



DRAFT TERRITORY PLAN & TUGGERANONG DISTRICT PLAN

Submission by Tuggeranong Community Council

The Tuggeranong Community Council (TCC) is an incorporated, voluntary, not for profit, non-political, community-based association operating within the Tuggeranong District of the Australian Capital Territory. The TCC is formally recognised as the peak community body representing the interests of the local residents and the communities within Tuggeranong Valley. We wish to express some of our concerns and opinion on the Draft Territory Plan and Draft Tuggeranong District Plan.

Draft Territory Plan

TCC acknowledges the major reform now being undertaken by the ACT Government and Planning Authority. This reform will result in significant changes to the process of Planning and its assessment in the ACT and while we can see the potential improvement in the system, like many in the community we represent, there are concerns that the changes will not have the desired outcomes we are expecting.

We believe that this results from two broad reasons. The first being that much of the supporting detail documents are not part of the formal Territory Plan and there is concern that the legal status and ability for the details to be enacted will be downgraded through appeals and lack of legal enforcement. The second is that much of the detail is still to be finalised and made public, resulting in our uncertainty that these details will meet the expectations proposed by Government intentions.

These details include:

- Technical Specifications
- Urban Design Guide
- Housing Design Guide
- Other Guides
- Guide to Community Consultation now mandated in the proposed Planning Act.
- Upgrade of the web site with improved public access and ease of use, leading to better transparency.

The resources required to complete the Planning Reform remain considerable and TCC implores all levels of Government to maintain this considerable input to complete the documents and ensure the link to the Territory Plan is solid and the outcomes for the ACT will be achieved.



The government also need to take into consideration:

- Ensuring placement of various facilities throughout Canberra to give access to all communities, e.g. swimming pools, basketball courts and other sporting and community facilities.
- Ensuring facilities in one District does not negatively affect the environment of others, such as waste facilities close to residential areas.
- Ensuring we have an adequate water supply for the projected significant increase in population.
- Retain the requirements in Variation 369 – Living infrastructure, in the Territory Plan.

Tuggeranong District Plan

TCC is concerned that the *Draft Tuggeranong District Planning Strategy* does not represent the Character of the District, in that Tuggeranong is an outer district 20 kms or more from the City Centre. It is suburban in nature and the open feel and view to surrounding bushland hills is its strong attraction. This is acknowledged on the first page of the Summary document setting out what residents value about Tuggeranong.

The Strategy document appears to be generic in nature and proposes the same Urbanisation for all of Canberra.

The first part of the Strategy includes projected population for all ACT Districts, with growth in Tuggeranong being modest with 3,000 new dwellings by 2046 and 4,800 by 2063. TCC observes that this will be an increase in population from 89,460 in 2021 to 100,700 by 2063, a figure the 2018 Planning Act said we would get to in 2041. This will take Tuggeranong back to the population at its peak.

The Strategy proposes that this increase will be achieved with 100% infill and no new greenfield areas. TCC supports this proposal and supports no expansion into new areas and in particular the Murrumbidgee River corridor.

The recently released population projections from ACT Treasury indicate that there will be practically no growth in the Tuggeranong District. TCC observations is that Tuggeranong is still growing and there is a demand for homes with the values offered by the Tuggeranong District. We believe that a modest growth should be included in the Planning Strategy and that further investigations and planning incorporate the ability to enhance the facilities of the Tuggeranong District to encourage sustainable growth while retaining Tuggeranong's character.

The four-page Summary Brochure of the Tuggeranong Strategy contains a *Draft Tuggeranong District Strategy Plan* showing the proposals for the Five Drivers in Tuggeranong. The Sustainable Neighbourhoods driver indicates a significant area outside of the Town Centre and Group Centres as *Future Investigation Areas*. While the areas seem larger than necessary the summary indicates that '*Further detailed analysis and modelling to identify future housing needs not able to be met by proposed, possible and potential change areas across the Tuggeranong District*'. The future investigation areas seem reasonable in the context of the need for further



analysis and refining of potential growth areas. The Plan is repeated in the Strategy document and appears in a similar form several times including Fig. 31 on pages 94, 95 which has a note added that 4,000 to 4,400 of the 4,800 dwellings can be provided in the future change areas, which are the Town Centre and Group Centres. Very little growth would then be required outside of the Town and Group Centres.

However, in Fig. 36, *Tuggeranong – Sustainable neighbourhoods*, on page 110, 111, setting out details for the *Sustainable Neighbourhoods Driver*, it appears the detailed analysis and modelling has been forgone and housing types have been determined for the full future investigation areas. This includes substantial high rise buildings remote from the Town and Group Centres. While theoretically, it might be possible to fit a significantly larger number of dwellings in the proposal on Fig. 36 including high rise of over 6 storey well away from any Centre, this would be inappropriate for the Tuggeranong District and from the analysis provides in the Strategy is unwarranted. Fig. 36 needs to be significantly amended to reflect the Plan as shown in the summary brochure and several times earlier in the Strategy, as well as reinforcing the need for further investigation, which would include Community Consultation and Engagement.

Appendix 1 of the Strategy sets out the Transect Characteristics. General Urban (T4) up to 3 Storey; Urban Centre (T5) up to 6 Storey; and Urban core (T6) high rise greater than 6 Storey, are proposed for the future investigation areas. T6 by definition is suitable in Urban Centres yet in the Tuggeranong District Plan, it is proposed several kilometres from any Centre. T6 is not appropriate or warranted in the Tuggeranong District with perhaps the exception of the Town Centre where any proposal should be of very high standard and in keeping with the views to the surrounding bushland hills. T5 type dwellings are more appropriate in the Town and Group Centres and considerable analysis and community consultation and engagement is necessary before adoption outside of the Centres.

The Tuggeranong District Implementation Plan's initiatives generally involve further analysis, modelling or other planning investigations. While the District Strategy would be acceptable with the above amendments there is a need for an immediate update to be undertaken to address much of the identified details in order for the District Plan to be of value in support of the Territory Plan. TCC requests that an update of the District Strategy be undertaken within one year with community consultation and engagement.

Strategic Movement to Support City Growth

The Strategy projects an increase in Active Transport and Public Transport across the ACT. While TCC is supportive of this approach the Strategy again appears to be generic in nature and suggests that what is appropriate for the City Centre and highly urbanized areas is also appropriate for the outer suburban district of Tuggeranong.

TCC notes that the average trips by car in the ACT is 76% of trips while Tuggeranong is significantly higher at 82%, reflecting the longer and divergent trips from the district.

The proposal to reduce dependency on travel by car is based on:

- Increasing public transport journey to work from 7.1% to 10 – 15%
- Increasing walking and cycling from 16.9% to 25 – 30%

Even if this was achieved for Tuggeranong, trips by car would still be the major form of travel. Note also, that the ACT government is promoting Electric cars. Generally, the trips by car would drop from 76% to 65 – 55%. Tuggeranong will possibly be several percentage points higher, possibly over 70% of trips by car in the future.

Additional incentives to further reduce car trips could result from an increase in local work opportunities such as the provision of hot desk facilities in Tuggeranong for ACT public servants and Australian government departments.

The Tuggeranong District Strategy needs to acknowledge that car travel will remain a major form of transport into the future and an efficient arterial road network is needed. Speeds on the arterial roads, currently 80kph, should be retained to allow for efficient travel by car to other Centres including the City Centre.

The parking requirements for development should also reflect the ongoing reliance on private car transport. Change to electric vehicles will also increase the need to have private parking with charging points in dwellings.

Appendix 2 seems to promote the conversion of roads into Urban Boulevards. The arterial road system in Tuggeranong generally has been developed along the major watercourses such that the road reserve incorporates significant floodways and wide buffer zones for noise abatement. Buildings generally do not front these corridors. TCC believes the arterial road corridors, including ‘no building frontage’ is part of the Tuggeranong Character and should be preserved. Encroachment into the floodways to develop Urban Boulevards is not appropriate, especially along Athllon Drive, which is a major arterial connection to Tuggeranong. Given the prediction of an increase of extreme climate events, reducing any floodway capacity is false economy and could adversely affect community safety.

The healthy waterway strategy which is included in the blue green strategy will require the floodway corridor to implement future improvements. Reduction of the floodway will limit the options for improvement of water quality in Lake Tuggeranong.

Future investigation of the appropriate road type for all Tuggeranong’s major roads, using the Movement and Place approach, needs to be carried out, with full community consultation and engagement, before any significant change in road type is adopted.

Local Knowledge

Several potential errors have been identified in the various plans as follows.

Tuggeranong currently has two rapid transport routes, R4 and R5. The R4 currently terminates at Tuggeranong Town Centre interchange while various plans show it continuing south to Lanyon Market Place via Drakeford Drive. Clarification of the existing and proposed Rapid routes on the plans is needed.



While there is a comment about rapid transport from the Chisholm Group Centre there is no mention of rapid transport or improved connections to the Kambah area. Kambah is the largest suburb in the ACT and substantial growth is proposed in Kambah and the Group Centre. An effective rapid transport system to this suburb needs to be investigated in the short term.

All Rapid Transport Routes from Tuggeranong both existing and proposed from Kambah and Chisholm need to connect Tuggeranong to the City Centre for efficient and convenient travel.

The path network shown on various plans and particularly Fig. 32, *blue-green network*, do not seem to match the network as shown in the *ACT Transport Strategy 2020* and the *Active Travel Practitioners Toolbox* (activeinfrastructure.net.au). TCC is concerned that there is not consistency with other Government Strategies. There also appears to be some inaccuracies in Fig. 32 and other plans. A marked up copy of Fig. 32 is appended with comments.

An off-road path from Chisholm, via the Monaro Highway linking Chisholm to the City as well as Hume and Fyshwick is an Active Travel link that is important for Tuggeranong. A feasibility study has been undertaken by the ACT Government and provision for the path is to be provided in the proposed upgrades to the Monaro Highway. This path should be identified in Tuggeranong and other District Strategies.

Tuggeranong experiences an inversion layer in the atmosphere which is of concern for air pollution for residential areas. Any proposals for the Possible Change Area identified for Hume and the East Canberra District Strategy needs to take the air quality in the Tuggeranong District into account.

Heritage

Tuggeranong Homestead is a nationally significant heritage facility; however, it is included in the Key Sites and Change area at Calwell Group Centre. Residential Development in the Homestead and surrounding open space is not appropriate and definitely should not be considered as a change area.

Recommendations

TCC offers the following Recommendations.

- Maintain a high level of resourcing to finalise all documents and ensure the supporting documents have strong links to the Territory Plan and cannot be ignored by proponents of development.
- That a modest potential growth of the Tuggeranong District be included in future planning modelling.
- Fig. 36, *Tuggeranong – Sustainable neighbourhoods*, be amended to reflect that housing types have not been determined and reinforce that further detailed analysis will be carried out, with full community consultation and engagement, to determine the appropriate development and growth for the Tuggeranong District. i.e. no high rise on unsuitable places like all along Athllon Drive.



- Update the Tuggeranong District Strategy within one year with community consultation and engagement.
- Investigation of Tuggeranong's major road network be carried out, with full community consultation and engagement, using the methods outlined in the Transport Strategy of Movement and Place and Vision Zero to provide an effective road network for all transport types including the significant private car trips, which will be generated in Tuggeranong into the future.
- Investigate improved public transport connections to Kambah and Chisholm including Rapid Transport options.
- The Tuggeranong Homestead and surrounds be removed from a Key Change Area and retained as a significant heritage facility.
- Investigate opportunities for locally based work such as hot desk facilities for ACT public servants to reduce commuting trips to other Centres.
- Amend Fig 32, *Tuggeranong – Blue-green network*, to show intended path system accurately.

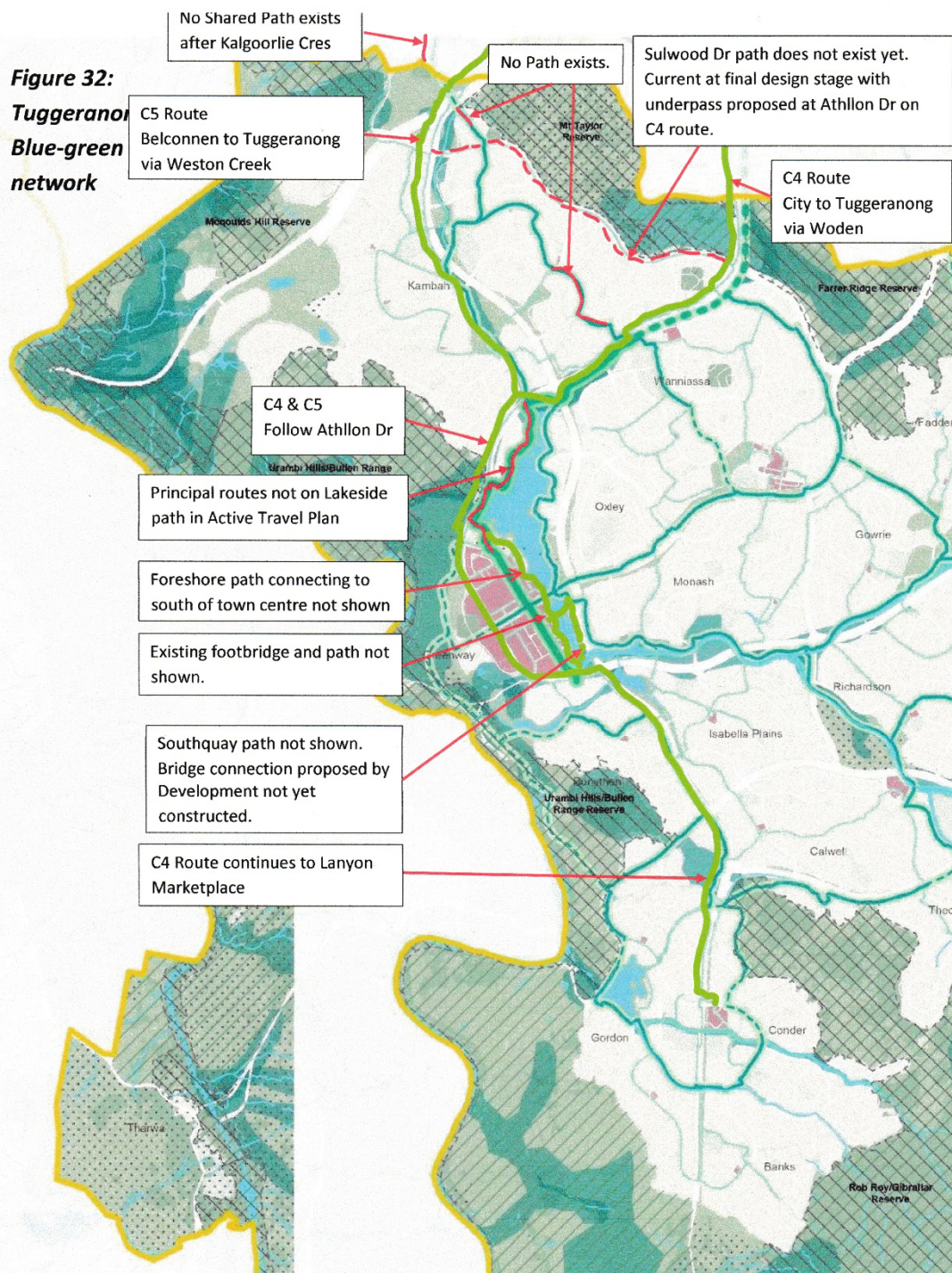
TCC is hopeful that the reforms to the planning system will result in the expectations for future planning outcomes for Canberra being achieved, including a transparent and effective community consultation and engagement process.

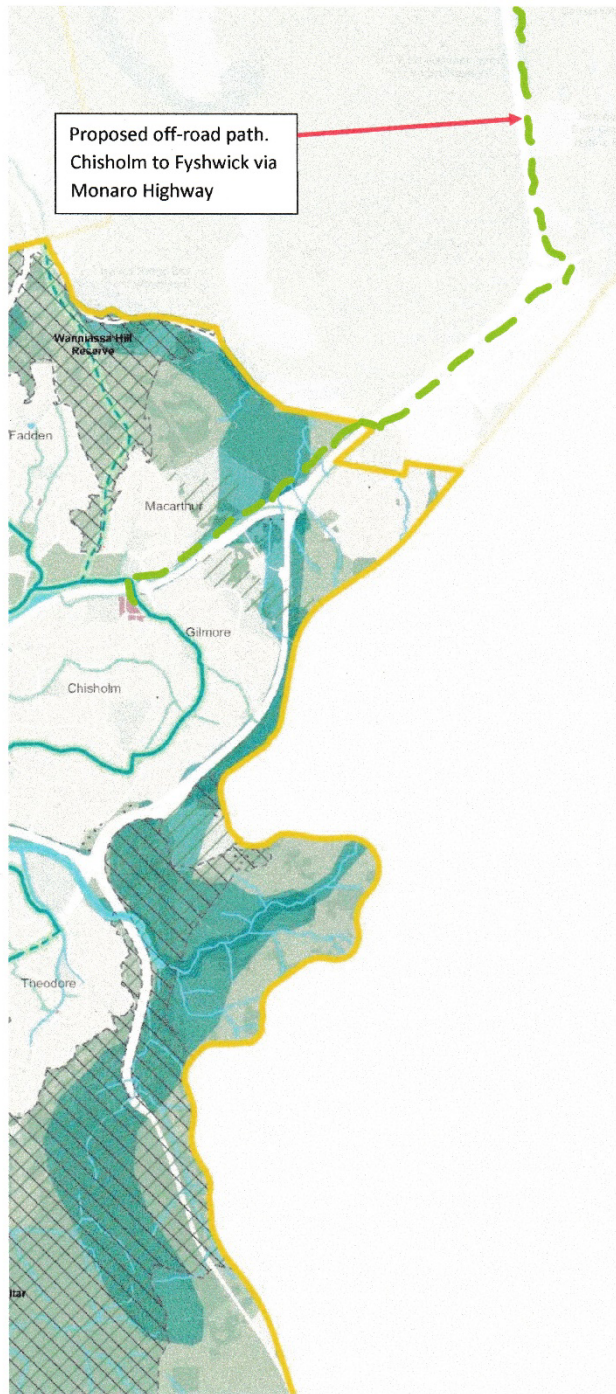
We look forward to the release of the updated Documents with a feedback report and register of submissions.

Thank you for the opportunity to submit our concerns with the draft Territory Plan and Tuggeranong District Plan.

A handwritten signature in black ink, appearing to read 'Glenys Patulny', is enclosed in a white rectangular box.

Glenys Patulny
President
Tuggeranong Community Council





LEGEND






Note: This is a common legend for all similar district plans and all items listed will appear on this drawing

-  District Boundary
-  Open Space with 5m Contours
-  City/Town/Group/Local Centres
-  Water Bodies
-  Creek Lines

Conservation Connectivity

-  Protected Flora and Fauna
-  Potential Priority Connectivity Areas
-  Riparian Corridors
-  Heritage
-  Potential Habitat Area
-  Conservation Area
-  Nature Reserve

Blue Green Network

- Existing Connections
 -  Primary
 -  Secondary
 -  Tertiary
- Possible Future Connections
 -  Primary
 -  Secondary

Scale at A4 1:50000

