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Draft ACT Planning Strategy Submissions  
Environment and Sustainable Development  
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Dear ESD

## GNCA COMMENTS ON THE DRAFT ACT PLANNING STRATEGY

### Summary

The document fails to establish a case for the strategy proposed. There is no compelling evidence that Canberra's projected population growth and future needs cannot be met under the current planning regime. If the Government believes that change is necessary the document needs to be completely recast to demonstrate that:

- a. there is a real problem; and
- b. the solutions proposed are the most appropriate and effective.

The premise throughout the whole document is that the planning strategy being proposed is essential to cater for the projected increase in population. The solution is to increase intensification throughout most of Canberra. This will lead to a predominantly apartment city where landscaping is replaced by concrete and paving.

Even if the projected population increase of approximately 84,000 by 2030 were to be realized, there is no evidence that it could not be accommodated by using the current Spatial Plan and zoning.

**R1 The proposed Planning Strategy be rigorously reviewed and redeveloped to include principles, strategies and targets that are based on verifiable analysis, realistic projections and reasonable and explicit assumptions.**

The present draft document contains several ambiguities, apparent contradictions and vague statements to be of practical use in planning for the future of Canberra.

For example; under Principle 7 (p. 67) it is stated:

*"Canberra was conceived as a capital that would epitomize the ideals of an emerging democratic nation in its layout, parks and buildings. Walter Burley Griffin's concept of relating the city structure to its landscape setting has been modified but never lost."*

However, the details in the document reveal a plan to intensify the building stock, and encourage the construction of more and more apartments over more and more of the city. The Garden City concept has all but disappeared and Heritage is only briefly mentioned.

**R2 Garden City concept and Heritage values must be core elements of the planning strategy.**

The distinct characteristics and functions of local and group centres should be maintained. The document pays lip service to the desirability of diversity. The proposed solutions reflect an unsatisfactory one size fits all approach.

**R3 The desirability of maintaining diversity between group and local centres, and between local centres, needs to be fully recognized in the Strategy.**

There is no recognition of the widespread concern in the community about the poor quality of construction and the failure to enforce the requirements of the Territory Plan (*e.g.* plot ratio).

**R4 The quality of construction and compliance with Territory Plan must be addressed in the planning strategy.**

The GNCA contends that the current planning system (and the Planning Legislation and associated arrangements) needs a major overhaul to more appropriately balance the needs of the community against to ambitions of developers.

ACTPLA needs to be reinvigorated and its capacities strengthened so it can assess the quality and compliance of all proposals from developers.

**R5 ACTPLA needs to be reinvigorated and its capacities strengthened so that it can properly assess the compliance of all proposals from developers.**

We contend that intensification along all the proposed transit ways is a poor target. The rapid flow of traffic along the major routes between centres is one of the features that makes Canberra's dispersed layout workable. As a result, travel times in Canberra are much less than in most other capital cities and the ACT has a clear advantage with this situation. It seems most unlikely that reducing these thoroughfares to some imitation of the Parramatta Road in Sydney will bring advantage to anyone. Traffic will move slower, and the residents will be subjected to an undesirable amount of vehicle pollution, from both exhaust fumes and noise. We are also puzzled as to how these roads are going to be both major transit ways and areas that people would enjoy for outdoor dining and strolling.

**R6 Further intensification along transitways should only be permitted in areas already designated in the existing plan.**

We are opposed to raising height limits in local centres, at least in our area. We find this totally unacceptable and unnecessary. The Griffith local centre is a thriving centre with a variety of small shops, restaurants and other businesses. It draws people not only from the suburb but also from other parts of Canberra because of what is offered. It may well be appropriate in some other parts of Canberra but in areas like Griffith, Yarralumla, Ainslie and

most other parts of inner Canberra, the local centres are generally satisfactory as they are. Their village character makes them accessible. People value the neighbourhood feel and the ease of parking is an attractive feature for many. For those who want larger supermarkets, Manuka and Kingston in the South and Dickson in the North provide an easy alternative. **The GNCA would be strongly opposed to any relaxation of building height restrictions applicable to the Griffith local centre.**

## **General Comments**

Many of us consider that Canberra is an eminently liveable city; one that is special with its own unique character, which we think is worth maintaining for the future. Indeed, its liveability (including the ease of getting around) is one of the main reasons we are here. While certainly there are aspects that can be improved, and we need to plan in a way that can accommodate future population growth, we should aim to build on and enhance what we already have.

Given the importance of the draft document to Canberra's future it is crucial that the right strategies are developed and implemented. While the document may capture some of the input that was made during Time to Talk, in particular the six key messages (p11), these key issues have not been applied in the planning document.

Furthermore it provides no justification to depart from the principal objectives of the current Spatial Plan. We contend that analysis of the available data indicates that Canberra should be able to cope with the projected population increase without any change to the existing planning rules or the Spatial Plan for at least 20 years.

The Australian Bureau of Statistics (Series B 3222.0) forecasts a population increase for the ACT from 360,404 in 2012 to 431,043 in 2030 – an increase of approximately 71, 000. In a report released by the Chief Minister's Department in February 2011 the population of the ACT is forecast to increase from 369,090 in 2012 to 453,343 in 2030, an increase of approximately 84,000 over the 18 year period. There should be an explanation in the Strategy to explain the difference between the two sets of numbers.

New areas like Molonglo will be coming on stream in the next few years; many areas currently zoned as RZ2 have not been developed; and there large areas already available for higher density development around Civic, the Town Centres and in areas such as Kingston Foreshores and Eastlake. The draft document is lacking in any analysis to demonstrate that intensification to the level advocated in the Strategy is required to meet any plausible projected need.

Under the guise of preparing Canberra for the projected growth in population to 2030 and beyond, it is proposed to completely overhaul existing planning rules and introduce a number of special concessions to further assist developers. The need for these changes is not

demonstrated, nor why assistance for developers is the most effective, efficient and equitable solution to the expected challenges.

We are concerned that there is not one reference in the Strategy to the Garden City and are appalled that there is no reference to heritage areas.

**R2 Garden City concept and Heritage values must be core elements of the planning strategy.**

It now appears that everywhere within 10 to 15 minutes walk of a precinct or a transitway will now be ripe for multi-storey development. However, the Strategy needs to be clarified on this issue because “precinct” is not defined. If this plan were implemented it would indicate that the principles that have guided Canberra’s development for its first century are now to be abandoned. We suggest that if this were widely known in the community there would be general consternation. We simply do not believe that the majority of Canberrans now have a very different view on “the way we want to live” compared with seven years ago in 2004, as the draft Strategy seems to be suggesting (page 8 refers).

The tone of the document is enthusiastic about the benefits of urban intensification, but little consideration is given to possible disadvantages. Not only is there is no assessment of the need for the large quantities of high rise accommodation that are proposed, but also no thought as to what what proportion of our population will wish to live in “high rise” dwellings.

The GNCA is opposed to the proposed new developments along Canberra’s major transitways. The rapid flow of traffic along the major routes between centres is one of the features that makes Canberra’s dispersed layout workable.

The Strategy contains virtually nothing about improving the quality of building and the level of compliance. Compliance and quality are usually the main matters of concern within the community. These must be prominently addressed if the Plan is to be credible. Burying these issues in the body of the text is not good enough.

Quality development requires quality planning, design and construction, controlled by the community's government. The GNCA contends that the current planning system (and the Planning Legislation and associated arrangements) needs an overhaul to more appropriately balance the needs of the community against to ambitions of developers.

**R4 The quality of construction and compliance with Territory Plan must be addressed in the planning strategy.**

ACTPLA needs to be reinvigorated and its capacities strengthened so it can again assess the quality and compliance of proposals from developers. Too many non-compliant applications are being approved and the non-compliance is often only revealed through the cumbersome and expensive ACAT process. Incentives need to be developed to encourage developers to

try harder to ensure that their proposals comply with the planning rules. These changes may cost more, but the GNCA does not see why the beneficiaries of the system, the developers, should not be expected to bear the cost of adequate assessment and perhaps even some of the cost of the associated infrastructure.

**R5 ACTPLA needs to be reinvigorated and its capacities strengthened so that it can properly assess the compliance of all proposals from developers.**

The Strategy appears to have been written in a hurry because these are several errors and issues needing clarification. For example, the street scene on page 33 is a mirror image of the the real scene.

The table on page 23 appears to represent percentages, but is this correct? It would have been valuable to provide the actual numbers as well as the percentages. Percentages are not very useful unless the size of the population is known.

Another example relates to Strategy 2: Renewing group and local centres (p. 36-39). The text refers to both group and local centres, except in the box on page 36, where the 10 minute walk only appears to apply to group centres. Does the 10 minute walk apply to both centres or just to group centres? If it only applies to group centres, what is the walk-time for local centres? Clarification is needed.

As an example of a vague statement refer to Strategy 3, “Improving everyone’s mobility and creating more choices in travel by integrating investment in Canberra’s transport networks with the land uses it serves.” Everyone would agree with this statement, but it does not really help to improve mobility. How was the five year target determined? And how will we know that the target has been reached or not?

## **Comments on the Strategies**

The Planning Strategy lists nine strategies, each with a target. No details about how the targets were derived are given. There is no evidence that they are reasoned, achievable goals realistically reflecting what can be done in the five year timeframe specified in the table on page 68.

The detail of each strategy is buried in the associated commentary and the coloured break-out boxes. This makes it hard to get a grasp of the substance of the proposed changes.

The Key Target is that: ***“In the next 5 years, 50% of new housing be within the established urban area of Canberra”***.

This target is the same as in the Spatial Plan, but the Spatial Plan will be replaced. How was the 50% target obtained, why not 40% or 60%? What is meant by ‘*the established urban area*’ in this context? Why has it to be done in the next 5 years? Does this mean that 50% of new housing will be in Greenfield areas, and if so where? If much of the new developments are apartments this will have an adverse affect on the ACT’s greenhouse emission goals.

The key over-arching target appears to be an *ad-hoc* statement with no supporting evidence – this is unsatisfactory.

What the current Spatial Plan says is “*At least 50 per cent of all residential development will occur within 7.5kilometres of the city centre (the Residential Intensification Line) in the next 15 years. Higher density residential development will be located in and around Civic and the town centres, on major centrally located urban renewal sites and along major transport corridors.*” and “*Primarily this increased population will occur within Central Canberra in Civic, along Northbourne Avenue, Constitution Avenue, in Barton, Kingston and around the town centres with limited change to existing suburban areas.*” This is considerably more prescriptive than the current document. Were the Planning Strategy to adopt the language of the Spatial Plan many of our concerns would abate.

**Strategy 1 - Creating opportunities for increased density and dispersed employment by capitalising on the existing structure of the centres and inter-town transport connections.**

*Target: 75% of residential urban intensification is to be in established town and group centres and along transit ways.*

**GNCA does not support this strategy.** We contend that intensification along transitways is a poor target. As stated above, the rapid flow of traffic along the major routes between centres is one of the features that makes Canberra’s dispersed layout workable. It seems most unlikely that reducing these thoroughfares to some imitation of the Parramatta Road in Sydney would provide advantage to anyone. Traffic will flow slower, and the residents will be subjected to an undesirable amount of vehicle pollution from both exhaust fumes and noise. We are also puzzled as to how these roads are going to be both major transitways and areas that people would enjoy for outdoor dining and strolling.

The maps and wording suggest that intensification will occur along all transitways and extend back for some distance – not specified specifically but probably up to several hundred metres. This is a dramatic change from current policies. We believe that it is possible, for the foreseeable future, to achieve greater densification and satisfactorily accommodate increases in Canberra’s population without significantly changing current zonings. Some of the transitways are already slated for medium to high density development, as are some new areas *e.g.* Eastlake. There is scope for considerable additions in apartment blocks close to the Town Centres and that is appropriate. Molonglo will provide accommodation for very large numbers of people. Greater densification along Northbourne Avenue and developments at Kingston and Eastlake will allow soundly based assessments to be made in the future about the effectiveness of rapid service public transport along major routes and how well they are likely to be utilized. We should await the results on this before embarking on more extensive changes to the current strategy and residential zonings.

**R6 Further intensification along transitways should only be permitted in areas already designated in the existing plan.**

Will 25% of “residential urban intensification” be in low density residential areas protected from densification under the Spatial Plan? This is unacceptable and unnecessary.

The strategy significantly reduces the status for Civic to just one of several town centres (p32), as “*City will remain the ‘first among equals’ of the town centres as the place for the Territory’s prime administrative and cultural institutions.*” This reverses the policy of establishing the dominance of Civic over the town centres as the centre of Canberra.

The strategy envisages “*increased density in the town centres and along the transitways. Employment opportunities will be dispersed and more people can live closer to work.*”

This would permit high density housing development almost anywhere in the city, which is in conflict with the Spatial Plan. We would prefer any further intensification to be focused on the areas around Civic, Belconnen, Gungahlin, Woden and Tuggeranong.

The discussion suggests that “*Implementing this strategy will require ... a comprehensive planning and development framework for City. To encourage more residential development and improve City’s vibrancy there is a need to review the planning controls. Reconsidering parking requirements, building heights and introducing incentives for the re-use of the older building stock must be a priority.*” The GNCA does not accept that there needs to be further relaxation of planning controls to encourage developers.

The strategy proposes that “*As we reduce our reliance on the car, Canberra’s avenues can be progressively transformed into beautiful streets that allow people to enjoy shops, outdoor dining, strolling or cycling.*” This comment appears to confuse a falling proportion of travel by car with an absolute decline in car travel. The latter appears unlikely to happen.

The strategy proposes that “*As people rely less on the second car, or even the first, the parking generation rate used to assess the parking requirements in developments can be lowered.*”

GNCA considers it likely that most people will continue to want to own and use cars for various purposes and that parking requirements will continue to be needed at something like the present rate, especially for residential developments. Any reduction in parking requirements associated with residential developments should be deferred until a functional, reliable and cost effective high speed public transport system has been established and its impact on future parking requirements can be properly assessed. If car parking capacities are reduced prematurely, the most likely scenario is that even more parking will take place on the streets and on the nature strips.”

## **Strategy 2: Providing new opportunities for lifestyle choices by renewing group and local centres as the hub of community life.**

**Target:** *10% increase in number of jobs in businesses or community facilities in group centres in every town (district).*

**We are strongly opposed to the proposal that urban intensification extend to areas within 10 minutes walk of group and local centres.**

The text in the Strategy is not clear whether the 10 minute walk refers to group and local centres or just group centres. If it applies to both it would cover a very large part of the Inner South and Inner North and effectively wipe out the original garden suburbs.

It would conflict with the Spatial Plan's intention to concentrate employment opportunities at the "*major employment centres (Civic, the town centres and Barton)*", which was in part supposed to make for a more viable public transport system. Dispersing employment will make this goal more difficult to achieve.

In our own area it would mean that virtually all of Griffith (including heritage areas) and most of Narrabundah, Forrest and Red Hill would be rezoned for urban intensification. Barton, Yarralumla and Deakin would be similarly affected (see the map below).

We acknowledge that it might be appropriate to raise height limits for some group centres enabling more businesses and service to locate there. Due regard would need to be given however to heritage aspects at Manuka.

**The GNCA would be strongly opposed to any relaxation of building height restrictions applicable to the Griffith Local Centre.**



*Approximate extent of areas in the Inner South identified for intensification (within 10 minutes walking distance from local centres and transitways) shaded red.*

We are very much opposed to raising height limits in local centres, at least in our area. The Griffith Local Centre is thriving centre with a variety of small shops, restaurants and other businesses. It draws people not only from the suburb but also from other parts of Canberra because of what is offered. For many, part of the appeal lies in its relation to its surroundings, its “village” feel and relative ease of parking. This would be lost if it were transformed into a larger centre. We know also that it would not be welcomed by many of the people who live nearby because increased noise and traffic which would have a severe impact on residential amenity.

**R3 The desirability of maintaining diversity between group and local centres, and between local centres, needs to be fully recognized in the Strategy.**

We expect that similar views about their local centre would be held by many residents’ groups in inner south and inner north Canberra. We acknowledge that some local centres in some parts of Canberra may need revitalization, but it is important that revitalization efforts be focused on those localities that need them.

For similar reasons, we have reservations about broadening the types of commercial uses permissible in local centres – because of the potential negative impact on the quality and character of the local centre and adverse impacts on residential amenity in nearby areas.

We support the proposed development of Master Plans for particular areas, but subject to the very important proviso that they are prepared in close consultation with the local community. They should reflect the particular characteristics and requirements of that community and have proper regard for the views of those who live and work in the area. We are strongly opposed to the notion that “one size fits all” or that there is a planner’s model that is to be imposed regardless of what the locals think. Experience to date fails to give us confidence in the Master Plan process.

Why is the target set at 10%? And with regard to the target of increasing the number of jobs in businesses or community facilities in group centres by 10%, it would be useful to know what the baseline is. How many jobs are there already in group centres and what are the implications of this 10% increase on the actual number of people employed?

**Strategy 3: Improving everyone’s mobility and creating more choices in travel by integrating investment in Canberra’s transport networks with the land uses it serves.**

*Target: 10% increase in people living and working in the same town (district) across Canberra*

**GNCA supports a strategy of improved public transport and personal mobility in principle,** but has concerns about the details of what is proposed.

How was the 10% target determined and how would it be monitored? What proportion of the population would have to move to meet the target, and what would be the costs of these moves?

In advance of improvements in public transport, it would be premature to reduce the amount of investment that developers are required to make to provide for car parking on the premises.

It needs to be remembered that Canberra does not have the same traffic congestion problems as are experienced in much larger cities such as Sydney and Melbourne, that travel by motor car is the only practicable option for many people in Canberra for a variety of reasons, and that ease of getting about by car is one of Canberra's principal attractions for many of its residents.

The target of increasing the percentage of people living and working in the same town/district across Canberra by 10% may be difficult to achieve without a commitment from the largest ACT employers, such as the Commonwealth and ACT Governments, to relocate their Departments. For example, as indicated in the Strategy document on page 24, only 3.4% of employment is in the fast-growing suburbs of Gungahlin, and only 8.5 percent is in Tuggeranong. What strategy is being planned to increase employment in such areas of Canberra?

We also noted that further work needs to be done on better defining Action's intended role. In particular, is it primarily one of ensuring that the more socio-economically disadvantaged sections of the community have a more effective means of transport or is it primarily one of providing a fast, efficient, affordable and frequent transport option for high demand users of transport living in higher density areas close to major routes and so encouraging a significant move from car to public transport use? We have doubts whether both objectives can be achieved at once.

We are totally opposed to automatic "discounting" of parking requirements simply on the basis of providing cycling facilities in new developments or proximity to public transport or similar reasons. Inadequate provision of parking facilities, especially in medium to high density residential developments, causes many problems including congested roads, degradation of public land, loss of trees and safety issues (through parking on verges). These are not problems that Canberra as a planned city needs to have. There are many reasons why most people will need or want to retain a car for use, even though usage of cars may well be less than in the past. It is essential that there be recognition of this.

There appears to be no transitway to the airport. It is as if the airport has been ignored! While developments at the airport itself are outside the reach of Canberra's planning controls, the consequences of these developments need to be recognized and planned for.

**Strategy 4: Providing more affordable and sustainable living options by promoting more choice in housing location and types.**

*Target: 25% increase in number and percentage of dwellings that are not detached houses in each district (town).*

The goal of providing more affordable housing is admirable but a strategy, which proposes the target as a mechanism to lower the price of housing is not supported. Given that there is a considerable overlap in price between town houses and apartments on the one hand and detached housing on the other, it is not clear how increased multi unit housing would make housing more affordable.

There seems little need to change the current system, the 25% target is unnecessary. Further incentives to developers also proposed under this strategy are also unnecessary, as are suggestions that subsidies might be provided to middle class empty nesters to encourage them to move on.

More clarification is needed on the proposal that developers be given scope to be more innovative by “*improving the potential returns through increasing the gross floor area on more profitable land uses.*” How would the Government ensure that such incentives do not result in developments that are out of scale and out of character with the surrounding area? How would this align with efforts to reduce greenhouse gas emissions which the report already states is more achievable through townhouse and villa development than by high, medium and low rise residential buildings (page 26)? How would this also align with transforming Canberra’s avenues into “beautiful streets that allow people to enjoy shops, outdoor dining, strolling or cycling” (page 32)?

We are opposed to relaxing requirements for developers relating to overheads, alluded to in this part of the strategy, as a means of achieving more affordable housing. This is presumably a reference to cutting requirements for basement parking, building standards generally, green space and garden/recreational areas, as well as reducing plot ratio requirements. This could also be construed as a subsidy to developers. It would be a poor outcome by any measure.

**Strategy 5: Building the capacity for everyone to participate in community life by improving the quality of the public realm, access to services and information**

*Target: Canberra ranks in Mercer index top 20 of global cities for most ‘liveable’, and ranks 1st in Mercer index in Australia for ‘eco’ cities.*

**GNCA supports strategies** to improve the quality of the public realm and the general approach that is suggested.

Quite why Canberra should be obsessed with its Mercer ranking is not clear. In more general terms we all want to live in a city where everyone can participate in community life, and as such much of this strategy is just a recitation of motherhood statements.

The GNCA believes that the authors of the Planning Strategy might usefully give some thought as to what extent a more livable city involves more from Governments than reviewing planning rules to provide additional incentives to developers.

**Strategy 6 Improving resilience by investing in efficiency and improvements to the development and management of the physical infrastructure.**

*Target: 5% efficiency increase in ACT annual expenditure on physical infrastructure across Canberra.*

**GNCA cannot support this strategy without considerable clarification.** It appears from the Strategy that the mooted 5% efficiency increase is merely a barely disguised 5% cut in infrastructure maintenance expenditure similar to the Commonwealth Public Service “efficiency dividend”. We would strongly oppose such a move, and urge that the Government spend what must be spent to maintain our existing infrastructure legacy in an optimal condition. Failure to conduct due maintenance may be attractive to Governments as it leads to short term savings, but to under maintain ones infrastructure by 5% per annum soon leads to rapidly deteriorating assets, which need to be replaced before the end of their economic life (which in some cases can be many decades if not a hundred years).

It is not clear what is meant by “resilience” in this strategy. The GNCA would of course support investing in efficiency and improvements in the way we develop and manage our infrastructure, including through the adoption of innovative approaches, where this was not merely a cover for funding cuts. However, it is not clear how any real increase in the efficiency of expenditure on infrastructure is to be measured.

We also note the importance of ensuring that policies are properly thought through and are cost effective. This principle should extend to any decisions taken on developing ‘green power’. It should not automatically be assumed (as the paper appears to do) that the development of localised alternative green power is warranted. Similar considerations apply to schemes to encourage the capture of rainwater by individual property owners. Careful analysis of the costs and benefits needs to be taken before diverting resources or providing incentives for such approaches.

**Strategy 7 Managing growth responsibly and sustainably by taking a regional approach to urban settlement**

*Target: Achieve a regional settlement strategy*

**GNCA supports this strategy in principle** but, the target needs to be clarified. We need to know what sort of regional settlement strategy is going to be achieved. The approaches suggested in the paper, including the desirability of working with regional neighbours, appear sensible.

We also note that sustainable growth is a physical impossibility.

More work needs to be done on this strategy and the target needs more focus.

### **Strategy 8 Valuing the land by using it efficiently, protecting and enhancing areas of good biodiversity and agricultural production**

**Target:** Achieve a regional biodiversity plan

**GNCA supports the general approaches outlined for this strategy.** We strongly support the proposals to maintain connectivity of green biodiversity corridors throughout the whole of the ACT, including urban areas.

The concern for areas of good agricultural production appears misplaced. The Canberra region has traditionally supported little agriculture and was predominantly used for sheep grazing. Consequently converting to urban use the relatively low value primary production areas that are typical of the country surrounding Canberra is generally a more efficient and better use of the land.

### **Strategy 9 Creating a more prosperous region by focusing on the strengths of a clean, knowledge based economy**

**Target:** *10% increase growth in the share of jobs in the knowledge sector compared to other cities and regions."*

**GNCA supports this strategy in principle.** However, more clarity is required on how this is intended to be implemented. We have reservations about the provision of incentives for enterprises that contribute to the 'clean economy'. What sort of incentives and at what cost to other industries and the consumer? Why are they necessary?

Any provision of incentives (*i.e.* subsidies or some other form of protection) can only be justified if it provides an overall benefit to the economy which outweighs the costs involved. The failure throughout this document to apply any analytical rigour to what is being proposed is profoundly disturbing.

How does this strategy link in with Strategy 7? Should these be amalgamated?

## **Delivering the Plan – Principles to Guide Decisions**

### **Principle 1 – Create a diverse urban environment**

We support the principle of promoting diversity, but the Draft Planning Strategy, by promoting intensification will result an apartment city where landscaping is replaced by concrete and paving. The principle is fine but the implementation is not. Any supportable strategy would need to explicitly acknowledge the need for diversity between group centres and local centres.

**Principle 2 – Provide for accessible and pleasant places to live, work and play**

We support this principle but its application should allow for local differences. We do not support a blanket approach to the development of group and local centres. We are opposed to the notion that mixed use development is a desirable approach for all local centres and that all such centres should be substantially larger than they are at present. (see comments above about diversity)

We note that at present the government is not “investing in the quality of our public places, improving their amenity and supporting good social interaction and cultural expression.” The application is not consistent with the principle.

**Principle 3 – Design for community resilience and the lowering of natural resource consumption**

We support this general principle. We note the comments about the value of street trees particularly shady trees in ameliorating harsh climatic conditions. This principle is also relevant to the desirability of retaining open space areas within Canberra and encouraging the retention of trees and gardens on suburban blocks. Planning requirements including plot ratio requirements (and the way they are defined) should have greater regard for this.

**Principle 4 – Provide choice in safe convenient modes of travel**

We support this general principle but the actions described to apply the principle are too vague. For example it’s easy to say “invest in public transport to make it more attractive and cost effective” but where are the dollars and what do we spend them on? We are opposed to increasing residential densities along major commuter routes; this will simply clog-up transit routes. We recommend that greater regard needs to be given to ensuring pedestrian safety including in relation to cyclists. Mixed walk and cycle ways are usually not a good idea.

**Principle 5 – Promote connections, continuity and resilience in the natural systems**

We support the principle but note that the government does not always follow the prescribed applications. For example if the Brumbies development goes ahead the spatial integrity of the green corridor from Mugga Way to Manuka will be destroyed.

**Principle 6 – Value land for its best, most sustainable use for now and the future**

In general we support this principle but the words “for now and the future” are redundant and should be deleted. Furthermore, do we really want to boost food production in the ACT? Generally we have poor quality soils so why should put food production in the ACT as a high priority?

**Principle 7 Enhance the capital in the bush**

We support the general approach but are strongly of the view that much more emphasis needs to be given to retaining the garden city character of the capital that has had such a great role in creating Canberra as a city that is both beautiful and liveable.