



Territory Plan Comments,  
EPSDD,  
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Dear Sir/Madam

## **ISCCC Submission on DV348 on Active Living**

### **Overview**

The Inner South Canberra Community Council (ISCCC) is a peak group of primarily suburban residents' associations.

The ISCCC welcomes the ACT Government's intention to incorporate Active Living principles and provisions in the ACT Territory Plan.

However, we note that the vast majority of the proposed provisions are included as Criteria rather than Rules, meaning that they are not mandatory. This is likely to reduce significantly their implementation.

In our view, some of the key provisions need to be mandatory.

Another general comment relates to DV348's frequent references to pedestrian and cyclist access. Any policy intended to encourage walking and/or cycling must ensure that shared paths exist and that they are of an appropriate standard. Many areas in the newer suburbs are without footpaths, and those in the inner suburbs are often in poor condition. Furthermore, if it is intended that pedestrians and cyclists share use of a path, then the path must be made wide enough to accommodate both sets of users with safety.

### **1. Statement of Strategic Directions**

The ISCCC supports the inclusion of the six Active Living Principles in the Statement of Strategic Directions.

It is pleasing to see the application of such principles not only to new suburban developments but to all "new developments and re-developments."

It is also heartening to see a continuing commitment to Canberra's urban form as "a series of discrete urban areas within a landscape setting of hills, ridges and other open spaces".

However, we have some concerns with *Principle 3: MIXED LAND USE AND DENSITY: Encouraging diversity in activities, land uses and development densities*

Diversity can be beneficial, but it should be consistent with the relevant Master Plans for the Precincts, rather than implemented according to the developer's goals. Master Plans should be developed for Precincts so that the diversity in the developments meets the community's requirements. Consequently, it should be made clear that the statement on page 12 "c) encouraging mixed land use and density" can only be applied within the approved and relevant Master Plans.

## 2. Residential Zones Objectives

**The ISCCC supports the addition of the following** new objective to RZ1 Suburban Zone, RZ2 Suburban Core Zone, RZ3 Urban Residential Zone, RZ4 Medium Density Residential Zone and RZ5 High Density Residential Zone:

- Promote active living and active travel

In addition, as noted earlier in this submission, if people are to be more active in suburban areas, we need better quality footpaths. At the same time, there should continue to be adequate provision for public transport and car parking, as many members of the community continue to rely heavily on buses and cars.

## 3. Commercial Zones Objectives

The ISCCC supports the addition of provisions in commercial zone objectives that:

"Provide a high quality public realm by facilitating active uses on ground floor level that connects with the wider open space, pedestrian and cycle networks to promote active travel and active living." Indeed, the ISCCC considers this should be a Rule rather than just a Criterion. Furthermore, it would be appropriate for similar principles to be applied to CZ6 as well.

We note the proposed insertion of the following wording for commercial zones and consider that similar wording should be inserted for residential zone objectives. "Encourage an attractive, safe, well-lit and connected pedestrian environment with convenient access to public transport". Of course, it is important to define what is meant by "well-lit".

Active living would be supported by adding a provision in the Territory Plan encouraging shading in summer and solar access in winter in such commercial zones. Shading (such as awnings and trees) in commercial areas, especially where there is pedestrian traffic, is important in very hot weather. This means deciduous trees, effective overhead awnings and avoidance of heat banks such as concrete slab pavements (such as at the Kingston Foreshore).

Also the ISCCC supports wider footpaths on major pedestrian routes such as from the Sydney Avenue offices through to Kingston and Manuka. Some footpaths in older areas also have no lip to the road (just an unbroken curb) meaning people pushing prams, riding bikes or on mobility scooters cannot easily cross roads - ALL paths should have lips to the road.

## 4. Industrial, community facility, urban open space, restricted access recreation, transport zones

The ISCCC supports the addition of a reference to active travel and access to public transport in industrial and transport zones, and active living and travel in community facility and open space and recreation zones.

## 5. Multi-unit Housing Development Code

### Element 4: Site Design

It is pleasing to see an increasing focus on active living and travel in the site design provisions in the multi-unit housing development code. However, the provisions are in the Criteria rather than in the

Rules and hence not mandatory. As a consequence, it is questionable whether this will have a substantive impact on what is actually built in Canberra.

The ISCCC is concerned about the frequent use of the terms 'reasonable' and 'sufficient', which already exist in the Territory Plan and continue to be used in this draft variation. Such terms should be defined. The phrase 'sufficient off-street car parking' in draft variation of the Multi Unit Housing Development Code, for example, is extremely subjective. We would prefer all references to car parking be linked explicitly to the Parking and Vehicular Access General Code.

The ISCCC would also like to stress that the requirement for service vehicles to enter and exit commercial premises in a "forwards" direction must apply also to multi-unit developments. This is important for the safety of pedestrians, cyclists and all road users.

#### **6. Commercial Zones Development Code**

While pleasing to see the proposed changes to the Commercial Zones Development Code, we note once again that the proposed provisions are not mandatory, and hence unlikely to have a significant impact on development in Canberra.

Proposed additions to C3 Commercial Zones Development Code (DV348 pp18-19) contain provisions that are far too vague. For example, what is 'minimal reflected sunlight'? Also, what does the following phrase actually mean in practical terms? "a) a contribution to the amenity and character of adjacent public spaces."

#### **7. Community and Recreation Facilities Code**

The ISCCC would like to re-iterate here similar comments as above in relation to the proposed revisions to this code being discretionary rather than mandatory.

#### **8. Estate Development Code**

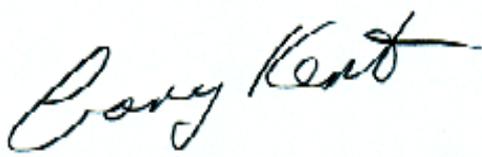
This appears to be the only proposed provision that will be included as a rule. It provides for "well-lit and connected walking access" to bus stops. However, there is no guidance here on what is meant by "well-lit", and no objective standards are set, unusually for a Rule.

#### **9. Conclusion**

As noted at several points during this submission, the proposed provisions for the most part are Criteria in the relevant Codes, not Rules. Therefore, while desirable to make clear the Government's intent in the Territory Plan, DV348 is unlikely to make a significant impact on what is actually built in Canberra.

The Government's efforts would be better spent on identifying the key outcomes that it is seeking and then embedding well defined and measurable rules in the ACT Territory Plan, and undertaking regular monitoring and evaluation to ensure the outcomes are met.

Kind regards



Gary Kent  
President  
10 February 2017