

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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