

## Submission:

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

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

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

3 March 2023

### Abbreviations:

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

## **Introduction**

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

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

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

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

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

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

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

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

## **I Trust, faith, credit, credibility needed now**

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

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

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

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

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

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

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

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

6 Increasing public trust and faith in the new system's ability to deliver improved (yet to be in defined), outcomes must be a key and measurable priority for the AC T government from now on

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

4 General comment about amending the INDS

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



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

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

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

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

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

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

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

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

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

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

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

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

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

## **VII Some comment on the full 'Draft District Strategy - Inner North and City' (INDS)**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

## 10 Maps/figures in the strategy

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

## 11 Civic and Dickson pools are briefly mentioned on page 117

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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



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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

#### 6 What district planning needs:

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

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

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

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

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

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

## **XI Urban heating, treeing, and district planning**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

planning directorate

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

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3 March 2023