

EOI to the Standing Committee on Planning, Transport and City Services - Inquiry into the Territory Plan and other associated documents

I am writing on behalf of the Braddon Collective and outline the reasons below as to why I would like to speak to the Committee on identified aspects of the new Territory Plan.

The over-arching objective of the Braddon Collective is to seek input from, and work collaboratively with, businesses, landowners, residents and the ACT government to maintain the diverse and vibrant character of Braddon, and enhance the environment for those who live, work and play in Braddon.

1. Zone Policies and Technical Specifications: Restrictions on billboards and advertising hoardings

This submission reflects our concerns regarding **signage controls** which are heavily reduced in the Territory Plan 2023 in comparison with the [Signs General Code](#) in the Territory Plan 2008. The ACT Government must make a clear policy statement that Canberra will remain ad-free under the new Territory Plan.

The Signs General Code under the current Territory Plan has enabled Canberra to remain free from large billboards and third party advertising. **The Territory Plan 2023 replaces the Signs General Code with just one assessable outcome (one sentence) across all Zone Policies:**

"12. Any advertising or signs are suitable for their context and do not have a detrimental impact on the surrounding area (for instance due to size or light emission)."

It is noted the optional **technical specifications** have the same assessment outcome and provide limited further guidance. The technical specifications of most relevance to Braddon are the [Planning \(Commercial Zones\) Technical Specifications 2023](#) and [Planning \(Residential Zones\) Technical Specifications 2023](#). We are concerned about the lack of guidance provided in the Planning (Commercial Zones) Technical Specifications 2023 and the fact that the technical specifications relating to signage are optional and not mandated. Specification 12.1 in the Commercial Zones Technical Specifications, for example, provides location and size restrictions for signs (this table is a direct cut and paste of Table 2 from the Signs General Code), however there are no definitions to explain the terminology of Principal, Second Party and Third Party advertising used in the table. There is a significant risk that assessable outcome 12 and Specification 12.1 for commercial zones will not be enough to continue to protect Canberra from large, intrusive advertising hoardings.

I further note that [Planning \(Exempt Development\) Signs Development Control Declaration 2023 \(No 1\)](#) lists the types of signs that cannot be exempted under this Development Control, namely:

- (8) The following types of signs are not exempt from development approval:
- a) illuminated signs
 - b) animated or flashing signs
 - c) highly reflective signs
 - d) digital changeable signs (refresh rates)
 - e) billboards
 - f) signs that extend outside the outline of a building structure on high-rise buildings.

It seems counter-intuitive that the types of signs listed here are not referenced at all in either the residential or commercial Technical Specifications (or the various Zone Policies).

We call for specific policy outcomes that will maintain an ad-free Canberra. This could be achieved by adding mandatory development controls to the various Zone Policies. These controls should, at a minimum list, the **types of signs that should be prohibited** under the Territory Plan (such as large illuminated signs, animated or flashing signs and signs that extend beyond the outline of a building).

Recommendations:

- Definitions are included in the *Planning (Commercial Zones) Technical Specifications 2023* to support the table at Specification 12.1. Preferably this table should be moved to the various Zone Policies as a mandatory development control.
- The list of types of signs not exempt from development approval (see list above) should become a list of the **types of signs that are prohibited** under the Territory Plan. This list should be added to all Zone Policies as a mandated development control.
- Criteria C4 and C6 of the Signs General Code are carried across into the Zone Policies as mandated development controls to strengthen the restrictions on large, illuminated advertising hoardings.
- That the ACT Government makes a clear policy statement that Canberra will remain ad-free under the new Territory Plan.

2. Inner North and City District Strategy: Removal of the public overlay from the Braddon Oval

The Braddon Oval has not been marked as a public land sport and recreation reserve in the mapping for the Inner North and City District Strategy, continuing the abolition of the characterisation of this oval as public land enacted earlier this year (without any public consultation) through a technical amendment to the Territory Plan which removed the public land overlay from both the Braddon and Ainslie ovals.¹

FOI 23/081638 (dated 9 October 2023) makes reference to further residential development on the Braddon oval, and such development is being prioritised over the preservation of open green space which is zoned for recreational purposes.²

We note the Inner North District Strategy mentions undertaking a “detailed localised analysis to inform and confirm the need for new community and recreational facilities in Inner North” and making sure “sufficient land (or floorspace capacity) is identified and preserved for social and community uses”. The removal of the public land overlay from the Braddon and Ainslie Ovals was not subject to such analysis prior to the Technical Amendment being enacted.³

Recommendations:

- Reinstate the public land overlay to both the Ainslie and Braddon ovals in the Inner North and City District Strategy mapping.
- That the ACT Government makes a clear policy statement regarding the preservation of sport and recreation reserves and protects these green open spaces from residential development.

3. Inner North and City District Strategy: Characterisation of land subject to mixed-use development as urban open space

The mapping for the Inner North and City District Strategy characterises the former site of the Northbourne Flats and the Turner site (Braddon: Block 10, Section 8; Turner: Blocks 3 & 4, Section 57) as **urban open space**. These blocks have been sold by the Suburban Land Agency to private developers for residential/commercial development and, accordingly, should not be labelled urban open space. A DA for the Braddon block is currently under assessment, and DAs for the Turner blocks are to be lodged this year.

Recommendation:

- Remove the label ‘urban open space’ from Braddon: Block 10, Section 8 and Turner: Blocks 3 & 4, Section 57 in the Inner North and City District Strategy mapping.


on behalf of the Braddon Collective

¹ Technical Amendment to the Territory Plan 2023-03 available at <https://www.legislation.act.gov.au/View/ni/2023-215/20230428-80826/html/2023-215.html>

² See FOI response which can be found at <https://www.environment.act.gov.au/about-us/access-government-information/disclosure-log/disclosure-logs/EPsDD-23081638>

³ Page 35, volume 3, Inner North District Strategy.