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Dear planners and others,

NATIONAL CAPITAL DRAFT PLAN AMENDMENT 102 – HUME CIRCLE PRECINCT

1. The Griffith Narrabundah Community Association (GNCA) welcomes the opportunity to comment on this issue. On 3 February 2026 the GNCA lodged an interim submission in relation to the NCA Draft Plan Amendment 102 – Hume Circle Precinct, which foreshadowed a fuller submission by the then extended closing date of 17 February.
2. This is that fuller submission, and gives the GNCA’s assessment of the issues raised by the NCA’s Draft Plan Amendment 102, and makes recommendations for action by both the NCA and the ACT Government. Those interested in the background to these views are urged to read the attached Discussion at Attachment A.
3. Before we go further the GNCA wishes to record its extreme disappointment with the conduct of the NCA ‘s consultation over Amendment 102. This was organised at an inconvenient time with a compressed timeframe¹ to fit a tight schedule created by the NCA itself. But as we now know, the proposal has been in the works for 3 years, so what is the rush? Many will think this was motivated by a desire to minimise public attention. This is inconsistent with the NCA’s declared principles, and casts doubt on the NCA’s good faith in dealing with the public.

¹ The consultation was advertised on Monday 5 January, the day Government offices reopened after the Christmas/New Year shutdown, and in the middle of the summer break for most Australians. Consultation was to close on 3 February, and was only extended to 17 February after an appeal from the ACT Chief Minister.

4. Between the initial 3 February 2026 closing date for consultation and the later extended date of 17 February it has become clear that the proposal to expand NCA control over the blocks surrounding Hume Place was not, as had been presented at a meeting with the NCA on 15 January, an idea that arose entirely within the NCA, but that it was something that had been discussed with at least some property developers over the past three years. This entirely changes the optics of the proposal, and raises a number of issues about probity and governance.
5. The GNCA notes that were the proposed precinct to be developed to its maximum extent, it is likely that it would involve roughly 9,400 apartments housing roughly 19,000 people with roughly 14,000 cars. We would welcome more accurate estimates from the NCA, together with the underlying assumptions, but believe that such an analysis may not have been made. Whatever the actual numbers clearly this is not a trivial endeavour and raises serious concerns about its likely impact.
6. The GNCA finds the justifications for the proposal put forward by the NCA completely unconvincing. Even if there were valid reasons for the redevelopment of those blocks north of Wentworth and Canberra Avenues, the inclusion of those already developed blocks south of these avenues is unnecessary and at best cynical. It might be that this area was included to give the proposal an association with the Griffin's vision for Eastlake Circle and its surrounds, and possibly as an opening gambit to have something to give up in subsequent negotiations. Unfortunately it has been the cause of much anxiety and distress among the residents of this area.
7. The GNCA believes that Draft Amendment 102 should be withdrawn by the NCA.
8. Where the NCA feels that there is sufficient cause to become involved in planning a precinct, it should issue an overlay to be complied with, on top of any planning controls applied by the ACT. The Commonwealth chose to withdraw from administration of the ACT in 1989 because the costs and administrative burden of providing municipal and state government level services did not sit well with its role as a national government. Irrespective of the NCA's views, why the Commonwealth would wish to reopen this issue is not clear. The GNCA believes that it would not be a good idea to have two jurisdictions with independent planning authority over adjacent parts of the ACT.
9. The GNCA believes that the possible redevelopment of the blocks north of Wentworth and Canberra Avenues should be undertaken by the ACT Government, in conjunction with planning for the adjacent areas of Causeway, the rail yards and Eastlake. With good planning it might be possible to disperse this large additional population over a wider area with lower rise and less intrusive developments. Purely by way of example, the GNCA notes that developing that portion of the proposed Hume Circle precinct north of Wentworth and Canberra Avenues to 7-storeys, the typical height for existing developments in that portion of

Griffith between Canberra and Wentworth Avenues, would result in a population of about 7,500 and a car parking requirement of about 5,635 spaces.

10. The GNCA notes that a full-scale redevelopment of the blocks south and west of Dalby St and Mildura St. might imperil the food industry focus of the West Fyshwick Industrial Area, including the Fyshwick Markets, unless this is well managed, well planned and with strong community and business engagement.
11. The GNCA notes approval by the Minister of this proposal from the NCA would set a very dangerous precedent for the ACT, threatening its planning powers and its ability to collect revenue through lease betterment fees. This is particularly so if NCA control means that ACT Planning rules and lease controls no longer apply to a NCA precinct.
12. The GNCA remains unconvinced that the *Australian Capital Territory (Planning and Land Management) Act 1988* (the Act) really does give the NCA the power to unilaterally take over the planning of any portion of Canberra adjacent to an approach route. If it had been the intention of the drafters of the Act that the NCA undertake general property development not associated with national purposes, then surely Authority would have been called something like the National Capital and Development Authority or NCDA. The GNCA would welcome the NCA releasing any legal advice that it has in this regard about its powers under the Act.
13. The GNCA believes that the NCA does not fully appreciate the magnitude of the task it proposes to embark upon, does not have the necessary skilled staff it would need to undertake its expanded role, and is unlikely to be granted the funds by the Commonwealth to make good these shortfalls.

RECOMMENDATIONS

The GNCA recommends that:

- 1) The NCA should immediately withdraw Draft Amendment 102 to the National Capital Plan;
- 2) All of Narrabundah, and those areas of Griffith and Kingston south of Canberra and Wentworth Avenues should not be included in any future NCA and ACT redevelopment plans;
- 3) The NCA should immediately commence open and public discussions with the ACT Government and its planning bodies about the redevelopment of the Griffith Industrial Area² and the West Fyshwick Industrial Area³, in conjunction with ACT development plans for the railway yards, Causeway and East Lake;
- 4) Any future planning by the NCA and the ACT relating to the Hume Circle area identify all the physical and social infrastructure required to support the proposed level of development, and develop detailed explanations of how such infrastructure is to be provided and how it will be funded;

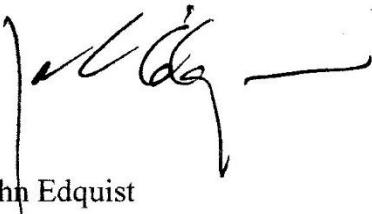
² See the Griffith Precinct Map and Code

³ See the Fyshwick Precinct Map and Code

- 5) Both the NCA and the ACT Government and Planning Authority keep the ACT public fully informed about all developments in contemplation in relation to Hume Circle, Causeway, the railway yards and Eastlake;
- 6) Any unsolicited development proposal received by the NCA be reported to the public within 7 days of receipt;
- 7) The NCA immediately publish any legal advice in its possession relating to:
 - a) its powers to expand its area of jurisdiction adjacent to main avenues and routes of approach; and
 - b) how the NCA should properly respond after receipt of an unsolicited development proposal;
- 8) The NCA appoint an independent consultant as Integrity Auditor to investigate whether there have been any breaches of probity or proper governance in relation to the Hume Circle Precinct proposal, and in particular:
 - a) whether the NCA should have revealed to the public its prior discussions with developers before releasing Draft Amendment 102 for public consultation;
 - b) whether the proposal is an Unsolicited Proposal, and whether the correct ACT and/or Commonwealth procedures been followed; and
 - c) what actions should be undertaken by the NCA to ensure that any probity and governance failure identified do not recur;
- 9) The NCA publish and fully implement all recommendations arising from this investigation;
- 10) The ACT should make inquiries to establish whether:
 - a. The NCA has the authority to undertake a general planning role over blocks with no national significance, and particularly over those which have no frontage on to Canberra Avenue;
 - b. Implementation of the proposal could lead to a loss to the Territory of Lease Variation Charge (LVC), or other revenues.

A discussion of these issues is attached art ATTACHMENT A.

Yours sincerely



John Edquist

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15 February 2026

DISCUSSION

Summary of the proposal

14. Amongst the Designated Areas that the NCA has responsible for are “the Main Avenues and Approach Routes between the ACT border and the Central National Area.” This includes Canberra Avenue in its role as a route of approach to the Parliamentary Triangle. This power has been used to control the set-back, building height, and façade of buildings fronting on such main avenues (albeit ineffectively in relation to Manuka Circle).
15. On 5 January 2026 the NCA released “Draft Amendment 102 Hume Circle Precinct” (Amendment 102 document), which proposed to amend the National Capital Plan to give the NCA planning control over not just the front of blocks facing onto an “approach route” but to dramatically expand this into a precinct covering all land between the centre of Hume Pl and:
 - McMillan Crescent south of Canberra Ave.
 - East of the northeast running arm of Leichhardt St, and 113 and 115 Canberra Ave.
 - South of Mildura St and West of Dalby Ave.and to impose circular zones of various permitted building heights to emphasise the Griffin’s original plan, while leaving a clear sight-way up the Causeway toward Mt Ainslie. The NCA did not propose to acquire any land, and any block amalgamations and other land changes were to be done by present or future landowners.

NCA’s justification for proposal

16. The justification for this proposal was “the renewal of an existing urban area in a manner consistent with the Griffins’ Plan for Canberra and to improve housing supply supporting the national agenda”.
17. The Australian Capital Territory (Planning and Land Management) Act 1988 gave the NCA a quite specific role “to prepare and administer a National Capital Plan” The plan advises that “Designated Areas” exist to enable three roles: Canberra’s role as the National Capital with national functions; the Griffins symbolic design for Canberra; and Canberra’s landscape setting and layout as the “Bush Capital”.
18. While it may be that both the current Commonwealth and Territory Governments are keen to encourage increased housing density this is a relatively transient phase which will abate as immigration declines with falling global population. There are no aspects of a proposal to construct high rise residential towers around Hume Place that have a uniquely national character. This would merely be a re-enactment of developments visible in other parts of Australia and many overseas countries. Future generations would be very critical of those who trashed the Garden City for such little gain.

19. The NCA's Amendment 102 document explains and tries to justify the proposed amendment. The document invokes Walter Griffins 1918 writings to suggest that the Griffin's envisaged Eastbourne Circle (Hume Circle) would be a "major gateway and activity hub, and to link the area to the city through a scenic rail approach route along the Causeway" and indicates that "(t)here is opportunity to reestablish the original Griffin intent" through introducing for Hume Place "a planning and design framework that provides a memorable and distinctive sense of arrival for visitors as well as for people who pass through daily. As an approach route that leads into the National Capital, it serves as a symbolic gateway experience for those arriving at the city."
20. Given the many major developments that have occurred in the 108 years since Griffin wrote about his hopes for Eastlake Circle, in an as yet inchoate national capital, it is hard to see why Hume Place has been singled out as the starting point of a reimposition of Griffin's dreams on Canberra as it has developed in reality. Wenworth (Interlake) Avenue does not link two lakes, neither does the Causeway conduct a scenic train line across the lake to the civic centre. If Hume Circle is a gateway, it is to the industrial suburbs of Fyshwick and Beard, and Canberra's exurbs of Queanbeyan, Jerrabomberra, and Bungendore, and the Far South Coast.
21. Neither the Causeway sight line nor the arcs completing the circle sketched in part by McMillan Crescent, the stub end of Leichhardt St, and the start of Mildura St, or the inner circle suggested by Hely St, will be roads, but merely grassed open areas. It seems likely that that these hints at Griffin's circular geometry would not be particularly visible at ground level because of the surrounding 12 and 15 storey developments and it may be only apparent from the air. Furthermore, the revelation that the NCA has been engaged in discussions with a development consortium about the rezoning of this area for the last three years suggests that invoking the Griffins' memory and dreams is just a smokescreen.
22. The GNCA finds the justifications for the proposal put forward by the NCA completely unconvincing. The Amendment 102 document was an opportunity for the NCA to explain how the proposed development was a suitable location for the high-rise developments proposed, but apart from noting the ACT Government's enthusiasm for higher density developments, singularly fails to do so.
23. The GNCA believes that the possible redevelopment of the blocks north of Wentworth and Canberra Avenues should be undertaken by the ACT Government, in conjunction with planning for the adjacent areas Causeway, the rail yards and Eastlake.

The Precinct: Facts and Figures

24. The proposed precinct comprises 33 blocks with an area of 204,684 m², or 20.5 ha. There are 22 blocks north of Wentworth and Canberra Avenues with an area of 112,683 m² or 11.3 ha, while there are only 11 blocks in the southern sector with an area of 92,001 m² or 9.2 ha.
25. Current land use in the precinct is quite varied. There is a marked contrast between that part of the precinct north of Wentworth and Canberra Avenues, and that to the south. The northern portion of the precinct is industrial and commercial land which it would seem logical to plan to redevelop in coordination with the ACT Governments plans for East Lake, Causeway and the former rail yards.
26. The area to the south of Wentworth and Canberra Avenues is already well developed with apartments of varying heights. The blocks along McMillan Crescent between Canberra and Sturt Aves are zoned CZ2 Commercial Zone but have 2, 3 and 4 storey apartments. Residential use is one of the permitted uses in the CZ2 zoning. Two of the blocks in this area were previously occupied by a motel and a hotel. The area between Sturt and Canberra Aves is zoned CF (Community Facilities) and is occupied by St Clare's College. The blocks east of Leichhardt St and south of Wentworth Ave. are zoned CZ2 and are 4, 6 and 7 storey apartment buildings, and the 2 storey Ramada Diplomat Hotel.
27. There are 546 apartments in the area south of Wentworth and Canberra Aves, suggesting the resident population would be about 1,100 people. The area can scarcely be described as being in need of renewal. On the south side the Griffin legacy of the sightline to Mt Ainslie (straight up Sturt Ave.) and the circular geometry of McMillan Crescent is clearly visible, suggesting that the invocation of the Griffin plan is nothing more than a ritualistic invocation of a respected founder figure. The benefits of including this area in the proposed precinct is hard to see, as the only beneficiaries would be those developers who managed to aggregate a sufficient holding in any of the apartment complexes to eventually build a 12 or 15 storey building.
28. The blocks north of Wentworth and Canberra Aves are zoned CZ2 if facing Hume Circle or Canberra Avenues to about halfway between Leeton and Dalby Streets. Blocks further to the east on Canberra Ave, and those not fronting on to it, are IZ2 (Industrial Mixed Use) but are either one or two storey industrial or commercial structures or vacant lots. A significant portion of this area has not been used since the closure of the Canberra Milk factory and distribution centre in 2023. There appears to be only one residence in the area, the house at 18 Mildura St. The estimated residential population would consequently be 2.

Possible Threat to the Canberra Markets?

29. IZ2's Zone Objective L refers explicitly to the West Fyshwick Industrial Area, and aims to encourage the area's "role in food processing, wholesaling, distribution and marketing". In

addition, we note that multi-unit residential use is prohibited in IZ2, so that absent of a significant change to the Territory Plan, these IZ2 blocks could not be redeveloped as residential towers. Such a change in the plan would require a reversal of a long-standing commitment to the role of food associated activities in the West Fyshwick Industrial Area. While the Fyshwick Markets lie just outside the proposed precinct boundary running along Dalby St, the Zone Objective covers the whole of West Fyshwick to Jerrabomberra Creek to the east, and applies to retail outlets outside the proposed Hume Circle precinct such as the Fyshwick Markets and Jim Murphy's Market Cellars.

30. The zoning for the Territory Plan's West Fyshwick Industrial Area could not be changed without impacting such businesses. Transference to the NCA of planning control over West Fyshwick west of Dalby St would remove the need for a contentious and possibly troublesome zoning change, if the ACT Government had already come to the conclusion that redevelopment of this area for multi-unit residential use was a desirable outcome. What the long-term impact on the Fyshwick Markets of a hedge of 12-story residential towers across Dalby St is not clear, but the GNCA is of the view that Territory planning for the future of the West Fyshwick Industrial Area should aim to maintain this desirable mix of retail outlets over the longer term.

Implications of the Proposal

31. The building heights proposed for the various segments of the precinct are indicated in Figure 147 (at p.25) in the NCA's Amendment 102 document. Back of the envelope calculations based on this plan suggest total areas of 6,060m² for 3-storey developments, 35,980m² for 8-storey developments, 26,270m² of 12-storey developments, and 90,050m² for 15-storey developments. This totals to 158,360m², close to the area of 158,353m² for the blocks in the precinct after excluding the St Clare's site, suggesting these estimates are reasonable.

32. How many apartments might we expect to see built on this area? The area between Leichhardt St and Hely St is fully developed with apartment blocks, and the average area per apartment (ie the area of the site multiplied by the number of storeys divided by the number of apartments) is about 210m². Using this number, we can estimate that when fully developed the precinct will have about⁴:

- 9,390 apartments (about 90 in the 3-storey transition zone, 1,370 in the 8-storey zones, 1,500 in the 12-storey area along Dalby and Mildura Streets, and 6,430 in the 15-storey zones);
- If each apartment had 2 residents the population would be 18,780, say 19,000; and
- A requirement for parking for 14,086 vehicles.

⁴ These are the most likely figures. We can arrive at a plausible maximum possible number if we assume that developed can increase the density so that there is one apartment per 140m², or half the site space available with the minimum 2-bedroom apartment size of 70m². This yields a maximum of 14,085 apartments with a maximum population of 28,170, and 21,129 cars.

33. We would welcome any refinement of these estimates from the NCA or the Jega Consortium, together with the assumptions that these are based on.
34. On the figures above the proposal would effectively increase by one and a half the population of the inner south (to considerably more than Woden, but still less than north Canberra) and increase the number of cars by 70%⁵. Even if the above estimates are an overestimate, the development would be the equivalent of adding several additional suburbs to the inner south⁶. At the very least there would be a need for probably one new high school, at least one new primary school, new preschools, and an increase in local retail outlets. Given how intensively it is proposed to develop the precinct these supporting facilities would have to be located outside, but close to, the precinct.
35. This proposal would clearly be completely transformative, although not necessarily always positive in its consequences. It seems very doubtful that the existing physical and social infrastructure in the inner south would be able to cope with such a surge in population, and clearly a lot of planning, and Government and commercial investment will be required. A development of this size (unless very significantly reduced) would also seem to make any further development of Causeway, the railway yards and Eastlake unnecessary.

Does the NCA have the authority to assert control over this precinct?

36. The Australian Capital Territory (Planning and Land Management) Act 1988 gives the NCA the power to amend the National Capital Plan (s.23) but it is by no means clear that the Authority's control over "Main Avenues and Approach Routes" extends over anything behind the façade⁷ of any buildings fronting onto any route declared a Designated Route, let alone blocks which have no frontage onto such a designated route, such as those fronting onto Wentworth Ave (see below), Hely St, Leichhardt St, Mildura St, Dalby St, and McMillan Crescent. This is particularly so with Mildura St, which runs off Wentworth Ave but does not connect with Canberra Ave. until close to where Canberra Ave crosses Jerrabomberra (Milla) Creek, about 850m from Hume Circle.
37. The GNCA also notes that while the National Capital Plan, under paragraph 4.15 Main Avenues and Approach Routes Precinct Code 4.15.1 Precinct Location, lists Canberra Avenue west of Hume Circle as a "Main Avenue" and east of Hume Circle as an "Approach Route", Wentworth Avenue appears on neither list. The basis of the NCA's claim of authority over blocks or portions of blocks facing this road between Mildura St and Hume Circle is therefore unclear.

5 The ABS statistics from 2021 indicate there were about 16,000 dwellings, 31,600 residents, and just under 20,000 cars in the entirety of inner south Canberra.

6 The 2021 populations of Yarralumla, Deakin, and Red Hill were 3,120, 3,124, and 3,146 respectively.

7 On Manuka Circle, for example, the NCA has rules covering the setback; building height; and building façade, including such features as design, building material, and finishes, articulation, and the location of entrances. The NCA also asserts control over landscaping in the setback zone between Manuka Circle and the building.

38. We also note that this paragraph specifies “The Main Avenues covered by this Precinct Code are identified in Figure 126 and the Approach Routes identified in Figure 127. The Main Avenues include the land within the boundaries of the reservations of the following roads” ... and “The Approach Routes include the land within the boundaries of the reservations of the following roads”. How this is interpreted as extending the NCA’s authority beyond the boundaries of the respective road reserves is again not clear.
39. If this unilateral expansion of the NCA’s authority is accepted, then large portions of Canberra near any currently recognised Designated Area could be suddenly removed from the Territory’s control. No doubt evading the burdens of the Territory Plan would be attractive to at least some developers, and the NCA should look forward to a steady stream of requests for the creation of new precincts.
40. The amendment could thus set an unfortunate precedent, and lead to a situation where decisions by the NCA could lead to an obligation on the Territory to provide necessary support services and facilities. The Territory’s problems with the development of Brindabella Park at Canberra Airport gives an indication of the potential problems that can arise when planning responsibilities are split between two jurisdictions.
41. It seems very likely that the NCA Board would have sought legal advice to confirm that it did indeed have, under the ACT, the powers it proposes to use in Amendment 102, and we look forward to the release of any such legal opinions.

Pre April 2025 contact with Jega Group

42. It is clear from the NCA Board meeting minutes posted on the internet that the NCA had been discussing this proposal with a developer, the Jega Consortium, since at least December 2024, and probably considerably earlier. This was confirmed when the Canberra Times of 9 February 2026 where John Gasson, a director of the Jega Consortium, was reported as saying that “The consortium spoke with the NCA about three years prior to February 2026 because the authority had jurisdiction of the Hume Circle as an approach point for Canberra”, implying that the consortium first contacted the NCA in early 2023.
43. For reasons which have not been placed on record the NCA chose not to refer to these lengthy discussions with the Jega Consortium when releasing the Amendment 102 proposal on 5 January 2025. This raises two issues.
44. Firstly, there is a probity issue in that other potential purchases of blocks in the proposed precinct area would have been unaware of the possible change in zoning. The change from mixed industrial to residential and the concurrent significant uplift in permitted building heights, would be applicable not only to the CZ2 and IZ2 zones north of Wentworth and Canberra Avenues, but also to the already developed CZ2 areas south of these avenues where apartment building heights are currently limited to levels significantly lower than those

proposed. Such an increase in permitted building heights can lead to an increased value for a block.

45. Secondly, *prima facie* (especially given Mr Gasson's statement) this would appear to be an unsolicited proposal. The ACT has Guidelines on how government bodies are to treat such proposals to ensure that governance and probity issues are appropriately managed. We look forward to the NCA producing documentation to demonstrate that these guidelines have been complied with. It is possible that the NCA might assert that it is not bound by the ACT's Guidelines as it is (in law at least) a Commonwealth body. However, it seems likely that the Commonwealth would also have guidelines on how to deal with unsolicited proposals, and we would expect that if the NCA chooses this approach, it makes public what these Guidelines are and demonstrates how it has dealt with this issue. We expect that the NCA Board, being conscientious and cautious, will have sought legal advice to ensure that its actions were appropriate.

Applicability of ACT Planning Law

46. It would seem that the NCA (and the Jega Consortium) are of the view that making the proposed precinct a "Designated Area" will remove it from the application of Territory Planning legislation and rules. If this is correct the ACT stands to lose a substantial amount as the Lease Variation Charge (LVC) applicable on upgrading a block from IZ2 to CZ2 (which permits multi-unit residential) is likely to be quite significant. There may also be other fees and charges which the ACT will fail to receive were this proposal to proceed, but we lack expertise in this arcane field. However, if there is a risk of loss of funds, we would expect the ACT Government to make public an itemised list of any such losses before permitting the proposal to proceed.

47. If it is confirmed that the ACT will miss out on some revenue then there is a case that the Commonwealth, of which the NCA is an agency, should compensate the ACT for any loss of funds. We could certainly do with the money!

To what extent was ACT Government aware of and supportive of the NCA proposal?

48. Although the NCA has apparently stated that the ACT Government is aware of and supports the proposed precinct we are not aware of any statement from the ACT Government indicating that this is the case.

49. It would clearly be most desirable if the Hume Circle Precinct were developed in conjunction with, and coordinated with, the development of Causeway, the railway yards and Eastlake by the ACT. The GNCA is of the view that this would all proceed more smoothly if all these areas were under the control of the one jurisdiction. As has been pointed out elsewhere in this submission, the Hume Circle Precinct proposal, even if it eventually only involves a

couple of thousand residents, will need significant physical and social infrastructure. Unfortunately, there are no free lunches, there is always a quid pro quo with any perceived gain, and the ACT is going to have to pay something for all this densification. Consequently it would be desirable for the ACT to have control over what is built, when and where.

Does the NCA have to capability to plan the precinct?

50. Does the NCA have the resources, staff and experience to appropriately plan a 20ha precinct? Given its small current staffing numbers this seems implausible. Would the Commonwealth be prepared to significantly expand funding of the NCA to enable it to recruit and retain suitable numbers of qualified staff? Given the Commonwealth's apparent reluctance to spend additional funds in the ACT this seems unlikely.
51. The lack of any supportive detail in the NCA's Amendment 102 document is concerning. Reservations about the NCA's possible lack of competence in planning for a proposal of this magnitude might be allayed if the NCA could produce a disinterested and independent assessment that the Hume Circle precinct was a more suitable location for a significant number of 12 to 15 storey tower developments than other alternative sites around Canberra. Absent of this, some might feel the NCA has adopted this idea merely because it is adjacent to a Designated Area approach route under the NCA's control.
52. The absence of any estimates of the likely eventual population of the developed precinct, or of associated traffic flows during its construction and following completion of the development, suggests that the NCA has given the proposal little thought. This is reinforced by an apparent absence of consideration of how to encourage the supportive retail, commercial, and entertainment facilities which will be required within easy walking distance of the precinct⁸, or about the adequacy (or not) of existing utility and social infrastructure.
53. In summary the GNCA is of the view that the NCA does not fully understand the magnitude of the task it proposes to embark upon, does not have the necessary skilled staff it would need to undertake its expanded role, and is unlikely to be granted the funds to make good these shortfalls.

⁸ Narrabundah shops at 1.35km as the crow flies would be closest retail, but this is considerably further on foot and involves crossing busy Canberra Ave.