

Committee Secretary
Joint Standing Committee on the National Capital and External Territories
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Dear Secretary and Committee Members

INQUIRY INTO THE NATIONAL CAPITAL PLAN (NCP) AMENDMENT NO. 102 - HUME CIRCLE PRECINCT

1. The Griffith Narrabundah Community Association (GNCA) thanks the Committee for the opportunity to comment on this matter.
2. The National Capital Authority's (NCA's) website reminds us that
“the purpose of the National Capital Plan is to ensure that the Commonwealth's national capital interests in the Territory are fully protected, without otherwise involving the Commonwealth in matters that should be the prerogative of the Canberra community.”
This should be borne in mind in all consideration of the NCA and Amendment 102 to the National Capital Plan.

Recommendations

3. The GNCA recommends that the Committee:
 1. advise the Senate to disallow NCP Amendment 102;
 2. if disallowance is not an option, that Amendment 102 be amended to exclude Griffith Section 25 (the apartments behind the Ramada Diplomat Hotel), Griffith Section 29 (St Clare's College), and Griffith Section 84 (Staffordshire Terrace (Tce) and adjoining apartment complexes);
 3. seek appropriate legal advice on whether Amendment 102 goes beyond the powers bestowed upon the NCA by the Australian Capital Territory (Planning and Land Management) Act 1988 (PaLM Act);
 4. seek advice from the Auditor General about whether the NCA has complied with Commonwealth Guidelines about the treatment of unsolicited proposals, conflict of interest, and probity issues.

Origins of the proposal

4. The GNCA understands that the Jega Consortium owns the leases for 12 and 16 Mildura St.

5. This was presumably related to an item on p.4 of the Authority Board Meeting A2023/5 19 October 2023. Public Record "*The Authority also discussed....A potential proposal to improve urban design outcomes around Hume Circle and Canberra Avenue*". The Jega Consortium is first mentioned explicitly in the Authority Board Meeting 2024/6 of 11 December 2024 recorded that
 "JEGA CONSORTIUM – The Chair welcomed the Consortium to the meeting and the Authority noted and considered the Consortium's presentations and the intention of the proposed development at Hume Circle. The Authority considered and discussed design elements and noted that the proposed development would occur in stages with completion over a long-term period."
6. The record for Board Meeting 2025/1 of 12 February 2025 indicates that Jega Consortium had been advised of the proposed draft Precinct Code for Hume Circle, and that for meeting 2025/3 of 8 April 2025 that Jega has proposed "*an early draft of the proposed Urban Design Framework*". This suggests that the Jega Consortium was an active player in the development of the precinct.
7. These developments, from about three years ago onward, suggest that NCA interest in the redevelopment of Fyshwick is not new, and appears to have been sparked by an approach from Jega. The complete silence about the long tail of the proposal when it was publicly announced via Draft Amendment 102 would appear to be at best disingenuous. Perhaps in recognition of the bad optics of the failure to reveal the long involvement of Jega, the NCA's Consultation Report on Amendment 102 released on 27 May 2026, advises (p.4) that "*JEGA Consortium has been in discussions with the NCA (and ACT Government) since September 2023 on the potential for development in this area*".

Scene Setting

8. The area to be included in the Hume Place Precinct is only defined in an imprecise manner in the draft amendment document issued by the NCA (Draft Amendment 102 Hume Circle Precinct January 2026, referred to as the Draft Amendment). This lack of clarity is carried forward into the final Amendment as signed by Minister McBain (National Capital Plan Amendment (No. 102 – Hume Circle Precinct) Instrument 2026 27 July 2026, referred to as the Signed Amendment). Further details are available at **Appendix 1**.
9. The upshot is that the residents of the Axiom, an apartment block at 111 Canberra Avenue, do not know whether their building is or is not included in the precinct, as some of the documents and statements by the Chair are contradictory name Sections incorrectly.
10. It appears that concerns about whether one's apartment building is or is not included in the precinct is trivial compared with the big picture, but for the residents in these areas the status of their block has major implications, and they deserve the attention of the NCA's leaders. It is the GNCA's view that when dealing with people's homes and lives it is of the utmost importance that Government bodies be very precise in the scope and details of any changes that they propose, and refrain as far as possible from hand waving and invocations of modern interpretations of the vague dreams of figures from over a hundred years ago.

11. It is noticeable that nowhere in the Draft or Final Amendment does the NCA mention the actual area of the proposed Precinct, even approximately, nor the current population and number of dwellings in the Precinct, or the likely population and number of residences when redevelopment is complete. This important task has been left to others. Whether this is intentional, or merely an oversight (or a matter of indifference) by the NCA is not clear.
12. **Table 1: Blocks within the NCA Hume Circle Precinct** (attached), prepared by the GNCA using information from the Territory Planning Authority's online utility Actmapi, lists all the blocks within the proposed precinct boundaries. This indicates that the total area of the blocks within the Precinct is 204,684m² or 20.4 hectares. The actual area would be slightly larger if road reservations were also included. There are 22 blocks north of Wentworth and Canberra Avenues, with an area of 112,683m² or 11.3 ha, and only 11 blocks in the somewhat smaller southern sector with an area of 92,001m² or 9.2 ha.
13. Current land use in the Precinct is varied, with 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 zoned IZ2 (Industrial Mixed Use) except for blocks adjacent to Canberra Avenue near Hume Circle which are zoned CZ2 (Business). These blocks have either one or two storey industrial or commercial structures or are 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. It is generally accepted that this area should be redeveloped for mixed use housing, and the ACT has been developing plans for the adjacent East Lake, Causeway and former rail yards areas.
14. 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 Avenues (Griffith Section 84) are zoned CZ2 but have 2 and 3 storey apartments (Residential use is one of the permitted uses in the CZ2 zoning). The area between Sturt and Canberra Avenues is zoned CF (Community Facilities) and is occupied by St Clare's College. The blocks east of Leichhardt St and south of Wentworth Avenue are zoned CZ2 and consist of 4, 6 and 8 storey apartment buildings (Griffith Section 25), and the 2 storey Ramada Diplomat Hotel.
15. To date the NCA has provided no estimates of the likely number of dwellings and residents in the proposed precinct when fully developed, leaving this to others. A reasonable estimate of the number of apartments that could be built on the various parts of the precinct, taking into account the various building height limits, can be made by using the apartment per square metre yields of the apartment blocks in Section 25 Griffith. Using this approach the GNCA estimated that the redeveloped precinct could comprise perhaps 9,400 apartments. If we assume 2 residents per dwelling this amounts to a population of 18,800 to 19,000. And at an average of 1.5 vehicles per dwelling there would be a need to cope with another 14,000 cars.
16. These estimates are only order of magnitude and do not pretend to be precise, but they do suggest the number of apartments will be closer to 10,000 than 5,000, and the likely population closer to 20,000 than 10,000.

The GNCA would welcome any correction of these numbers from the NCA, provided their derivation was also explained. However, the GNCA fears that it is possible this is another 'planning' issue that the NCA only intends to address once the precinct is firmly locked into place.

17. The Territory Planning Authority (TPA) has proposed similar but slightly larger numbers, comprising 10,500 dwellings and 23,000 residents in its submission on the Draft Amendment (p.6) suggesting that the GNCA's estimates were a little conservative and on the low side. All things considered the two estimates are surprisingly close. We don't know the TPA's methodology but recognise that it will have a wealth of data on which to build its models.
18. These estimates relate to the various height limits proposed in the Draft Amendment, and so would need to be reduced to reflect the slightly lower limits proposed in the Signed Amendment., but they could be expected to be broadly similar. While some building heights have been reduced from 15 storeys to 12 storeys, it appears that there will still be some "landmark" 15 storey buildings. Also, the 15 storey height limit covered about 57% of the precinct excluding St Clares, so even if all these buildings were reduced to 12 storeys the maximum reduction in number of apartments would be 11%. Planning for 21,000 residents is essentially the same as planning for 23,000 residents.
19. To put these numbers in perspective the 2021 Census has the population of Inner South Canberra as 31,592, with 15,903 private dwellings (the number of publicly owned dwellings is apparently a state secret). The TPA estimate is very close to the entire 2021 population of 24,600 for Weston Creek. So development of the precinct would result for the inner south in a 73% increase in population and a 66% increase in the number of dwellings.
20. Clearly implementation of the Amendment would 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 large increase 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.
21. The Committee has listed four Terms of Reference and asked that submissions address at least one of these. We will address these in sequence.

Term of Reference 1: The National Capital Authority's approach to the Precinct under the Australian Capital Territory (Planning and Land Management) Act 1988 (PaLM Act)

22. The NCA bases its claim to have the power to extend its authority over portions of suburban Canberra on its unique and untested interpretation of the powers it has been granted under the PaLM Act. It is accepted that under its responsibility for the Main Avenues and Approaches, the NCA has responsibility for Canberra Avenue and the road reserve it runs on, although it is not clear why under this doctrine it was the ACT (rather than the NCA) which paid for the recent installation of pedestrian crossing lights outside St Edmunds College.

This power is generally taken to give the NCA authority of the setbacks of buildings from the main approaches, what can be planned on the setback, and also control over the façade of any building facing such an Avenue, including its height, architecture, and building material.

23. The NCA now proposes to extend its planning powers over Designated Areas through expanding its authority over the entirety of any block facing Canberra Avenue beyond the façade to the rear of the Avenue, and then by contagion, the block behind that rear boundary, and again to the block beyond that. This will apply on the north side of Canberra Avenue between Hume Circle and Dalby St, and on the south side between the eastern and western ends of McMillan Crescent. Many have difficulty comprehending how a rundown ex-industrial area, completely ignored by both the authors of the PaLM Act and the NCA until a year ago or so, can now be regarded as an area with “special characteristics of the National Capital”, as is required for an area to become a Designated Area. Similarly, what is “special” about Griffith Sections 25 and 84, which house apartment blocks very similar to other blocks in Griffith and in Kingston?
24. These doubts are well put in the Submission by Wayne Arthur (Submission 33, p.72 in the NCA’s compilation of submissions), and a copy is attached for ease of reference. The GNCA believes that Mr Arthur is correct in his assessment that the Amendment goes well beyond the powers granted in the PaLM Act.
25. It perhaps significant that when Ms Doran, the CEO of the NCA, was questioned in the Senate on 10 June 2026 she said that the NCA Board had not sought legal advice on whether an area to be included in the Precinct met the test of being of national significance. It seems strange, and perhaps remiss, that a government body would undertake a transformative initiative without first checking that it had the legal authority to do so.
26. The entire claim that the area comprising the Precinct has National Importance is based on the assertion that passing planning control for this area to the NCA would somehow be implementing Walter Griffin’s plan for the area. This is despite the fact that it is not actually proposed that McMillan Cr be converted into a circle, or even extended in any way. Similarly, despite the emphasis on the establishment of a continuation of Sturt Avenue across Hume Circle towards Mt Ainslie, all that we will get is a narrow, grassed, lane. All this is a flimsy foundation on which to base such a significant claim.
27. Any purported relationship between the NCA’s plans and Walter Griffin is debunked in Emeritus Professor Weirick’s submission (Submission 75 at pp.250-258 in the compiled submissions). Professor James Weirick does not agree with the NCA’s interpretation. In fact, he says
“The National Capital Authority does itself no favours in distorting the historical record with respect to the Griffin Plan, instead of complying with the spirit and letter of this ‘Matter of National Significance’ by grounding use of the Griffins’ names on sound historical research and deep understanding.”
A copy of Professor Weirick’s learned and very interesting submission is attached for ease of reference.

28. The NCA might dismiss such doubts about the relevance of the Griffin legacy, arguing that the NCA had considered arguments similar to those of Professor Weirick, and had decided that these were incorrect. This, however, would not be good enough. Professor Weirick is an acknowledged expert in this field, which is not the case, as far as the GNCA is aware, with any members of the NCA Board. If the NCA wishes to continue with this proposition the onus rests with the NCA to find an equally qualified expert who is prepared to argue for its case.
29. What are the implications for the ACT if the NCA does have the power to unilaterally take over planning control over areas not previously regarded as being of National Significance, on the argument that by doing so the NCA is somehow realising some aspect of the Griffin's plans? As the Griffins prepared sketch plans for much of inner Canberra, it appears that any area between Hume Circle and the intersection of Kent St and Adelaide Avenue in the south, and Wakefield Avenue to the east of Northbourne Avenue and up into Lyneham to the west of Northbourne in the north, might be at risk.
30. What would this mean for the ACT? Although the ACT loses planning control, and control over the timing and pace of development, it appears unlikely that the Commonwealth Government will be prepared to provide the funding required for the provision of the usual urban services to these areas. It is not clear whether the meagre revenue the ACT currently receives via the Lease Variation Charge, under which the lessee of a block whose value is upgraded by a variation of the lease, will continue to apply when the NCA overrides ACT zoning provisions with its own more generous building height restrictions.
31. The Committee could profitably also ask what other Commonwealth legislation, regulations and guidelines apply. The NCA is a Commonwealth body¹ and is subject to the Public Governance, Performance and Accountability Act 2013 (the PGPA Act). As a Commonwealth body it is subject to the Department of Finance's Guidelines² on how to deal with unsolicited proposals. At the very least the Committee needs to determine beyond any reasonable doubt that the Amendment 102 did not arise from an unsolicited approach from the Jega Consortium, or, if it did, that the appropriate procedures were followed completely.

Term of Reference 2: The process for public consultation undertaken by the NCA for Amendment No. 102.

32. In the Draft Amendment 102 document the NCA indicated (p.9) that
"The NCA seeks an open and transparent draft amendment process. Following public consultation on the draft amendment, the NCA will prepare a Consultation Report which will be published on the NCA website. This report will include a summary of each submission. The NCA intends to publish the name of each person making the submission but will not publish contact details".

¹ See list of PGPA entities at <https://www.finance.gov.au/sites/default/files/2026-06/1%20July%202026%20PGPA%20Flipchart.pdf>

² Available at <https://www.finance.gov.au/government/commonwealth-investment-framework/commonwealth-investments-toolkit/assessing-unsolicited-proposals-0>

33. How does the NCA measure up to this target? The consultation can only be described as inadequate at best.
34. As has been outlined above, it is now clear that the Jega Consortium had been in contact with the NCA for about 2½ years before the release of the draft Amendment and was intimately involved in the development of the Hume Circle proposal. Other stakeholders, such as other property owners in the proposed precinct, both major investors and homeowners, and the neighbouring communities which would be impacted by a development of this magnitude, were not extended the same courtesy.
35. It seems that after agreeing on the details of the precinct with the Jega Consortium, the NCA has been particularly reluctant to reduce either the physical scope of the precinct (by excluding everything south and east of Wentworth and Canberra Avenues, thus excluding residents in Sections 25 and 84 Griffith, as well as St Clare's College), or to reduce the proposed height limit to a level acceptable to residents at large. The reduction from 15 to 12 storeys in some areas is not significant given that most people want a limit of 8 storeys or less. And the suggestion of 15 storeys in the Draft Amendment might be perceived as merely an opening negotiating gambit.
36. This lengthy covert contact between Jega and the NCA seems inappropriate. The Committee might care to explore to what extent the NCA and its employees have complied with Commonwealth governance and integrity rules and guidelines about unsolicited proposals and tendering.
37. The initial consultation period ran from 5 January to 3 February 2025 (28 days) until this was extended, after a request by the ACT Chief Minister, to 17 February (a total of 42 days). The submissions were published on 16 March, with additional submissions published on 17 March. The Consultation Report was released on 27 May 2026, 99 days after submissions closed. The NCA gave itself more than twice as long to respond to the submissions than the time it had given the public to write them.
38. The timing of the public consultation over the summer holiday break, with the release early in January just after New Year, feeds into a feeling that the NCA had hoped to slip this through with minimal public notice. This was reinforced by the NCA's initial refusal to consider any extension of the consultation process even though, with an implementation time frame of several decades, it is clear that a week or two or even a month, was not going to impose any extra costs. And this view is reinforced by our knowledge now that the NCA had been working on this for at least 2½ years. The NCA and Jega have had plenty of time to think about it. Not so much the other stakeholders.
39. While the NCA did manage to publish most of the submissions – some 82 of the 93 listed on its website. The Consultation Report, published on 27 May, claims 94 submissions, while the latest list of submissions on the NCA website, dated 10 April, lists only 93. It seems unlikely we will ever learn how a submission overlooked for at least eight weeks was suddenly discovered and counted in the total of submissions but remained excluded from the published list, and unpublished as far as the GNCA is aware.

40. Despite its early enthusiasm for full publication of all submissions, with author's names being withheld only if requested, the NCA did an about face before publication and decided to release submissions only if explicit approval was given. The details of this reversal are given in **Appendix 2**. Perhaps this covert decision was taken when it was realised that the vast majority of submissions were against the proposal. If this was the motivation it was not very successful, with 82 respondents happy to have their submissions published.
41. The NCA appears to have abandoned fairly early on its intention of summarising the submissions. Possibly the number of submissions was much larger than anticipated, consistent with the view that the NCA had hoped to keep a low profile on this issue and avoid any unnecessary publicity. The unkind might say this reflects the NCA's lack of experience in planning consultations, and that it might have been better if they had first consulted with the TPA about the likely magnitude of the public response.
42. In the absence of any summaries of submissions prepared by the NCA, the GNCA has analysed the responses to the NCA's Hume Circle Precinct Proposal (Draft Amendment 102). The GNCA found that this analysis was impeded by the publication of the responses as a single undivided massive 350-page pdf document, which some older computers may have difficulty dealing with. It is unfortunate that the NCA chose this option, because it makes the submissions much less accessible. The GNCA notes that the TPA publishes submissions as individual documents.
43. The responses are listed in the attached **Table 2: Schedule of Hume Circle Submissions**. We read each submission and decided whether it was for (Pro), against (Con) or neutral, and classified them accordingly. Sometimes this was easy with submissions indicating directly whether they supported or opposed the amendment, but with others we had to read through to get a feel for the respondent's views. We apologise to any respondent who feels that we have misclassified their submission. The GNCA regrets that the NCA did not do this task for us, but we felt that it should be done.
44. As noted above the NCA reports receiving 94 submissions in its 'Consultation Report' of 27 May 2026 but only lists 93 on its website. Some 11 submissions were not published. The authorship of 23 published submissions has been withheld, presumably at the authors' request.
- 45. The proposed amendment was decidedly unpopular as 62 submissions opposed the proposal.**
46. Only nine (9) submissions unequivocally supported the amendment. These included the submissions from Fyshwick Business Association, ALDI Stores, Roundhouse Hotels, Stewart Architecture, and the Property Council of Australia. The Stewart Architecture submission supported the Roundhouse Hotels submission which sought extension of the 15-storey height limit to the Ramada Diplomat Hotel site. Another supporter seemed very keen for the precinct to be expanded to include 46 McMillan Crescent Narrabundah, and mentioned this

address three times on the one page, leading the reader to wonder if the respondent had an interest in this property.

47. Support from these parties is unsurprising as they expect some benefit from the change, and their obvious self-interest must be considered when assessing the weight to be attached to their support.
48. Greater Canberra, a lobbying group ostensibly established to encourage the construction of more affordable housing in inner Canberra, saw the amendment as an opportunity to provide “the delivery of affordable, social, public, and build-to-rent housing” while remaining silent on how this might actually be achieved. Perhaps more interestingly, two (2) apparently disinterested private citizens also supported the proposal.
49. Six (6) submissions were neutral, not expressing either support or opposition. These sometimes-raised other issues if the proposal were to be implemented, such as the Catholic Education Office seeking an assurance that St Clare’s would retain the exemption from planning controls that it currently enjoys under ACT planning rules.
50. Five (5) submissions expressed mixed support, along the lines of “We support the proposal, but note the need for further work on”. The TPA submission is a good example of this, supporting the proposal but then taking 13 pages to point out omissions in the NCA’s proposal, and then helpfully attaching a submission from the Suburban Land Agency (SLA) which took 9 pages to explain all the further work the SLA deemed was needed.
51. While we have no information on the 11 unpublished submissions, it seems unlikely that these would all have been in favour of the proposal. Even if this were the case, we would have a total of 20 in favour against 62 objecting, a ratio of 1 to 3. Much more probable would be these 11 responses reflecting, even if imperfectly, the distribution of the known responses, with 8 opposing, and 1 each supporting, neutral or offering mixed support. Statistically, even two (2) additional supporters from amongst these 11 submissions would be a big stretch.
52. Some submissions indicated, explicitly or implicitly, where the author lived. Thirteen (13) submitters live in Staffordshire Tce, and 6 live in Section 25 Griffith, (comprising the Axiom and other apartment buildings behind the Ramada Diplomat Hotel). Two (2) live “within the precinct”, so either in Section 25 or Section 84 in Griffith. Outside the precinct eight (8) live in Section 3 Narrabundah (comprising Bega Pl and the south side of McMillan Crescent), and 4 live elsewhere in Narrabundah.
53. A number of submitters appeared to have a detailed familiarity with Staffordshire Tce but did not claim to live there. Maybe they have friends there, or perhaps they thought their address was irrelevant to their submission. This latter sentiment may be shared with many of the other respondents who give no clue as to where they live.

54. In general, most of those who opposed the proposal agreed or acknowledged that there was a need to develop multistorey housing in the industrial/commercial areas north of Wentworth and Canberra Avenues but seemed much happier with 6 to 8 stories rather than the excessively high 15 storeys proposed. And there seemed to be no understanding of why the precinct 'needed' to extend south of Wentworth and Canberra Avenues.
55. Because the NCA does not appears to have done any extensive analysis of the responses its Consultation Report is of limited use. While the NCA has made some changes in response to the consultation these are minor in nature and do little to assuage people's legitimate concerns. The cynical might even suspect that the response was written before consultations had taken place.
56. The NCA does recognise that there is a lack of understanding about why Griffith sections 25 (behind the Ramada Diplomat Hotel) and 84 (Staffordshire Terrace and adjoining apartment blocks) have been included. Apparently to the NCA, circularity is essential to the precinct, although this consideration doesn't seem to be as strong in the rectangular extension to Dalby St between Canberra Avenue and Mildura St. And, if we are to believe the NCA, it is intended that nothing is to change in sections 25 and 84, which of course raises the question of why include them?
57. Similarly, there is a tepid acceptance that 15 storey towers are too high, so these are to be reduced to 12 storeys, except "*with flexibility for select height up to 15 storeys for landmark sites/buildings*". Many expect this will induce an outbreak of "landmark" buildings. There does not appear to be any objective definitions as to what comprises a landmark building so it seems that this will depend on the quality of the public relations firm employed by each developer.
58. An appropriate response would be to restrict the precinct to those blocks north and east of Wentworth and Canberra Avenues, removing with one simple change the unnecessary anxiety induced by living in an area zoned for redevelopment has imposed on the residents of Sections 25 and 84 Griffith. And in addition, reduce the maximum height to be permitted to 6 to 8 storeys, removing the threat of looming towers overshadowing the surrounds, while the immense population of residents overcrowds local shopping, entertainment, and educational facilities.
59. Generalised public concern about the precinct flows from the understanding that it doesn't really matter what the rules are now, when they can be altered at the stroke of a pen by whoever is later in charge of the NCA. Whatever the flaws with the ACT planning system, its rules are subordinate legislation, depending on provisions legislated by the Legislative Assembly, and if the planners act too outrageously there are political sanctions. By contrast the NCA answers to the Federal Parliament, where a micrometre would be needed to measure the magnitude of most member's concerns about Canberra and its residents.
60. In summary the NCA failed to achieve the open consultations that it committed to at the beginning of the process and has misrepresented and ignored the public's clear preference that the amendment should be either abandoned or modified both in scope and in scale.

Furthermore, the inconvenient timing of the consultation and the stubborn refusal to consider any extension, until virtually ordered to do so by the Territory Government, has left a lingering feeling that the NCA's desire was really to avoid consultation as much as possible.

Term of Reference 3: The different stages of high-level strategic planning under the NCP (National Capital Plan) through to development proposal assessment (known as Works Approval) and whether any improvements can be made to this process for the Precinct.

61. As far as the GNCA is aware the NCA has never handled a town planning project of this scale. Consequently, we can only speculate on how successfully the NCA will rise to this challenge. The GNCA is under the impression that the NCA greatly underestimates the problems and difficulties when planning for a new community of 20,000 people, but would welcome being pleasantly surprised. It seems most unlikely that the NCA would have the necessary staff with the appropriate skills, qualifications and experience already on its payroll (what would they have been doing?), but it seems unlikely that the Commonwealth will be willing to significantly expand the NCA's funding to pay for new staff in these new roles taking on tasks currently done by the Territory Government. Will the NCA poach staff from the TPA? Will it encourage planners from interstate?
62. Previous town planning efforts by NCA, for example the Manuka Circle Precinct Development Control Plan of 2017 do not inspire much confidence. This plan required that all building on Manuka Circle have their main entrance facing the Circle (a policy the GNCA believes is appropriate) but it is hard to miss that the new hotel being built on the former cinema site faces firmly away from Manuka Circle with its main entrance on Franklin St. If the NCA cannot ensure that its planning rules are applied by a small developer building a 5-storey hotel, how will it fare when facing off with large and well-resourced developers wanting to maximise the returns on their 12 storey (or in some cases 15 storey) residential towers?
63. The GNCA notes that the Consultation report advises (p.12) that a Governance Steering Committee comprising ACT Government and NCA representation will be established to oversee the Hume Circle Precinct proposal and facilitate integration and coordination of works. However, there is no mention of this in the Signed Amendment.
64. It is hard to see what the NCA will be able to contribute to future planning of the Hume Circle Precinct. It just means that the Territory employees working in the TPA will have to work to two masters when working on Hume Circle. This would be an additional burden with no upside at the best, and a strategy for paralysis at worst if the two parties disagree on an issue.
65. If common sense and a desire to optimise resource utilisation were guiding us the best solution is clearly to leave the entire area to be planned by the TPA, which would allow that body to seamlessly integrate the Precinct with the ACT's plans for Eastlake, the Railway Yards and the Causeway.

Term of Reference 4: The approach to long term planning for community infrastructure, open space, transport, and utilities to enable appropriate delivery of services and planning outcomes for the Precinct.

66. Earlier in this submission we quoted TPA estimates for the precinct of 10,500 dwellings and 23,000 residents, and noted that the changes offered in the Signed Amendment would have minimal impact, reducing apartment numbers and residents by at most 11%, or very roughly 9,500 dwellings and 21,000 residents. The Inner South had (in 2021) about 16,000 dwellings and 31,500 residents. Growth to 2026 is unlikely have changed these numbers to any great extent. So the problem presented by the Precinct is to somehow shoehorn an additional 5 to 7 suburbs into the inner south.
67. What would be the implications? The 21,000 residents can be expected to need parking for about 14,000 cars, and space on the roads to be able to move these around. While some might hope that car usage will drop significantly over the short to medium term, this is not going to happen. Apart from the slow pace of social change, which is usually measured in decades, Canberra's inherent layout makes it difficult to give up individual transport, as jobs and other activities are very widely dispersed on a scale that defies rational analysis. (What was the NCDC thinking?) A much more likely and quicker change will be the switch from internal combustion to electric vehicles, which will go some way to reduce airborne pollution, but will impose strains on the existing and projected electrical infrastructure to be able to charge all these cars overnight. With a precinct of mainly 8 to 15 storey buildings, and a low roof space per apartment ratio, solar panels on the roofs are not going to be of much assistance.
68. These cars, whether internal combustion or electric, are also going to need roads to get around. Canberra Avenue, and the Hume Circle roundabout are both clearly close to maximum capacity, and a significant increase in local population will mean that the intersection will need to be completely redesigned, and possibly grade separated (ouch! \$\$\$). At present all the retail, commercial, and entertainment facilities are south and west of Wenworth and Canberra Avenues, so some way to connect the expected larger population to the north and east will need to be devised. Suggesting that people should ride bikes or walk is not helpful, as the problem remains.
69. There will be a considerable need for parking spaces probably beneath these towers. Unfortunately, the Hume Circle precinct is very close to both wetlands and Lake Burley Griffin (no doubt one of the area's attractions), so the water table will be relatively close to the surface. This is not a problem with modern pumps, but there might be risks if climate change leads to aerial river type storms (as happened in Spain a year or so ago) which overwhelms local drainage systems, or blackouts which last for a considerable time (days rather than hours). We can leave it to insurance companies to quantify and charge for offsetting these risks.
70. More challenging might be to deliver power for all these people and cars. It can be done, but there will be a cost. Much of the existing residential network will also need to be renovated at the same time, as the typical house goes from single phase to three phase power.

All doable, but expensive. We can all reasonably hope for assistance from appropriate technical advances over coming decades, such as room temperature (ie above liquid nitrogen) superconductors, but sometimes it doesn't happen (the latter has proved harder to achieve than initially expected).

71. Potable water, sewerage, and storm water infrastructure will also need to be provided. Again, doable but expensive. The new residents will need to buy stuff. A ratio of one local centre for every 3,000 to 4,000 residents, as is typical of suburban Canberra, would suggest that we are looking at the equivalent of about 5 to 6 local centres. But perhaps the higher density will reduce this, and we will have fewer but larger stores. Maybe, but New York still has bodegas or corner stores. The inner south already has two Group Centre, Manuka and Kingston, so an increase in population of 20,000 or so suggests a new Group Centre would be warranted. The question is, where?
72. The proposed population suggests a need for about six new childcare centres, and preschools, if the population is typical. Let's be optimistic and halve that to three of each. Then there are primary schools. The inner south currently has 3½ of these (Narrabundah stops at year 2) so with a typical population we will need another two of these, and another secondary school. And there will also be a need for another secondary college for years 11-12, because even with a crowbar you couldn't squeeze the extra 500 or so students into Narrabundah College. The GNCA is aware that a politician with no children believes that a better solution would be to exclude out-of-area students, but the GNCA notes that this could so alienate the out of area parents, who find it convenient to drop their kids off to school in the inner south on the way to work, that enforcement of such a policy might lead to those who espouse it being relocated out of the Assembly.
73. In summary we can look forward to decades of additional expenses for the long enduring rate payers of Canberra, and ongoing years of disruption for local residents as utilities are laid and re-laid, roads are rebuilt, and all the vast infrastructure of modern life installed, and all for what? The additional revenue from the sales tax on the sale of every apartment.
74. And who is going to be in charge of all this gargantuan task? The NCA, a small organisation which has no experience at any of this, and which seems strained to maintain the Commonwealth Bridge? Or you could leave it with the crowd which have been doing this for decades, the TPA. Yes, they are not perfect, and there are no doubt ways they could do better. But at least they have done it all before, and won't be making it up as they go along.
75. The question answers itself. And this is the puzzle. The Commonwealth was so keen to get out of its responsibilities for providing city and suburban services in 1989 that it unloaded it all onto the unwilling Canberra electorate. Why would it want to come back and get involved in this again. For the NCA it might be the joys of spending other people's money, knowing the residents have no way of showing their displeasure if they don't like what you are doing. But why would the Territory agree to such a deal, as they already have their own departments of planning, and city services, and so forth. What can the NCA offer? The whole scheme is crackpot, and the GNCA is puzzled about what either the Commonwealth or the Territory see in the proposal.

76. This submission opened with a quote from the second reading speech which established to NCA. The NCA is here to look after the Commonwealth's National Capital interests, and to avoid involvement in anything that should be the prerogative of the Canberra community.
77. The Inquiry's Terms of Reference are misdirected. The question the Committee should be looking at is why was this suburban "precinct" ever proposed by the NCA, and what do the NCA executive think that they are doing? The old adages still apply. Members need to ask themselves, "Who gains?" "Who loses?" and to "Follow the money". Some attention as to whether the NCA has been fully compliant with all the obligations it bears as a Commonwealth agency would also not be out of place.
78. The GNCA would be happy to answer any questions the inquiry may have about the contents of this submission, and the signer is prepared to appear as a witness.

Yours Faithfully



John Edquist

President
GNCA

4 September 2026

Attachments

Table 1: Blocks within NCA Hume Circle Precinct
Table 2: Schedule of NCA Hume Circle Submissions
Appendix 1: Lack of Clarity of Boundaries of Precinct
Appendix 2: Inadequate NCA Procedures in Publication of Submissions
Submission 33 W. Arthur
Submission 75 Emeritus Professor James Weirick

Inquiry into the National Capital Plan (NCP) Amendment No. 102 - Hume Circle Precinct Submission 32

Blocks within NCA Hume Circle Precinct

Prepared by GNCA in 2026

Based on data extracted from Actmap and other public sources

Address	Division	Section	Block	Zoning	Area (m2)	Name	No. Dwellings
Northern Sector							
91 Wentworth Av	Griffith	26	1	IZ2	2,588	Heritage Area	
2 Mildura St	Griffith	26	2	IZ2	3,816	Heritage Area	
4 Mildura St	Griffith	26	3	IZ2	4,025	Canberra Milk Site	
6 Mildura St	Griffith	26	4	IZ2	3,516	Canberra Milk Site	
8 Mildura St	Griffith	26	5	IZ2	6,112	Bega Group	
129 Canberra Av	Griffith	26	9	CZ2	2,223	Lachlan Valley Meat	
123 Canberra Av	Griffith	26	14	CZ2	1,199	Part of Power Kart	
125-127 Canberra Av	Griffith	26	15	CZ2	8,044	Power Kart etc	
131 Canberra, 8-10 Leeton	Griffith	26	17	CZ2	2,788	iSentia	
10 Mildura, 2-6 Leeton	Griffith	26	19	IZ2	9,272	Thor's Hammer	
12 Mildura	Fyshwick	6	2	IZ2	4,420	Owned by Jega Consortium	
7 Dalby St	Fyshwick	6	6	IZ2	4,093	ACT Fire & Rescue	
19 Dalby, 20 Mildura	Fyshwick	6	9	IZ2	7,587		
17 Dalby St	Fyshwick	6	12	IZ2	4,482		
137 Canberra Av	Fyshwick	6	15	CZ2	4,446		
139 Canberra Av	Fyshwick	6	16	CZ2	3,242		
5 Leeton St	Fyshwick	6	19	IZ2	6,327	3 Mills Bakery	
18 Mildura	Fyshwick	6	23	IZ2	1,407		1
16 Mildura	Fyshwick	6	24	IZ2	21,098	Owned by Jega Consortium	
Inclusion in Block 27	Fyshwick	6	25	IZ2	47		
143 Canberra Av	Fyshwick	6	27	IZ2	6,037	Fire & Rescue Trailer Park	
141 Canberra Av	Fyshwick	6	28	IZ2	5,914		
	Subtotal	Northern Sector			112,683 m2		
					11.3 Hectares		
Southern Sector							
13-15 Sturt Av	Griffith	84	7	CZ2	10,584	Staffordshire Tce	105
	Griffith	84	8	CZ2	6,128	Undeveloped	
53 McMillan Cr	Griffith	84	9	CZ2	4,972	Avalon Apartments	72
47 McMillan Cr	Griffith	84	10	CZ2	5,713	McMillan Gardens	61
7 McMillan Cr	Griffith	29	1	CF	46,331	St Clare's College	
76 Leichhardt St	Griffith	25	3	CZ2	2,608	Friday Apartments	45
74 Leichhardt St	Griffith	25	4	CZ2	2,130	Abrazo Apartments	81
115 Canberra Av	Griffith	25	13	CZ2	2,274	Indigo Apartmemnts	70
113 Canberra Av	Griffith	25	14	CZ2	1,690	Commercial Offices	13
5 Hely St	Griffith	25	16	CZ2	3,418	The Archer	99
2 Hely St	Griffith	87	1	CZ2	6,153	Ramada Diplomat	
	Subtotal	Southern Sector			92,001 m2		
					9.2 Hectares		
	Total Precinct				204,684 m2		
					20.5 Hectares		

In addition, there are the Axiom Apartments, on Block 15Section 25 Griffith which would be effected by any acrtion to connect McMillan Cr with Leichhart St

111 Canberra Av	Griffith	25	15	CZ2	2,042	Axiom Apartments	78
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Schedule of NCA Hume Circle Submissions

Prepared by GNCA in 2026

Based on information provided by the NCA and the submissions themselves

Note: Some 16 submissions appear appear to have been omitted from the release.

These comprise Submissions 4, 9, 11, 15, 21, 24, 36, 37, 41, 46, 49, 52, 69, 82, 89, and 90.

Revised Schedule as at 17 March 2026

		Page	Attitude	Residence
1	1 M McCartney	4	Pro	
2	2 C Emery	5	Neutral	
3	3 Name withheld	6	Con	
4	Submission not published			
5	5 S Bulless	7	Pro	
6	6 T Huber	8	Neutral	
7	7 H Holewa	9	Pro	N'bundah
8	8 Name withheld	10	Con	Staffordshire
9	Submission not published			
10	10 Name withheld	13	Con	Staffordshire
11	Submission not published			
12	12 Name withheld	15	Con	
13	13 Space Lab	17	Mixed support	
14	14 Name withheld	22	Con	Axiom (Sect'n 25)
15	Submission not published			
16	16 Name withheld	23	Con	Sect'n 25 Griffith
17	17 PowerKart Raceway	28	Mixed Support	
18	18 Name withheld	29	Con	
19	19 K Gibbs	35	Con	Staffordshire
20	20 C Hickman	36	Con	Axiom (Sect'n 25)
21	21 Name withheld	37	Con	
22	22 Name withheld	38	Con	
23	23 Name withheld	43	Con	
24	Submission not published			
25	25 M Castello	44	Con	
26	26 L Muholland	45	Con	
27	27 Name withheld	46	Con	
28	28 N Ison and M Roberts	47	Con	Staffordshire
29	29 F Gunn and G Doolan	55	Con	Staffordshire
30	30 ISCCC - interim	61	Con	
31	31 ISCCCouncil – final	64	Con	
32	32 A Remely	70	Con	
33	33 W Arthur	72	Con	
34	34 P Newman	75	Con	N'bundah
35	35 Name withheld	76	Con	
36	36 GNCA letter dated 3 February	77	Con	
37	37 GNCA final submission	79	Con	
38	38 J and S Jedryk	91	Con	
39	39 Name withheld	98	Con	within Precinct

40	40 Name withheld	102	Con	Staffordshire
41	41 Name withheld	106	Con	Axiom (Sect'n 25)
42	42 T Sivasubramanian and N Thirunavukkarasu	107	Con	Sect'n 3 N'Bundah
43	43 Name withheld	111	Con	Sect'n 3 N'Bundah
44	44 Name withheld	115	Con	Sect'n 3 N'Bundah
45	45 W Wang	116	Con	Sect'n 3 N'Bundah
46	Submission not published			
47	47 L Williamson	117	Neutral	
48	48 Pedal Power	119	Neutral	
49	Submission not published			
50	50 Name withheld	123	Con	
51	51 P Jenkins	126	Con	
52	Submission not published			
53	53 Yang	129	Con	Sect'n 3 N'Bundah
54	54 Chan	131	Con	Sect'n 3 N'Bundah
55	55 S Peachey	133	Con	Sect'n 3 N'Bundah
56	56 Deng	137	Con	Sect'n 3 N'Bundah
57	57 L Jenkins	139	Con	
58	58 A Hunter	140	Con	Sect'n 25 Griffith
59	59 Name withheld	142	Con	Sec 25 or Sec 84
60	60 Name withheld	143	Con	
61	61 Andrew Property Group	144	Con	
62	62 Name withheld	158	Con	Staffordshire
63	63 Fyshwick Business Association	161	Pro	
64	64 D Clifford	210	Con	Staffordshire
65	65 J Walsh and L Williams	214	Con	Staffordshire
66	66 J Martin	218	Con	
67	67 C Forss	220	Con	N'bundah
68	68 Public Transport CBR	222	Mixed support	
69	Submission not published			
70	70 K Jones	226	Con	Staffordshire
71	71 L Walsh	230	Con	
72	72 Name withheld	231	Con	
73	73 J Elkington	239	Con	Staffordshire
74	74 M Taylor	244	Con	Staffordshire
75	75 Emeritus Professor James Weirick (UNSW)	250	Con	
76	76 ALDI Stores	259	Pro	
77	77 Name withheld	262	Con	
78	78 Axiom Owners Corporation (111 Canberra Avenue)	265	Con	Axiom (Sect'n 25)
79	79 Stewart Architecture	273	Pro	
80	80 Liam	285	Neutral	
81	81 Name withheld	286	Con	Staffordshire
82	Submission not published			
83	83 Roundhouse Hotels	288	Pro	

84	84 Greater Canberra	303	Pro	
85	85 Beatrice	306	Con	
86	86 Old Narrabundah Community Council	307	Con	
87	87 John Keeley	309	Con	N'bundah
88	88 Nuno Santos	310	Con	
89	Submission not published			
90	90 ACT Government	312	Mixed support	
91	91 Catholic Education Office Canberra Goulburn	336	Neutral	
92	92 Property Council of Australia (ACT and Capital Region)	338	Pro	
93	93 Living Streets	341	Mixed support	

Apologies to any representor who feels their submission has been misinterpreted.

The NCA reports receiving 94 submissions in its 'Consultation Report' of 27 May 2026, but only lists 93 on its website.

11 submissions were not published.

The authorship of 23 published submissions were withheld.

62 Submissions opposed the proposal

9 Submissions supported (including those from ALDI Stores, Fyshwick Business Association, Greater Canberra, Property Council of Australia, Roundhouse Hotels, Stewart Architecture)

6 submissions were neutral, not expressing either support or opposition.

5 submissions expressed mixed support, along the lines of "Support, but need work on"

We have no information on the 11 unpublished submissions

Some submissions indicated explicitly or implicitly where the author lived.

13 Submitters live in Staffordshire Tce,

6 live in Section 25 Griffith (the Axiom and other apartment buildings behind the Ramada Diplomat Hotel)

8 Live in Section 3 Narrabundah (Bega Pl and the south side of McMillan Crescent)

4 live elsewhere in Narrabundah

2 live within the precinct so either in Section 25 or Section 84 (where Staffordshire Tce is located) Griffith

A number of submitters appeared to have a detailed familiarity with Staffordshire Tce but did not claim to live there.

Perhaps they thought their address was irrelevant to their submission.

APPENDIX 1

LACK OF CLARITY OF BOUNDARIES OF PRECINCT

1. The area to be included in the Hume Place Precinct is only defined in an imprecise manner in the draft amendment document issued by the NCA (Draft Amendment 102 Hume Circle Precinct January 2026, referred to as the Draft Amendment).

2. This lack of precision is carried forward into the final Amendment as signed by Minister McBain (National Capital Plan Amendment (No. 102 – Hume Circle Precinct) Instrument 2026 27 July 2026, referred to as the Signed Amendment).

3. The upshot is that the residents of the Axion, an apartment block at 111 Canberra Avenue, do not know whether their building is or is not included in the precinct, as the documents and statements by the Chair are contradictory or confused.

4. The Draft Amendment defines the precinct on p.4 as

“1.2 The site

The area subject to DA102 is largely defined by the Griffin Plan for Hume Circle. This includes land within the circle created by arcs of McMillan Crescent and Mildura Street. In recognition of the existing development and block subdivisions, land included as part of the Hume Circle renewal includes Section 6 and Section 26 Fyshwick but excludes Section 25 Griffith.”

Some of this must be incorrect, as Section 26 Fyshwick lies on the north side of Gladstone St Fyshwick, some distance from Hume Circle.

5. On p.6 of the Signed Amendment, it says *“Figure 3 illustrates the area of land to be included within Designated Areas.”* Fig. 3 is on p.7 and shows the precinct including (moving round Hume Circle in a clockwise direction) the whole of Sections 86, 4, 29, 87, and 26 Griffith, Blocks 3,4,13, 14, and 16 Section 25 Griffith, and the whole of Section 6 Fyshwick. The same area is shown in Fig.145 (why 145?) on p.19, Fig.146 on p.22, and Fig.147 on p.25,

6. To muddy the issue further the Draft Amendment says on p.23 that *“The completed Circle will be publicly accessible and provide a pedestrian-prioritised connection from Canberra Avenue through to Mildura Street.”* This implies Block 15 Section 25 is also included in some way, since this block stands between Canberra Avenue and the continuation of McMillan Cr via the end of Leichhardt St through to the curved portion of Mildura St. A pedestrian prioritised connection sounds like a path through Block 15

7. The Signed Amendment reproduces figures 145, 146 AND 148 in the Draft Amendment at pp. 10, 13 and 21, but Fig. 147 on p.16 shows Block 15, Section 25 Griffith being converted to roadway to connect Leichhardt St and McMillan Cr.

8. It appears that concerns about whether one's apartment building is or is not included in the precinct is trivial compared with the big picture, but for the residents in these areas the status of their block has major implications, and they deserve the attention of the NCA's leaders. It is the GNCA's view that when dealing with people's homes and lives it is of the utmost importance that Government bodies be very precise in the scope and details of any changes that they propose, and refrain as far as possible from hand waving and invocations of modern interpretations of the vague dreams of figures from over a hundred years ago.

APPENDIX 2

INADEQUATE NCA PROCEDURES IN PUBLICATION OF SUBMISSIONS

1. The NCA reports receiving 94 submissions in its 'Consultation Report' of 27 May 2026 but only lists 93 on its website. Some 11 submissions were not published.

2. When Draaft Amendment 102 was released for public comment on 5 January 2025 the NCA was full of hope. On page 9 the section *Permission to disclose name and address* read as follows

“The NCA seeks an open and transparent draft amendment process. Following public consultation on the draft amendment, the NCA will prepare a Consultation Report which will be published on the NCA website. This report will include a summary of each submission. The NCA intends to publish the name of each person making the submission but will not publish contact details (such as physical address, email or phone number).

If you have a concern about having your name published on the internet or wish to make a confidential submission, you must make this clear when submitting your comments. Say why you want your submission to be kept confidential.”

3. This is fairly consistent with the standard practice in the ACT. The City and Environment Directorate (which is responsible for Planning) advises readers on its website that

It's important to note that DA representations form part of the public register. This means they will be published on the CED website for public viewing.

A representor can request that their representation is not published. This can only be granted where:

the publication would disclose a trade secret, or

the publication would, or could reasonably:

endanger someone's life or physical safety or lead to damage or theft of property.

4. The NCA failed to live up to these announced objectives. Not only did it fail to summarise each submission, but it also failed to publish the names of the authors of the submissions, converting its ‘Opt-out of publication’ policy into an “Opt-in for publication policy’. Unfortunately, it failed to tell the public of this substantial change.

5. Reflecting this covert publication policy change, before the submissions were published it emailed every submitter asking if they wished to keep their submission unpublished, or their name private. The NCA's email of 5 March asked:

“Is there anything you need to do?”

If you are happy for your submission to be published including your name - **no action needed.**

If you would like your name withheld (submission will show *name withheld*) or would not like your submission published - please respond to this email by **COB 12 March 2026.**”

6. As the GNCA had no objection to our submission being published, and identified as coming from the GNCA, we took no action.

7. Consequently, we were surprised to find on Monday 16 March that the GNCA's two submissions were not amongst those published. When asked about this NCA staff explained "Published submissions were ones where we had explicit approval or it was clear the email we issued had been opened. According to our email system, info@gnca.org.au had not opened our email from 5 March 2026 and this is why your submissions and some others were not published."

8. To the GNCA this seems a flimsy excuse for not publishing our two submissions.

9. The NCA did publish the GNCA's two submissions, and three others, including that from the ACT Government, the following day Tuesday 17 March 2026. It remains unclear how many of the remaining 11 submissions were withheld because their authors did not want them published, or simply because the authors did not contact the NCA on the day of initial publication (Monday 16 March 2026) to ask why their submissions had not been released. as it is certainly possible that some relied on the NCA complying with the procedure it proposed on 5 March.

10. We remain somewhat puzzled at all this because this was not the procedure outlined in the NCA's email of 5 March, and the email had certainly been opened. However, examination of the GNCA's email client's setting reveals that the option "When I receive a request for a return receipt" the response is set to "Never send a return receipt." We assume that many other respondents have similar settings on their email servers.

11. We have two issues here. Firstly, why did the NCA change its policy on publication, and then fail to tell the public? Secondly, why was the changed policy executed so clumsily with a reliance on covert email receipts?

12. This reliance on automatic receipts can be analysed as two further questions: Why did the NCA's staff assume that all submitters would automatically send a covert receipt when their message was opened? Perhaps such reliance is normal within the NCA, but this suggests a rather paranoid management style.

Why tell respondents "If you are happy for your submission to be published including your name - no action needed." if this is not correct, and you actually want them to explicitly confirm that they are happy for their submission and name to be published?

13. It is unlikely that the 11 unpublished representations met the standard outlined above. If the NCA is to become involved in ACT planning it would be desirable that it moved to comply with local standards and requirements.

National Capital Plan Draft Amendment 102 – Hume Circle Precinct

I oppose the proposal to amend the National Capital Plan to declare about 20 hectares land around Hume Circle to be a Designated Area.

The *Australian Capital Territory (Planning and Land Management Act 1988* defines "Designated Area" to mean an area of land specified in the Plan under section 10.

Section 10 of the *Australian Capital Territory (Planning and Land Management Act 1988* sets out matters to be covered in the National Capital Plan:

- (1) The Plan may specify areas of land that have the special characteristics of the National Capital to be Designated Areas.

Special characteristics?

So, does the area around Hume Circle have special characteristics of the National Capital?

No. The land use in those 20 hectares is just ordinary suburban land comprising a mix of apartment buildings, some low-rise office space, some light industrial use, a hotel as well as an emergency services station.

Walter Giffin's Plans

The supposed justification for the Proposal is that it would give effect to Walter Griffin's plan for Canberra in a modern context.

Griffin's plans of 1910 should not be given unstinting reverence. There are lots of things in Griffin's plans which have never been implemented and which now would be impractical to implement.

If you look at Figure 2: Extract from Griffin plans (Hume Circle referred to as Eastlake circle) on page 4 of the Background Paper, it shows the roads radiating from Hume Circle. As I live very close to this area I can comment on each of the seven roads shown in the plan:

To the South - Sturt Avenue has been built

To the South West – no road has been built. Instead we now have St Clare's College. To give effect to Griffin's plan would require its demolition.

To the North West - Canberra Avenue has been built

To the North - Wentworth Avenue has been built

To the North East – no road has been built. This appears to have been Griffin's plan for a tramway or railway to Civic. There was a railway line but the bridge carrying it got washed away in the 1922 floods, and never replaced. This flood probably accounts for why we now have the Canberra Railway Station in its present location. rather than being in or near the city centre. To give effect to Griffin's plan now would require demolition of some industrial buildings, the Canberra Railway Station and some apartments in Kingston

To the East – no road has been built. To give effect to Griffin's plan now would require demolition of some industrial buildings

To the South East - Canberra Avenue has been built

Events have moved on in the 115 years since Walter Griffins plan of 1910. In fact, if you research the records there appear to be a number of versions of the plans by Walter Griffin and Marion Mahoney, all differing. For example, the street in which I live, Wills Street, partially appears in the diagram on page 4, but more so in other versions that I have seen.

If the National Capital Authority wants to be faithful to Walter Griffin's plan then it ought to require the Australia War Memorial to have a casino inside the War Memorial. After all, Griffin nominated that location as a site for a casino!

ACT Territory Plan

The Proposal is inconsistent with the existing Territory Plan.

The Territory Plan zones areas around Hume Circle as follows:

To the west - CF Community Facilities. These are currently St Clare's and St Edmund's College

To the north and south - CZ2 Commercial and Business. These are currently apartments and a hotel

To the east - IZ2 Industrial Mixed Use

To the north - TSZ2 Services. This is currently the railway station and rail facilities

Given major housing in Kingston, Griffith and Narrabundah to the north and west of Hume Circle and major light industrial and retail areas of Fyshwick to the south east, this zoning seems entirely appropriate and makes for a good transition between the residential and light industrial areas. While the ACT Government's planning regime is far from perfect, one of the things that people want from zonal planning is the predictability that zoning brings, provided the rules are enforced. I cannot imagine the National Capital Authority could significantly could improve on this.

Further, the ACT Territory Plan is subject to democratic safeguards. Amendments to the Territory Plan can be disallowed in the Legislative Assembly. And politicians who make amendments which are very unpopular can be voted out. We cannot vote out the National Capital Authority.

Wayne Arthur

2 February 2026

17 February 2026

Ms Karen Doran PSM
Chief Executive
National Capital Authority
GPO Box 373
Canberra, ACT 2601



EMERITUS PROFESSOR JAMES WEIRICK
School of Built Environment

Attention: Mr Andrew Smith, Chief Planner

By email

Dear Ms Doran,

National Capital Plan Draft Amendment 102 – Hume Circle Precinct (DA102)

Thank you for the opportunity to comment on National Capital Plan Draft Amendment 102 – Hume Circle Precinct (DA102).

I make this submission in my personal capacity as a concerned citizen based on the DA102 documentation uploaded to the website of the National Capital Authority.

Hume Circle Precinct, Sections 6 and 26, Fyshwick is a long-neglected part of South Canberra principally known for its dangerous road intersection. Its revitalisation is long overdue. Its potential was identified in the 'Griffin Legacy' study undertaken by the National Capital Authority in 2002-2004. Under the category '21st Century Opportunities,' Hume Circle was listed as a future 'gateway and elegant rond point reinforced by integration of land use, transportation and urban form.'

Unfortunately, DA102 does not achieve this. Neither the Draft Amendment itself, nor its background paper, demonstrates a credible integration of land use, transportation and urban form.

The problem with DA102 in its current form has resulted from inadequate research, site analysis, urban design and approval process.

1. Poor Research

1.1 The 'Griffin story' on which DA102 relies is inaccurate.

1.2 In Part 1.1.2. under 'Griffin vision' DA102 states, 'The Griffins envisaged that Hume Circle would become a major gateway . . .'

1.3 The 'Griffins' – i.e Walter Burley Griffin and Marion Mahony Griffin – did not design Hume Circle. It was designed by Griffin alone. The circumstances under which Griffin alone designed this part of Canberra are vital to understanding the intent of the scheme.

- 1.4 The 'Hume Circle' rond point was designed by Walter Burley Griffin during his first visit to Australia between August and October 1913. Marion Griffin remained in the United States at that time.
- 1.5 The 'Hume Circle' rond point and associated avenues were designed by Griffin in response to discussions he had on arrival in Australia with the members of the Departmental Board (Miller, Owen and Scrivener), who had been building Canberra according to their plan, not the Griffin Plan, since 1912.
- 1.6 In attempting to respond to the Departmental Board's concerns, in particular their insistence that the first part of the city had to be built to the south-east of Capitol Hill, Griffin revised the competition-winning scheme he and Marion had designed in 1911 to include an 'Initial City' where the Departmental Board wanted it.
- 1.7 He also revised this part of the city plan in response to the major infrastructure works that were underway according to the Departmental Board Plan – the Power House (poorly located at what became Kingston) and the Queanbeyan-Canberra railway (poorly aligned in response to the poorly sited Power House).
- 1.8 In addition, Griffin responded to criticisms of his stormwater scheme by the Departmental Board and others by incorporating a perennial stream in the linear element that became Telopea Park, which bifurcated the avenues leading to Capitol Hill (today Canberra Avenue and Wentworth Avenue).
- 1.9 These changes were incorporated in the 'Preliminary Plan,' dated October 1913, which Griffin prepared with the assistance of Australian architect A.J. Macdonald, and explained in his report 'Observations Explanatory on the Preliminary General Plan.'
- 1.10 On the coloured '800 feet to 1 inch' plan (1: 9600) accompanying this report, the rond point that is the subject of DA102, is clearly marked as 'Suburb' (Figure 1). It was conceived as the centre of a suburb of the Initial City. It was not singled out as a 'gateway.' Indeed, to my knowledge, Griffin never used the term 'gateway.'

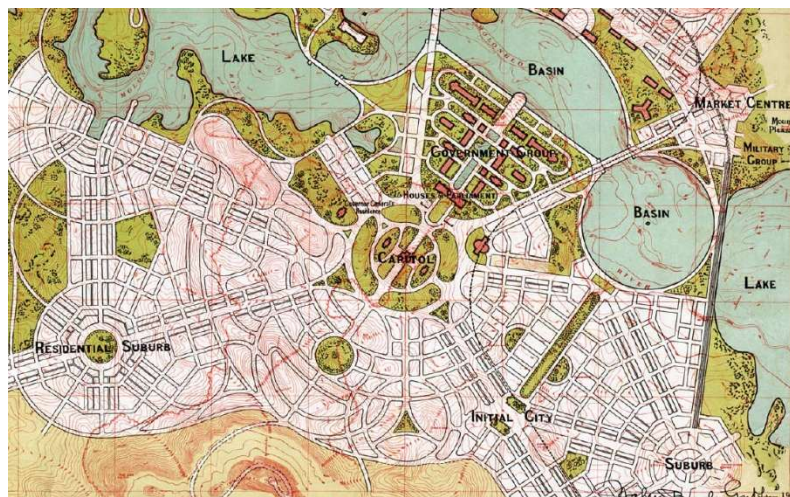


Figure 1. Walter Burley Griffin, 'Canberra, Federal Capital of Australia, Preliminary Plan,' October 1913 (detail). The rond point that is the subject of DA102 is clearly marked as 'Suburb' of the 'Initial City,' not 'Gateway.' Source: Reid, P. 2002, *Canberra following Griffin: a design history of Australia's National Capital*, National Archives of Australia, Canberra, p.110.

- 1.11 The 'Preliminary Plan' also shows the railway proposed in the Griffins' competition winning scheme tunnelled under the rond point, which was located on a knoll approximately 35-40 feet (11-13m) above the level of the Molongo River.
- 1.12 DA102 describes this rail line as a link to the city 'through a scenic rail approach route along The Causeway.' It was far more than this. It was planned as the mainline link to Sydney and Melbourne through Yass Junction, a mainline engineered to express passenger standards, which would also serve as a suburban rail line within the city limits of Canberra.
- 1.13 In addition to the central station shown in the Griffin Plan at the Market Centre (today's Russell) and another key station at the Civic Centre (today's City), the 'Hume Circle' rond point was planned as the site for one of eight suburban stations on the line, as shown in Griffin's 1918 plan, i.e. it was conceived as one of eight suburban centres, not a unique eastern 'gateway.'
- 1.14 The 1918 plan was produced by Walter Burley Griffin and his assistants in the Melbourne office he headed as Federal Capital Director of Design & Construction, located in a government office building near the Melbourne GPO. Once again, Marion Mahony Griffin was not involved. She worked in the Griffins' separate private office, located at 395 Collins Street, Melbourne, with no day-to-day involvement in the planning and design of Canberra.
- 1.15 The 1918 plan for the 'Hume Circle' rond point, known in Griffin's time as Eastlake Circle, clearly shows the complexity of siting a suburban railway station in the central circle of a rond point. The railway station is shown on a north-south diagonal of the circle, in a tunnel or possibly a cutting (Figure 2).



Figure 2. Walter Burley Griffin, 'Canberra, Plan of City and Environs,' 1918 (detail) showing the 'Eastlake Circle' rond point with Eastlake station at its centre on the main rail line of the Griffin Plan aligned north-south in a tunnel, or possibly a cutting, one of eight suburban stations on the line. Source: Nicholls Collection, National Library of Australia, 3665962.

- 1.16 It is reasonable to assume this was a design solution similar in concept to the 'Carrefour à giratoire' proposed by the French urbanist Eugène Hénard for the intersection of Rue de Richelieu and Boulevard Haussman, Paris in his *Études sur les transformations de Paris* of 1903-1909, a well-known work of the international town planning movement c.1910 (Figure 3)

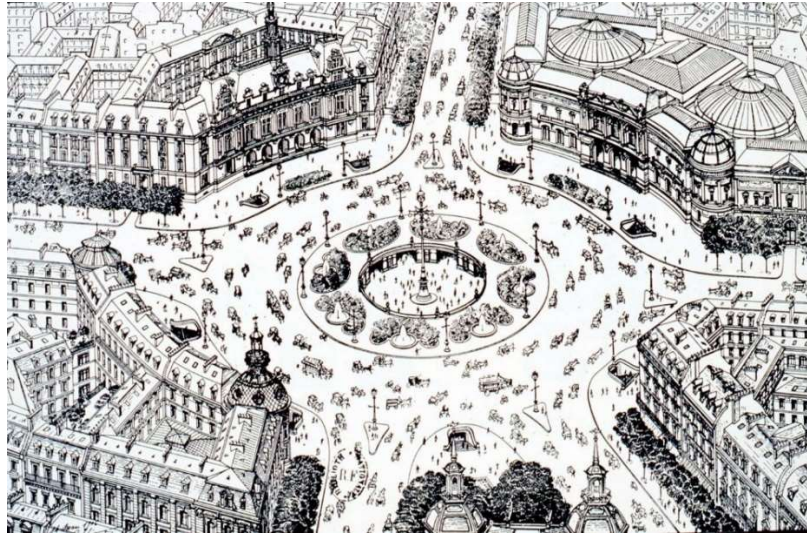


Figure 3. Eugène Hénard (1849–1923), 'Carrefour à giratoire' proposed for the intersection of Rue de Richelieu and Boulevard Haussman, Paris - a scheme featuring a sunken central plaza access by pedestrian subways under the traffic roundabout. Source: Hénard, *Études sur les transformations de Paris*, 1903-1909

- 1.17 Given the traffic congestion of the day (still with horse-drawn cabs and horse-drawn omnibuses), Hénard proposed a system of pedestrian access to and from a central sunken plaza by means of radiating pedestrian subways under the traffic roundabout. We can imagine the Griffin scheme was based on this concept, with a sunken or underground suburban railway concourse similar to Hénard's central sunken plaza, ringed by radiating pedestrian subways giving access to the ring of buildings around the rond point.
- 1.18 In this respect, the DA102 description is correct. The 'Hume Circle' rond point was envisaged by Griffin as an 'activity hub.' Note, however, that pedestrian activity would be generated from the very centre of the rond point with residents of Canberra going about their daily business to and from the suburban railway station.
- 1.19 As designed by Walter Burley Griffin, the 'Hume Circle' rond point would be an activity-generating work of urban infrastructure from its very centre, not a monumental 'gateway' like the Place de l'Étoile and the Arc de Triomphe in Paris used occasionally for grand ceremonies; or a banal circle of inaccessible grass and ornamental trees, like the centre of Hume Circle today (and as proposed in DA102); or a private green beyond iron railings like the centre of The Circus, Bath.
- 1.20 What has been built at Hume Circle over the years, and what is proposed by the NCA in DA102 today, is a caricature of the Griffin concept. The work of 'the Griffins' should not be evoked to give this caricature legitimacy or credibility.
- 1.21 'No tall buildings' was one principle of the Griffin Plan that was established in the competition-winning scheme of 1911 by Walter and Marion Griffin that endured through the Griffin phase of Federal Capital design and construction, and on to the early 1950s.
- 1.22 In the report Griffin submitted with the competition entry, he stated quite clearly that the Australian Federal Capital did not need tall buildings, or 'units' as he termed them:

With a liberality in public space, and judicious distribution of centers and directness and speed in communication between all points, the necessity of making these large units stand on end, as in the congested American cities, can be avoided in a Capital City at least, securing a horizontal distribution of the large masses for more and better air, sunlight, verdure and beauty.

1.23 In this statement, Griffin made clear that the principle of horizontal building masses was integral to the spatial qualities, land use pattern, transportation and communication network, open space system, landscape, amenity, health, beauty and national significance of the city.

1.24 Griffin stated and re-stated this principle on many occasions. The original can be found in Walter Burley Griffin, 'Competition Plan – Original Report. Federal Capital Design Entry No.29' (1911) in: Dustin Hadley Griffin. *The Writings of Walter Burley Griffin*, Cambridge University Press, Cambridge, 2008, p.9; reiteration can be found in Walter Burley Griffin. 'Canberra II: The Federal City Site and its Architectural Possibilities,' (1913) in: D.H. Griffin, *Griffin Writings*, p.74; Walter Burley Griffin, 'The Canberra Plan,' (1914), in: D.H. Griffin, *Griffin Writings*, p.85.

1.25 The superb set of competition drawings prepared in Chicago under the direction of Marion Mahony Griffin (a number of the Griffins' relatives and assistants worked on the renders), supported this clear, unequivocal statement. Presenting the Griffin Plan in elevation, section and perspective, this set of drawings shows no tall buildings. It features public buildings on the skyline, such as the Town Hall on City Hill crowning the Civic Centre. No tall buildings surround the Town Hall. In inner city precincts, there are no tall towers, 3-4 storey perimeter block apartments are shown defining street space in broad horizontal masses.

1.26 No cluster of tall buildings is shown on the far periphery of the city, marking a 'gateway.' This was not a Griffin concept, and to infer that it was, as DA102 implies, is deeply misleading.

1.27 The National Capital Plan (1990), as amended, includes the following statement in the 'Matters of National Significance' listed in Part 1.1 of the Plan:

- *Respect for the key elements of the Griffins' formally adopted plan for Canberra.*

1.28 The National Capital Authority does itself no favours in distorting the historical record with respect to the Griffin Plan, instead of complying with the spirit and letter of this 'Matter of National Significance' by grounding use of the Griffins' names on sound historical research and deep understanding.

2.0 No Site Analysis and Civic Survey

2.1 The 'gateway' concept the NCA is promoting for the Hume Place Precinct in DA102 is a NCA concept, with nothing other than two-dimensional circular geometry to link it to the Griffin Plan.

2.2 The NCA therefore needs to build a case for the DA102 design proposition in its own terms, with clear, supporting evidence.

2.3. This the current Draft Amendment fails to do.

2.4 In the Draft Document itself, and the supporting Background Paper, the NCA provides no site analysis, and no civic survey.

- 2.5 This is in stark contrast to the documentation prepared by the former Environment Planning & Sustainable Development Directorate of the ACT Government in February 2024 for the 'East Lake Place Plan' – a 98-page document, with 45 pages devoted to understanding people, understanding place, global benchmarks and 'vision and place' principles.
- 2.6 The DA102 documentation provides no fundamental information of this nature.
- 2.7 There is no information on population numbers and mix; no information on site topography; no information on site opportunities and constraints; no information neighbourhood context; no information on economic trends and development feasibility; no information on land ownership; no information on ultimate yields in terms of dwelling units, retail space and commercial space; no information on precedents and benchmarks; no information on guiding principles of design.
- 2.8 To take one obvious example of missing site information, fundamental to any design solution at such a notorious traffic tangle, there is no information on existing and future traffic volumes through Hume Circle, and the impact these traffic volumes are likely to have on physical safety, residential amenity, and options for alternative modes of transport, such as light rail.
- 2.9 Note that the *Canberra Travel Modelling Report* prepared for Infrastructure Australia by Veitch Lister Consulting in 2014 predicted a 40% increase (+14,200 vehicle movements) in the daily weekday traffic volume on Canberra Avenue passing through Hume Circle between 2011 and 2030 (Figure 4). Where is that prediction today?

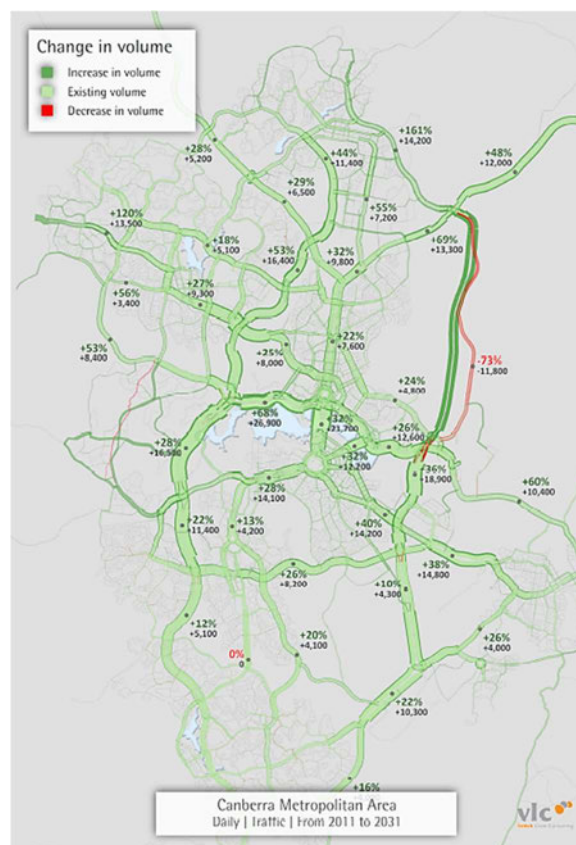


Figure 4. Predicted increase in weekday daily traffic, Canberra Metropolitan Area, 2011-2030 – note the 40% increase (+14,200 vehicle movements) on Canberra Avenue at Hume Circle. Source: Veitch Lister Consulting (2014), *Canberra Travel Modelling Report*, Prepared for Infrastructure Australia, The Consultants, Sydney, p.26.

2.10 The idea of revitalising the area around Hume Circle with infill development is not without merit, but advancing a single, schematic solution devoid of supporting analysis is completely unacceptable.

3.0 No Urban Design

3.1 The NCA provides no urban design for the Hume Circle Precinct in the DA102 documentation.

3.2 DA102 contains a schematic, two-dimensional plan of a 'Building Height Framework' for the Hume Circle Precinct (Figure 5), but no three-dimensional views and no representation of urban space.

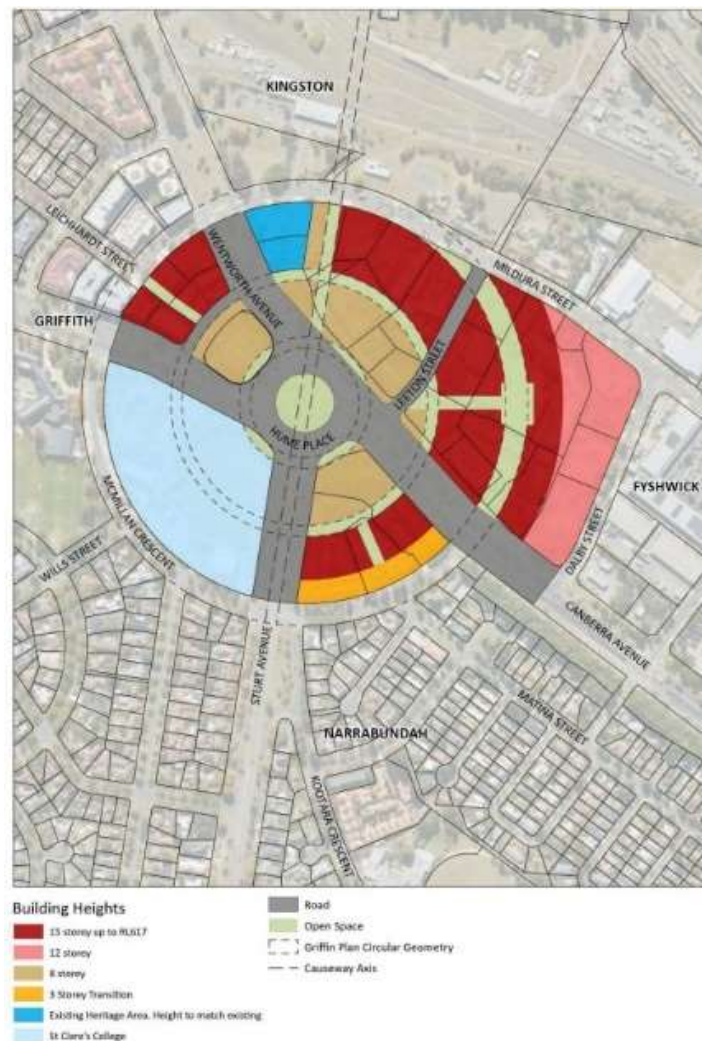


Figure 5. National Capital Authority, 'Hume Circle Precinct – Building Height Framework,' National Capital Plan Draft Amendment 102 – Hume Circle Precinct, the extent of physical design details in the document, a two-dimensional representation of building heights in generalised bands. Source: DA102, p.25.

3.3 It does not achieve the 'integration of land use, transportation and urban form' identified as a '21st Century Opportunity' in the NCA's 'Griffin Legacy' report of 2004 (p.139).

- 3.4 DA102 provides no constituent elements of urban development and design: no feasibility or business case, no traffic plan, no configuration of infrastructure components, blocks and lots; no information on sustainability; no configuration of a green and blue network; no representation of building types and footprints; no details of street structure, building interface conditions and active frontages; no shadow analysis; no commitment to public facilities; no provisions for implementation etc.
- 3.5 DA102 does not develop and test design options, and present a convincing, evidence-based preferred option.
- 3.6 Instead, DA102 presents a pattern of building heights as a *fait accompli* in generalised concentric bands, including an outer band up to the Central Canberra height limit of RL617 capable of generating 15-storey buildings (Figure 5).
- 3.7 As demonstrated in City around London Circuit, developers will push their schemes to this height limit, successfully challenging any idea of restricting buildings of maximum height to limited 'gateway' locations on aesthetic grounds.
- 3.8 DA102, if approved in its current form, will give developers carte blanche to do this.
- 3.9 The very special architectural expression of the buildings intended to partially ring Hume Circle, suggested by the notion it could become an 'elegant rond point,' is not codified in DA102, but put off to some future date:

High quality housing has a vital role to play in ensuring the Hume Circle Precinct attracts long-term residents and becomes one of Canberra's most liveable areas. Without a focus on design quality, there is a risk new homes will compromise residents' living experience and not be adaptable or flexible for future needs. Future work will codify the NCA's expectations regarding the quality of living environments created within Hume Circle (DA102 Background Paper, p.10, emphasis added).

- 3.10 This does not inspire confidence. The NCA should have codified design standards for Canberra apartments decades ago.
- 3.11 The approach adopted by the NCA to architectural design in this instance, and urban design overall – 'trust us, the details will come later' – is fundamentally flawed.

4.0 Dysfunctional Approval Process

- 4.1 For many years, the NCA has adopted an approval process for National Capital Plan amendments that simply does not work.
- 4.2 As explained before a Senate Estimates meeting on 9 January 2026, the process starts at a 'high level' with 'no detail of any particular proposals or developments.' This describes DA102 in its current form: no detail apart from generalised building heights as an invitation for otherwise unregulated development.
- 4.3 Once this 'high level' amendment gains approval as a generalised form of statutory control open to all sorts of interpretation, an attempt is made to impose some regulation by means of 'Detailed Conditions of Planning, Design and Development.'

4.4 The failure of this approach is demonstrated by the fate of the 'Griffin Legacy' amendments, which gained Ministerial approval in 2006 without Parliamentary oversight. These amendments were put forward at the same 'high level' of generality we see in DA102, without specific, measurable, meaningful details of urban development and design.

4.5 The result: in twenty (20) years from 2006 to the present, the 'Griffin Legacy' amendments have proved difficult, if not impossible, to implement.

4.6 A53 Albert Hall Precinct was abandoned. A59 City Hill has taken the best part of twenty years for the London Circuit carparks and 'clover-leaf' elements of the NCDC-era road system to begin to be developed. A60 Constitution Avenue has yielded a sporadic pattern of spot developments, an out-of-place ASIO Headquarters, developers' architecture unworthy of the National Capital, and a 'Champs-Élysées' makeover of Constitution Avenue for half its length. A61 West Basin is yet to see anything built on the newly-filled East Acton waterfront.

4.7 This is a record of failure.

4.8 The approval process for National Capital Plan amendments is the wrong way round. Detailed 'urban design frameworks' need to form the basis for statutory controls, not statutory controls forming the basis for 'urban design frameworks.'

5.0 Conclusion and Recommendations

5.1 DA102 in its current form is a flawed proposal, the result of poor research, no site analysis, no civic survey, no urban design – and subject to a flawed approval process.

5.2 Recommendation 1: DA102 should be withdrawn and re-worked in the form of an 'urban design framework' based on sound historical research, rigorous site analysis, a rigorous civic survey and effective public consultation.

5.3 Recommendation 2: Statutory controls then need to be proposed to implement the 'urban design framework' and submitted to the Minister for Regional Development, Local Government & Territories with the recommendation that this Draft Amendment to the National Capital Plan in revised form – robust, detailed, defensible – be placed before the Joint Standing Committee on the National Capital and External Territories for Parliamentary review, public hearings and report before final approval.

I agree for this submission to be made public.

Yours sincerely,



Emeritus Professor James Weirick



cc. The Hon Kristy Bain MP, Senator David Pocock, Emeritus Professor Helen Lochhead AO