

I strongly oppose the Inner South District Strategy proposal for extensive high density, high-rise densification of Yarralumla and Deakin.

Our homes are increasingly becoming our workplaces, which is placing a priority on leisure space around where we live. Why, at a time when there is an evidenced global trend for cities to leverage their green spaces for the benefit of their local communities would Canberra seek to fill in those spaces to the detriment of the whole community? To plan green spaces and leisure environments around individuals having to travel by road to enjoy such places is contrary to modern urban planning – other than, it would seem, Canberra's.

The community has received no evidence of alternative proposals being considered. This appears to be a strategy designed to benefit property developers at the cost of the wider Canberra community.

There is a lack of transparency in the planning and decision making process, a lack of accountability, and a lack of community engagement. Our green spaces make Canberra unique. They are what separates this city from all others. They are what attract people to live in this city. They are what makes this city special to live in. Why, when we already have such a special, unique environment, would we actively choose to destroy it?

A policy of in-filling the green spaces of Canberra is not about creating a city for the future, it is about destroying it.

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

[REDACTED]

Environment, Planning and Sustainable Development Directorate
GPO Box 158
CANBERRA ACT 2601

Dear [REDACTED]

I am writing to provide comments on the Inner North and City District Strategy.

The work that has been undertaken and documented in the Inner North and City District Strategy is acknowledged. The document establishes that the Inner North and City area has been doing the 'heavy lifting' when it comes to meeting the Government's planning policy of a compact city. This role of the Inner North and City District is anticipated to continue with the majority of dwellings taking the form of apartments/multi-unit development.

It is noted that this 'compact city' policy is being implemented by other planning jurisdictions. While much has been made of the proposed benefits -such as improved accessibility, opportunities for greater social interaction, increased socio-economic diversity, improved climate change as well as ecological and environmental outcomes - the provision of evidence by the Environment, Planning and Sustainable Development Directorate (EPSDD) that these benefits have been achieved would have been useful to support the continuation of the 'compact city' policy.

The issues raised about the changes made to the density of areas seems to focus on whether the increase in density will make Canberra better or worse and whether what makes the 'bush capital' will survive or be enhanced. According to Elizabeth Farrelly the 'answer to this turns less on whether density is good or evil, than whether it is done well or badly'¹.

In that context I would like to provide the following comments.

Local character

The District Strategies are intended to capture the special character of each of Canberra's nine districts and outline their respective future planning directions. The intention is to elevate the consideration of local character in planning decision making and to provide clear guidance to deliver planning outcomes. By capturing the key planning matters the District Strategy can provide clear guidance to help deliver planning outcomes.

Under section 10 of the Planning Act 2023 the principles of good planning include 'high

¹ Farrelly, E. (2021) *Killing Sydney. The Fight For A City's Soul*

quality design' which means amongst other things:

- Development should be focussed on people and designed to -
 - reflect local setting and context
 - have a distinctive identity that responds to the existing character of its locality
 - effectively integrate built form, infrastructure and public spaces

The value and importance of local character is recognised in other planning jurisdictions eg NSW Local Character and Place Guideline (February 2019) and Victoria Understanding Neighbourhood Character (Planning Practice Note 43 January 2018). These documents recognise the value of local/neighbourhood character in shaping the design and siting of new residential development.

While the Inner North and City District Strategy provides 'A future vision for the Inner North and City' there is little information provided which establishes what the 'landscape and built form character elements' are to be respected and protected and how these influence 'new development'.

There is no statement about the local/neighbourhood character and any reference to the historical planning strategies that have shaped significant areas of the District is limited. The community has provided EPSDD with feedback on what are the things they value most about the Inner North and City area, such as natural space, liveability, diversity of housing and lifestyle choice. This information has not been fully reflected in the draft District Strategy.

A statement of the local/neighbourhood character for the Inner North and City District needs to be included in the Inner North and City District Strategy. This will give substance to the desired 'future vision' of the area which can be used by developers and planners in preparing appropriate controls and design guides for future development.

A draft local/neighbourhood character statement using the information provided at the community engagement undertaken in 2021 on what people valued about the Inner North and City is at Appendix 1. I understand this document has been included in the PIA ACT Division submission.

The Inner North and City District Strategy rightly points to a range of external factors which need to be taken into account in how the Inner North and City area is developed. Local/neighbourhood character should have an equal place 'at the table' as it 'should guide how to manage a changing urban environment so that any changes are sympathetic to the valued characteristics'². Communities want to be proud about the places they live in and want to maintain the essence of what it is they value about the places they live in while accommodating a growing population. They also want a say in the conditions/controls that guide how buildings and spaces are developed.

² NSW Government (2019) *Local Character and Place Guideline*

Recognition of community input on draft District Strategy

There was significant community engagement undertaken in 2021 to establish what the community valued about each district. This work complements earlier community comments on Territory Plan variations; pre-Development Application community engagements; master/precinct plans and Neighbourhood Plans for sites in the Inner North and City area.

The key themes in Table 10 on pg 96 provides some feedback on issues raised in 2021. However, not all of the issues raised in the community feedback is reflected in Table 10. The following feedback (which I understand was included in the PIA ACT Division submission) should be incorporated in Table 10 as it goes to establishing what are the key features of the area and how these should be considered in both the existing and future desired character of new developments:

- there are insufficient community/recreation spaces
- green spaces should be protected and enhanced due to increased development/population/usage - these spaces need to respond to the needs of people/children from a variety of cultures/backgrounds/ages
- improved cycle/footpath connections are needed throughout the area not just between Yowani Golf Course and EPIC
- liveable design, diverse architecture, quality not compromised by density, greenspace vs density and climate resilient architecture are important if the Inner North is going to experience the levels of growth anticipated
- the issue of zoning focussed on the RZ1 area is not settled - with some supporting increased densities while others said keep RZ1 zoning to maintain the Garden City character/gardens
- local shops are loved and expansion of local shops should allow for variety of uses including live music
- affordable housing is needed for renters, people buying first homes and older people. Affordable housing should be included in diverse housing developments
- school sites/community land – these sites are needed to provide for the educational needs of a growing population and should not be sold
- there was support for housing diversity - people generally did not support large houses on individual blocks. There should be more 'missing middle' housing with more diverse housing types eg 3/4 bedrooms, townhouses

Community/recreation facilities

The increased number of people proposed for the Inner North and City will lead to more medium and high-rise developments consisting of apartments. These developments have featured a pre-dominance of 1 and 2 bedroom apartments, with families not necessarily being adequately catered for as noted in Easthope 2011³. Over time, a broader cross-

³ Easthope, H. and Tice, A. (2011) Children in Apartments: implications for the compact city *Urban Policy and Research* 29:4, pgs 415-434

section of people could be expected to live in the apartments, including families with children, creating a more heterogenous population.

The supply of community and recreation facilities has not kept pace with the increase in the population of the Inner North and City area. There needs to be adequate spaces and facilities for children, of various ages, that will live within such developments - replacing the backyard of detached dwellings. Some of this might be provided on site, but there will continue to be demand for urban green spaces outside of the private developments, which are accessible to the public that are owned, managed and maintained by the government.

Play spaces should meet the needs of people of all ages, such as older people, and people from different ethnic and cultural backgrounds, facilitating inclusion, recreation and health and crucial habitat for wildlife. Hassett Park at Campbell 5 is an example of a park that provides recreation opportunities for people of all ages cultural and ethnic backgrounds, set within the context of a dense development.

The Inner North and City District Strategy identifies a number of community/recreation facilities that are either planned or underway. A greater number of these facilities will be needed for the future population that will come to live in the Inner North and City area. It will also be important to retain the existing community and recreation facilities, especially the open space areas.

The Inner North and City Draft Strategy proposes that community facilities should be consolidated in town or group centres. While this is noted, not all community groups want access to facilities in town/group centres. While accessibility is an important factor, for some groups privacy would be a paramount consideration.

ACU/AIE Innovation Precinct

The Inner North and City Draft Strategy identifies 4 innovation precincts, including the ANU (in Acton), ADFA (in Campbell) and the UNSW/CIT precinct in Reid. These innovation precincts have been established for some time and have gone through/will continue to expand to meet continued demand. This is consistent with what other educational precincts have undergone elsewhere in Australia.

These institutions were established within areas set aside for that specific purpose and with a land use policy that supported the proposed use. They are owned by one organization and have been facilitated by government through funding and governance.

Universities have grown in response to increased demand, both from within Australia and also from overseas. In addition to the growth of educational facilities there has also been an increase in student accommodation, both on and off the campus, which is part of a package used to attract students to the university. Some industries have also sought to locate close to universities, using proximity as an opportunity for spillover effects (fostering knowledge and entrepreneurial activity), to gain increased knowledge as well as to attract workers.

Little information is provided in the draft Inner North and City District Strategy about what the ACU/AIE Innovation Precinct will entail. It will require the acquisition of leased residential and a change to the zoning policy to allow educational, commercial, retail and

cafes/bars – as most universities have these days. This development will introduce a range of different impacts on the surrounding area, which will need to be explored and understood. It also changes the fabric of the suburb, which could allow for further changes to be introduced, depending upon the success of the innovation precinct.

Social and affordable housing

There has been considerable debate and commentary on the need for more social and affordable housing and that the planning system should facilitate more such housing. The Inner North and City District Strategy refers to social and affordable housing in the context of:

- 15% of new residential land releases being allocated to affordable, community and public housing
- the Build To Rent prospectus for land in Turner and in other locations
- planning for a diversity of housing types and land supply
- increasing the share of all dwellings that are public housing

The Inner North and City area has a long history of supporting social and affordable housing, which was reflected in the comments made during the 2021 community engagement. The nature of public housing properties has changed somewhat with the redevelopment of public housing properties along Northbourne Avenue, in Civic and the public housing properties along Ainslie Avenue identified as a possible key site and change area.

It is understood that planning is but one component of the puzzle that is needed to provide more social and affordable housing. It is clear that the private market has limited interest in supplying housing for this market.

The PIA 'Role of Planning in Housing' Position Statement 2022 points to various areas that planning systems can influence:

- conditions for good amenity, open space, social infrastructure
- mandating the supply of social and affordable housing (as is done with adaptable housing under the current Territory Plan)
- the locations and places for social and affordable housing
- the retention of existing affordable and social housing dwellings

These issues should be addressed within the Inner North and City District Strategy and as necessary included within the Territory Plan.

Dual occupancies

As part of the community engagement on the District Strategies, EPSDD is seeking community input on increasing the number of dual occupancies within established areas. In doing so reference is made to DV343 for the Mr Fluffy surrendered blocks as providing an example of how dual occupancies have been introduced into established suburban areas.

While DV343 was focused on reducing the cost of the Mr Fluffy program, it serves as a useful example of how change can be introduced into suburban areas. Based on a preliminary examination of the data available on the EPSDD website within the Inner North:

- 111 Mr Fluffy block were located in the Inner North

- 102 blocks were zoned RZ1 and 6 zoned RZ2
- 52% (58 blocks) had a single dwelling built on them, 25% (28 blocks) had a dual occupancy constructed
- There were 26 blocks with an area between 700m² and 799m² of which 7 had a dual occupancy constructed.
- Apart from size, no blocks were excluded because of factors such as topography, orientation, being a corner block, battle-axe block etc
- the existing dwellings were demolished
- blocks above 700m² were capable of being unit titled
- the land was sold by Government through a competitive process after it had demolished the dwellings
- there were some design controls but not too arduous eg no multi-storey. high quality design standards and different plot ratio restrictions were one of the dual occupancy dwellings did not front a public road

These figures provide some indication of the interest in dual occupancies under DV343 in the Inner North.

The introduction of sub-divided/unit titling of dual occupancies has attracted high levels of community interest. The District Strategy is the tool which should be used to allow the local character to shape planning policies for dual occupancies. At the moment the Inner North and City District Strategy contains little information about the character of the district which could be used to establish a meaningful position on dual occupancies within the area. The Local Character Statement at Appendix 1 provides a start of a document which would set out a framework to progress planning policies in the Inner North and City District such as dual occupancies.

Thank you for the opportunity to provide input on the Inner North and City District Strategy. If clarification is needed on the issues raised, please do not hesitate to contact me at

2 Mar '23

LOCAL CHARACTER STATEMENT FOR THE INNER NORTH

The local character of the Inner North is typified by:

- The visual backdrop formed by Mt Ainslie, Black Mountain and Mt Majura
- Suburban streetscapes
 - Mature and impressive trees
 - Large verges
 - Wide streets
 - An integral part of the settlement pattern
 - Combine with garden plantings to give the impression of a continuous tree canopy
 - Deliver a high level of environmental and sustainable outcomes
- Housing is generally low rise, single storey that provides a high level of amenity and sustainability
 - Setbacks between houses are generous
 - Distances between houses are generous
 - Buildings relate to the street
 - Blocks tend to be generous in size
 - Soft areas within blocks to encourage landscaping
 - Limited medium/high density
 - Respects the garden city and Griffin legacy
- High level of community facilities eg education, centres/halls, health, religious/spiritual, sporting, recreation
- Diverse housing choices for a diversity of tenures including high levels of public, social and affordable housing

Considering the:

- Information/data provided in the Inner North and City Draft District Strategy
- Community engagement undertaken in 2021
- Previous community engagement undertaken by EPSDD about the character of various suburbs in the Inner North

the future of the Inner North and City District Strategy should recognise that neighbourhoods include the following elements:

- Never static but need to respect the past, acknowledge the present and be flexible and able to respond to future demands including dual occupancy developments
- Uplifting, inspiring and liveable
- Contain an extraordinary range of public spaces that attract people to meet, relax and celebrate

- Typified by low density, single storey family dwellings with some low-rise multi- unit developments in suitable locations such as around local centres and along public transport routes.
- Limited high-rise developments principally in core areas such as along major avenues eg Northbourne Avenue and Ainslie Avenue; the City area, Dickson Group Centre
- High quality residential development that:
 - Is sympathetic and appropriate to the existing garden suburb character in terms of scale, material, detailing, form and landscape setting
 - Respects the architectural rhythm of the streets with an architectural consistency
 - Provides affordable, public and social housing that meets the needs of people/families of multiple backgrounds, ages and incomes
 - Is not compromised by density
 - Delivers more housing diversity eg townhouses, row houses
 - Is climate resilient
- Continue a sense of well-being and amenity that recognises the local context and functional requirements of the community typified by:
 - A feeling of safety and security
 - Places suited to meet the needs of most people
 - A mix of private and public housing
 - Good footpaths and bike paths
 - Well-designed streetlighting
 - A good social mix
 - Has adequate car parking for residents and visitors
 - Recognises that landscape elements on private and public land are critical in continuing the extraordinary landscape character of the area
- Continue to provide a high level of community and recreation facilities
 - Improvements to existing or new community and recreation facilities to meet increasing demand
 - No community and recreation land being sold
- Continues the proud history of the Inner North and City of being inclusive
- Urban/open spaces areas are retained and enhanced for community/recreation/environmental/sustainability purposes
 - Not compromised by high-density development
- Creates a cohesive community where people of a mixed age, income and cultural backgrounds will be safe and settled
- Respects and values the contribution of Aboriginal and Torres Strait Islander peoples to future planning and development

There are substantial areas of the Inner North whose local character has been recognised through registration on the ACT Heritage Register. This process delivers a document that sets out specific features which set these areas aside from adjacent neighbourhoods and control what built form is permitted.

Feedback – Draft Molonglo Valley District Strategy

Dear Sir/Madam,

I am writing to bring to your attention the urgent need for a dedicated place of worship for the growing Muslim population in Molonglo Valley. With over 1000 Muslims living in Coombs, Wright, Denman Prospect, and Whitlam, it has become increasingly important to establish a place of worship where they can gather and perform their religious duties.

Furthermore, according to the latest population projections from ACT Treasury, the population of Molonglo Valley is expected to grow significantly in the future. Therefore, it is imperative that the government takes proactive steps to provide necessary facilities to cater to the diverse needs of the community.

We are therefore requesting the ACT government to allocate a piece of land where we can build a place of worship for our Muslim community, along with other community services that can benefit the wider community. We are confident that this will not only provide a space for our community to worship and practice their faith, but also contribute to the overall wellbeing and social cohesion of the area.

We would be grateful if you could take our request into consideration and allocate a piece of land for this purpose. We are willing to work with the government and community members to ensure the establishment of a place of worship that meets the needs of our community, as well as any regulatory requirements.

Thank you for your attention to this matter.

Sincerely,

[Redacted Signature]

[Redacted Title]

[Not-for-profit Community organisation, serving the needs of the community]

Consultation topic:

Woden District draft strategy

Submission by:

[REDACTED]

Date submitted:

Friday 3 March 2023

Summary

As concerned Woden Valley residents, **we wish to lodge our strongest objection** to the planned new Curtin edge street currently depicted as running along the south side of Yarralumla Creek in the [Woden Draft Strategy](#). Our rationale to support and justify a total re-think of the planned edge street location is as follows. Included in our submission is a proposed alternative development solution which we believe would still support the *Sustainable neighbourhoods* driver without compromising on the “*Blue-green network*” imperative.

1. Yarralumla Creek cycle route (C4) provides a safe, off-road active travel alternative to driving

The Yarralumla Creek cycle path is one of only two off-road major active travel arteries connecting Woden to Central Canberra and beyond. Hundreds and hundreds of people use this route daily: active commuters, runners, kids cycling to/from school, parents accompanying their kids to/from school, people with a disability. By design, this green corridor is both inclusive and accessible to all active Canberrans. The proposed Curtin edge street appears to be in stark opposition to the ACT Government encouragement of active travel.

CBR Route C4 is so much more than just a cycle path - it is a *Kambri*, a meeting place for the ramblers, pram pushers, dog walkers and like-minded nature-loving members of the broader Canberra community who moved to our infamous bush capital for exactly this reason.

The cycle path, walking track and Yarralumla Creek itself are all acting as ‘natural buffers’ – a purpose built edge street to *define the urban boundaries* is therefore both unwanted and redundant.









2. Yarralumla Creek reserve area is subject to flooding, precluding any road or residential development

According to an [ABC Report](#), last year's floods in Queensland and New South Wales are on track to be one of Australia's worst-ever natural disasters. And if this news isn't bleak enough, we can expect more extensive and more frequent flooding as climate change intensifies. Extreme events are becoming 'ordinary' and are going to get more common under climate change.

With the frequency and severity of La Nina's increasing, the risk of widespread flooding is rising exponentially. The below photos and [video](#) were taken during a recent downpour – not a super storm, nor a rain bomb, just a 'normal' heavy shower. As you can see, the rapidly rising stormwater is breaking the creek banks and is moving at pace. This is a known and signposted flood zone. Noting that ACT Government and Emergency Services vehicles can and do already access this area, as and when required, without the need for a concrete road to be constructed.

The flood plain area on either side of Yarralumla Creek must be respected and kept in its natural state – no developments, no edge roads.





3. Planting new trees cannot mitigate the climate impact from needlessly demolishing hundreds of mature trees

The dense and diverse pockets of well-established, majestic trees along Yarralumla Creek reserve provide much needed cooling. Sapling trees planted over the last few years by the ACT Government have either withered away from drought or neglect, or will take years, if not decades, to provide any modicum of shade protection.

To fight against climate change, [we need our trees now](#) – not in the ten or fifteen years it takes for them to be fully grown. *The best time to plant a tree is twenty years ago. The second best time is now* — Chinese proverb

The below photos provide supporting evidence of struggling newly planted saplings compared with the shade providing, mature trees that are part of Curtin's heritage and must be protected.

The proposed bulldozing of mature trees, not to mention the unconscionable loss of habitat for endangered birds and reptiles, just to build an artificial 'edge street' is in complete contradiction to the ACT Government's environmental policies and blue-green networks. Losing this existing treed open space is unacceptable.







4. There are alternative development solutions with less environmental damage and climate impact

As outlined above, the southern side of Yarralumla Creek is a highly used, well-loved green space lined with mature, cooling trees. Existing DIY tree swings and family swing-sets show the community's appetite for having children's facilities in this space. Developing play areas, installing exercise stations, and incorporating picnic areas that are sympathetic with the surroundings and dotted along the Yarralumla Creek reserve would be welcomed.



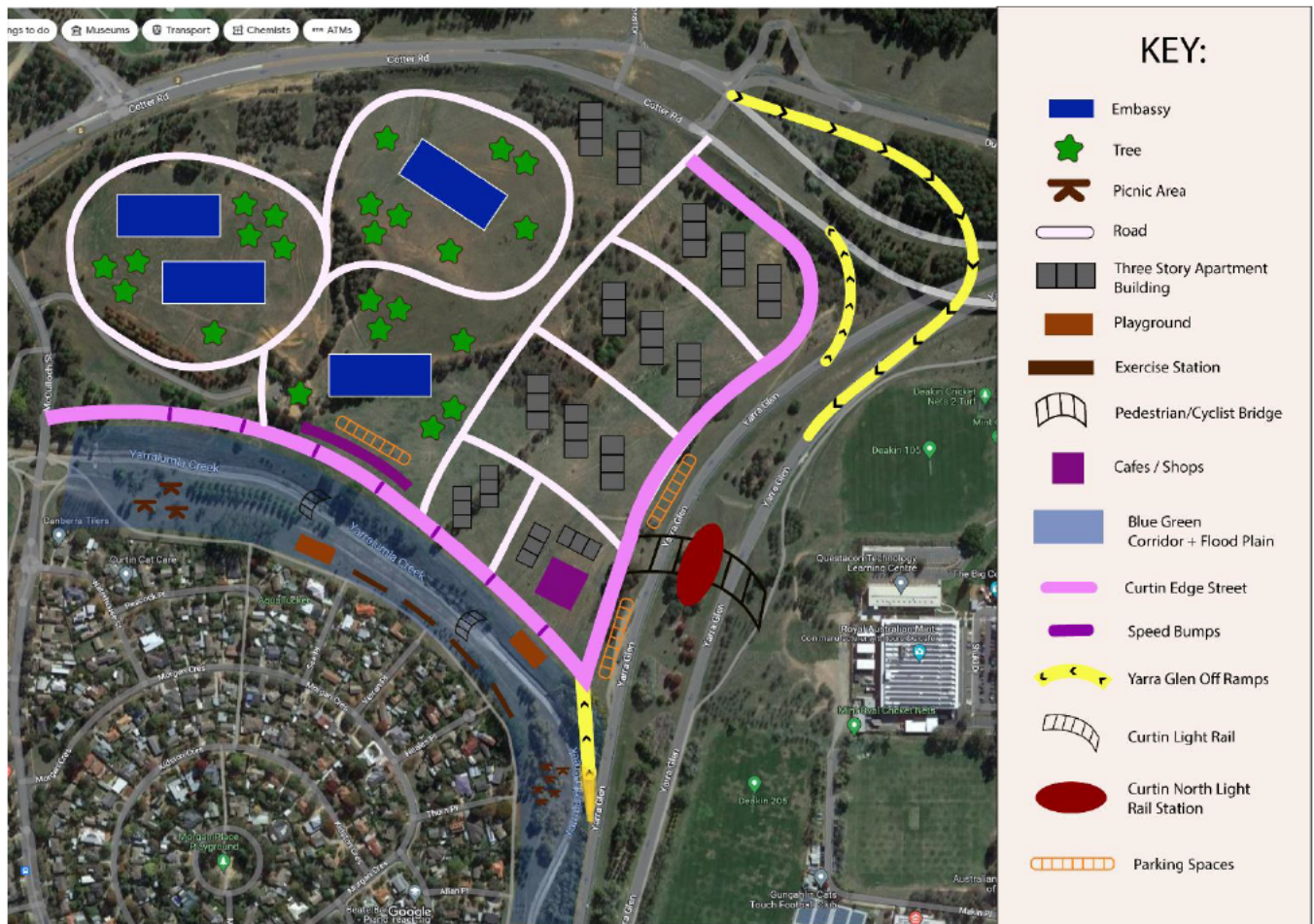
In stark contrast, the northern side of Yarralumla Creek (the former Curtin horse paddocks site) is unkempt wasteland. If an 'edge street' is deemed necessary to demarcate an arbitrary boundary, then **it should run on the north side of Yarralumla Creek**. This site is being demolished anyway to make room for new residential housing and embassies so building a supporting road network running on the same side of the creek makes much more sense.



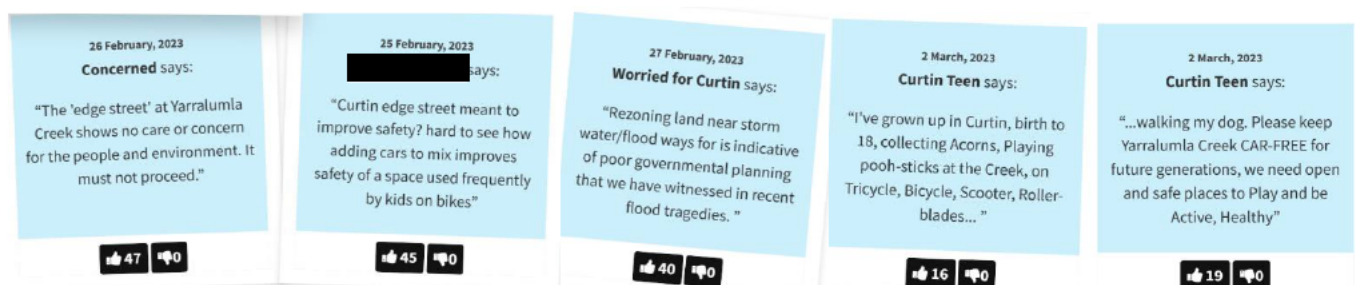
We would therefore like to propose the below revised principles for consideration, illustrated by our mock-up plan:

Develop and urbanise the northern side of the creek to create a new residential and local centre - Curtin North

Protect and enhance the southern side of the creek to leave Curtin as we value it - trees, green space, and heritage



Minister Gentleman, in Australia we are fortunate enough to live in a democratic society not a communist regime. If the community consultation on these Draft District Plans is genuine and not a tokenistic tick-the-box exercise then all planning alternatives need considering and evaluating. As you will note from the hundreds of comments left on the [YourSay Conversations site](#) – a few screen grabs below for your reference – 100% of the Woden Valley community are strongly against the planned Curtin Edge Street. Should this Edge Street proceed in its current proposed format, unmodified despite countless substantiated objections, it makes a complete mockery of the community engagement process. You have the opportunity here and now Minister Gentleman, to show that the ACT Government is committed to sympathetic urbanisation rather than hamstrung by greed-motivated developers.



ABANDON ALL FUTURE INVESTIGATION AREAS FOR REZONING FOR HIGHER DENSITY DWELLINGS

SUBMISSION UPDATED WITH ADDITIONAL NAMES AND COMMENTS

(see in BLUE highlight) from first version sent through 02/03/23.

ABANDON ALL FUTURE INVESTIGATION AREAS FOR REZONING FOR HIGHER DENSITY DWELLINGS

A resounding no to any 'future investigation' in inner north garden suburbs (eg. Reid, O'Connor, Turner). The *Draft District Strategy (Inner North and City)* does not acknowledge that these are established suburbs, with established and detached (and duplex) housing that are people's homes and neighbourhoods. People have worked hard to purchase into these suburbs for their neighbourhood and garden appeal. We have a particularly strong objection to the proposed 'future investigation' of Amaroo Street and Booroondara Street (Reid).

The ACT Government should abandon all future investigation areas in the inner north with established housing (this includes Turner, O'Connor and Reid). Reid should be kept as a garden suburb and no changes should be made to allow for medium to high density rezoning (including specifically Booroondara and Amaroo Streets).

The existing detached housing (and duplexes) are part of these neighbourhoods with real families who call these areas home. They would be displaced with any rezoning, and the impact on the neighbourhood would be significant on a number of measures. This submission is supported by Reid residents **(name and address on final page --- DETAILS TO BE DELETED IF THE SUBMISSION IS MADE PUBLICLY AVAILABLE).**

Key points and concerns with respect to the future investigation area of Amaroo and Booroondara (and more broadly for established garden suburbs of Reid, O'Connor and Turner):

1. **Densification should occur in greenfield sites or areas already zoned for medium to high density**
 - a. Reid as a garden and heritage suburb, has already been compromised with apartments on Constitution Avenue and Wester aspects of Reid. No more densification!
 - b. Allowing the opportunity for people's homes to be destroyed, for communities and neighbourhoods to be destroyed, particularly in established and iconic Canberra 'garden' suburbs would be an assault from government to the city and its citizens.
2. **Rezoning Reid from detached housing to allow for medium and density housing will impact the heritage, character and nature of the inner north**
 - a. The protected English Oaks in Booroondara (best avenue in Canberra), the special significance status of the trees, the hedging requirements of front boundaries would all be potentially impacted with property demolition, new construction, new facilities, increased foot and road traffic and new infrastructure
 - b. Increased density of housing will severely encroach on the garden nature of Reid
 - c. Any rezoning in Reid will destroy the early heritage ambience of the suburb. This includes Booroondara and Amaroo – while the southside is *not* heritage listed, Booroondara faces *into* the heritage side of Reid. This street overall still reflects the garden nature of Reid and any apartments built here would encroach on the heritage side residents. Neighbours would not see the proposed changes/future investigation areas as 'medium' density. Allowing for 3-6 storeys would be high density for heritage homes on single block properties
 - d. Rezoning the very little remaining low density housing in the inner north suburbs to allow for medium to high density would not *enhance* the garden suburbs – it would ruin it
 - e. Reid is one of the few remaining handful of suburbs in Canberra that has a genuine, real history. It should not be 'ringbarked' by rezoning and densifying on its edges. It will destroy the essence and character of Reid.
 - f. Inner North garden / RZ1 suburbs need to be *protected*, not torn apart with densification
 - g. There should not be any future development, or investigation in established detached housing. This includes duplexes on Amaroo and Booroondara. These form part of the history and heritage of Reid.
 - h. Rather, existing community protections should be maintained and strengthened to preserve the character, nature and history of these suburbs
 - i. The ACT Government should make every effort to *preserve* these residential areas. Be innovative and sustainable instead of destroying RZ1 garden suburbs
 - j. Canberra is known for being a garden city – do not turn it into a Sydney or Melbourne

ABANDON ALL FUTURE INVESTIGATION AREAS FOR REZONING FOR HIGHER DENSITY DWELLINGS

- k. Proposal to rezone RZ1 Booroondara-Amaroo Street in Reid dismisses the Reid character of the dual occupancies, which is a part of its history, story and charm. The duplexes on these streets are part of the essential character of Canberra. This should be celebrated and preserved, not torn down
- 3. **Rezoning Reid from detached housing to allow for medium and density housing will impact the citizens**
 - a. People, families, residents, taxpayers are currently residing in the proposed future investigation areas. These are people's homes and communities. The disruption to their way of life, that they have purchased (or rented) into, and invested significant time and money in building their homes and communities will be significant and detrimental
 - b. There would be significant impact on sun due to the solar envelope being taken up with the medium to high density builds
 - i. This has a real and specific impact on people and flora and fauna
 - ii. Many heritage homes in RZ1 garden suburbs (such as heritage side of Booroondara) are low EER due to the old, heritage nature of the homes. To be losing any further sunlight or warmth would impact the ability to maintain warmth in these houses which is essential in winter, and in old homes that are not well insulated. Residents would have to increase heating measures thereby impacting environmental savings targets and reducing quality of life (particularly for many Reid residents in detached housing who are of an older age bracket)
 - iii. Residents' would lose significant privacy from the high rise nature of the buildings
 - iv. In addition, the protected trees and trees of significance would be similarly impacted with the solar envelope being compromised
 - c. The garden suburb nature of Reid and other areas cannot adjust to the influx of a high density population. Reid currently has 1500 residents (approximately). Allowing for medium to high density would more than outnumber this
 - d. The parking and car traffic would be significant including noise control, congestion, school overfilling
 - e. Inner north schools are already overcrowded – it is unsustainable to double the Reid population (for example) when current schools are over capacity. Densification will further strain public services that are under performing
 - f. Proposal to rezone RZ1 Booroondara-Amaroo Street in Reid dismisses the many families who have worked hard to purchase into Reid (and say, could not afford a single dwelling thus opted for a duplex). By redeveloping this area, the ACT Gment is harming families who have only managed to purchase a dual occupancy rather than a single dwelling in Reid.
- 4. **The Draft Strategy does not accurately or honestly set out the proposed changes:**
 - a. The Draft Strategy indicates that future investigation site/s will allow for 'medium' density of between 3-6 storeys (pp.115-116, p.129, p.132-133). Allowing for 3-6 storeys would rezone the RZ1 area/s to RZ4-5 (otherwise known as medium to **high density** residential zone, between 3-6 storeys). Rezoning Reid (and similar garden suburbs) from RZ1 to RZ4-5 is a significant change and there would be a significant public outcry if the Draft Strategy was clear and candid about the proposed changes
 - b. The draft strategy does not employ the use of high resolution images to give a clear enough indication of the proposed changes and impact. The information set out for citizens is unclear, vague and forces citizens to look for a needle in a haystack
- 5. **Rezoning established garden suburbs with established homes (such as Booroondara Street and Amaroo Street) is an unsustainable and unsuitable option for densification**
 - a. Other densification options should be considered – such as densifying the city, greenfield areas, existing RZ3 areas and up, spreading development over unused land across Canberra, including expanding Canberra's borders (a 30 minute commute is still entirely reasonable compared to Sydney or Melbourne)

ABANDON ALL FUTURE INVESTIGATION AREAS FOR REZONING FOR HIGHER DENSITY DWELLINGS

- b. Rezoning existing inner north RZ1 suburbs is not an appropriate option given the negative impact on many measures. Do not rely in inner north to meet the growing housing needs
- c. The proposal to rezone is fundamentally incompatible with the inner north tree canopy and garden suburb principles and values
- d. It is an unsustainable and misaligned option for the ACT government to propose that a few blocks of houses in RZ1 garden suburbs can be rezoned to meet the housing needs of our growing city. Whatever happened to Canberra being the garden city? What is the point of regulations for the garden suburbs? Having a heritage side of Boroondara facing into densification development will ruin the façade, community, neighbourhood, etc

6. No real consultation has occurred.

- a. Real consultation must happen. The ACT Government should engage in genuine consultation and dialogue through improved processes and timeframes
- b. For the proposed changes (which are significant), an online link to the draft strategy (and low-resolution maps with only high level detail) and a few pop ups and one online session cannot justifiably demonstrate genuine engagement and consultation with the community.
- c. The ACT Government must be clear about it's proposed changes (eg. RZ1 to RZ4-5) and put signs up (including letter drop box with clear language) in the proposed future investigation site/s, with multiple pop ups being held within those local areas over a sufficient period
- d. Residents of Reid have commented that the 'consultation' process has made them feel 'steamrolled', 'bullied', 'overwhelmed' (including from the unclear messaging and difficulty in extracting the details in the draft strategy). Residents have expressed that they have no confidence that the government will hear their views and instead has a bias and preferential relationship towards developers and money
- e. Please do not ignore the community. The quick comments on 'have your say' make it clear that residents do not supported future investigation sites.
- f. If ACT Government were to continue to consider these areas for future investigation, it would be demonstrating from the feedback received from the (poor consultation process). It is clear from the community's comments that the proposed changes are not welcome

7. Real people, real lives. No trust in government

- a. The following comments are from Reid residents when signing this submission (petition!), and it captures the sentiment shared by many:
 - i. *"I am strongly opposed to any rezoning of Reid which is very much part of Canberra's early history. The current ACT Government appears bent on destroying green areas and replacing them with hundreds of boxy apartment buildings – some of which look like slums from the moment they are constructed. Reid is a beautiful suburb. We have been residents since 205 and paid a high price to buy into a suburb that retains a sense of history and heritage. To build a three to six storey buildings on Amaroo and Booroondara Street seems to me like the thin edge of the wedge in that over time this Government will seek to crowd out the remaining heritage housing. Why has the Heritage Commission been abandoned – there was at least some independent third party to fight for retention of Canberra's early homes. Many people, including us, have spent a great deal on converting these early homes into residences with more modern amenities. We do not want to be surrounded by buildings filled with little boxes"*
 - ii. *"Remaining streets in Reid must be left alone by rezoning and densification, including Amaroo and Booroondara. Otherwise why do we have government endorsed heritage preservation at all? It seems that in their inexorable thirst for quick money, the government appears to want to eat their cake and have it too"*
 - iii. *"I like many others in the area proposed in Reid for future medium density development, have spent over \$1M restoring and adding value to my home. I will strongly resist overtures to purchase my house."*
 - iv. *"Who wants to live under a six storey building like in St Kilda, Melbourne? Not me."*

SIGNED, [REDACTED]

ABANDON ALL FUTURE INVESTIGATION AREAS FOR REZONING FOR HIGHER DENSITY DWELLINGS

SUPPORTED BY REID RESIDENTS (noting there would be more names if we had more time – we only found out about this draft strategy within the last week):

A horizontal bar chart titled 'U.S. should take action to protect the environment'. The y-axis lists age groups: 18-29, 30-49, 50-69, 70+, and 'Total'. The x-axis represents the percentage of respondents, ranging from 0 to 100 in increments of 10. The bars show the following approximate percentages: 18-29 (95%), 30-49 (85%), 50-69 (92%), 70+ (75%), and Total (88%).

| Age Group | Percentage |
|-----------|------------|
| 18-29 | 95% |
| 30-49 | 85% |
| 50-69 | 92% |
| 70+ | 75% |
| Total | 88% |

| Device Type | Percentage of Respondents |
|----------------------|---------------------------|
| Smartphone | 88% |
| Tablet | 72% |
| Smartwatch | 65% |
| Smart TV | 58% |
| Smart Home Assistant | 52% |
| Smart Car | 45% |
| Smart Thermostat | 38% |
| Smart Lock | 32% |
| Smart Doorbell | 28% |
| Smart Light Bulb | 22% |

Comments on the New ACT Planning Framework with reference to District Strategies and the NEW Draft Territory Plan

As a resident and ratepayer in Yarralumla I make the following submission regarding the New Draft Territory Plan and the District Strategies.

Having lived in Yarralumla for approximately 25 years, it is my opinion that the suburb itself has its own unique character. It exhibits heritage characteristics – having been part of Canberra since very early days, and biodiversity characteristics – in that its open spaces are settled environments for a large volume of wildlife. These characteristics are highly regarded by residents and visitors alike and should not be disregarded before there is extensive local resident and public engagement in the development of effective and transparent mitigation strategies. This engagement should be coordinated through the local resident's association, in this case the Yarralumla Resident's Association (YRA)

Regarding the suburb of Yarralumla itself, existing road, shopping, and parking infrastructure is already at its limits. Increased densification will increase congestion in and around Yarralumla, particularly in the shopping precinct. It is on this basis that these changes to the ACT Planning Framework and the District Strategies are not supported. The proposals will harm both the environment and the character of Yarralumla. It is important that this character and environment be protected for future generations.

Over the last few years, the Canberra brickworks redevelopment proposal has been approved. There is also the proposed development of the CSIRO forestry precinct. Together they will add almost 50% more people to this suburb. Surely this is sufficient pressure on a suburb like Yarralumla. It is already apparent that existing and planned infrastructure will not cope with this influx. Further development is simply not warranted.

Consultation on the Planning Bill 2022 has not been adequate. It is acknowledged that community feedback on these matters did occur during consultations in 2021. But from this proposal it is clear that the issues raised regarding the Draft Inner South District Strategy (particularly P 91) have either been inadequately considered or have been ignored. The issues raised during these consultations remain relevant.

It is requested that there be genuine consultation with resident groups before the Planning Framework is approved. This is to ensure that the best possible planning outcomes be achieved for both government and residents.

In conclusion, I do not support the NEW ACT Planning Framework and the District Strategies as they relate to Yarralumla.

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3 March 2023

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3 March 2023

DRAFT TERRITORY PLAN AND INNER SOUTH DISTRICT STRATEGY

GENERAL COMMENTS

1. Many of the documents presented for comment lack basic referencing systems including page numbers, Paragraph Numbers, Section Names, Indexes, Contents pages, Cross References to other documents in the set, and use of defined terms. These quality issues render the documents as not fit for review. Consequently, all documents should be placed on hold until they meet these minimum standards, and then they should be released to the community for a six-month review period. If for example one was to compare it with the development of the communications act federally in the mid 1990's to ensure industry competition, consultation periods were of this order duration.
2. The government's proposal for an outcomes-based approach is not unique in planning or any other endeavor. To suggest that fewer rules or specifications, or indeed simplification are needed to implement an outcomes based approach is not based in logic, nor is it supported by experience in any other professional discipline. For example, Defence adopts an outcomes based approach to its delivery of new capability, but does not attempt to water down specifications or procedures to achieve those outcomes.
3. The various district strategies assume massive growth for Canberra, and massive intensification of land use in existing suburbs are both required. No overall strategy is provided that provides an assessment of where it is best to have intense development in Canberra, if at all. For example, newer suburbs could be more intense and older suburbs less intense. There is no justification provided for intensification in older suburbs apart from more people will work there so more people will need to live there. The obvious answer to this is not to build additional factories and offices in the inner south and then you wont need to build more dwelling on the existing land.
4. The draft Territory Plan relies too much on subjective assessment. It should have clear, quantifiable measures to achieve each outcome. It should have well defined processes for design requirements, assessment, transparency and consultation, and appeal rights.
5. The draft Territory Plan and supporting documents do not meet the stated purpose of a clear and easy to use planning system. The multiplicity of documents and their complexity make them difficult to understand, to administer and to evaluate.
6. As currently proposed, Technical Specifications, Design Requirements, and District Strategies are not subject to change management through the Legislative Assembly. This subverts an possibility of oversight of Planning Administration by the Assembly and community.
7. 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 limitations, and protection of the character of existing suburbs in the Inner South.

8. The proposed Territory Plan does not provide for these key characteristics of a livable environment, so the Government must make such key requirements of concern to residents mandatory and include them in the Territory Plan rather than in Technical Specifications and Design Guides which create uncertainty as to outcomes.
9. The proposed development assessment system should comply with nationally agreed benchmarks, namely the 'Development Assessment Forum' (DAF)'s 'A Leading Practice Model for Development Assessment in Australia'. Currently, it does not.
10. Proposed changes to mandatory requirements in the Territory Plan should be treated as a major amendment, with appropriate notification to the Legislative Assembly and provision for the amendment to be disallowed if the Assembly considers that to be the appropriate action.

INNER SOUTH DISTRICT POLICY (ISDP)

11. The document suffers from all the quality issues outlined above in Paragraph 1.
12. The document includes the Map component from the Red Hill Precinct Map and Code but not the Rules (Code) part. This has the effect of permitting land in The Parks development that is not fully developed to 6 storeys and 21.5 metres high.
13. Red Hill is omitted from most of the tables in the ISDP document, which means default specifications from the Technical Specifications and other codes apply, enabling open slather for developers and for the government to rezone land at will.
14. The ISDP should state no more intensification in Red Hill, as there has been no assessment of the impact of putting 20% of the dwelling in Red Hill on 3% of the residential land.

DRAFT INNER SOUTH DISTRICT STRATEGY

1. The areas for further investigation in Red Hill suggest intensification of housing in an area approximately twice as large as the current “The Parks Red Hill Development” . This is unsustainable from a parking, transport, storm water management, sewerage, and livability perspective.
2. There must be an evidence-based, more rigorous methodology for projecting population increases in the ACT and hence the number of additional dwellings required annually, and their best location from an overall outcomes’ perspective.
3. A clearer evidence base is needed for the proposed Transect approach to Urban Character Types (eg General Urban, Urban Centre, Urban Core), and how it informs the building heights shown in the Sustainable Neighborhoods maps, how it would interact with the zoning provisions in the Territory Plan, and how it will ensure resilience in the face of a warming climate, including through the provision of adequate green space and tree canopy cover to prevent heat islands. A regularly updated heat-map is required to provide evidence that developments do not lead to temperatures harmful to health.
4. Instead of random upzoning in a district, it is preferable to have structured community engagement to ensure co-design of precinct scale developments, and then improvement of processes between participating Government agencies, the private sector and the community to deliver the redevelopment of precincts in a timely way.
5. The ACT Government must use a genuine and well-structured, rather than “rubber stamp”, community engagement and co-design approach on the district strategies, including by promoting the community engagement processes widely, at accessible times and places, with reasonable timeframes for comment, and by providing good quality, high resolution maps and other information to support the community in providing better informed feedback. This is especially important in view of current community feelings of disempowerment and the experience of not being listened to.
6. We consider that the identified primary and secondary liveable blue-green network does not fully capture the high value biodiversity network in the inner south, and needs more work.
7. More work needs to be done to identify ways of improving transport access by making it easier for people to get around by car, by public transport or by active travel.

[REDACTED]
[REDACTED]
[REDACTED]

Submission on the draft East Canberra District Strategy

[REDACTED]

[REDACTED]

3 March 2023

Thank you for providing the opportunity to provide feedback on the draft district strategies.

The current *draft East Canberra District Strategy* aims to reflect the community's views on future planning priorities and aims to help manage growth and change in the district, while protecting the things the community values most.

I wish to make a few comments about the possible changes mapped for the *Majura Valley, to the north of Canberra Airport*.

What the community of Canberra values greatly is the diversity of land uses across the territory. We are very lucky to retain this diversity across a relatively small landscape. We are also blessed to have such a large proportion of the territory in national parks and nature reserves.

The Majura Valley provides Canberra's community with invaluable access to a rich agricultural and viticultural district.

The valley provides many benefits to the community, including:

- Agricultural produce, food and fibre, including high value market garden vegetable produce, eggs, lamb, beef, olive oil, wine, corn, truffles and flowers.
- An invaluable link for the urban community to contemporary and historic agricultural landscapes.

Majura House, spanning the banks of Woolshed Creek, is the first agricultural property in the region, established in the mid 1840's, well pre-dating the settlement of Canberra. This property is sensitively managed, with minimal impact farming and cell grazing methods, tree planting and community engagement activities.

The recent engagement period, where community were invited to visit and experience the 2022 sunflower crop and contribute to charity through the sale of the produce, not only contributed to community charities, but gave many of Canberra's families invaluable experience and connection to their territory's agricultural present and past.

These engagement events will, I understand, become ongoing seasonal events for the district and will be incredibly well supported by the Canberra community.

This farm, managed as an agricultural asset *for over 175 years*, with its heritage buildings and farm infrastructure provides an irreplaceable asset to Canberra.

The draft plan proposes that possibly converting these areas along the Majura Valley into new employment precincts, freight routes and freight hubs will contribute to protecting aquatic habitats and environmental values along Woolshed Creek.

I *strongly reject* this premise. To say that a freight hub and corridor will protect the riparian habitat of Woolshed Creek and other environmental values, more than an environmental and *landcare award winning low impact farm*, suggests that the draft plan's objectives have been confused and misrepresented.

What the agricultural and viticultural producers of the Majura Valley need (and I strongly believe the Canberra community want) is longer term leasehold security, not the threat of zoning changes and development impacting this valuable area.

I strongly recommend that the draft East Canberra District Strategy is amended to reflect the protection of this agricultural and rural asset for Canberra; producers are given long term security to enable them to strategically plan the management of the area and community are able to continue their connection with a significant and beautiful part of their territory.

Yours sincerely

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Submission:

Inner North and City Draft District Strategy and Draft Territory Plan 2022

| | |
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This submission contains comments on various draft district strategy documents with a focus on the inner north strategy and some issues that I believe deserve more of an airing in the final document.

The submission also contains feedback on the consultation process and opportunities created for the latest round of engagement (I participated in a number of them).

3 March 2023

Abbreviations:

| | | |
|------|---|--|
| DA | = | Development Application |
| DV | = | Draft Variation |
| EDP | = | Estate Development Plan |
| FIA | = | Future Investigation Areas |
| INDS | = | Inner North and City Draft District Strategy |
| TP | = | Draft Territory Plan |

Introduction

- 1 This submission is barely able to touch on the claims made in, and the issues, queries, and questions arising from, the Inner North and Draft District Strategy (INDS) and the Draft Territory Plan (TP), for reasons mentioned at I and II below.
- 2 As occurred with the 2022 draft planning bill, the INDS and TP have been presented to the broader interested community with only minimal and poorly notified education and 'engagement' processes opportunities, and support
 - this is not helped by such significant documentation, seeming to be written and timed as a 'fait accompli' exercise for implementation within a very short space of time
 - the documents' complexity, linkages to the bill and to each other, layering, and all concomitant processes - for planning authorities, developers, and community alike - are far from clear because they are not easily findable across the hundreds of pages of material and have not even been addressed in well-run public fora about the whole package and its individual components.
- 3 The TP receives little attention in this submission for the reasons touched on in 2 above
 - in particular, there were no public sessions offered in situ or online on the Draft TP, its major components (especially those of particular interest to a community accustomed to the previous one), its new workings and processes, and on the main areas of change compared to the current Plan
 - relying on placement of a large wad of TP documentation on a website as the only interface with the community for feedback purposes can easily be perceived as mean, penny pinching, and very out-of-touch with people's ability to explore and understand all that is presented and what hangs off 'driving' documentation such as the new Territory Plan
 - some also consider the current and recent consultation rounds as a quite contemptuous approach to engagement.
- 4 **Assembly Inquiry recommendation** status - while the District Strategy and Territory Plan documentation is out in the ether, there has been no attempt to advise about the coordination of government responses, nor the government's decision-making, regarding the 49 recommendations released by the Assembly Inquiry into the Draft Planning Bill on 22 December 2022
 - in view of the poor timing of these overlapping exercises, no further finalisation and implementation work on the reform package should occur until the final status and treatment of all Inquiry recommendations is clear, relevant amendments are made to the bill, and are advised and clarified for public information, and perhaps additional feedback opportunity too.
- 5 **Assembly Inquiry into District Strategies and Territory Plan inputs** - likewise any inquiry into the current draft District Strategies and Territory Plan, that may arise as a result of issues raised in the current public consultation round, should ensure that:
 - it is not rushed or demeaned by any push to have whole reform package finalised and implemented as soon as possible: as for 4 above, all decisions on recommendations and any amendments to the current tranche of documentation, plus education and public engagement on them need to be given priority, in the interests of greater government transparency
 - to help improve community understanding of the whole package and its impact as it moves to finalisation with amendments
 - use of case studies ('now' and 'future' scenarios for example) was recommended by the late 2022 Inquiry into the bill and would also greatly assist government and authorities' interaction with the

public from now on (their use in the current consultation round would have helped enormously too). At what stages of the new planning processes will this occur, and how will such 'improvement' be notified? None of this is clear in the current documentation

- lack of clarity about these matters will not help to win over the hearts and minds of the public who expect to easily see and understand how the new system will turn around, rebalance, and greatly improve what is happening, especially since the Chief Planner too has expressed concern and frustration with the current system's apparent limitations and unwanted outcomes:

'The AC T's Chief Planner says the current territory plan forces the territory's planning authorities to approve unsuitable developments and gives developers a clear pathway'
(*Canberra Times* 26/2/21)

- this should be a clear turn-around foundation for the reform package, and the public now deserves to be advised simply and clearly how the planning authority will go about not approving developments that are not ideal.

6 Better understanding is needed of the revised rules, processes, and information provision (including EDP, DV, and DA presentation and documentation) that will underpin the realisation of the Chief Planner's expectation of:

'the best outcome for the site [and]... thinking about the site in the context of the street or the block or the suburbs' (*Canberra Times* 26/2/21)

- he also made it clear that simple compliance – eg a ticking of the boxes regime - has driven the development seen to date
- it is clear that for any new planning system to be workable for all, the public also deserves real, easily accessible and understood evidence of how the current processes, outcomes and scenarios will be avoided in the future – all before any finalisation of a future planning system.

I Trust, faith, credit, credibility needed now

1 The introductory comments above on a few of the many matters and perceptions arising in relation to the current consultation documentation do not bode well for engendering public trust and faith in the vast range of new planning operations that will be implemented under the new system, including for communities facing much reduced public consultation time frames, and an increased level of urban infill development.

2 Such matters need addressing in non-rushed, fully educative and transparent ways before any new system is finalised for implementation - or even some form of trialling occurs, which planners at a public forum (the one and only?) at the beginning of November in Woden, seemed to be suggesting would happen for six months or so this year.

3 Additionally ACT Government's management and 'selling' of a new 'outcomes'-based system has been poorly handled and supported to date

- it has been inadequate for understanding what lies ahead, ie what is intended, and what will be delivered, according to new standards, processes, checks and balances etc, about which currently too little is known
- many concerns and queries about 'outcomes' raised in public submissions on the draft bill do not appear to have been addressed satisfactorily in ways that would help guide actual delivery of better outcomes and assist comprehension of what lies ahead eg in the district strategy concept.

4 'Outcomes'- based planning is still poorly communicated as a new or revised concept, and this needs remedying too, including more specifically in the district strategies

- the concept/aim attracted much genuine comment, and many queries and concerns in public submissions on the draft bill: these deserve honest open and easily comprehended responses too
- again, a series of well-constructed case studies ('now' and 'future'- see Introduction above and 5 below) would surely assist this
- if the government is to commit to real improved 'outcomes', the broader public should be told clearly what it can expect to see, where, and when, at the macro and micro levels and which particular processes and decision-making will ensure this.

5 Honest and transparent case studies are needed to clearly illustrate how future planning and its 'outcomes' will deliver much improved assessments, standards, processes, and consultations and results compared to now, particularly at the district level

- there are plenty of examples in the local landscape that can be drawn up on that show what is wrong with the current system, eg its enabling of poor compliance, and much 'pushing the envelope' by developers, the use of poor materials and finishes, eg by Housing ACT, that weather after a short period of time, poor public realm outcomes, and insufficient attention paid to a raft of needed non-built form 'inclusions' in DV and DA documentation. The current piecemeal block by block approach delivers poor outcomes (IX and X below also refer)
- what will be prevented, avoided, and even penalised to ensure much better 'outcomes'? What new powers, held by whom, will enable this?
- what has been learned and taken on board in the new system from the many DV, DA and EDP submissions which make suggestions for improvements to the content and presentation of these major documents, the associated consultation processes, the documentations' accessibility and useability by the broader public? These matters are particularly pertinent to the investigation and management of Future Investigation Areas (FIAs) and their development at the suburban and district levels
- learnings would most likely also suggest the benefits of a more 'joined up planning' approach are needed and should be committed to as part of any district strategy finalisation and adoption eg across large renewal precincts within a district (see more on this at IX and X below).

6 Increasing public trust and faith in the new system's ability to deliver improved (yet to be in defined), outcomes must be a key and measurable priority for the ACT government from now on

- if this is not pursued, the whole new system may as well be put away on a shelf for the time being, until the broader community has been able to acquire far better familiarity with, understanding of, and the ability to engage with:
 - the Territory Plan, the detail involved, and including the amendments and flow-on impacts to District Strategies
 - District Strategy aims, objectives, and standards - across all district strategies; updates on strategies adopted post 'investigation' of FIAs in different districts
 - reporting of actual improvements and 'turn-arounds' that should be reported to the public on a regular basis, at a citywide level, by district, and within suburbs identified for FIA follow-up
 - government learnings from a) to c) above, and how roles, processes, and intentions will be changed for the better under the TP and the district strategies .

7 Lack of clarity and good cross-community comprehension of associated processes and timeframes devised to date to deliver ‘outcomes’ has frustrated the intentions of too many who would have made inputs beyond one-sentence comments or flag-marking on online district strategy ‘boards or maps (ie they would go well beyond, and provide a balance to, local council type service provision commentary)

- the only Q&A session held in the past four months was online with one hour for the whole of Canberra in late February – this highlighted well how and why some well-educated Canberrans were so frustrated at grappling with the layering and complexity of the content of the current tranche of online documentation: moreover some questions could not be answered adequately or sufficiently authoritatively by experts present - basic requests for some clarification (eg on pre-DA and consultation matters) were taken on notice, but so far advice has not been circulated
- II below suggests ways of improving the reforms’ communication and information processes from now on.

8 Much more transparency in planning, governance, and attendant processes is required to support 1-7 above. Current and past planning experiences, resultant imbalances (eg see X below), having to live with and be affected long term by less than optimal ‘outcomes’, and much delayed or no improvements to the public realm in significant renewal areas

- all these have drained the ACT Government of the credit it needs to bolster its promotion of any major reform program, but planning even more so, given planning's chequered history and results to date.

9 When government’s credit with the community is stretched, the overall credibility of the key proponents of this new system also founders and suffers

- perceptions of just bulldozing forward the finalisation of the new planning set-up into permanency according to rigidly held government timeframes is both risky and unfair, given the concerns that continue to be raised and appear to have been hardly addressed to date. ‘Bulldozing’ as carried out by the previous federal government was recognised by the public for what it was and why, and ACT residents are unlikely to be tolerant of such a practice in relation to major legal and other planning reforms that will be determining their liveability for years to come
 - a risk assessment of the way forward needs to be made public (see XIII, point 4 below).

II Provide more engagement and improve consultation considerably from now on, before new system implementation.

1 The November 2022 - February 2023 broad public ‘engagement’ processes were inadequate for the job in hand and for what lies ahead.

2 Again, the government relied primarily on dumping masses of ever more complex information on websites, which also does not augur well for the future: many cannot easily access or work with only online major policy and discussion documents, and the same applies to EDP, DV, and DA documentation (see also III point 2 below)

- inadequate notification was given for ‘pop-up’ and workshop opportunities for the inner north, in particular in early November: timings also clashed with major planning submission deadlines for this ‘district’, and little notice was given for opportunities in early December, let alone any broad advertising done across relevant communities and in the media

- overall, ‘pop-ups’ provided marginal opportunities for input and no solid opportunity to dive even slightly more deeply into the Strategy or the Territory Plan
- four days’ notice was given for an inner north suburb-located ‘pop-up’ in February, and no community advertising or use of posters, etc accompanied the line-up of new and too few opportunities (eg ‘pop-ups’, listening centres) despite concerns being raised about poor awareness and timing back in November
- similarly a Canberra-wide Q&A session was added in online for the end of February. (See I, point 7 above), and should be improved upon for future sessions.

3 III below includes suggestions about improved communication and basic information provision, including through Access Canberra centres and public libraries

- encouraging broad and ongoing engagement with the reform package and detailed attention to the proposed treatment of FIAs marked within large areas of existing suburbs (like Downer), requires a far bigger and fairer communications effort than experienced to date.

III Improve current information provisions and clarification, and future relevant package communication processes

1 I and II above raise numerous concerns about the ACT Government's organisation, handling and sharing processes used for airing this final part of the reform package

- the package, its content, and its future daily application across the whole of Canberra demands far more proactive support for community engagement from now on, rather than just relying on dropping masses of more complex documentation onto government websites

2 This current reform consultation approach unfortunately just follows on how EDP, DV, and DA consultation processes are presented and handled in minimalistic ways: their similar deficiencies have been raised formally for years and also need serious attention and remediation to ensure that future community engagement at a district level is realisable and fairly managed, especially across a district like the inner north which spans more and more renewal infill densification, with much, much more to come on a fairly constant basis for many, many years.

3 Lack of readily accessible non-online material and other learning approaches

- the current information and communication deficits experienced and outlined above relate directly to the paucity of easy, accessible information and public fora for learning and clarification purposes
- the current consultation period’s approach came across as scrappy, done on the run, with too little support for those who wished to learn more and comment beyond flag-marking on maps or on a ‘board’ on a website
- far too little hard copy material was available anywhere for public use during November-February consultation period
 - the paucity of hardcopy material for public reference has also been raised time and time again in relation to the major EDP, DV and DA documentation put out for consultation in major inner north renewal areas (eg along the Gateway and within adjoining suburbs which now include large areas of new FIAs)
- the A4 summary ‘at a glance’ documents were rationed severely at a main inner north suburban ‘pop-up’ in February because of inadequate supplies

- such material, including copies of full district strategy documents, was not available as multiple copies in public libraries and Access Canberra centres or advertised as being available for perusal and use in any easily accessible places
- none of this was helped by the usual ACT planning approach of releasing major final or draft documentation for consultation over the Christmas-New Year annual summer break 2022-2023
- this should be avoided in future, ie in December 2023 or January 2024 no one will want to provide feedback on the first few months of reform implementation
- in addition, summary printed documentation deliberately left out references to key community assets needed in fast growing population/renewal areas (eg upgrade or replacement of the Civic pool complex - see also VI point 2 below); public queries about FIA issues were answered by very broad 'set pieces' about more being known and consulted about at later times:
 - both these matters came across in discussions with experts (eg at a listening centre and in the online Q&A session) as being 'off the table' for now
- inadequate notification for too few consultation 'pop-up' and 'listening centre' arrangements were still the norm in the last part of the current consultation round (eg four days' notice for a major suburban inner north 'pop-up'); searching around the bowels of a website for ad hoc updates on these highlighted insufficient notice and timing options too.

4 Learnings were also stymied in other ways: inadequately resourcing and access to experts, and government decisions about not entering into particular 'conversations', except in very broad set-piece ways, frustrated participation in the current round of engagement opportunities

- in December a polite formal request for attendance in early February of an expert planner at an inner north suburban meeting of interested residents was rebuffed, despite the suburb being peppered with many 'Future Investigation Areas' on the new planning maps - surely experts could still have delivered a much needed educative session on the District Plan and its links to TP components such as zoning
- 'pop-ups' were poorly resourced - questions could not be answered, the focus was just on collecting odd views/thoughts for writing down on a postcard, sometimes accompanied by suggesting answers that were then duly written down: lack of adequate supplies of summary hard copy material at 'pop-ups' and there being none in adjacent libraries did not help either
- 'learning centre' opportunities should have been preceded by public fora exercises in broad information provision and on specific topics relating to the TP and District Strategy context/changes versus the current system
- more experts should be on hand at future 'learning centre' type consultation offerings.

5 The ACT Government, and its planning authorities, must respond in more comprehensive and better resourced ways now to meet the community's need for much improved and more transparent information communication and processes (including notification and time frames). This, and the suggestions made in 1-4 above require

- evidence of budgeting for sufficient skilled resources on an ongoing basis to ensure a comprehensive quality job occurs on all this reform engagement at the community level (ie over and above and sometimes instead of the less than adequate and often conflicted 'consultation' undertaken by developers and their consultants.

6 Budgeting for the new system must also support an improved and ongoing information access and equity program for the inner north and all other districts. For example, in future:

- all public libraries should hold full sets of the final planning reform documentation (the act, TP and all district strategies) for in-library use plus a set available for short term loan
- all consultation documentation created between now and finalisation of the reform package components should also be provided in public libraries and ACT Access centres
- any future Assembly Inquiry on the reform package or its components should be supported by placement of full sets of relevant (eg draft) documents in public libraries and ACT Access centres
- adequate and timely advertising of the availability of these reference materials should also occur (eg via the CBR newsletter, media advertising, timely advice to local community associations and councils, and via 'alert' posters in libraries and ACT Access centres

7 If new permanent information and communication support cannot be provided at district level, the finalisation and implementation of the raft or planning reforms will be badly compromised - further eroding already low levels of faith and trust held by a fairly aware and educated community about the aims and objectives of this whole reform project

- the long-term costs of doing this project on the cheap from now on will far outweigh the investment of providing improved processes now.

IV General comment on the Draft Inner North and City District Planning Strategy (INDS)

1 The INDS documentation comes across as 'thin' - too aspirational, with over-egged claims compared to what is known or seen and, in parts, it is inaccurate.

2 It seems designed to enable almost anything to occur in the future, without real commitment to matters that concern inner north residents and which have been communicated formally and informally over many years, including by many formal 'sub' district and neighbourhood planning exercises.

3 General comments follow at 4 below on the draft inner north strategy, drawing on both the A4 summary and the 156 page versions

- relatively few comments are provided compared to the number of thoughts and queries that these two documents trigger: but time and space constraints prevail
- the comments provided are therefore a selection only of what I would like to raise.

4 General comment about amending the INDS

- the 'city' part of the current strategy should become another separate, stand-alone strategy - but with links to all other district strategies, particularly the inner north and inner south ones
- given the major population increases expected north of the lake, a more sophisticated and expert approach to addressing both the 'city' and its links to the 'inner north' design development is also needed, ie at a higher level than a district document, given the broader population movements, interactions, and interdependencies affecting these areas
- the strategy should also include real vision and commitments to a raft of broad physical, social, cultural, and green space improvements across all inner north suburbs and should be updatable
 - much is made of 'city' projects in the drafts, but the few projects highlighted for the other inner north area are already under construction or in the pipeline or have been deferred for completion for some years

- the use of ‘mays’ and ‘mights’ does not engender confidence in actual delivery of very much needed ‘outcomes’ especially those that the community has suggested in the past
- the 156 page Strategy needs to be easily usable and navigable by the public as a key reference source (in conjunction with the Territory Plan - which also needs to be made easily understandable and understood by the broader public)
- the Strategy should include a comprehensive index at the back, plus incorporate cross referencing to other sections (and footnotes) within the text, and refer to relevant parts of the Territory Plan as guidance too
- a summary list of maps/figures, their names and page numbers should also be included
- given their ‘busyness’, the Strategy’s district maps should be much larger (ie a full A4 size in hard copy), clearer, and checked for accuracy and ambiguities (eg Figure 39, page 115, does not provide sufficient clarity about the already planned for Gateway developments on the Northbourne Avenue edge of western Downer
- A4 sized maps for each inner north suburb should also be included to assist perception of detailed markings within the suburbs
- the valued characteristics of each suburb, as identified through past major suburban or neighbourhood consultations, and accepted by previous ACT governments, should be revisited and included in the Strategy
 - they have not necessarily disappeared, and they should not just be ignored because a new strategy is now to be used for development and provision of facilities purposes
 - local community surveys in recent years have highlighted what is still valued, and what should be retained and enhanced
 - the poor notification, limited nature and content of the Inner North District Strategy workshop held in July 2021 meant it picked up on values across the whole area at quite a superficial level only and this is reflected in the current document
- all strategies should also make very clear the standards, quality, aims, and objectives that all districts share and deserve to share concerning improved physical and social amenity for communities across Canberra.

5 Some additional ‘ad-hoc’ comments on parts of three District Strategy documents also follow below at V, VI, and VII:

- V: Comment on the summary ‘At a Glance District Strategies - Focus Areas of Change’
- VI: Comment on the summary ‘Draft Inner North and City District planning Strategy’
- VII: Comment on the full ‘Draft District Strategy - Inner North and City’ (INDS)

V Some comment on the summary ‘At a Glance District Strategies - Focus Areas of Change’

1 The last page, ‘Focus Areas of Change’, encapsulates the issues arising and topics for which far more advice and information and case studies (‘now’ versus the ‘future’) are required

- eg, saying ‘we seek your feedback on these areas’ (re the ‘proposed possible and potential’ change areas), with ‘the long term focus’, suggests that specific supplementary information/consultations are needed on these at district level **before** any reform package is finalised
 - this is also the case on the ‘future investigation areas’ and ‘shop to centre connection areas’ mentioned on that page: how will all these areas will be treated with much improved planning approaches (eg via ‘joined-up’ precinct review needs and impact assessments planning)? See also IX and X below.

- including in relation to areas already mooted for considerable densification, such as on both sides of Northbourne Ave between the Antill/Mouat Streets, Dickson intersection and Flemington Road in Mitchell and up to Randwick Road
- this plea applies particularly to Downer, given its targeting to date for infill and now new FIAs.

2 What is the real value all community efforts and inputs on all these new listed planning concepts and directions and their expected application across districts and within suburbs?

- to date very little formal feedback from the community seems to have ever been taken on board by the ACT planning authorities and the developers since the focus on built forms (as many as possible) has become the priority and the norm; public facilities and upgrade investments lag far behind or, usually, are not acknowledged, let alone planned for long term – this is particularly evident in many parts of the inner north already
 - how will this change radically for the better?
 - common objectives, standards, and quality provision are required across districts so that some equity is evident too
 - the district strategy model should not become a ‘divide and conquer’ mechanism in suburbs with (volunteer) respondents more able to commit to ongoing, detailed, engagements and with skills that assist community participation over long periods of time, such areas may benefit far more from improved ‘outcomes’ than others because they are better able to understand and influence planning decision making.

VI Some comment on the summary ‘Draft Inner North and City District Planning Strategy’

1 Improved provision of the district map (page 3) is required – larger, clearer, plus detailed suburb-by-suburb maps would help

- further comment on reasons for the need for these are at IV point 4 above
- the marked out Downer ‘Rapid stop to Group Centre 400 metre connections’ is inaccurate: the length of the path to the (‘Rapid’) light rail stop at Swinden Street is 800 metres along Swinden Street alone (so says the sign), it is even further to the central Downer area that is marked
 - if walking to the Swinden Street rail stop (ie up to 800m) to get to the Dickson shops area in the Dickson Group Centre arrival at the Dickson Interchange rail stop then requires a 400-500m walk or a bus trip
- these markings on the maps currently lack a lot of meaning or detail
- getting to the Dickson Group Centre for many other Downer residents would be greatly assisted by a much improved local bus service whose frequency and number of services at different times of the week-day/night and weekends have been reduced constantly since the lead up to light rail starting four years ago
- those in central and north-east Downer (and at the Academy of Interactive Entertainment, Watson) can’t even access outbound Rapid 9 buses (to the Dickson Interchange rail stop or to Belconnen) easily because there is no stop between the Watson shops and halfway down southern Phillip Avenue
 - light rail and broken journeys have led to much increased car use for many Downer residents
 - unfortunately the district map makes a mockery of more equitable access (another Rapid bus stop the western end of Windeyer Street, Watson is needed)

- the district map’s prime focus on the light rail route and a commuter Rapid bus route to Belconnen highlights the already existing imbalance in servicing the rest of Downer and the physical, social, and other costs now borne by residents as a result
 - the final District Strategy should commit to remedying this.
- 2 Include the Civic pool complex in the 3rd dot point on p.1 in this summary strategy document - it too is a highly valued facility by users all across Canberra
- it should not be deliberately left out here just because it is the subject of a separate exercise or similar (as advised at a ‘listening centre’ event); it deserves recognition as a necessity for a steadily growing population
 - it needs to continue to exist in either upgraded or replacement form in the city centre.
- 3 Last page (5 sections)
- remove references to ‘City’ matters, as suggested at IV point 4 above, and include more dot points for inner north suburbs; refer also to the retention of vistas of natural surrounding landforms from key points such as the Dickson Group Centre, – the Northbourne Avenue-Antill/Mouat Street intersection Dickson, and along Northbourne Avenue - these heritage and bush capital-linked forms should be better recognised and protected in inner north planning, especially since the district houses the ‘Gateway’ to the national capital
 - innovation precincts: highlight the opportunity for the Watson one to link to potential new smaller scale facilities in Downer too, particularly education, research, and cultural endeavours
 - the reference to future development of EPIC should be qualified to recognise that large events should be appropriate for a rapidly growing population area (noise levels refer), and the ability of public transport to adequately service such events (see also XII below)
 - major ‘joined-up’ planning approaches are required to support the ‘Sustainable Neighbourhoods’ (see X and IX below), particularly where thousands of new residents are expected to live in infill precincts bordering existing suburbs on an already overcrowded rail route (see also XII below)
 - proven and measurable methods of urban heating mitigation should be committed to as integral parts of any investigation and planning exercises across the inner north and within suburbs impacted by Gateway urban renewal and FIAs (see also XI below)
 - provision of more ‘diverse’ ‘sustainable’, as well as more public, social, ‘affordable’ and build-to-rent housing complexes in the inner north should pause until improved standards, quality of design and materials are determined and committed to as part of the basic planning and approval processes
 - too many recently built public housing complexes in and around Dickson are already showing physical deterioration and evidence of inadequate design and functional inclusions, and follow-up maintenance
 - far better outcomes would instil a greater sense of pride in those able to access these housing opportunities and would ensure better and more accepted integration into the changing suburban landscape
 - for the ACT government to engender trust in the way forward on the ‘outcomes’ planning system, it first needs to show how it will operate as a model developer too: see <https://citynews.com.au/2023/housing-act-loses-another-griffith-da/>.

VII Some comment on the full ‘Draft District Strategy - Inner North and City’ (INDS)

- 1 This document definitely needs rewriting to include a comprehensive index and cross-referencing - finding references to specific changes and direction without these across a 156 page document is very

frustrating and time consuming (see also IV point 4 above). Ditto locating maps and figures (see also IV point 4 above on this).

2 Rewrite the strategy as two parts: one for the City/City Centre and one for inner north suburbs, with links between the two

- the claims in paragraphs 2-5 in the summary ‘wrap up’ on page 7 and directions on page 8 all sound more CBD/City – centric: more balanced foci for inner north suburbs would have to be more evident in a separate strategy
- comments above at IV point 4 above also refers to the benefits of having two separate strategies.

3 The community use facilities and ‘innovative’ models for facilities driver (page 8 right-hand side) - this ‘direction’ deserves additional dot points to acknowledge the need for catch-up facilities provision, and upgrading or replacement of the few existing ones (eg Majura Centre, Dickson), in view of not just ‘expected population growth’ but as a response to growth that has already occurred to a great degree within the inner north suburbs already (ABS data refers).

4 Strategic movement to support city growth driver (pages 8, 51) - include an additional dot point on page 8 to highlight a driver concerning the Dickson Interchange and its need for further development (eg, basic facilities provision, greening, increased comfort levels), and improved servicing coordination particularly in relation to outward-bound broken transport journeys back into the adjacent suburbs

- also add specific areas of action deserving of commitments on page 51 to better meet needs and encourage more public transport use (especially by local bus services) across the inner north suburbs
- VI point 1 above refers to a specific action area – ie consider at least one additional bus stop for the Rapid 9 service before it reaches Northbourne Avenue.

5 Establish new innovation precincts (pages 9, 97, and elsewhere): a broader perspective on the Watson Academy of Interactive Entertainment - Australian Catholic University innovation corridor would bring small pockets of new employment to a larger adjoining area , eg in Downer, including along Antill Street and Phillip Avenue Downer

- much employment and mobility into Downer was lost with the closure of major schools decades ago (Watson High; Downer Demonstration Primary - 1200 students at its peak), the central Downer shops area once supported a good variety of outlets (chemist, post office, doctor, supermarket, and restaurants over the years), bringing more workers into the suburbs and adjoining areas would help revitalise Downer ‘central’ and attract a variety of new businesses that seek to thrive, engage with and service local populations
- see also VI point 3 above on this.

6 Mixed use development - this has mainly been a handy catch cry for too long to justify high rise development by including spaces at ground level for ‘mixed use’

- the results of this in many parts of the inner north has been underwhelming and off putting (some complexes in Braddon and elsewhere have been underused or empty for years: others in the inner north experience a lot of turnover – their size, design and frontages often do not help)
 - yet others (Northbourne Avenue, Braddon, Dickson) are occupied by businesses that offer little interest or use to a resident with discretionary income – they act to ‘fill up’ a space
 - where medical services locate in such developments access is difficult and parking is short-term
 - numerous eateries/takeaway establishments tend to proliferate and then focus on servicing large office building environments only (eg in Dickson)

- quality opportunities for 'dining ' (page 95) are subsequently lost - most mixed use spaces are unsuitable for this
- incentives are needed to design more usable, attractive mixed-use spaces.

7 Large Centre renewal development and Group redesign, (eg Dickson, page 95) should include space for substantial, appealing, and comfortable outdoor dining options which more residents are now looking for and not finding (so they need to go outside their districts, usually by car)

- the post-Covid environment (page 24) makes no mention of the social and socialising impacts of Covid and what needs to be delivered - the focus in the text is only on employment patterns and use of the home for work purposes
 - precincts across the inner north (existing and future) are ripe for modernisation through provision of spacious, attractive, and cool-in-summer outdoor eating, dining areas and R&R spaces for use day and night, and not just for fast food/cafe food purchases
- incentives for businesses should be considered to help upgrade dining options in the Dickson Group Centre (page 95) particularly given its proximity to the Gateway boulevard to the national capital (page 95); planning for such a long corridor should be prioritising, showcasing and appealing to visitors too
 - there is little evidence anywhere that it ever will.

8 Population increases and impacts- Strategy amendment and further explanations to the public are needed, in view of significant changes in population growth estimates that were reported in February 2023 (eg in the *Canberra Times* and ABC articles) not only for the inner north, but also the two main adjoining urban regions to the north and west of it (current data references refer eg on pages 16,19)

- the Strategy should discuss and reassess impacts on physical and social needs and timeframes for increased provision of non-residential and non-built forms and facilities especially across the inner north
- particular attention must be paid to community expectations (page 27), eg support needs of all age groups in the provision of community spaces; review , improve and assist access to them.

9 Targeted, yet 'joined-up' interventions (page 9) are needed across the whole Dickson Group Centre, sooner rather than later

- the document must aim for and advise far more than the very aspirational statement about 'Dickson - a thriving urban centre' (page 95): to date its pathway to a 'greater mix of uses' has been underwhelming and focused on the utilitarian, and 'expanding its fine grain elements' is not what is noticeable currently across much of the Dickson Group Centre
 - masses of feedback over recent years and ongoing consultation with the local community has identified the 'shots in the arm' that the Centre desperately needs. Recognition of this current status and real commitment to well-coordinated quality improvements is needed in this Strategy
 - given the comment above, and also at 7 and 8 eight above, it beggars belief that on Figure 34 (page 99) the Dickson Group Centre is not marked as a 'Possible Centre Revitalization Opportunity'!
 - this should be rectified, especially since no other centre anywhere in the fast growing inner north is suggested for any future 'revitalisation' (although some is needed).

10 Maps/figures in the strategy

- the maps need to be made bigger (eg page 10) and clearer (eg the detail at suburban level on figure 39, page 115)
 - IV point 4 above also refers to the need and reasons such for such improvements
- figure 39 (page 115) also includes an 'Urban Core' element in the far north part of Downer: more detail is needed in this document on this new inclusion and reasons for its existence
- likewise, far more clarity is needed about the 'Urban Centre' inclusion shown on the western side of Downer and into more suburban streets - it is unclear if the western ones are the renewal developments indicated in the 2018 City and Gateway Strategy, or additional 'parallel' ones further into the suburb
- IV point 4 above also suggests the Strategy needs large suburb-by suburb-maps especially for suburbs like Downer which contain a plethora of already planned, expected, and potential redevelopments.

11 Civic and Dickson pools are briefly mentioned on page 117

- comment about acknowledging the Civic Pool complex (its value, role, need for upgrading or replacement in the CBD) is at VI, point 6 above
- the growing inner north and city populations also require access to more all year-round pool facilities and a local hydrotherapy centre
 - Section 72 Dickson, adjacent to the Dickson Group Centre would be a very appropriate site for additional community, recreational facilities with adjoining parkland
- the Strategy should include stronger commitment to the future provision of such facilities and spaces, and to the continued upgrading, and good management of existing swimming places in the inner north.

12 Quality outdoor spaces – the Strategy chooses to highlight that 'a higher density environment' requires consideration of 'the need for quality children's outdoor play spaces' (last sentence page 117)

- the Strategy should acknowledge the need to provide quality outdoor spaces and parks for use by all ages, eg cooling and comfortable spaces to retreat to easily, especially in hot summer months and close to conveniently located new or expanded community use meeting and socialising and recreation spaces, suitable also for adult short course provision, U3A classes and the like, during the day and night
- the Dickson Group Centre area currently offers no such spaces, facilities, and opportunities
 - space in adjacent Section 72 should be used to develop a real community recreation hub with usable, flexible outdoor spaces for new and existing residents and others from across Canberra who would be attracted to activities at such a hub
 - Section 72 should also host additional cultural opportunities (learning, exhibition, residency)
 - there is no 'New Community and Recreational Facilities' marker shown for the inner north between Watson (where a playground already planned for), and the ongoing Haig Park facilities redevelopment, in figure 40, (page 119)
- for the reasons above, the Strategy should commit to, and show future community recreation facilities on public land in Section 72, Dickson.

13 Developing the local bus network (page 53) - this is well overdue and the Strategy should include stronger commitment to it: the local community is sick of worsening services over the recent years while rates increase because of the (non) proximity of many to the light rail

- VI point 1 above discusses some inner north bus network issues, deficiencies, and needs (eg an extra stop to assist north-east Downer residents access the more frequent outbound Rapid 9 service to the Dickson Interchange and Belconnen)
- XII below discusses the need for much improved assessment and analysis of public transport use and capacity as an integral part of the planning for the densification of many parts of the inner north district
 - o the Strategy should commit to this; it needs to be a key part of all research, investigation consultation, and final development proposal documentation given the 'Urban Centre', 'Urban Core', and FIA development areas marked on figure 39.

14 Active Travel (page 53) - the statements about the Active Travel Plan are not only mainly aspirational but are also misleading

- the final Strategy should note the Plan's status: currently it is still in draft form and finalisation is expected in the second quarter of 2023 (consultation closed in August 2022)
- the Strategy should acknowledge the many 'holes' in the 'active travel' options presented to the public to date: moving to active travel requires modernised footpaths, with good summer shading, lighting, convenient bike paths, improved crossings, and timings, and improved public transport connectivity – (especially local bus services) across the whole week, day and night
- much government effort has been put into 'micro mobility' (page 53 – scooters?) while infrastructure and support for the majority of the population continues to languish
- all factors required to support safe and appealing active travel by all age groups should be highlighted on page 53.

15 'Established policy framework' for the strategy (page 13)

- the listing of key documents informing the strategy does not include the 2018 City and Gateway Urban Design Framework (a main influence on densification in the inner north!), the Urban Forest Strategy or the Living Infrastructure Plan: Cooling the City
 - o they certainly might have been among other documents 'considered' (page 52) in the formulation of this district strategy, but their direct relevance to the inner north and its future liveability should make their inclusion and description mandatory in this part of this strategy document.

VIII National Capital Design Review Panel (NCDRP) – issues relating to district planning

1 The ACT Government's continuing firm stand on the NCDRP being insulated from the planning reform process does not bode well for suburban areas marked out for actual and potential densification over the coming years

- there is certainly a need for a far better oversight and influence regime for the design and siting of built forms, particularly major ones, on 'infill' blocks and the NCDRP is the only body available to assume this role currently.

2 ACT Government responses to the many comments and suggestions made about the NCDRP in the planning bill consultation exercise were simply 'noted' or 'not agreed'

- o this position suggests considerable stubbornness by government about ever improving the role, responsibilities, and resourcing of the NCDRP: it is 'off limits' because the government believes its role and processes 'remain fit for purpose and are performing as intended' (2022 Bill Policy

Overview, pages 29 to 30) yet no evidence was provided to support this conclusion or show how design of vast areas of urban infill across the inner north district will improve under the new planning system, and who will ensure this.

3 The district planning concept deserves better backup particularly in areas like the inner north that are slated for considerable densification

- all elements of the NCDRP objectives, processes and options for improvement deserve a comprehensive independent and publicly accessible review and assessment in view of local experience of significant urban infill and renewal activities in recent years in the middle of an inner north suburb
 - o a major complex of four large 4-storey buildings on a relatively small block did not require NCDRP review because the built forms were below 5-storeys: unfortunately the developer, unlike others in the inner north, refused to voluntarily offer up the plans for NCDRP consideration and comment
- there was, and still is, no requirement for the NCDRP to consider such a large project - yet if the block had contained only one building of five-storeys, surrounded side by extensive landscaping and tree groves, the panel would have had to review it.

4 District strategy objectives and processes should be bolstered by NCDRP review of complexes, and collections of complexes under five storeys

- plus, all multi-storeyed planning in and next to existing suburban settings needs to focus more on the interface with surrounding areas, eg including visual impacts, building mass, and loss of substantial mature trees, and the need for on-site broader heat mitigation responses
- the current focus by ACT planners, developers, the approval processes, and the current NCDRP focus is far too skewed towards built forms – settings, higher quality landscaping, and the public realm require equal and timely attention too.

IX More 'joined-up' planning needed at the local level

1 The Territory Plan and the district strategy concept need to provide clear evidence of real commitment to better 'joined-up' planning, especially at the front-end of development planning, DV, and DA processes and for public realm improvements

- 'outcomes' at the end of the planning processes will only improve if the inputs at the beginning are attended to in a comprehensive, and even mandatory, way in addition to encouraging innovation etc via the now advised 'flexible' approaches.

2 Joined -up' planning at the front end can avert years of community frustration, confusion, and considerable time wasting arising from having to raise such basic concerns about concept plans, DAs, et al and suggesting how such planning situations should be handled better, now and into the future.

3 'Joined up' planning is needed not just at this very local micro level but at the macro level , eg along the inner north rail corridor and within adjoining suburbs.

4 'Joined up' planning at the local level (Section , block)

- the inner north strategy needs to convince those who, eg, live in or near nominated urban intensification areas, that planning in the future would be far more well-coordinated and timely, eg across a particular area like a Section, and ensure that their experiences - like the following recent

ones in an inner north suburb - would be a thing of the past (see VII above for an example). Such experiences have included:

- having both developers and government authorities not accepting the need for a well-developed and detailed heritage tree removal and replacement plan
 - thus leaving a major tree corridor along key suburban streets looking worse than moth-eaten due to uncoordinated removal and replanting over years, which is resulting in uneven growth patterns that will persist for decades - an outcome still not assisted by the continuing lack of any overall tree management plan
 - the delays causing physical and visual amenity loss due to such a hotchpotch approach to urban densification 'renewal' stages of this large section in the middle of an established suburb
 - the lack of consideration of new and long-term urban heat creation impacts from the full renewal on that Section
 - the build-up of considerable community distrust and disappointment about how the Section's renewal has been handled, and continues to be handled, by planning bodies for too many years.
- unfortunately the bill's consultation report merely 'noted' community calls for EDPs to include tree management plans and human impact studies (page 30 of the report)
- in view of local experiences described above, will the final planning reform package do more than 'note' such planning information and monitoring improvements?
 - the district strategies should formally pick up on and recognise much more of what the community inputted to the planning consultation on the draft bill and to the Assembly inquiry on the bill.

5 This micro/local level planning within a district also requires improved information about broader district planning contexts as part of the implementation of any district planning (see X below).

X District planning requires sharing 'big picture' information, analyses, and updating

1 'Big picture' information and data must also be part of the district level 'joined up' planning and be enabled by government to assist understanding and assessment of development options and proposals

- the district strategies need to incorporate a clear commitment to this.

2 Much community concern and frustration continues to arise from the fact that there is no simultaneous planning and commitment by government for the concurrent provision in and around existing major renewal locations in the inner north of:

- new and upgraded infrastructure (even at the basic level), and other public facilities (eg schools, community use facilities)
- more shared green spaces, parkland, and community-use facilities
- significant increases in the urban forest across wider areas, to help counteract the increased urban heating created by a large 'suburban sized' renewal project like Kamberra (2,000 + new dwellings) which is located near to the 10-year multi-stage Yowani project (800 + dwellings and other built forms), and the expected thousands more residents at the major racecourse redevelopment.

3 Such matters have been raised again and again by many in EDP, DV, and DA consultation processes, in other inputs, and at workshops etc, with little positive outcome; the development locations just focus on profit making built forms and little else

- ie only multi-storeyed residences, childcare centres, hotels (accommodation), and current some commercial office space in enclave-style developments proliferate – plans for the northern Gateway area particularly refer.

4 This piecemeal and inward looking approach (ie by each individual development project), along the Gateway corridor, for example, reinforces a growing impression that major development proposals in this area emerge on a ‘fait accompli’ basis, provided that they ‘tick the boxes’ linked to the 2018 City and Gateway Strategy, and can argue that more passengers will be poured onto Stage 1 Light Rail:

- eg a recent DV documentation package frequently justifies 2000 ‘dwellings’, and other large built forms, on a northern Gateway location, on the basis of light rail accessibility –

“Patronage of the light rail by Kamberra residents will contribute positively to the financial viability of the Light Rail development of Canberra is consistent with the requirements of the business case for Light Rail” (DV383 November 2022)

- yet such proposals rarely consider (or are currently required to consider), the impacts on the rest of the Gateway population or surrounding suburbs especially from public transport supply-and-demand perspectives (see also XII below).

5 Currently such matters are too often dealt with in DAs in a promotional way that is more suited to potential purchasers than to those in the surrounding areas needing solid information which is not currently available from relevant government bodies either

- unfortunately the current district strategy draft is big on promotion but not clear on commitments to improving on what currently happens.

6 What district planning needs:

- in relation to all ‘map marked’ urban renewal intensification areas, no rezonings for primarily residential development should be considered until a far more information is available to support the integrated review and assessment of the uses, needs, options, inputs and public interest impacts, relating to large areas of land and surrounding areas
 - this would be required prior to any DV process and be made public for consultation - not only in relation to a string of major development sites (eg in the area from Mouat Street Lyneham, up Northbourne Avenue to Flemington Road and on to Randwick Road, Mitchell), which are in close proximity to each other but also adjacent to existing suburbs (which are also growing and now have more areas nominated for urban renewal)
- a more holistic, encompassing approach would enable all involved in development and consultation processes to far better consider and appreciate possible different options for land use and (hopefully) influence (for the better) all the outcomes that will result not just for individual projects like Kamberra, for example, but for the collective ‘whole’ along and adjacent to a large development area like the Gateway in the inner north
 - with outcomes encompassing far more than the current built forms and mainly residential focus for all these current and future projects
- such improved, substantive and updatable, broader scale contextual ‘input’ information is required at the early and ‘front end’ of the district development decision making process where reuse of urban land is suggested or required, and would also require and enable subsequent individual projects in the area to consider and address their interface with the broader assessments and the impacts arising from their proposed land re-use

- better information leading to better outcomes would also help counterbalance the 10-15 or even 20 years of major disruptions accompanying such major changes.

7 Adoption of comprehensive ‘joined up’ ‘front end’ only planning approaches at the local/district and inter-district levels would also require far greater focus and deep dives on:

- urban heating impacts and mitigation (see XI below)
- public transport capacity and supply (see XII below)
 - this greater focus on ‘front end’ planning and review would help bring local communities ‘along the journey’ in far more transparent, educative, and productive ways than they have experienced to date.

8 Currently the largely promotional approach used to convey the district strategy concept weakens the strength or credibility it needs to really turn around approaches to, and ‘outcomes’ for, more localised planning

- a serious commitment to well researched and organised front-end and joined-up precinct planning would improve perceptions of how our district and suburban landscapes will alter over the next 5, 10, 20 years.

XI Urban heating, treeing, and district planning

1 Page 87 of the draft Inner North and City District Strategy appears to downplay community interest in, and concerns about current and future urban heating trends and impacts:

‘Most of the district is relatively cool in hot weather, however there are small urban heat hotspots such as Russell and northern parts of Lyneham’

2 Urban heating is part of the ‘big picture’ for development projects (especially large ones comprising mainly densely situated residential and other built forms and little else), which must be assessed at the ‘front end’ of the planning process for their heat contributions, impacts, and mitigation responses, including in relation to surrounding suburban areas

- addressing this form of heating should also be accompanied by additional specific climate change mitigation measures at an area’s ‘big picture’ assessment level, and at the micro level (IX and X above refer)
 - this would also bring more balance into the urban renewal and densification equation, and improve practical actions that would be incorporated very early on into DVs and DAs and DVs, and so improve liveability over the longer term for all.

3 Implementation of the Gateway urban densification is currently a major contributor to inner north urban heating, with much more to come along the full corridor and in adjacent inner north suburbs

- much more should have been learned and has been experienced about the urgency of mitigating climate change since the Framework was released four years ago, also about how growing urban environments and large building masses (such as planned for the Yowani and Kamberra precinct) also contribute significantly to urban heating and poor public health outcomes.

4 Complexes’ physical and visual impacts on broader community surroundings require more attention, particularly mitigation of urban heat creation and trapping associated with building mass and the introduction of swathes of hard heat-trapping horizontal surrounds

- recent NCDR Panel advice on plans for a major multi-storeyed commercial complex opposite Downer referred to the need to pay more attention to the broader community impacts and improvements
 - o however adding a few planters on the building's balcony terrace and roof is not a sufficient response to the complex's urban heat creation, but the developer seemed to think that this was adequate.

5 There is little in the district strategy to suggest that much has been learned from planning the Gateway so far, or from community comments on concerns about it.

6 For major inner north precinct and Gateway development in future, the Strategy should commit to

- intensive landscaping plans that intensify perimeter tree frontage in keeping with the tree coverage and corridors that the ACT government seeks to protect, nurture, and expand via its
 - o Gateway Framework minimum requirements (particularly north of Antill Street) and – ideally - these should be exceeded where possible
 - o Urban Forest Strategy
 - o Climate Change Strategy
 - o Canberra's Living Infrastructure Plan: Cooling the City
- at least a double row of large canopy trees all along the Northbourne Avenue frontage, not just parts of it, to be provided in a timely fashion (eg concurrent planting as soon as development starts, with matching plantings on the opposite side to prevent a moth-eaten look along the Gateway)
 - o the essential and important treeing of the Gateway north of the Antill/Mouat Streets junction is designated as an 'informal park boulevard (Framework, page 22) - the height and bulk of buildings planned for this part of the Gateway certainly require at least two rows of large trees for cooling, screening, and softening purposes: the Strategy should prioritise Gateway landscaping and vegetation rectification
 - o more timely tree cover plantings are also needed along new district street upgrades and extensions (eg the new Swinden Street 'west').

7 The current tarnished and decrepit look and scant greening of much of the developing Gateway, despite being still promoted as a national boulevard, does little to convince the surrounding community that the ACT's planning focus is concerned much about anything that is not a built form that can be crammed into available spaces, and that years of delay on providing quality public landscaping and visual improvement are an acceptable planning norm.

8 Inner north district planning should also ensure that design of replacement or upgraded major suburban pathways, eg through a suburb or to a rail stop, and that run east-west, are provided with tree plantings on the northern side of the pathway to help counteract harsh heat impacts and encourage active travel.

9 Other forms of urban heating mitigation need to be identified, quantified, and required as part of all inner north district densification and renewal planning

- residents across the inner north will expect the ACT Government and developers to show that they are 'on the front foot' in responding agilely and comprehensively to 'Cooling the City', improving visual and physical amenity across the district and particularly along the Gateway corridor for visitors arriving by car to the national capital, as well as improving the long-term comfort for current and future residents and all active travellers in and around this location
- if the planning 'buck is stopping' at the district level now, much more needs to be committed to in the district strategy to address urban heating in consistent and measurable ways. They must go beyond some additional tree planting and planters that seek to partly camouflage swathes of new horizontal and vertical hard 'built' surfaces and provide a bit of shade for on-site users.

XII Inner north district planning – address public transport supply, demand, and assessment.

1 Public transport supply and demand are other key ‘big picture’ information elements that deserve greater priority and attention in the district strategy, given major planning indicated for many ‘infill’ urban renewal projects in the future

- it is not enough to accept blithely made statements in DVs and DAs for example that:

‘Public transport via the nearest [Dickson] bus interchange and light rail stations is excellent’

(particularly in this instance where the multi-storeyed renewal project was located in the centre of a suburb and on a bus route with a worse bus service than five years ago)

- or treat light rail as a ‘milch cow’ justification for major residential development where light rail, with its limitations, is the only form of public transport available
- comment below raises public transport and planning and assessment issues which the whole package and the district strategy need to reassure the community about, since much of the new planning system will deal with development on, and next to, a major public transport corridor for many years to come.

2 Current district level development documentation does not provide data and analysis of future outlooks and scenarios which would illustrate what many other infrastructure users (living near to major residential projects, and further afield) can expect in terms of convenience, travel efficiencies, access to new and improved community facilities, new parkland, and other needed commercial outlets including easily accessible restaurants (most can’t scoot to these locations either)

- such ‘big picture’ overview planning and data crunching on public transport should aim to improve choices and quality of life in rapidly densifying environments.

3 Public transport demand and supply must be an integral part of, and receive more prominence, in the whole package and in the district strategy in far more ‘joined up’, ‘big picture’ ways

- to better assist planning development and assessments of development needs and options and their workability in particular locations
- why ?- because public transport, particularly light rail, appears to be a formative backbone and a key driver of the new planning system and what it seeks to achieve, in the inner north.

4 Yet the enthusiasm for focusing on the light rail planning lever or driver tends to ignore ‘on the ground’ matters and experiences which, to date, have received little attention at the ‘front end’ of the planning system

- ‘cramming on board’ light rail, for example, is not acceptable, not comfortable, or physically appealing to sectors of our community, nor is it a healthy travel environment for anyone in ongoing Covid times. The inner north district strategy must recognise this.

5 Currently, proposals for DVs and DAs produce lengthy travel and traffic assessments that rarely address the current travel realities and future outlooks; documentation focuses on the likely movement and means of mobility for people associated with an individual project ie new residents, workers et al

- planning support documentation does not provide data on future outlooks and scenarios that are able to identify and avoid possible adverse impacts on existing and future public transport users

living in surrounding areas, and also those who need to move through a major renewal location (eg the kilometres long Gateway corridor) to reach a destination elsewhere.

6 Factors like maintaining, if not improving, travel access, efficiency, and convenience for surrounding residents must be honestly and openly assessed and advised , particularly for those living 'downstream' of very major developments like the 'infill' complexes at the northern end of the Gateway and further developments north in the Gungahlin district.

7 Clear, honest, 'front end', up-to-date, and publicly available evidence is needed, for 'big picture' and 'joined up' planning information and assessment, on how public transport will meet increased demands over time - particularly on the major inner north rail corridor which the new planning system is focusing on

- existing and growing populations in these areas, and those from elsewhere, who need to travel to or from those areas, should not be left to wonder if their travel experiences will worsen for years to come as many thousands more are encouraged to live along and around the Stage 1 rail corridor, both inside and outside the inner north.

XIII Conclusion: beefing up inner district planning and the strategy; risk assessment needed

1 Before the district strategy and the rest of the package are amended and notifications made about changes and implementation prepared for and advised, the whole package and this district strategy in particular require more expert and honest inputs from bodies like TCCS and environmental authorities so that the community is certain to receive improved 'upfront' analysis and information. It should then feel better informed about the future outlook and impacts likely to be experienced from significant urban densification proposed in the strategy, and be better prepared to engage in the subsequent processes.

2 Upfront, honest, transparent and, as required, 'joined-up' planning information would greatly help restore faith and trust in any ACT planning system and the ways which it, and the government responsible for it, can better protect and enhance physical, visual, and social amenity across Canberra in more equitable and balanced ways

- ie at higher and more committed levels than what the district strategy appears to focus on and suggest currently.

3 Inner north communities still require much public education about, and subsequent understanding of, the Territory Plan and the inner north strategy. These must respond clearly to these everyday, yet 'quality of life' impacting, concerns, eg about the capacity of light rail to respond quickly to demand from major infill development projects without creating negative (including off-putting) consequences for downstream users, both current and future (XII above refers)

- this also requires ministerial and organisational acknowledgement that such consequences already exist now
 - o strong legislative backing and government commitment is needed to ensure that more action occurs, not just at the beginning of planning processes, but also as solutions – all this should be done in understandable and practical ways to meet identified needs, as part of the new planning system's implementation at the district level.

4 Risk assessment needed - given that the ACT government is set on implementing the whole reform package by mid-year, what risk assessment has been done to identify various levels of risk, especially foreseeable ones, concerning new planning system operations and workability – both inside and outside the

planning directorate

- these regular and higher level risks and associated time-frames should be made public along with the mitigating action required.

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3 March 2023

DRAFT TERRITORY PLAN AND INNER SOUTH DISTRICT STRATEGY

DRAFT TERRITORY PLAN – too complex

- The Government's stated purpose for the planning reform is: "To deliver a planning system that is clear, easy to use and that facilitates the realisation of long-term aspirations for the growth and development of Canberra while maintaining its valued character". The draft Territory Plan and supporting documents **do not meet the stated purpose** of a clear and easy to use planning system.
- The map of possible/probable changes is at best confusing and in fact unreadable. What's being hidden here?
- The Inner South Canberra Community Council's "Inner South Canberra District Planning Strategy - Future Directions for our District - 2021" is a thorough, locally-sensitive, attempt at a District Strategy. This should be drawn on more comprehensively in revising the Government District Strategy for the Inner South.
- The strategy for the region between Yarralumla and Deakin (along Adelaide Ave) is just not acceptable. It's clearly driven by the developer lobby to cash in on a new tram line to Woden. That tram line has been shown to be economically irrational, and it will take twice as long as a bus (even the present buses) to travel City to Woden. Electric buses, small-medium-large offer much more flexibility and don't require the billion-dollar infrastructure of a FIXED tram line.

3 March 2023

[REDACTED]
[REDACTED]
[REDACTED]

The ACT's New Planning Framework including the draft Planning Bill, the draft Territory Plan, the District Strategies (especially the Inner South District Strategy), District specifications, Technical specifications and the "Explanations of intended Effects for: ACT Urban Design Guide ACT Housing Effects"

1. This submission is made because the New Planning Framework (the Framework) is flawed. This can be attributed to the process followed in its creation. My main concerns relate to risk, governance and accountability because the Framework gives discretionary power under outcomes-based decision making to the new Planning Authority.

2. I have read the government documents and attended workshops. I contributed to two, and read, other submissions. I refer to those of the GNCA, the ISCCC, the YRA, the DRA, CPAG and Richard Johnston. I support those submissions and make six recommendations:

1. Do proper law reform including making the comparative studies available and doing more consultation
2. Apply the DAF best practice model and explain reasons for deviations from it
3. Provide more accountability if discretions are to be introduced
4. Engage a planning lawyer from outside the ACT with "fresh eyes" to reorganise and restructure the documents, refine the definitions, and align the provisions. Importantly, ensure that the documents being used for discretionary decision making are clear and subject to change only with monitoring by elected representatives.
5. Undertake a risk assessment
6. Change the Inner South District Strategy to properly reflect heritage

Recommendation 1: Proper law reform

3. The Framework has gone awry by producing a solution before consulting properly. Two examples explain this. First, the Australian Law Reform Commission's model of law reform shows that major legislative change is best done by explaining the issue, getting expert advice and building consensus by consulting widely. Secondly, the Australian Policy Cycle, first published by Bridgman and Davis,¹ illustrates the sequence of steps that should be followed. This Framework has missed important steps.

4. The Australian Law Reform Commission, since its inception has followed a successful model of consultation, instituted by The Hon Justice Michael Kirby AC CMG. It often uses Issues Papers, Discussion Papers and a final Report with recommendations, frequently containing draft legislation. It now also uses online methods extensively.² Another government approach is the use of a green paper to set out a proposal for discussion and a white paper to set out the complex issue and propose the solution.

¹ Bridgman and Davis *Australian Policy Cycle* first published 1998 now see Catherine Althaus et al *The Australian Policy Handbook: a practical guide to the policy making process* Routledge 2022

² <https://www.alrc.gov.au/publication/first-submission-to-the-inquiry-into-the-australian-law-reform-commission/3-approach-to-inquiries/consultation/>

5. The Australian Policy Cycle shown below can be joined anywhere. For example, our relatively successful planning regime operating in the ACT for some years could have been evaluated, then issues identified and so on. If the government was frustrated by the system's ability to meet the challenges faced it could have consulted with **all** stakeholders. Canberra is fortunate to have educated, engaged, and experienced residents with many skills who would have responded to discussion papers and consultations. Instead, it appears that the government has listened its department and only some stakeholders then produced its preferred result without getting more people on board.



6. Why is this happening? What is the pressure causing steps to be ignored? Are there predispositions? Is this ideologically driven? Is one demographic group being deliberately favoured over another? Obviously professional planners were involved. But in developing the policy were the views of professionals from other disciplines, including lawyers, sociologists and heritage experts, taken into account? What was the impact on COVID on this process?

Make the comparative studies available

7. The ACT government combines the role of State government and local council so the planning laws must do the job that state and local government planning laws do in other places. For example, a resident of Newcastle, a city with fewer people than Canberra, has the benefit of NSW Planning law and Newcastle City Council laws.³ Also ACT land is leased so, in fact, the government owns land. There is some leasehold land in Queensland and elsewhere in Australia, but this is a legal difference that should be recognised in planning documents and explained.

8. The Supporting Report for the New Territory Plan says (p.20):

³ See NSW Government Planning portal: <https://www.planning.nsw.gov.au/About-Us/Our-Work/NSW-Planning-Portal> and also the City of Newcastle Development site: <https://newcastle.nsw.gov.au/development>

a. *Other planning systems that have been reviewed recently, such as South Australia and New South Wales, were also considered. This review work has shown that the planning challenges identified in the ACT are also common in other planning systems.*

b. *The review of specific planning matters such as development provisions, definitions and zoning allowances has involved a review of similar matters in other planning systems. Due to the number and nature of changes being proposed by this Project, these jurisdictions are not individually listed. However, due to the similarities across the nation in planning governance systems, most of these jurisdictions are Australian local councils.*

9. So the laws that councils use elsewhere in Australia have been included in the Territory laws. Has there been an analysis of the difference between council and state provisions and the checks and balances between the two – and how that is to be managed in our unicameral jurisdiction? Layers of jurisdiction provide checks and balances that we don't have. The Queensland Crime and Corruption Commission submission on the Queensland bill stated⁴:

The desire to enhance flexibility to adapt processes to unique circumstances must not undermine the ability to achieve consistent and predictable outcomes. The desire to achieve efficiencies in the process must not remove the obligation to have effective checks and balances or lower standards of accountability.

Do more consultation

10. It is not too late to recover from where we are in the policy cycle. The government's documents, draft bill, supporting documents and other material could be treated as exposure drafts. The comments on them could be gathered. Short discussion documents could be produced exposing the issues, the concerns and the government's response and possible ways forward.

11. Commitment to consultation is best practice in law reform.⁵ And there has been extensive consultation but it is the wrong kind because the proposals are too far along and there has not been enough time for, or considered discussion of, the proposed changes. There have been 2500 pages to digest over the holiday season and briefing sessions that haven't really explained the substance of the changes. There is a commonality of concerns among many commentators that should be addressed before this reform proceeds.

12. The main reason this should occur is that it is dangerous in a civil society to foment discord, as these documents have done. There was a low level of trust to begin with and this has made it worse.

⁴ Jennifer Roughan Performance Based Planning in Queensland 2016 p.13
<https://www.planning.org.au/documents/item/7429>

⁵ B Opeskin, 'Measuring Success' in B Opeskin and D Weisbrot (eds), *The Promise of Law Reform* (2005), 202.

13. Other reasons are that more consultation will improve the legislation, facilitate acceptance of the need for some change and hopefully resolve some of the divisions that have arisen in the community (see discussion of the policy cycle above).

14. As this consultation was conducted without actual discussion papers, but rather outcome documents, the next steps will be important. The submissions will show that there are several main “sticking points.” These could be extracted and further consultation on them could occur through discussion papers and/or explanations. The documents that are currently missing could be included in this consultation.

Recommendation 2: Apply the DAF best practice model and explain reasons for deviations from it

15. In 2005 the Development Assessment forum (DAF) produced *A Leading Practice Model for Development Assessment in Australia*. It has ten steps that are very sensible. It is a toolkit designed to be adapted so each Australian jurisdiction can adapt it to suit their particular needs. I have read Richard Johnston’s application of this model to the existing ACT system and the proposed model. I recommend that the next round of consultation include this model and explain how and why the Framework deviates from it.⁶

Recommendation 3: Provide more accountability if discretions are being introduced

16. The decision to introduce discretions through outcomes-based decision making is a major change not adequately explained in the explanatory documents. More transparency is needed about the balance between the rules and discretion. Discretion places trust in the ACT planners when the community, frankly, has little trust in them. There is no evidence of how they will be trained, monitored, or otherwise held accountable. Discretion and secrecy and money leads to corruption and this is not discussed. Nor are the steps to mitigate against corruption.

17. In creating legislation to govern behaviour, and to be applied by decision makers, there has been a long-standing trade-off between prescribing too many rules and giving too much discretion. This is not a simple binary equation – there are nuances and concessions to be considered and weighed.

18. There are several factors in favour of prescription. For example, legislation, including planning law, is increasingly complex⁷ and those applying it, and using it, need clear guidance in its application. Legal certainty comes from prescription.

19. In a recent matter before ACAT the party joined with us was an experienced Canberra builder and developer who has been applying the codes and rules to DAs he has

⁶ See Richard Johnston’s submission.

⁷ See e.g. Lisa Burton Crawford, Elma Akand, Steefan Contractor and Scott Sisson, ‘Legislative complexity: what is it, how do we measure it, and why does it matter?’ on AUSPUBLAW (23 November 2022) <<https://auspublaw.org/blog/2022/11/legislative-complexity-what-is-it-how-do-we-measure-it-and-why-does-it-matter>

been submitting since 1985. I have previous experience of rules in decision making⁸ but this time I gained another perspective on the value of rules in providing clarity and consistency. I saw them being used in a practical way by a professional in another field. I understand the frustration some feel when they are trying to achieve an outcome and are blocked by what they see as a pedantic requirement. But the rules provide a level playing field and guidance for everyone.

20. Of course, discretion allows more flexibility. Decision makers are guided by the law but trusted to exercise their judgement in applying the law. But there can be a diverse range of outcomes and a lack of consistency and certainty. The outcomes approach will inevitably lead to actual and perceived undue influence from certain parties which will likely lead to corruption, loss of confidence in government and institutions and poor outcomes for ordinary citizens.

21. There is no discussion in the supporting documents of the trends in planning law, including the role of property rights in influencing whether there should, or should not, be planning controls. Traditionally the English planning system has put more emphasis on discretion and flexibility while the European and US planning systems have valued certainty more highly.⁹ The Napoleonic legal tradition, followed by countries such as France and the Netherlands, is more rule based. Israel also has planning rules and policies in the regulatory tradition.¹⁰ This should be included in the comparative material that is made available. In particular, there should be an emphasis on how accountability is managed in jurisdictions that favour discretions.

22. There are at least ten steps that could be taken to improve governance and accountability:

- a. The Legislative Assembly could establish a committee that monitors planning approvals. In particular it should monitor and evaluate reports submitted under recommendations below; and
- b. Adopt the NSW and SA model of local planning panels that deal with contentious DAs. They have experts and mostly meet in public. This reduces disputation and increases transparency; and
- c. A Planning Commission could be established, as CPAG suggests, to create another check and balance on the conglomeration of policy and decision making in the Planning Authority; and
- d. Guidelines could be formulated on the exercise of discretion in determining whether a DA satisfies outcomes.¹¹ These could be used to train decision makers; and

⁸ For example, in migration law visa requirements are rule based - except for Ministerial discretion under the Migration Act. (There have been several inquiries about the exercise of that discretion).

⁹ 'Edwin Buitelaar and Niela Sorel 'Between the Rule of Law and the Quest for Control: Legal certainty in the Dutch planning system' (July 2010) Vol 27 No 1 *Land Use Policy* 983-989; Phillip Booth *Controlling Development: Certainty, Discretion and Accountability* (1996), Newman and Thorley *Urban Planning In Europe* Routledge (1996)

¹⁰ Nurit Alfasi 'Is Public Participation Making Urban Planning More Democratic? The Israeli Experience' (2003) Vol 4 *Planning theory and Practice* p.185-202

¹¹ E.g. WA Ombudsman Guidelines on the exercise of Discretion in Administrative decision making.

- e. A system of internal review of complaints about decisions on outcomes could be established. For example, a complainant who suffers material detriment from a decision based solely on outcomes should be able to seek internal review; and
- f. The *Annual Report* could record how many complaints were made and the number of complaints each decision maker received (without personally identifying the decision maker); and
- g. An annual quality assurance assessment of each decision maker could include review of complaints and numbers of DAs approved and rejected;¹² and
- h. The Planning Authority could be required to include the decisions of tribunal and courts in its control documents. That is, when a decision is handed down an agency has the options of appealing it, adopting it or changing the law. Ignoring it isn't one of the options¹³; and
- i. The government could give an undertaking that a review of the system of decision making based on outcomes will be undertaken after eighteen months of the operation of the new system; and
- j. There could be public consultation on what steps could be taken to improve trust in the ACT planning system.

Recommendation 4: Engage a planning lawyer from outside the ACT with “fresh eyes” to restructure the documents, refine the definitions and align the provisions.

24. The Framework would benefit from the “fresh eyes” of a detached lawyer from outside the ACT. This will be a cost but will reduce risk. The Framework has many parts, both statutory and non-statutory. Assessment material includes the District Specifications, Technical Specifications, the ACT Urban Design Code, and the ACT Housing Design Guide. Some of these are still missing. Some will be “called up” but the circumstances for that, and the role in the hierarchy, is unclear. The lawyer could be invited to consider the following issues, among those raised in other submissions.

23. More clarity and transparency are needed on the legal hierarchy of the elements of the Framework; the statutory and non-statutory nature of each element and why that status was chosen; which body has authority to amend each element; the appeal rights in relation to decisions; all definitions; all mandatory requirements for DAs; and several other legal issues.

24. Each element has issues. For example, proposed s.47(b) in the new Planning Bill requires the Territory Plan to give effect to the planning strategy and district strategies. This elevates them into key documents which is challenging given their nature. The procedure for their amendment is also a concern.

¹² Quality assurance of administrative decision making occurs in departments and tribunals in Australia and overseas. Details of such processes are readily available.

¹³ See the Royal Commission into the Robodebt Scheme that is inquiring into the practice of income averaging by Centrelink during the period 2015 to 2019. In March 2017 a member of the AAT, Professor Terry Carney decided that income averaging was unlawful. He made four more similar decisions. Evidence has emerged at the Royal Commission that all five decisions were ignored, and Centrelink continued their long standing practice until November 2019. Prof Carney was not reappointed to the AAT in September 2017.

25. Another example is the Technical Specifications which aren't part of the Territory Plan but can list a development to "fast track" it through without being properly assessed. The Technical Specifications can be amended by the new Planning Authority (details of which are unknown).
26. The definitions for everything are difficult to locate. There are definitions in the Supporting Report. Ideally there would be a single location for definitions governing all the applicable laws. Also clear guidance on how those definitions can be amended.
27. The project purpose includes maintaining the "valued character" of Canberra.¹⁴ The project objective includes growth while not compromising the "valued character".¹⁵ Valued character is not defined. It is also not included in the statement of the Territory Plan.¹⁶ Also that statement could say: "an attractive, safe and efficient environment in which to work, live and create consistent with its valued character." (Noting the need to replace the word "recreate" with "create").
28. The explanatory documents will inevitably be widely used in interpreting the new legislation. They could be more helpful. The provision in the Planning Bill to bring supporting material in to help readers understand and apply the Territory Plan is only helpful if its status is quite clear.
29. To re-iterate, if the outcomes-based approach is adopted despite the concerns outlined above, there are several problems including: the lack of supporting documentation for it; the lack of analysis of comparative experience; and the risk of corruption. This means steps should be taken to define it more clearly. The outcomes need more definition using verifiable evidence and objective measures of compliance.
30. Amendments to the assessment requirements should be monitored by elected representatives and not be at the whim of the Planning Authority acting on the advice of the decision makers. In particular, mandatory assessment requirements must be in the Territory Plan and supervised by elected representatives. (This includes Technical Specifications).

Recommendation 5: Undertake a risk assessment

32. The explanatory documents are more like public relations documents than policy documents so the risks of the proposed system and measures to mitigate the risks are not canvassed. It would be very useful to have a risk assessment.
33. For example, disagreements about planning decisions will continue despite changes to planning laws. What has the impact been in SA and elsewhere? What will be the cost to

¹⁴ Supporting Report New Territory Plan p. 8

¹⁵ Id

¹⁶ Supporting Report New Territory Plan p. 5

the revenue of bedding down the new system? What will be the cost of the corruption that will follow from discretionary decision making? What is the cost of measures to mitigate against it? Have the economic and social impacts been examined? Will there be a boom in development when rules are lifted? What will be productivity cost of the confusion caused by the new system? What is the cost of opposition to discretionary development?

34. One of the most significant costs may be the litigation costs. Tribunals make decisions on the merits, applying the facts to the law. Courts ensure that administrative decisions are made within the legal limits of the power. When discretions are applied, courts still inquire into a range of issues including whether the decision makers asked the right question, took irrelevant considerations into account, or adopted an illogical approach. Litigation may take a different direction, take longer and cost more but it will still exist. Is there advice on what this impact to be?¹⁷

Recommendation 6: Change the Inner South District Strategy to properly reflect heritage

36. The Inner South District Strategy that will be given effect to in the Territory Plan is flawed in its approach and not designed for the intended use. It essentially disregards the heritage of the Inner South which is one of its most important characteristics. In particular:

- There is insufficient regard to heritage in the drivers, targets, and implementation pathways.
- The reference to heritage in the Blue Green Network is tokenistic.
- Cultural heritage values are not defined.
- The Heritage Act is not listed although other important ACT legislation and policies are included.
- There is an emphasis on heritage sites rather than the heritage character and streetscape of the Inner South.
- The Inner South District Planning Strategy, with its focus on the importance of built and natural heritage, is largely ignored.

37. We can do better than this. Let's keep consulting on it with open minds.



3 March 2023

¹⁷ For example, in migration law discretion were replaced with prescription in 1989. In 2001 a privative clause was introduced in the *Migration Act 1958* to limit judicial review, and this led to extensive litigation on jurisdictional error.

¹⁸ BA, LLB, LLM, formerly a specialist in quality assurance of administrative decisions.

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.

Inner South District Strategy

The maintenance of an inner south garden suburb environment in the context of future climate change is an important outcome for residents in any future plans for the inner south community. The documents provided for consultation have not revealed evidence of cities which have had success in using quantitative measures in outcomes based planning. The planning strategy for the Inner South does not provide any measures to be used to reflect success in outcomes based planning. Independent review of planning decisions by legislative, community and administrative bodies is critical in any future outcomes planning.

I moved to Forrest in 2004 because of its garden suburb characteristics, quiet tree-lined streets and central location. I appreciate its history with a considerable number of heritage-listed precincts and buildings. These built and natural features of the suburb must be preserved for future generations. They are central to the story of Canberra's growth as the national capital. As a resident, I believe there must be compulsory standards to protect the amenity of existing and future residents in the context of climate change. Vague outcomes that are reliant on planners' interpretations are not enough. These standards should cover access to sunlight/natural light, privacy, maintaining a high ratio of green planting on residential blocks, restrictions on building height and protection of the character of heritage precincts.

I am particularly concerned about the limited focus on heritage properties in the Inner South District Strategy. One of the defining features of the Inner South and especially Forrest is the number of heritage properties particularly those on the radial roads such as Hobart and Melbourne Avenues giving credence to the garden suburbs image. Yet acknowledgement of this feature is missing from the Strategy.

The Strategy should make it clear that any DAs on heritage must be sent to the Heritage Council for recommendations. Also the Heritage Unit and Historic/Mature Tree Management area should be separate from the Chief Planner and the Planning Department and able to give independent advice.

Similarly the Inner South District Strategy should state that the removal of significant or older or protected trees in the Inner South should automatically be referred to the Conservator and be included as part of compulsory assessment of any DA. .

Forrest residents want a say on neighbouring knockdown rebuilds as it is reducing the built and natural heritage of Forrest particularly Hobart and Melbourne Avenues with the latter under piecemeal redevelopment on the Deakin side with no heritage requirement. Cross streets such as Empire and National are now major thoroughfares for commuters. Long term protection of mature trees, significant green spaces in building lots and green parks will contribute to a cooler city and help meet the government's climate goals.

Currently the Inner South District Strategy does not protect Forrest's broader heritage built environment including the specific heritage precincts, as well as individual buildings such as the maternity hospital, streetscapes, street furniture, etc). Nor does the Strategy allocate a priority to these early houses for Canberra whose residents significantly supported and influenced the greening of the built environment and streetscape of Forrest as a suburb and the wider development of Canberra.

COMMENTS ON NEW ACT PLANNING FRAMEWORK AND INNER SOUTH DISTRICT STRATEGY

I am a resident of Yarralumla, was born in Canberra in 1960 and have lived in Canberra most of my life. For the past 30 years, I have lived in Yarralumla

I object to the Draft Inner South District Strategy for Yarralumla and surrounding suburbs. It does not reflect the community views, it completely changes the existing character of existing suburb. It creates a new “community centre” on Adelaide Ave based on the claim that Adelaide Ave is currently not pedestrian friendly and gives no reasons why Adelaide Ave should become pedestrian friendly.

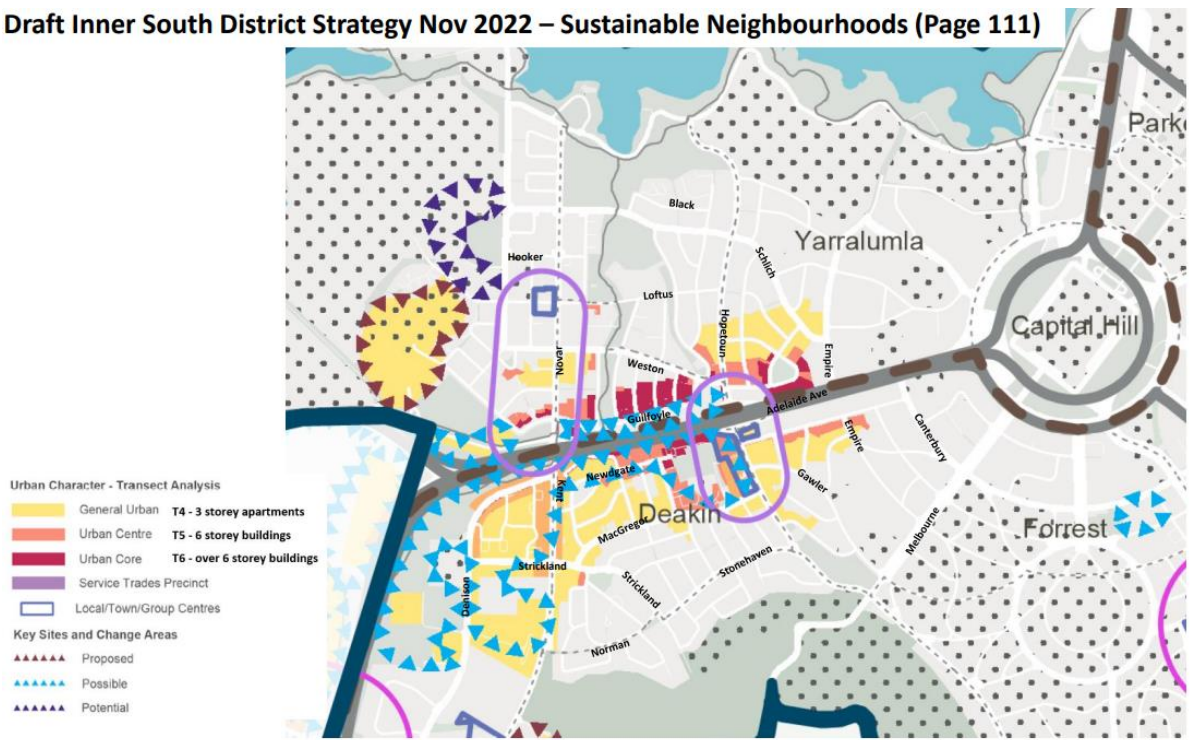
The Planning Bill 2022 requires that the Territory Plan give effect to strategic planning outcomes “s47 The territory plan— (b) must give effect to the planning strategy and district strategies”.

The draft Inner South District Strategy is superficial, generic, loaded with unnecessary motherhood statements. It fails in the stated outcome of “Draft district strategies capture the special character of and aspirations for each Canberra district as told to us during previous consultation.”

The plans seem to be devised by people who have never been to Yarralumla or Deakin.

The draft Inner South District Strategy, on page 111, shows large areas of Yarralumla & Deakin being zoned for 4 to 8 storey buildings. This zoning includes the Prime Ministers Lodge and numerous Embassies. It shows the West Deakin area as 4 to 6 storey apartments.

Draft Inner South District Strategy Nov 2022 – Sustainable Neighbourhoods (Page 111)

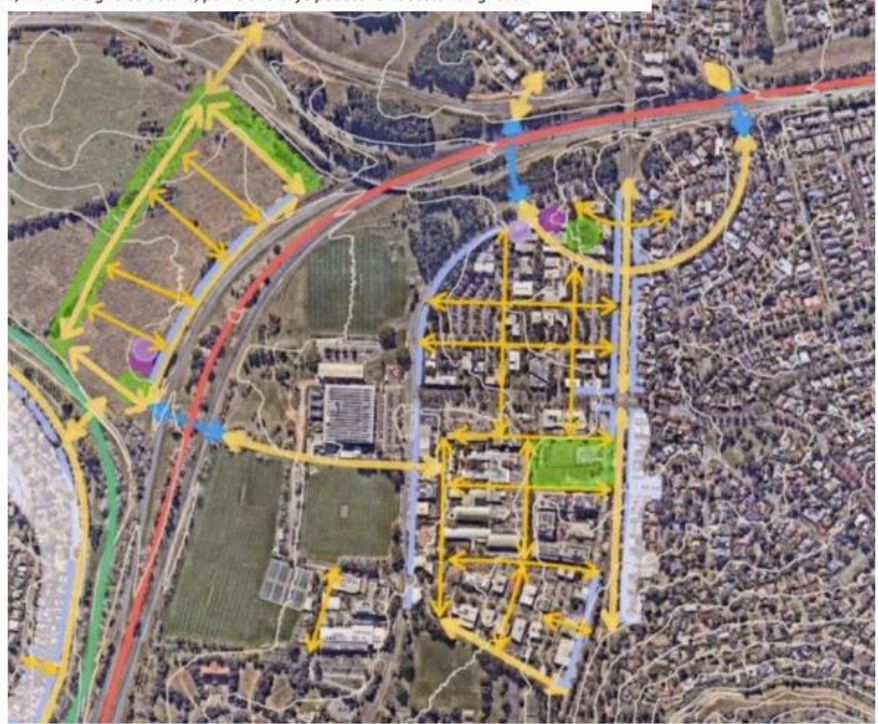


Several pages later, the plan for West Deakin is on page 120. Is “West Deakin will be a high employment hub, walkable grid structure, parks and safe pedestrian access to light rail.” The plan replaces all existing roads, demolishes the Equinox complex which is turned into a “Local park which

respond to topography, add canopy trees and WSUD". Strickland Crescent is to be removed and a new "Grid" road network is to be built including a road the through middle of John James Hospital.

Draft Inner South District Strategy Nov 2022 – West Deakin (Page 120)

"West Deakin will be a high employment hub, walkable grid structure, parks and safe pedestrian access to light rail."



These plans are only a few pages apart in the draft Inner South District Strategy but show completely different "outcomes" for Yarralumla and Deakin.

One can only assume the ACT Gov has plans for compulsory purchase of many of the existing building. This is especially true in West Deakin as the plan requires completely new road network and replace the Equinox complex with a "Local park".

That once the Planning Bill is passes into law, ACT Gov has must give effect to these district strategies. Based on the Draft Inner South District Strategy, the ACT Gov will need to do large scale compulsory purchases to *"give effect to the district strategies"*.

The plans shown in the Draft the Inner South District Strategy are inconsistent. The transect analysis appears arbitrary, and diagrams in the draft Inner South District Strategy appear to have been hastily thrown together, are inconsistent and conflated.

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

The online materials and advice provided by the ACT Government for the public consultation process is often in conflict with the various elements themselves and can be misleading and misinterpreted. The consultation on the New Planning Framework was scheduled to over the School Holiday and Christmas New Year holiday period 2022-23, thereby severely limiting the opportunity for community input.

I strongly oppose the Inner South District Strategy proposal for extensive high density, high rise densification of Yarralumla and Deakin.

The Strategy would result in infill of green spaces in order to provide an outdated fixed infrastructure public transport system.

It is environmentally unsound and would create urban ugliness. It ignores the unique quality of Canberra that sets it apart from state capital cities, which are commercially driven.

I am appalled by the size of the proposed buildings. Up to 60% of Yarralumla and Deakin could become three to six storey apartment blocks, destroying the current quality and heritage value of these two suburbs. The effect of such building would be to “close in” the neighbourhood, similar to that of Northbourne Ave.

I am also concerned at the loss of tree canopy, which is an inevitable outcome of infill, urbanisation and light rail.

There has been an alarming lack of transparency in the Strategy, lack of adequate publicity about the process resulting in insufficient community consultation. Why has this process been hurried through during the peak holiday season?

Submission from a group of Kambah residents in response to the call for feedback on the Tuggeranong district strategy

A group of 19 Kambah residents gathered on Saturday 18 Feb to have a 'kitchen table conversation' about the future of Kambah. This group was brought together during the exhibition 'Kambah' at Tuggeranong Arts Centre by Kambah resident and artist Louise Curham.

During our conversation, we identified what we prize about Kambah and what we would be upset about if lost or changed.

Notes from the conversation can be consulted here

(<https://kambahpeoplesmap.tumblr.com/post/710590858879238144/notes-from-kitchen-table-conversation-kambah>).

Our response to the Draft District Strategy:

We are concerned about /object to the many future investigation areas in Kambah (marked in yellow). The transect development concept seems to point to greater density in the transect areas, which we are concerned would lead to higher density options such as the multi-story dwellings in Chapman near the shops or intensification of single level dwellings. We believe these would negatively affect the character of the suburb. We are also concerned about/object to the potential intensification in Tuggeranong, already a large town centre - of about 4500/five new suburbs. This would have significant impacts for infrastructure, including roads, which are already stretched.

Some priorities for people from Kambah:

- maintain the distinct character of Kambah as a fully planned 1970s Canberra suburb, a character prized by residents
- keep our shade cover from large trees which means keeping the bulk of block sizes big enough to allow tree cover
- prioritise protecting the river corridor
- keep our diverse community mix of public housing mixed with private dwellings
- keep our green cul-de-sacs and local parks
- pay attention to the bushfire profiles already published that highlight the high bushfire ratings to the west, including across the river corridor
- look after our local assets like the woolshed and old homestead precinct
- look after our local shops
- any development should take into account the high quality 1970s and 1980s architecture interspersed through Kambah
- avoid the mistakes of the Jenke Cct approach - a development/commercial area that is out of character for the rest of the suburb

I don't support the draft new Territory Plan and draft district strategies

The proposed changes will lead to a judgement or qualitative approach rather than a quantitative approach. Decisions will be made by the government's assessors. The basis of the decisions will lack clarity and not be transparent. This will be the outcome even if the decision-making body is well resourced with trained and experienced planners and is well regarded by the community.

I have been involved in resident's groups for several decades. It is my experience that the assessment unit is not adequately staffed and it appears to rely on the development's neighbours to properly review the Development Applications. Residents do not have confidence in the planning assessments. There is also a strong feeling in the community that the views of developers and their professional lobbyists carry weight than those of the affected community. The proposed legislation will lead to poor outcomes that cannot be questioned or appealed. This is bad law.

I also object to the new Planning documents describing some areas (including our home) being described as "Future Investigation Areas". It is not good enough for a plan that has been years in the making. If decisions have not been made on these areas, they should not have their zoning changed from their current equivalent.