHI for each development</p> <p>Future road maintenance and upgrades to ensure permeable/porous paving</p> <p>Only reflective cool materials permitted for renovations or new construction</p> <p>Implement requirement for Green Plot Ratio of 40% to ensure canopy cover is enhanced for any new development</p>
	T5 Urban Centre	<p>These design principles are inadequate to address climate change and urban heat islands</p> <p>refer http://www.lowcarbonlivingcrc.com.au</p> <p>CRC Publications / urban_cooling_guide_2017 CRC Publications / Guide to Low Carbon Precincts</p>

		<p>For T5, tree canopy and shading structures should be maintained and enhanced to ensure a minimum 30% shade cover.</p> <p>UHI modelling must demonstrate a short and long term improvement in UHI for each development</p> <p>Design in low cost 'passive' sustainability elements e.g. Narrow building footprints, with high floor to ceiling heights allows for maximum daylight penetration, and with operable windows allows cross ventilation for heat purging and fresh air</p> <p>No overshadowing / impact on Solar access for existing dwellings</p> <p>Optimise solar access and PV rooftop potential e.g. arrange the street grid, building alignment and roof inclination to maximise solar orientation</p> <p>Future road maintenance and upgrades to ensure permeable/porous paving</p> <p>Only reflective cool materials permitted for renovations or new construction</p> <p>Implement requirement for Green Plot Ratio of 50% to ensure canopy cover is enhanced for any new development</p>
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Publicly accessible pedestrian path between Dominion and National – there is already a path that leads directly from DC to the Forrest primary School and its associated manned school crossing. Does this remain? What is the relevance/importance of this other path that warrants its inclusion as a principle?

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

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

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

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

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

There is no principle guiding density and associated parking and traffic implications. Construction on Section 9 will in effect lose some 200 parking spaces that have been provided on the Italo Australian Club site. The pressure on traffic and parking in this area has been hidden during Covid with home based work but is now steadily returning to pre-2020 levels. Interestingly during the appeal on an earlier DA for Section 9, it was shown that National Circuit/Canberra Avenue traffic light intersection was over capacity. The proposed continuation of existing driveways on Dominion Circuit will put pressure on the Dominion Circuit/Canberra Ave intersection.

There is no principle relating to the immediate neighbourhood on Franklin Street which is NCA controlled and currently 2-4 story office blocks. Rather than potentially 6 or more stories, any development on this Section/s should be transitioning to the suburban environment not increasing height. It should be sympathetic with the ambience and nature of Forrest.

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

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

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

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

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

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

We purchased our home at [REDACTED], one of the above mentioned townhouses in 2000 with the view of which we have now achieved in November 2018 to downsize from a large Family home in Belconnen on a very large block that is now enjoyed by another Family with children. We have spent an extensive amount of money on our townhouse to make it more sustainable including double glazed windows throughout and solar lighting. We enjoy a much smaller footprint by rarely using our car now (we used it daily when living in our family home) catching public transport regularly. We enjoy the sporting facilities nearby including The Canberra Bowling Club and Manuka Oval, and are also Parishioners of the nearby St Christophers Cathedral. We enjoy walking in our area to enjoy restaurants and shopping. As we age in place we also find the nearby health facilities another factor for choosing our place of residence.

I have decided to make a “submission” rather than provide “feedback” because the “feedback” is form driven and only allows me to answer questions according to the themes which the EPSD would like me to follow.

Territory Plan

The proposed Territory Plan provides details of the new rules but does not provide information on the current rules. This makes comparison difficult.

The implications of the proposed changes are not spelt out. Without knowledge of differences in the rules it is difficult to understand what impact the new Plan would have.

I was unable to find the “ACT RZ2 Suburban Core Zone Study” and discover “why the existing built form does not demonstrate the intended variation of housing typologies between RZ1 and RZ2 zones”.

The Explanation of Intended Effects is really a textbook presentation, having no contextual relevance.

I think there needs to be an agreed Governance Model (the Urbanising Agent). I can't see it.

From a residential perspective the review appears to be part of a cat and mouse game, with developers being the cat and residents being the mouse. The Government seems to be happy facilitating the game.

Woden District Plan

I live in Curtin.

The map on page 120 shows that most of east Curtin is an area of investigation. The intention according to the document “is to allow townhouses with a 3- storey limit that can integrate with and overlook the blue-green network. The Curtin Edge would be a high amenity urban edge with safe connections to light rail and local area facilities”. This outcome would lead to the destruction of a beautiful walking area and would box in the residents on the eastern edge of Curtin. There would be no blue-green network, as there currently is. These townhouses would also have to contend with road noise from Yarra Glen and look at Yarralumla Creek stormwater channel.

Here is an opportunity to outline exactly what sort of development standards would be applied and what the outcome would be. How would the proposed development dovetail within Curtin? But nothing. Because, based on what I have seen in the district plan, there is little consideration of the characteristics of the actual location.

“Consider opportunities to enhance the creek-line for local area amenity and ecology – part of a citywide blue-green network where possible”. Gobbledegook.

The elephant in the room is the light rail. In the Woden Plan it is just a pink line in Figure 39. Unfortunately there is no discussion of the integration of this important piece of infrastructure in the Plan.

Sadly, I believe the real objective is to add as many developer friendly townhouses to Curtin as is possible. The rest is window dressing.

Hi,

I am **providing feedback on the proposed planning provisions for Garages** in the Draft Technical Specification TS1 - Residential.

Current State

At present the **Single Dwelling House Development Code permits Garages to be built on the side boundary** for both large and medium blocks without a formal DA.

TS1 Proposed Change

The draft specification **TS1 - Residential proposes to change this arrangement**, requiring Garages to be **1.5m from the side boundary** for both large and medium blocks unless a formal DA is undertaken.

Concerns with the Proposal

I believe this would result in undesirable outcomes as:

- it would lead to garages (i.e. non-livable utility spaces) taking up more of the central, functional space of a block which could otherwise be used for living spaces (both built and landscaped)
- it would leave a 1.5m unused strip at the side of blocks which would have little value to the rest of the house and garden
- it would lead to garages comprising a greater proportion of the built frontage of blocks, reducing the habitable connection to the front of the block

Building envelope provisions continue to ensure access to light and air for neighbouring blocks, so there is no need to change the boundary rules to achieve those goals. Rather, the Plan should try to encourage constructive use of the entirety of our residential blocks with the goal of maximising their habitable indoor and outdoor spaces and amenity, including their connection to the streetscape.

Requested Action

I hope you will reconsider this change and continue to allow garages to be built on the boundary for medium and large blocks without a formal DA.

Thank you

IMPACTS OF PROPOSED NEW PLANNING FRAMEWORK ON YARRALUMLA AND DEAKIN

A 156 page document of closely spaced statistics, difficult to understand because of size on a computer, shows 70 percent urban infill, 22,000 new dwellings (I think!) and 48 percent apartments, 41 percent separate houses and 12 percent semi-detached with 26 percent of residents in the 60-80 age range (again, I think.).

These figures cover inner south Canberra.

To concentrate upon the two suburbs alone we find 1420 residents in Yarralumla and 1345 in Deakin.

However in a public meeting on 14 February 2023 a joint meeting of the Deakin and Yarralumla Residents Associations, information I was unable to find in the 156 planning framework document was revealed.

The audience was told that certain yellow spots along both sides of Adelaide Avenue in Deakin and Yarralumla were possibly development areas for three storey units, orange in the same area six storey and red eight storey. This I presume is not including DOMA's brickworks development (380 units) and most certainly not the Forest Place 350 units which is too far away from Adelaide Avenue.

The proposed development would swamp the Yarralumla shopping centre – already under parking stress.

Your own planning framework talks disarmingly of 'relative suitability' (whatever that means) on both sides of Adelaide Avenue in Deakin and Yarralumla and also the possibility of a Curtin/Deakin link, one presumes a road.

There also is a pedestrian bridge to facilitate light rail passengers (Page 97) to the two suburbs when clearly a lift is needed for 85 year olds like myself. Perhaps you might also clarify what the vague yellow markings (Page 111) mean on the Yarralumla map?

Is it proposed to buy and demolish houses along Adelaide Avenue, simultaneously destroying tree cover, which is such a feature of inner Canberra suburbs? Why do we need to jam more people into high rise, especially in older suburbs?

Why are we so besotted with being 'progressive' and wishing to join other Australian capitals in cramped living space?

These proposals have nothing to do with residents' quality of life and everything to do with government revenue, Green ideology and developer's benefits. Shame.

An innovative way to properly incorporate Fyshwick into Canberra and the inner south.

Being the largest industrial area, and housing a huge number of businesses, transport to Fyshwick is essential for workers. Unfortunately PT to Fyshwick is currently completely ineffective and non-existent for most of the area as the main arterial PT route is Canberra Ave.

It is a long way from the city centre and while bike paths are good they are very indirect. I'd like to suggest an idea to make Fyshwick significantly more accessible for non-car users.

The one rapid route goes along the southern edge of the area, meaning barely any of Fyshwick is within reach of the bus route as most of suburb is on the other side of the rail line. Significant retail and entertainment hubs exist like Capital Brewing, Bloc Haus, Pirie Street, Fyshwick markets, among many others. Despite this, all these areas are not accessible by PT due to the current design.

Please consider building a dedicated bus line that runs next to the rail line. This line would be in the centre of Fyshwick meaning that only one rapid route would be needed and the whole area would be centrally accessible by non-congested PT! Small laneways may need to be built to connect the bus route to the streets however this would be minimal space and businesses that would need to have small slithers of land removed would probably benefit from the new route. A bike path could also follow the same route making Fyshwick accessible to bikes as whole suburb is currently a death trap.

This new route would service all the places the current route services but also service a significant number of new sites that are currently growing massively as hubs for entertainment and retail. The Fyshwick markets would be closer to the new route too. In addition, this route could be converted to light rail once it reaches there.

Since the ACT government won't build any public infrastructure without also gentrifying/providing opportunities for property developers, I would also note that the land alongside the new bus/rail/cycle line could be rezoned and built up with apartments ;)

Curtin is a great suburb. Allowing more medium density housing would enable more families and future generations to enjoy living in the area. The arrival of the light rail line means it makes sense to allow more medium density housing nearby. This will give Curtin more vibrancy.