
Submission on the Inner South District Strategy

Greater Canberra Inc, 3 March 2023



Contents

About Greater Canberra	3
Involvement in the Missing Middle Canberra coalition	3
Better District Strategies	3
Summary of recommendations	4
Medium density in the Inner South: the importance of missing middle universal zoning reforms	5
Light Rail Stage 2B Corridor: an ambitious approach	5
Fyshwick: embracing a mixed-use future	7
Revamped streetscape and pedestrian activation	8
Improved public transport and active transport	9
Long-term transition to non-industrial zoning	9
Accelerating brownfield redevelopment	10

About Greater Canberra

Greater Canberra is a community organisation that advocates for a more liveable, sustainable and affordable Canberra. We believe that forward-thinking urban planning and the encouragement of connected medium density communities is vital to ensure that future Canberrans can enjoy social and economic equality and a high quality of life.

Our members come from all over Canberra, and from a variety of backgrounds - both renters and homeowners, from different stages of life, different levels of wealth, and different occupational and professional backgrounds.

This submission was drafted by Inner South residents Howard Maclean and Andrew Donnellan, with the assistance of Inner North resident Aymon Wuolanne. Questions on the submission can be sent to greatercanberra@gmail.com.

Involvement in the Missing Middle Canberra coalition

Greater Canberra is a signatory and strong supporter of the [Missing Middle Canberra](#) open letter, which draws together a range of Canberra organisations to support sensible planning reform. The letter notes that Canberra currently faces a dual housing crisis: an affordability crisis, which is exacerbated by a severe shortage of both private and social housing, especially in our most in-demand suburbs; and a climate crisis, which is exacerbated by our current sprawling suburban form, which leads to increased greenfield development and increased transport emissions.

We, along with our co-signatories, have drafted this letter due to our deep concern that Canberra's current planning policies severely stifle the development of medium density housing, and so are deeply inadequate to meet the demands of these crises. The letter calls for a number of universal zoning policy changes to be implemented as part of the new Territory Plan, which we recommend the ACT Government consider in full. The proposed reforms would make a significant impact to our city's ability to tackle our housing and climate crises, and should be implemented as a priority, and integrated into the assessments conducted as part of this and other District Strategies.

Better District Strategies

In general, the District Strategies lack sufficient detail or explanation of their goals to provide guidance on the future of the areas they are intended to design.

The maps detail multiple areas of potential housing growth but provide no clear timeframes on when the proposed future investigation areas will be developed or how the additional dwelling will be included. Nor do they provide any guidance on what process will be involved in investigating these areas and what the criteria to determine their suitability will be. Without

this required detail the District Strategies add little value to the Territory Plan and are merely commitments to plan for further plans in future.

We are further strongly concerned around the disparity between the relatively low number of dwellings projected as being necessary in the district strategies, and the strong population growth the ACT has seen over the previous several years. Notably, the annual rate of dwellings being planned for across the ACT by 2063, if achieved, would represent a halving of the current rate of annual dwelling growth in the ACT. We note that there are strong reasons to plan for more rather than less population growth given the high costs in terms of rising rents, displacement, and environmental degradation if our planning rules don't properly accommodate the number of homes necessary within our existing urban area.

Summary of recommendations

1. **Medium-density housing:** Embrace the potential of widespread medium-density housing within the Inner South, as envisaged by the Missing Middle Canberra campaign.
2. **Light Rail Stage 2B:** Pursue an ambitious approach to the Light Rail Stage 2B corridor:
 - a. The Stage 2B Future Investigation Area should be expanded to encompass Yarralumla and Deakin shops and the immediate surrounding blocks.
 - b. Brownfield housing redevelopments along this route such as the Yarralumla Brickworks should be reprioritised, and an appropriately high level of housing delivery pursued.
 - c. A similar scale of density as exists along the Northbourne Avenue corridor should be pursued, with a graduated decrease of density further away from the corridor.
 - d. Long term planning to rehabilitate Adelaide Avenue into an urban boulevard rather than a limited access urban freeway should begin, to be facilitated as part of Stage 2B and beyond. With the maturity of Canberra's urban orbital freeway network, Adelaide Avenue is no longer needed for high speed inter-district travel.
 - e. Strong investment into community facilities, parks, and local centre revitalisation should accompany housing creation along the corridor.
3. **Fyshwick:** Encourage a long-term transition towards a mixed-use Fishwick, along the lines of the recommendations of the Eastwick Greenline proposal.
 - a. Invest in making Fishwick a more walkable and accessible suburb.
 - b. Prepare for future Light Rail service to Fishwick, as well as improved bus services.
 - c. Prepare for a long-term transition away from industrial zoning to encourage other commercial uses.
4. **Brownfields redevelopment:** Prioritise any changes required to expedite the development of Inner South brownfields precincts.

Medium density in the Inner South: the importance of missing middle universal zoning reforms

Greater Canberra is strongly supportive of Missing Middle Canberra's platform of reforms to RZ1, RZ2 and CZ4 throughout Canberra, but notes that these reforms are particularly important for the Inner South.

With the largest average block size of any District in Canberra (932.4 square metres), a greater percentage of blocks can support medium density infill in the Inner South than everywhere else. This is not a threat to the character of our district, but an opportunity to provide homes for tens of thousands of Canberrans, particularly young families currently displaced out of the Inner South due to the exorbitant housing prices imposed by exclusionary RZ1 zoning.

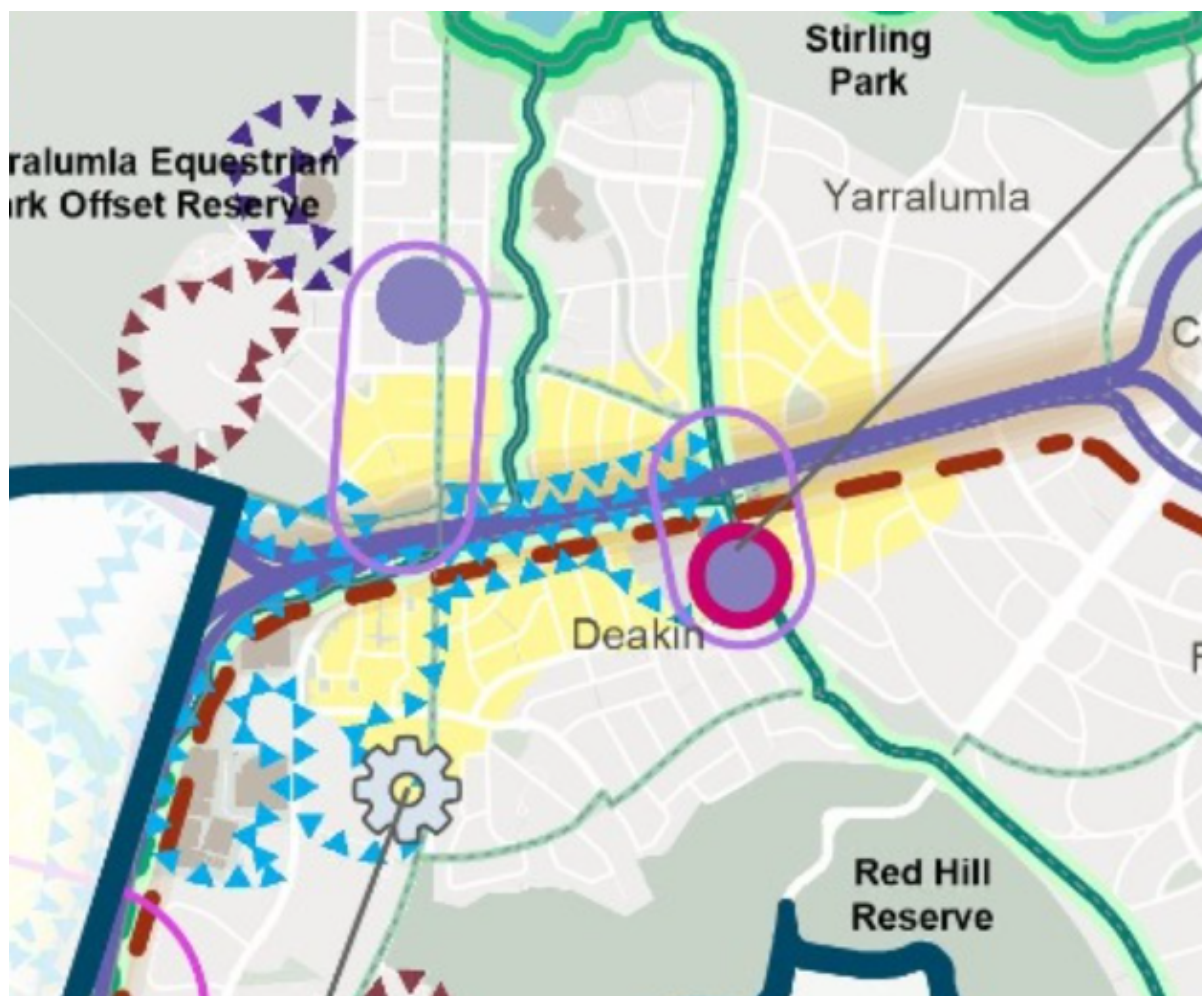
This can be done while maintaining the two storey streetscape of our current RZ1 areas, and maintaining the Inner South's excellent tree canopy. We have the opportunity to revitalise our local centres (which the draft District Strategy identifies as a priority) by altering CZ4 to more easily include above ground residential, to cross subsidise the generation of new commercial spaces at ground level.

Much of the Inner South's infrastructure was designed for larger households with more young children than the RZ1 zoning of our suburbs can currently support, given smaller household sizes, and the fact that the Inner South detached house market is prohibitive to nearly all Canberrans with young children. Over the past few decades, this resulted in schools shutting, and playgrounds and parks having less children than before.

By zoning for family friendly medium density housing in the Inner South, we give young families the opportunity to live in the Inner South, and create a District that is less of a demographic and socio-economic outlier compared to Canberra as a whole.

Light Rail Stage 2B Corridor: an ambitious approach

The current draft strategy anticipates a "future investigation area" along the future Stage 2B corridor in Deakin and Yarralumla. This area is some of the best connected potential housing in the city - close to the nexus of the future full light rail network, within walking distance of major employers in the Parliamentary Triangle, with some of Canberra's best parks and community amenities in these suburbs along with established schools.



The Government will likely receive many submissions from established, current residents of these suburbs protesting the potential for infill housing along this route.

It will likely not receive as many submissions from the future residents and Canberrans who will benefit from the creation of housing along the Stage 2B corridor. The reasons vary - most of them are not alive yet, most of those that are alive do not know they will live in the housing along this corridor, and in any case younger Canberrans are largely unaware of and struggle to engage in planning processes.

This may be contrasted against the established residents of these suburbs, which have some of Canberra's oldest (by median age) and wealthiest residents. The asymmetry of access, power, and knowledge to engage in this process will produce an imbalance of views to this consultation, despite the fact that very few people currently live along this corridor - about 6,200 at the 2021 census.

Greater Canberra was founded in part to advocate for future and younger Canberrans that for too long have been disenfranchised by our planning system. To best protect the interests of those Canberrans - to reduce emissions, to forestall greenfield sprawl, to improve average walkability, public transport access and reduce housing costs, the ACT Government must pursue an ambitious housing infill agenda along the Stage 2B route.

Specifically:

1. The Stage 2B Future Investigation Area should be expanded to encompass Yarralumla and Deakin shops and the immediate surrounding blocks.
2. Brownfield housing redevelopments along this route such as the Yarralumla Brickworks should be reprioritised, and an appropriately high level of housing delivery pursued.
3. A similar scale of density as exists along the Northbourne Avenue corridor should be pursued, with a graduated decrease of density further away from the corridor.
4. Long term planning to rehabilitate Adelaide Avenue into an urban boulevard rather than a limited access urban freeway should begin, to be facilitated as part of Stage 2B and beyond. With the maturity of Canberra's urban orbital freeway network, Adelaide Avenue is no longer needed for high speed inter-district travel.
5. Strong investment into community facilities, parks, and local centre revitalisation should accompany housing creation along the corridor.

The Stage 2B corridor is an excellent opportunity to create homes for thousands of Canberrans in well located, walkable, high amenity neighbourhoods with excellent access to amenities, services and green space.

The ACT Government should not sacrifice the interests of every succeeding generation of Canberrans to appease the aesthetic and class sensibilities of a small number of incumbents.

Fyshwick: embracing a mixed-use future

The entire modern history of Fyshwick is Canberra's planners attempting to force the existence of an Industrial area via restrictive zoning codes, and higher value commercial, retail, and hospitality uses finding gaps in those codes to establish themselves. This was noted as far back as the [1984 NCDC Metropolitan Plan](#):

The emergence of Fyshwick as a retail centre was not intended. It grew in response to weak lease purpose clauses, and the non-enforcement of purpose clauses. In 1980, it attracted about 11 per cent of Canberra's retail expenditure, gaining expenditure from all districts in response to the retail opportunities available there.

At September 1982, 65 per cent of Fyshwick's floorspace was in the clothing and furniture, and household appliance categories, as compared to the total Canberra proportion of 38.5 per cent. Fyshwick had almost 35 per cent of Canberra's clothing and furniture sales floorspace and 30 per cent of the household appliance sales floorspace.

These activities generally require single-level and low-rent floorspace. From a metropolitan planning viewpoint, the location of such floorspace at Fyshwick is not desirable. It is not central to the current and future population distribution and has led to a higher level of retail floorspace in Canberra than was intended. There is a demand for low-rent space for the types of retail activities carried out in Fyshwick and the demand should be met at locations more central to the established population.¹

¹ Page 63.

Fyshwick, in its modern form, is not really an industrial area. It is dominated by retail, particularly big box retail, and supporting commercial and hospitality venues. What industrial uses remain will be increasingly displaced over the coming decades by higher value retail, commercial and hospitality uses, as has been the pattern for decades and as will accelerate as Canberra continues to grow.

This is economic gravity. Fyshwick is a stone's throw away from the Parliamentary Triangle. It will not, and should not, remain an industrial area, and ever more onerous and artificial zoning controls will be required to keep it so.

Rather, Canberra should embrace the opportunity to pursue a future for Fyshwick that embraces its potential as a mixed use employment and services hub, building upon its existing strengths as one of Canberra's largest economic centres to cement its position as the economic centre of gravity in the Inner South-Queanbeyan region. This is particularly important as East Lake, Dairy Road and other residential areas begin to adjoin Fyshwick.

The Fyshwick Business Association has already laid out a vision of how this might be achieved in its [Eastwick Greenline Light Rail and Active Travel Corridor Concept](#). The ACT Government needs to embrace the opportunity and the challenge of transforming the public environment of Fyshwick to reflect the uses that the area *actually* provides and will continue to provide.

With this in mind, the District Strategy's current approach to Fyshwick is alarming and misguided. The District Strategy at multiple points makes references to "protect[ing] Fyshwick] from encroaching commercial, residential and retail uses that could be accommodated in centres", and further that:

Fyshwick remains an important industrial area for both the Inner South and the whole ACT and region. Despite pressure for conventional retail and commercial development, the industrial and urban services functions in Fyshwick will be retained and prioritised in land use decision making for the precinct and surrounds. This will make sure that as Canberra grows it still has access to a central precinct with industrial and urban services land uses. This may require reconsideration of the planning controls and land uses that apply under the current zoning

In attempting to preserve an imaginary industrial Fyshwick which hasn't existed for decades, the District Strategies abandon any responsibility in accommodating the Fyshwick that actually exists. Rather than attempting to find changes to zoning rules to force out thriving Fyshwick cafes, bookshops and other uses, this District Strategy should begin the long and gradual process of transitioning Fyshwick from industrial zoning.

Revamped streetscape and pedestrian activation

Fyshwick is by far the most actively hostile of Canberra's suburbs to be a pedestrian in.

- Pedestrian infrastructure is non-existent

- Roads are wide with high speed traffic and few crossings
- Fyshwick has the lowest canopy coverage of any suburb in Canberra Central at 9.2%.
- Fyshwick has by far the most acute heat island effect of any area of the Inner South outside broadacre areas.
- The street layout is actively hostile to pedestrian navigation.
- Public spaces and greenspace is largely non-existent or has extremely little investment and activation

None of this would be as much of an issue if Fyshwick was still predominantly an industrial area, with low overall employment and few customers. However, as it currently stands, Fyshwick is a retail and hospitality area. 20% of Canberrans visit Fyshwick weekly. Doing so is unpleasant even with a car, and doing so without a car is awful.

Investment should be made to make Fyshwick a more pleasant, walkable and accessible suburb to better reflect its modern retail and services role.

Improved public transport and active transport

Although Fyshwick is served by the R2 along its edge through to Canberra Outlet, the suburb itself is served by one non-rapid route, the 56. The 56 has been described as the “[hellish bus of the damned](#)” by the Public Transport Association of Canberra, noted for its low frequency, limited hours of operation, and extremely convoluted route.

In the long run, Fyshwick would be best served by a light rail line through to Queanbeyan. The District Strategy should reflect the potential for this line to be built in the future. This central spine must be supplemented by higher frequency and more usable supplementary bus services, particularly if the future light rail alignment follows the current Canberra Avenue route of the R2 rather than the Eastwick Greenline proposed alignment along the current rail corridor.

Long-term transition to non-industrial zoning

With these investments that will better serve Fyshwick’s current role as a retail, hospitality and customer services hub, transition planning must be made for the gradual transition from the current mixed-use precinct that still has industrial uses, to a employment centre where ongoing industrial uses are incompatible with other land uses.

As outlined in its current District Strategy, the ACT Government should examine the creation of new industrial areas, and facilitate the movement of industrial businesses to these new areas from Fyshwick.

These new industrial areas do not need to necessarily be within the ACT. The ACT Government should consider working more closely with the NSW Government and adjoining LGAs in the capital region about potential industrial sites that can provide urban services and industrial uses for the region.

Accelerating brownfield redevelopment

The Inner South has many brownfield redevelopment sites that have been stuck in continuous planning for multiple decades, including:

- Kingston Arts Precinct
- East Lake
- Yarralumla Brickworks

While previous brownfields redevelopment efforts in the Inner South (e.g. the completed parts of Kingston Foreshore) have eventually delivered some excellent results, it is clear that these brownfields projects have historically taken far, far too long to develop.

If current and future brownfields precincts continue to follow this trend, they cannot be relied upon to deliver the housing that Canberrans need or to fulfil the Government's commitments on housing in a timely fashion. Brownfields projects ought to be delivered much faster than greenfields, and the present situation where a single precinct can take several decades to complete is utterly unacceptable.

The District Strategy must emphasise the need for Inner South brownfields projects to be pursued vigorously and prioritised when it comes to any required rezonings or other planning changes.