

## Submission on the Draft Woden Planning Strategy and associated documents

I live in Curtin, and what is being proposed for Curtin worries me greatly.

I have found during my time here that there is a strong sense of community in Curtin—a community that the residents truly value, as evidenced by strong community support for fairs and events in Curtin Square, for the schools and for local online debate. I have lived in five other Canberra suburbs and many suburbs overseas but have not found that same sense of community.

Community strength and connectedness is important for the mental health and physical wellbeing of people of all ages.

The Draft Woden Planning Strategy is in very grave danger of destroying that quality of community cohesiveness. The Strategy, if enacted, would damage the fabric of Curtin and its attractiveness to current and new residents, as well as its sense of community, specifically the plans for the:

- 1 proposed road along Yarralumla Creek and the subsequent erosion of green recreational and 'active travel' space
- 2 proposed vehicle bridge connecting the former North Curtin Horse Paddocks to north Curtin
- 3 lack of sufficient amount of mandated, legislated and enforced tree cover in suburban blocks
- 4 apparently haphazard subdivision of blocks
- 5 suggestion that RZ1 blocks will be effectively re-categorised as RZ2, which would allow dual occupancy anywhere
- 6 surreptitious raising of the height limit of single-storey shops in the Curtin Group Centre
- 7 classification of a single (restaurant) site as a 'local centre'
- 8 proposal that 'community and retail facilities' should be placed within the Yarra Glen – Melrose Drive roundabout
- 9 reduction in community consultation in planning matters.

I address these points individually below but emphasise that they are linked. A coherent plan is needed, not contradictory and speculative planning 'ideas'.

**1 Proposed road along Yarralumla Creek** This well-used community space would no longer be able to fulfil its function if it were carved in half by a road lined with blocks of apartments between 3 and 6 storeys in height. Not only would the apartments increase the number of cars on the road, increasing the danger to people crossing the road to the green space, but would also cause more pollution from nitrogen oxides, at least for the next 10 years or more until the take-up of electric vehicles is complete. Removing the trees to allow building of the road would reduce amenity for residents, adversely affect the existing rain garden and Flood Memorial, contribute to summer heat build-up (already high and likely to increase with climate change) and reduce the standard of living for current residents in that area by removing their treed outlook.

I believe that Curtin and the surrounding suburbs—all of north Woden and South Canberra, in fact—would be better served by transforming Yarralumla Creek and its associated green space into a linear park as part of a strong, well-planned, ACT-wide 'blue-green corridor'.

This would include separate walking paths and cycleways to make walking safer; access by pedestrian and cyclist bridges from Hughes, Deakin and Yarralumla; a children's playground; well-planned treed and open areas with a variety of deciduous and non-deciduous trees; well-placed seating and barbecue areas to promote community communication and enjoyment—in short, a community resource to promote health and wellbeing for residents of north Woden and South Canberra. The linear park could draw people from other parts of Canberra as well as visitors to Canberra, especially if it extended to and joined the National Rock Garden, National Arboretum Canberra and National Zoo & Aquarium.

**2 Proposed vehicle bridge across Yarralumla Creek** This bridge was proposed to connect the new road described above to the embassy area in the former horse paddocks. As the road is demonstrably deleterious to the residents of Curtin, there is no need for a new vehicle bridge.

I understand that the original plans for the north Curtin – Yarralumla area showed a well-planned intersection that allowed easy access for vehicles from Cotter Road to Yarra Glen and vice versa. I submit that it is time to revisit that plan. It could incorporate much better access to the planned embassy area and the proposed residential dwellings along Yarra Glen in the former North Curtin Horse Paddocks. I suggest that the cost would most likely be similar to the proposed 'edge street' and would allow better planned development of the new embassy and residential area.

A bridge for pedestrians and cyclists, however, would be of great benefit to walkers, cyclists and e-scooter riders for 'active travel' and recreational use, particularly if the paths for pedestrians were separated from paths for bicycles, e-scooters and the like.

**3 Lack of required, legislated tree cover in suburban blocks** The proliferation of concrete driveways and hard impermeable surfaces around dwellings is increasing. Mandating a sufficient level of vegetation and tree cover to manage over-heating is critically important to help reduce the effects of climate change. The level included in the plans is so low as to be largely ineffective; it is well below the 40% required to make a difference.

Trees and green vegetation help to cool urban and suburban residential areas as well as take up and store water. They reduce water run-off, localised flooding and over-burdening stormwater drains and creeks—all critical concerns for Canberra in the future.

I believe that trees are not simply decorative: they are necessary for peoples' health and wellbeing. In an age in which mental health problems are increasing, we should be planting many more trees, *not* removing them and replacing them with small 'pocket parks', as was stated at a local meeting held by the ACT Government.

**4 Unplanned subdivision of blocks** The unplanned nature of subdivision ('dual occupancy') was exacerbated by policies surrounding the 'Mr Fluffy' blocks, which allowed any block so affected to be subdivided, regardless of the block's location or suitability. Now that most of the Mr Fluffy blocks have been sold and built on, the policy should be revisited to allow for more planned development. *See item 5 for more discussion of this point.*

**5 RZ1 blocks to be effectively re-categorised as RZ2** Allowing dual occupancy on any RZ1 block is, in effect, re-categorising these blocks as RZ2. This would allow unplanned, haphazard subdivision of almost all residential blocks in such a way that the character of the area (which attracted the residents to the area in the first place) would be lost. It is not good enough to say 'Suck it up' to the existing residents. These people have invested money, care and, most importantly, emotional attachment in their dwellings and surroundings. The proposed changes promote uncertainty and even fear, and can affect people's mental health.

I am not against careful, considerate, appropriate planned development—I *am* opposed to badly planned, haphazard development to satisfy short-term financial goals and contradictory population projections, as the Draft Woden Planning Strategy appears to be.

#### **6 Raising the height limit of single-storey shops in the Curtin Group**

**Centre** Surreptitiously raising the maximum height of these single-storey shops from 5 metres to 6 metres, without any community consultation—and knowing that the community fought hard to keep the existing 5-metre height limit—is against the provisions of the legislated Curtin Group Centre Precinct Code and is, in effect, telling the community that its views don't matter.

It is very important to Curtin residents and others who shop at Curtin Group Centre that the levels of sunlight in Curtin Square are maintained, as evidenced by community rallies and meetings held over a number of years.

**7 Classification of a single (restaurant) site as a 'local centre'** This classification of 83 Theodore Street (Block 23 Section 29 Curtin) would allow a cluster of greater residential development nearby, with no actual, physical local services to support that development—and there is no space to provide other services, suitable access or parking. The 'local centre' classification of this single block should be removed while allowing a 'local shop/restaurant' business to operate.

**8 'Community and retail facilities' in the Yarra Glen – Melrose Drive roundabout** This idea is not workable: space is limited, access is limited, it is a flood zone, any development would be split in two by Yarralumla Creek and the planned light rail tracks, and it would be dangerous for pedestrians and cyclists who attempt to cross roads that are already busy and would become even busier in the future.

This area should be part of the linear park discussed above in item 1. It would be much-needed recreational treed green space for residents in the nearby apartment complex.

The associated retail and community development on Yamba Drive could be accessed by the existing driveway to the 'Stellar' building on Launceston Street but pedestrian access could be circuitous. A retail development there would be cut off from other retail development as well as prospective customers. As has been suggested in community meetings, it appears that 'community and retail facilities' and 'offices' are code for later substitution of residential apartments during development, as shown around the Woden Town Centre, for example.

**9 Reduction in community consultation in planning matters** Residents of Woden need more-transparent planning processes, not less. We live in Woden's suburbs, and are deeply concerned about the direction that planning processes are taking: less community-focused, less inclusive, more hidden, more dictatorial and more removed from Canberra's citizenry.

The ACT would benefit from planning processes with wide, ongoing and open consultation in which Canberrans will actually be listened to and their views be genuinely acknowledged and taken into account when drafting policies and implementation documents.

The proposal for an edge street along the North Curtin green space is destructive and unnecessary. The ACT Government places strict, and frequently unreasonable, requirements on home-owners for any activity that would damage trees, yet appears to have little compunction about destroying trees and green spaces itself.

A street following the green space south of Yarralumla Creek would entail the destruction of scores of attractive trees, a bike and walking path and a beautiful space used and loved by many. Instead, it would create a busy thoroughfare between Cotter Road and Yarra Glen, which would destroy the tranquillity and amenity of this popular area.

The only path from Cotter Road to Yarra Glen, at present, is via McCulloch Street and Carruthers Street. The creation of an edge street would provide a “short cut”, and the few intersections would encourage speeding and other anti-social behaviour in addition to other forms of safety hazards and noise. The speed humps that already exist in McCulloch Street provide evidence of such problems, which would only be transferred to the edge street.

And it is so unnecessary. The proposed area is already fully developed and already has adequate road infrastructure; any further road construction would be detrimental and wasteful. The area between the old brickworks and the Mint is already slated for extensive development, and this is the area that requires further road infrastructure.

To create a thoroughfare between Cotter Road and Yarra Glen, a cheaper and less destructive solution would be to take a road northward from Yarra Glen directly to Cotter Road. In the opposite direction, a roundabout and road could be created to the north of the Mint Oval from Denison Street to Yarra Glen, an area that is little more than scrub adjacent to offices. Traffic from Cotter Road could exit via Dudley Street, cross the Kent Street bridge and turn right into Denison Street and thence to Yarra Glen.

Noting the already heavy traffic in this area and the likelihood that further development of Canberra’s northern suburbs will place additional burdens on Cotter Road traffic, a road interchange joining Cotter Road, Yarra Glen, Adelaide Avenue and Dudley Street would be the best solution; however, this only remains achievable while development of the area is yet to commence.

Please give this serious consideration. Many people are unaware of the proposed changes, and the number of comments provided gives a poor representation of the number of those who would be affected.

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.

Where is the analysis of Mobility-as-a-Service, the future of public transport infrastructure? The blind application of light rail is lazy, poor quality public policy and shows a fundamental ignorance of emerging technology.

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. The destruction of green canopy shows a complete disregard to the effect of climate change. The proposal would start to transform the inner south from an area of good green coverage to a heat sink. It is unconscionable public policy and speaks to developer greed, not citizen amenity or environmental needs.

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?

I am a resident of Curtin for over 30 years, and Belconnen for 15. I believe that the attempt to create a new territory plan is a worthy goal, but I am appalled by the nature of this proposal. It attempts to blind voters and residents by doing it all at once, with a mass of change documents that have little justification and no consistency or coherence. The whole change proposal is contaminated by its arrogant and authoritarian approach.

The proposal is an enormous number of documents that all have different effects on a new planning system and a new territory Plan. The documents are inconsistent in style, in nature, and are contradictory in their contents. Planning policies and desired outcomes say one thing while draft planning strategies say other things – all at odds. The community and the Legislative Assembly must be given voice to consider and discuss of these changes – and not all at once.

Subdivision of residential blocks anywhere in Canberra RZ1 zones is an example, apparently permitted under one policy and forbidden in another. Subdividing blocks must be permitted only if there is a strong requirement with a definite goal of moderating temperatures: this requires tree canopy cover of at least 35-40% as required in the recent Draft Variations and policies that were passed by the Legislative Assembly; and similarly for the ratio of permeable surfaces. The requirement should not be expressed alone in terms of block area but should consider position and access (corner blocks, size, depth or frontage width). It is widely acknowledged that in recent new developments the block sizes, house sizes and other conditions for canopy cover are a poor match and have created suburbs with poor outcomes. Aiming to reduce existing blocks to the cramped, unsatisfactory block sizes of recent development areas would be a bad mistake, and requires a firmer control than the 20% canopy in the proposal.

The planning policies incorporate parts of the existing precinct codes, but make significant changes to increase building heights in shade-sensitive areas (Policy D7 Woden, assessment requirements Curtin) as well as welcome small additions that are improvements (the support for the Radburn area in Curtin Assessment Outcomes). The building heights around Curtin square were established at 5 metres after many years of consultation process through the Curtin Group Centre Master Plan and legislated in the Curtin Precinct Code. No explanation for this change to 6 metres is given and no explanation is likely to be acceptable to the community.

The removal of mechanisms for realistic consultation and review of development proposals will remove much of the trust that the larger community has in planning decisions. This trust is already weakened by instances of very poor enforcement of development conditions. While the overall outcomes of the new Plan may have been decided to be desirable by the processes of responsible government, those policies should be separated from the mechanisms and planning instruments – as policy can and should change over time. All planning decisions must be enforced! Policies that have no consistent implementation are a waste of everybody's time and a lie to the world if not enforced.

The plans contain no integration of the intended light rail through south Canberra, Woden and Tuggeranong except in general terms (almost a 'cargo cult' approach: build it and many good things must follow without any further design effort). Two aspects: the development of

south Curtin and north Woden because of the mere proximity of the tracks, regardless of any planned or likely tram stops or any of the conditions for founding commercial development; and the development of the group centres of Curtin and Mawson group centres as economic zones because they will be connected by light rail (connected to Woden and Civic rather than just to each other, presumably).

Without any indicated next level of plan this is absolute nonsense. The possible development of Mawson as an economic zone in draft policy does indicate land sites and building development in Mawson group centre that might support economic zone development. By contrast, Curtin group centre has no development sites zoned or indicated, the policy assessment requirements state that its car parking is to be preserved, and a policy assessment outcome is for 'a mix of uses encouraging people to spend time in the group centre'. This is valuable as an outcome for all small group centres, but is nothing like an economic growth zone. There is no zoning of commercial space or rezoning of residential areas around Curtin Group centre given to enable this, and it would be unacceptable to Curtin residents.

The planning documents for Curtin and North Woden ignore any consideration of where the tram might stop: stage 2B stops have been indicated at only the intersections near Cotter Rd (Mint Interchange), Carruthers St (Curtin group centre), and the Phillip Oval, well south of the big roundabout. Adding more stops in between can only slow the already slow tram down and is unlikely to be allowed by the light rail designers. The existence of the light rail tracks does not provide access for people – only light rail stops do that. Most of Curtin edge between Curtin centre and Phillip oval can only have a view of the tram tracks across the creek, which inhibits any access even if there were additional stops.

There is no integration of policies and directions: densification policy, subdivision of residential blocks, tree canopy cover policy, and any coherent transport plan including light rail, electrification of vehicles and increased active travel, with blue-green networks. The proposal for additional edge streets with 3, 6 or 12 storey development cannot fit within the Yarralumla Creek-Yarra Glen corridor, not because of the increased population or building heights, but because there is no room on the ground. The desirable benefits of the blue-green network in Curtin and North Woden would be rendered impotent. The corridor is already intended to carry the Yarra Glen roadways, light rail tracks, active travel pedestrian, bicycle and e-scooter pathways. There must be space also to separate wheeled active travellers from those on two and four feet: commuter cycling and scooting does not mix with pedestrians. The crowding is made worse by considering development of commercial or community facilities within the small space enclosed by the Yarra Glen-Melrose Drive-Yamba Drive (and light rail) roundabout, on flood channel and flood plain. The nearby Woden Flood Memorial is in this corridor for a good reason: that flooding killed people. The existing rain garden infrastructure should not be ignored; it mitigates flooding and runoffs and is almost the only existing realisation of 'blue-green' in the network.

There are two areas of undigested proposals that should not be included in these documents.

1. The draft strategy for Woden Change Areas with maps showing areas for investigation, and the transect model. The areas for investigation in Curtin and North Woden are surely fictional, fantastically removed from even a cursory look at the actual ground truth even

before the points of view of current developments and community values are considered. There is no local centre where shown at 83 Theodore St (Daana restaurant – a lonely CZ4 block does not constitute a local centre). There is no room for edge streets to be laid on the ground. There is no place to insert ‘walkable grid’ cross-connecting paths onto existing residential blocks, and any attempt to redraw block boundaries has been anathema to EPSDD. Only the blue-green network is feasible, and the other proposals on the same map are already fighting it. The blue-green network must be extended further northwards along Yarralumla creek on both sides, including the former horse paddocks area, to increase its function as a wildlife corridor as well as a human corridor.

2. The attempt to transplant a descriptive urban planning descriptive theory of transects into a prescriptive model applied to a situation with very different landscape, history and economics is laughable. It has no place in the ACT territory plan until extensive critical reviews of the model and its effectiveness are applied to ACT planning.

Transport planning must be integrated with development planning, not treated separately. The North Curtin horse paddocks area residential development will require connections of roads into Curtin, and access connections to light rail and bus connections, to be planned and provided in advance. The ACT component of the residential development along Yarra Glen must not prevent construction of an exit up-ramp from Yarra Glen northwards to Cotter Rd (needed to reduce rat running through Curtin streets) and the additional down-ramp needed from Cotter Rd southward on Yarra Glen towards Woden.



## Submission Regarding Draft District Strategy Inner South 2022

1. I find this document verbose and confusing to read. I can't see the vision.
2. The plan for the area in which I live, Red Hill, seems to be one of finding a school or shops and intensifying the population in an adhoc fashion adjacent to it (see Astrolabe Street and Cygnet Crescent). Where is consideration for the character of the suburb let alone your 5 Big Drivers? On page 128 you provide examples of transect zones and the examples from Miami and Missing Middle Housing which show thoughtful consideration of the locality, not tossing in 6 stories beside and overshadowing suburban houses. Have you been along Astrolabe Street at school drop-off or pick up times which extend well into peak hour with before-school and after-school care? A narrow suburban street is already beyond its designed capacity with no room for expansion yet your vision is to make the situation worse.
3. At one stage the yellow area marked to the south of the Red Hill Shops is designated General Urban and at other times that area is designated "Future Investigation Area" yet on the map they look to be identical sites. How can I comment on your vision when I can't figure out what the vision entails?
4. There is a disconnect between "What the Community Told Us" and what is proposed in this document. On p5 the Minister said "I am eager to see the valued character of our districts supported ...". Where in your document is the valued character of any of the districts and how does your vision support that character? I couldn't find it.
5. In 2018 you published the Red Hill Precinct Map and Code. As a resident who was involved in the community consultation, I was led to believe this would be the extent of development in and around Red Hill shops. The Code states clearly the maximum height and number of stories of dwellings within the Precinct, yet your Figure 36 shows this area coloured as an Urban Centre with development of 6 stories, far exceeding the Code. It also looks like what was designated as open space in the Code is going to be built upon. Construction on the site hasn't even been completed and yet already it looks like you intend to add even more buildings and larger ones at that.
6. Most of the streets in Red Hill that you have coloured yellow for "Future Investigation Areas" are narrow suburban streets. There is not room for intensification in this area if you want to meet community expectations and your own liveability objectives.

## Comments on the draft Territory Plan and Woden District Strategy

### Draft Territory Plan

**Subdivision of residential blocks:** I very much favour permitting the subdivision of blocks in RZ1. The current restrictions have contributed to our absurdly high house prices in the ACT and the shortage of town houses and cottage style housing especially suitable for single and older people. However, it is critical that subdivision not jeopardise the existing character of established suburbs or result in a loss of tree/garden cover by way of overbuilding on the block (as has happened with Fluffy blocks). I would recommend therefore a minimum block size after subdivision of 350m<sup>2</sup> with 40% of each block to be soft planting areas. If a larger home was desired a second storey would be required.

**Community Housing:** I support the proposal that community housing (affordable rental that cannot be separately titled) be added as a use in community facility zone areas. Community housing in CFZ is proposed to be limited to where it is associated with social housing or a place of worship. Currently too much land held by churches and clubs is underutilised at a time when more affordable rental housing is desperately needed. This change should encourage the building of more of this type of housing.

Complementing the above, I support **reducing the vehicle parking requirements for community housing** especially near public transport corridors. Tenants in this type of housing are less likely to rely on travel by car. Reduced parking requirements would cut development costs thus enhance the likelihood of investment in this type of housing attaining financial viability.

### Woden District Strategy

I strongly support **the Yarralumla Creek corridor** being designated as a primary connection in Canberra's blue-green network. The Creek and its surrounding area are important to the community for recreation, active travel and reducing urban heat while there is much potential to improve the area in the way the natural environment along Sullivans Creek has been restored in North Canberra.

Given the importance of the blue-green strategy in the draft plan and the Woden district strategy, I was surprised that an idea should be floated for the **Curtin edge north and south** (the parts of Curtin closer to Yarra Glen) of a 'new edge street' through the Yarralumla Creek corridor, supposedly 'to clarify the urban edge to Yarra Glen'. This would involve the loss of a very large area of the current corridor together with many trees. I oppose the suggestion very strongly.

Whether Woden gets a tram (which I do not support, not least because notwithstanding its likely stupendous cost the public has not yet seen a sensible cost-benefit analysis) or a rapid bus connection on Yarra Glen at Carruthers St, it would make sense to see more dense housing along the eastern edge of Curtin. If we consider the housing on the eastern side of Allan Street which includes a line of battle-axe blocks facing the park, 3 storey development here should not require a new road. The battle-axe blocks each have wide access lanes (serving 2 houses) while there are several cul-de-sacs that could also aid access. Developers might need to buy several houses to make development worthwhile but over time this is sure to occur.

While opposed to a new road, the idea of a **bridge for pedestrians and cyclists over Yarralumla Creek** is supported as it would connect the new residential area in the former horse paddocks with the rest of Curtin and its active travel routes. It would also open the north side of the Creek to community recreational use.

The strategy canvasses the possibility of community, retail and other development in and around the **large roundabout at the intersection of Yarra Glen, Yamba Drive and Melrose Drive**. So long as the flood risk is understood and allowed for there is potential for better use of this land. However, it would be critical that much of the present space is retained for more intensive tree planting and for recreation use.

**Woden's pool at Phillip** should remain a 50m pool with outdoor areas and a shallow pool for children. A 25m pool as is proposed with no doubt much reduced outdoor areas would be a poor outcome. Given that the district plan assumes substantial growth in the population around the Woden town centre it makes good sense to retain and improve the pool. Woden has lost too many community facilities already.

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.

Where is the analysis of Mobility-as-a-Service, the future of public transport infrastructure? The blind application of light rail is lazy, poor quality public policy and shows a fundamental ignorance of emerging technology.

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.

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I am also concerned at the loss of tree canopy, which is an inevitable outcome of infill, urbanisation and light rail. The destruction of green canopy shows a complete disregard to the effect of climate change. The proposal would start to transform the inner south from an area of good green coverage to a heat sink. It is unconscionable public policy and speaks to developer greed, not citizen amenity or environmental needs.

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?

[REDACTED]

[REDACTED]

[REDACTED]

### **Comment on the Draft Inner North and City District Strategy and the Draft Territory Plan DS3: Inner North and City**

The Strategy recognises the value and contribution of heritage and states it is a key consideration in any future redevelopment. The Garden City precincts are mentioned under the “blue-green network”, however the attendant buildings and their backyard settings are not. Without significantly stronger planning controls within these heritage precincts, the coveted Garden City feel will be completely diminished. As a homeowner and resident of the Wakefield Gardens Precinct, I have witnessed a dramatic diminishment of heritage values due to house extensions and existing building changes in the last 10 years. In the majority of cases, heritage precinct guidelines are not being observed, with unsympathetic construction being clearly visible from the street, or built to the side of the existing buildings. Moreover, extensions tend to be dwarf existing buildings in floor area and height, and have made an enduring negative impact on the Garden City values. I have raised my concerns with the Heritage Unit and the Minister for Heritage and was advised that no ground monitoring or compliance checking was undertaken on heritage values across the precincts, and there was no resourcing to undertake this anyway. This seems an untenable situation, significantly negatively affecting the future of the heritage suburbs. If the Strategy is to be genuine in its stated objectives to conserve heritage, strengthening planning controls within heritage precincts together with adequate resourcing of the Heritage Unit to permit monitoring and compliance needs to be made a priority.

This intensity of building construction also has significantly reduced green space within these Garden City precincts. Green space is noted as a consideration in the strategy, but its conflict with building development within the precincts is not.

These concerns also relate to any rezoning being considered under the Draft Territory Plan. I note that the Inner North and City District is flagged for potential greater housing density. If heritage values are to be genuinely conserved, then the heritage precincts must be excluded from this zoning change.

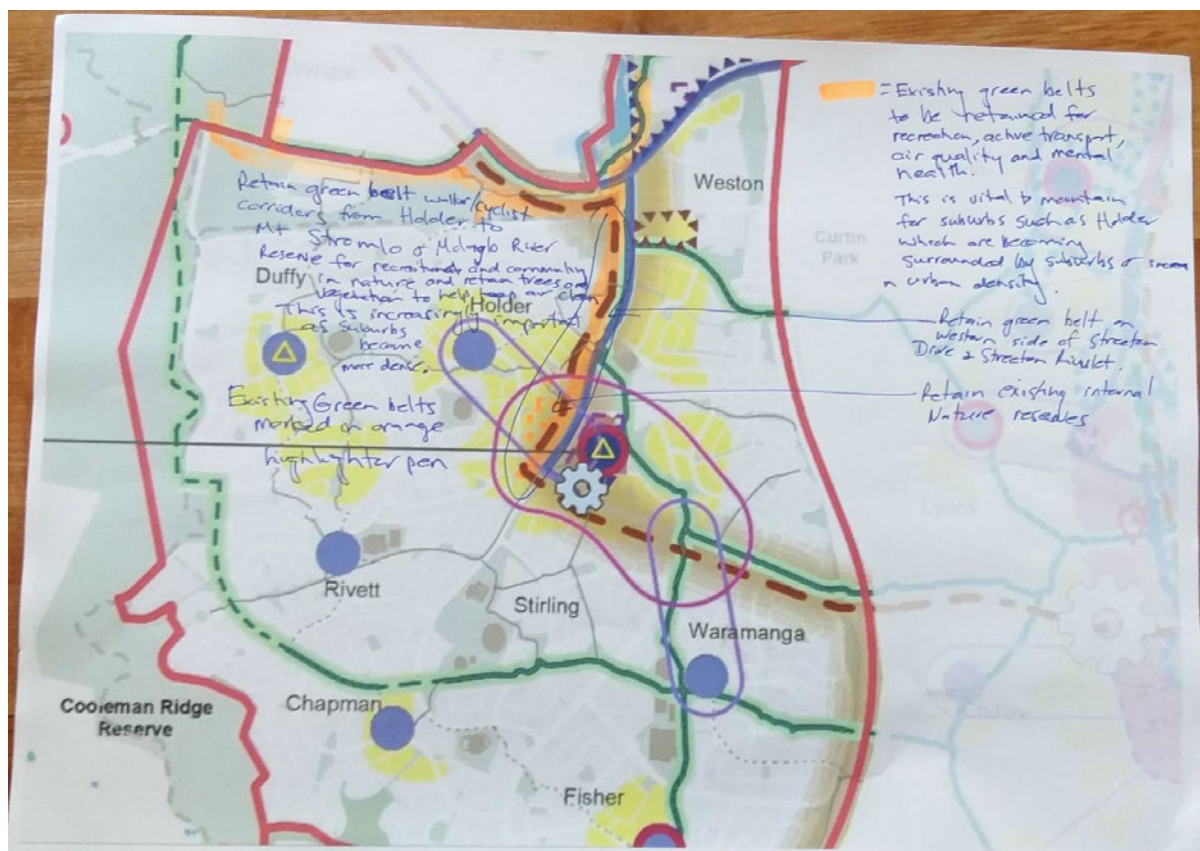
## Public Submission on Weston Creek and Molonglo District Plans

See annotated maps and photo below for specific changes to the draft plans.

### Summary

- **Urban infill needs to come with increased access to quality natural spaces**, such as quality green belts around and within suburbs so people can go for at least 45 minute walks in nature etc. Green spaces need to be within built up areas, not just on the periphery. This is both for health, quality of life, mental health, air quality, heat control etc. These green corridors should link to reserves.
- The Strategic Investigation Corridor and Future Investigation Zones in the draft Weston Creek and Molonglo District Plans take away the current natural spaces raised in dot point one as being important. See photo below for an example of such a place.
- **Retain the natural green corridors marked in the maps below.**
- **Remove existing internal Nature Reserves from Strategic Investigation Corridor and Future Investigation Zones ie the reserve at 4 Foxall Place Holder.**
- **Do not build on ridge tops.** Keeping hill tops green create more liveable and aesthetically pleasing cities.
- **Remove the areas marked in orange in the maps below form Sustainable Neighbourhood Area and Corridor and Future Investigation Zones and turn southern part of development near the Arboretum into a Canberra Nature Park/Reserve to compensate for increased development and densification.**
- **Keep green walkable corridor between Holder and Molonglo Reserve.**
- **Protect homes from poor air quality from major roads ie Streeton drive. Keeping the green corridors as 'green lungs'.**

### Weston Creek – comments marked on map





## Molonglo – comments marked on map



Example of an existing beautiful walking trail in Holder zoned for Strategic Investigation Corridor and Future Investigation Zone – please remove this and existing reserves from such zoning.





# Alternative Proposal for Inner North Light Rail Route for Civic to Belconnen

## Overview

The **currently proposed Civic to Belconnen light rail route** through the Inner North (Northbourne Ave – Barry Drive – Belconnen Way) has a **number of drawbacks** and challenges. This document proposes an **alternative Inner North route** that addresses these **issues**. The route proposed follows **Northbourne Ave — Barry Drive — Belconnen Way**.

In summary this route:

- is a **similar length** to the current proposal **but simpler and cheaper to build**
- **reuses much more existing light rail infrastructure**
- is **surrounded by less reserve** meaning less impact on Canberra's natural environment
- is **surrounded by more higher density development** and **less low density residential housing, university/school zoning, and parkland**

The proposed routes are all illustrated below, followed by further supporting details.





## Detailed information

This section provides additional details on the proposed MacArthur Ave route versus Barry Dr route. **Measurement references** show values for proposed **MacArthur Ave route first**, **Barry Dr route second**.

### Overall route benefits

The proposed **MacArthur Ave route is simpler and straighter** than the Barry Dr route, while being a **similar total length (McA 10.4km vs 9.4km Barry)**. It also:

- **avoids difficult winding slopes and suspended roads**
- **has much more available space down the centre of existing roads to use**

### Reuse of existing infrastructure

The proposed **MacArthur Ave route leverages more of the existing light rail infrastructure (McA 2km vs 0.1km Barry)** than the Barry Dr route, thereby **shortening** the amount of **new track required (McA 2.6km vs 3.5km Barry)**.

### Existing corridor

The proposed **MacArthur Ave route is lined by significantly less reserve (McA 0.25km one side + 0.85km both sides, vs 1.95km both sides for Barry Dr)**, meaning **significantly less disruption** to the Inner North's – and broader Canberra's – **natural environment**.

The MacArthur Ave route is already lined by:

- more high density zoning and development on both sides (**McA 2.4km both sides vs 0.6km both sides Barry**), and
- less low density/designated areas both sides (**McA 1.3km both sides vs 1.5km effective both sides Barry**, spread out over a longer distance) – I would strongly argue not to touch this for either route.

Please accept this submission as feedback on the draft **Woden District Strategy**, based on the five drivers outlined in the document.

### **Blue-green network**

#### **I support;**

- the retention, restoration, protection and enhancement of Yarralumla Creek as part of the so-called blue green network;
- protection, retention and enhancement of connectivity corridors between urban parks, open space and nature reserves eg Red Hill, Oakey Hill, Mt Mugga, Mt Taylor and Farrer Ridge;
  - these reserves and their connectivity corridors must be preserved for all species, not just the threatened species, so they don't become threatened in the first place. All are part of Canberra Nature Park, and must never be developed;
  - Red Hill is threatened with development on a regular basis, despite being a known habitat for gang-gang cockatoos (Canberra's official faunal emblem), sugar gliders, and a wide variety of other fauna and flora;
  - enhanced linkages from Mt Taylor to Oakey Hill through Curtin Nature Park to Yarralumla Creek and Cotter Road grassland; and from Curtin Park to Hughes.
- maintaining and expanding urban tree canopy cover
  - the best way to achieve this goal is to not chop down any more existing trees and to plant more trees.
- I walk along the Yarralumla Creek most days, it's a pleasant walk through open space and trees. It would be a tragedy to lose this public amenity to development.

If the Covid pandemic has taught us anything, it is the crucial importance of open spaces within walking distance of all residences (house or flat) to be able to get out into the fresh air and go for a walk. This is critical for personal and community wellbeing.

When did Illoura Horse Paddocks change to Curtin Park? Does this mean the Illoura Horse Paddocks have gone, the horses moved out and the land will be handed over to developers (just like North Curtin Horse Paddocks)?

### **Economic access & opportunity across the city**

#### **I do not support;**

- any further development of Woden, whether as an educational, commercial or any other type of hub;
  - A recent population forecast predicted the population on the south side of the lake will decline significantly in the future, and newcomers to Canberra are refusing to cross the lake ('ACT forecast to swell to 784,000 people'; *The Canberra Times*, 24 February 2023), so why bother to further develop Woden if no one wants to live there?

- It's too late for Woden to be an employment hub, as the Federal government has progressively removed public servants from the area over the last decade or so.
- The Y plan (remember that?) was intended to provide employment in town centres for local residents, to avoid having to travel into Civic. If the ACT government wants to make Woden an employment hub again, it needs to negotiate with the Federal government to bring the public servants back.
- the CIT at Woden;
  - this was part of a land deal, giving the UNSW the CIT's site in Civic and moving the CIT to Woden. The UNSW has plenty of its own land in Sydney, it does not need more land in Canberra.
  - the shopping centre will be swamped with 6,500 students, and the usual shops will be replaced by the latest youth fad (anyone for bubble tea?), as has happened near the ANU. This will make shopping for the family groceries at Woden more difficult for local residents, and may be intimidating to some older or less mobile residents, just as gangs of local youths were at the (now demolished) bus interchange. In short, it will reduce liveability for Woden Walley residents.
- the development of Curtin & Mawson group centres for future employment and mixed-use development;
  - the Curtin shops have already been redeveloped (the first new shop opened in December, 2021). The outcome is a new block of shops replaced the old block of shops, with five storeys of flats built above the new shops;
  - the draft Curtin master plan (still a draft when the development was approved) specified a redevelopment height of two storeys of flats above the shops, yet the developers built five (against strong local opposition), proof that developers do what they want and get away with it, regardless of any planning rules;
  - the new restaurant has expanded from the building into Curtin Square, taking up a significant portion of the square which was previously available to all, and is now available only to restaurant patrons. There are now people drinking in the square, outside the restaurant area, particularly on weekends. Anywhere else, drinking in a public place would be banned;
  - the five storeys of flats above the shops are totally out of proportion to the rest of the square; it reminds me of a fairy-tale castle looming above the town, dark and brooding, with the castle's occupants staring down at the peasants below;
  - the local community fought long and hard against this development, and ultimately lost; the occupants of the (rental only) flats are temporary residents, with no attachment or sense of belonging to, let alone contributing to, the local community;
  - the same fate awaits Mawson; the community shops atmosphere will disappear, and yet more high-rise flats will be built above and around the shops.

## **Strategic movement to support city growth**

**I do not support** extension of light rail from Civic to Woden;

- the tram will double the travel time between Woden and Civic, hardly more efficient;
- local suburban buses will be cancelled, as happened in Gungahlin, resulting in longer journey times and multiple transfers;

- every tree along the tram line, from the Commonwealth Ave bridge to Woden, will be chopped down (as were all the trees on Northbourne Ave), including the near 100-year-old trees on Commonwealth Ave and the trees planted in the median strip on Adelaide Ave and Yarra Glen as part of deliberate landscaping when building the Woden Valley suburbs in the 1960s;
- the visual amenity of these main arterial roads will be destroyed;
  - a few token scraggly gum trees (eg Northbourne Ave again) planted along the tram tracks will not replace what was lost;
- the tram has nothing whatsoever to do with public transport, it's all a developer's free-for-all to build more high-rise blocks of flats along the tram line. The bush capital is slowly disappearing under concrete blocks a Soviet central planner would be proud of;
- if the ACT government really does want to improve public transport, **cancel the tram** from Civic to Woden and replace the diesel buses with **electric buses**. And bring back the **Expresso buses** for commuters at peak hours – fast, efficient transport from the suburbs into Civic at peak hours. Problem solved.
- active travel; this is just a buzz word much favoured by the ACT government. For the young and fit, it's just words. For the elderly, the mobility-impaired, pregnant women or mothers with babies and young children, it's an impossibility.
  - 1.2 kilometres to the nearest public transport stop is simply too far for some people.
  - families cannot drop off children at school or day care on a tram, a bus, a bicycle or a scooter.

Please explain the meaning of 'expand the micro-mobility network to the Woden district and other initiatives to facilitate an enhanced multi-modal network in line with the ACT Transport Strategy'

Or rewrite it in plain English.

Whatever it is, I **will not support** it until I know what it means.

Similarly, I **will not support** implementing upgrades to priority active travel routes, including Carruthers St, until I know what the upgrades are. Carruthers St is a residential street connecting the shops to the primary school, not a developer's freeway.

## **Sustainable neighbourhoods**

I do not **support**;

- suburban transformation and sustainable neighbourhoods between Curtin and Mawson,
  - this is just developer-speak for more badly-built, ugly, high-rise blocks of flats in suburban areas all the way along the tram line, cf Gungahlin;
  - the result will be less open green space, fewer trees (inconsistent with the ACT government's goal of 30% tree canopy) and more hard surfaces (think concrete, bitumen) contributing to an increased urban heat island effect and increased urban water runoff, affecting the quality of the waterways;

- urban infill;
  - ‘urban infill’ means single houses in low-density suburbs being replaced with blocks of flats (whatever they are called, eg duplexes, townhouses, apartments)
  - the result is the residents of these new flats will be peering down into the back yards of their neighbours (what about the neighbours’ privacy and amenity?), as is happening now in Torrens (‘Build now, ask later approach backfires for developer’; *The Canberra Times*, 27 February 2023);
  - housing choice will be reduced, as the only option will be to live in a tiny flat in a badly-built high-rise block of hundreds of flats;
  - modest family homes with mature gardens are already disappearing, to be replaced by McMansions that cover the entire block, or by flats; this trend will only accelerate;
  - urban infill reduces the local liveability of suburbs and neighbourhoods
- mixed-use development
  - mixed-use development is code for building flats above shops, cf Charles Dickens’ London of the 18<sup>th</sup> century, and Curtin shops in the 21<sup>st</sup> century see dot point under **Economic access and opportunity** above).
- increasing housing density around town, group and local centres
  - again, this means more blocks of high-rise flats around the shops
  - **Woden** already has 25 (or more) residential towers built or planned, containing about 10,000 residents; how many more do you need?
  - the residential towers have resulted in a considerable loss of amenity, including loss of open space, trees chopped down, loss of solar access to Woden Square and wind tunnels between buildings.
  - **Curtin** shops are ringed with land already zoned medium density; some years ago, there were 23, two and three storey blocks of flats around the shopping centre, along Carruthers and Strangways Sts, containing 264 flats. There would be more now, after the Mr Fluffy infill of two houses per block. Curtin does not need any more flats around the shops;
  - Curtin does not need any flats along Theodore St or Carruthers St, as appears to be indicated on the map at Figure 19, p. 59. These streets are a low-density residential area of separate houses with backyards for the children to play in, not high (or even) medium density areas for Soviet-style blocks of flats.
    - There are already blocks of one and two storeys, containing 41 flats, on Theodore St near Curtin Primary School.
- densification or subdivision of blocks in areas zoned residential, unless minimum standards are met (see dot point below under I support);

Does the ACT government consider the Woden Valley suburbs are not currently sustainable? This statement is an insult to Woden Valley residents who have built strong communities over the past 60-odd years (Woden Valley celebrated its 60<sup>th</sup> anniversary in October 2022).

### **I support;**

- preserving land for future social and community uses, as long as developers can never develop on the preserved land.
  - developers have already built or are planning to build on public parks and reserves, eg in Chapman, Ainslie, Dickson and Kippax.

- just because a particular block of land is identified for community use does not mean it is safe from developers.
- local-scale projects to support active streets celebrating existing leafy areas and local centres;
  - best way to do this is to not chop down existing trees (eg along Yarra Glen and on the horse paddocks), plant more trees and fix broken and uneven footpaths and cycle paths.
  - how is a street 'active'? what is an inactive street?
- development precincts achieving improved tree canopy cover, permeability and urban heat outcomes.
  - as if! we can dream, can't we? never seen a block of flats yet that does this.
- existing local public open space must be maintained and not developed; ideally, local public open space needs to be increased, for personal health, community and visual amenity and wellbeing.
- minimum standards for new buildings in areas zoned low-density residential must be complied with;
  - minimum block size after subdivision of 400 sq m;
  - maximum height limit of two storeys; (Canberrans have the biggest houses in Australia, apparently)
  - 40% of each block to be soft planting (to avoid McMansions built fence to fence);
  - 30% tree canopy cover on each block (avoids chopping down every tree to build said McMansion)

## **Inclusive centres and communities**

### **I do not support;**

- group and local centres for any further improvement initiatives, with **one exception (new community facilities)**.
  - Curtin (group centre) has already been 'improved', see dot points under **Economic access and opportunity** above.
  - rezoning Daana restaurant as a local centre
    - it's just one building, too small for any more shops and car parks;
    - there was a convenience shop there years ago, it went broke due to the proximity of Curtin shops and Coles (been a restaurant ever since)
  - Lyons shops (local centre) are too small to squeeze in any more development, and definitely too small to build for flats above the shops (cf Curtin).
    - the current Lyons shops already suffer from their proximity to Woden, with small businesses progressively closing over the past few years.

### **I do support** new community facilities in town, group and local centres;

- group and local centres need meeting places, at the very least, rooms for gatherings of up to say, 100 people, eg community centres at Hughes and Cook;
- **Curtin** needs a meeting place; the only hall suitable is at the Uniting Church, and it is always booked out;
  - Here's a thought; use Daana for a community meeting room?

- these facilities need to be available at no or very low cost to volunteer and community groups, small organisations and sports/cultural groups (eg martial arts, dance classes);
- such meeting places would contribute to community engagement and improve the wellbeing of local residents;
- it needs to be a condition of new developments that such facilities be included;
  - this was a lost opportunity in Curtin, the developer refused to include a community meeting room in the new shops, although it was suggested during the consultation phase;
- **Woden** has lost many community and recreational facilities in recent years due to development and ACT government neglect, and is about to lose the ice rink (to Tuggeranong) and the swimming pool (recently sold to a developer).
- community and recreation facilities required in Woden include (but not limited to); community centre; arts centre (or similar cultural centre); small theatre; sports facilities, both indoor and outdoor; keep the pool & rebuild as aquatic centre (with 50 m pool) when the ice rink goes; Phillip Oval open to all (currently fenced, gated and locked, can't even walk the dog there).
- such facilities increase the local liveability of the area, improve amenity for residents and contribute substantially to personal and community wellbeing.
- Woden also needs a **walk -in medical centre**;
  - there isn't one in Woden, presumably because the hospital is located here, but;
  - during the pandemic sick people were discouraged from attending the hospital with minor illnesses and injuries, and encouraged to go to a GP instead.
  - it is difficult to get an appointment with a GP (or the patient waits for days for one) and there are very few GPs who bulk bill.

### **Where are the extra schools?**

- no mention of new or expanded existing schools in the draft strategy, despite all the new blocks of flats going up everywhere, and thousands of extra residents;
  - except just one-line about upgrades to Garran Primary school, but an upgrade is not an expansion;
- the two schools in Curtin are already full, with Holy Trinity already relying on demountables (that don't look temporary);
- the primary schools in/near Curtin, Woden and Mawson will need to be expanded (that's every primary school in the Woden Valley);
- the two high schools (Alfred Deakin and Melrose) and Canberra College will need to be expanded.

### **Future possibilities for the light rail corridor**

**I do not support** revitalising Yarra Glen, north Curtin and Curtin via light rail stops

- what is a 'new urban community adjacent to Yarra Glen'? sounds like blocks of flats built on current open green space;
- what happened to preserving open green space along Yarralumla Creek under the blue-green network? That includes the open space between the creek and the road.
- No! Yarra Glen will look Gungahlin, just a main arterial road lined with blocks of flats.

- And even more open green space and trees will be lost to developers.
- even worse, what is a ‘vibrant new urban mixed-use strip and community’ within 5 minutes’ walk of the stop’?
- more flats! more flats on top of shops! (see dot point on mixed-use development under **Sustainable neighbourhoods** above)
- where are the tram stops? Has the design already been done and the ACT government hasn’t told us? These new urban utopias may be 5 minutes’ walk from the tram stop, but how far is the tram stop from the shops, or from the far side of Curtin?
  - And before you say ‘active travel’ see that very dot point under **Strategic movement to support city growth** above.

**I do not support** unlocking potential at the gateway to Woden town centre

- The proposal to reconfigure the roundabout and build an expanded urban community (more flats?) on the ‘road reserve’ is madness.
- The so-called road reserve is a **flood buffer zone**. It is there because there was a fatal flash flood along Yarralumla Creek at that very spot point on Australia Day, 1971, in which seven children and young people died (the oldest was just 21). The roundabout and the approaching roads were subsequently rebuilt above the creek’s flood plain to prevent such a disaster ever happening again.
- The flood remains the worst civilian disaster in Canberra to date. A flood memorial was erected on the nearby road reserve nearby many years later. Are you going to build over that, too?
- Do not make the potentially fatal mistake of thinking such a flood won’t happen again. It can, and it will.
  - I support ongoing works to reduce the risk of flash flooding around Woden and Mawson (one of the young people was drowned near Mawson), but the draft strategy does not state what these works are or when they will be carried out.

**I support** a re-imagined Yarralumla Creek

- Provided the proposed continuous landscape features, improved public access, landscape amenity, habitat opportunities and water quality improvements actually happen (but no more swamps, sorry rain gardens, they are weed-infested holes in the ground);
- I will definitely support this proposal as long as it means that the North Curtin horse paddocks (through which the creek flows) will not be developed

**I don’t know** if I support the development of the Athllon Drive corridor or not, as I do not understand the proposal.

- What is ‘a multi-modal transport corridor and urban boulevard’?
  - This meaningless nonsense sounds like something straight from *Utopia*.
  - If you want people to support these proposals, you could at least explain them in plain English.
- if it means turning Athllon Drive into something like the old Northbourne Ave, with lovely big trees down the median strip, yes I support it.



- if it means turning Athllon Drive into something like the current Flemington Road, lined with blocks of flats, then I don't support it.

## **Former North Curtin Horse Paddocks**

### **I do not support development on the former North Curtin Horse Paddocks**

- the horse paddocks are part of the blue-green network along Yarralumla Creek. Following the secret land swap deal that gave away this green open space to developers, it needs to be preserved, as proposed under Re-imagined Yarralumla Creek (see dot point under **Future possibilities for the light rail corridor**, above)
- the North Curtin Horse paddocks was used as a builders' rubbish dump while the Woden Valley suburbs were being built, and almost certainly contains asbestos.
- the paddocks provide a wildlife habitat, home to the threatened golden sun moth and to more than 170 species of birds, as well as kangaroos, reptiles and countless insects. They also form part of an important corridor for migratory birds.
- building on the paddocks will result in a massive loss of trees and vegetation, a significant loss of visual and public amenity and contribute to the urban heat island effect and poor water quality due to urban runoff directly into Yarralumla Creek.
- I have no confidence that development along the Yarra Glen side of the horse paddocks will 'contribute to a positive built frontage' (what could be more positive than trees and green space?), or that any of the wonderful facilities outlined on p. 120 will actually be built
- from the (very small) diagram, figure 38, it appears road access will be from Cotter Road and Yarra Glen near the Mint (new overpass?), which will massively increase peak hour traffic congestion on those two main roads. Or will all the new residents scoot to work?
- surely there is no need for new 'edge streets' to 'clarify the urban edge'. Does the ACT government think the Canberra population can't tell the difference between where the undeveloped land stops and the developed begins?
- 

## **Curtin edge north and south**

### **I do not support development of the so-called Curtin edge north and south**

- isn't all the wonderful things outlined on p. 121 a repetition of the developer's lies for the horse paddocks? If you can repeat it, so can I.
- I have no confidence that development along the Curtin edge north and south will 'contribute to a positive built frontage', or that any of the wonderful facilities outlined on p. 121 will actually be built
- I have even less confidence the developer will 'consider a biodiversity sensitive urban interface (what is this?), protecting a potentially re-naturalised creek (is it to be re-naturalised or not?) corridor from impacts of urbanisation (how?)'.

- Where are the light rail stops that this urban utopia supposedly has access to and oversight of (do they supervise it?)? They are not marked on Figure 39.
- the proposal indicates there will be a net loss of trees, with all chopped down but only a few replaced here and there.
- **this net loss of trees is inconsistent with the proposed blue-green network and the 30% tree canopy cover, contributes to the heat island effect, etc.**
- trust me, Woden Valley residents can spot the edge of Yarra Glen. It's where the road ends and the buildings begin.
- buildings with a 3 storey height limit? Tell the Town Planner he's dreaming. The flats at the Curtin shops were supposed to be two storeys, but ended up five storeys high (2.5 times more). At a proposed three storeys, that means the high-rises along Yarra Glen will be 7-8 storeys high.
- with the only road access appearing to be through existing Curtin streets, traffic will be more of a nightmare than it already is; it takes about 10 minutes to exit Theodore St onto Carruthers St at school o'clock in the morning.
- is that a road bridge across the creek to the horse paddocks, and another road along the southern side of the creek? That's a massive piece of infrastructure in the blue-green network and landscapes along Yarralumla Creek.
  - an acceptable alternative is a footbridge, similar to the footbridge further upstream near the roundabout, which would encourage active travel;
  - and a cycle path instead of a road along the creek, but there's one there already.
- DO NOT BUILD along the creek on the south edge, it is a flood buffer zone where seven people died in 1971 (see dot points under Unlocking potential at the gateway to Woden town centre, above)
- the open space along the creek between Champ Place and Whyte Place was a builders' rubbish dump while Curtin was being built in the 1960s. It contains asbestos.

## Woden North

### I do not support development of Woden North

- Blah blah blah, same old, same old, p. 122
- is the tram really going to cut right through the middle of the roundabout? How will it cross Yarralumla Creek? There does not appear to be a bridge marked on Figure 40.
- please tell the author that tram tracks do not a boulevard make.
- nice of the developer to acknowledge 'biodiversity values (whatever they are) and 'give consideration to wildlife friendly crossings' (what wildlife? dogs and cats?), without actually doing anything about it.
- yes, we can tell the edge of the street and where the tram tracks are, I mean the boulevard;
- the truth emerges, the purpose of the tram is to 'unlock sites for development'. Who would have guessed.

- from the map, it appears the community and retail facilities are to be built on the flood plain. DO NOT BUILD on the flood plain, it floods and people die (see dot points under Curtin edge and Unlocking potential at the gateway to Woden town centre, above)
- new blue streets are marked on the map, in what looks like Curtin along the cycle path and Hughes. There are already streets there, we don't need any more, thanks. The people who live there can already identify their own streets.
- seriously, any new blocks of flats in this area will block the view to the hills from the current residents, destroying their current amenity. The views have already been significantly reduced by the current high-rise blocks in Woden.

### **Woden town centre**

#### **I do not support any more development at Woden town centre**

- It's already had enough development; as a result it is very difficult to access and move around
- Why should all future development face Callam St? Is it north-facing? If not, that entire area will be cold and in shadow in winter.
- What are stabling facilities? Not too many people ride their horses to Woden.
- Where are the new city parks, with all their extra trees, going to be located? Woden is currently one big concrete mess, with most of the surrounding trees already chopped down (eg for the new bus stop)

The district plan for Woden is economic, environmental and planning vandalism.

The plan will destroy the character, heritage, biodiversity, and amenity of Curtin – a suburb prized for its green corridors and advanced planning principles, and similar nearby suburbs such as Hughes and Yarralumla.

Let's be clear, this 'plan' is about raising stamp duty for an obscenely expensive toy train to nowhere. It has already been well-established that the embodied carbon and environmental impacts of light rail construction, to say nothing of it's inflexibility as a form of transport that can only run along major arterial corridors, make it far less environmentally friendly or economically efficient than electric buses or trackless rail. There are currently zero attractions, residences and very few workplaces that run along the major road corridors between the Parliamentary triangle and Woden. Few people are prepared to patronise a public transport system that involves a 15-20 minute walk to access, as would be the case for over three-quarters of the residents of Curtin for example, assuming that transport actually takes them to their desired location. When the ACT government is running a 3<sup>rd</sup> world health system, there is simply no case – environmental, economic or in terms of demand-side public transport – for this absurd vanity project that we have now learned the entire appearance and functioning of Canberra will be trashed for.

Unsurprisingly given their already appalling track record in integrated urban planning (Coombs anyone?), the 'vision' to triple the population of Curtin conveniently ignores the extraordinary flow-on impacts on infrastructure, services, schools and childcare facilities (already full or over capacity), road traffic, safety and the environment. If Forest is anything to go, Curtin school playground will be adorned with a caravan of permanent demountables due to the 'unforeseen' increase in school enrolments caused by a tripling of residents.

Pouring concrete on every inch of Woden and the construction and embodied carbon of light rail are in direct conflict with ACT climate and biodiversity policies, carbon targets and will deliver a hotter, uglier, less liveable Woden.

Removing the need to consult with the community about planning decisions is more than just overreach by an arrogant, out of touch government, it is fundamentally undemocratic.

The proposed Territory Plan is a connivance between the Government and developers presented as a slick marketing campaign to pitch it as benefiting Canberra and its residents. In reality, it is designed to:

- increase the power of the government and developers at the expenses of residents
- entrench the mutually beneficial financial relationship between the government and developers at the expense of residents
- deliver on a government pre-determined, self-serving government view that has nothing to do with the representing the views of ratepayers
- reduce what little integrity, transparency and accountability there is in the existing system even further so that the residents stand no chance in having their views taken into account
- further marginalise residents in the planning process so that the views and incomes of the government and developers prevail no matter how objectionable the proposed development, i.e., the current 'system' which already pays little more than lip service to genuine consultation will be reduced even further
- further reduce existing rules protecting heritage, streetscapes, amenity and the environment to the detriment of residents and the environment including waterways and wildlife habitat
- enable developers to exploit the plot size, the character of the neighbourhoods and the environment to the maximum extent possible with total abandonment of integrity and responsibility and total focus on destruction and profit
- allow the Government to benefit financially from the increased taxes associated with the developments, although we will not see this translate into better amenity and service provision in our city unless it accords with other pre-determined, self-serving government views
- allow the Government is focus on its priorities rather than the priorities of the residents it is supposed to represent, such as light rail at the expense (financial and otherwise) of other practical, economically-viable, environmentally-sensitive, heritage-sensitive and community-supported projects, or even basic infrastructure responsibilities maintaining the quality and safety of our roads.

In short the proposed Territory Plan is:

- doubling down on everything residents don't like about the current planning 'system'
- going to facilitate irreversible social and environmental harm
- further evidence that this Government which only exists through an unholy alliance with Greens who sold out the environment for power, is more interested in autocratically imposing its views than democratically consulting with and representing the people.

I wish to lodge a protest at the proposed change in zoning in Reid.

In particular, the allowing of six-storey and three-storey buildings in Amaroo Street, Reid will be deleterious to the heritage feel of the suburb, which is itself protected under heritage planning laws.

Allowing the change will only give a green light to further encroachments in the future that will, bit by bit, destroy the unique value of this garden suburb so close to the centre of the city. Its specialness will only become plainer as the decades go on.

Reid is only a small suburb so any change in zoning will affect it disproportionately. The probability of damaging the suburb is high, and those of us who live in the suburb pay very high rates for the privilege.

Maintain the suburb as it is! It needs to be cherished. This involves commitment on the part of government.

HaveMySay	Summary document	My feedback - NOEL BONIFACE, resident of Pearce
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5 Big drivers	Directions for Woden	Feedback - HaveMySay
1) Blue-green network	<ul style="list-style-type: none"> <li>Protect and enhance habitat for threatened species and their connectivity with green corridors and nature reserves including Mount Mugga, Oakey Hill, Red Hill, Mount Taylor and Farrer Ridge.</li> <li>Explore opportunities to restore natural environments along Yarralumla Creek as part of an enhanced blue-green connection including potential for wetlands</li> </ul>	<p>I support this direction</p> <p>I support this direction</p>
2) access and opportunity across the city	<ul style="list-style-type: none"> <li>Develop Woden town centre as an educational and commercial hub, building on Canberra Institute of Technology and the transformational potential of the future light rail connectivity.</li> <li>Develop the economic and employment roles of Curtin and Mawson group centres with their improved connectivity to the future light rail corridor.</li> </ul>	<p>Direction lacks inclusion and consideration of the Hospital and potential of the surrounding health precinct</p> <p>Direction is missing fast tracking development of community facilities to address the current deficit in facilities necessary to support the all season / indoor sporting and social needs of the Woden Valley</p> <p>Light rail will not be transformational, the existing Rapid Routes provide very good connectivity and can adapt to the growing needs however they develop in the short to medium future.</p> <p>Curtin group centre is too far from future light rail corridor, the rapid bus routes augmented by suburban bus network can be enhanced as demand grows</p>
3) Strategic movement to support city growth	<ul style="list-style-type: none"> <li>Plan for and deliver light rail from the City Centre to Woden, as the central spine of the public transport network in south Canberra.</li> </ul>	<p>The existing Rapid Bus Route already provides centre spine to public transport</p> <p>Electric Buses are a preferred sustainable solution because of their flexibility to travel off route</p>
4) Sustainable neighbourhoods	<ul style="list-style-type: none"> <li>Deliver urban transformation and support new sustainable communities linked to the future light rail corridor between Curtin and Mawson.</li> </ul>	<p>Sustainable includes being LIVEABLE providing amenity for ages in the local community.</p> <p>Draft is missing the direction of addressing the deficit in local indoor sporting and social facilities.</p> <p>I don't accept that the introduction of light rail is necessary in the short to medium term. Surely Transport Canberra has the professional ability to work out how to enhance the existing bus services to provide the desired connectivity and efficiencies.</p>
5) Inclusive centres and communities	<ul style="list-style-type: none"> <li>Consider the role and function of existing group and local centres which may include Curtin, Lyons, and Mawson, where required, undertake targeted initiatives to support centre vitality and community development.</li> <li>Deliver new community facilities aligned with urban improvement to address existing gaps in provision and support future residential growth.</li> </ul>	<p>I agree with this direction</p> <p>But please do not overlook the potential of local Torrens, Pearce and Farrer centres</p> <p>Amend to read : Deliver new community facilities aligned with addressing the pent up demand for indoor sporting and social activities and develop in parallel with future residential growth</p>

### **Planning Reform Process Submission - 3 March 2023**

The Planning Bill and Planning reform and consultation is a time-consuming disingenuous, and unduly cumbersome process and appears to seek to impose pre-determined outcome on the residents of the ACT.

The following initial thoughts occur:

- If existing residents think they should be concerned – they should be!
- If you think it's going to be bad – well it's going to be worse!
- The process further erodes trust in the planning system and overall Government intent.
- Get involved and understand the proposals and how they and potentially going to impact on you personally, your neighbourhood and your community.

### **Consultation Process**

The consultation process for the planning reforms and District Strategies has been an unnecessarily rushed and consequently flawed process that was undertaken over the Christmas and school holiday period. Only after interjection was the period extended from mid-February to 3 March. As a result, there has been limited ability and distribution of information for people to make adequate comment in a timely fashion.

The nature of the consultation to date, and the implications of the planning reform agenda have not been honestly presented to the people who most affected - namely the residents of the ACT.

This is a failure of planning where trust in the system is paramount for residents to feel comfortable and confident regarding the directions and decisions taken. People need to have faith in the planning authority to make the correct decisions. The planning directorate continues to disappoint in this regard.

The planning documentation provided is dense and difficult for the lay person to comprehend. The changes in the technical specifications are not described in a way which leads to easy comparison between the current rules and proposed new set. The lack of detail on 'outcomes-based' planning will lead to further uncertainty for residents and developers alike.

The consultation process is an impost on people who must go to a lot of trouble to review these documents, without any reference that their comments will be viewed, let alone carry any weight or contribute meaningfully to the process.

The proposed changes to the RZ1 zoning regulation seem to be 'Johnny-come-lately' and only appeared late through the consultation process, courtesy of certain lobby groups (who appear to be developers in sheep's-clothing) and the Canberra Times. This is not a recipe for effective planning or installing trust and integrity into the system.

As there is limited information available on RZ1/dual occupancy/conversion to RZ2 proposal, it is difficult to make meaningful comment, however well-intentioned the initiative may have been.

Generating interest in a process from which the impacts will profoundly affect people, is a major function of Government, and one that needs to be undertaken in good faith and with genuine intent. That is not the case with this process.

### **Justification for changes**

Little justification has been provided for the 70% infill target or any critical analysis undertaken as to whether this is the correct ratio of infill versus greenfield development. There have been no scenario



testing or options development undertaken as to what the pro's and con's of implementation of the policy as outlined (poorly) in the planning reforms and whether there are other alternatives or options that should be considered.

Other alternatives that should have been considered or given analysis include:

- expansion into the Kowen Plateau,
- expansion into lands purchased by the former LDA (properties such as Huntley),
- broader consideration for whole-sale relocation of the ACT border looking at 50-100 years of development (not limited to Ginninderry),
- provision for satellite settlements in adjoining regional NSW areas as joint ventures.

There has been no Social Impact Study (SIS) or analysis on existing residents as to the effects of doubling, tripling or greater densification of their neighbourhoods. There is no measure or attempt to quantify the effect on welfare, amenity loss and loss of urban greenspace and vegetation within the urban footprint as a consequence of these proposed changes.

There has been no Human Rights Statement prepared concerning the planning reforms. This would certainly be required where whole-sale changes to urban form and neighbourhood amenity is concerned. Residents may feel pressured to leave and sell their homes, with significant consequences to their well-being, mental health and ergo human rights. This appears to be a deliberate gap in the process.

The focus on 800m catchment around group centres for future development also lack justification other than for those area immediately adjacent and surrounding them (within walking distances). The idea that people would walk more than 15 minutes to the shops (Group Centre) for a general weekly shopping and push shopping carts back home regardless of cold, heat or rain is misguided. The relationship between residential location, car use and distance to group centres is not linear, if encouraging walking and limiting car use was the issue. The proposition could equally be applied to each bus stop. Or tram stop as is currently the intention for the Inner North District.

### **Affordability**

The issue of housing affordability is being used a 'trojan horse' and broad justification for the increased density provisions and change in housing form flagged in the planning reforms. Increasing supply of the termed 'missing middle' of town houses etc. will not improve affordability across the spectrum of housing choices, and perversely would actually increase prices for single dwelling homes in the ACT in most areas – as the supply of quality single dwelling homes actually decreases overall.

The following article spells out the complexities with using supply issues as a justification for proposed whole-sale changes to housing form.

'Developers act as though boosting housing supply is a panacea for our problems. The truth is much more complex and comes back to a harsh but unavoidable reality: profit-making developers aren't going to collapse the value of their product.'

<https://www.smh.com.au/national/nsw/why-solving-sydney-s-housing-crisis-is-more-complex-than-developers-will-admit-20230216-p5cl1l.html>

This undermines the entire basis for the planning changes if housing will in fact become more expensive overall in the ACT, regardless of planning policy.

### **The Elephant in the Room – Demolishing thousands of single dwelling homes**

The major non-discussed issue is the fact that under the planning reform proposals and District Strategies, eventually thousands of single dwellings in Belconnen and other Districts will be demolished to be rebuilt with new denser and more intensive dwelling types. These arrangements suit the Government with an increase in their rate base and of course developers, but not the residents who wish to stay in their neighbourhoods in their existing homes.

The implications of this for this are huge and are little recognised by the residents and populace in general. These planning reform issues are not of immediate concern and families and residents have other daily priorities rather than commenting on prospective changes that they may perceive as not impacting on them.

This fact has not been made clear through the consultation process, although that is certainly the intention of the Chief Minister, who wishes to see a general doubling of density and certainly much greater increases in urban intensification throughout the Territory. This is hardly the 'gentle urbanism' that the Chief Minister purports should occur.

This planning process will not only create confusion but stress and mental anxiety for large number of existing residents who wish to remain in their homes across the territory, with no definitive information on how the impacts will be mitigated and what timetable will be installed.

### **Generating Uncertainty**

This now creates uncertainty in terms of investment for both developers and existing residents. Residents are faced with regular investment decision that require some certainty that they will continue to be able to live in their home for several years to make those investments pay for themselves.

This includes:

- electrification and conversion from gas and fossil fuel dependence,
- solar panel and battery installation, heat pump and air conditioning installation,
- EV vehicle charging conversion,
- landscaping and garden establishment,
- large scale renovations, maintenance and updating,
- other large investment decisions

The proposed planning reforms can perversely work at odds with other Government policies on the above and other intentions.

The process is likely to create 'stranded assets' for those houses which for whatever reason are not suitable or sold to adjoining properties as part of development. They be surrounded on many sides by developments and unable to sell at market value due to devaluation.

There is no mechanism described for governance of the processes of conversion from low to medium and high density, in terms of protections for existing homeowners who wish to continue to reside in change-areas or sell and move on. It is anticipated that this regime will be 'left to the market', however this could result in unintended consequence – such as developer coercion and collective and coordinated real-estate and developer actions which leave residents with little choice. This is already occurring, and the stress for home-owners will increase under this scenario.

It is not a pleasant way to live, waiting for the next sale or neighbouring developer application to decide whether to move or remain. This would be a constant and almost daily concern in RZ2 and RZ3 areas.

### **Lack of a suitable Review Process**

There has been no independent review process (to my knowledge) undertaken examining the current existing built form from neighbourhood character perspective and newer developments over the past 20 or so years, to determine and inform the planning reform process as to what has worked from amenity viewpoint and what has abjectly failed. Improvements to the system through adaptation and learning from past mistakes then will not and cannot occur. There would be hundreds of examples to choose from, and community councils and other concerned citizens could ably assist the Planning Directorate in determining the best pathways for improvements. If these reports do exist, they should be made public, and demonstrated how they have been incorporated into the planning reform processes.

The planning documentation and particularly district strategies appear to be prepared by external consultants with an overarching brief to try and make densification/intensification as attractive as possible. This process of densification is really urban intensification and the justification for this is sorely lacking in any of the documentation (other than the assumed political intent).

### **The District Strategy Documents**

The District Strategies appear to be prepared by consultants or others outside of the ACT Planning Directorate with over-riding instructions to deliver a particular set of outcomes. These consultants are not even from the Canberra area and it appears they have not actually visited any of the areas they are suggesting for future change. Quite a situation for the Planning Directorate to promote, where they didn't even do the work!

The map quality is poor and requires magnification to be able to understand/interpret and analyse the planning reform proposals. Other graphics seem to be little better than scratchings on maps which are incredibly difficult to read and interpret and they bear little association with reality or some of the issues.

As an example some of the proposed travel routes for 'green' travel options have not considered the terrain and existing access options. The area between Kaleen/Giralang has been shown as a prospective access route from Crace – however this involves traversing steep embankments and area across the Barton Highway, Spigl St and down a staircase down Barwon St. On the surface, this seems merely an idea without any ground truthing – see pictures below. Whilst the intention may be laudable, it does not give any faith that the other consideration regarding the determination of 'Sustainable neighbourhoods', urban core areas or further areas for investigation.





### **Lack of Overall Context in Multiple Development Applications**

There is a lack of context regarding consecutive and commensurate developments in neighbourhood areas. There is no recognition of the scale and type of developments, and the cumulative and commensurate impact on neighbours in terms of timing.

For example, in and around the Kaleen Group Centre, the former community leisure centre and club is to be redeveloped for large-scale high-density units. This results in a loss of community facilities which was part of the reason for the original zoning upgrades in the early 2000's. The Lawson North development is also in progress on current defence lands, to be handed over the ACT Government at a later date. With the amount of proposed development occurring in the next few years – no consideration has been given to delaying or forestalling other developments in the area to ease the burden of noise pollution, dust, parking, vehicle movements and general liveability during commensurate construction phases. This is an issue all over Canberra.

### **Lack of granularity in assessment**

There is no assessment of the inherent value of any houses within neighbourhoods. This is not restricted to heritage-type listings or building worthy or heritage listing, but to the broader area and context. As an example, simply because houses have been rezoned – a newly renovated home with a prospective life-span of 30-40 years would be demolished.

This is not environmentally or socially responsible or sound, and in fact is a perverse outcome. There is no mechanism within the proposed planning framework currently to address this or similar issues. As mentioned above, there is no consideration of context in the assessment of development applications – they are generally approved without consideration of cumulative or specific impacts on adjoining residents or the neighbourhood as a whole.

**Lack of incentives for recycling or repurposing materials or overall environmental assessment**

There is no reference to massive amount of waste to be generated from the demolishing hundreds to thousands of dwellings and what should be done to recycle, re-use or re-purpose the materials. Almost all will go to landfill or minor steel recycling. At least some materials – (wood from joists and trusses, large dimension timber, aluminium window frames and a range of other useful materials) should be recovered in some form. This issue is already current in the redevelopments to date.

The volume of waste material is likely to be enormous. This would be a key area for the ACT Greens to address and take further action.

The planning reforms also seem to be at odds, or at least not integrated with other Government policies (planning and other) such as DV306 and the preservation of urban vegetation which will become increasingly important as climate change progresses, and as we wish to avoid the urban heat island effect. There is a whole submission worth of information that would need to be considered, however there does not appear to be clear description of how this will be taken into account in the proposed planning reforms.

**Conclusion**

The proposed Planning reform process has a number of serious flaws and issues that need to be addressed before community and affected residents can draw any comfort from the process. It superficially appears to be a vehicle to give developers greater profitability and lessen planning regulations whilst greatly expanding opportunities for development in existing residential areas, regardless of the potential impacts.

The planning process and reforms should be postponed and taken to the next ACT election with a clear and transparent explanation and reasoned political debate so that the residents/voters of the ACT understand what is at stake.

A clear mandate for changes of this magnitude needs to be sought through a legitimate electoral process.

People should have a full understanding of the implications of the changes and what they mean for them personally, as well as their neighbourhoods and communities.



3 March 2023

### **Comment of the draft new Territory Plan**

Thankyou for the opportunity to comment.

We are residents of Turner, in an RZ3 area, with a long history of involvement in local planning issues.

We have had little time to review the extensive documents provided for consultation but are providing comment on a few specific issues. We have focussed on requirements for multi-unit housing.

#### ***Design Guides Not Available***

It is very difficult to assess the proposed changes to the Territory Plan without the referenced Design Guides being available. These documents will be critical to the outcomes-focussed approach proposed in the draft Territory Plan.

#### ***Dwelling replacement requirement and housing diversity***

We find it unreasonable to delete the dwelling replacement requirement in the draft Territory Plan without the referenced Housing Design Guide being available.

*The New Territory Plans Supporting Report – Consultation Version* says that ‘*The provisions relating to range of dwelling sizes/number of bedrooms adequately addresses this*’ (page 70). It appears that these ‘provisions’ are intended to be in the Housing Design Guide. Without the Design Guide it is impossible for us to know if, or to what extent, these ‘provisions’ will address the issue of housing diversity (including provision of housing appropriate to families) in new multi-unit development.

The housing replacement requirement has been effective in increasing the availability of family-appropriate housing in Turner, particularly in the Turner School area. Turner School is a large primary school with an integrated special-needs program.

Prior to introduction of this rule in 2013, family homes were being replace by new multi-unit developments comprising 1- or 2-bedrooms units. At this time, families were moving out of the area and driving back into Turner School. This represented a failure of the market to provide suitable accommodation for the Canberra community. This was driven by a large investor market with a preference for small, low cost units. Since 2013, the number of 3-bedroom dwellings in the area has increased and we have witnessed families returning.

In drafting provisions about dwelling sizes/number of bedrooms, it will be important that these provisions are not limited to large blocks. Any such limitation would likely lead to developers preferring small blocks over large blocks for multi-unit development. In established areas, this would mean less amalgamation of blocks, producing less desirable overall development outcomes for the area.

We hope that there will be consultation on the Design Guidelines, once these are drafted.

#### ***Solar envelope***

We note that for blocks released prior to 5 July 2013, the solar envelope has been raised by 0.6m in the primary building zone, and by 0.5m in the rear zone. This will have an adverse impact on solar

access for existing dwellings and their private open space. The impact could be very significant in some cases. This change should not be made.

### ***Outcome focussed planning system***

For an outcome-focussed planning system to achieve desirable development outcomes, the quality of the assessment is critical. In our experience in Turner, the ACT Planning and Land Authority (ACTPLA) has often failed in this, often accepting statements made by developers without adequate investigation, and giving little consideration to the amenity of future residents of a proposed multi-unit development or of its neighbours. This has led us to seek ACAT review of a number of planning approvals in our local area, which has then forced developers to redesign developments to achieve better outcomes. The ACAT tribunals have found many issues with the relevant approvals.

To be effective, ACTPLA needs to be willing and able to reject poor designs early in the assessment process and push developers to improve their designs. It is evident that many developers start their design process by first designing to the maximum site coverage and gross floor area allowed in the relevant codes. Then, only as a secondary consideration, tweaking the design to comply with other aspects of the codes that are intended to achieve a high standard of residential amenity, e.g. solar access, privacy, landscaping and driveways/parking. This process can continue past lodgement of the development application, as developers respond to concerns raised by ACTPLA with particular aspects of the proposal. As residential amenity is not put first, this approach does not achieve an optimal outcome for future residents or the community. Developers must be made to focus on amenity from the start of the design process.

### ***Our previous input to planning discussion***

We attach a submission which we, along with other local residents, made on a previous ACT Government planning review document (the 2017 *Housing Choices Discussion Paper*). Much of that submission is still relevant today. In particular, we draw your attention our responses to questions 4, 5 and 9 regarding housing diversity; and questions 7, 8 & 9 regarding good design.



## Housing Choices Discussion Paper

### Submission

We are seven leaseholders living in [REDACTED]. We welcome the opportunity to provide a submission to the *Housing Diversity Discussion Paper* (the Discussion Paper) released November 2017.

Our answers to the questions posed in the Discussion Paper are at **Attachment A**. These answers draw from our experience and observations as residents of RZ3 and RZ4 areas in Turner, as well as our analysis of relevant Australian Bureau of Statistics (ABS) census data which is summarised at **Attachment B**.

Question 5 is the most pertinent to our situation in Turner. It is unfortunate that the Discussion Paper did not include an assessment of the impact on housing diversity in Turner as a result of urban infill policy over the past 15 years. Of particular relevance is the influence of the investor-driven market. Such an assessment could have provided lessons learned and helped to shape future planning policy. In our experience, and ABS data analysis, housing diversity in Turner does not meet community needs which includes families and the Turner School. Over 75% of dwellings in Turner are units and over 70% of dwellings have two or less bedrooms, many of which are poorly designed and built investor-grade product. The options presented in the Discussion Paper regarding RZ3 and RZ4 areas would only expand and intensify what has gone on before in Turner which failed to deliver desirable housing diversity. For these reasons we cannot see the rationale for the options which rely on economic analysis that is not presented (and is later contradicted) and do not address housing diversity. RZ3 and RZ4 provide a gradual transition in established areas, particularly where there is key infrastructure in place such as schools, and manages impact on residents in established areas who choose to remain in their homes. Dwellings need to be of quality in design and build that attract long-term residents because they see these dwellings as a place to make their home. This helps to build communities who are invested in, and care about their local environment.

[REDACTED]  
[REDACTED]

[REDACTED]  
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[REDACTED]  
[REDACTED]



## Answers to questions posed by the Discussion Paper

### 1. What would help you to better understand the ACT planning system?

The Discussion Paper notes that *“In developing strategies and legislation, the government is guided by community expectations and aspirations”* (page 9). Consultation provides an important opportunity to educate the community on ACT planning system. The Discussion Paper does provide a useful high-level overview of the system.

Members of the community sometimes need to engage with the ACT planning system when they are dealing with new developments or alterations to dwellings on neighbouring properties or in their local area. Impacts to amenities are highly important. For us living in an established area like Turner, there is also a high-level of interest in the quality of developments, including build quality, amenities for residents and the broader impact on the neighbourhood.

Navigating the various Territory Plan Codes is daunting due its complexity, particularly when dealing with the details and implications of the various Rules and Criteria. It would be useful to have insight into how development applications are assessed against the more subjective Criteria, and how terms such as ‘desired character’ are applied.

It would be very beneficial to provide training to the community on such matters. This could be delivered through presentations at community meetings for large proposed developments or by online training videos. What could be useful is a demonstration of how EPSDD personnel conduct their assessments using either hypothetical examples or actual case studies. These examples could also illustrate what makes the difference between passing and failing to meet particular Criteria.

Additional benefits include increasing the transparency of EPSDD assessment and decision process, and that the community is better informed and are part of the planning process.

### 2. What do you think about the current range of housing options in the lower density suburbs?

#### *Ageing Population*

There is no doubt that the proportion of the population over 65 will continue to increase in the long-term (Figure 9, page 22) and that ‘ageing in place’ is beneficial. Residents of the ACT had the longest life expectancy in Australia in 2014-16<sup>1</sup>. ABS data<sup>2</sup> shows movement into apartments is currently occurring in the 70+ age group. With ongoing technological advances, it is likely that the ageing population may prefer to stay in their homes even longer before choosing to down-size. The ACT Government’s commissioned survey also indicates that the

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<sup>1</sup> Australian Bureau of Statistics (2017). 3302.0.55.001 - Life Tables, States, Territories and Australia, 2014-2016. <http://www.abs.gov.au/ausstats/abs@.nsf/Latestproducts/3302.0.55.001Main%20Features22014-2016?opendocument&tabname=Summary&prodno=3302.0.55.001&issue=2014-2016&num=&view>

<sup>2</sup> Australian Bureau of Statistics. (2017). 2071.0 - Census of Population and Housing: Reflecting Australia - Stories from the Census, 2016. <http://www.abs.gov.au/ausstats/abs@.nsf/Lookup/by%20Subject/2071.0~2016~Main%20Features~Apartment%20Living~20>

65+ group were the least likely group to move in the next decade<sup>3</sup>. This has implications for separate housing stock in lower density suburbs. More refined information is needed on the housing needs and preferences of the 65+ age group so that short- and long-term planning involving affected communities can achieve coordinated development that matches community needs.

### *Families*

The Discussion Paper notes that since 1991, the proportion of couples with children has decreased by 14%. In comparison, the number of couples with no children and single persons living alone increased. Figure 11 (page 24) also shows however that the rate of decline for all family household groups is slowing and projected to flatten over the next 20 years. It is projected that couples with children and single parents will still make up about 40% of households in 2036, and couples without children an additional 28%, with lone persons at 26%. Despite families continuing to be the predominant household type, the housing needs of families do not feature in the Discussion Paper.

In Turner, the ACT Government's existing policies designed to increase density in RZ3 and RZ4 areas has impacted on local families. Primarily it has had a negative impact on housing affordability in the RZ1 areas in two ways:

1. Developers competed with prospective home owners for houses located in RZ3.
2. The replacement of 3-bedroom family homes with predominantly 1- and 2-bedroom units, driven by the investor market rather than community needs, limited the supply of dwellings suitable for families in Turner as a whole.

As a result, separate housing stock decreased from 408<sup>4</sup> in 1996 to 249 in 2016<sup>5</sup>.

This experience provides valuable lessons about housing options in RZ1 areas where a more considered implementation of urban infill policy needs to take into account: the housing needs of families; existing infrastructure such as schools (in this case Turner School); and the impact that policies for higher-density areas have on housing choices and affordability in nearby RZ1 areas.

### **3. What changes would you support in the RZ1 zone to improve housing choice?**

The Discussion Paper puts forward a case for more dual occupancies in RZ1 areas. This is in response to a survey<sup>6</sup> commissioned by the ACT Government which showed that 50% of residents would like to stay living in their communities as they age. About 20% also said that their dwelling-of-choice is not available in their community and more than 50% residents said there should be more dual occupancies. The Discussion Paper notes that 50% of people surveyed would undertake a dual occupancy development if it could be separately titled.

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<sup>3</sup>Winton Sustainable Research Strategies (2015). *Report on the 2014 Housing Choices Community Survey*, Canberra: ACT Government.

<sup>4</sup> Figure for 1996 derived from data in the Australian Bureau of Statistics, 2001 Time Series Profile, Turner (TSP 805058289), Table T18: Dwelling Structure.

<sup>5</sup> Figure for 2016 derived from data in the Australian Bureau of Statistics, 2016 Census Community Profiles for Turner (SSC80123), Table B32: Dwelling Structure.

<sup>6</sup> Winton Sustainable Research Strategies (2015). *Housing Choices Community Survey*, Canberra ACT Government.

The survey results are not as clear-cut as the Discussion Paper describes. Figure 6 (page 20) shows that 0% of those surveyed are expecting to move to a dual occupancy or townhouse. In the ideal world, the overwhelmingly majority of those surveyed wanted a detached house, while only about 2% and 5% wanted a dual occupancy or townhouse, respectively.

Figure 7 (page 21) provides insight on the opinions of those surveyed on various residential dwelling types. While a total of about 50% favour more dual occupancies: about 35% think there should only be a few more; only about 15% think there should be a lot more; and about 45% think there is enough.

The evidence from the survey does not provide evidence of strong support to increase dual occupancies. While not commenting on the merits of dual occupancies in RZ1, we do think that where it is allowed, separate title would be sensible. This is likely to encourage more dual occupancy development and improve housing affordability by increasing supply at the same time as reducing the land cost for each dwelling. This could also help the ACT decrease its ecological footprint. The amenities of neighbours and the neighbourhood however should be protected.

#### **4. What changes would you support to help increase diversity of housing choices in the RZ2 zone?**

The Discussion Paper proposes removal of the dwelling replacement Rule in the RZ2 zone as an option (page 25). This Rule requires that when a house is demolished to make way for multi-unit housing, the new development must contain a dwelling of at least the same number of bedrooms as the demolished dwelling. If more than one house is demolished, this applies for each demolished house.

We do not support removal of building replacement unless a better mechanism is introduced to ensure developments include larger dwellings. This must not be left to market forces (which are distorted by a large investor market). Some analysis of the impact of market forces on Turner is provided in response to Question 5 below.

The dwelling replacement Rule was introduced into the Multi-unit Housing Development Code, effective from 05 July 2013. This Rule was in response to concerns about the increase in one-bedroom dwellings in areas like Turner. It was intended to increase the supply of larger units in new developments. In Turner in 2006, families and single parents with children represented 15.4% of total households. This decreased slightly to 14.7% in 2011 but increased in 2016 to 16.6%<sup>7</sup>. This reversal of the trend in the proportion of families with children living in Turner between 2011 and 2016 may reflect the success of the dwelling replacement Rule.

Before making any decision on the replacement Rule, an assessment of its impact needs to be conducted.

#### **5. What changes would you support to the medium density residential zones to improve housing choice?**

As long-term residents of Turner (RZ3 and RZ4 areas) we offer our experience and views on the housing choices resulting from urban infill development over the past 10 – 15 years.

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<sup>7</sup> For the derivation of proportions of families in Turner in 2006, 2011 and 2016, refer to [Table B3](#) and [Table B4](#) in **Attachment B**.

The Discussion Paper presents a number of drivers that may influence demand for housing across the ACT. These drivers include:

- growing and ageing population;
- changes in household structures; and
- desire of residents to stay living in their communities as they age.

In addition, ACT government needs to balance limited land available for new housing with moving to a more sustainable compact city. The Discussion Paper proposes ways to increase density as the primary mechanism to increase housing choices.

It is unfortunate that the Discussion Paper does not include an assessment of the impact in Turner of urban infill policy over the past 15 years, particularly the influence of the investor-driven market. This policy was designed to increase housing density as well as diversity, and would be extended and intensified through proposals in the Discussion Paper. The lessons learned from such an assessment could help to inform and improve future planning policy development.

The Discussion Paper notes that “*A diversity of housing choices is already available in the community of these areas*” [Inner North Canberra, Gungahlin and green field areas]. In our experience, the housing diversity created by these policies in Turner does not meet ACT community needs. What has been created by market forces, driven by investors’ not residents’ needs, is an oversupply of small units, many of which are of poor quality “investor grade product”<sup>8</sup>.

According to a report by CoreLogic (2016), investors in Canberra owned 13.4% of detached dwellings and 42.5% of units – 23.4% of total dwellings<sup>9</sup>. This demonstrates that investors are choosing to invest in apartments, rather than houses in Canberra. ABS data indicates that approximately 53% of units in Turner are privately rented<sup>10</sup>. Allhomes (2016) noted that investors are drawn to Canberra by prices that are significantly lower than in Sydney making the yield more attractive. According to the Real Estate Institute ACT many of the occupants of units are young professionals and contractors.<sup>11</sup> This concentration of rental properties in the suburb means that there is a high turnover of population. This in-turn impacts on the ability of the area to develop and maintain community support for facilities such as the Turner Tennis Club, Turner Bowling Club and, importantly, Turner School.

Over 75% of dwellings in Turner are now units<sup>12</sup>. The number of bedrooms in units is shown in Table A1 below. The majority of units are 2-bedroom, with almost as many 1-bedroom units. Less than 10% of units have 3- or more bedrooms. This means that over 70% of Turner dwellings are units with 2 or less bedrooms. The average number of bedrooms per unit has decreased over the last 5 years.<sup>13</sup>

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<sup>8</sup> Randolph, B. (2017). *Why investor-driven urban density is inevitably linked to disadvantage*, The Conversation. <https://theconversation.com/why-investor-driven-urban-density-is-inevitably-linked-to-disadvantage-82073>

<sup>9</sup> CoreLogic (2016). *Profile of the Australian Residential Property Investor*, page 16.

<sup>10</sup> For the derivation of proportions relating to unit rentals, refer to Table B8 and Table B9 in **Attachment B**.

<sup>11</sup> Duke, J. and Packham, R. (2016). *Canberra Suburbs Owned by Investors*, Allhomes. <https://www.allhomes.com.au/news/the-canberra-suburbs-owned-by-investors-20160623-gpq5e5/>

<sup>12</sup> For the number and proportion of units in Turner, refer to Table B1 and Table B2 in **Attachment B**.

<sup>13</sup> For the number of bedrooms in dwellings in Turner, refer to Table B6 and Table B7 in **Attachment B**.

**Table A1: Bedrooms per unit in Turner**

Number of Bedrooms	2011		2016	
	Number of Units	Percentage of Total Units	Number of Units	Percentage of Total Units
None or one	441	37.2	516	39.0
Two	625	52.8	684	51.7
Three or more	118	10.0	124	9.4

Given the community household profile in the ACT (see answer to Question 2 above), this does not reflect community needs. Reducing the proportion of unit developments and increasing the proportion of townhouse-style developments would produce a mix of dwellings more in line with ACT community need (see [Table A2](#) below regarding bedroom numbers in townhouses in Turner). Townhouses are scarce in Turner – in 2016 they comprised about 10% of dwellings.<sup>14</sup>

**Table A2: Bedrooms per townhouse in Turner**

Number of Bedrooms	2011		2016	
	Number of T'houses	Percentage of Total T'houses	Number of T'houses	Percentage of Total T'houses
None or one	11	8.5	22	12.0
Two	30	23.3	31	16.9
Three or more	88	68.2	130	71.0

As the ACT Government's own survey shows<sup>15</sup>, the preferred housing choice is overwhelmingly the detached house. It is clear from the survey that the ACT Government is not convincing the community of the benefits of a more compact city. This is due to past undesirable planning outcomes which impact on residents and cannot be changed once in place. If the Government seeks to change preferences, it should institute measures which will make higher-density housing more desirable, for example by ensuring that it achieves:

- high quality build and design, including for energy efficiency and resident amenity;
- an attractive environment; and
- dwelling structures and sizes which suit the mix of the ACT community.

Refer to Question 8 for further elements of good design.

<sup>14</sup> For the number and proportion of townhouses in Turner, refer to [Table B1](#) and [Table B2](#) in **Attachment B**.

<sup>15</sup> Winton Sustainable Research Strategies (2015). *Report on the 2014 Housing Choices Community Survey*, Canberra: ACT Government.

The Discussion Paper however proposes to either: combine RZ3 and RZ4 into a single zone with current RZ4 provisions; or maintain RZ3 and RZ4 zones but change plot ratio provisions to promote greater density. The reasons given are:

- research that suggests there may be efficiencies in combining RZ3 and RZ4 zones;
- alignment with planning zones used in Australia's eastern states; and
- economic analysis that recommends increasing plot ratios in RZ3 and RZ4 zones.

Details or references for the research and economic analysis are not provided. It is therefore difficult to understand clearly the justification for what is proposed. None of the above reasons relate to increasing diversity in housing choices.

Alignment with other jurisdictions would be reasonable only if there was evidence that the systems of these jurisdictions have produced positive results in circumstances similar to those facing the ACT – this does not appear to be the case as Sydney and Melbourne deal with similar issues.<sup>16</sup>

The Discussion Paper refers to economic analysis which shows that only greenfield developments and apartment buildings greater than six storeys are economically viable. It is unfortunate that at least one case study was not presented in the Discussion Paper to illustrate this claim. Other evidence presented in the Discussion Paper on page 32 contradicts this analysis. Noted on page 32 is a trend in recent development applications towards RZ2 style developments (*e.g.* town houses) in RZ3 and RZ4 zones. The Discussion Paper notes that this is being driven by demand for multi-unit developments and encouraged through flexibility in RZ3 and RZ4 provisions. We have also observed two-storey townhouse development in the RZ4 area of Turner. Taken together this provides direct evidence that development at the lower end of the medium-density scale is economically viable.

For reasons outlined above we cannot see the rationale for the options regarding RZ3 and RZ4 areas presented in the Discussion Paper. The proposed options would intensify what has gone on before in Turner, which has failed to deliver suitable diversity. RZ3 and RZ4 areas provide a transition in established areas, particularly where there is key infrastructure in place such as schools, and manages impact on residents in established areas who choose to remain in their homes.

Broadly there needs to be recognition by the ACT Government that short- and long-term planning in established areas needs to engage affected communities to achieve coordinated development that matches community needs, and provide for a period of transition. Planning policy also needs to recognise and address the added complexity of the investor market on the pattern of development. The impact of investor influence could be ameliorated through planning and approval processes that discourage the building of so-called “investor grade product”, which is pitched at a price point rather than to a high quality standard that will meet the long-term needs of owner occupiers who want homes.

## **6. Do you think we have the right balance of residential zones to support greater housing choice?**

The current range of zones provide for a transition from low- to high-density in established areas. We consider this to be valuable for managing change in established areas. The Rules for

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<sup>16</sup> Birrell, B. and McCloskey, D. (2015). *The housing affordability crisis in Sydney and Melbourne, Report One: The demographic foundations*, The Australian Population Research Institute, Monash University.



developments in the medium-density zones however have not achieved a good outcome in terms of suitable housing options or affordability (as indicated in the answer to Question 5 above). Therefore changes to the Rules for each zone, not the zones, could be investigated to achieve the desired housing choices. Refer to our answer to Question 9 below for more discussion.

Consideration could be given to specific zoning around significant community infrastructure such as schools located in higher-density zoned areas. This could include developing strategy/guidelines on how to include families in planning and developing a 'school zone' where dwellings must align with the strategy/guidelines (see Toronto example below in the answer to Question 7).

#### **7. Are you aware of a best practice model in another city that we should examine?**

The City of Toronto has developed a strategy and guidelines of how to include families in high-rise developments with corresponding neighbourhood requirements to develop an enjoyable environment for all members of the community. Unit, building and neighbourhood case studies are provided, including international examples. While this policy is about much taller buildings than considered here in the ACT, the City of Toronto work may be a good source of ideas<sup>17</sup>.

It may also be worth exploring housing development using what is known as the 'intentional' or 'deliberative' model<sup>18</sup>. Local residents and architects work together to deliver housing projects which are not driven by developers. This model has been successful in the US and Europe, for example the Baugruppen model in Berlin<sup>19</sup>. An Australian model is Nightingale Housing<sup>20</sup> which started in Melbourne but now also has projects in Brisbane and Fremantle. The outcome is more affordable housing of a type that is wanted by local residents who care about the impact on their community and environment. There should be an investigation if there are any impediments to this development model in the ACT, and if not, community awareness maybe required.

#### **8. What is good housing design? What elements make a good residential building or development?**

We are pleased that the ACT Government has commenced the establishment of a single urban design advisory panel to be chaired by the ACT Government Architect. The Discussion Paper notes that Panel considerations will form part of the pre-development application process. It will provide independent expert design advice for private sector development proposals and key public infrastructure projects.

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<sup>17</sup> City of Toronto (2017). *Growing Up: Planning for Children in New Vertical Communities*. <https://www.toronto.ca/city-government/planning-development/planning-studies-initiatives/growing-up-planning-for-children-in-new-vertical-communities/>

<sup>18</sup> Twil, J. (2017). Super-sized cities: residents band together to push back against speculative development pressures, The Conversation. <https://theconversation.com/supersized-cities-residents-band-together-to-push-back-against-speculative-development-pressures-77553>

<sup>19</sup> Ring, K. (2016). *Reinventing density: how baugruppen are pioneering the self-made city*, The Conversation. <https://theconversation.com/reinventing-density-how-baugruppen-are-pioneering-the-self-made-city-66488>

<sup>20</sup> Nightingale Housing. <http://nightingalehousing.org/>

Below we have suggested principles and housing design features for consideration as the ACT Government develops the framework for how the Panel will work.

- Dwellings are designed for longer-term living – they are homes.
- Incorporate communal spaces to aide building communities who form an attachment to their environment.
- Water and energy efficient (including good solar access).
- Quality design that enhances, rather than detracts from, the distinctive character of Canberra.
- Efficient and adaptable use of space – perhaps designing for families provides a good default in design of space. As the Discussion Paper states on page 23, *“a single space may act over time as a home office, a nursery, a study, bedroom for an elderly relative”*.
- Ensure a high build quality.
- Excellent sound proofing – you want to be able to carry a conversation without needing to compete with sound from neighbouring residents.
- Use of the latest practices to lay foundations in clay soil.
- Providing an attractive environment, including from within a development and streetscape, and maintaining the garden city character in all zones as much as possible.
- Access to green spaces on site if not already in the immediate vicinity (*i.e* adjacent or nearby parkland), noting the significant positive health impact this has on the community.
- Encourage developers to use good design principles as a starting point. Almost invariably we have seen development applications start from the basis of how many units can fit on the block. The designs are then tweaked later to meet planning Codes. This is how so many developments in Turner fail maximise north-facing orientation and assume a character that detracts from, rather than enhances, the neighbourhood environment.
- Avoid blocks consisting of only one- or two-bedroom units but instead incorporate these into large developments along with larger dwelling types. Data indicates that smaller units are predominantly occupied by transient residents, which does not provide for the development of local communities which are important for long-term sustainability.
- Inclusion of townhouses with small gardens.
- Investigate how pets may be accommodated in higher-density dwellings.

## **9. How can design outcomes for medium to higher density residential development be improved?**

All of what we have noted above in Question 8 is applicable for medium- to higher-density residential development. Essentially it needs to be good quality, larger dwellings that residents can call home and form communities who care about their environment – all important to long-term sustainability.

In Turner, there is a need for larger dwellings as currently only 7% of total dwellings comprise of apartments with 3- or more bedrooms, and townhouses with 3- or more bedrooms<sup>21</sup>. Increasing these dwelling types would provide accommodation suitable for families with

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<sup>21</sup>Figures from Table B1, Table B6 and Table B7 (in **Attachment B**) were used to derive the proportion of units and townhouses with 3- or more bedrooms in Turner.



children attending Turner School, Lyneham High School, Dickson College or ANU; and for those wishing to 'age in place', as well as those who work in Civic or Acton.

The Rules in Codes for relevant Zones could be investigated to provide solutions to the following issues:

- Appropriate dwelling diversity to meet community needs, as this has not been achieved successfully by market forces *i.e.* developers are catering for investors not residents.
- Greater energy efficiency, including solar access and passive solar design, particularly avoiding east-west orientation.
- Greater protection of amenity for existing residents impacted by new developments, particularly if they choose to age in their own home.
- Maintenance of the garden city character of Canberra.
- Ready access to green space for all residents of new medium-density developments (on site if not already in the immediate vicinity). This has health benefits as noted above in Question 8.

The 'intent of element' sections should be reintroduced to the development Codes to provide better guidance on how the more subjective Criteria are assessed. This should be accompanied by relevant performance measures/indicators to be used for each Criterion.

**10. What are examples of well-designed residential development in your neighbourhood or elsewhere?**

*Neighbourhood*

- The Space, Northbourne Avenue – quality
- City Edge, O'Connor – well-built, secluded and an enjoyable environment created by an attractive central green space.

*Elsewhere*

- Park Square, Port Melbourne: While expensive there are some development principles worth noting. Dwellings are of a good quality and a mixture of two-storey terraces, duplexes and separates. They are designed to be long-term homes. They have a small amount of garden and green spaces for recreation and socialising. The development is within walking distance to the light rail which is also flanked by green spaces and low-rise (mostly period single-storey) terrace housing – all of which provide for a pleasant environment. The shops are within walking distance. On these couple of shop streets are the only apartment buildings of about 4 or 5 storeys.
- Burwood Road, Canada Bay, Sydney: Similar to above development however more mixed with townhouses and apartments with multiple bedrooms and varying sizes of gardens or balconies. A mix of two or three storeys. Good communal green spaces. Mixed population of couples, young families and elderly. A bus service takes residents to Burwood Station and local shops as well as a ferry into Circular Quay

## Analysis of Australian Bureau of Statistics (ABS) Census Data

The years provided in the various tables below are census years. For the purpose of this analysis the ABS terms:

- 'semi-detached, row or terrace house, townhouse *etc*' will be referred to as 'townhouse'; and
- 'flat, unit or apartment' will be referred to as 'units'.

**Table B1: Number of private occupied dwelling structures**

Type of Dwelling	Turner				ACT			
	2006	2011	2016	% Change	2006	2011	2016	% Change
Separate house	382	337	249	↓ 34.8	92150	96769	99109	↑ 7.6
Townhouse	87	131	186	↑ 113.8	16622	19659	26915	↑ 61.9
Units	954	1198	1360	↑ 42.0	13827	18158	24069	↑ 74.1
<b>*Total</b>	<b>1423</b>	<b>1666</b>	<b>1807</b>	<b>↑ 27.0</b>	<b>122900</b>	<b>135037</b>	<b>150693</b>	<b>↑ 22.6</b>

\*This total includes "other dwellings" and "dwelling not stated" which are not listed separately in Table B1. 'Unoccupied' numbers became available in 2011 and 2016 and these numbers are also included in the total.

- Turner, and the ACT more broadly, have seen a similar increase in the overall number of dwellings – increases of about 27% and 23% respectively.
- In the last 10 years, Turner has seen an increase in higher-density housing while the number of separate houses has decreased by 35%. In the ACT separate houses increased by 8%.
- In 2011 and 2016, the number of unoccupied dwellings in Turner was 191 and 227 respectively (not shown in Table B1).
- The figures in Table B1 above were obtained from:
  - ABS, 2006 Basic Community Profile, Turner (SSC81481), Table B31: Dwelling Structure
  - ABS, 2011 Basic Community Profile, Turner (SSC80097), Table B31: Dwelling Structure
  - ABS, 2016 Census Community Profile, Turner (SSC80123), Table G32: Dwelling Structure

**Table B2: Percentage of private occupied dwelling structures\***

Type of Dwelling	Turner			ACT		
	2006	2011	2016	2006	2011	2016
Separate house	26.8	20.2	13.8	75.0	71.7	65.8
Townhouse	6.1	7.9	10.3	13.5	14.6	17.9

Units	67.0	71.9	75.3	11.3	13.5	16.0
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\*Calculated from data in [Table B1](#)

- In 2016, only 14% of dwellings in Turner were separate houses, down from 52% in 1996. In the ACT more broadly, separate houses decreased slightly between 2006 and 2016 but continue to be the dominant dwelling type at 66%.
  - Data for 1996 was obtained from ABS, 2001 Time Series Profile, Turner (TSP 805058289), Table T18 Dwelling Structure.
- Townhouses represent only a small proportion of dwellings in Turner, at about 10% of dwellings in 2016, compared to 18% in the ACT.
- At 75%, units were the overwhelming dwelling type in Turner in 2016, compared to 16% with the ACT. In the past 10 years, units have increased in both Turner and the ACT however Turner already had a large imbalance in favour of units in 2006.

**Table B3: Household types**

Household Type	Turner			ACT		
	2006	2011	2016	2006	2011	2016
Couple family with children	160	183	226	39584	42976	47747
One parent family	58	62	73	12562	13195	13744
<b>Total families with children</b>	<b>218</b>	<b>245</b>	<b>299</b>	<b>52146</b>	<b>56171</b>	<b>61491</b>
Couples with no children	386	489	507	30012	34359	37355
Lone person household	579	627	693	27121	30249	35413
<b>Total*</b>	<b>1419</b>	<b>1665</b>	<b>1807</b>	<b>122900</b>	<b>135037</b>	<b>150693</b>

\*The total used from the ABS data to calculate the proportions above also included 'other family' and 'group household' which are not listed separately in [Table B3](#).

- All types of family households have increased in Turner between 2006 and 2016.
- There has also been an increase in lone person households.
- While the percentage of family households is decreasing in the ACT, the actual increase in the number of families (16,688 including couples with no kids) is double the increase in lone person households (8,292) over the period. Thus there is a need to continue to provide housing suitable for, and attractive to, families.
- The figures in [Table B3](#) above were obtained from:
  - ABS, 2006 Basic Community Profile, Turner (SSC81481), Table B24: Family Composition and Table B30: Household Composition
  - ABS, 2011 Basic Community Profile, Turner (SSC80097), Table B25: Family Composition and Table B30: Household Composition



- ABS, 2016 Census Community Profile, Turner (SSC80123), Table G25: Family Composition and G31: Household Composition

**Table B4: Household types as a percentage**

Household Type	Turner			ACT		
	2006	2011	2016	2006	2011	2016
Couple family with children	11.3	11.0	12.5	31.7	31.8	32.2
One parent family	4.1	3.7	4.0	9.1	9.8	10.2
<b>Total families with children</b>	<b>15.4</b>	<b>14.7</b>	<b>16.6</b>	<b>40.8</b>	<b>41.6</b>	<b>42.4</b>
Couples with no children	27.2	29.4	28.1	27.8	25.4	24.4
Lone person household	40.8	37.7	38.4	23.5	22.4	22.1

Note: Calculated from [Table B3](#) above. The total used from the ABS data to calculate the proportions above also included 'other family' and 'group household' which are not listed separately in [Table B4](#).

- In 2016, families with children represented about 17% of households in Turner compared to 41% in the ACT. Families with children represented 26% of Turner households in 1996, indicating a rapid decline from 1996-2006. The proportion of families with children in Turner continued to fall to 2011.
  - Figures for 1996 were obtained from ABS, 1996 Census Basic Community Profile, Turner (2901.0), Table B27 Dwelling Structure by Household Type and Family Type.
- Families with children increased proportionally between 2011 and 2016.
  - This may correlate to the introduction of Dwelling Replacement Rule 5 in the Multi-unit Housing Development Code of the Territory Plan (Variation 306, effective from 05 July 2013).
  - This mandatory rule specifies the replacement of the previous dwelling with at least one dwelling with an equal or greater number of bedrooms within a new development.
  - This may have increased the number of three bedroom dwellings in Turner and attracting some families back to the area.

**Table B5: Household type and dwelling type in Turner**

Household Type	Dwelling Type 2016			
	Separate House	Unit	Townhouse	Total
Couple family with children	76 34.5%	117 53.1%	27 12.3%	220
One parent family	12 18.2%	44 66.7%	10 15.2%	66
<b>Total families with children</b>	<b>88 30.8%</b>	<b>161 56.3%</b>	<b>37 12.9%</b>	<b>286</b>
Couples with no children	76 15.1%	378 75%	50 9.9%	504
Lone person household	43 6.3%	590 85.9%	54 7.9%	687

\*The numbers of families are lower than in [Table B3](#) as 'dwelling structure not stated' is excluded. Data only available for 2016.

- Most families in Turner live in units.
- More units are occupied by lone persons than families.
- Most houses in Turner are occupied by families.
- The figures in [Table B5](#) above were obtained from ABS, 2016 Census Community Profile, Turner (SSC80123), Table G39: Dwelling Structure by Household and Family Composition.

**Table B6: Bedrooms per unit in Turner**

Number of Bedrooms	2011		2016	
	Number of Units	Percentage of Total Units	Number of Units	Percentage of Total Units
None or one	441	37.2%	516	39.0%
Two	625	52.8%	684	51.7%
Three or more	118	10.0%	124	9.4%
<b>*Total</b>	<b>1184</b>		<b>1324</b>	

\*The totals are less than shown in [Table B1](#) as 'number of bedrooms not stated' is excluded.

- In 2016, units made up about 75% of dwellings in Turner ([Table B2](#)).
- From 2006 to 2016 there has been a small decrease in the proportion of units that have two bedrooms, or three or more bedrooms. There has been a small increase in no or one bedroom units.

- Units provided 95% of no or one bedroom dwellings, and about 90% of two bedroom dwellings (calculated from data in [Table B6](#), [Table B7](#) plus data for houses not shown).
- 24.8% of all dwellings with three or more bedrooms were units in 2011, increasing to 26.2% in 2016. This could be due to dwelling replacement Rule.
- The figures in [Table B6](#) above were obtained from ABS, 2016 Census Community Profile, Turner (SSC80123), Table G38: Dwelling Structure by Number of Bedrooms.

**Table B7: Bedrooms per townhouse in Turner**

Number of Bedrooms	2011		2016	
	Number of T'houses	Percentage of Total T'houses	Number of T'houses	Percentage of Total T'houses
None or one	11	8.5	22	12.0
Two	30	23.3	31	16.9
Three or more	88	68.2	130	71.0
<b>*Total</b>	<b>129</b>		<b>183</b>	

\*The totals are less than shown in [Table B1](#) as "number of bedrooms not stated" is excluded.

- Townhouses generally comprise of three or more bedroom dwellings although this has decreased substantially from about 67% in 2011 to 47% in 2016.
- There seems to be a movement to no or one bedroom dwellings being provided within townhouse type developments.
- In 2016, 95% of no or one bedroom sized dwellings in Turner was provided by units versus 4.1% of townhouses.
- In 2016, 26% of three or more bedroom dwellings in Turner were provided by units versus about 19% of townhouses.
- The figures in [Table B7](#) above were obtained from ABS, 2016 Census Community Profile, Turner (SSC80123), Table G38: Dwelling Structure by Number of Bedrooms.

**Table B8: Number of owned and privately rented units in Turner and the ACT**

Tenure	Turner			ACT		
	2006	2011	2016	2006	2011	2016
Owned or being purchased by resident	216	300	365	3070	4739	6432
#Private rental	484	664	727	6268	8798	12460
<b>*Total</b>	<b>954</b>	<b>1198</b>	<b>1360</b>	<b>13827</b>	<b>18158</b>	<b>24069</b>

#Includes 'Real estate agent' and 'Person not in same household'.

\*Total includes 'Territory housing authority', 'Housing co-operative/community/church group', 'Other landlord type', 'Landlord type not stated' and 'Tenure type not stated'.



**Table B9: Proportion of owned and privately rented units in Turner and the ACT**

Tenure	Turner			ACT		
	2006	2011	2016	2006	2011	2016
Owned or being purchased by resident	22.6%	25.0%	26.8%	22.2%	26.1%	26.7%
#Private rental	50.7%	55.4%	53.5%	45.3%	48.5%	51.8%

*#Includes 'Real estate agent' and 'Person not in same household'.*

- The figures in Table B8 and B9 above were obtained from:
  - ABS, 2006 Basic Community Profile, Turner (SSC81481), Table B23: Tenure and Landlord Type by Dwelling Structure
  - ABS, 2011 Basic Community Profile, Turner (SSC80097), Table B32: Tenure and Landlord Type by Dwelling Structure
  - ABS, 2016 Census Community Profile, Turner (SSC80123), Table G33: Tenure and Landlord Type by Dwelling Structure

## **Submission on Draft Inner North and City District Strategy**

### Re Proposal to investigate expansion of Mount Majura Nature Reserve to include Hackett Horse Paddock

This submission of users and supporters of the Hackett Horse Paddocks wishes to indicate our opposition to the proposal to consider expansion of the Mount Majura Nature Reserve to incorporate the Hackett Horse Paddocks, which would result in the closure of this long standing community facility.

As users of this public facility, for periods ranging from 3 -25 years, we are disappointed the ACT Government has failed to engage with us despite this matter having been subject to a previous resolution of the ACT Legislative Assembly in 2021 and subsequent formal ACT Government response. While we have become aware of further investigations subsequently being undertaken by the Environment, Planning, Environment and Sustainable Development Directorate as to the ecological conditions on the site, there has been no attempt by ACT Government officials to engage directly with Hackett Horse Paddock agistees. In addition our written email request on 3/2/2023 to [ESPSDDComms@act.gov.au](mailto:ESPSDDComms@act.gov.au), via the Your Say website, seeking a discussion with ESPDD representatives on the proposal outlined in the draft District Strategy has received no reply.

The Hackett Horse Paddocks have been in ongoing use as a basic, low cost, public horse agistment facility for over a half a century. The paddock area is small and supports no more than 8 horses at any one time. The close proximity of the paddocks to the formed trails of the Mount Majura and Mount Ainslie Nature Reserves, which incorporate sections of both the National Bicentennial Horse Trail and Canberra Centenary Trail, make it a valued and well utilised public equestrian facility.

Key issues which should be considered by the ACT Government;

- 1) Value of maintaining existing formal recreational infrastructure in the Inner North.

Equestrian facilities are a long standing and valued component of formal recreation infrastructure developed by ACT authorities. Provision of low cost, public, horse agistment in close proximity to housing allows access to equestrian activity to the broader community. In particular it helps to enable access to this recreational activity which would otherwise prove to be prohibitively expensive for many people if the only option was private agistment facilities. In addition effective location of horse holding paddocks close to established residential areas enables access which would otherwise not be practicable due to distance and associated costs.

Demand for horse agistment at ACT Government facilities remains high, with many paddocks, including Hackett, having significant waiting lists. Previous closures of other ACT government horse paddocks as a result of development pressures have seen this demand exacerbated. Any consideration of the closure of the Hackett Horse Paddocks should have regard to the loss of the existing infrastructure investment at the site and the cost of replacing or augmenting infrastructure at a new location, if that was to occur.

Retention of the Hackett Horse Paddocks is consistent with the principles that have informed the operation of the Canberra open space system for many decades, which have allowed for a broad range of recreational uses, including walking, cycling and horse riding, in a compatible and sympathetic manner. These varied uses have demonstrated it is possible to protect the biodiversity



values of the nature reserve areas they frequently incorporate, while continuing to be in close proximity to residential areas.

## 2) Recognising environmental values.

It is recognised that the areas of the Hackett Horse Paddocks incorporate remnants of the Yellow Box – Redgum endangered ecological community. This is largely evident in the areas of established trees on the site, as the understorey has been disturbed through agistment and other grazing uses for well over a century. These areas are largely to the north and east of the existing site, with paddocks to the south largely devoid of trees.

As users of existing nature reserve areas we are supportive of measures which provide protection to endangered ecological communities. However we do not believe that protection of the existing ecological values of the site is inconsistent with the recreational values afforded by the operation of the horse paddocks. Indeed the maintenance of the existing ecological values of the site is a direct consequence of the site being designated as horse agistment, and therefore not being available for development. In addition agistees have been good custodians of the site, including through taking measures to protect established trees from damage during periods of drought and to managing weeds.

Should consideration be given to the further protection of existing ecological values we believe there are options open to the government which would still allow incorporation of existing equestrian activities on the site.

These could include measures to provide for the protection of a suitable corridor along the gully which traverses the paddocks east to west in the area immediately north of the current horse holding yards. Establishment of appropriate fencing and gates would enable this area to be further protected, allowing for the restoration of understorey vegetation, improved connectivity to the areas of Majura Nature Reserve to the east and improved connectivity between the eastern and western sides of Antill Street (where Justice Robert Hope Park is located). New fences and gates delineating this area would enable access for agisted horses between paddocks and the horse holding yards while improving further the biodiversity values of the site.

This is just one example of a range of approaches which could, and should, be considered to enable environmental and human activities to continue to be maintained and enhanced at the site.

## 3) Recognising community and human values.

The Hackett Horse Paddocks is not just a piece of physical infrastructure, it is a community. Users of the paddocks, their families, friends, and neighbours form close bonds through their shared use and involvement at the site. Paddock maintenance tasks and care of animals is routinely shared, and close relationships have been formed which help connect individuals to their community and neighbourhood. The closure of the paddocks would result in these bonds being broken, as agistees would either be required to move their horse further away to other locations, or cease their involvement in horse riding altogether. Some agistees have used this site for many decades and its loss would be a devastating outcome for them and others, adversely impacting on social and mental wellbeing. These human impacts should be properly and equally taken into account alongside environmental considerations.

Other community members of the community also benefit from the close proximity of equestrian uses at this location. In particular we draw to your attention to established relationships between staff and residents of the Ted Noffs facility for homeless youth and youth in crisis, and the equestrian users at the paddocks. There is frequent interaction between the horse owners, their horses and residents at the Ted Noffs residential facility and collocated CatholicCare Steps Program. This frequently involves young people utilising informal contact with horses agisted next door as a form of equine therapy, which has proven to be a very useful for young people suffering the impacts of trauma and subsequent mental health impacts. This informal equine therapy is utilised by staff to help teach young people in the residential care centre improved emotional regulation, distress tolerance, helping to reduce suicidal ideation. Horse agistees, Ted Noffs and CatholicCare management have also commenced discussions about formalising these relationships as part of an ongoing engagement with young people at the site. Closure of the paddocks would result in the loss of this community engagement which helps young people at risk.

We hope this submission provides the ACT Government with a more considered view of the issues arising from the proposal to consider closure of the Hackett Horse Paddocks as part of its potential incorporation into the Mount Majura Nature Reserve. We would encourage the government to give proper consideration to the real potential to continue to enhance human, as well as environmental values, at this site, to the benefit of the community as whole.

We would welcome the opportunity to discuss this submission further. We can be contacted at

[REDACTED]

Yours sincerely,

[REDACTED]

3/03/23

On behalf of

[REDACTED]

## Comments on ACT Planning System Review

### Overarching issues

- Lack of confidence in the integrity of the planning system. I think this is widespread in the community. It's not about change and increasing density but developers who always seem to expect and get more units, higher buildings, new roads or different land use to that outlined in zoning plans. It's new development and residential builds that have a hard surface on around 80 per cent of the block or more, two story buildings with very high first floors, windows and access to blocks not considering neighbours' privacy or amenity, building designs which are out of context for the context or lacking any visual aesthetic – just square, grey boxes.

Soft cover on blocks of around 30 per cent to 40 per cent of area should be retained. A house and garage of 70 per cent, paved entertaining area plus paved driveway, does not leave much room for shade or cooling vegetation.

Total building height should always be a consideration not just number of floors.

Impacts of excavations and fill on ground stability and water flow should be considered. It's not just big developments that may collapse or redirect groundwater or overland flow.

- Genuine community consultation and engagement in planning must be ensured. Under the new planning act and with outcomes-based planning the Minister will have considerable discretion. This needs to be exercised transparently and in the interests of the whole community and their needs. Consultation with little input for whatever reason is unlikely to lead to good outcomes. The views of new residents, old residents, different employment types and household groupings, younger people and older people all need to be sought. That views may change with life stage should also be considered.

The community will want and deserve reports on whether the outcomes proposed are being achieved. As has been noted in the press, a review of use of Mr Fluffy blocks and other recent infill developments could be illuminating. I am aware of some very good examples of dual occupancies and multi-unit infills. Equally, I am aware of some very poor outcomes. It would be useful to see a full picture.

- There is an absence of any discussion or vision as to what sort of Canberra people want, might have or seek, other than perhaps energy conservation. An approximation of the 60s style suburban design seems now to be only possible in NSW with the ACT increasingly being dominated by large towers for new builds. Sensitively designed, no more than three story small townhouses could fill a middle gap. Older suburbs were designed around walkable neighbourhoods, restricted lines of site and redirection of traffic away from homes. This could still be maintained with creative streetscapes. New suburbs have more large straight lines and grids and road crossings for pedestrians and cyclists. The 'towns' separated by wooded ridges is being retained, but the liveability of the urban spaces within will suffer without careful consideration to public and social amenity, not just numbers of buildings.

There should be scope for enhancing town centres like Woden rather than concentrating all development in an increasingly inaccessible Civic. Woden, although having medical facilities servicing the whole of Canberra and a CIT is lacking cultural and sports facilities of larger size. There is an opportunity to create distinctly different town centres. Different demographics may throw up different goals. The only model which achieves this in part is the distinct and planned Arrondissements or Quartiers of Paris.

Social consequences of planning choices made now have long term impacts. What does connected, sustainable suburb mean? Interconnected neighbourhoods with minimal road crossings, easy access to open space and natural settings, a place with a sense of belonging, community facilities within the community would seem desirable. An awful lot of coffee shops if Braddon or Kingston Foreshore surrounded by tower block is the model which seems to be suggested by the illustrations. Liveable suburbs require clever and enforced planning and observing actual behaviour. Canberra in the 60s made sense then but for now we need something different. I am not sure what we can learn from others European models are problematic in part due to different climates and the history of apartment living. They do though seem to be doing tree lined connecting corridors well. Maybe there are some things Melbourne, or the inner west of Sydney has done well. Traffic taming within those suburbs seems to have been a success. Large country towns do well with relatively low-cost community facilities.

Active travel. Lots of good ideas but without good integration with public transport it is problematic in parts. Even mildly disabled, the elderly or parents with toddlers may find a 20-minute walk plus to transport connections just too hard. Say for a swimming pool, it could be 20 minutes each end to public transport plus waiting time plus 30 to 40 minutes travel time, say 70- or 80-minutes travel for a 40-minute swim (plus rigid and infrequent transport timing) is off putting. Frequent more ubiquitous fast public transport is necessary. Multiple connections make using public transport slow and Uber or taxi quite expensive. Easy access to public transport around destinations is also necessary. It's a long walk between the three parts of Civic (Acton, Braddon and East), similarly Woden to Phillip. Scooters do not suit everyone. Frequent loop buses seem essential.

- Apparent lack of coordination of urban planning, economic planning, environmental planning, social planning and infrastructure design. Recent data on population for the ACT are confusing. Treasury data has Woden and Tuggeranong essentially stagnant yet planning indicates major potential increases in both. Families living in towers are going to need more open space, playgrounds, sports fields and schools, not less open space. The schools in many areas are at or near capacity now. Increasing the size of schools is not the answer. The research literature suggests that a primary school of no more than 600 students is optimal for educational, social and community outcomes while still being cost effective. Reopening currently closed schools and new schools is becoming necessary. More local schools may limit the congested school drop and pick up and build community. This in turn will mean finding alternative locations for the current community activities using old school sites.

Civic, Woden and Belconnen are dominated by large commercial shopping malls. If the United States is any example, shopping behaviour is changing, and malls are declining. Can opportunities to change the use of these now private facilities in a coordinated way rather than just leave it to commercial developers to seek the best return for themselves be explored?

It's not clear that the capacity of old sewerage and stormwater infrastructure is being reviewed in the context of increased hard ground cover, increased population and climate changing bringing more extreme events.

Aside from some new street trees with new developments and street tree renewal efforts it's hard to see tree cover and heat sink targets being met. Retention of old eucalypts is more important than ever. The trees in parklands and streets are just becoming old enough at 60 years to support tree holes for parrot breeding. If these trees are removed the parrots so typical of Canberra including rarer Gang Gangs will be gone.

- Non-commercial community and social infrastructure need more attention. If development and large homes on small blocks is to become the standard, the traditional backyard for kids and hobbies is gone. Setting aside nostalgia (backyard cricket can be played on open space without losing balls and windows), kids who can't dig a hole, climb a tree, build a bike track or build a cubby or billy cart are going to have a very different set of life skills to those who can. Computer games and Lego are fine, but not all the time when it's not a blizzard outside. With tower blocks and kids, more diverse open space, formal playgrounds, informal play areas and community gardens may be needed. I am not sure that the current open space usage predicts future usage and using many current reallocations of informal open space as sites for high density development may be an unwise trade-off. I note the problems of playgrounds and access in Molonglo.
- The ACT plan needs to enshrine a comprehensive environmental vision beyond energy conservation. The ACT has done well with Namadgi, the ridges are reasonably well preserved, regional cooperation is evident in the Murrumbidgee Corridor and connecting creeks like Ginninderra. More though could be done about connecting corridors across the urban area using the greenways. There are still opportunities to maintain rural to urban links through renaturalising some greenways, power line easements and suburb separations to low maintenance grasslands. Various community groups are giving it a go and there is a good example in Weston Creek.

Protecting and improving the blue-green links and providing shade is an important goal. Urban to rural vegetation corridors are necessary for ecosystem function, opportunities for naturalising low maintenance open space exist. It would significantly diminish Canberra's character as housing in an open woodland surrounded by forested hills. This should be able to be managed with increasing densification.

There is also an opportunity to work with NSW on east west connectivity from the inland to the coast and mountains to the sea. With climate change these corridors are likely to be very important for birds, plants and insects and other key species and pollinators such as flying foxes. Any development to the west of Canberra's current boundaries should be sensitive to adequate vegetation corridors to the Murrumbidgee. Rural environmental linkages in the ACT are important.

- Cross-border cooperation is important. The ACT cooperates with NSW on many things such as medical, education and emergency services. Greater cooperation and coordination on housing development is also important. Could we make better combined use with Queanbeyan of broad area low intensity land uses such as showgrounds and racecourses for example. ACT residents seem to share differentiated Queanbeyan cultural facilities such as theatres effectively.

ACT residents look to NSW for certain types of accommodation such as rural residential, big blocks and cheaper units. Unconstrained rural residential land use in NSW driven by the Canberra economy is not a good environmental outcome or energy use perspective. These negatives in turn impact on the ACT. Environmentally the ACT is not an island, merely an administrative boundary in the south-east region containing some unique grassland, water and alpine landscapes. Planning with NSW needs to be coordinated to deliver good outcomes.

## **Woden Valley Issues**

- The Woden Valley is the oldest satellite town with a large and planned larger population, (56 000 by Treasury projections, much larger if all developments take place) but aside from hospitals and a CIT it lacks public aquatic facilities, an indoor sports venue and a community arts centre. Its servicing an even larger population if the south Canberra, Weston community populations are considered. A country town of similar size would have these services. Clubs are not public facilities. Although they provide some community services, they behave like businesses to serve the interests of their members. Not everyone is a member or represented by their boards. The existing pools seem very crowded. Stromlo is closed five days a week for February and March for school carnivals. Civic has a high squad training load. Swimming classes are full. Indoor sports like basketball have waiting lists and people chasing kids across multiple venues. Public transport to more distant centres is not good. There would appear to be room around Woden for such facilities if imaginative use is made of the space available.
- Radburn planning has worked. Access to school, shops, foot and bicycle path informal play areas, and bird corridors are valuable. It provides a connected community.
- It is not clear what sort of commercial properties or residential buildings could be placed in the current Woden roundabout. Access will be difficult unless roads are removed which will affect whole of valley accessibility plus the area is flood prone and likely to get worse with more hard ground cover and intense storms.
- Phillip redevelopment seems all about housing. Are Woden services to be in future all found at Fyshwick or Greenway? There is an opportunity to plan a progressive change in the shape of Phillip to meet new needs, housing, commercial, entertainment, small offices and shopping. Like as is happening in local suburban shopping centres Phillip may be desirable for small business shopfronts. It is not clear what is the proposed fate of the car yards. Technology change over 20 years may render them less unnecessary due to leasing and online purchase and the like. It would be unfortunate if they were all to become tower blocks. If the car yards go, they may go together, and an almost greenfield development become possible. Some planning oversight is likely to deliver a better outcome than short term and individual owner or developer priorities.
- The Woden Valley due to geography experiences a relatively high background traffic noise level (enough to make outdoor sound recording hard) during parts of day. Mature tree cover in the suburbs, along major roads (and it extends to the Tuggeranong Parkway) and along Yarralumla Creek can mitigate this, but it needs mature trees to be retained.

- Renaturalising Yarralumla Creek is a good idea, but it will have to be done carefully. Wetlands and trees need space, new developments in the corridor may diminish and environmental value and water quality.
- The ridge between Curtin and Lyons and the back of Chifley leading to Mount Taylor is a significant area of native vegetation. It could do with vegetation restoration and linked to retained vegetation in the Molonglo Valley.
- The strategy presents the Theodore St Curtin, Daana Restaurant/corner store site as a local centre like Hughes or Lyons. Its not. It's never been more than one commercial premises on a slightly larger than normal block. It is not appropriate to plan for it in the same way as the Lyons shops.
- I also note that the draft map for the Woden district shows an area for urban intensification investigation along the green-blue link east of Carruthers Street. This is currently schools, aged care high density housing and a works depot. There is possibly some scope for some additional in character development on the existing footprint around the works depot and old scout hall, but the schools are already cramped and will continue to be needed in the future. Any development seems counter to planning for the areas as a blue green link. If it is to occur in a limited way, it should not be to the detriment of the greenway. This proposal is not repeated on the map in the summary plan. Instead, this shows an investigation area between McCulloch Street and Yarralumla Creek. What is intended here. should be made clear.
- A new street along Yarralumla Creek is not needed to create a formal edge. The greenway and Creek do this. Essentially, this area is an exterior Radburn feature with a soft boundary, vegetation and bike paths. It concerns me that if this area needs a vehicular boundary do all the internal Radburn soft edges and greenways need to two extra formal edge roads? I hope not. If the road is intended to provide better access to possible multi-unit developments along Allen and Holman Streets, more creative use should be made of the existing cul de sacs (without making them all through streets) and the battle axe block access. There is no need for high-speed roads. Other the few through roads the majority of Curtin Streets have low speed traffic and able to be shared with pedestrians.
- The greenfield sites on the Curtin Horse Paddocks and adjacent north of Yarralumla Creek land provide an opportunity for sustainable densification. It could be done better than the Weston new development adjacent and below the Tuggeranong Parkway with its grid, very built up footprint, hard edges and little room for vegetation. Retention of mature trees, taking advantage of renaturalising of the Creek and providing pedestrian and cycle access to existing services in Curtin and Yarralumla is important. Additional walking/cycle paths across the Creek would be necessary.
- A new vehicle crossing of Yarralumla Creek is undesirable and would be a significant degradation of community amenity, increasing noise, 'rat running' and local neighbourhoods foot traffic connectivity. When Yarralumla Creek is renaturalised an additional road crossing will diminish the benefits significantly.

## Submission

[REDACTED]

Bikes: Northbourne avenue should have a much wider bike lane that could fit 2-3 bikes riding abreast. Similar bike lanes and tracks should be available everywhere in Canberra.

Public Transport: There should be a commitment that nowhere in Canberra should be more than 45 minutes travel using public transport to any other point in Canberra, and that every suburb should have access to a public transport services that takes less than 30 minutes to get to the CBD or a major centre like Woden, Belco or Gunghalin.

Walking: The CBD should be car free on Sundays, Bunda street should be completely closed to traffic and parking in the CBD should be reduced to encourage people to use public transport to get into the CBD.

Biodiversity: Canberra should ban all farming within the city area and convert all of this to habitat for indigenous animals, with appropriate measures for land management in consultation with local First Nations People.

Kind regards,

[REDACTED]