

2026

**THE LEGISLATIVE ASSEMBLY FOR THE
AUSTRALIAN CAPITAL TERRITORY**

ELEVENTH ASSEMBLY

Territory Priority Project Declaration Inner South Health Centre

**Presented by
Chris Steel MLA
Minister for Planning and Sustainable Development
February 2026**

Mister Speaker, I and the Chief Minister have recently declared the Inner South Health Centre development proposal as a Territory Priority Project (TPP) under section 218 of the Planning Act 2023 (the Planning Act). Located at Blocks 33, 34 and 39 Section 78 Griffith, the proposed development will provide more affordable and accessibly health care to Canberrans closer to home.

The proposed health centre is anticipated to deliver community-based and multidisciplinary health care including Rapid Access Clinics, Chronic Disease Management, Post-Acute Care, Specialist Dental Services, ACT Pathology, BreastScreen ACT, Allied Health Clinics, virtual care and rehabilitation support.

The development proposal satisfies the relevant criteria contained in Planning Act, including that it:

- would achieve a major government policy outcome that is of significant benefit to the people of the ACT;
- would substantially facilitate the achievement of the desired future planning outcomes set out in the planning strategy, a relevant district strategy, the territory plan or any relevant zone;
- is for significant infrastructure, or significant facilities, that are of significant benefit to the people of the ACT; and

- has been the subject of sufficient consultation.

The proposed TPP declaration proceeded to public consultation concurrently with the associated Draft Major Plan Amendment for the site – DPA-06 which seeks to rezone the site to a Community Facility Zone.

In accordance with section 218(3)(b) of the Act, proposed TPP declarations are required to be released for public consultation for a minimum of 15 working days.

Mister Speaker, this TPP declaration with DPA-06 were released for public consultation between 7 October 2025 to 19 November 2025. And in response to feedback from the community, late comments were accepted until 10 December 2025. This represents a period of 45 working days, some three times longer than the period required under the Planning Act.

A total of ten (10) written comments on the proposed TPP declaration were received during the consultation period. Comments were raised on the proposed TPP declarations strategic merit and alignment with the statutory criteria, as well as matters regarding the TPP process generally including loss of third party appeal rights and consultation processes.

As outlined in the tabled documents, the development proposal meets all the statutory criteria in the Planning Act – specifically, it will provide much needed health facilities closer to where people live. In turn this will help:

- reduce wait times for appointments at Community Health Centres or home-based visits;
- allow for efficient staff ration and skill mix for high quality and safe service provision;
- increased staff sustainability, retention and training opportunities; and
- enhanced consumer and staff safety.

Comments received during the consultation period have been considered prior to the Chief Minister and I making this TPP declaration. A summary of comments received and responses are provided in the tabled documents.

We are now presenting the TPP declaration to the Legislative Assembly, in accordance with section 219 of the Planning Act.

The TPP declaration commences only after the declaration is approved by the Legislative Assembly or, should no decision to reject the declaration be made, two sitting days after it is presented. Following this, the TPP declaration will be notified on the Territory

Planning Authority's website. A development application for the development proposal can only be submitted after the declaration commences.

Territory Priority Project Declaration and Statement of Reasons

Inner South Health Centre

Background

The ACT Government has committed to delivering four new health centres across the Territory to provide more affordable and accessible health care to Canberrans closer to home. Blocks 33, 34 and 39 Section 78 Griffith has been identified as the location for the new Inner South Health Centre. The location of the proposed health centre is shown in Figure 1.

The proposed health centre is anticipated to deliver community-based and multidisciplinary care including Rapid Access Clinics, Chronic Disease Management, Post-Acute Care, Specialist Dental Services, ACT Pathology, BreastScreen ACT, Allied Health Clinics, virtual care and rehabilitation support.

The purpose-built facility will accommodate approximately 50 staff and provide approximately 119 car parking spaces and associated works across the 9,175m² site. Figure 2 shows the proposed location and indicative site plan.

Territory Priority Project Declaration Process

The proposed Inner South Health Centre was identified as a Territory Priority Project (TPP) under section 218 of the *Planning Act 2023* (the Act).

Infrastructure Canberra (iCBR) on behalf of the ACT Government submitted a request for a TPP declaration to me as Minister for Planning and Sustainable Development on 5 September 2025.

The proposed TPP declaration proceeded to public consultation in accordance with s218(3)(b) of the Act from 7 October 2025 to 19 November 2025. Late comments were accepted until 10 December 2025. A total of ten (10) written comments were received during the consultation period and have been considered prior to this TPP declaration being made.

In accordance with s218(3)(b)(iii) of the Act, we consulted with the NCA in relation to the proposed TPP declaration during the public consultation period.

Further details about public consultation on this proposal is available [here](#).

Therefore, the proposal is considered to have met the requirement contained in s218(1)(d) of the Act (the proposal has been the subject of sufficient consultation under subsection (3)).

In late December 2025, section 218 of the Act was amended by the *Planning (Territory Priority Projects) Amendment Act 2025*. The amendments included the introduction of requirements to consult with the Conservator of Flora and Fauna (the Conservator) and the ACT Heritage Council (the Heritage Council) in some cases. Comments on the proposed Inner South Health Centre were received from the Conservator, who noted any impacts to ecological matters or protected trees can be appropriately considered through other statutory processes, including the subsequent development application.

Draft Major Plan Amendment

The Inner South Health Centre development proposal also requires a major plan amendment to the Territory Plan to proceed.

More information about the associated draft major plan amendment (DPA-06) is available [here](#).

Assessment against TPP declaration criteria and statement of reasons

The proposal has been assessed against the TPP declaration criteria contained in s218(1) of the Act (Table 1) and I am satisfied that the Inner South Health Centre:

- would achieve a major government policy outcome that is of significant benefit to the people of the ACT;
- would substantially facilitate the achievement of the desired future planning outcomes set out in the planning strategy, a relevant district strategy, the territory plan or any relevant zone;
- is for significant infrastructure, or significant facilities, that are of significant benefit to the people of the ACT; and
- has been subject to sufficient consultation.

Table 1 – Assessment against TPP declaration criteria - s218(1) and statement of reasons for the declaration - s219(b) of the Act

Criteria contained in s218(1) of the <i>Planning Act 2023</i>	Assessment and statement of reasons for making the declaration s219(b)
The proposal would achieve a major government policy outcome that is of significant	The proposal will support care closer to home, improve access to healthcare for vulnerable populations, and align with ACT

benefit to the people of the ACT	Government commitments to decentralised, preventative health care. The proposed Inner South Health Centre is one of four new health centres committed to by the ACT Government. Investment for construction of the Inner South Health Centre was included in the ACT Budget 2025-26. The proposal aligns with key ACT Government health policy objectives, including: • Our 2024 election commitments • ACT Health Services Plan 2022–2030 • Canberra Health Services Strategic Plan 2024–2029 • ACT Health Infrastructure Plan • ACT Wellbeing Framework • iCBR infrastructure Strategic Plan 2025-27
The proposal would substantially facilitate the achievement of the desired future planning outcomes set out in the planning strategy, a relevant district strategy, the territory plan or any relevant zone	The proposed Inner South Health Centre strongly aligns with the strategic directions contained in the ACT Planning Strategy, including: • Compact and Efficient City: Utilises existing urban land near rapid transit routes. • Diverse Canberra: Enhances inclusive access to health services and supports local employment. • Sustainable & Resilient Territory: Delivery of essential health infrastructure on central, well-located urban land within close proximity to active travel and public transport networks. • Liveable Canberra: Provides essential health infrastructure in a walkable, well-connected location. • Accessible Canberra: Located on a rapid transit route, promoting active and public transport use. The proposal is consistent with the desired future planning outcomes contained in the Inner South District Strategy, including delivering a new Inner South Health Centre by the middle of the decade and increasing the availability of accessible public health care in the district. The proposal is consistent with policy outcomes contained in relevant sections of the <i>Territory Plan 2023</i> (the Territory Plan), including the Inner South District Policy Outcome 9 to deliver new community infrastructure to meet district demand. The proposal also aligns with the Territory Plan’s Community Facility Zones Policy including policy outcome 1 to facilitate social sustainability and inclusion through providing accessible sites for key government and non-government facilities and services for individuals, families and communities.
The proposal is for significant infrastructure, or significant facilities, that are of significant benefit to the people of the ACT	The proposed Inner South Health Centre is considered to be a significant health infrastructure project that will offer a wide range of health services tailored to community needs. The 9,157m² site will accommodate approximately 50 staff and provide 119 car parking spaces.

	Additional benefits to the people of the ACT include: • reduction in wait times for appointments at Community Health Centres or home-based visits; • efficient staff rations and skill mix for high quality and safe service provision; • increased staff sustainability, retention and training opportunities; and • enhanced consumer and staff safety.
Has been the subject of sufficient consultation under subsection (3)	The proposed TPP declaration proceeded to public consultation in accordance with s218(3)(b) of the Act from 7 October 2025 to 19 November 2025. Late comments were accepted until 10 December 2025. The proposed TPP declaration was released concurrently with the associated Draft Major Plan Amendment (DPA-06). Details of public consultation were published on the Authority's website along with the proposed declaration, DPA-06, the supporting report and background papers. A total of ten (10) written comments were received during the consultation period and have been considered prior to this TPP declaration being made.

Declaration

The Chief Minister and I are satisfied that the proposed Inner South Health Centre development proposal meets the criteria contained in s218(1) of the Act.

Therefore, under s218(1) of the Act, the Chief Minister and I declare that the proposed Inner South Health Centre development proposal is a TPP.

Chris Steel MLA
Minister for Planning and Sustainable Development
Click or tap to enter a date.

Andrew Barr MLA
Chief Minister
Click or tap to enter a date.

Next Steps

I will present this TPP declaration to the Legislative Assembly. Following this, the Legislative Assembly may, within 2 sitting days, approve or refuse the TPP declaration. If the Assembly does not pass a resolution in that timeframe, the declaration is taken to be approved.

The TPP declaration will commence only after it is approved by the Legislative Assembly and publicly notified. Subsequent DAs can only be submitted for the TPP after the declaration commences.

Further information on the TPP process, including impacts on the associated MPA and any future development application for the Inner South Health Centre development proposal, can be found on the ACT Planning website [here](#).



ACT
Government

**Territory
Planning**
Authority

CONSULTATION SUMMARY

Territory Priority Project Declaration

**Inner South Health Centre
Blocks 33 and 39 Section 78 Griffith**

January 2026

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1.0 INTRODUCTION

1.1 Purpose

This document details the outcomes of public consultation the Territory Planning Authority (the Authority) has undertaken on behalf of the Minister for Planning and Sustainable Development (the Minister) for the proposed Territory Priority Project (TPP) declaration for the proposed Inner South Health Centre at Blocks 33 and 39 Section 78 Griffith (the site).

To facilitate the proposed development of the Inner South Health Centre on the subject site, a draft major plan amendment to the Territory Plan is also required. Draft Plan Amendment 06 (DPA-06) proposes to amend the Territory Plan map to rezone the site to CFZ Community Facility Zone to enable the development of a health facility on the site. It should be noted that this Consultation Summary addresses comments made on the TPP declaration only.

Pursuant to section 218 of the *Planning Act 2023* (the Planning Act), this document includes comments on the proposed TPP declaration provided by the National Capital Authority (NCA) to the Authority.

This document should be read in conjunction with the proposed TPP Declaration that has been given to the Minister which is available on the Planning [website](#).

Key parts of this document are:

- section 2 – outlines consultation with the NCA
- section 3 – outlines comments received from the public

1.2 Outline of process

Infrastructure Canberra (iCBR) on behalf of the ACT Government submitted a request for a TPP declaration to the Minister on 5 September 2025.

The proposed Inner South Health Centre was subsequently identified as a potential Territory Priority Project (TPP) under section 218 of the Planning Act and was to the Authority for consideration on 8 September 2025. The proposed TPP was open for consultation from 7 October 2025 to 19 November 2025 (with late comments accepted until 10 December 2025).

The proposed TPP declaration proceeded to public consultation concurrently with DPA-06. More information about Draft Major Plan Amendment 06 (DPA-06) is available [here](#).

2.0 CONSULTATION WITH THE NATIONAL CAPITAL AUTHORITY

In accordance with s218(3)(b)(iii) of the Planning Act, the Authority has consulted with the NCA on behalf of the Minister in relation to this proposed TPP declaration during the public consultation period.

The NCA noted that the site is within the Urban Areas of the National Capital Plan, confirmed that the proposed project is not inconsistent with the National Capital Plan and that they have no objections with the proposed development.

3.0 CONSULTATION WITH THE PUBLIC

3.1 Consultation

In accordance with s218(3) of the Planning Act, before making a TPP declaration the proposed declaration and associated documentation was published on the Authority website.

As the Inner South Health Centre development proposal requires a major plan amendment to proceed, the material published on the website included a description of the amendment and the associated supporting report.

Written comments about the proposed declaration were invited between 7 October 2025 and 19 November 2025, with late comments accepted until 10 December 2025 (a period of 45 working days). This exceeds the minimum 15 working day consultation period required by the Planning Act.

3.2 Comments

A total of ten (10) written comments were received on the proposed TPP declaration during public consultation. This included four (4) late comments received during the extended consultation period. 8 comments were from individuals, and 2 comments were from community groups.

It should be noted that the proposed TPP declaration was open for consultation concurrently with DPA-06. This Consultation Summary addresses comments made on the TPP declaration only.

3.3 Summary of comments

3.3.1 Support for the proposed TPP declaration

Several comments expressed support for the proposed Inner South Health Centre as a proposed TPP due to its alignment with the TPP criteria, including the strategic direction of key planning documents. The submissions also stated that the proposed development is of significant benefit to the community, providing key health infrastructure that is well located and aligned to population growth.

Response
Noted.

3.3.2 Alignment with Criteria

Several comments stated that the proposed Inner South Health Centre does not meet all of the criteria contained in s218 of the Planning Act, including that it is not considered significant infrastructure, or significant facilities, that are of significant benefit to the people of the ACT.

Response

The Authority has assessed the request for a proposed TPP declaration against the criteria under s218(1) of the Act. Based on the assessment of the proposed TPP, the Authority considers that the Inner South Health Centre:

- would achieve a major government policy outcome that is of significant benefit to the people of the ACT;
- would substantially facilitate the achievement of the desired future planning outcomes set out in the planning strategy, a relevant district strategy, the territory plan or any relevant zone; and
- is for significant infrastructure, or significant facilities, that are of significant benefit to the people of the ACT.

The Authority considers the Inner South Health Centre to be a significant health infrastructure project that will offer a wide range of health services tailored to community needs. The facility will provide several benefits to the people of the ACT, including:

- assisting to reduce wait times for appointments at Community Health Centres or home-based visits;
- helping provide efficient staff rations and skill mix for high quality and safe service provision;
- increased staff sustainability, retention and training opportunities; and
- enhanced consumer and staff safety.

3.3.3 Dissatisfaction with TPP Process

General dissatisfaction with the TPP process was raised in comments objecting to the proposed TPP declaration. Concerns included that the process lacks procedural fairness and transparency.

Response

This is noted as a general comment on the TPP process, rather than a concern about a potential TPP declaration for this development proposal.

Notwithstanding this, the TPP declarations process is one that is heavily guided by the Planning Act which has several points where information is made publicly available, including for comment. For example, public comments made during the consultation period are considered prior to any declaration being made (as highlighted in this consultation summary). Following any TPP declaration, it is then presented to the Legislative Assembly where MLAs have the ability to approve or refuse it. The TPP process also does not remove judicial review rights through the Supreme Court.

3.3.4 Loss of Third Party Appeal Rights

Concerns were raised about the TPP process as it relates to exempting projects from ACT Civil and Administrative Tribunal (ACAT) appeals and the loss of democratic rights. Comments suggested that through the TPP process, the government is attempting to pre-emptively silence legal challenges and avoid further meaningful consultation with the community.

Response

A TPP status reflects the importance of applicable development proposals. It is noted that the effect of the TPP status is that a subsequent DA is then exempt from third party appeal in the ACAT.

A TPP declaration can only be granted where a development meets the criteria outlined within the Planning Act – it is not a decision that can be made completely subjectively and independently. In this instance, the Inner South Health Centre it is considered to meet the criteria in the Planning Act.

It should also be noted that a TPP declaration does not impact the subsequent DA process, which includes public notification. The declaration also does not remove judicial review rights through the Supreme Court, whether that be on the TPP declaration decision, a DA, environmental impact statement or similar.

3.3.5 Entity Advice

Comments raised that TPP status allows the Chief Planner to depart from advice from other entities like the Conservator of Flora and Fauna, potentially undermining protections for registered trees and other environmental assets on the site.

Response

During the public consultation period for the proposed TPP Declaration, there was no statutory requirement for consultation with entities as part of the TPP process. In line with the Planning Act, DPA-06 was circulated during public consultation to all relevant ACT Government entities in other directorates for comment.

The NCA was invited to comment on the proposed TPP declaration during the public consultation period, as required by the Planning Act (refer to section 2.0).

Any decision on a subsequent DA, which is yet to be lodged, will be made based on the merits of the proposal and in line with the requirements of the Planning Act.

3.3.6 Public Consultation Process

Some comments expressed dissatisfaction with the TPP consultation process, raising concerns regarding the consultation timing and the extent of community outreach.

Requests were made to extend the consultation period for DPA-06.

CONSULTATION REPORT – DPA-05 – APPENDIX 3

Response

In accordance with s218(3) of the Planning Act, a proposed TPP declaration is subject to a minimum of 15 working days of public consultation. The proposed TPP declaration for the Inner South Health Centre was open for public consultation concurrently with DPA-06 for an initial period of 30 working days from 7 October 2025 to 19 November 2025.

In accordance with the Planning Act, the Minister published a notice on the TPA website stating that copies of the proposed declaration were available on the website and invited people to give written comments about the proposed declaration to the Authority at a stated address during the consultation period.

In response to concerns raised by the community regarding the timing of Consultation on DPA-06, the Authority accepted late comments until 10 December 2025 on DPA-06 and the proposed TPP declaration. This effectively extended the consultation period for this proposal to 45 working days.

INTERPRETATION SERVICE

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Punjabi / ਪੰਜਾਬੀ	ਜੇਕਰ ਤੁਹਾਨੂੰ ਵਿਸ਼ੇ ਦੁਆਰੀਏ ਦੀ ਲੋੜ ਹੈ ਤਾਂ ਕਿਰਪਾ ਕਰਕੇ ਫੋਨ ਕਰੋ: 13 14 50
Tamil / தமிழ்	உங்களுக்கு மொழிபெயர்த்துரைப்பாளர் ஒருவர் தேவைப்பட்டால் 13 14 50 என்ற எண்ணை அழைக்கவும்
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Karen / ကညီကျိာ်	ဖဲန့မ့ၢ်လိာ်တၢ်ပုၤကတိၤကျိးထံတၢ်တၢ်အခါဝံသးစူၤကိးတၢ်-၁၃၁ ၄၅၀ တက့ၢ်.

Telephone and Interpreter Service 13 14 50 - Canberra and District - 24 hours a day, seven days a week

[REDACTED]

From: [REDACTED]
Sent: Friday, 7 November 2025 7:37 AM
To: Terrplan
Subject: The Northside Hospital Project and Inner South Health Centre

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Caution: This email originated from outside of the ACT Government. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear TERPLAN

Thank for submitting proposal and inviting public consultation.

With regard to the Northside Hospital Project and Inner South Health Centre citizens using and visiting both will be experiencing enough stress already due to medical and likely mental/emotional stress and and financial stress with medical costs.

Both buildings should provide ample car park spaces close by (not only for disabled but for all) , at no cost to the patients and their families and friends who visit and are most important support at times like these to the citizens needing use of the facilities.

Having another stress for needing to find a car park near by , then having to pay for that car park, places added stress and is not supporting citizens or showing humanity.

Kind regards

[REDACTED]

[REDACTED]

From: [REDACTED]
Sent: Sunday, 16 November 2025 11:08 AM
To: Terrplan
Subject: Written comments: DPA-06 and TPP Declaration for the Inner South Health Centre
Attachments: TPP Objection - DPA-06 Inner South Health Centre - Griffith - [REDACTED]
DPA-06 Inner South Health Centre - Griffith - [REDACTED]

Categories: [REDACTED]

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Good morning,

Please find attached two submissions relating to:

1. The Draft Plan Amendment 06 – Inner South Health Centre – Blocks 33 and 39 Section 78 Griffith (DPA-06); and
2. The proposed Territory Priority Project (TPP) Declaration for the Inner South Health Centre.

Could you please confirm receipt of the attached submissions by responding to this email?

Regards,
[REDACTED]

11 November 2025

ATTENTION:

Territory Plan and Coordination Section, CED
Access Canberra Building Services Shopfront

Dear Sir/Madam,

RE: Formal Objection to the Proposed Territory Priority Project Declaration of the Inner South Health Centre – Griffith

I am writing to formally object to the proposal that the Inner South Health Centre (ISHC) on Blocks 33, 34, and 39 Section 78, Griffith is declared a Territory Priority Project (TPP).

While I fully support the ACT Government's commitment to developing an Inner South Health Centre, the development at the proposed location does not align with the ACT Government's Inner South District Strategy (2023), would erode the character of Griffith, and result in substantial loss of Green Space for the local community.

My submission details specific objections across four distinct categories: location, parking and transport objections; Green space and character protection; Alternative sites; and Procedural failure and lack of transparency.

As such, I do not support the proposal that the ISHC is declared a TPP for the reasons outlined below.

Territory Priority Project:

The declaration of the Inner South Health Centre as a Territory Priority Project is an unnecessary and damaging procedural step that should be reserved for genuinely critical, large-scale infrastructure and emergencies, not beneficial community projects that can follow standard planning procedures.

- The TPP declaration is procedurally damaging because it removes third-party appeal rights (ACAT merits review), thereby undermining fundamental democratic planning rights. This is especially concerning given the ACT Government is already aware of the community's substantial opposition, specifically regarding the inadequate parking provisions and requested planning deviations, as documented in the 'What We Heard Report.' By seeking TPP status, the government is creating the appearance that it is attempting to pre-emptively silence legal challenges and avoid further meaningful consultation with the very community the facility is intended to serve.
- The declaration would facilitate a Draft Major Plan Amendment (DPA-06) to rezone Blocks 33 and 39 Section 78 from the current Urban Open Space (PRZ1/PRZ2) to a Community Facility Zone (CFZ). This sets a negative precedent for using local public open space, which is scarce and highly valued, for new facility development, rather than prioritising existing or brownfield community-zoned land.
- While the Health Centre is a beneficial project, it lacks the "exceptional" justification for expedited status. It is not an emergency response or critical infrastructure where delays would cause massive territory-wide detriment, meaning the TPP mechanism is being misused.

- TPP status allows the Chief Planner to depart from advice from other entities like the Conservator of Flora and Fauna, potentially undermining protections for registered trees and other environmental assets on the site.
- The Proposed Territory Priority Project Declaration contains contradicting statements when assessing the ISHC against the criteria of s218(1) of the Planning Act⁵. Specifically:
 - At item (b), the ACT Government suggests that the proposal "strongly aligns with the strategic directions contained in the ACT Planning Strategy" and is "consistent with the desired future planning outcomes contained in the Inner South District Strategy". However, the indicative site plan and the proposed plan are inconsistent with the Inner South District Strategy by:
 - The inclusion of an out-of-character, concrete, elevated parking structure. This element is grossly inconsistent with the established leafy, low-scale character of the surrounding environment and directly contradicts the principles outlined in the ACT Urban Design Guides. It also demonstrates how the ACT Government is attempting to fit an inappropriate infrastructure project on a site too small for its purpose.
 - The indicative plan also does not include appropriate tree coverage in the proposal's flatbed concrete parking.
 - Deviates from parking requirements (addressed below). The removal of valued green space reduces the canopy cover, which is inconsistent with the strategy.
 - At item (c), the ACT Government confirms the proposal is for a significant facility on a 9,175m² block that will accommodate approximately 50 staff and provide 119 car parking spaces. However, the assessment fails to address how the quoted parking provisions (119 spaces) deviate from the ACT Government's own planning requirements of 4 car spaces per practitioner. To progress to TPP would allow the ACT Government to deviate from the planning requirement it establishes.

Inappropriate Location, parking and transport objections:

The proposed ISHC location is opposed due to **severe parking and transport deficiencies** and its fundamental incompatibility with the local area's character and infrastructure.

The decision to site a health centre, where the intention is to serve inner south of Canberra in the middle of a suburban community is contrary to established Urban Design Guidelines and the ISHC intention. Such major facilities, designed to serve the broader Inner South community, should be located on **major arterial roads** to ensure accessible healthcare without relying on residential streets for commuter traffic.

- The plan proposes only **2.23 parking spaces per 28 practitioners¹**, a critical deviation from the Community Facility Zone (CFZ) recommendation of 4 spaces per practitioner. The Traffic Impact Assessment fails to provide any justification or evidence for this departure from CFZ planning guidelines. Based on the CFZ standard, the project should provide 112² new spaces. It must also compensate for the 56 existing overflow spaces being removed, which currently serve the Griffith Shops. This brings the total required parking provision to a minimum of 168 spaces.

¹ Traffic Impact Assessment Report, Appendix E: Proposed Development Plans

² 28 practitioners x 4 spaces/practitioner = 112 new spaces

The issue of sufficient, standards-compliant parking and the fundamental unsuitability of this residential location must be credibly resolved before this Plan Amendment or TPP status is progressed or approved.

- The proposed development, necessitated by the attempt to fit the Inner South Health Centre onto the current Griffith site, includes an **out-of-character, concrete, elevated parking structure**. This design element is grossly inconsistent with the established leafy, low-scale character of the surrounding environment and directly contradicts the principles outlined in the ACT Urban Design Guides³.
- The 'What We Heard Report'⁴ surveyed Inner South residents about desired services at the proposed ISHC, but the **feedback was clearly dominated by opposition to the proposed site**. Residents explicitly expressed concerns that the location was "not fit for purpose," "will ... not work," and that a Health Centre was not needed if it was at *that* specific location.
- Walter Burley Griffin's plan for Canberra placed 'village shops', such as the Griffith shops, in neighbourhood enclaves to address local needs. The selection and placement of these sites were, therefore, too restrictive in scope and are **ill-suited to serve the wide-ranging demands of the Inner South community**, which is the purpose of the Health Centre.
- To access the proposed site, **traffic will be pushed onto local residential streets and networks**. This will unnecessarily impact the residents and commuters accessing the ISHC from other suburbs.

Green Space, Character Protection and Height Restrictions:

The proposed rezoning of Blocks 33 and 39 Section 78 Griffith from Parks and Recreation (PRZ1 Urban Open Space Zone and PRZ2 Restricted Access Recreation Zone) to Community Facility Zone (CFZ) is opposed due to the resulting removal and destruction of valued green space and the subsequent erosion of the area's established Canberra character.

The development site includes a portion of a local park known as Throsby Park, which contains the Griffith Shops Playground. This green space is regularly accessed by local residents and is important for the community, native animals and birds. As the density of housing, including apartments and townhouses, increases in Griffith, existing green spaces become increasingly vital to the neighbourhood and community for providing accessible, local amenity.

The trees on the site are well-established native gum trees that provide sacred habitat for native wildlife and have been part of the Griffith landscape for generations. Given the ACT's identity as the "Bush Capital," there is clear inconsistency in this proposed development, which is intended to be keeping with the Inner South District Strategy that seeks to "capture and protect the valued character and attributes" of the district. Instead, this development will remove the green space that contributes significantly to the very character of Griffith and the Inner South. The proposed development is also inconsistent with the first of the five big drivers of the ACT Government's 2023 Inner South District Strategy that informs Territory Plan amendments.

³ ACT Urban Design Guide, page 32

⁴ https://yoursayconversations.act.gov.au/download_file/12156/3314

Alternative Sites – East Lake Place Plan:

The need for the Inner South Health Centre is undisputed; but its location must be suitable to serve the broader Inner South community and align with the ISHC's own objectives.

The ACT Government is simultaneously planning a large development known as 'East Lake,' which is proposed to include "residential and commercial mixed-use development...with opportunities for community facilities."⁵ As the ACT Government itself has noted, the East Lake area has been strategically important for urban growth and renewal since the 2004 Canberra Spatial Plan.

This makes the East Lake site a more appropriate location to house the ISHC, offering several significant advantages:

- It is already designated as a Community Facility Zone, eliminating the need for a major, contested rezoning and the compulsory removal of already limited public green space.
- The site is generally less constrained than the proposed Griffith site, involving fewer impacts on local character and heritage.
- Since the East Lake Place Plan is a broader development framework, integrating the Inner South Health Centre within it will ensure the facility's requirements are considered from the outset. This will enable the ACT Government to effectively address crucial factors such as parking provisions, character consistency and the need to incorporate the specific health services requested by the Inner South community.
- The site's location on major arterials (Canberra Avenue) and a commercial area will significantly limit the impact on Inner South residents, mitigating concerns related to light and noise pollution, security and building constraints.

The ACT Government should thoroughly review the proposed plan amendment in light of the East Lake Place Plan. Considering how the ISHC would be better suited to integrate into a site strategically planned for community facilities would reduce the impact on highly valued local green space in Griffith, preserve the character of the existing local centre, and significantly mitigate traffic and parking concerns.

Procedural Failure and Vague Information

The ACT Government's approach to the ISHC has demonstrated a significant lack of procedural fairness and transparency with the Inner South community. The consultation documents contain fundamental contradictions, undermining the public's ability to provide effective feedback.

The provided documentation is inconsistent and misleading. For example, the Joint Media Release dated 7 October 2025 hosted on the ACT Government website includes a direct quote stating: "...we know parking will be a significant consideration for the community and this is being taken into account in the design phase of the project."

Yet, the formal background documents supplied for public comment explicitly state that "detailed design considerations including car parking provisions will be addressed at the development application stage."

This contradiction is a major objection to the process. If parking is already being "taken into account in the design phase," then that design information must be disclosed. Conversely, if detailed design is

⁵ <https://yoursayconversations.act.gov.au/east-lake-place-plan#:~:text=The%20plan%20includes%20key%20highlights%20such%20as%2C%20around%20heritage%20buildings%20and%20precincts>

truly deferred, the public cannot be expected to provide meaningful feedback on the current rezoning proposal.

The public consultation process on the Draft Plan Amendment 06 (DPA-06) is fundamentally flawed because the amendment relates only to a zoning change, yet the accompanying background documentation provides specific, detailed development proposals. This includes:

- A Traffic Impact Assessment with modelling.
- An indicative site plan and design.
- Details on the number of practitioners proposed for the ISHC.
- A proposal for a deviation from existing planning guidelines.

By embedding these specific operational details within a consultation for a simple zoning change, the ACT Government has misled the community. The explicit statement that detailed design will be addressed later renders public comment on critical issues such as traffic, parking and building impact ineffective and immaterial to the current process. This lack of clarity and procedural integrity diminishes the value of the entire consultation process.

This lack of clarity and procedural integrity is profoundly disappointing, particularly as the Inner South Health Centre is intended to be a community facility, funded by the community and designed explicitly to serve the community. The current consultation process gives the unfortunate impression that the ACT Government is proceeding with a predetermined outcome while ignoring the input and legitimate concerns of the very community the facility is being designed to serve.

11 November 2025

ATTENTION:

Territory Plan and Coordination Section, CED
Access Canberra Building Services Shopfront

Dear Sir/Madam,

RE: Formal Objection to Draft Plan Amendment 06 (DPA-06): Inner South Health Centre – Griffith

I am writing to formally object to the proposed plan amendment, DPA-06, regarding the establishment of the Inner South Health Centre (**ISHC**) at the Griffith Shops site.

While I fully support the ACT Government's commitment to developing an Inner South Health Centre, the proposed site selection at Griffith is fundamentally inappropriate to service the broader Inner South and fails to align with the facility's strategic objectives.

My submission details specific objections across four distinct categories: Inappropriate Location, Parking and Transport Deficiencies; Green Space and Character Protection; Alternative Sites; and Procedural Failure and Lack of Transparency.

As such, I do not support the proposed plan amendment (DPA-06) or the associated development for the reasons outlined below.

Inappropriate Location, parking and architectural character objections:

The proposed ISHC location is opposed due to **severe parking and transport deficiencies** and its fundamental incompatibility with the neighbourhood architectural character.

The decision to site a health centre, where the intention is to serve inner south of Canberra in the middle of a suburban community is contrary to established Urban Design Guidelines and the ISHC intention. Such major facilities, designed to serve the broader Inner South community, should be located on **major arterial roads** to ensure accessible healthcare without relying on quiet residential streets for commuter traffic.

- The plan proposes only **2.23 parking spaces per 28 practitioners¹**, a critical deviation from the Community Facility Zone (CFZ) recommendation of 4 spaces per practitioner. It is inappropriate to benchmark other community health facilities to justify the parking ratio deviation if they are located on major arterial roads and with adequate public transport that reflects the catchment area for users, neither of which this facility has. The Traffic Impact Assessment fails to provide any justification or evidence for this departure from CFZ planning guidelines. Based on the CFZ standard, the project should provide 112² new spaces. It must also compensate for the 56 existing overflow spaces being removed, which currently serve the Griffith Shops. This brings the total required parking provision to a minimum of 168 spaces.

¹ Traffic Impact Assessment Report, Appendix E: Proposed Development Plans

² 28 practitioners x 4 spaces/practitioner = 112 new spaces

The issue of sufficient, standards-compliant parking and the fundamental unsuitability of this residential location must be credibly resolved before this Plan Amendment or TPP status is progressed or approved.

- The proposed development, necessitated by the attempt to fit the Inner South Health Centre onto the current Griffith site, includes an **out-of-character, concrete, elevated parking structure**. This design element is grossly inconsistent with the established leafy, low-scale character that is residential in character dominated by pitched roof forms both. As such, this design outcome directly contradicts the principles outlined in the ACT Urban Design Guides³.
- The 'What We Heard Report'⁴ surveyed Inner South residents about desired services at the proposed ISHC, but the **feedback was clearly dominated by opposition to the proposed site**. Residents expressed concerns that the location was "not fit for purpose," "will ... not work," and that a Health Centre was not needed if it was at that specific location.
- Walter Burley Griffin's plan for Canberra placed 'village shops', such as the Griffith shops, in neighbourhood enclaves to address local needs. The selection and placement of these sites were, therefore, too restrictive in scope and are **ill-suited to serve the wide-ranging demands of the Inner South community**, which is the purpose of the Health Centre.
- To access the proposed site, **traffic will be pushed onto local residential streets and networks**. This will unnecessarily impact the residents and commuters accessing the ISHC from other suburbs.

Green Space, Character Protection and Height Restrictions:

The proposed rezoning of Blocks 33 and 39 Section 78 Griffith from Parks and Recreation (PRZ1 Urban Open Space Zone and PRZ2 Restricted Access Recreation Zone) to Community Facility Zone (CFZ) is opposed due to the resulting removal and destruction of valued green space and the subsequent erosion of the area's established Canberra character.

The development site includes a portion of a local park known as Throsby Park, which contains the Griffith Shops Playground. This green space is regularly accessed by local residents and is important for residents, native animals and birds. As the density of housing, including apartments and townhouses, increases in Griffith, existing green spaces become increasingly vital to the neighbourhood and community for providing accessible, local amenity.

The trees on the site are well-established native gum trees that provide sacred habitat for native wildlife and have been part of the Griffith landscape for generations. Given the ACT's identity as the "Bush Capital," there is clear inconsistency in this proposed development, which is intended to be keeping with the Inner South District Strategy that seeks to "capture and protect the valued character and attributes" of the district. Instead, this development will remove the green space that contributes significantly to the very character of Griffith and the Inner South. The proposed development is also inconsistent with the first of the five big drivers of the ACT Government's 2023 Inner South District Strategy that informs Territory Plan amendments.

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⁴ https://yoursayconversations.act.gov.au/download_file/12156/3314

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The ACT Government is simultaneously planning a large development known as 'East Lake,' which is proposed to include "residential and commercial mixed-use development...with opportunities for community facilities."⁵ As the ACT Government itself has noted, the East Lake area has been strategically important for urban growth and renewal since the 2004 Canberra Spatial Plan.

This makes the East Lake site a more strategic and appropriate location to house the ISHC, offering several significant advantages:

- It is already designated as a Community Facility Zone, eliminating the need for a major, contested rezoning and the compulsory removal of already limited public green space.
- The site is generally less constrained than the proposed Griffith site, involving fewer impacts on local character and heritage.
- Since the East Lake Place Plan is a broader development, integrating the ISHC would allow for a coordinated review and integration of the facility, ensuring it comprehensively meets the needs of the Inner South community.
- The site's location on major arterials (Canberra Avenue) and a commercial area will significantly limit the impact on Inner South residents, mitigating concerns related to light and noise pollution, security, and building constraints.

The ACT Government should thoroughly review the proposed plan amendment in light of the East Lake Place Plan. Considering how the ISHC would be better suited to integrate into a site strategically planned for community facilities would reduce the impact on highly valued local green space in Griffith, preserve the character of the existing local centre, and significantly mitigate traffic and parking concerns.

Procedural Failure and Vague Information

The ACT Government's approach to the ISHC has demonstrated a significant lack of procedural fairness and transparency with the Inner South community. The consultation documents contain fundamental contradictions, undermining the public's ability to provide effective feedback.

The provided documentation is inconsistent and misleading. For example, the Joint Media Release dated 7 October 2025 [1] hosted on the ACT Government website includes a direct quote stating: "...we know parking will be a significant consideration for the community and this is being taken into account in the design phase of the project."

Yet, the formal background documents supplied for public comment explicitly state that "detailed design considerations including car parking provisions will be addressed at the development application stage."

This contradiction is a major objection to the process. If parking is already being "taken into account in the design phase," then that design information must be disclosed. Conversely, if detailed design is truly deferred, the public cannot be expected to provide meaningful feedback on the current proposal.

⁵ <https://yoursayconversations.act.gov.au/east-lake-place-plan#:~:text=The%20plan%20includes%20key%20highlights%20such%20as%3BThe%20Causeway%2C%20around%20heritage%20buildings%20and%20precincts>

The public consultation process on Draft Plan Amendment 06 (DPA-06) is fundamentally flawed because the amendment relates only to a zoning change, yet the accompanying background documentation provides specific, detailed development proposals. This includes:

- A Traffic Impact Assessment with modelling.
- An indicative site plan.
- Details on the number of practitioners proposed for the ISHC.
- A proposal for a deviation from existing planning guidelines.

By embedding these specific operational details within a consultation for a simple zoning change, the ACT Government has misled the community. The explicit statement that detailed design will be addressed later renders public comment on critical issues such as traffic, parking, and building impact ineffective and immaterial to the current process. This lack of clarity and procedural integrity diminishes the value of the entire consultation process.

This lack of clarity and procedural integrity is profoundly disappointing, particularly as the Inner South Health Centre is intended to be a community facility, funded by the community and designed explicitly to serve the community. The current consultation process gives the unfortunate impression that the ACT Government is proceeding with a predetermined outcome while ignoring the input and legitimate concerns of the very community the facility is being designed to serve.

Territory Plan and Coordination Section, CED
terrplan@act.gov.au

19 November 2025

Submission to Draft Plan Amendment O6 and Proposed Territory Priority Project Declaration - Inner South Health Centre

We welcome the opportunity to participate in this consultation process.

We **support** the draft Major Plan Amendment and the proposed Territory Priority Project (**TPP**) Declaration for the Inner South Health Centre.

We are excited to see a proposal for a substantial new community based health service in the Inner South. A significant number of our members, including the authors of this submission, live in Griffith, Kingston, Barton or other Inner South suburbs, and have a direct personal interest in better health facilities in the Inner South.

We see numerous benefits to this new facility:

- The site is ideally located to provide health services in a district that has experienced significant population growth while being underserved by such facilities
- The new facility will reduce the need for expensive hospital care and take workload away from overstretched hospital facilities, through appropriate preventative and primary care provided in a community setting
- The site is close to the R6 bus route, a rapid service that provides easy access to the centre and links it to the Canberra Hospital, and the 56 local route which connects it with the Winnunga Nimmityjah Aboriginal Health and Community Services.

The proposed centre was the subject of significant community consultation which concluded in 2024.

Major Plan Amendment

We support the proposed Major Plan Amendment.

The amendment will, regrettably, result in the loss of a small portion of the existing PRZ1-zoned parkland. However, the modest loss of open space is proportionate to the significant community benefits of the proposed facility. The impact will be minimised by the care taken to preserve the high value trees in the area and will result in an increase in local tree planting.

We note the findings of the Traffic Impact Assessment Report that parking demands can be comfortably accommodated at peak times. The proposal will result in a net addition of 63 parking spaces. Requiring any more parking on this site would come at the cost of facility floor space, or further intrusion into the park. Staff and patients (who are physically capable) should be encouraged to make use of the excellent public transport provision where possible to reduce parking demand. (We note our long-held concerns that unreliable parking study data has led to significant overprovision of parking for some land uses in other jurisdictions.)

We agree with the observations in sections 3.1.1 to 3.1.5 of the supporting report that DPA-06 aligns with all the themes of the *ACT Planning Strategy* to achieve a compact, efficient, liveable and accessible Canberra. We also consider the new facility will provide additional patrons for the nearby Griffith Shops.

In response to section 3.2 of the supporting report, we generally agree with the report's observations regarding alignment with the *Principles of Good Planning*, but we further believe that the housing affordability principles are applicable to this proposal. The housing affordability principles support planning that “*ensure[s] affordable housing is close to essential services*”. The amendment will provide essential health services to the community, including for public housing tenants nearby in Griffith and Narrabundah. High-density housing of all types is also playing an increasingly important role in addressing our housing affordability crisis, and the Inner South is becoming a high-density area - providing vital community facilities such as the proposed centre in the Inner South is important for improving the diversity of housing choices for Canberrans who require these health services.

Territory Priority Project Declaration

For the same reasons that we support the Major Plan Amendment, we also agree a TPP declaration is appropriate for the Inner South Health Centre. The proposal is a significant facility for the ACT that clearly satisfies the statutory criteria by achieving the objectives of the *ACT Planning Strategy*, and other government policies such as the *ACT Health Services Plan*. Delivery of this facility should be a priority unencumbered by the financial and delivery risks posed by ACAT review.

About Greater Canberra

Greater Canberra is a community organisation that advocates for a more liveable, sustainable and affordable Canberra. We believe that forward-thinking urban planning and the encouragement of connected medium density communities is vital to ensure that future Canberrans can enjoy social and economic equality and a high quality of life.

Our members come from all over Canberra, and from a variety of backgrounds - both renters and homeowners, from different stages of life, different levels of wealth, and different occupational and professional backgrounds.

Questions on this submission can be sent to greatercanberra@gmail.com.

[REDACTED]

From: [REDACTED]
Sent: Wednesday, 19 November 2025 12:52 AM
To: Terrplan
Subject: Comment on Inner South Health Centre TPP Declaration and DPA
Categories: [REDACTED]

Caution: This email originated from outside of the ACT Government. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear sir/madam

As a Griffith resident, I write in support of the declaration of the Inner South Health Centre as a Territory Priority Project, and in support of the associated Draft Plan Amendment.

The Inner South needs this facility. When I suffered a significant injury last year, for several weeks I had to make regular use of community nursing services and the walk-in clinics. This meant travelling to Civic, Weston Creek, and even as far as Gungahlin, which I did mostly using public transport. While the Civic community health facility isn't too far from Griffith, the other centres are much too far. A new health centre will be significantly easier to access and provide additional capacity for the health system while increasing the diversity of options. As we look towards the future, with the population density of the Inner South continuing to increase in line with the ACT Planning Strategy, this will only become more necessary.

I believe this project clearly satisfies the requirements for the declaration of a Territory Priority Project.

With regards to the Draft Major Plan Amendment, the loss of a small area of green space is unfortunate, but there aren't many great options for the Territory to deliver a facility of appropriate scale without developing on some green space. I am sure there will be feedback that this development doesn't provide enough car parking - but more car parking means more impact on the green space. I think it's an acceptable compromise.

Yours sincerely

[REDACTED]

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[REDACTED]



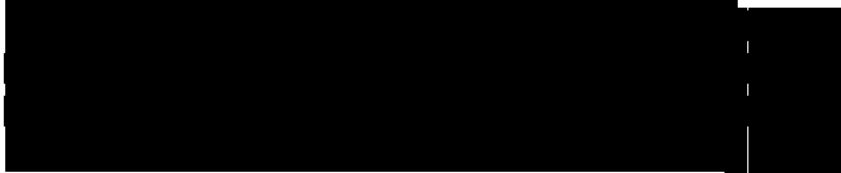
Territory Planning Authority

GPO Box 158

Canberra ACT 2601

terrplan@act.gov.au

cc



info@gnca.org.au

Dear Planners,

REZONING OF PARKLAND (DPA-06) AND THE INNER SOUTH CANBERRA HEALTH CENTRE

1. The Griffith Narrabundah Community Association (GNCA) is grateful for the opportunity to comment on this issue. This submission replaces that from the GNCA on this issue previously lodged on 19 November 2025.
2. The Government announced its intention to build a walk in Health Centre in Inner South Canberra, similar to those in other parts of Canberra, before the 2020 election. The Centre is to be located in Throsby Park behind the Griffith shops. To implement the project some areas zoned PRZ1 (Urban Open Space), currently regarded as part of Throsby Park, as well as an area zoned PRZ2 (Restricted Access Recreation Zone) must be rezoned to CF Community Facility land. The Government has commenced consultation on the required Major Plan Amendment for this rezoning (DPA-06). As the Minister has foreshadowed that the Government is considering declaring this project a Territory Priority Project, thereby curtailing any further real opportunity to comment, we hope we will be forgiven for including issues related to the Health Centre which do not solely focus on the rezoning issue.
3. The GNCA welcomes the idea of a new Health Centre for Inner South Canberra, and believes that if it were implemented appropriately this could bring many benefits to the residents of the inner south. Many believed, following the Government's early announcement, that the Centre would be Walk in, with the long hours and open on weekends features familiar with other Health Centres in other parts of Canberra. These people are therefore surprised and disappointed to find that what is proposed is an appointment only, office hours on weekdays facility, with what appears to be a major emphasis on dental services which will not be available to any but the small number of people that qualify for government funded dental services. Many of the other services offered are only available under Medicare if prescribed by a GP.



4. This unexpected change in focus has led at least some to wonder whether the Centre, with its consequent loss of parkland, mature trees, and threats to parking at Griffith shops, is really worth the benefits that it might bring. Others wonder whether the Centre's objectives might be better achieved at another site, or whether these objectives could be better achieved at a lesser cost than the rumoured \$22m for the Centre.
5. The DPA-06 document itself does not argue the case for the rezoning of parkland. It merely notes (p.1) that "*The zoning change will enable the development of the Inner South Health Centre on this site*", and at p.3 that "*The rezoning will enable the development of the Inner South Health Centre at the proposed location within the Community Facility zone*" and at p.6 that "*The proposed rezoning of the site to Community Facility Zone would facilitate the delivery of health care services to the local community*".
The GNCA does not regard the repeated presentation of the same comment as a persuasive argument. No balanced assessment of the pros and cons of the proposed rezoning is offered, it seems to be assumed that the construction of *this* Health Centre with its specific mix of services, located at *this* site, is so obviously a good thing to all parties that no further consideration is warranted. The closest we get is where the DPA-06 document indicates under "**2.3 Justification against the Act**" at p.6, that "the positive and negative impacts of the proposed amendment" will be outlined in the supporting report.
6. The two documents released in support of DPA-06, the Supporting Report, and the "Traffic Impact Assessment Report" (Traffic Report), are poor quality documents and quite unpersuasive. The Supporting Report does not convince that Throsby Park is a good or appropriate site for the Centre, nor satisfactorily evaluates the pros and cons of building a centre which requires rezoning of parkland. The Traffic Report does not provide a convincing or plausible estimate of parking demand following opening of the new Centre. A fuller analysis of the shortcomings of the Supporting Report and the Traffic Report can be found at Attachment B and Attachment C at the end of this submission. But at this stage it must be recognised that they contain errors of fact, are tendentious, and are of such low quality that one wonders if they were produced by AI. An assurance that this was not the case would reflect badly on both consultants.
7. We note that the Plans are 1:500 scale despite the fact that scales on the Plans indicate that it is 1:200. The true scale can be determined by using the length of the Griffith shops, which from the northwest side of Gryphons to the southeast side of ShopRite is 103.5m. We are surprised that this issue has not been picked up by either the architect or the project manager within the Government. What else has escaped notice?
8. The GNCA supports the comments made in the ISCCC Submission on this matter, and hopes that this submission will complement and supplement the points made in that document.

RECOMMENDATIONS

9. The GNCA **recommends** that the Government:
 1. **Prepare and release a paper or analysis which realistically assesses the size and incidence of benefits and costs of rezoning of existing parkland, particularly land zoned PRZ1 to permit the construction of the Health Centre, and any proposals to ameliorate or mitigate such loss of parkland;**
 2. **Commission a new organisation to develop a credible estimate of likely parking demand following the opening of the Centre, basing its conclusions on local data, or alternatively ask the authors of the Traffic Report to redo their assessment using more relevant data, and leaving it to the Government to decide how much of this demand for parking spaces it would desirable to make sure is available;**
 3. **Revert to the original position of 2020 that the Centre would be Walk In, and extend its hours so as to be open in the evening and on weekends as with Health Centres elsewhere in Canberra;**
 4. **Give serious consideration to alternative sites for the Health Centre, but also consider disaggregating the Centre, with the Dental Unit, for example, being located at one local or group centre, while other services are distributed over other shopfronts elsewhere in the inner south;**
 5. **Release and place on the Have Your Say website all the documentation the Government holds about the proposed Inner South Health Centre, including the Site Report justifying the selection of Throsby Park as the site for the Health Centre, the Tree Survey Report and associated Indicative Demolition and Tree Removal/Protection Plan, and any schedule of trees and their condition etc, the Geotechnical Survey prepared by Fortify, and any other documents relevant to the proposal;**
 6. **Release any Business Case or analysis demonstrating that it is convenient and desirable for the diverse and unrelated health services to be provided by the Centre to all be co-located in the same building;**
10. While the GNCA is grateful that the Minister for Health has been willing to meet with us, we have found that the flow of information from the Government has not matched the Minister's willingness to communicate. There are a number of examples where information held by the bureaucracy has not been made available, for no discernible reason. An example is the Site Options Analysis which was mentioned during our meeting with the Minister on 5 September, but was not released with other relevant documents at the commencement of the consultation period for DPA-06.
11. We understand that this document has now been released to a constituent attached to the Minister's reply to a representation, but it has not yet to our knowledge been publicly released. We call for this document, and those identified in the Recommendation above, to be placed on the Have Your Say Website beside the current DPA-06 supporting documents,

and the period of consultation extended for a suitable period to allow interested citizens to read and digest these and if necessary, amend any comments they might wish to make.

SUMMARY OF THE ISSUES

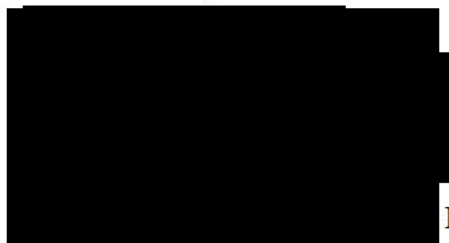
12. The GNCA is aware that this submission is considerably longer than would be desirable, but feels that this is an unfortunate consequence of the low quality of the proposal put forward and the inadequacy of the supporting documentation released by the Government. Readers who are short of time may take the arguments on trust and skip Attachments A, B, and C.
13. DPA-06 proposes to amend the Territory Plan by rezoning various portions of existing public parkland to CFZ. No serious justification for this loss of parkland is offered except that it would facilitate the construction of the Health Centre. Some errors in the Supporting Report are identified. The GNCA is not convinced that the benefits offered by the proposed Health Centre outweigh the loss of parkland. There needs to be a more powerful argument than that the Government would find this rezoning convenient.
14. The impact on the Griffith shops is a critical measure of the benefits and disbenefits of the proposal. A failure to provide enough parking for both patrons of the shops and patients at the centre will lead to a loss of patronage and diversion of business to nearby Manuka and Kingston. Unfortunately, the Traffic Report, which is supposed to demonstrate the adequacy of the proposed parking, is entirely unconvincing. The best that one can say is that the parking may be adequate. On the other hand, it is entirely possible that the parking may not be. In addition, there will be a considerable period when work of moving the children's playground, constructing the stormwater retardation basin in Throsby Park, and then building the Health Centre, will disrupt parking at Griffith Shops. Again, one can hope that this will be well planned to minimise any disruption, but the quality of documentation so far does not encourage optimism. The GNCA is not yet convinced that parking will be adequate.
15. The proposed centre will be large, with a footprint of about 1,500m² and over two thirds the length of the Griffith shops. It will not be, like that at Weston Creek, a walk-in centre open for extended hours 7 days a week,. The services will focus on the provision of dental services, accompanied by various seemingly unrelated health services and some nursing. The public is likely to be disappointed that what is proposed is not what they expected. It is not clear what advantages accrue from co-locating these other health services with a large dental clinic. It may be worthwhile locating these services separately in individual shop fronts. Possibly the Government could offer these services by way of vouchers to existing private practitioners. The GNCA believes that the services proposed to be offered do not reflect the public's clear preferences and the Health Centre should be redesigned as a nurse led walk in health centre with extended opening hours such as at Weston Creek.
16. Why the 'Inner South' Health Centre should be located in Throsby Park behind the Griffith shops is not clear. The Government has a Site Options analysis but has not released

this on DPA-06 website. A seemingly more suitable site in Manuka appears to not have been seriously considered. Other sites with at least the same level of public transport access, such as on Cunningham St in Eastlake (in the former rail yards) do not appear to have been evaluated. Other health centres are located at Group or Town Centre to take advantage of better transport links and parking, and a greater probability that access and mobility issues will be properly addressed. Despite the optimistic assessments in the Supporting Report, behind the Griffith shops is not an outstanding location when considered against these criteria, and why the Government appears to be set on this site is not clear. The Supporting Report vaguely suggests that dental issues are more common in 'the south of Canberra' but does not make the data behind this public, nor explain why the Throsby Park site is the best in 'the south of Canberra'. The GNCA remains unconvinced that Throsby Park is the best site for the Health Centre.

17. The Supporting Report indicates that some trees will have to be removed for the construction of the Centre but says that these will be replaced by a greater number of superior trees. In the absence of any Arborists' report and Tree evaluation the GNCA cannot be certain that these claims are valid.
18. When jointly announcing DPA-06 with Health Minister Stephen Smith Minister Steel asked for views on whether the Health Centre project should be made a Territory Priority Project (TPP). This status would mean that Third Parties could not lodge planning appeals against the proposal. The GNCA has long felt that this approach is misdirected, and that the best way to speedily secure approval, and construction of Government projects is to make sure that the planners, architects, engineers and others associated with the project are the best available. More money should be spent on getting the project right in the first place rather than in employing lawyers to defend substandard, non-compliant bad designs. The GNCA still holds this view and is opposed to the extension of TPP status to the Inner south Health Centre project.

The issues are discussed in greater detail in Attachment A. The GNCA thanks you for the opportunity to comment.

Yours faithfully



President, GNCA

10 December 2025

DISCUSSION OF THE ISSUES

Loss of parkland

19. A problem with the Throsby Park site which the Supporting Report fails to address in any detail is that it involves the rezoning to CFZ of some 2,158m² of PRZ1 land which nominally forms part of Throsby Park (at this stage we should note that the Supporting Report appears to believe that it is some 4,647m² of PRZ1 zoned land that is to be rezoned, but how this number was derived is not apparent). This is only slightly less than one third of the entire site.
20. The two areas in question, part of Block 33 and the whole of Block 39, were gazetted as PRZ1 in 2008 as part of the implementation of the Open Space Network Project. Details are in Variation to the Territory Plan No.165 Open Space Network of May 2006. As this document says, zoning as Urban Open Space “indicates that the area has been set aside for long-term open space use and is generally characterised by unrestricted public access. As such, these spaces have a high level of statutory protection.”
21. One could argue that some 1,385m² of the area to be rezoned is Block 39, which though zoned PRZ1 has never permitted public access, and remains fenced off to this day. But this would be to reward the somewhat doubtful, if not improper, actions of City Services in not removing this fence in 2008, which scarcely sets a good precedent for the future. The remaining 773m² forms the corner of the old tennis courts on Block 33, and has indubitably been part of Throsby Park since 2008.
22. At nowhere in the Supporting Report is there an explanation of why it is desirable to expropriate either this portion of Block 33 or the entirety of Block 39 apart from repeated statements to the effect that this would allow the building of the Centre. What other parks in Canberra might we find suddenly expropriated for worthy Government ends if expediency were the only test?
23. In assessing the positive and negative impacts of rezoning PRZ1 parkland the Supporting Report states at p.34 that “*The change to the PRZ1 portion of the site is not seen to adversely impact the surrounding open spaces ability to achieve the above policy outcomes*” This is in relation to the rezoning of an area (on the Report’s figures) of 4,647m² of PRZ1 zoned land in Throsby Park, which at present has an area¹ of 6,680m², or about 70% of Throsby Park. While we believe that the report is confused about the areas involved (see Attachment B) this

¹ Derived by summing the areas of Blocks 34 and 40 (freely available on Actmapi, and the PRZ1 portion of Block 33, available from the gazettal notice. Why the authors of the Supporting Report appear incapable of doing the same should perhaps be raised with them by the Government.

conclusion appears unreasonable. Surely the reasonable person would concede that reducing a park to 30% of its former area might possibly ipso facto be seen as an adverse impact?

24. At p.39 The Supporting Report says “*The loss of PRZ1 and PRZ2 land as part of the proposal is noted as a perceived impact, however it is noted that the land itself is not broadly used for the uses perceived for these zonings, rather the site is currently dedicated to parking and low-level landscaping.*” This is a disturbingly subjective assessment, but if the reference to “uses perceived for these zonings” is a comment on the public’s inability to use Block39 as parkland despite its zoning is surely not an argument for its rezoning to CFZ.
25. At p.41 the Report states “The proposal seeks to rezone blocks 33 and 39 Section 78 Griffith to CFZ – Community Facilities Zone”. This appears to enthusiastically expand the actual rezoning proposed in DPA-06, which restricts this to the PRZ1 portion of Block 33, and leads one to wonder how clearly the authors of the Report understand the proposed amendment. We also note in passing that the total area of Blocks 33 and 39 is 4,560m², not the 4,647m² the Report uses.
26. Further down the same page the Report states “*The proposed rezoning will benefit the local community through the provision of a new Inner South Health Centre which will provide a broad range of health services to the Inner South*“ and “*The potential adverse impacts of the change have been appropriately mitigated through the 30% PSP and functional design brief. As a result, the proposal represents a significant net benefit to the community in achievement of a key Government initiative*”. The first statement is not balanced by any assessment of possible disbenefits, and the latter statement has a decidedly authoritarian tone with its reliance on impenetrable (and possibly meaningless) jargon (the term ‘30% PSP’ is not defined in the Report), and the suggestion that the Community has received a benefit because the Government has achieved one of its key objectives. More AI at work?
27. We would be reassured if the Government could produce a balanced and reasonable paper explaining these actions and putting forward measures which might ameliorate or remediate the loss of this public access land. One possibility might be to preserve the existing open space on the CFZ portion of Block 34 and move the parking proposed to be located there to the upper portion of Throsby Lane beyond the round-about, which currently provides access to Block 39. This would involve expanding the site to take in some space used for roads, but this should not present a difficulty.

Parking and its Impact on Griffith shops

28. The Centre is to be built on land currently used for parking for the Griffith shops. It is expected to open in 2028 after construction in 2027, following the construction of the Storm Water Retardation Basin in Throsby Park in the second half of 2026. Construction of both the Retardation Basin and the Health Centre will involve disruption, loss of parking, and diversion of trade from shops.

29. On the other hand, it is possible that the influx of construction workers and tradies will to some extent offset the loss of trade due to reduction in the amount of available parking.
30. The plans show that that any existing parking spaces lost by the construction of the Health Centre will be replaced, with additional spaces being provided. But will the additional parking spaces be enough? The risk here is that if there is inadequate provision of parking for the Health Centre then the shops will lose trade as potential shoppers go elsewhere (Manuka and Kingston are both very close). The best case outcome is that the Health Centre draws new business to shops, without displacing any existing custom. This is possible if parking is adequate.
31. The Traffic Report claims adequate parking will be available at the opening of the Health Centre, but the quality of this analysis leaves much to be desired. The GNCA is very concerned that construction of the Health Centre does not negatively impact on the shops. We accept that the Government will try and minimise any disruption, but must concede that Civic's experience with Stage 2A of the tram, and the redevelopment of the Red Hill flats site, does not give reason for optimism.

Form and Function of the Centre

32. It is regrettable that we know considerably more about the Centre, its design, and the services it is expected to offer from information in the supporting documents provided to justify DPA-06 than we do from any information provided directly by the Government. A week after the GNCA's meeting with the Minister on 5 September we received a plan of the site with the interior blanked out, and no indication whether the Centre was to be one or two-storied. Fortunately, plans of the Ground and First Floors of the Centre were included at Appendix E of the Traffic Report, a document released in support of DPA-06. The plans were drafted in December 2024 and revised in January 2025 so why they were withheld until October 2025 is not clear. This lack of trust in the public can only engender suspicion that the Centre is perhaps not everything that the public might otherwise expect.
33. The Centre will be a large building with a footprint of about 1,500m², and about 70m long (about the distance from the Gryphon to Recess Coffee), at a diagonal to the line of the shops and local street grid. Above the ground floor there will be a small first floor with additional staff car parking and staff amenities, (showers, staff room, etc). There will be about 50 staff and 28 "points of care". There will be 78 rooms, with 71 of these on the Ground Floor. Currently there are 59 car parking spaces on the site of the Centre; these will be replaced with 87 public spaces and 32 spaces reserved for staff. So total parking will be increased by 60 spaces, but parking available to the public increased by only 28 spaces. Some of this additional parking is to be located in a portion of Block 34 not currently used for parking with a number of trees on it. If possible, it would be desirable to retain this existing open space and relocate the parking to alternative areas.

34. While there may be persuasive reasons why a building co-locating a number of unrelated services is preferable this has not been demonstrated. Similarly it may be that Throsby Park behind the Griffith shops is the most accessible and most central site for the inner south, but if so the case has not been well argued.
35. Services to be offered from the Centre are listed on p.3 of the Supporting Report. These services include:
- ACT Pathology collection services
 - Post-acute Care and Chronic Disease Management
 - Nursing
 - Podiatry
 - Nutrition
 - Physiotherapy
 - Rapid access clinics
 - Dental services
 - Dental chairs
 - Special needs dental chair
 - Bariatric dental chair
 - Dental laboratory
 - BreastScreen ACT
 - Various multidisciplinary group exercise and education programs, which may include cardiac, heart failure, and pulmonary rehabilitation services.
36. This makes it clear that the Centre will not be a walk-in nurse led Centre, such as is at Weston Creek, open 78 days a week from 7.30 am to 10 pm. Visits will be by appointment only, during weekday office hours. The availability of medical services, as distinct from health services, will be limited. Many members of the public expecting something similar to the Weston Creek Centre will be disappointed by what is offered,
37. We note the emphasis on dental services. These will not be available to all ACT residents, but only those with appropriate Government cards. As it seems probable that these will be in lower income brackets it is worth putting some effort into ensuring that they have the easiest access to any dental facilities. It seems unlikely that the Griffith shops, with their limited public transport, would meet such an ease of access test. Narrabundah (on the last figures we have seen) has twice the level of public housing than does Griffith. If we take public housing as a reasonable proxy for access to Government funded dental services, then if the provision of dental services is the principal determinant, then it appears that the Health Centre, or that portion providing dental services, should be located at Narrabundah shops.
38. The remaining services to be offered at the Centre cover a wide range. We note that many of these are offered by independent private practitioners. From the lay-person's point of view there seems to be no requirement that health services such as Pathology collection, Podiatry, Nutrition, Physiotherapy, group exercise and education programs to be located in specialist

accommodation. This seems to suggest that there are little gains to be had by co-locating all these in one building, particularly if the building is principally dedicated to the provision of dental services.

39. With the cost of the proposed Centre apparently put at \$22m, we trust that the Government has fully explored all possibilities to reduce the costs of service provision, including disaggregation of services and the use of existing commercial facilities where available. While it is possible that there are advantages in co-locating such different services, we are not aware of any evidence of this, and the onus rests with the Government to demonstrate that this is the case. Arguments on the lines of “We have always done it this way” should not carry much weight.
40. In the GNCA’s meeting with the Minister we were advised that the services to be offered were not yet finalised. For example, it was not yet determined whether X-ray and CT facilities would be included. We are not certain what is meant by “BreastScreen ACT” but presume that an X-ray facility will be available for screening unless this item merely covers the provision of office space.

Proposed location

41. The proposed location of the Centre in Throsby Park is not obviously the best location for a Health Centre intended to serve the entire inner south. Geographically the centre of these suburbs lies somewhere near Manuka, while we suspect that the population centre might lie closer to the Kingston group Centre or near Kingston Foreshore. Not only are Griffith shops/Throsby Park not central to the inner south, they are also not central to Canberra south of the lake, in relation to which the inner south sticks out like a peninsula to the east. Neither, despite the waffle in the Supporting Report, are Griffith shops/Throsby Park particularly well served with public transport, as only one bus service runs along Stuart St. We note that most, if not all, other Health Centres in Canberra are located in Group or Town Centres, presumably reflecting the centrality of such centres to the areas they serve, greater availability of patient car parking, and greater choice in public transport access.
42. This raises the possibility that there may well be more desirable sites for the Inner South Health Centre, better served by public transport, and closer to the centre of population. Assuming that the Government decides that co-location of all the proposed services is desirable, the obvious places to examine are at Manuka, and other possible sites at Kingston Foreshore (possibly in the as yet undeveloped Arts Precinct) and Eastlake (east of Cunningham St in the former rail yards).

43. If the Health Centre is to be located in Throsby Park a considerable amount of work will need to be done to make the Centre accessible from both bus stops on Stuart St, both to and from Manuka. This is particularly so if it is intended that the Centre be accessible to those with restricted mobility. A proper level crossing will need to be established to let passengers cross from the bus stop on the west side to the east side of Stuart St.
44. While it is not possible to be precise in the absence of a survey map, it looks like Stuart St is about 3m or perhaps a little more above the Barker St pavement outside the Griffith shops, and from there it is a further 2.5m or more down to the floor level of the Centre at 578.700. Proper accessible pathways from Stuart St down to the shops, and then from the shops down to the Centre, dropping only at the permitted gradient compliant with the Access and Mobility Code, would have to be installed and maintained. In light of this it might be easier and cheaper to raise the main floor of the centre to the same level as the Barker St pavement, with an elevated walkway from the shops to the Centre. This would have another advantage in that the space underneath the Centre could be used as car parking, reducing the loss of parkland.

Trees

45. There are a number of trees on the site. It seems that some loss of trees is inevitable, and this is acknowledged in the Supporting Report. For example, the Report states at p.22 “The PRZ1 portion of land contains several high and exceptional value trees which have been identified to be retained as part of the proposal” and at p.23 “The demolition plan shows several trees to be removed, which are intended to be replaced with additional plantings”, “The proposal is designed to minimise the loss of green space, and to augment any loss of trees with significant trees planted exceeding those impacted by the proposal”. and “Figure 2 of this document (*Griffith Health Centre Indicative Site Plan*, prepared by May & Russell) demonstrates a high-level of plantings around the proposed facility which will exceed the number of trees to be removed.”
46. It appears from this that an Arborist’s report and tree survey has been prepared. The Supporting Report says at p.7 “A separate tree survey report is being prepared by SPACELAB”, and the low-resolution Indicative Demolition and Tree Removal/Protection Plan at p.23 of the Report indicates that this had been prepared at the time of release of the Report. However, the Government has chosen not to release this/these document(s).
47. In the absence of the Arborist’ Report we can only make a guesstimate about the trees to be removed on Blocks 33 and 34 on the basis of the Arborists Report for the Storm Water Retardation Basin in Throsby Park, but this gives no knowledge of the trees on Block 39. Our best estimate is the removal of between 20 and 30 trees.

48. It will remain difficult for the public to assess to what extent the Government's intention to replace removed trees can be achieved until the release of the Tree Survey Report and a good quality version of the Tree Removal/Protection Plan. The public cannot accept assurances that the number of removed trees will be exceeded by replacement trees in the absence of the relevant documents, especially in light of the Supporting Report's tendency to indulge in what can best be described as flights of imagination. The GNCA will remain sceptical about the adequacy of any replanting until the relevant document(s) have been released.

Territory Priority Projects issue.

49. In the Joint Media release of 7 October 2025 announcing DPA-06 the Minister for Planning Chris Steel indicated that the Government was considering declaring the Health Centre a Territory Priority Project. This would prevent any third party appeals in relation to defects in the planning. This would be possible if a proposed amendment to the Planning Act 2023, which proposes extending appeal exempt Territory Priority Progress status to projects undertaken by the Health and ACT housing Directorates.

50. The GNCA lodged a submission to the Legislative Assembly inquiry into this proposal explaining why the idea had no merit. The GNCA remains of this view. If the Government believes that a project may be held up by third party appeals the solution is to appoint better qualified staff who can supervise designing a project that is compliant with current planning rules.

51. Any supporter of proposals to extend the scope of Territory Priority Project exemptions should also be aware that this does not preclude challenges, it merely moves them from the ACAT to the ACT Courts, which would make the process much more cumbersome and slow. This would have the effect of excluding any but the richest individual from challenging a planning decision, while leaving developers with full scope to litigate against a rival's projects, which we understand is the source of at least some ACAT appeals.

52. The suggestion that citizens should be deprived of their originally common law based right to object when the Government has made a mistake is appalling and should be opposed by all those who believe in democracy. The GNCA remains firmly opposed to the use of the TPP power on any project other than the light rail, and in particular is opposed to any suggestion that DPA-06 and any work associated with the proposed Inner South Health Centre be declared a Territory Priority Project.

Supporting Report

53. The establishment of an Inner South Health Centre is a serious proposal, and the tax paying public has a right to expect that the pros and cons will be examined in a professional, honest, and unbiased fashion. Unfortunately, this does not appear to be the case.
54. The Supporting Report was prepared by SpaceLab Urban Planning and Design and is dated 30 June 2025. The Report “is intended as supporting documentation providing key reasons and considerations for the rezoning” and “addresses potential positive and negative impacts of the proposal including provision of community infrastructure, equitable and accessible provision of healthcare, local amenity, open space, traffic and parking” (p.1).
55. It appears that the Consultants are not familiar with the site, and at times seem to have come no closer than a Google Maps or ACTmapi aerial view. For example, at p.22 The Report says “The PRZ2 portion of the rezoning is taken up primarily by a surface car park, toilet block and several small, low- quality trees over a manicured grass setting.” Those more familiar with the area will know that the “toilet block” is an about 4m by 3m corrugated iron structure with a large roller door as the only entrance, and holds large rubbish or recycling containers. From the ground it would be impossible for any sane human to confuse it with a toilet block. While this is possibly a minor error it makes one wonder what else about the site have the Consultants misinterpreted or misunderstood?
56. The Report appears confused about the various portions of the blocks to be rezoned, which is unfortunate as this issue is supposed to be what the Report is Supporting. At p.22, and again at p.33 the Report says “*The proposal will result in the rezoning of 2,364m² of PRZ2 – Restricted Access Recreation and 4,647m² of PRZ1 – Urban Open Space*”.
57. These figures are hard to reconcile with data available from ACTmapi and elsewhere, as set out in ‘Table 1: Health Centre site blocks zonings and areas’ below. They are also puzzling because at p.6 the Supporting Report appears to get the numbers correct.

Table 1: Health Centre site blocks zonings and areas

Block	Name	Zoning			Total
		CFZ (m2)	PRZ2 (m2)	PRZ1 (m2)	Area (m2)
Block 33	Griffith Tennis Courts		2,402	773	3,175
Block 34	Throsby Preschool	2,329		2,286	4,615
Block 39	Works Depot			1,385	1,385
	Health Centre Site	2,329	2,402	2,158	6,889
	Total area of three blocks				9,175

59. The PRZ1 area of Block 33 is specified as 773m² at p.19 of “Variation to the Territory Plan No.165 Open Space Network” of May 2006, and Gazetted on 31 March 2008. This means the remainder of Block 33, the portion zoned PRZ2, must be 2,402m². This is larger than the 2,364m² mentioned in the Supporting Report and quoted in paragraph 56 above. From Table 1 one can see that the area of the proposed Health Centre site that needs to be rezoned from PRZ1 to CZF is 773m² (of Block 33) + 1,385m² (Block 39) = 2,158m², less than half the 4,647m² stated in the Supporting Report.
60. Much of the commentary in the Supporting Report seems to be relentlessly positive, determined to find a pearl amongst the muck.
61. For example, at p.25 it says that “The redevelopment of a largely unused area to provide a much needed community facility while improving the level of tree planting to the immediate area is seen as a net positive for the locality.” Of course, that depends on who is doing the seeing. A considerable portion of the site is currently used as parking for the local shops, and can scarcely be described as “largely unused”. The remainder is the currently fenced off Block 39, or part of Throsby Park, an area that has been neglected by the Government, so the children’s playground equipment and related facilities are not at the standard of some more fortunate areas, but the park is used by locals as much as any typical park in Canberra. The failure of the Government to remove the fences around Block 39 are not an argument for its rezoning to CFZ. If we accept this interpretation of ‘unused’ most of the parks in Canberra could be turned into the sites of Government buildings, and then be assessed as having improved local amenity. The proposed health centre is not “a much needed community facility”. There has been no local demand for a centre with the restricted services now proposed. Many might feel that the Centre is being wished upon us by the Territory Government which has decided to locate this facility here for reasons which have not been made clear.
62. Again, at p.30 the Supporting Report proclaims “The high-level of public transport and active travel routes to the site, enhance its accessibility without increasing car dependency”. Back in the real world we note that there is only one bus service which travels along Stuart St. Labelling this a “high-level of public transport” seems to be setting the bar a little too low. The only areas that would not fall into such a high level of public transport would be those with no bus service, like Oaks Estate. To most of us there is a difference between high access and some access.
63. This farrago of gushing enthusiasm for siting of the Health Centre at Griffith shops, and the occasional random failure in relation to facts, which seems to have slipped by the authors unnoticed, might lead some to ponder if this report is the product of AI, something which is now not unheard of. Whatever the basis of this, it leaves a lingering concern that anything, no matter how adverse, would be present as another powerful argument that the Centre should be in Throsby Park. This robs the Report of its persuasive power. It is certainly not an objective evaluation of the pros and cons of the possible locations for the Health Centre.

Traffic Report

64. The Traffic Impact Assessment Report, finalised in January 2025, has other problems. Much of it is related to the rather obvious conclusion that the Centre should not generate so much new traffic that use of the local streets are likely to be significantly affected. Only pages 23 to 26 are devoted to determining whether there will be adequate parking for the shops at Griffith when the Health Centre commences operations. Unfortunately, the Traffic Report is hard to follow, and doesn't always explain its methodology or the meaning of terms it uses. Rather than looking at current parking patterns, and then trying to predict how much extra parking demand the Health Centre might generate, it relies on 2015 data collected in NSW at 20 "Health Centres" in NSW. No effort is made to convince the reader that these Health Centres are in any way comparable to the proposed Inner South Health Centre. Neither do the authors attempt to adjust for changes in motor vehicle ownership and propensity to use public transport between NSW (dominated by Sydney) and the ACT, both in 2015, and at present, in 2025. Maybe the authors just don't care.
65. Having imported the basis of the projected parking demand the authors then go to some length to explain why the Government doesn't actually have to plan to handle this number, because those who can't find parking spaces can just park in the neighbouring streets. We believe that it would be more desirable for the Government to try to make sure that all those seeking to park at Griffith shops after the Centre is operating are catered for, so that the Griffith shops do not suffer from the arrival of the Health Centre.
66. The GNCA's view is that the parking demand calculated in the Traffic Report is unconvincing, and believe the Government would be wise to seek an alternative assessment from a different source, ideally using data from the ACT.
67. The Traffic Report shares a difficulty with the Supporting Report in that it seems confused over the area of the Health Centre site. At p.8, and again at p.31 the traffic Report says "The subject site has an area of 7,027 sqm." It is hard to reconcile this number with the area of 6,889m² as derived in the table in Attachment B above. Are both reports drawing numbers from some flawed source document the Government hasn't yet released, or is this another example of AI in the workplace?

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Dear Planners

Proposed GRIFFITH HEALTH CENTRE for the Inner South

Thank you for the opportunity to comment. I have taken the opportunity to not only comment on Zoning.

As the content below demonstrates, the proposed health centre for the inner south must NOT be built behind the Griffith shops in the ACT Government's preferred location.

The current ACT Government invests a substantial amount of taxpayer revenue into maintaining and developing Canberra's health services. This is necessary given that over 25% of consumers using ACT health services are based in NSW and the ACT Treasury's ambitious projections of population growth across Canberra.

As a long-term resident of Canberra, the raising level of debt for all Canberrans is very concerning and investment in a health centre located in Griffith is both disappointing and flawed. There is little wonder the ACT's expenditure and credit rating (AA by S&P Global Ratings in September 2025) continues to spiral downwards. Further examples of poorly considered capital expenditure include the new Canberra Stadium, Light Rail, Convention Centre and Canberra Theatre. These projects do not fall into critical infrastructure expenditure like health. Any expenditure needs to be founded on evidence-based criteria, thorough due diligence, rigorous consultation and meet taxpayer expectations with the funds invested. The proposed inner south health centre in Griffith meets none of these.

Why select the suburb of Griffith for the inner south health centre?

Health centres across Canberra have traditionally been located at major town centres or central hubs for good reason, including:

- to facilitate effective public transport (single trip by bus) and destination on a regular timetable (there is no dedicated "rapid bus" connection to and from the Griffith shops, unlike a town centre)
- the provision of existing parking infrastructure
- existing disability access to, and throughout these major hubs
- access to ancillary health and medical services such as professionals located at a town centre, including large pharmacies.

The suburb of Griffith has a deteriorating infrastructure and does not meet any of the above criteria.

Feedback on the location of a health centre based in Griffith

As a resident of Griffith, I attended many of the consultation sessions and contributed to the Your Say survey. From what I have personally heard and read; there appears to be very little regard to, or consideration of, the following:

- Many respondents were somewhat positive about an inner south health centre located elsewhere.
- The majority of feedback about the health centre being located in Griffith was negative.
- Many suggested alternative locations such as Manuka, Kingston, Kingston Foreshore, the new Eastlake precinct using existing community facility blocks, or Narrabundah becoming a health hub, adjoining the existing Winnunga Nimmityjah Aboriginal Health Service.
- A great deal of Griffith/Narrabundah residents objected to the proposed location and the proposed rezoning of highly valued open space, children's playground and parklands to support a health centre.
- Residents, the community and the Griffith Narrabundah Community Association (GNCA) recalled lobbying the ACT Government in 2008 to rezone the area behind the Griffith shops to urban open space.
- Many commented on the loss of very limited green open space, parkland, trees, plants, shrubs and amenity that is highly valued by all inner south residents and business owners.
- The Your Say Report states *'Griffith and Narrabundah residents highly value and enjoy the very limited urban open space remaining and do not require a Health Centre at the proposed location at the cost of losing highly valued playground and parklands.'*
- Many residents consider it very undesirable to build a two-storey health centre at the rear of the Griffith shopping village and believe this will alter the fabric, character and atmosphere of the Griffith shops. Additionally, many find it disappointing that this has not been taken into consideration.
- Traffic and parking arrangements for the proposed health centre have not been taken seriously with the Traffic Impact Assessment Report dated 24 January 2025. The report used data that was over 10 years old!
- Failure to suitably and accurately address traffic and parking will indeed have a very negative impact on the Griffith shops and residents of Griffith and Narrabundah.
- Residents living near the proposed health centre may have their already narrow residential streets turned into overflow parking lots.
- Current bus transport to the Griffith shops is very restrictive and nowhere near optimal compared to services provided for Manuka and Kingston.
- Pedestrian access from the bus stop along Stuart Street to the proposed health centre is over 300 metres and extremely hazardous with many steps.

- A great deal of planning, design and expense would be required to facilitate the accessible pedestrian traffic from the Stuart Street bus stop, through the Lafoy-Halal Park, parking area, shopping centre and lane way to the proposed health centre.
- The impact of such earthwork, construction, building and trades parking on Throsby and Blaxland Parks require much planning, consideration and consultation.
- Patrons from across Canberra and nearby NSW support the Griffith shops due to the range of organic produce and therapeutic offerings by many of the businesses. Insufficient parking, both short and long term, will jeopardise the longevity of these specialised shops and providers.

Community Consultation?

At no stage has consultation on the location of the proposed health centre in Griffith been transparent or evidence-based.

My approaches to the Health Minister, the Health Minister's staff and the Health Minister's Directorate have generally been ignored. Having requested full disclosure on 27 July 2025 with regard to reports, studies and plans, it has taken until 17 November 2025 for the Minister's Office to respond and provide these documents. As such, this now allows only two business days to analyse and provide comment prior to the close of the consultation period on 19 November 2025.

- When seeking public and community comment, it is helpful if ALL relevant documentation is made available in a timely manner to engender informed decision-making, and not be withheld, as is the case with the documentation for the proposed health centre in Griffith.
- Further, why was there no:
 - site option analysis provided for the consultation period (report issued in March 2024 by May + Russell) – with options such as operating in a re-purposed, existing community facility location in Manuka or Kingston, where a health centre would be more accessible
 - arborist report – not made available despite reference to this document
 - relevant Traffic Impact Assessment, given the dated information and methodology
 - geotechnical survey prepared by Fortify
 - attempt to save/retain urban open space, parkland, trees through basement and/or rooftop parking, despite this issue being clearly identified in the pop-up consultations and Your Say Report – this is extremely disappointing and demonstrates the Government's disconnect with the community.

What happened to the “Walk-in Health Centre” model?

Throughout the entire consultation process, the inner south community was led to expect a “Walk-in Health Centre” with GPs and nursing staff. Was this to generate local support for the proposal and increase demand for a health centre service?

On nearly ALL occasions, the health centre was likened to the services provided at the existing Weston Creek Health Centre, including similar services and hours of operation.

In the case of a health centre in Griffith, this is NOT what is now on offer. This is not what was highlighted at the pop-up stands and the Your Say survey. The engagement and consultation is nothing short of a farce, to be located in a suburb with little viable access for those most needing a health centre.

This change of proposed use for the health centre calls into question both the required capital expenditure for such a project, and the social cost of the proposal, in terms of lost parkland, the likely destruction of mature trees, shrubs and plants, and the loss of amenity and village atmosphere that ALL residents value.

Territory Priority Project

The Minister for Planning and Sustainable Development, Chris Steel, recently stated that *Infrastructure Canberra* has proposed the Inner South Health Centre be declared as a *Territory Priority Project (TPP)*. As such, this would exempt the project from third party appeals.

This strategy, to bypass the normal development approval process, is what many would consider unconstitutional, and in my view, a complete breach of Ministerial powers.

- Does the ACT Government really believe that Canberrans are willing to allow the Minister for Planning and Sustainable Development to freely exercise such powers?
- Should the Minister believe that the use of such powers is warranted, the ACT Government is sadly out-of-touch with Canberrans, community values and adherence to all forms of natural justice.

For any Minister to make a final decision on significant development projects without the Assembly and any recourse or natural justice is simply incomprehensible and very poor form on the part of ACT Government.

Greater emphasis must be focused on significantly improving community consultation, evidence-based decision-making, accountability and the prioritising of capital expenditure, given when the parlous state of the government’s finances.

Key Issues with the proposal

Parking

The adequacy of parking provision in the proposal is extremely disappointing, given that many people at the pop-up sessions strongly supported and advocated **basement car**

parking to minimise the acquisition of valued parklands and open space. This would have supported the local shops as well.

Should the proposed health centre proceed in Griffith, your documents indicate that construction is likely to start in 2027, opening some time in 2028. Access to parking will be significantly reduced throughout this period, due to space required by construction equipment, stored materials and workers' vehicles. Like the Red Hill shops, Griffith shop owners will lose customers who cannot conveniently park and access their local shops.

Public transport

Serious doubt remains as to the proposed location, which is not easily accessible by public transport in the inner south.

Building size

The proposed health centre now appears to be a massive, two-storey building dominating the landscape of approx. 1,500m² and about 70m long, with many more staff and car parking (not basement) than originally stated and alluded to at the pop-up sessions.

With such height and scale, the footprint has an enormous and much greater impact on the parkland, open space and amenity than residents ever envisaged. The community has simply been misinformed and misled.

Security

There is no mention of any CCTV cameras and surveillance for the proposed health centre, or the Griffith shops which have experienced numerous break-ins, robberies and more recently, assault. There is also no mention of increased Police or security patrols for the proposed health centre or the Griffith shops. The proposed health centre will attract and place a target on the locality for further increased crime.

Services

I understand that services have not yet been finalised, however, the potential services identified in the proposal have very little resemblance to those services discussed at the pop-up sessions and those mentioned in the Your Say survey. Many of these services are only accessible to Canberrans who possess a concession or Health Care Card.

The proposed services could be provided at less financial and social cost by distributing them around suburban locations, on a similar pattern to private provision. How simple would it be to contract and extend the hours of existing operational private providers to meet the demand?

There is no commitment to basic radiology, ultra-sound or CT scans. This was the feedback at the popups from people who would make use of such services at a health centre.

The proposal as it currently stands, does not have provision for GPs that can make referrals or issue scripts, and no nurses, such as those provided at Walk-in Clinics like at Weston Creek.

In summary, the services offered by such a health centre in the inner south should be accessible to all and valued by the tax-paying public.

Overall, there has not been at any stage, full disclosure or transparent consultation on the proposed health centre.

The ACT public will potentially have a \$22m white elephant.

An alternative site that is accessible, not on valuable open space and provides health services the community needs, such as through a “walk-in” model, must be pursued.

Thank you for the opportunity to comment.

Your sincerely

A solid black rectangular box used to redact the signature of the sender.

19 November 2025

From: [REDACTED]
To: [Terrplan](#)
Subject: DPA-06 Health Centre in in Griffith
Date: Wednesday, 19 November 2025 11:03:18 PM

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Public consultation comments on:

Potential Territory Priority Project (TPP) for the Inner South Health Centre (proposed to be located on the corner of Throsby Crescent and Throsby Lane in Griffith)

I raise the following objections to this project being built in the proposed location:

1. By the Government constructing on land that is presently public parkland and playground equipment, these facilities are being taken away from the residents of Griffith, with no similar replacement. (The proposed Inner South Health Centre will not be a service specific to Griffith rate payers and residents who will lose their local park.)
2. There will be a loss of car parking facilities for the Griffith community in using the Griffith shopping precinct – by the Government constructing on land that is presently public car parking for users of the Griffith shops.
 - I understand a nett gain of 63 parking spots is proposed in the construction. However, this parking is likely to be swallowed up by and furthermore be insufficient for the more than 50 workers at the Health Centre and by its clients.
 - Therefore, it actually represents a loss of parking for the community in using the Griffith shopping area.
 - If a nett gain of 63 parking spots does ultimately materialise, I'd be surprised. Unfortunately, I have lost trust in construction planning consultation processes in the ACT because I have seen too many developments proposals be amended after public consultation to the point that the end construction is far more congested than what was proposed and consulted on.
 - Presently there is often insufficient parking available at the

Griffith shopping area. If there was to be insufficient parking permanently at the shops, the shops are likely to be used less and potentially then lost by being rezoned. This means insufficient provision of parking manifests sadly as a loss of local shops 'by stealth'.

- Cars parking in the suburb's streets (which are narrow streets) is not a facility; instead it presents potential traffic hazards and pedestrian accidents. There has been allowed to occur a considerable number of flats/units and multi-dwelling buildings in the suburb with insufficient parking for the cars of residents in such complexes and for the cars of their guests; these cars already spill onto many streets. It has become like playing 'dodge ball' to drive in such congested streets.
 - The fact this already happens in many Canberra suburban streets (and in many congested cities) does not mean it is 'best practice' and should not be multiplied in Canberra, thereby make our suburbs more difficult and stressful to live in.

I bring these few comments to you as a long-term resident of the suburb, not as someone who has any expertise in planning. Please use the expertise of your office to, from the start of a construction project to its finalisation, plan it wisely, plan for the long term and ensure constructions are adequate for the intended services and citizens effected – because once facilities are gone, in the long term, I and other rate payers will be paying more to 'catch up' or to ever restore.

Regards,

[REDACTED]

[REDACTED], Griffith

To: [REDACTED]
Subject: Comments - DPA06 new Griffith Health Centre
Date: Wednesday, 19 November 2025 12:10:29 PM

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Caution: This email originated from outside of the ACT Government. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Hello,

I wish to submit some comments on the proposed Territory Priority Project Declaration for the Inner South Health Centre in Griffith. I write as a local resident, living only a couple of hundred metres from the proposed site. I also write as someone who has a mild disability (vision impairment) which renders me unable to drive, and therefore an active traveller who needs local services, a particularly acute need because I am 'not disabled enough' to receive any recognition or support at all from the ACT Government when services are inaccessible or inadequate. This has been a source of almost weekly frustration and despair during a cumulative total of 30+ years as a Canberra resident over the last 42 years.

From this perspective, I was initially excited by the announcement of this new health centre, noting that many public medical services including GP/walk in clinic are effectively unavailable to people like me at present. Those facilities are nowhere near the inner south and require lengthy multi-stage travel on public transport, or around \$80-120 in return taxi or Uber fares, to reach. (I note that in your consultation document, even people who drive commented that Dickson and Weston are too far away for walk-in centres to be convenient - imagine for those of us who can't drive to them!) As such, I am effectively excluded from access to most public primary health services despite paying huge and increasing rates, from a single income, on my small unit title property.

Looking at the Project Declaration, however, walk in / GP facilities are not mentioned at all. This gives me great concern - and also seems to create the farcical situation that to access the sorts of secondary services listed that might be there, such as chronic disease management, local residents would first need to leave the area to access a walk-in clinic or bulk-billing GP in another part of town before these services across the road are relevant. Or, of course, pay very large gap fees for private GP services in inner south suburbs.

My key comments in relation to this proposal are therefore:

- I seek greater clarity on what health services will be provided in the new centre, and specifically whether this will include walk-in clinic/general practitioner access. If not, why is there no priority on the provision of walk-in access to residents of the inner south who do not have access to a car and therefore have **no** access to such services in Canberra without lengthy multi-stage travel on public transport across town, or prohibitively expensive Uber or Taxi fares? I submit that the highest priority for services to all Canberrans, including those in the inner south, should be access to primary health/GP walk-in facilities including for urgent and out-of-hours care. Assessment of reasonable access should not be predicated on the person having access to private car travel.
 - as a corollary of that, I note that if the ACT Government wants people like me not to go to Canberra hospital emergency for non-emergency health situations, we need an option. At present TCH is the **only** place I can access for urgent/out of hours care that is even vaguely proximate eg accessible in one

bus ride or an affordable Uber.

- For this development, and as a more general principle, I would plead with the ACT Government to consider as a priority, the access needs of people who do not have the ability to drive a private car to services. Priority should be given to **all** Canberrans having reasonable access to necessary basic services, including health services, including those who need to use public transport or active travel to do so. For example, a standard that no service should be more than one bus or tram segment away from all people who need it, would be appropriate.
- I welcome the inclusion in the project declaration of making health services available near rapid transit public transport and active travel routes. Noting that this centre will be next to a road (Stuart Street) with a rapid bus service from both Civic and Woden, in the zone for other active transport (such as e-scooters) and is designed to make travel accessible for residents of the **local area**, why are an additional 119 car parking spaces necessary? What will be done to make sure that people are actively encouraged to use public transport and/or active travel to utilise the centre, or to prioritise access for local/nearby residents, rather than just clogging up the Griffith shops and surrounding residential streets with people coming to the centre in cars from elsewhere? Will those of us resident in the local area be expected to battle through lines of cars along our residential streets and access points and [I ask as a vision impaired bicycle commuter] the associated dangers of streams of traffic driving in and out, and trying to park on the street outside my house? Will local area residents have priority access to the services at the centre? Will the development be accompanied by appropriate facilities to encourage and support active travel such as new bike lanes/paths, bike parking and other end-of-trip facilities?
- I submit that approval of the present development should be conditional on an undertaking that Blaxland Park, on the other side of the Griffith shops behind the community centre and Baptist Care, is **never** to be rezoned or developed and must be retained as local community green space in perpetuity.

Finally, I wanted to offer an observation on the consultations undertaken so far, according to your consultation document. It shows six face-to-face consultations held but all but one were held during working hours, which necessarily means that you have self-limited your consultation to a cohort of non-working people, aside from maybe a few drinkers at Eastlake pub one Thursday night. I am also part of the YourSay panel and a Griffith resident, but received none of the online comment options mentioned in your consultation document. There seems therefore to be some deficiency in your consultations reaching the people they need to and attracting meaningful feedback. I do acknowledge receipt of the letterbox dropped leaflet, which thankfully alerted me to this process just in time to submit at this late stage.

I would be happy to discuss the points I have raised further as required. In fact, as someone representing a marginalised minority group (non-drivers) that is routinely ignored by the ACT Government in planning decisions, I would welcome it.

Thank you for the opportunity to comment.

Yours sincerely





Territory Planning Authority
GPO Box 158
Canberra ACT 2601
terrplan@act.gov.au

Dear Territory Planning Authority

DPA-06 – Inner South Health Centre, Griffith

I provide the following comments on the proposed re-zoning of land behind the Griffith Shops for the proposed Inner South Health Centre.

Rezoning

I oppose the ACT Government's Major Plan Amendment (DPA-06) for Blocks 33 and 39 of Section 78 Griffith to re-zone Urban Open Space (PRZ1) to Community Facility (CF). This area of limited urban open space, mature parklands, flora and fauna is highly valued by the Griffith community and is simply irreplaceable. Rezoning parkland to construct a large health centre in Griffith is not acceptable.

Location

Health Centres across the ACT are located in major Town Centres or large hubs (e.g. Weston Creek at Cooleman Court). Town Centres are central, well serviced by public transport (catching a single bus from the suburbs), have plenty of parking and provide an easily accessible environment for families and those with mobility issues.

The proposed site in the suburb of Griffith, behind the small, village-like shopping centre is not appropriate. The Inner South Health Centre would be better located on community facility land in Manuka, Kingston, the Kingston Foreshore, Eastlake (near the Kingston Railway Station) or even Narrabundah near the large Indigenous health centre. Additionally, the size and scale of the proposed health centre and no underground parking will result in the destruction of a large part of the community's parklands, trees, flora and fauna.

Consultation

I recently became aware of the Inner South Health Centre proposal through the local community association - the GNCA (newsletter, flyers, pop-ups at the shops, emails). There appears to have been very limited consultation by ACT Government which I understand was mostly online with government websites, YourSay and social media. A meeting with the local community in the Griffith Hall would have enabled a more inclusive and open consultation to occur with local residents from the outset, together with other meetings across the entire inner south area.

Services

The residents of the inner south require a walk-in health centre similar to that in Weston Creek. It appears that the current proposal offers a great deal of dental services and highly specialised post-acute care and support, and chronic disease management. Many inner south residents already access their own private providers for such treatment.

The proposed services appear to be available for those using concession cards only. As such, these services should be located where patients can best access them. Griffith is not such a location.

I also understand that this health centre is costing \$22m. Doesn't ACT Government already have a huge deficit? The proposed health centre and limited range of services does not represent value for money.

Territory Priority Project

Under no circumstances should ACT Government contemplate the Inner South Health Centre becoming a TPP. ACT residents/stakeholders, particularly those in the inner south, pay significant amounts of rates to live in the area and therefore should be able to comment on major development proposals (at the DA stage) in their area.

Conclusion

1. Do not build a health centre in Griffith behind the shops.
2. Do not re-zone. Protect our very limited urban open space, flora and fauna, parklands and mature trees, as has been the case since 2008.
3. Locate the Inner South Community Health Centre on community facility land only, in larger centres such as Manuka, Kingston, the Foreshore or Eastlake, or near the existing Indigenous health hub in Narrabundah.
4. Undertake a full consultation process with residents across all areas of the inner south.
5. Deliver an appropriate health centre (walk-in) with services that residents want and will use, not what is currently being proposed.
6. Do not make this a TPP under any circumstance.

Thank you for the opportunity to comment.

Yours sincerely



10 December 2025

Territory Planning Authority
GPO Box 158
Canberra ACT 2601
terrplan@act.gov.au

Dear Territory Planning Authority

Proposed DPA-06 – Inner South Health Centre, Griffith

I wish to provide comment on the proposed re-zoning of land behind the Griffith Shops and the proposed Inner South Health Centre.

Rezoning

ACT Government has proposed a Major Plan Amendment (DPA-06) for Blocks 33 and 39 Section 78 Griffith. This is to permit the re-zoning of Urban Open Space (PRZ1) to Community Facility (CF) zoning to permit this proposal to proceed. This limited urban open space, parklands, flora and fauna are far too scarce and is highly valued by the communities of Griffith and Narrabundah to be re-zoned. This very limited parkland is simply irreplaceable! It is my firm belief that any health centre should be built on community facility land only. Rezoning parkland is not an acceptable method to achieve this outcome.

The size, scale, bulk and footprint of the health centre with *no underground parking* in an effort to mitigate the destruction of the community's parklands, trees, flora and fauna and open space is inconceivable to ALL.

Location

Health Centres across the ACT are located in major Town Centres or large Hubs (Weston Creek-Coolman Court). The Inner South Health Centre is not suited or well located in a suburb like Griffith. Town Centres are central and well serviced by public transport (catching a single bus from the suburbs), plentiful parking with dedicated disabled parking and provide an accessible environment for families with prams and those Canberrans with mobility issues.

I would suggest that the Inner South Health Centre would be better located on community facility land situated in Manuka, Kingston, the Foreshore, Eastlake (near the Kingston Railway Station).

Consultations

The first I became aware of the Inner South Health Centre proposal was through our local community Association-the GNCA. Based on the Associations, informative, interactive stand, local residents were sharing their views and opinions of the proposed re-zoning. It is very clear that the proposed site is not popular, appropriate nor are the proposed services of the health centre currently on offer. They bear little resemblance to the valued services offered at the Weston Creek Health Centre which I am familiar with.

Some residents at the Griffith shops (who attended a Government led *dot* pop-up stand one day) stated that these minimal Government consultations (that I was unaware of) directly referenced Walk-in treatment services, with nurses, X-ray and ultra sound services and extended hours for Canberrans to attend just like Weston Creek. It would appear, even though stated by these officials, this is not applicable?

Of great concern, why wasn't there a public community meeting at the Griffith Hall? It would appear that most of the consultation took place on-line with Government websites, YourSay and social media. Not all residents and community members have access or rely on this form of

communication. At the very minimum, their needs to be a public meeting and several letterbox drops advertising the consultation process for meaningful, inclusive and full, open consultation to occur.

The ACT Government should perhaps consider a transparent consultation process for all inner south residents to comment. Perhaps over a three-month period commencing in March 2026. Not during the Christmas period and school holidays as is so often the case.

Some were stating that this health centre is an outlay of \$22m? This is NOT value for money.

Health Centre Services

I touched on the proposed services, or lack thereof. The residents of the inner-south require a health centre similar to Weston Creek. It appears that the current proposal offers a great deal of dental services and highly specialised post-acute care and support, rapid access clinics and chronic disease management, which many local inner south residents access their own private providers for treatment.

The proposed services on offer appear to be only available for those using health care, pension and concession cards. These services should be located where patients can best access these services. It is not in Griffith, following the sale and demolition of the majority of public housing for example Gowrie Court, the Stuart Flats and the sale of many public housing dwellings for land value across Griffith and Narrabundah.

Territory Priority Project

Under no circumstances should ACT Government contemplate the Inner South Health Centre becoming a TPP.

Conclusion

1. Do not re-zone or build a health centre in Griffith
2. Protect our very limited green, urban open space, flora and fauna our parklands and trees as is the current situation since 2008
3. Locate the Inner South Community Health Centre on community facility land only in Manuka, Kingston, the Foreshore or Eastlake
4. Undertake a full consultation process with resident across the inner south
5. Hold a well-advertised letterbox dropped public meeting to listen first hand to the communities concerns and wishes
6. Deliver a health centre service that residents want and will use, not what is being currently proposed.

Thank you for the opportunity to comment.

[REDACTED]
[REDACTED]

10 December 2025