



SUBMISSION FOR ACT PLANNING DRAFT DISTRICT STRATEGIES AND DRAFT TERRITORY PLAN

Dear Minister Mick Gentleman MLA,

On behalf of the members of the Landscape Architecture community, the Australian Institute of Landscape Architects (AILA) ACT broadly supports the intentions and rhetoric of the Draft Territory Plan and District Strategies. The AILA champions quality design for public open spaces, stronger communities, and greater environmental stewardship. We provide our 3,500+ members with training, recognition, and a community of practice to share knowledge, ideas, and action. Alongside government and allied professions, we work to improve the design, planning and management of the natural and built environment.

AILA ACT commends the ACT Government for the review and reform of the Planning System and their seeking to give clarity and a 'line of sight' between policy, development controls, implementation, and city management. We appreciate the need to deliver the vision for a well-designed resilient city in a changing climate, adapting and inspiring an array of outcomes. We also believe that as the nations capital there is great opportunity to lead with considered planning outcomes and vision that will deliver this outcome.

AILA ACT has continually expressed its willingness to engage with the Environment, Planning and Sustainable Development Directorate (EPSDD) in the process of review and reform, especially regarding 'testing' the mechanics of a revised system. Due to our industry representatives being inundated with consultation on many planning matters we have provided a concise response and hope to provide further detail in future through open dialogue and proactive engagement.

This submission aims to respond to key issues and concerns raised from the Draft documents and how they will pertain to delivery and sustainability of the 'Bush Capital,' the policies, and strategies to retaining and managing what is valued, as well as how these will be determined and measured. AILA ACT reiterates the Act and new object to achieve liveability and highlight the need to meet the well being indicators for the ACT and a whole living system approach to obtain balance between natural and built environs required for a well-designed city.

AILA ACT are appreciative of the ACT Government's investment into the review process and are happy to contribute further to discussions and provide valuable input as needed. We believe that with broader industry involvement during policy formation, we can achieve better understanding and support in the delivery of the desired outcomes. Thank you again for inviting this feedback, we look forward to further opportunities to work with you.

Regards,

A handwritten signature in black ink, appearing to read 'Cia Flannery', written in a cursive style.

Cia.Flannery
AILA ACT President



Draft District Strategy

As stipulated in these documents the intent of the District Strategy Plans is to provide themes, direction, and vision for the individual districts. This is a view that enthused our members. The potential to prepare a strong vision for our city, and directly relate the macro planning to the micro scale with a hierarchy of centres that varied and adapted in character and amenity was to be commended.

Whilst the rhetoric and aims were supported the deliverables are disappointing. AILA feel that there is no clear vision or distinction of theming between the districts, and there is no clarity of how these areas will ultimately look and feel like. How will performance and desired design outcomes be gauged against the presented drivers and targets?

As professional designers implementing and interpreting these documents, we are concerned that based on the information provided we would be unable to confidently advise and consult to consultants, developer, client what is intended for their site.

The ambiguity of language – whilst prescriptive, allows for misinterpretation and needs to be more didactic. If the ACT Government through this process is intending to enhance community benefit and encourage innovative outcomes they need to ensure their vision is clear, that the quantity, quality is clear and ‘taste’ is left to the individual’s interpretation. Likewise, if the intent is outcome focused, we remain unclear as to the assessment process of how innovative ideas presented will be reviewed and what markers they will be assessed against.

As stipulated in our submission on the Draft Planning Reform, the Design Review Panel needs to carry more leverage in the approval process, and consist of all professions (Planner, Engineer, Architect, Landscape Architect, Cultural Consultant) as a base to their structure. This will allow for a less ambiguous and more constructive technical review of projects that are ‘out of the box’ and realistically place our city and living options into a category of innovation and opportunity.

Innovation needs to be encouraged and can thrive within a strong and clear base of directives and vision objectives. In some cases the documents are too prescriptive so as not to stunt innovation, or too ambiguous and lack clarity. For example: -

Driver 4 Sustainable Neighbourhoods

Targets: Expand Walkable access to shops and services; More inclusive and fair communities

This driver is generic in its intent. What is meant by sustainable? Is it economically assessed? Environmentally based? Socially based?

‘Residential development is of a height and density appropriate to neighbourhood characteristics? Does this imply future neighbourhood characteristics? Past characteristics? Current characteristics? How would one’s interpretation and subjectivity of what is ‘characteristic’ and ‘appropriate’ be assessed, approved, or disapproved?



‘Expand walkable access to shops and services’ who is to provide this? Isn’t it the government’s responsibility to provide infrastructure and future land banking to accommodate this vision? How is this assessed and factored into urban design and site planning if the site is disconnected or not logically placed in relation to these amenities?

‘More inclusive and fair communities’ what examples can be referred to in determining what this looks like or means, so that we can advise and design with clarity and direction?

As an example of stunting innovation and potential of creating a more eclectic and inclusive city, why is the area of Fyshwick not free to explore mixed use residential? Many cities have proven how this diversity in living and working spaces can activate urban areas and provide vibrant architectural and landscape opportunities.

We would hope that there has been consultation and collaboration between all relevant departments and utilities to ensure the support for the intended Drivers and targets in your documents. If not, then as an example, ‘minimise vehicle use, and parking reductions in new developments’ will be difficult to achieve if Transport Canberra and City Services (TCCs) do not reflect this vision in their standards and specifications. How would a design that meets the targets but fails TCCs requirements be reviewed? Assessed? Supported?

Whilst we applaud the inclusion of macro mapping of our city and territory, we have the following points of concern:

- Whilst we commend the mapping of green- blue corridors etc within the document’s borders, the scale and relevance to the individual districts is non-existent or unclear?
- The scale and graphic of the District Strategy Plans and layers are difficult to follow.
- Why is the entire ACT not mapped and planned for? We note that areas identified in ‘The Canberra Spatial Plan’ 30-year projections clearly identify areas for future population growth and expansion that are not captured in the districts presented. Why has this occurred? Why are we not planning for our future proactively?
- What is the border of the study area if it’s not the territory’s border?
- Why are the borders where they are between districts?
- When is the ACT/ NSW border looking to alter wouldn’t this have been a wonderful opportunity to plan for and incorporate expansion of our city efficiently and sustainably?
- Unclear as to the relevance of the district borders as the vision is uniform and thus in population forecasts presented, as has the opportunity to assess each district effectively to ensure a meaningful vision that is measurable and clear in direction.
- How has open space been mapped and assessed on the district level to ascertain the environmental, social, cultural, and sustainable roles that they ‘benefit’? where are more areas required? Does the density affect the scale and location of some of these spaces?
- Does the landscape/ ecology, cultural vibrancy, social equity change between the districts and thus how on the macro scale are land use, transport altered if at all?
- Where are there culturally or heritage significant sites within the districts and how are they integrated?



As an overall, the documents whilst large are repetitive across the districts, with only a small portion relating directly to the individual districts. The documents are difficult to follow and do not identify a clear vision to confidently allow for an outcomes-based planning solution of certainty and innovation.

Of note, once the technical specifications are available, we will provide a more comprehensive response as they need to be read in conjunction with the district strategies in order to review effectively.

Draft Territory Plan

We are unable to provide a conducive response to The Draft Territory Plan due to the incomplete and unavailable supporting design guide documentation. In any case we provide the following points for consideration and further consultation and discussion: -

- What is our Vision for the city, what will it look and feel like?
- We again refer to the 'Bush Capital' and are concerned as to where this has been adequately acknowledged and given priority beyond the peripheral existing native landscape that borders our urban footprint.
- What and how are our canopy targets being captured in future planning? Where is open space required to provide amenity and reflecting of projected population growth and density changes to our population?
- Have other options of crown leases been explored within key areas of our city in order to ensure the vision of connectivity, density, employment, liveability, population are achievable?
- Isn't the intent to create a series of themes and character across our city? Is this reflected in the revised plan? For example, is the 'Architectural Style' the same in heritage areas to greenfield areas? Should it be?
- Have any key performance targets been set for, percentages of tree canopy? high quality design? energy performance? Heat island temperatures? Water re-use? If there were then you could identify indicators and measure their success. This would then provide certainty and give the community confidence that developers need to meet a base level, and that we are monitoring these changes and their success accordingly.