

Inner South District

The various proposed changes to zoning in the Inner South suburbs of Deakin and Yarralumla would change the character and livability of these areas forever. High-rises along Adelaide Avenue and extending far into the suburbs would create more traffic congestion and danger to community pedestrians and cyclists.

It is increasingly obvious that all of this densification is being done in order to artificially create demand for an unneeded light rail; line down Adelaide Avenue at the expense of an excellent existing express bus service. In the process the enjoyment of our suburbs by its residents is being sacrificed.

Submission response to ACT Government's draft Territory Plan and District Strategy - Inner South

I am a long term resident of Narrabundah for 40 years, having lived in 6 different homes within Griffith and Narrabundah.

I have serious concerns for the protection and preservation of the heritage value of the older homes in the Inner South generally in Narrabundah, Griffith and Red Hill and more directly within Narrabundah with heritage homes made of Canberra red brick and weatherboard cottages. Specifically I have concerns for the protection of the Narrabundah Workers Cottages in the zone bounded by Canberra Avenue, Hindmarsh Drive, Sturt / Jerrabomberra Streets and Goyder Streets. I currently live in one of these, a 1950s Cottage in Euroka Street, they are a living example of Canberras history and all my visitors are so impressed with the streets of older style cottages set in surrounding gardens, with established trees and our wonderful Street trees that blossom in Spring and colour in Autumn.

Preserving the green space ratio provides greater privacy and importantly keeps individual houses cooler in summer as well as keeping our streets and suburbs cooler.

There is a disturbing trend in my suburb of Narrabundah over recent years for knock down rebuilds with the rebuilds not in any way sympathetic to the surrounding dwellings. Replacements of Large concrete mansions filling most of the block with the small surrounding space often concreted or paved (for low maintenance I assume?) which only serves to create more reflective surface for UV rays and over heating of the surrounding atmosphere.

I Reference the following Points from the Inner South Community Council (ISCC) Recommendations drawing attention in particular to following Points;

Point 17

- An explicit requirement that DAs involving heritage matters are to be referred to the Heritage Unit and Heritage Council should be included as a mandatory Assessment Requirement in the Territory Plan (or as an amendment to the proposed Planning Act). Decision makers who decline to follow the Heritage Council's recommendation(s) should be required to give reasons for their decision.

Point 19

- The Current Heritage rules must be maintained, and all development must preserve the built heritage, streetscape and character of heritage precincts. Property-buyers should be asked to sign a declaration that they are aware of heritage rules and will respect them.

Point 9

- In particular, there must be mandatory requirements for measures which protect the amenity of existing and future residents, such as access to sunlight/natural light, privacy, amount of planting area on residential blocks, building height, **and protection of the character of heritage precincts. Residents have demanded a say on neighbouring knockdown rebuilds** (in response to the ISCCC's online survey in 2019/20). These issues matter to people because they facilitate a liveable environment.

Point 11

- The Living Infrastructure provisions which came into effect for established suburbs on 1 September 2022, and which are critical to climate change resilience, must not be watered down in the new Territory Plan. It seems, for example, from the Technical Specifications (page 5) that single dwelling residential blocks larger than 500 sq metres will only be required to have 24 percent plantable area on the whole block rather than 30 percent laid out in the Living Infrastructure provisions in the current Territory Plan. This seems to have been done by changing planting area to a percentage of private open space instead of the whole residential block.

Point 16

- An explicit requirement that DAs involving protected trees should be referred to the Conservator should be included as a mandatory Assessment Requirement in the Territory Plan (or as an amendment to the proposed Planning Act). Decision makers who decline to follow the Conservator's recommendation(s) should be required to give reasons for their decision.

Car-free / Pedestrian zones

Gungahlin town centre has a number of streets that should be made either car-free or blocked to through-traffic.

As Gungahlin has grown, it has become harder to navigate the town centre on foot, because crossing car-choked streets is now only possible at slow traffic lights. e.g. crossing Gribble St is very difficult as a pedestrian.

Traffic should be pushed out of the town core in favour of pedestrians and cyclists

Hibberson Street should be pedestrianised east of Gribble Street - this would make the main parts of Gungahlin feel much more contiguous.

Gungahlin Place should be pedestrianised between Anthony Rolfe and The Valley Ave - Busses would obviously need consideration here, but would ideally perform a U-shaped loop either from the north or south.

There is no reason for through-traffic on Gozzard St or Ernest Cavanagh St - these should be blocked with modal filters so vehicles are limited to take specific routes.

Raised 'Continuous sidewalks' as per the Netherlands should be used so that vehicles give way to pedestrians when turning onto sidestreets.

This sort of Pedestrianisation needs be extended to the wider city. e.g. the streets around the Canberra Centre in Civic

Narrow, Slow Residential Streets

Most residential streets in the Gungahlin area are too wide, straight, smooth and fast.

The 50km/h limit is too high, since it results in a 90% chance of pedestrian death. This limit should be reduced across the ACT.

The existing residential streets encourage a large proportion of drivers to exceed this limit, including some hoons.

All new residential streets should be similar to CandleBark Close, Nicholls - narrow, windy and off camber / bumpy - hence forcing slow speeds.

Raised 'Continuous sidewalks' as per the Netherlands should be standard so that vehicles give way to pedestrians when turning onto sidestreets.

Wildlife Corridors

New developments (e.g. Kenny) need to have better wildlife corridors joining up bushland, wetland, and grassland areas.

The Inner South District Strategy for the Suburb of Yarralumla

The extensive high density, high rise, densification of Yarralumla proposed by the ACT Government in the Inner South District Strategy is not supported.

The low-rise, low-density character of Yarralumla that is highly valued by residents should be retained. Car park requirements in Yarralumla are already an issue and over capacity.

For Yarralumla the redevelopment of the Canberra Brickworks site, already underway, together with that of the CSIRO Forestry site, will add 730 dwellings to Yarralumla. These two developments alone will increase the number of dwellings in Yarralumla by 50%, and add commercial and retail space, hotel, and aged care facilities. Further densification beyond this is not warranted or supported.

The public green space and the private green spaces all contribute to **overall** green space. The dual occupancies and high-rise buildings reduce that private green space opportunity. The reduction of planting area from 30% to 24% on residential blocks is not compatible with the climate change issues we are facing. Solar access is also critical to liveable accommodation.

The Urban Forest Strategy and Bill set the target for the tree canopy covering 30% of the Territory's urban areas. The tree canopy cover in 2022 in Yarralumla was 30%. The proposed densification and urban infill can only result in a major reduction in the urban canopy cover in Yarralumla. In addition, the new RZ1 and RZ2 zoning which provides for secondary residences, basements, and for buildings to block cover 70% of the block, will result in loss of private green space for trees, including the garden areas over basements as these have insufficient soil depth for tree growth. There are no plantable areas in these older suburbs where additional large tree plantings can occur to replace the densification and urban infill proposed. The Inner South District Strategy will create urban heat islands in Yarralumla that do not exist at present, and hence not mitigate climate change impacts as required in the draft Territory Plan. This is in direct conflict with the Planning Bill (s10(2) and Territory Plan and reduces the tree canopy cover in both these suburbs to below the Urban Forest 30% target that is currently being met. Densification will also increase noise levels/pollution.

District Strategies

The proposed scale of redevelopment for Yarralumla in the Inner South District Strategy, with high rise, high density, does not align with the zoning of Yarralumla set out in the draft Territory Plan, nor does it take into consideration the greater preference and demand for town houses rather than high rise accommodation.

In order to give effect to the Inner South District Strategy the zoning of Yarralumla in the draft Territory Plan will need to be changed to RZ4 Medium Density Residential Zone and RZ5 High Density Residential Zone. The requirement for such zoning changes is not made clear.

This raises the question as to whether the ACT Government is intending to use Compulsory Purchase of Residential and Commercial Blocks to affect such large-scale redevelopment. The redevelopment takes a plain sheet of paper, Greenfields approach to an existing populated urban residential and commercial environment.

Territory Plan

The proposed Adelaide Avenue redevelopment, to high rise, high density, includes the Yarralumla Diplomatic Precinct which is National Land (Commonwealth) and also the responsibility of the National Capital Authority. This Diplomatic Precinct currently comprises the Embassies of Saudi

Arabia, Nigeria, Sri Lanka in Yarralumla, and that of Italy in Deakin. Also in this area for redevelopment is an endangered grassland habitat.

The Canberra Grammar School in Grey Street Deakin, currently zoned "Community Facility," is also included. Is 'The Lodge' also included?

The rationale underpinning densification and 70% of new housing being in existing urban areas should be reassessed given the fundamental changes in the work, transport and energy paradigm, and the existing planning framework should remain in place.

Consultation

The hallmark of this process is that it is developer driven and to increase income for the ACT government, it is not community driven. Also, there is little or no evidence of engagement with the community and the National Capital Authority in relation to Adelaide Avenue and the diplomatic zone.

There has been insufficient advice to, and engagement with the community, for a package of measures of such complexity that proposes such extraordinary changes to the nature of suburbs through densification and large-scale redevelopment. Community feedback from the 2021 district planning consultation has been ignored and issues identified remain.

Aspects of the advice by the ACT Government has been presented in a way that can readily be misunderstood. The residents of Yarralumla would be under the misapprehension that the zoning will not be changed to provide for major densification for 30-50% of the area to be redeveloped to 3-6+ storey apartments. This is misleading.

The proposals appear to be a greenfield approach to planning/redevelopment in an already populated urban area which raises the issue of how will this land be obtained? There is also no rational or criteria for the areas identified as urban core, urban centre, and general urban.

Current Heritage rules must be maintained with built heritage streetscapes and precinct character preserved.

I am a Curtin resident and am writing in support of the proposed Edge Street along the Yarralumla Creek corridor together with the supporting links to Cotter Road and new bridge over Yarralumla Creek.

The development of the Molonglo Valley suburbs Coombs, Wright, Denman Prospect and now Whitlam have turned Curtin's McCulloch St and Curruther St between Curtin Shops and the Yarra Glen overpass into congested peak hour major access roads.

These roads were never designed for this purpose and the significant increase in traffic points to a major planning failure in the infrastructure supporting the Molonglo Valley development.

During peak hours heading south from Cotter Rd along Curruthers traffic is often banked up to Yarralumla Creek as commuters access the Deakin office and medical precinct and bypass Woden to access Canberra Hospital and the east side of Woden. The reverse happens in the afternoon where traffic can be banked up between the Curruthers overpass and the Curtin shops.

There is no clean access from Yarra Glenn through to the Cotter Rd and no clean access to Yarra Glen from Cotter Rd. It is a significant planning failure exacerbated by inadequate traffic calming along Curruthers particularly in the top section.

The proposed Edge St with clear bridge access to Deakin office and hospital precinct and to Woden is past due. It need to be a priority project before any other infill is undertaken.

The major advantage of infill development is to lower infrastructure cost, to maximise public transport access and it increase the vibrancy of urban hubs leading to increases in services. This works best in major cities that have significant public transport networks. That's not Canberra. The only way public transport network development can be made to work effectively in Canberra is to adopt the strategies in your proposal, infill along corridors and provide public transport.

The key point is that the public transport and commuter access infrastructure must be provided first and for the Woden-Curtin proposals that means prioritizing the Edge St and associated bridge and access infrastructure. It is essential that this be integrated with first class cycling and pedestrian access and public transport.

We now know that the Earth cannot survive an increasing population and its associated consumption. The ACT Govt has led the world in converting Canberra to renewable energy. Now is their opportunity to lead the world on population management. Instead of planning for a Canberra population of 780,000, set the maximum population to 500,000. Walter Burley Griffin's vision will mean that this city will continue to be an attractive, liveable city with plentiful wildlife and vegetation, as well as all the attractions of a major city. Electrification will ensure we retain our unpolluted air quality without contributing to global warming. By 2063 Canberra will be the envy of the rest of the world.



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Highly commend the idea of the yarralumla creek corridor being returned to
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city's

citywide

cityscape



Aa



2 March 2023 at 5:10 pm

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Highly commend the idea of the Yarralumla creek corridor being returned to a more natural state encouraging wildlife, return of Nat native species habitats cool and sustainable city

Keep sunlight in the Curtin Shops by solar planning ensuring buildings do not overshadow the square



"city"

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FEEDBACK RE THE PROPOSED NEW TERRITORY PLAN AND DRAFT WODEN DISTRICT STRATEGY

Having read the documentation, I am concerned about a number of issues. These include:

- increased urban heat caused by removal of mature existing trees and gardens to make way for new dwellings on smaller blocks with no-where to plant trees for the future to help alleviate the heat – moderation, common sense and careful planning is needed in determining the number of new dwellings and the loss of trees and community amenity
- overshadowing from tall buildings, causing neighbours homes to be colder in winter (as is the case with our next door 2 storey dual occ)
- dual occupancies must not exceed the plot ratio (as is the case with one of the dual occs next door to me. It is a planning anomaly as once sub-divided it will have a plot ratio of 57%)
- Occupants of nearby dual occupancies park in the street or on the footpath as their allocated two parking spaces are too small to allow easy access (ie the location and size mean it is too difficult for the drivers to manoeuvre their vehicles in and out – the Rules re car spaces were met for the DA, but in reality they have proven to be not practical or workable)
- I am all for a 'blue-green network' but am totally opposed to the proposal for the Yarralumla Creek corridor – it is one of my favourite walking areas in Curtin and I cannot believe that it has been suggested that it be turned into a road. In summer it is a joy to walk along as it has densely shaded deciduous trees, and in winter it is sunny. I do not believe that it is necessary to have a road there and as a resident want to see it left as is.
- We need better pedestrian and cycle access to the shops and other parts of Curtin, not more roads (this was brought up in the Curtin Master Plan, but still nothing has eventuated)
- The Yarra Glen, Yamba Drive and Melrose Drive roundabout – again I am stunned that this area would be considered for development given issues around flooding, urban heat banks, vehicle access, driver and pedestrian safety, amenity for nearby residents.
- I often enjoy the walk to Woden along the bike path with the green space and mature deciduous trees. I am opposed to a new street being put in in this area around Holman St.
- The Radburn estate is a part of Curtin's history and is a unique area. It should remain as is and not be dual occed or have apartments built. The estate is another great place that I walk around and this contributes to my good health, mental well-being and enjoyment, not to mention benefits to the environment and contribution to alleviating heat banks.

Back in 2017/2018? I submitted my views to the ACT Government regarding heights at the Curtin shops, including my very real concerns about overshadowing in winter months. I am opposed to any planning changes that would allow an increase in building heights. I do not want the 5m 'solar fence' around the Square to be removed. Don't overshadow our sunny winter square that is a well-used part of Curtin and a lovely place to shop, eat, sit and enjoy.

As an ACT resident I hope to see fair and transparent planning. I also want to have faith in my local government and planners and know that we are not going to be assured of one thing and then discover that that is not the case. This has been my direct experience in the last ten years and has resulted in poor outcomes. Eg the multi-storey development at the Curtin shops. I know first-hand - that some aspects of the apartments were not built according to the rules. My granddaughter lived in a 1 bedroom apartment that was so small there was not enough room for a small table to eat meals at. Some rooms measured less than the required minimum set out in the Rules in the DA. Are west facing tunnel shoe-boxes the best we can do and the best we can offer those who are at the lower end of the rental scale? I don't think so.

I chose to live in Curtin because of its open spaces, connecting walkways, mature deciduous trees and their subsequent cooling effect. I am hoping that with sensible planning and common-sense

more people can live in this beautiful suburb, including in a mix of well-planned apartments, townhouses or small developments, without losing what it is that draws residents to our suburb in the first place.

Canberra's current planning is letting down its residents. I am concerned about our future and the direction we are heading in. I hope that sensible and appropriate development will prevail, with genuine care for our environment and transparent and sincere community consultations and reporting to ensure that Canberra is a liveable city.

Territory plan:

I am concerned about the changes to the territory plan.

Allowing blocks to be subdivided before houses are built, while increasing flexibility (I can sell part of my backyard to my neighbour to extend his garden), risks people subdividing for a quick profit when they leave their residence, and saddling the existing community with the increased density.

I do not understand the plot ratio requirements, but no one should be able to cover more than 50% of their property with buildings and impermeable surfaces. We need more greenspace on each property, not less, in order to provide play space for children, space to grow fruit and veges, wildlife amenity, and reduced the urban heat effect. Too many developers have plonked large houses/units on small properties, so the building reaches to the fence line on 3 sides, or have concreted almost all the block.

Reducing the maximum height of a lower floor level from 1.8m to 1.0 metres is ridiculous. No adult can stand upright if the ceiling is only 1.0m.

“Amended vehicle parking requirements” is not “reduced vehicle parking requirements”. You cannot encourage active travel while developers are digging massive underground car parks for each new house or unit. The Curtin shops is a case in point: apartments built over the shops, so they are in easy walking distance of shops, churches, schools and bus stops, yet the development included underground carparking, the excavation of which reduced the amenity of the shops for many months longer than necessary, and which only add to the use of cars in an area where residents don’t need cars. It also drives up the price of the apartments unnecessarily, so that tenants who do not have or want a car still pay for the carpark they neither want nor need.

Prohibiting gas connections is just wrong. If people want to use gas instead of electricity, they should be allowed to. People need to have choice. Forcing people to use one particular energy source just drives up prices, as we are witnessing in the electricity market now. It’s just another government-imposed ideological cost burden on the poor. Hydrogen is far riskier than gas (remember the Hindenburg?)

WODEN DISTRICT POLICY

I hope “Enhance priority connectivity corridors for threatened species including links between existing nature reserves including Mount Mugga, Oakey Hill, Mount Taylor and Farrer Ridge” means getting rid of the ugly park hurricane fence that blights visual amenity, discourages use of the park (who wants to play in a prison yard?), and prevents human and animal connectivity.

All the proposals seems to assume taller buildings, and more buildings, therefore the loss of existing open space and green spaces. We do not want to become like Sydney and Melbourne: large population, densely packed in, in tall, ugly, unsocial apartments. While the proposals for more tree

is greatly to be welcomed, these should not be simply as band-aids for an otherwise overpopulated, over built city.

We need a proper population policy, which is conspicuously lacking from the territory plan. Current planning seems to assume, and indeed, require, constantly increasing population. This is the whole problem humanity faces: we need to level off and cap population, so we can improve our lives, rather than try to simply accommodate ourselves in an ever-densifying city. We need to set an irrevocable outer limit to the city, ideally within the current edge, certainly not beyond it, and a limit on the number of people living in the ACT, and on the sizes, heights and density of buildings. Far too many streets are being pockmarked by inappropriate developments where developers out to make money knock down a perfectly good house, and remove its garden to erect in its place 2 or more ugly, squashed apartments or townhouses, with far too much concrete as surrounds. Then those seeking a house are forced into these gardenless abominations because there is no alternative, or at least no affordable alternative.

This is bad for human mental health, social health and for the environment, and simply increases heat stress for all.

We do not need more apartments, which only encourage social isolation, and a lack of engagement with nature. Every home should have a garden and trees, and space to play and grow food.

Rather than ever increasing the maximum permitted heights, we need to stop sprawling out and up, and reconsider the overall amenity. Too many excessively tall buildings have sprung up in recent years and the horrendous changes to Northborne Avenue that the government has not only let but encouraged, are a visual and social blight. We don't want that sort of thing southside.

Changes proposed for Curtin with new roads replacing parkland, and the ruin of the Radburn plan there are abominable. ALL suburbs should be Radburn plan, with houses actively fronting onto parkland and walking/cyclepaths, with cars discouraged by consigning them to back lanes. Curtin as it is (or at least was before the highrise apartments over the shops were permitted against community wishes), was a lovely suburb with large sections, mature trees, and very walkable. The increased density permitted by developers who pave entire blocks and erect ugly 2-storey townhouses with no gardens, are ruining it, and turning it into the ugliness that is Gunghalin.

We want more trees, more gardens (for all), houses facing paths and parks, not roads.

We do not want 'edge streets', or replacement of open fields and green space with housing, let alone high-rise.

There is no NEED for more and more people. Canberra is already too large.

No development should be permitted along Athlon Drive's current green spaces., and no more than existing heights anywhere in the Woden area.

We need all concrete and gravel median strips to be planted in grass, shrubs and trees, to shade the roads (e.g. along Hindmarsh Drive through Phillip).

We need removal of ugly prison fencing on the bridges at Curtin and Yarralumla over Yarra Glen.

We need less concrete and more grass and trees everywhere.

We want Curtin horse paddocks to remain as open green space, and horse agistment is ideal, giving children experience of animals.

We do NOT want development or edge streets or other interference with the parklands surrounding Curtin. We certainly do NOT want high-rise (anything above 1 or 2 storeys) along it.

We want Radburn planning retained and expanded Canberra-wide.

We do NOT want Canberra golf course replaced with housing or any other development. If not a golf course it should become public park.

We need better encouragement of shop variety at Phillip. The closure of Magnetmart, the only hardware shop, and its upcoming replacement with yet another petrol station, and a second McDonalds, is ridiculous.

Light rail should REPLACE car lanes on the roads, not be built so as to remove green space adjacent to the road (as happened along Northborne Ave). If light rail is meant to reduce car reliance, then it needs to replace car facilities, not be additional to them.

To encourage active travel then people need to be able to live near where they work, and not have to travel 50km to the other end of the city to find work. Government workplaces need to be spread out across the city, not concentrated in Parkes (where there is no housing).

If light rail means the changing of Yarra Glen to look like Northborne Ave does now: an endless Berlin Wall of ugly highrise, then we do NOT want it.

Canberra should be low rise, and spacious, and bush-covered. A garden city. I fear the revisions to the plan offer little more than ecological window dressing on a plan whose real intent is to keep squeezing more and more people in, and reducing the amenity and pleasure of all. We do NOT want to end up looking like Sydney.

Less concrete, lower buildings, more trees and more green space around every home.

Please.

I strongly object to part 1.4 of E7 - Non-Urban Zones Policy. The exclusion of the ability to include motorsport facilities as part of outdoor recreation facilities in Non Urban Zone 2 severely hinders the development of motorsport facilities in the ACT. Motorsport is highly dependent on having as low a residential noise exposure as possible. The areas zoned NUZ2 are the the most isolated non-conservation areas in the ACT and as a result represent the best opportunity for developing motorsports facilities, subject to other constraints of course. It is also highly irregular to specifically prohibit motorsport facilities in rural areas and not consistent with what is done in other states, as these areas are the most suitable for such developments. Removing this particular control would enable the development of much needed facilities in the Canberra-Queanbeyan region. Henceforth, this prohibition should be eliminated.

I object to proposals to weaken the standard that apartment blocks must have at least one parking space per residence. Even if not used for commuting, many households will have (indeed, probably require) a car for travel elsewhere, especially interstate. Furthermore, the reduction of parking will reduce space available for visitors (again, many of who may come from interstate). The reduction of parking capacity will encourage parking on-street as is rampant around many similar developments in Melbourne. There will be no reduction in the price of a unit with the cost and space savings being relatively minimal (especially with much apartment parking being underground and not available for residences). The costs saved in building will be minimal and will simply accrue as extra profit to the developer.

Eliminating parking capacity also discriminates against people who wish to use a motorcycle. Motorcycles are vulnerable to being stolen and so require secure storage overnight. If a person does not have access to a car parking space they may be unable to store a motorcycle safely and thus be precluded from buying one.

Territory Plan

Outcomes-Based Plan

While moving to an outcomes focus is a worthy concept, it carries the risk of reducing the certainty for both residents and developers that comes with a rules-based approach whilst not achieving outcomes that meet general approval. The outcomes, as described in the draft Territory Plan, sound commendable but are very vague and can mean many different things to different people. The interpretation of acceptable outcomes is left too much in the hands and minds of planners increasing the likelihood of conflict between proponents and opponents of specific development proposals. The outcomes need to be defined more precisely than they are in the draft Territory plan, with those definitions being based on evidence.

As part of a shift towards an outcomes-based Plan, even if more tightly defined outcomes eventuate, there also needs to be a shift towards strengthened oversight of planners to avoid the impression that planners are excessively favouring either developers, residents, or other interest groups in their interpretation of these outcomes. It is not clear from the draft Territory Plan that there are simplified and publicly accessible mechanisms for appeals against planners' interpretations of "outcomes".

The Territory Plan should:

- either incorporate tighter, evidence based outcomes or incorporate a mechanism for developing such outcomes using input from residents via their Community Associations
- provide a simpler, accessible mechanism for appeals where those affected by planning decisions believe that "outcomes" have been badly interpreted.

Increasing Density in RZ1 zones

The draft Territory Plan allows Build-to-Rent developments in all residential zones. These developments, multi-unit housing designed for leasing to tenants, are essentially allowing multi-unit housing to spread across RZ1 zones. RZ1 zones are specifically designed for single dwelling occupancy and should not be sacrificed in pursuit of the ACT government's zeal for higher densities across the city. RZ2-RZ5 zonings are the appropriate places for such multi-unit developments. People have bought into RZ1 zones specifically because they are low density, single dwelling areas and will be very perturbed if they find that multi-unit developments are now to be permitted beside their houses. One of the purposes of the new Territory Plan is to promote diversity across the city – this means that low density areas should be retained to provide this choice for those who desire it. Allowing multi-unit developments across all residential zones goes against this purpose.

The Territory Plan should be modified to:

- Build-to-Rent developments should be included in RZ2-RZ5 zones but be prohibited in RZ1.

Inner South District Strategy

I am a resident of Forrest and so am providing comments on the Inner South District Strategy, with emphasis on Forrest and the implications of the Strategy for this suburb. Forrest is characterized by large blocks with single family dwellings (RZ1 zoning), extensive tree canopy cover throughout the suburb, and many areas of older dwellings including designated heritage areas. These characteristics contribute to the diversity of Canberra and provide important links to the city's social and physical history.

Heritage

The protection of Forrest's heritage built environment (heritage precincts, individual buildings, streetscapes, street furniture, etc) does not receive the explicit inclusion and priority in the Inner South District Strategy (ISDS) that it deserves. Maintenance of the built environment heritage is not clearly included in the 5 Big Drivers for the District Strategies (possibly included under cultural heritage under the Blue-Green Network driver and its far from clear whether this includes buildings) and this neglect then carries over into the structure of the ISDS, where the ISDS's includes protection of cultural heritage but does not specifically include the built heritage. For example, p41, p74 of the ISDS say that the Strategy does not take precedence over other instruments that deal with cultural heritage but the examples given all relate to natural, rather than built, heritage. Even the listing of heritage items on p87 noticeably focuses on natural heritage except for the last para which includes national institutions and the railway heritage in Kingston.

In fact, the richness of instruments on p41 and p74 dealing with the protection and maintenance of the natural environment emphasizes the paucity of specific policies and legislation dealing with the built environment. Consequently, it is of some importance that the ISDS helps plug this gap by explicitly including the need to protect the District's (and Forrest's) built heritage.

I suggest that the ISDS:

- specifically includes the built environment as part of the heritage provisions in the Territory Plan and the ISDS
- states that all current cultural and built environment heritage protections be retained and be given major weight when considering development proposals
- all DAs must be referred to the Heritage Council in recognized heritage areas
- and the reasoning behind any development decision that does not follow the Heritage Council's advice be made publicly available.

Change Area

The Change Area on Sect 19 Forrest lies between National and Dominion Circuits. Even though this Change Area will be subject to more detailed analysis before a decision is made on its possible development, there are some important points to be made at this stage. First, the part of Dominion Crt opposite this Change Area comprises residential 1 and 2 storey housing. There is currently a DA under consideration for 7 storey apartments on the site of the old Italian Club in the Change Area. This height of development is totally inappropriate opposite low rise individual housing. If the Change Area is subsequently proposed for development, the Dominion Crt side of Sec 19 should provide a transition with the T3 sub-urban zones (Urban Transect terminology, Appendix 1) on the

opposite side of Dominion Crt in accordance with the Urban Transect principles. At the moment the only recognition of the impact of this possible development is the need to “provide suitable landscaping to the Dominion Circuit frontage” (ISDS p118) – a totally inadequate transition between high rise developments and 1-2 storey residential.

The Key Principles for the development of this Change Area (p118) should include:

- Restriction of building heights to 3-4 storeys on the Dominion Circuit side of Sect 19 Forrest with reduced building bulk and adequate set-backs to provide a transition to low density dwellings opposite.

Hands off our suburb. Do not dismantle Reid, an inner city, garden suburb. Any developments should NOT encroach onto Reid. While one side of Booroondara is *not* heritage, it *is* *heritage* to the verge. And, it faces *into* the heritage side of Reid. The heritage and garden city nature of Reid would be compromised if heritage side of Booroondara were facing into apartments and medium-high density. Amaroo and Booroondara should not be rezoned and in fact should be protected as a vital part of the Reid community.

No rezoning or opportunities for densification and medium-high rise development should occur on the North side of CIT/UNSW.

Densify all you want on the southside (lakeside) of CIT/UNSW eg. Constitution Avenue. However CIT/UNSW should act as a buffer and a clear demarcator that the city ends there and does not encroach on to Amaroo, and then Booroondara.

Thoroughbred Park

Priority should be given to acquiring and developing Thoroughbred Park (without racecourse).

In terms of meeting a target for homes within a given space of time, this represents one of the best options for housing more people on the north side, with connections to light rail.

The cruelty associated with horse racing, as well as lives destroyed by gambling, mean that the social licence for horse racing may soon be nonexistent.

Air pollution

The ACT lacks an official air quality station in the inner north. However, thanks to citizen monitoring, it is now clear that Downer (and the inner north in general) has a wood smoke pollution problem on par with the Tuggeranong valley.

Redevelopments should be conditional on no new wood heaters. Substantial rewards should be offered to remove existing wood heaters. Existing subsidies for wood heater removal have not been effective enough. That it is still legal to install wood heaters sends mixed signals. They have become something of a status symbol in new homes.

The medical advice on wood smoke pollution is unequivocal. There is no safe level of exposure. Around 1 in 5 people diagnosed with lung cancer have never smoked. Wood smoke pollution increases risks of asthma and heart attacks. It affects mental faculties and education outcomes in children. Older people are particularly at risk, which is a concern due to the coming Goodwin retirement village, and the move towards ageing-in-place.

Wood heaters do not belong in a modern sustainable city. We urge the ACT government to look at how European cities are grappling with this problem, and act sooner rather than later. For example, a ban on wood burning is being considered in the UK:

<https://www.theguardian.com/environment/2023/feb/28/ministers-urban-ban-domestic-wood-burning-pollution-britain>

So-called "eco" wood stoves still emit as much pollution as a heavy truck, even when operated "properly" (which they often aren't):

<https://www.theguardian.com/environment/2021/oct/09/eco-wood-stoves-emit-pollution-hgv-ecodesign>

There have been ongoing incidents of illegal wood harvesting in ACT nature parks. Even legal wood harvesting is damaging to native forests.

We could not find one reference to wood heaters in the territory plan documents.

Sustainability and Net Zero Carbon

The ACT's consumption of steel, concrete and bricks should be included in the territory's greenhouse gas inventory. Otherwise, the ACT government's claims around net zero emissions are highly dubious. The embodied carbon in buildings is a large fraction of the lifecycle emissions associated with the building and its operation.

As a result of this, developments in suburbs should be weighted towards renovating and retaining existing structures rather than knockdown/rebuild.

Audit of all regulated trees

We are aware of the new Urban Forest Bill to apply from 1 July 2023. In conjunction with potential future rezonings, it is not easy to predict the effect on the character of the suburb.

In our neighbourhood, we have witnessed regulated trees subject to major pruning or even removal, apparently without

any approval.

In our view, the tree protection legislation has relied too much on honesty. There should be an ongoing audit of regulated trees on leased land in the territory. Without proper monitoring, and with developer money at stake, unauthorised tree removal could become even more common.

Biodiversity

"Improve biodiversity outcomes across the urban environment."

Biodiversity is not just held in trees. Birds and insects depend on all levels of vegetation canopy. On our Downer block, we (and previous owners) have cultivated a diverse garden with native and exotic plants. There is also room for fruit trees, a vegetable garden and a small lawn. In recent times we have observed over 50 species of birds, spiders and insects, including native bees.

There are substantial opportunities to promote biodiversity in the suburbs beyond just tree planting. How can this be encouraged?

Future Investigation Areas (FIA)

Even under the existing RZ1 planning rules, it is possible for the "open, leafy" character of a suburb to be radically altered over time with overly large single dwellings. The proposed rule changes, together with the new urban tree legislation, mean that it is difficult for the average resident to predict how the city plan will change things.

Even if RZ1 blocks are re-zoned for higher density, the rate at which this is taken up is highly uncertain. If the goal is to house a certain number of people within a given timeframe, this is a very blunt instrument. Many current RZ2 and RZ3 blocks in Downer and Dickson still have single homes on them. On balance, we feel there is time to see how the existing RZ2 and RZ3 zones play out, rather than rezone RZ1 blocks. The Goodwin retirement village will also add significantly to the population density of Downer.

We are in favour of RZ1 rule changes that make it easier to build secondary residences.

Future infill in Downer brings traffic issues to the fore. There should be some modelling of how the intersections of Pigot/Antill, Melba/Antill and Swinden/Northbourne will work. With the growth in density along Antill street, and the new Coles development, we suspect there will be problems.