

3 March 2023

Environment, Planning and Development Directorate

Email: EPSDDcomms@act.gov.au

Dear Sir/Madam

PIAACT Submission – New Draft Territory Plan

The Planning Institute of Australia (PIA) is the national association representing professional town planners throughout Australia. The Institute has a total membership of about 5,500 people. The ACT Division of the Planning Institute of Australia (PIA ACT) is led by a committee of members who voluntarily help advance the planning profession in the ACT.

PIA ACT welcomes the opportunity to provide comments on this critical aspect of the current planning system reform. PIA ACT supports the current planning reform process and is keen to continue to be involved in the finalisation of all elements associated with the planning reform. We acknowledge the primary purpose of the Territory Plan is to provide the principle mechanism to achieve an outcomes-focussed planning system and stress that successful implementation of the new draft Territory Plan is a key component in the careers of many PIA ACT members.

The effective implementation of the new system will require a substantial shift in the way development is assessed and increased training and resources will be required to ensure a smooth transition and efficient assessment timeframes. PIA ACT is happy to assist wherever possible in this process.

Please note that we have decided to lodge two separate submissions:

1. This submission relating only to the new draft Territory Plan, and
2. A separate, more comprehensive submission on the District Strategies.

We consider that the new draft Territory Plan could benefit from inclusion of an over-arching vision statement setting the context for future development within the Territory. We note that each District Policy and Zone Policy have initial desired Policy Outcomes and then a series of Assessment Outcomes. However, the over-arching vision could be drawn from the vision

in the *2018 Planning Strategy* to emphasise how the development assessment process will manage growth and change across the city while achieving a *compact, efficient, diverse, sustainable, resilient, liveable and accessible* city through high-quality development outcomes.

In addition, the *Planning Principles and Strategic Links* should include details on how, or if, an application for development needs to address these principles. This section could offer more explanation as to how there is a clear 'line-of-sight' from planning strategies to statutory planning (Territory Plan).

In addition to the above, we provide the following comments for your consideration:

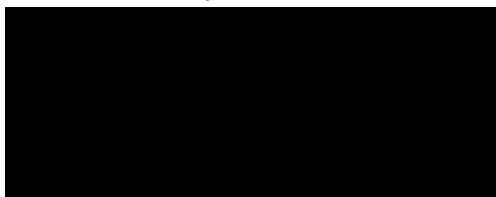
- The new draft Territory Plan is missing an ideal opportunity to address the current housing difficulties. The Plan should include specific provisions to implement a designed and spatial planning outcome to address improved housing diversity, such as the 'missing middle'.
- The link between the Plan itself and supporting documents such as Design Guides is too tenuous and needs to be strengthened to give the Planning Authority capacity to refuse developments that do not meet quality design expectations. The draft seems to enable simple compliance with baseline technical specifications as being the principle factor in securing a development approval, an issue that has affected the current planning system.
- The desired Policy Outcomes are mostly future strategic directions, while they should strongly align with the District Strategy, they should be written in a manner that development proposals can respond to in a statutory planning approach.
- The Technical Specifications should include a separate section on climate resilience, not just be part of the Environment & Heritage section.
- Information Sessions are required to provide explanations on how to navigate the new draft Territory Plan as there are concerns that the array of documents has not simplified the system, but have made it increasingly complex.
- Industry Sessions would also be useful to outline what documentation is expected of applicants to demonstrate achievement of desired outcomes.

- It is not clear whether Technical Specifications are actually part of the new draft Territory Plan or are '*Supporting Material external to the Territory Plan*'.
- There are potential challenges in applying the Technical Specifications to demonstrate achievement of the desired outcomes because there is no cross referencing that identifies which Technical Specifications relate to which outcome.
- The new draft Territory Plan has not included any detailed provisions for districts outside the urban area.
- The new draft Territory Plan does not include all areas where Special requirements under NCP apply, as the overlay has been removed. For example, the Inner South and East Canberra District Policy do not reference the National Capital Plan or areas where special requirements apply.
- Assessment Outcomes relating to Northbourne Avenue and Inner North should be merged with relevant suburb Assessment Outcomes for ease of use. These are the only provisions that aren't suburb-based.
- Height limits in Assessment Requirements do not allow for likely increased floor-ceiling requirements that we understand will be included in the Housing Design Guide nor do they facilitate minor additions like lift over-runs, roof-top plant etc

Thank you for the opportunity to provide input on the new draft Territory Plan. You may note from the above that PIA members are concerned about a range of matters particularly relating to implementation of the Plan. We would appreciate the opportunity for PIA members to directly workshop these matters with representatives of the EPSDD.

We would also be happy to meet with EPSDD officers to clarify any of the points or suggestions that we have raised.

Yours sincerely



PRESIDENT, PIA ACT DIVISION

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Email: EPSDDcomms@act.gov.au

Dear Sir/Madam

PIA ACT Submission – Draft District Strategies

The Planning Institute of Australia (PIA) is the national association representing professional town planners throughout Australia. The Institute has a total membership of about 5,500 people. The ACT Division of the Planning Institute of Australia (PIA ACT) is led by a committee of members who voluntarily help advance the planning profession in the ACT.

PIA ACT welcomes the opportunity to provide comments on the District Strategies. PIA ACT supports the current planning reform process with the introduction of District level strategic planning that we anticipate will establish a stronger 'line-of-sight' between strategic planning and statutory planning in the ACT.

Please note that we have decided to lodge two separate submissions:

1. This submission relating only to the draft District Strategies, and
2. A separate submission on the new draft Territory Plan.

We appreciate the opportunity PIA members have had to participate in the preparation of the Draft District Strategies through our involvement in the Technical Advisory Group, as well as the various opportunities members have had to attend Information Sessions, including the Industry Specific sessions.

Although this submission is primarily a compilation of inputs by PIA ACT Committee members, we canvassed the wider PIA membership during the public exhibition period of the Draft Strategies and have incorporated comments received from members.

Our submission, outlined in the following pages, covers the nine Districts individually, with over-arching commentary as the introduction. The submission incorporates the range of matters raised by our members and attempts to distil the main issues into "Key Messages" while retaining the reasoning behind our arguments, with more detailed explanations on each District.

By necessity, the submission is quite comprehensive and we would be happy to meet with EPSDD officers to discuss and/or clarify any of the points or suggestions that we have raised.

Yours sincerely



PRESIDENT, PIA ACT DIVISION

Introduction

District plans are an important contribution to more localised planning in the ACT. Managing urban growth that is sustainable – environmentally, socially and economically. Canberra as a city in a landscape has many great attributes for both its residents and the environment.

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.

While each of the Districts of Canberra are somewhat different and may contain different geographical features and constraints each district is not dissimilar in its requirements to have access to key services, a variety of housing typologies, open spaces and community facilities to provide sustainable places to live, work and recreate.

As Canberra grows into its hinterland it also critical that an appropriate balance is achieved between urban, rural and open space. Major considerations including climate change, biodiversity, affordable housing and modes of transport can be seen at times to be competing goals. However, with careful future planning in consultation with local communities, there is the opportunity to create innovative and creative solutions for a carbon neutral and sustainable future for the people and the environment of the ACT

Cities are responding to changing population characteristics; social, cultural and economic diversity; new technologies and a changing natural and built environment. 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.

The District Strategies are meant to capture the special character of each of Canberra's district's and outline their respective planning directions. However, there is no explicit statement of local character for each of the Districts. By capturing the key planning matters the District Strategy can provide clear guidance to help deliver planning outcomes.

The District Strategy provides 'A future vision' but 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 was significant community engagement undertaken in 2021 to establish what the community valued about each district.

Leading practice around the world and within Australia continues to demonstrate that carbon neutral development is both achievable and affordable. New York City has extended this by developing neighbourhood resilience plans acting on both carbon reduction and adaptation and strengthening communities for future impacts. Climate induced resettlement is also focussing many decision makers and with that the reality that new development should not be built in flood prone areas or high fire risk areas in the future.

While the district plans need to be different across the ACT reflecting the needs of local communities and urban growth pressures, there are some basic principles that should underpin district plans in the ACT:

- 1) Mandatory consideration of natural disaster and climate change risks in all land use planning decisions for both new development and urban renewal
- 2) Adopt nature-based solutions across the built environment
- 3) Actively involve First Nations people in the process of plan making and implementation
- 4) Provide a publicly accessible digital platform for continuing community conversations on carbon neutral development
- 5) Provision of an active travel network (walking, cycling) with safe connections to services

(Drawn from Norman, B. 2022, Urban Planning for Climate Change, Routledge, London and Norman, B, 2018, Sustainable Pathways for our Cities and Regions: planning with planetary boundaries, Routledge, London).

1

Inner South

1.1 Key Messages

- Further consideration should be given to how encouraging diverse housing forms to tackle housing stock and affordability issues will be delivered in the Inner South District, noting the character of each suburb throughout the district differs quite substantially.
- Increased access to social housing is identified as a key initiative and supported. However, given the district has “*a generally older population than most other districts, with a larger share in the retiree group aged over 65*”, greater emphasis is needed on catering for the housing and care needs of this sector of the population.
- The proposed, possible and potential future change areas housing yield falls short of the potential housing demand for the district.
- PIA ACT support the prioritisation of industrial land use within the Fyshwick precinct, noting alternative areas are identified to encourage other employment generating uses within the proposed West Deakin employment precinct, East lake Precinct, Fyshwick CIT campus, local and group centres and within the Dairy Road precinct.
- Consideration should be given to other “support” uses/facilities for new employment generating uses, particularly in the West Deakin precinct (such as recreation, food and drink, local shops and long and short-term accommodation (for the hospital, but also, transient workers).
- We support identification of proposed new travel links within the district. However, there are missed opportunities whereby new rapid bus, pedestrian and cycle connections could be investigated. Further, there is a missed opportunity in not identifying a potential future connection between light and heavy rail (along Wentworth Avenue through to Canberra Railway Station).

- We question the methodology behind the “*relative access to existing community facilities*” scale, which lacks clarity. Further, there is a noticeable absence of the provision of new community facilities/services in the district. There are only two (2) x new community services proposed in the Kingston foreshore and in Narrabundah where access is comparably superior to other areas in the district. There should be more focus on new services in areas with poorer levels of access.
- The draft strategy does not identify the need to ensure education options/capacity within the district align with future demand (particularly capacity within public schools).
- New and expanded community/servicing infrastructure identified is very high level and not anticipated to reflect the full extent of upgrade/augmentation required to support the change marked for the district.
- Where areas of change and/or uplift are proposed, there needs to be consideration of potential interface issues where sensitive receivers may be impacted.
- Investigation of planning and design provisions that encourage affordable housing supply should be a short term priority, as opposed to medium term as outlined in the draft strategy.
- In areas of increased density, investigations need to determine how essential elements of the character of the locale (such as canopy cover, heritage) will be retained.
- Advance earlier investigations (generally) on mechanisms to deliver social/affordable/seniors housing to meet the demands of the district.
- On the above, this is an opportunity for the ACT Government to be bold in identifying clear targets (%) on the provision of affordable housing. These targets need to be established in the shorter term to ensure they filter down through to the statutory planning framework that will ultimately determine what is delivered on the ground.
- With seniors housing, this does not simply extend to the provision of accommodation. Consideration needs to be given to enabling the older population to “age in place”. Further, better accessibility to transport options and nearby local/group centres will be critical.
- As a priority, give further consideration, in the short term, to how the shortfall in housing yields will be met.

- Advance investigation on capacity and demand for varying types of employment (and supporting) floor space to ensure the role and function of each centre/employment area is clear and not in conflict with other employment areas.
- In determining preferred employment uses within the new West Deakin Precinct, need to ensure such uses will not undermine the role/function of other existing employment centres. Further, investigations should be undertaken on the extent of change areas in the precinct (to address any potential interface issues) and possible required support facilities/uses (to ensure any future land use zoning, permissible land uses support this outcome).
- Advance earlier investigations of enhanced transport connections through the district. In particular, this should include improved active travel links (to take advantage of the many wide streets that will require less retro-fit of such infrastructure than other areas within other districts), as well as light and heavy rail connections, and cross-border transport connections to Queanbeyan.
- Undertake more detailed investigations, in the short term, on community infrastructure required within the district, to ensure equitable access to a broad range of services and facilities. This would include a review of the existing and future capacity of public education within the district.
- Establish clear initiatives and timeframes for the delivery of support infrastructure to ensure the demands of increased density/population are planned for in advance.
- There needs to be a clear emphasis on the need to ensure that the key qualities, and overall character, of the Inner South district are not compromised by the ambitious targets on the delivery of housing and jobs.

1.2 The Detail

The values/characteristics stated for the Inner South District are supported. The Inner south is centrally located, comprising the “old” and “new”, with leafy suburbs, a heritage “heart”, vibrant community and local centres and special places.

PIA ACT support acknowledgement of the role the planning system has to play in encouraging diverse housing forms to tackle housing stock and affordability issues. However, we consider that greater emphasis should be placed on how this will be delivered

in each district and to investigate other mechanisms to delivering this outcome. This is particularly relevant to the Inner South District given it is characterised by larger residential blocks with a typically lower density residential character. With the generous housing targets outlined, the transition from low to higher density development will be a key challenge for this district. Implementation of varying housing typologies is referenced, but there is no reference to other mechanisms that can be implemented through the planning system (such as incentivising the provision of affordable housing through an uplift in areas marked for increased density/change).

Further to the above, there is an identified initiative (Table 13) to investigate planning and design provisions that encourage the supply of affordable housing. This is identified as a medium term action, whereas we consider this should be a short term action. This should further identify that affordable housing should be delivered in an integrated approach, rather than isolated, so as to ensure diverse and inclusive neighbourhoods. In addition, we do not support the “medium term” timeframe identified to implement the initiative *investigation of planning and design provisions that encourage the supply of affordable housing*. This should be prioritised in the short term.

The need to enhance access to social housing is identified in the strategy and is supported, however, there is very little acknowledgement of the need to cater for the housing and care needs of a district that has “a generally older population than most other districts, with a larger share in the retiree group aged over 65”. Whilst the demographic in the district will likely change over time as density is increased and different housing typologies are introduced, there will remain a need to cater for the aged population, with different levels of care accommodated for, so as to not displace this part of the population. Ageing in place is critical. Further, there is a direction to improve connectivity to transport. Such connectivity needs to factor in provision of equitable access for the less physically abled/accessible parts of the population (aged, disabled/impaired, families with prams/strollers etc).

The proposed, possible and potential future change areas housing yield falls short of the potential housing demand for the district, which is a concern. The proposed, possible and potential future change areas yield is estimated between 4,500 - 10,000 dwellings. This is a huge variation and sits under the “potential housing demand” for the district of 12,400 dwellings.

We support the prioritisation of industrial land use within the Fyshwick precinct, noting alternative areas to encourage other employment generating uses within the proposed West Deakin employment precinct, East lake Precinct, Fyshwick CIT campus, local and group centres and within the Dairy Road precinct.

Reference is made to the need to provide for new employment uses in the West Deakin Precinct (p. 102). There also needs to be consideration of other land uses/facilities to support those employment generating uses – open spaces to provide amenity for workers and visitors, as well as supporting short-term accommodation (this may be for more transient workers or for visitors to the hospital / other medical services). This is in part identified in the initiatives where reference is made to the provision of commercial accommodation for the hospital. This should extend to other supporting land uses.

Whilst a smaller scale contributor, there does not appear to be any acknowledgement of the importance of the group and local centres within the inner south that provide employment opportunities. The Strategy needs to ensure the provision of employment in new and expanded precincts does not undermine existing jobs within those centres.

We support identification of proposed new active travel links within the district. However, there is a missed opportunity in not identifying a possible rapid bus connection and/or enhanced active transport links from Red Hill through to Deakin and West Deakin, particularly along Mugga Way (subject to review on heritage considerations). Pedestrian and cycle connections could further be improved, particularly to provide better connectivity from change areas through to the light rail corridor. This would align with the key objective of prioritising new off-road paths and protected cycleways on key routes and completing missing path links is required to improve active travel infrastructure

We support the goal to extend rapid transport connections through to Queanbeyan. However:

- The timeline suggests this be investigated in the longer term. Suggest consideration be given to initial investigations in the shorter term to ensure practicality of future connections.
- There is a missed opportunity in not identifying future investigation of a potential light rail connection along Wentworth Avenue through to Canberra Railway Station.

We support the objective to enhance access to community facilities. However, the “*relative access to existing community facilities*” scale on p. 113 lacks clarity. It is not clear whether the mapped outcome consider cumulative access to a range of services (arts / health / education / community / recreation). If a site/area has close access to one of these services, is it deemed to have a high level of “relative access”? Need to ensure that particularly, in areas of increased residential growth, that there is improved access to a broad range of community services. Further, the only 2 x new community services proposed are located in the Kingston foreshore and in Narrabundah where access is comparably superior to other areas in the district. There should be more focus on new services in areas with poorer levels of access.

There does not appear to be any reference to the need to ensure there is sufficient capacity within schools in the district to cater for what is proposed to be quite a substantial increase in population and anticipated change in demographic to include more families with children.

Infrastructure augmentation/upgrades, new and expanded community/recreation/green spaces/infrastructure will be critical to support the increase in density and population in the district. Those in the draft strategy are very high level and are not anticipated to reflect the full extent of upgrade/augmentation required to support the change marked for the district. The section on “*supporting infrastructure required*” (p. 123) requires clear initiatives and timeframes.

Where areas of change and/or uplift are proposed, there needs to be consideration of potential interface issues. Such as, for Deakin and West Deakin, the white areas representing change areas are only indicative, and this is noted (p. 118). However, the current boundaries seem to present what could be interface issues whereby increased density could impact on residential amenity of sensitive receivers. Further, future planning should consider pedestrian connectivity through to the future light rail corridor/stops. This has been indicated for West Deakin but not for Deakin.

2

Woden

2.1 Key Messages

- Woden has a small population and contains the Woden town centre. The town centre provides a major hub for employment inclusive of community facilities and an anticipated transport node for Canberra's south side.
- Areas with the greatest suitability for growth includes the Town Centre, Curtin Group Centre and the Mawson Group Centre.
- Key change areas include the Curtin horse paddocks, Curtin edge – north and south, Woden north, Woden town centre, Phillip and Athllon Drive, Mawson and Farrar (north) and Mawson and Farrer (south). Possible locations for additional housing to be sought.
- Economic and employment areas include Woden Town Centre (including Phillip), Canberra Hospital precinct in Garran, including the National Capital Private Hospital, Curtin and Mawson Group Centres and Local Centres. Does this exclude residential? There are initiatives that call for residential use along nodes along the light rail. This should be clearly defined.
- With the exception of Phillip, there are no specific development and site controls for the locations identified within the Woden District Strategy.
- Support for the focus on the light rail but with a supporting transport system that integrates the light rail into the Woden area.
- One of the main objectives is to have an additional 6,600 dwellings by 2063 through infill. There should be specific development and site controls for the town centres and change areas to cater for mixed use developments and support the town centre by not just having a residential tower. Change areas could be identified for the affordable

housing requirements where incentives are given to developers for this inclusion in their developments.

- Include more strategies in relation to increasing the canopy coverage and increasing the permeability. These should be included in the specific development and site controls to help achieve the goals for each of these

2.2 The Details

Main objectives and initiatives include:

- Additional 6,600 dwellings by 2063.
- Enhance linkages from Mount Taylor Nature Reserve north to Oakey Hill Nature Reserve and through Curtin Park to link with Yarralumla Creek corridor and Cotter Road grassland.
- Undertake an ACT-wide analysis of capacity and demand for employment floorspace to inform more detailed planning for Woden town centre, including capacity to meet strategic targets for employment.
- Plan for centres (Woden town centre, Curtin, and Mawson group centres) to apply district strategy objectives in planning for residential and mixed-use development, particularly those supporting economic access and sustainable neighbourhoods, aligned with broader planning for the light rail corridor.
- Future investigations for Light Rail extension for Inner South and Woden Districts.
- Enhance connectivity corridors for priority areas of grassland and woodland and areas of threatened species and nature reserves.
- Review and update planning controls for commercial floorspaces to meet employment targets, including light rail.

3

Weston Creek

3.1 Key Messages

- Weston Creek is predominantly a suburban district with some 82% being detached dwellings, principally single storey with larger block sizes.
- The district is seen as remaining largely unchanged with population increasing by 1300 though infill development by 2063. This limited growth is supported by the community engagement undertaken in 2021 which supports the maintenance of low density housing.
- Presently, Cooleman Court provides major shopping services for the population of Weston Creek and Molonglo. This will change as more commercial, retail and shopping facilities are established in Molonglo. The predicted population growth will mean that Cooleman Court remains as a low level commercial (group) centre.
- There is a future vision for the Weston Creek District but there is little that is specific about the neighbourhood character or its characteristics which could be used to guide future development in the area.
- The area is well established with high levels of natural habitat that provides a good level of urban amenity and character as well as health, biodiversity and sustainability outcomes. While significant levels of trees exist within the green spaces (within and surrounding the district), the larger blocks provide the opportunity to complement the significant green infrastructure.
- There are 6158 people over 65 – 25% of the 2021 Weston Creek population. Little change is proposed to the existing community and recreational facilities, other than to note that people in Weston Creek rely on higher order facilities in other districts and the purpose of the local facilities may need to change overtime in response to changing demographic and usage pressures.

- The draft strategy shows development occurring around commercial centres. This policy will have some effect on meeting the expected increase in population numbers, as shown by population numbers predicted to only increase by 1,300 by 2063. This may protect the amenity that the current community supports.
- Greater consideration should be given to allowing more dual occupancies, as part of a city-wide policy that supports improved dual occupancy numbers in suburban area. For example, there were 190 blocks in Weston Creek affected by the Mr Fluffy Territory Plan Variation (V343). Based on a preliminary analysis in August 2022 of the sites that had been developed, dual occupancies were constructed on 59 blocks. This would suggest that provided the policy settings are right, as shown by V343, that there will be an uptake of dual occupancies, as opposed to the construction of larger homes for the existing dwellings on blocks.
- That the population needs to travel outside the district for community and recreational facilities, is a truism that could be applied to all districts and should not be seen as a reason for the non-delivery of community and recreational facilities in Weston Creek.

4

Molonglo

4.1 Key Messages

- Molonglo is a relatively new District but is growing quickly and already contains much higher density than other parts of Canberra, with 24% in medium density and 35% apartments. It already contains 20% of its expected population.
- It is the main greenfield development area in the ACT. The suburb of Molonglo will contain the main commercial area. It currently has a relatively young population, with many young families. It is close to civic (within 10km) and has large bushland and recreational spaces.
- The directions provided in the strategy seem to be relevant to the district, with its significant environmental, heritage, recreational and natural values including Molonglo River Corridor and associated nature reserves, Stromlo Forest Park and the National Arboretum.

4.2 The Details

Blue Green Network

- The mapping of the Blue Green network and habitat areas conflict with areas that are shown for proposed/ possible/potential development. This is confusing and highlights the competing interests that need to be managed through the strategic planning process.
- Strategic Planning should clearly identify the important connected areas of habitat or green space that need to be retained or improved to provide actual blue green or ecological connectivity through the District and ensure this is then reflected in the Territory Plan.

- The District Strategy should acknowledge the existing EPBC Strategic Assessment Approval for the Molonglo Valley, the NES Plan and the existing Section 211 Exemptions that are in place which mean that the environmental impact assessment for future urban development has already been undertaken. Future development must be consistent with these previous approvals.
- The future Blue Green Connections do not appear to incorporate requirements in the National Capital Plan, or the NES Plan and s211 Exemption which were included in the Molonglo Valley Stage 3 Planning and Design Framework such as:
 - Section 3.3.3 of the NCP (Section 6.9 of the Molonglo Valley Stage 3 Planning and Design Framework). Planning of urban areas in Molonglo should make provision for a distinct, accessible and legible link, of a minimum width of 70 metres between Stromlo Forest Park and the National Arboretum Canberra.
 - Molonglo River Reserve interface – consistency with the Molonglo River Reserve Management Plan (refer Section 6.18 of Molonglo Valley Stage 3 Planning and Design Framework)
 - Patch GG and Patch N interface (refer section 6.19 Molonglo Valley Stage 3 Planning and Design Framework).

Economic access and Opportunity

- The strategy states that consideration is to be made to transition Molonglo group centre to a town centre in future (long term timeframe). This needs to be addressed in the short term, before the sale of land for the centre, as it will substantially impact the potential planning for infrastructure, land services and the existing development within Denman.
- To realise potential economic opportunities, the District Strategy should be specific about the desire to generate a certain type of outcome, to make future planning pathways more streamlined.
- Molonglo could leverage its characteristics to create a focus for particular activities such as mountain biking and outdoor tourism (as the strategy suggests), but concessions might have to be made to other recreational users if this is the focus. Decisions around this could be made and identified in the district strategy as the intended outcomes for the district or certain parts of the district.

Strategic Movement

- Development to date has been impacted by slow delivery of infrastructure such as the Molonglo River Bridge, planning for future infrastructure throughout the district needs to be brought forward so that it is delivered in a more timely manner.
- Priority should be made to delivery of key active travel and public transport routes to encourage uptake of these modes rather than private vehicles.
- Development should be planned so that buses can circulate easily in a manner where they are accessible by the majority.
- Much of the 800m catchment around the Molonglo Group centre will be within the river corridor. This centre is substantially constrained by the river corridor. Consideration could be made for two larger Group centres within Molonglo rather than a Town centre due to the constraints at the Molonglo Group centre location. The site of the second group centre in Molonglo Stage 3 may have a larger potential development area within the 800m radius from the centre and not as proximate to sensitive ecological values.
- Figure 34 should identify key destinations such as Stromlo Forest Park, the Arboretum, Namarang Nature Reserve, Kama Nature reserve to ensure movement connections between these are a priority. There are also existing connections available for active transport across the Molonglo River that are not shown on this plan.

Sustainable neighbourhoods

- How will the ACT Government ensure that 15% of new housing is social and affordable? There needs to be incentives, or reduced LVC to deliver this by the private sector.
- The District strategies should be aiming for all neighbourhoods to be sustainable and walkable.

Inclusive Centres and Communities

- The Strategy notes that District playing fields would be needed to meet future demand and that these may not be able to be contained within the District. However,

the Stromlo Forest Park Master Plan indicated that playing fields were to be included as part of future potential development on this site, but it is not included in the Strategy. The Strategy should make decisions about these facilities and their most suitable locations.

- The Strategy does not include detail about actual sites needed and capacity for community facilities but defers these to future assessments and planning. The Strategy should be identifying the appropriate sites for these so that these can be facilitated through the Territory Plan.
- Planning for the needs of the community must consider future requirements and be adaptable. Playgrounds might be relevant today when the community comprises mostly young families, but what happens in 10 years time?
- What about provisions for older people as the area matures and changes. Wright and Coombs have now been developed for nearly 10 years and the demographic will change.

Supporting Infrastructure

There are several examples in Molonglo where development has occurred ahead of the infrastructure required to support it, for example much of Whitlam has already been developed without the construction of the Deep Creek Urban Pond to provide the supporting water quality and management infrastructure.

Infrastructure planning and delivery needs to occur more efficiently in Molonglo to support the developing community.

5

Inner North & City

5.1 Key Messages

- The Inner North and City District have done the 'heavy lifting' of the Government's compact city policies. This role is anticipated to continue with apartment and multi-unit numbers expected to increase.
- As issues are being raised about the increase in density and what impact this will have on the area, it is important that density be done well, that is the design quality enhances the existing character of the area and blue/green/social infrastructure be provided to meet the needs of the people that will come to live in the area.
- A Local Character Statement is needed to guide future development in the Inner North and City.
- PIA ACT consider that the following points should be incorporated into the Inner North and City District Strategy as it goes to establishing what are the key features of the area and how these should be considered in establishing 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 provided as part of diverse housing developments
- 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
- school sites/community land – sale of school/community sites was needed to provide for the educational needs of a growing population. The sale of such land was not supported.

5.2 The Details

PIA ACT consider that the development of character statements for the Inner North should incorporate the following attributes. The local character of the Inner North and City is typified by:

- The visual backdrop formed by Mt Ainslie, Black Mountain and Mt Majura
- Suburban streetscapes
 - Mature and impressive
 - 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
- High density developments around centres and along transport corridors
- 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
- Community inputs need to be addressed, 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 needs to recognise that neighbourhoods include elements that are :
 - Never static but need to respect the past, acknowledge the present and be flexible and able to respond to future demands
 - Uplifting, inspiring and liveable
 - Contain an extraordinary range of public spaces that attract people to meet, relax and celebrate
 - Typified, but not exclusively, by low density, single storey family dwellings with high density developments around centres and along transport corridors.
- 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
 - 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
 - Good footpaths and bike paths
 - Well-designed streetlighting
 - A good social mix
 - 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 and 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.

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 but a broader cross-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, in essence 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 is owned, managed and maintained by the government.

Play spaces should also meet the needs of people of all ages, such as older people, and people from different ethnic and cultural backgrounds providing essential benefits for city dwellers through facilitating inclusion, recreation and health and crucial habitat for wildlife. Hassett Park at Campbell 5 is an example of a park that provides recreational opportunities for people from all ages, cultural and ethnic backgrounds.

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.

6

Belconnen

6.1 Key Messages

- Belconnen is an established District, with established suburbs and community. Belconnen is grappling with densification, and how the draft District Strategy will facilitate the expected population growth and densification of existing Belconnen suburbs
- As Belconnen is the largest District it has a great scope for rezoning around group and local centres to revitalise spaces
- Belconnen is home to failing local and group centres
- Belconnen has opportunity to increase housing diversity and address its 'missing middle' shortage
- Rethinking zoning of failing commercial centres, in consideration of the number of local and group centres in Belconnen within a close proximity, including residential, childcare, or other uses
- Rezoning around local and group centres to support densification and encourage housing diversity, including the 'missing middle'.
- Opportunity for densification around local and group centres to be considered beyond the south eastern suburbs of Belconnen

6.2 The Details

PIA ACT supports EPSDD's vision relating to '*possible centre revitalisation opportunities*'. The Belconnen District Strategy acknowledges that Belconnen has one town centre, five group centres and 24 local centres, and acknowledges some centres are struggling to trade.

The Belconnen District Strategy's proposed solution is to re-invigorate the small centres. However, new retail in struggling local centres does not support the community, rather exacerbates the problem of a greater number of centres than the population demands. Estate Development planning and ideology along with how we live has shifted from when the majority of when the Belconnen suburbs were built.

It is important to assess the functionality of these local centres and their proximity to one another. As an example; Scullin, Page, and Weetangera are local shops, accompanied by Hawker Group Centre and Macquarie Group Centre which have all been identified as *'possible centre revitalisation opportunities'*. These local and group centres are in such close proximity, to the Hawker, Florey, Macquarie, Cook and Aranda local centres which have not been identified for upgrades, that the 10 local and groups centres mentioned above are within a 5-kilometre radius of each other, in addition to the Belconnen Town Centre.

Local amenities are important to the local community, however it might be worth the ACT Government rethinking the zoning opportunities for struggling local centres, so that funds can be directed into providing better upgrades to selected local centres.

If the ACT Government is planning to reinvigorate these local centres, the strategy will need economic backing to understand what allied uses are required to support the additional retail, in area of struggling local centres, ie co-locating residential, child care centres and the like.

While 'Housing and Affordability' under the Belconnen District Strategy is acknowledged, there is no strategy for how this growth will be achieved. The 'missing middle' is acknowledged as a challenge for the district of Belconnen. The District Strategy nominates appropriate centres for growth including; Jamison, Macquarie, Weetangera and Hawker (page 88). As previously identified in this submission, Belconnen has a high proportion of local and group centres. Belconnen is posed for infill development, and zoning uplift to support these centres, and fill in the 'missing middle' for Canberra.

Under the heading of 'Housing Affordability' there is a paragraph dedicated to active streets and canopy cover, which are misplaced under the 'Housing and Affordability' section.

Under community feedback, table 9, heading, 'compact and efficient city', the community have identified the below three points are important –

- Maintain green spaces, including the river corridor
- Focus more dense urban areas near commercial centres
- Maintain and increase shady trees

As has been identified in the Belconnen District Strategy, Belconnen has large open spaces and shady trees, including large eucalypt trees. While the community desires are understandable, from a regulatory perspective and a budgetary maintenance perspective, the desires are at odds with each other for the following reasons –

- Large eucalypt trees are not always appropriate within urban settings within proximity to dwellings and roads, due to susceptibility to storm damage and the safety risks they present
- There is not enough funding of maintenance of trees and open spaces in Belconnen, how can the ACT Government afford to plant and maintain more
- The ability to achieve a ‘missing middle’ scenario around commercial centres and increase tree canopy cover is a significant challenge, within the context of Belconnen

Under Future housing and jobs, the District Strategy identifies the demand for housing in Belconnen will require an additional 20,800 dwellings by 2063, with 16,500 dwelling being infill development. Without an uplift in zoning for significant parts of Belconnen, how is this infill target proposed to be reached? A supporting infill housing strategy is required to identify how housing will be delivered within Belconnen.

PIA is supportive of the ACT Government Plan for light rail to be extended to Belconnen. In preparation for the light rail expansion, PIA encourages the ACT Government to rezone the light rail transport corridor to Belconnen as part of this Planning system review.

Under the Heading ‘Sustainable Neighbourhoods’, the target sets – *‘new development in future should incorporate new social and affordable housing, including the 15% target on residential and release sites in the ACT Housing Strategy’*. The 15% target in delivering affordable is a reasonable response to the current housing climate. However, does this 15% of affordable housing consider infill development? Will the metric to meet the housing affordability metric be achievable to the market? What is the housing product delivery to meet, housing affordability, apartments or with the 15% be scaled across a diverse housing mix?

Mapping feedback -

- The Belconnen District plan, when printed, does not align from one page to the next, ie unable to accurately match the roads.
- The Macquarie local centre is not identified on the Belconnen District Strategy Plan.
- On page 11, there is a circle, without a number on the Belconnen District Strategy plan, by the legend, number '1' is missing.

7

Gungahlin

7.1 Key Messages

- The Gungahlin District has experienced rapid growth and development over the past few years, with the population in the area projected to increase significantly in the coming years. However, one of the main challenges faced by the region is the lack of adequate public transport connectivity, particularly in the northern suburbs of Gungahlin. This has resulted in traffic congestion, increased commute times, and a lack of access to essential services for residents in these areas.
- Enhancing public transport connections between the Casey, Moncrieff, and Amaroo group centres and the growing suburbs north of the Gungahlin town centre is a crucial step towards addressing the transportation challenges faced by the Gungahlin region.
- New greenfield suburbs (Jacka and Kenny) proposed to be developed as exemplars of sustainable neighbourhoods, potentially including zero carbon transition initiatives. However, there are around 10 areas shown as key sites and changes are (proposed-possible-potential) which can be considered as exemplars of sustainable neighbourhoods as well. Also, the Draft Strategy does not establish how this will be achieved.
- The delivery of new community and recreational facilities in Gungahlin is critical in addressing existing gaps and future demand. The development of new schools, a community centre, and other recreational facilities such as the Amaroo Tennis Centre and the Casey Community Recreation Irrigated Park (CRIP) will contribute to promoting the community's overall well-being, social cohesion, and economic development.

- The provision of employment floorspace, particularly for office use, in the Gungahlin town centre, and the strategic positioning of the centre to attract future development are critical in creating economic opportunities in the area. By creating a vibrant and thriving commercial hub, Gungahlin can attract investment, create job opportunities, and promote local business growth, contributing to the overall economic development of the area.
- The district includes the Mitchell industrial suburb, the soon to be established suburb of Kenny in the south-east, and new suburbs such as Taylor and Jacka in the north. refer to figure 37. There is a noticeable absence of community uses in the proposed new suburbs, which could have negative impacts on the liveability of the area and raises concerns about the ability of the area to support a strong sense of community and social interaction.
- As the population increases, so does the demand for essential amenities and recreational activities, requiring improvements to existing facilities and the development of new ones. This is crucial for promoting the overall well-being of the community and contributing to social cohesion. By investing in community and recreation facilities, Gungahlin can continue to thrive and create a more liveable and sustainable community. The Strategy needs to identify sufficient community facility land and facilities to cater to expected population growth in planning for greenfield suburbs. Greater consideration should be given to allowing more community and recreation facilities.
- Gungahlin town centre and the Mitchell industrial suburb will continue to be the main employment locations within the district, with local services and population-serving jobs also concentrated in group and local centres. The current concentration of economic activity might not be sufficient to meet the needs of the growing population and that there is a need for a more diverse range of employment opportunities across the district. Casey can be a good example that has capacity for future employment opportunities. Advance investigation is needed on how employment opportunities will be delivered in the district.
- Considering the significant population growth and potential future urban expansion in Gungahlin, the proposed economic development and job changes do not appear to fully align with the growing demand and needs of the community. Based on the 2016

and 2021 Census, Gungahlin has a smaller share of jobs compared to its population, which suggests a potential mismatch between the number of available jobs and the number of people who reside in the district.

- The suburb of Gungahlin is a bustling and rapidly growing community that deserves a safe and vibrant night-time economy.
- The lack of inclusive centres and communities in the north of Gungahlin could lead to feelings of exclusion and marginalisation. To address this issue, it is important to conduct an analysis of the existing infrastructure and facilities, identify gaps in services, and develop strategies for addressing them. This may involve designing and building new inclusive centres, providing funding and resources to existing centres, and ensuring that new and existing facilities are designed with inclusivity in mind. A collaborative approach involving local residents, community groups, and government authorities is necessary to create a more inclusive and welcoming community for all.
- Identify and prioritise local-scale projects to promote active streets, celebrating existing leafy areas and local centres, in line with the implementation of the ACT Transport Strategy, and integrating urban improvement approaches – This should be prioritised in the short term.

8

Tuggeranong

8.1 Key Messages

- The Strategy anticipates the need to accommodate 4,800 new dwellings up to 2063. This equates to 120 dwellings per year for 40 years. The Strategy confirms that 80% of all dwellings are separate detached houses. Based on the 2021 census this means that there are over 36,000 detached dwellings on single blocks. Based on typical subdivision patterns of the 1970s & 80s (when most of Tuggeranong was developed), there would be a significant proportion of those single dwelling blocks that are considered 'large' blocks.
- The housing target could be achieved by adjusting planning controls for less than 0.5% (per year) of all blocks to facilitate either dual occupancy or other forms of low-medium density housing. This would indicate that the Strategy has identified far greater areas for change (e.g. the yellow shaded Future Investigation Areas, the 'Proposed, Possible and Potential Change Areas' and the 'Strategic Investigation Corridors') than is necessary.
- The Tuggeranong District represents about 20% of the ACT population but employs only 8.7% of employed persons. This means that about 34,000 people leave the Tuggeranong District each day for employment. While we support investigations to increase employment opportunities in the town centre and throughout the District, it is clear that the District Strategy should have a strong focus on movement of commuters from residential areas to places of employment in other parts of Canberra.
- It is not clear how the analysis of employment data has contributed to the identification of employment hubs in the Strategy. The data indicates that 43% are employed in knowledge intensive industries and this will increase to 49%; with the current 29% in population serving employment reducing to 10%. However, census data indicates that

Tuggeranong has far fewer persons with Tertiary qualification (28% compared to ACT at 43%) and far greater number with trade certificate (16% compared to 10%). This would indicate a significant proportion of trades persons and persons employed in retail trade or similar, over those employed as managers and the like. As such, it is not clear how the employment categories will change so significantly and possibly rather than identify group centres as employment hubs for tertiary educated type employment (e.g. offices), possibly the Strategy should identify opportunities to assist trades people, like small scale service areas for storage and trade vehicle parking etc (relieving pressures in residential areas)..

- The Tuggeranong District Strategy includes that southern part of the industrial suburb of Hume. The splitting of Hume partly into East Canberra District and partly within Tuggeranong District does not make any sense.
- The rural areas south of the Tuggeranong Urban area are not appropriately covered in the Strategy. We suggest that there is opportunity for a separate Rural Lands Strategy.

8.2 The Details

Blue Green Network

- Significant investment has occurred over recent years in water quality control measures, however, the water quality of Lake Tuggeranong continues to decline with the poor water quality resulting in the lake providing limited water-based recreation opportunities. While the objectives to '*enhance the green network*' and to '*conserve, restore and reconnect catchments*' are supported in principle, the Strategy does not identify any actions to achieve an enhanced blue-green network. It is possible new approaches are necessary and we consider that the District Strategy should be the catalyst to instigate such approaches.
- The Strategy should provide greater clarification of the role of open space around Lake Tuggeranong.
- The principle to enhance connections within the green network does not specify whether the enhancement is for the benefit of the natural environment or enhanced for human movement (in its various forms). In some circumstances these would be

mutually exclusive with additional infrastructure to enhance human movement potentially detrimental to the natural aspects of the green network.

- The Strategy identifies a possible future connection in the blue-green network around the south-west of the Tuggeranong Town Centre. This connection already exists, it is known as the Bi-centennial trail within the Murrumbidgee River corridor.

Economic access and Opportunity

- Ongoing place planning for the Tuggeranong town centre is supported. While light rail may be some time away, an improved multi-function transport node should be investigated in conjunction with opportunities to significantly change vehicle movement patterns in the town centre.
- It is noted that the draft Strategy has not taken the opportunity to reconsider the potential for urban development between the town centre and the Murrumbidgee River. This initial proposal was rejected some years ago due to community concerns before any detailed environmental impact assessment could be carried out. As a result there is limited opportunity for future higher density development in the town centre while unless the commercial uses in the service trades area is redeveloped for residential.
- The Strategy should consider any opportunity to create a new service trades area, possibly separate to the town centre (e.g. Drakeford / Jenke commercial area). Alternatively future proposed 'place planning' for the town centre should address the potential to integrate service trades land uses with residential development.
- The potential for development along the Athllon Drive corridor, at the Wanniasa group centre and Drakeford Drive intersection, is noted. However, a significant proportion of the land adjacent to this arterial road is zoned a public open space and is mostly planted with native vegetation which contributes to the character of the area. Any increased development in these areas should not result in loss of native tree cover or areas of public open space.
- The Strategy proposes that an analysis of all group centres be undertaken to understand their economic function and capacity for more employment floorspace. It is not clear why this work is not part of the Strategy and the outcomes included as part of the future directions for the Strategy.

- Without the analysis suggested above, the Strategy concludes that Calwell is a centre that could focus on *'enhance(d) opportunities for accessible employment for residents in nearby suburbs'*. It is not clear how this conclusion could be reached. Other than existing retail uses, Calwell Group Centre does not provide any employment opportunities. It is not located near any major strategic corridors and while it is served by a rapid bus route, this is a route that meanders through suburbs rather than a direct line along arterial roads. If the Strategy is to succeed and Calwell is to be a major employment hub, then we suggest that there needs to be significantly more justification and explicit planning changes detailed in the Strategy.

Strategic Movement

- We support the proposals to undertake further investigation and future delivery of the light rail network to Tuggeranong town centre, including potential for economic corridor and enterprise activity nodes at Wanniasa group centre and Drakeford Drive intersection along Athllon Drive.
- Isabella Drive from the Tuggeranong Town Centre past Chisholm group centre and into Hume (and possibly through to Fyshwick) is supported as a strategic corridor with potential for rapid transit for commuters.

Sustainable neighbourhoods

- It is not clear why the *'further detailed analysis and modelling to identify future housing needs'* has not been undertaken as part of preparation of the Strategy. Without such analysis it is not possible to determine the extent of change necessary within the *'proposed, possible and potential change'* areas or the *'future investigation areas'*.

Inclusive Centres and Communities

- While investigation of appropriate planning initiatives to support local and group centres is supported, it is not clear why the specific group and local centres have been selected. There does not seem to be any rationale for the identified centres in relation to any strategic role those centres play within the Tuggeranong District.

- Again, we support '*detailed localised analysis to inform and confirm the need for new community and recreational facilities*' but consider this should have been basic research to inform the draft Strategy itself.

Other matters

- The Strategy refers to the Tuggeranong District as Ngunnawal Country. However, there is some dispute to this, with some claims that Ngunnawal areas are to the north and Tuggeranong is Ngambri/Ngarigo country. We recommend EPSDD seek further clarification from all First Nations groups.
- An area north of Macarthur is identified with a line of green dots. There is no legend reference on the maps to indicate what this is for.
- The map on page 85-85 shows Erindale Library as a 'destination'. While community libraries are important we consider, in planning terms, that identifying this as a major destination is a bit ambitious.
- Potential development associated with the Murrumbidgee Golf Course is not shown as a proposed, possible or potential change area.

9

East Canberra

9.1 Key Messages

- The draft East Canberra District Strategy seems to be a series of unrelated “possible” change areas. It does not seem to have progressed from the previous studies undertaken throughout the area such as the Easter Broadacre Study.
- The Strategy is heavily skewed towards industrial development, with only one of the East Canberra initiatives mentioning the capacity within the district for agriculture and food production.
- The Strategy does not adequately consider agriculture and tourism economic opportunities.
- The Strategy places the highest priority on perceived economic development rather than maintaining the cultural and heritage values, social and ecological benefits, and creating a food and flood buffer for the city.

9.2 The Details

Blue-green network

- The aim to ‘*enhance, restore, and connect priority areas of grassland, particularly north of Canberra Airport*’ potentially contradicts with areas identified as future employment precincts.

Economic access

- We strongly support proposals to partner and collaborate with the NSW Government and Queanbeyan-Palerang Regional Council to investigate a coordinated, strategic approach to cross-border infrastructure.

- While the Strategy seeks to retain capacity within the district for agriculture and food production in the district, there is no explicit actions to achieve this.

Strategic movement

- The Strategy indicates that major transport corridors (road and rail) should be protected and surrounding land subject to specific planning controls which benefit these assets and support their function, but fails to identify these corridors.
- We strongly support any investigations for potential for a high-speed rail connection through the district including the best means of protecting the corridor through leasing arrangements and planning provisions. However, are concerned that the Strategy suggests that this should be undertaken over the longer term. Planning for high-speed rail is needed now.

END OF PIA SUBMISSION