

## Draft Amendment – 102 Hume Circle Precinct

### Index of Submissions

*as at 10 April 2026*

This document contains all submissions received during the public consultation period where the National Capital Authority has been granted permission to make the submission public. Some submissions may read as disjointed / out of context, as personal and identifying details have been removed as requested.

The highlighted submissions below have been added to this document since it was first published on 16 March 2026.

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I'd like to say that the draft proposal has significant benefits to the community.

My only concern is that it appears there will still be a roundabout. Given the traffic volumes, and the speed drivers still enter roundabouts, there persists risks to road users. It would be much safer, and fairer to road users, to install traffic lights.

Mike McCartney

Calling it the Hume Circle Precinct is confusing when it is nowhere near the suburb of Hume.

I suggest the name should be “Hume Place Precinct”.

To whom it may concern,

I'm writing with regards to DA102.

I am concerned that the proposal is too high in density. 15 storey buildings will be out of character for the area and stand out significantly. The area is also too small meaning the buildings would have to be built close to the road and without garden space. This would create a very cramped feeling for the area.

Wentworth Ave is not capable of supporting such an increase in population. The road is already overly busy during peak hour. This proposal will exacerbate existing traffic issues.

I would prefer to see this proposal limited to 3 or 4 storey residential blocks, with significant garden area mandated. With more and more people living in apartments due to the cost of living (including families), we need to ensure all new apartment blocks are built with decent sized garden area.

Dear National Capital Authority Planning Team,

I am writing in response to the current consultation regarding the Eastern Gateway planning proposal around the Hume Circle precinct.

While [46 McMillan Crescent, Narrabundah](#) is not presently included within the draft amendment area, I believe this site warrants consideration as part of the broader urban intensification strategy being proposed for the Eastern Gateway.

The consultation material indicates that the Authority is seeking to establish a higher density, well-designed urban node that reinforces Canberra's eastern entry and supports housing supply in proximity to major transport corridors. In this context, [46 McMillan Crescent](#) sits as a logical continuation of this emerging gateway precinct rather than as an isolated suburban parcel.

Maintaining existing low height limits at this location risks creating an artificial edge to the precinct that undermines the strategic intent of the amendment. A modest increase in permissible building height at this site would enable a more coherent urban transition between Hume Circle and the surrounding Narrabundah area, while still allowing for context-sensitive design outcomes.

I respectfully request that the Authority consider reviewing the applicable height limit at [46 McMillan Crescent](#) as part of the Eastern Gateway amendment process, or alternatively advise on the appropriate pathway for seeking such a review. I would welcome the opportunity to provide any further information required, including preliminary design concepts or technical justification.

Thank you for your consideration and I look forward to your guidance.

Kind regards,

Sam Bulless

Dear NCA

My personal comments of the draft amendment DA102 are as follows:

1. Request that the amendment specifically values and legibly emphasises the pedestrian/cycleway open space linkages between Griffith and Manuka community centres & Narrabundah community centre & Fyshwick (community centre including markets precinct) & Kingston community centre and foreshore precinct AND Lake Burley Griffin (for instance leveraging via the McMillan Circuit corridor). The point is to reflect that people (including school children and seniors) live and walk/cycle locally and despite any proposed higher density development, people can do so safely and largely without having to run across busy major arterial roads (ie there need to be pedestrian bridges or underpasses). It is not simply a Canberra avenue/wentworth avenue thoroughfare.
2. Please also ensure this same pedestrian/cycleway/greenspace landscape corridor connections also properly and safely connects (ie separated from vehicular transport) with the safely completed entire lake burley griffin circuit. The lake burley griffin circuit is unreasonably broken at the Kingston Foreshore precinct (cycleway is combined there with cars) and this super connection would be an opportunity to correct this urban planning flaw.
3. Would a future public transport link between the railway and the airport need to be accommodated in Hume circle development?

Thank you for the opportunity to comment. I look forward to hearing more about progress of this draft amendment.

Kind regards

Thea Huber

Dear National Capital Authority,

I am writing to formally submit my support for the proposed amendment as outlined in the Hume Circle Background Paper (January 2026). As a resident of Narrabundah, a neighboring suburb, I believe this plan represents a significant opportunity to bring cultural, economic, and heritage benefits to our local area.

While I am strongly in favor of the overall direction of the plan, I would like to offer the following suggestions to ensure the precinct reaches its full potential:

- **Retail and Commercial Incorporation:** I recommend considering the inclusion of a greater supermarket or expanded shopping options adjacent to the Fyshwick Markets. This area is already a highly convenient and established shopping location for residents; augmenting it would better serve the growing community and enhance the economic viability of the precinct.
- **Connectivity to Dairy Road:** Establishing a strong link between this precinct and Dairy Road would be highly beneficial. This connection would significantly enhance active travel and recreation options, creating a more integrated and accessible precinct for everyone.
- **Active Travel and Safety Improvements:** Currently, travel for pedestrians and cyclists toward Stuart Avenue and the East Lake precinct is quite hazardous. Given the proximity of St Edmund's College and St Clare's College, it is essential that the plan includes robust active travel arrangements and safe passage. Improving these routes is vital for the safety of students and residents alike.

Thank you for the opportunity to provide feedback on this important development. I look forward to seeing the positive impact this plan will have on our community.

Sincerely,

Hamish Holewa

## Submission re Draft Amendment 102: Hume Circle Precinct

I am voicing my objection to the proposed Draft Amendment 102 (DA102) on several grounds.

Firstly, I do not support the National Capital Authority appropriating as a 'designated area,' the parcel of land that is bound by Sturt Ave, Canberra Ave and McMillan Crescent and borders the SE quadrant of Hume Circle. This parcel incorporates the current and existing residential complexes, Staffordshire Terrace, Avalon Apartments and Canberra Short and Long Term Stay Apartments.

As a freehold owner/occupier of a unit that faces directly onto the SE quadrant of Hume Circle, I am concerned that the proposed amendment, even though it might not be enacted for some time into the future (even beyond the 10–15-year scope mentioned in the Background Paper) will negatively impact the resale value of my unit with immediate effect. A lower resale value or difficulty in selling due to the uncertainty created by Draft Amendment 102 would materially affect my financial situation.

As a retired person and Aged Pensioner, my apartment is my primary financial asset. If Draft Amendment 102 is enacted, all property values at Staffordshire Terrace would diminish as these units would no longer be attractive to future owner /occupiers /investors due to NCA mandated proposed building plans for 8, 15 and 3 storey apartments in this section of the Hume Circle precinct. Developers would plan the demolition of current residences and compensation would never equal current (2026) market value.

My second objection is that there is much made in Draft Amendment 102 of being true to the 'Griffin Plan' by creating a radial boundary using MacMillan Crescent. I am sure that Walter Burley Griffin did not envisage 8 and 15 storey apartments as being enhancements to the 'scenic value' of an eastern entry into the national capital. Moreover, having lived on Hume Circle for the past 10 years, my impression is that a large volume of traffic on Canberra Ave flowing into Hume Circle from the east is from Queanbeyan, the dormitory 'suburb' of Canberra. Hume Circle does not greet newcomers and visitors to the national

capital from this direction. It is not of 'national significance' to impress daily NSW commuters who do not choose to live in their national capital.

Similarly, invoking the Griffin Plan to support arguments for creating an axis with Mt Ainslie via a Causeway intersecting with Hume Circle, as drawn in the original Griffin Plan, are spurious and untenable. An axial Causeway could only be a 'sightline' as implementation would cut across the contemporary lake configuration and the protected Jerrabomberra Wetlands. I find the repeated appeal to the 1918 Griffin Plan and the Burley Griffin's initial drawings to be manipulative, using a cultural artefact as a justification for NCA involvement. Indeed, looking at the 1918 drawings, Lake Burley Griffin itself does not accord with the Griffin Plan. The Griffin Plan is not the sacrosanct outline the NCA would have us believe.

The heritage value of some of the buildings in the Hume Circle Precinct is acknowledged in DA102. I would suggest that Staffordshire Terrace UP 1168 should also be considered to have heritage value. Built in 1994, there are only a few examples of this building style remaining in Canberra and should be preserved as part of the history of Canberra's architectural eras. The Staffordshire Terrace complex is in good condition, well maintained and a good candidate for heritage listing.

Thirdly, DA 102 takes planning away from the ACT Government which proposed the East Lake Precinct Plan (ELPP). The scope of the ELPP did not encompass the entire MacMillian Crescent radius as outlined in DA102. I made a submission regarding East Lake precinct, with a focus on preserving and enhancing the recreational and environmental values of the Jerrabomberra Wetlands and adjoining spaces. However, I imagine that the ACT government would be only too willing to cooperate with an NCA proposal for a high-density apartment ghetto in an expanded East Lake precinct, as outlined in DA 102. The revenue generated for the ACT government as a result of DA102 would far exceed their original ELPP ambitions.

Fourthly, of greater concern is that the band of 15 storey apartments in the NE of the Hume Circle precinct would have an environmental impact on the currently undeveloped lands bordering the wetlands. 15 storeys far exceeds current height limits for any apartments in the Kingston foreshore area. The current Causeway residences (home to a low socioeconomic demographic), directly adjacent to the wetlands are also not mentioned in the proposed NCA plans. There would undoubtedly be pressure for high rise development in this

location due to its proximity to the high rise/high density of the NCA designated area. I greatly doubt that any of the apartments built in the Hume Circle Precinct would fall into the low-cost housing and 'affordable' range.

Fifthly, I find no or little detail about the public transport hub suggested by DA 102. No mention is made of the Canberra Railway Station and where it might be located/relocated. Has an assessment been made of projected increased local traffic, congestion, and safety issues? Hume Circle already sees a fair share of traffic accidents that would only be exacerbated by doubling or tripling the local residential population and expanding retail outlets in such a small area.

Lastly, I see no reason why the NCA needs to control the Hume Circle Precinct apart from trying to retro fit the 'Griffin Plan.' I am not convinced that this is a justification for creating an area of 'national significance' on a par with the Parliamentary Triangle that needs NCA oversight. The only real justification provided in DA102 is to create an eastern approach to the national capital with more 'significance'. The vista from Hume Circle does not provide any view to Parliament house for travellers approaching from the east. This only happens at Manuka Circle, about one kilometre further west on Canberra Ave. The only views of Parliament House from the Hume Circle Precinct would be from the top few storeys of 15-storey apartment buildings on Hume Circle. Is it of 'national significance' to ensure 'penthouse views' of Parliament House from the east? I think not.

I see the DA102 proposal as an excuse to create an unsightly apartment ghetto, quite unlike Walter Burley Griffin's original scenic vision. The benefits are gleaned mainly by enlarging ACT Government coffers and the developers who have destroyed the Canberra imagined by the Burley Griffins in 1918. I would most certainly be financially disadvantaged by the DA102 plan.

If more land for housing is needed, I suggest the NCA look to the CSIRO lands in Canberra's north, not a small roundabout in Griffith.

To the Chief Planner, NCA or delegate

**Re: Changes proposed to the National Capital Plan Draft Amendment 102 - Hume Circle Precinct**

I am providing this submission in response to the above proposal as a very concerned owner-occupier of the Staffordshire Terrace Apartment complex (the Complex) at Sturt Ave Griffith.

Consultation Period

In the first instance I wish to express my disappointment with the adequacy of the NCA consultation process for this plan.

Supporting documentation states that the NCA 'seeks an open and transparent draft amendment process'.

A timeframe of release 5 January with submissions closing 3 February, over the Summer holiday period when a majority of people are away or focussed on other matters, and whilst Parliament is in recess, is not supportive of an 'open and transparent' process in my mind. The optics are that the NCA is hoping that the changes will be made without opposition.

I request that the NCA extend the consultation process and engage more fully with the owners of the residential properties who stand to be significantly affected by the proposed changes to the Draft Plan

Personal impact

We have lived in our apartment for 22 years and have recently invested significant capital into fully renovating our kitchen, laundry and bathrooms with a view to retiring and enjoying (hopefully) a further 22 years in our home. We now find ourselves in the position that this may not be possible.

The Complex comprises 105 apartments of varying sizes (1-3 bedrooms) with a diverse population (a mix of ages and nationalities) made up of long-term owners and tenants, in addition to short-term and government tenants. It is a strong community. The Complex is well managed and maintained at both an individual and body corporate level.

It is a classic example of the 'missing middle' that is often spoken of with regards to the Australian housing landscape.

### Redevelopment

I understand the basis of the proposal for the redevelopment of the area, and certainly the redevelopment of the aging industrial infrastructure in the accordance with the Griffin Plan makes perfect sense.

There must, however, be a way to incorporate accommodation such as ours into the new vision without the demolition of our homes. The Complex is attractive and good quality, with many owners having made significant upgrades to their properties over recent years. The Complex will contribute to the diversity in the housing offering (height, bulk and scale), with established community gardens and green spaces and could provide a welcome buffer between the single dwelling housing, the schools and the proposed high-rise accommodation.

### Requests

I am opposed to the amendments as currently drafted and am requesting that the NCA give consideration to:

- 1) extending the consultation timeframe and engaging more fully with residential owners who stand to be severely impacted; and
- 2) ultimately to not including our Complex in the proposal for redevelopment.

Thank you for your time and consideration.

Kind regards

Chief Planner, National Capital Authority, GPO Box 373, Canberra ACT 2601 National Capital Authority

Dear Planning team,

Subject: Submission on Draft Amendment 102 (DA102) – Hume Circle Precinct

I am writing to express my concerns regarding the National Capital Authority's proposal for the Hume Circle precinct (DA102). As highlighted in the Canberra Times article on 21 January, "Quite a radical proposal High-rises proposed for crash-prone roundabout," this plan represents a significant and potentially detrimental change to the character of inner south Canberra.

While I acknowledge the NCA's mandate to develop the national capital, it is imperative that this proposal not be rushed through. A development of this scale requires a comprehensive and rigorous assessment of all its implications before any consideration is given to approval. The current consultation period is insufficient for a proper analysis of such a radical transformation.

The proposal's potential impacts are broad and interconnected, and each must be thoroughly considered:

- **Traffic and Infrastructure:** The proposal's location at a known "crash-prone roundabout" raises immediate and serious questions about traffic safety and congestion. A detailed, independent traffic impact assessment is essential to understand how this high-density development will affect an already strained local road network and public transport capacity.
- **Social and Community Impact:** The introduction of high-rise towers will fundamentally alter the social fabric of the surrounding low-rise, community-oriented suburbs. The impact on local amenities, schools, and public spaces must be evaluated to ensure the community's character is not destroyed.
- **Environmental and Geographical Impact:** The geographical context of Hume Circle is unique. The environmental implications, including overshadowing, wind tunnels, loss of green space, and the urban heat island effect, must be modelled and mitigated, not ignored.
- **Economic and Housing Implications:** The plan appears to focus on creating more unaffordable housing, which will only exacerbate Canberra's housing crisis. There is a demonstrable and urgent need for social and affordable housing. A development of this scale should be leveraged to provide a genuine mix of housing types that cater to a diverse range of incomes, rather than creating luxury apartments that displace long-term residents and contribute to the trend of pushing people out of city centres.

I was informed that a meeting was held on 15th January between the NCA Chief Executive, Ms. Karen Doran, and representatives from the ISCCC, GNCA, KBRG, and ONCC. It is deeply concerning that Ms. Doran refused to extend the consultation period, especially given the community's legitimate and widespread concerns.

I strongly urge the NCA to halt the current process and undertake a far more extensive and transparent review. The proposal, as it stands, requires further thought and a holistic analysis of its impact on the existing community and the future of the best city in the world, Canberra.

When democracy truly thrives, so does humanity.

Sincerely,

*Submitter name withheld*

28 January 2026

29 January 2026

Andrew Smith  
Chief Planner  
National Capital Authority  
GPO Box 373  
Canberra ACT 2601

Cc: Freya O'Brien (City and Environment Directorate)

Dear Mr Smith

## **National Capital Plan Draft Amendment 102 – Hume Circle Precinct**

This letter has been prepared on behalf of Eyre Street Market and the Fyshwick Traders Association regarding the recently advertised Draft Amendment 102 (DA102) to the National Capital Plan (NCP).

We begin with stating that we believe the scope of this change is a welcome evolution of Griffin's legacy, which creates a strong basis for realisation of an improved approach to the Nation's Capital, while also creating opportunities to strengthen the ACT's response to National Urban Policy to build 1.2 million new well-located homes.

While the overall approach for DA102 is supported, we take this opportunity to raise deep concerns with a perceived lack of consideration for the ACT's hierarchy of Centres as it applies to nearby Group and Local Centres identified in the *Territory Plan 2023*. The following sections provide general commentary on the proposal, outline the basis for the Centre's hierarchy, its importance for the vitality of our Group and Local Centres and provides suggested approaches for DA102 which will remedy the omission of Centre's hierarchy related controls.

### **Overall Support for the Proposal**

We strongly support the overall approach for the proposal. As stated in the supporting material, the Griffin's vision for Hume Circle remains unrealised. Policy setting to 'unlock' the subject site provides numerous positives, notwithstanding the evolution of the Griffin's approach to to the Central National Area along Canberra Avenue.

The provision of an urban 'gateway' in this locality presents an opportunity to enhance Hume Circle from its current, somewhat underwhelming, built-form. The current approach is ageing and were it to be revitalised under the current controls, is unlikely to achieve the desired 'sequence of arrival' to the National Capital. Therefore, the proposed enhancement to the built-form addressing the gateway is welcomed.

Coordination with the East Lake Precinct, provides an opportunity to extend the East Lake Place Plan project area. We are of the view that this will provide a strong basis for a large, well-connected, convenient and sustainable precinct.

With consideration of the above, we wish to provide our overall support for DA102, conditional on consideration of the following elements being addressed.

### ACT Hierarchy of Centres

The ACT's Hierarchy of Centres is a planning framework which organises retail, commercial, community and employment functions into a structured sequence of Centres with varying scale, role and catchment:

1. City Centre (Civic)
2. Town Centres (Belconnen, Gungahlin, Tuggeranong and Woden)
3. Group Centres (Locally represented by Kingston and Manuka)
4. Local Centres (Locally represented by Griffith and Narrabundah Shops)

The hierarchy provides for a wide range of services for the Canberra population, progressively offering a broader range of goods and services for the higher order tiers.

The Centres hierarchy system of urban Centres was embedded in the early planning of Canberra. The National Capital Development Commission (NCDC) established in 1958, drove Canberra's post-war expansion and the development of new towns, each with their own town centres. The establishment of Woden (1971), Belconnen (1977) and Tuggeranong (1987) embedded the multi-centre model in Canberra's growth strategy, with Gungahlin (1998) established later and Molonglo more recently.

Group and Local Centres developed from this basis through the NCDC, and later the NCA and Territory Government. These smaller Centres are designed to serve daily and weekly shopping needs.

Overall, the hierarchy was established to support a dispersed urban form of self-contained towns and neighbourhoods with essential services and retail accessible locally. This distribution of retail and commercial activity is intended to provide efficiency, matching retail functions with population catchments, which in turn supports a dispersed urban form. Importantly, this hierarchy also supports the vitality of these Centres, avoiding direct competition and providing certainty to existing businesses.

The Centres hierarchy is reflected in both the NCP, in the *Planning Act 2023* and *Territory Plan 2023*. Within the NCP, the hierarchy is shown in the General Policy Plan and NCOSS at the Town Centre Level. This is further defined under policies for employment locations, defined under 3.5.3 of the NCP, identified as *Activity Centres*.

The *Territory Plan 2023* and its supporting policies embed the Centres hierarchy and regulate retail and commercial development as it relates to each of the Centre tiers. This is controlled through the District and Zoning policies across the ACT and is expressed primarily through assessment requirements. The Commercial Zones Policy applies varying controls to retail and

commercial uses applied to various zonings. In the case of the subject land within Hume Circle the zonings are currently CZ2 – Business Zone and IZ2 – Mixed Use Zone. The subject land is split within the Inner South District Policy between Griffith and Fyshwick which includes controls on retail and commercial uses as follows:

**Fyshwick-** *19. Maximum gross floor area of shop for display and sale of alcohol beverages:*

- a) Fyshwick section 30 block 18 - 1200 m<sup>2</sup>.*
- b) All other locations – 200m<sup>2</sup>*

*20. In the IZ2 zone – the maximum gross floor area per shop is:*

- a) Selling food or a supermarket (except produce market) – 200m<sup>2</sup>*
- b) All other shops (except bulky goods retailing) – 3,000m<sup>2</sup>*

**Griffith-** *37. In the industrial zone the maximum gross floor area of shop is 200m<sup>2</sup>.*

The above controls are well established, having carried over from the previous *Territory Plan 2008*. It is therefore important that these controls are carefully reviewed as part of the changes proposed by DA102. As will be discussed further in later sections, these controls are effectively erased as part of the proposed Draft Amendment, and do not form part of the supporting documentation and rationale provided with DA102.

### East Lake Place Plan

The East Lake Place Plan (the Place Plan) provides a guide to the renewal of the East Lake precinct which encompasses parts of Kingston, Griffith and Fyshwick, and incorporates the Canberra Railway Station, Mildura Street, the Causeway and former landfill areas. Its key focus is to shape future urban renewal, housing, transport, green public spaces and mixed-use development. The Place Plan was developed in response to community input and broader strategic planning policies.

The Place Plan sits within the context of the Inner South District Strategy and ACT Planning Strategy, which identify East Lake as an “area of change” for urban intensification and mixed-use renewal.

Along with its scope for change to the area, the Place Plan clearly supports commercial, and retail functions integrated within the broader mixed-use precincts proposed. Importantly, these retail functions reference everyday retail and artisanal traders as part of the local economy – such as hairdressers, cafes and creative makers. This approach reflects an intention to create a vibrant community where retail supports place activation and local life, not just commuter or destination shopping.

This approach broadly aligns with the ACT Hierarchy of Centres, in so far as it is not proposing a new activity node which would compete directly with the nearby Group and Local Centres in

the area. This is evidenced in the recent rezoning of Kingston – East Lake – The Causeway Area, part of the Inner South Canberra District Policy area, which includes maximum gross floor areas in Assessment requirements as follows:

*77. The maximum gross floor area is:*

- a) Supermarket or shop selling food – 300m<sup>2</sup>*
- b) Office tenancy per lease – 2,000m<sup>2</sup>*
- c) Office per tenancy – 500m<sup>2</sup>*

This demonstrates that the ACT Hierarchy of Centres persists and permeates through the broader design thinking of the local area, and that it should be considered as part of DA102.

### Current Economic Conditions

It is important to note, that the current economic climate has impacted ‘bricks and mortar’ retail in the local area, with several retail and commercial vacancies identified through Kingston and Manuka. Economic downturns and competition with online shopping means that the conditions for our Group and Local Centres are arguably at one of the most challenging times in recent history. This means that any proposed changes to the retail hierarchy must be carefully considered.

A key element of a Group and Local Centre’s eco-system is the provision of ‘anchor’ tenants, which attract primary spending and often result in incidental retail activity to the broader centre. In the case of the Kingston Group Centre, this is in the form of Kingston Supabarn which attracts shoppers from the immediate catchments of Kingston, the foreshore and parts of Griffith. The Kingston Group Centre is approximately 450m from the DA102 – Hume Circle Precinct.

This is also relevant to the Fyshwick Markets which is directly adjacent the Subject Site. While not a Group Centre, the markets provide a broad range of small shops and traders which attracts clientele from all over the ACT. It is important that the potential impacts to existing traders are understood, before rules relating to shops and retail are removed.

This is also relevant to the nearby Local Centres of Narrabundah and Griffith which include local supermarkets, limited by the *Territory Plan 2023* to 1,500m<sup>2</sup> GFA. This aligns with the ACT Hierarchy of Centres by ensuring that the offering for these Local Centres is focussed on everyday retail and neighbourhood convenience.

## DA102 and Potential Impacts to the Centres Hierarchy

DA102 functionally removes any *Territory Plan 2023* controls which are currently in place over the subject area. As mentioned above, this is broadly supported as it will provide an excellent opportunity to revitalise this key gateway location on the Approach to the Central National Area.

Further, we welcome the flexibility and density that the change provides for the area, with the ability for redevelopment to meet the evolving requirements of our City and its population.

With the above said, we are concerned that the change to controls relating to the ACT Hierarchy of Centres goes too far in that it removes any controls relating to retail and commercial functions. If left unchecked and not appropriately coordinated with broader Territory Controls, these changes run the risk of diluting the viability of nearby Group and Local Centres in the area, and is likely to impact the Fyshwick markets.

## Recommendations

The following recommendations are suggested for DA102:

1. Continue with the proposed built-form, density and height controls.
2. Review potential impacts to the Centres hierarchy generally, and the vitality of Group and Local Centres in the surrounding suburbs.
3. Consider introducing GFA controls for Retail similar to those currently in place in the *Territory Plan 2023* – e.g. a GFA Limitation of up 300m<sup>2</sup> for Retail Shop Selling Food.

Should you require any further information, please do not hesitate to contact me on 02 6262 6363.

Kind Regards

Richard Nash  
**Principal Planner**  
SPACELAB

Dear NCA planning committee,

I'm writing to give feedback on DA102, Hume Circle Precinct, particularly part 4.19.3.2, "Restore and emphasise the Griffins' vision by: extending McMillan Crescent to complete this circle".

I am a resident of 111 Canberra avenue "Axiom". Extending McMillan Crescent will require demolishing my building. I have built a home here with my family, and am hoping to spend the rest of my life in this lovely building.

Beyond being heartbreaking for myself and the many other residents of 111 Canberra avenue, Axiom is a very new building -- completed in 2018, and by no means falls under the description of being "unsuitable for contemporary use" used in the Background Paper. The demolition of a perfectly good, modern building for the 'geometry' and 'vision' of an original plan for a city that barely resembles modern Canberra would be environmentally wasteful. It also seems rooted in the past and not responsive to the present reality of Hume Circle.

I realise that this amendment is a statement of intent, rather than a firm plan, but I would urge the committee to remove this statement/objective in DA102. Having this statement hanging over the residents' heads will cause substantial psychosocial harm and challenge the future of all the residents of 111 Canberra Avenue.

Enabling more people to live and work around Hume Circle is a worthy idea, but please don't just see the light industrial area: some people already live here! Please don't bulldoze my home!

Best regards,

*Submitters name withheld*

Good Evening,

I am writing as an owner-occupier of Axiom Apartments (111 Canberra Avenue, Griffith) to formally lodge my objection to the proposed amendments for the Hume Circle Precinct.

My residence is directly situated within the area identified for significant urban transformation under this amendment.

Grounds for Objection:

My primary concerns regarding the proposed Draft Amendment include:

**Risk to Residential Security:** The current plans for the McMillan Crescent extension create a high degree of uncertainty for the residents of 111 Canberra Avenue. The proposed alignment appears to threaten the structural integrity or the very existence of the Axiom Apartments block.

**Loss of Established Housing:** At a time of housing shortages, the demolition of a modern, high-density residential complex like Axiom to accommodate a road extension is counter-intuitive and a poor use of existing infrastructure.

**Impact on Amenity and Value:** The mere proposal of this extension negatively impacts the property value and the "quiet enjoyment" of my home. The threat of future resumption or demolition places an unfair emotional and financial burden on owner-occupiers.

**Lack of Justification for Road Alignment:**

I do not believe the NCA has sufficiently demonstrated that the McMillan Crescent extension requires a path that necessitates the demolition of existing residential buildings. Alternative traffic management solutions should be prioritized that preserve the existing community fabric.

**Conclusion and Desired Outcome:**

I request that the National Capital Authority:

Re-evaluate the McMillan Crescent extension to ensure it does not infringe upon the footprint of 111 Canberra Avenue.

Provide explicit guarantees to the residents of the Axiom Apartments regarding the long-term status of our homes.

Conduct further community consultation specifically for the residents of the affected blocks to discuss alternative alignments.

I look forward to your response and the publication of the Consultation Report.

Kind regards,

Natasha Raab

## **14 February 2026 Amended Submission**

### **Notice of Opposition to proposed National Capital Plan Draft Amendment 102 – Hume Circle Precinct (DA102)**

With the benefit of the two-week extension provided by the NCA, we have had an opportunity to seek further information in relation to the proposed amendment. This has included extensive engagement with our local community organisation, academics with specific expertise relevant to the proposed amendment, developers, and representatives from both federal and territory governments. While these engagements have provided sufficient information to inform this submission, we note that the extension period remained insufficient for progression of our FOI through the ACT Government, which we have been advised will not be completed until 07 March 2026.

Further, based on the issues identified within the shadow study, and the totality of procedural issues seemingly evident in the development and release of NCA Draft Amendment 102, we have written to our relevant federal and territory representatives detailing the specifics of our concerns and asking that an ANAO audit be requested regarding the planning and execution of this process.

#### **1. Introduction**

1.1 This submission is made by the undersigned residents directly affected by Draft Amendment 102 (DA102).

1.2 It addresses deficiencies in consultation, statutory compliance, and planning justification, and considers whether the amendment meets the requirements of the Planning and Land Management Act 1988 (PALM Act) and the objectives of the National Capital Plan.

1.3 Reservation of rights: This submission is made on the basis of information currently available to the submitters. Nothing in this submission should be taken as a waiver of any rights, remedies, or procedural entitlements available to the submitters under the Planning and Land Management Act 1988, the Administrative Decisions (Judicial Review) Act 1977, or at common law. The submitters expressly reserve the right to raise additional matters or provide further submissions should additional information become available or should procedural deficiencies not be remedied.

#### **2. Deficiencies in Community Consultation**

2.1 The consultation process for DA102 has not enabled informed or meaningful participation by affected residents.

2.2 The release of consultation material during the period 05 January 2026 to 03 February 2026 materially constrained community awareness and engagement.

2.3 Key publication dates were misaligned. The proposed release date (5 January) did not align with the Gazettal date (8 January), nor with publication in a *principal daily newspaper*, which did not occur until 21 January.

2.4 The earliest apparent public availability of the amendment via a third-party website does not satisfy the statutory requirement for notice through a newspaper.

2.5 Consultation opportunities were inadequate, including the scheduling of the sole public meeting after the submission closing date.

2.6 The draft amendment lacks sufficient specificity, particularly regarding development scale and potential impacts on residents within Griffith Section 25.

2.7 These deficiencies materially limit the capacity of affected persons to understand and respond to the proposed amendment.

### **3. Statutory and Procedural Non-Compliance**

3.1 There are serious concerns that the consultation process did not comply with section 15 of the *Australian Capital Territory (Planning and Land Management) Act 1988* (The Act).

3.2 Although the Gazettal notice is dated 8 January, it was only following reporting in the *Canberra Times* on the 21 January that the majority of residents became aware of the proposal, reducing the effective consultation period to approximately 12 days. It is noted that the report in the *Canberra Times* does not appear to have been associated with NCA publication of the notice, but rather in response to concerns raised by members of the Inner South Community Council.

3.3 Section 15(1)(b)(ii) of The Act requires a reasonable consultation period following publication in the principal daily newspaper. On the face of the available information, this requirement was not met.

3.4 The apparent substitution of the legislated term *principal daily newspaper* with the NCA's re-defined standard of '*a newspaper in general circulation*' does not appear to be supported by the current wording of The Act.

3.5 Further, we would contend that publication via a third-party website does not meet the statutory test.

3.6 In addition, the process does not align with the National Capital Authority's stated Community Engagement Principles, including commitments to be intentional, inclusive, timely, and transparent.

3.7 We note that in response to direct questioning from Senator Pocock at Senate Estimates on Monday 9<sup>th</sup> February, the NCA CEO described in some detail a range of consultative steps that were not taken in relation to this amendment. We would contend that Ms Doran's response only served to further highlight the deficiencies arising from NCA's behaviour in this matter.

### **4. Strategic Planning Justification**

4.1 DA102 does not clearly articulate how the proposed changes advance the objectives of the National Capital Plan.

4.2 The amendment lacks a clear explanation of intended outcomes, development yield, and infrastructure implications.

## **5. Land Use Compatibility**

5.1 The amendment does not sufficiently demonstrate that the proposed land use changes will avoid adverse impacts on surrounding development.

5.2 Greater clarity is required regarding compatibility, buffering, and implications for the established Griffith Section 25 precinct.

## **6. Built Form and Scale**

6.1 The introduction of development of up to 15 storeys represents a significant departure from the existing and planned character of the area.

6.2 The amendment does not provide adequate justification for this scale, nor does it demonstrate appropriate transition, massing control, or mitigation of amenity impacts.

## **7. Urban Design and Public Realm**

7.1 The amendment does not adequately establish how acceptable urban design and public realm outcomes will be achieved.

7.2 Matters requiring further detail include streetscape quality, landscaping, public space provision, and precinct coherence.

## **8. Transport Assumptions**

8.1 The amendment relies on an assertion that Hume Circle functions as a major transport hub.

8.2 This assertion is not supported by existing conditions, including limited bus proximity, minimal rail services, and the absence of any committed light rail extension.

8.3 Absent substantive public transport investment, increased density will result in increased reliance on private vehicles.

## **9. Parking and Traffic Impacts**

9.1 The amendment is silent on parking provision and traffic management.

9.2 Existing congestion along the Causeway, Anzac Bridge, and Dairy Road demonstrates that the local road network is already under pressure.

9.3 Increased density without corresponding transport infrastructure will exacerbate congestion and parking impacts.

## **10. Environmental and Amenity Impacts**

10.1 Potential impacts relating to noise, air quality, visual bulk, and urban heat are not addressed with sufficient clarity or enforceable controls.

10.2 These matters require further assessment and explicit mitigation measures.

## **11. Architectural Context**

11.1 The reliance on Walter Burley Griffin's vision to justify high-rise development is not supported by historical or architectural evidence.

11.2 The Hume Circle area would have been conceived as medium-density development, consistent with terraced or semi-detached forms.

11.3 As a leading figure of the Prairie School, Griffin rejected the Chicago School emphasis on tall and monumental buildings.

11.4 The proposed scale is inconsistent with that context.

## **12. Demonstrable and Disproportionate Harm to Section 25**

12.1 Following engagement with developers, Territory planning officials, and the NCA Chief Executive Officer, we contend that Draft Amendment 102 would introduce immediate and demonstrable planning blight affecting existing property owners within Griffith Section 25.

12.2 The amendment would permit development up to 15 storeys immediately adjacent to the established residential complexes known as Staffordshire Terrace, McMillan Gardens, and Avalon Apartments. Even absent a current development application, the introduction of this permissibility materially alters the planning context and creates ongoing uncertainty regarding bulk, scale, overshadowing, privacy, traffic generation, and visual dominance.

12.3 Property markets respond rationally to anticipated changes in amenity and built form. The prospect of high-rise development in immediate proximity to established low-rise residential buildings is likely to diminish owner-occupier demand and materially affect market perception of the precinct. This constitutes a foreseeable and articulable consequence of the amendment, not mere speculation.

12.4 Notwithstanding the height permissibility introduced by DA102, any redevelopment of Section 25 would require consolidation of numerous individually owned apartments or the exercise of compulsory acquisition powers. In practical terms, this introduces substantial transactional and legal complexity, rendering redevelopment uncertain in both timing and feasibility. The result is the creation of prolonged strategic uncertainty without corresponding deliverable redevelopment outcomes.

12.5 Further, advice obtained during preparation of this submission indicates that any high-density redevelopment would necessitate significant upgrades to supporting infrastructure, including sewerage capacity, electricity distribution, local road networks, and public transport connectivity, including potential extension of light rail infrastructure toward Fyshwick. There is no clear evidence within DA102 of funded or staged infrastructure sequencing to support such intensification.

12.6 In the absence of defined infrastructure delivery or staging, the amendment risks premature intensification inconsistent with orderly planning principles. It introduces development potential

without demonstrating that the physical and transport systems required to sustain that intensity are available or committed.

12.7 The combined effect is the imposition of concentrated planning uncertainty on a small, established residential enclave, without demonstrated public benefit commensurate with the disruption imposed. This disproportionate impact distinguishes Section 25 from surrounding areas and weighs against adoption of the amendment in its current form.

12.8 We contend that DA102 gives rise to immediate planning blight and foreseeable economic destabilisation arising from diminished amenity expectations and prolonged uncertainty, in circumstances where redevelopment is neither imminent nor infrastructure supported.

### **13. Conclusion and Relief Sought**

13.1 For the reasons set out above, DA102 appears affected by procedural deficiency and insufficient planning justification.

13.2 Accordingly, we oppose that progression of Draft Amendment 102, and further respectfully request that the Minister commission a review of the NCA's actions regarding this matter, with particular attention to whether:

13.2.1 the consultation activity was conducted in accordance with the legislative requirements of the *Australian Capital Territory (Planning and Land Management) Act 1988*.

13.2.2 the consultation was conducted in accordance with the NCA's Community Engagement Principles.

13.2.3 the supporting studies requested by the NCA Board in April 2025 had been subject to appropriate diligence prior their presentation to the board in support of the final submission.

13.2.4 the published amendment represented a fair and honest description of the NCA's intent and the amendment's potential impact on the residents of Hume Circle and their immediate community.

Kind Regards,

Dear Rebecca / National Capital Authority,

We, the business owners of Power Kart Raceway ACT Pty Ltd would like to make a submission about the Draft Amendment 102 Hume Circle Precinct. We aren't necessarily against the proposal however would like amendments to the proposal based on our business requirements and future planning.

1. Our business is a Family Entertainment Centre which we believe is permitted under the Land Use A as an Indoor Recreation Facility. Our business has future plans to expand our track outdoors onto the "over flow carpark" between our building and the Canberra Milk Factory. We also have other plans to use this space for alternate recreational activities. Therefore we request that outdoor recreation facilities be included the Draft Amendment to permit our business to continue to expand and utilize this outdoor area.
2. We have significant concerns about new residential development beside our building and the potential noise complaints. Although we as a business contain our noise to inside the centre we rely on an atmosphere in the centre which includes music to be played in our centre from 8.30am to 10pm daily Monday to Sunday. Further to that we have electric go karts driving around our track during these same hours which can cause tyre screeching noises on a regular occurrence. We request the Draft amendment to include protection for us as an established business to be able to continue our operations without incurring any penalty for continuing to operate our business when new development occurs around us.
3. The draft proposal shows potential realigning of the Canberra Ave roundabout and associated roads. We would like the amendment to have provisions included in it for access driveways in and out of our family entertainment centre. We are currently located on the quiet service road along Canberra Ave and a change to this would have significant impact to customers safely entering and exiting our premises. We also currently have two entry and exit points which provide safe access in and out for bus access. We see up to 10 busses a week bring school students to our premises so require good access in and out of our centre to allow the buses to drive through safely.

Thank-you for including our amendments and your time on the phone this week. Please feel free to call me at any time to discuss any of the above.

Reece MacNaught

Dear National Capital Authority,

I am writing as an ACT resident who works in the parliamentary triangle to comment on Draft Amendment 102 – Hume Circle Precinct. I do not support the amendment in its current form.

### **1. Statutory purpose and proportionality**

Under the Australian Capital Territory (Planning and Land Management) Act 1988, the NCA's core functions are to prepare and administer a National Capital Plan that ensures Canberra and the Territory are planned and developed in accordance with their national significance, to protect nationally significant areas, and to manage National Land required for the special purposes of the National Capital. Those functions are directed to safeguarding the Commonwealth's interest in national institutions, symbolic vistas, and key approach routes.

I recognise that the NCA may view the Hume Circle Precinct as engaging national interests, particularly as part of an eastern gateway to the Parliamentary Triangle. Gateways, approach routes and symbolic arrival sequences are clearly within the Commonwealth's proper remit under the PALM Act. The question, however, is not whether any national interest exists in this location, but whether the specific controls proposed in DA102 are proportionate, necessary, and uniquely within the Commonwealth's competence to deliver.

DA102 is presented as enabling "renewal of an existing urban area in a manner consistent with the Griffins' Plan" and "improving housing supply supporting the national agenda." However, the amendment appears to regulate matters that extend well beyond gateway character and symbolic approach qualities. To understand where Commonwealth control is genuinely required, it would be helpful to distinguish:

*Legitimate Commonwealth interests in this location:*

- Gateway massing envelopes that protect key approach vistas
- Architectural character and public realm quality at interfaces with National Land
- Sight lines to and from nationally significant landmarks
- Coherence of arrival sequences into the Parliamentary Triangle

*Primarily local planning matters:*

- Residential tenure mix and affordability mechanisms
- Yield optimisation within individual development parcels
- Fine-grain height transitions between existing and new buildings
- Replacement ratios for existing medium-density housing stock

- Detailed land use mix within commercial/residential precincts

Much of what DA102 proposes appears to fall into the second category. In practice, this looks like an incremental expansion of Commonwealth planning control beyond what is necessary to protect national significance, rather than a targeted intervention clearly justified by Commonwealth interests that the ACT planning system cannot adequately address.

I ask the NCA to:

- Publish a clear statement of which specific national interest objectives require Commonwealth control in this precinct, distinct from general urban renewal goals
- Identify which controls in DA102 would not exist if the precinct were planned solely under ACT legislation
- Explain why ACT planning controls are insufficient to protect those specific Commonwealth interests

## **2. Patchwork governance and duplicative bureaucracy**

Successive amendments to the National Capital Plan have created a patchwork of Commonwealth and Territory responsibilities across Canberra, in which small precincts fall under one system or the other depending on historic boundaries or incremental extensions of designated areas. This fragmented approach makes it difficult for residents and businesses to understand who is responsible for planning outcomes in their neighbourhoods, and creates duplicative processes when proponents must navigate both NCA and ACT approval pathways for closely related projects.

DA102 continues this pattern. The amendment explicitly relies on ACT Government urban intensification strategy while imposing separate Commonwealth controls. The result is not coherent planning but two authorities steering the same area from different directions, which is inefficient for proponents, confusing for residents, and is not demonstrably required to protect any asset of clear national significance.

The NCA's designation of areas should follow a principled test: Commonwealth control is justified where (a) a nationally significant interest exists, and (b) ACT planning controls would be structurally unable or unwilling to protect that interest. DA102 does not articulate such a test, nor demonstrate that it has been met.

If the NCA believes a stronger Commonwealth role is warranted in this location, it should explain:

- Why the existing ACT planning framework is inadequate to achieve the stated national interest objectives

- What specific risk would materialise if this precinct were developed under Territory controls alone
- How Commonwealth control improves rather than complicates governance and accountability in this instance

### **3. Coordination failures: limits of authority and institutional ambition**

The NCA's approach to the Commonwealth Avenue Bridge renewal project illustrates the limits of coordination without authority, and raises questions about how the NCA uses its influence when national interests genuinely are at stake.

Public documents confirm that options for integrating Light Rail Stage 2 into the bridge upgrade were considered, and that a joint steering committee was established to manage interface and delivery risks. Despite this governance structure, the bridge works and light rail extension are proceeding as separate projects, with different timelines and no integrated design solution. There is no single coordinated bridge structure or combined works package that would minimise disruption over the medium term and long-term cost.

The question this raises is not one of process (as some consultation occurred) but of institutional ambition and insistence. The NCA had a seat at the table. It did not, however, insist on an integrated outcome, despite having statutory responsibility to "secure the Australian Government's interest in the planning and development of the National Capital."

For ordinary Canberrans, the practical consequences include:

- Multiple, overlapping periods of disruption on the same critical section of the transport network
- Avoidable duplication of construction staging, traffic management, and associated costs
- Increased risk that short-term design decisions constrain or complicate later light rail delivery

This example is relevant to DA102 because it tests the NCA's claim to exercise planning authority on the basis of superior coordination and national perspective. If the NCA settles for loosely coordinated, sequential infrastructure delivery when faced with a clear opportunity for integration on a genuinely nationally significant corridor, it undermines the case for Commonwealth planning control over fine-grain urban renewal in areas like Hume Circle where the national interest is less self-evident.

The NCA should be asked:

- What prevented an insistence on integrated bridge/light rail delivery as a condition of Commonwealth support or approval
- Whether the NCA considers the sequential delivery approach consistent with best-practice planning for nationally significant infrastructure
- How this outcome informs the claimed advantages of Commonwealth planning control in other contexts

#### **4. Restraint and institutional focus**

The National Capital Plan is intended to provide "the strategy and blueprint giving effect to the Commonwealth's interest and intentions for planning, design and developing Canberra and the Territory," particularly as these relate to national purposes and symbols. That mandate calls for restraint as much as intervention: a disciplined focus on what only the Commonwealth can do, and a conscious effort not to duplicate Territory planning on ordinary urban development matters.

By extending the Plan to drive detailed redevelopment of areas like the Hume Circle Precinct, where the primary policy justifications cited are increased housing supply and alignment with ACT urban intensification strategies, the NCA risks diluting its core statutory function. The more it behaves like a parallel local planning authority, the harder it becomes to assess whether its decisions are genuinely guided by national significance or by broader city-shaping ambitions that properly belong with democratically accountable Territory institutions.

Institutional restraint is not a retreat from responsibility. It is recognition that the Commonwealth's planning role is strongest when it is most selective, focused on those elements of the Capital that cannot be adequately protected through Territory processes alone.

#### **5. Consultation, transparency and community confidence**

Concerns have already been raised publicly about the timing and adequacy of consultation on DA102, particularly notification of affected residents in existing low-rise complexes and the potential loss of established medium-density housing, green space and local amenity. Given its role as "trustee of the National Capital," the NCA should hold itself to a standard of transparency and genuine engagement that exceeds, rather than mirrors, that expected of other planning bodies.

For DA102, the NCA should:

- Publish the full range of options considered, including lower-scale scenarios deliverable under ACT planning controls, with clear explanation of why Commonwealth intervention was deemed necessary

- Provide accessible material that demonstrates the specific link between proposed controls and national significance, distinct from general housing policy objectives
- Allow sufficient time for targeted engagement with affected owner-occupiers and tenants, including workshops or briefings for those facing potential displacement
- Commit to transparency about how submissions will be weighted and considered in the final recommendation to the Minister

## **6. Requests**

In light of the above, I ask the NCA to:

1. Publish a statement of national interest objectives specific to DA102, identifying which elements of the proposal address Commonwealth interests that ACT planning could not adequately protect, and which controls would not exist if the area were planned under Territory legislation alone.
2. Articulate a principled test for when Commonwealth designation is justified, and demonstrate that DA102 meets that test—specifically addressing why existing ACT planning frameworks are inadequate in this instance.
3. Explain the outcome of Commonwealth Avenue Bridge and light rail coordination, including what prevented integrated delivery and whether the NCA considers the sequential approach consistent with its statutory responsibility to secure Commonwealth planning interests in nationally significant infrastructure.
4. Work with the ACT Government to review and rationalise the boundaries of Commonwealth planning control across the Territory, removing unnecessary overlaps and ensuring residents are not subject to duplicative processes where no clear national interest is at stake.
5. Extend and improve consultation on DA102, including direct engagement with affected residents, transparent publication of alternatives considered, and a clear account of how submissions will influence the final recommendation to the Minister.

The NCA plays an important and necessary role in safeguarding the national qualities of Canberra. That role is best served by disciplined focus on matters of true national significance, close cooperation with the ACT Government on everything else, and institutional ambition that is directed toward outcomes, such as integrated infrastructure delivery, rather than expansion of administrative reach.

Yours sincerely,

*Submitters name withheld*

Hi

I am owner occupier at Staffordshire Terrace

I currently reside in a medium density complex

In your blue print you want high density and medium density "????????????????"

The complex is just 30 years old and has beautiful trees and gardens

This green inner city living environment is what people and government desire

I have no desire to move

The desire to re do and improve Eastlake and industrial area of roundabout in Fyshwick is a great idea

The idea of rezoning a residential area with existing apartment is a first for NCA I would be lead to believe

The very short notice to change of submission period is not good when dealing with peoples homes

Some of my neighbours are suffering depression and huge worry about their future

I am a pensioner as quite a few other owners, moving out and being able finance to buy elsewhere at this later stage in life

Is not possible

Kevin Gibbs

Dear Chief Planner

I strongly oppose the National Capital Plan Draft 102 – Hume Circle Precinct in its current form.

If I am reading this properly, Walter Burley Griffin's original plan (Almost 100 years ago) was to have Macmillan Crescent extended to meet Wentworth Ave.

I live in the Axiom building at 111 Canberra Avenue, if this goes ahead, the extension will go through our building.

The building is only 8 years old, the knowledge of Burley Griffin's plan has been known for almost 100 years.

Therefore, whoever approved Axiom being built is negligent, which would lead to possible legal action if it proceeds.

Also, the increased traffic for this area would be a nightmare.

There are plenty of accidents that already occur at the intersection of Leichhardt Street and Wentworth Avenue.

The rise in the height of the buildings surrounding to 15 storeys is not appropriate for the area, a maximum of 10 storeys would be more appealing.

Please contact me so we can discuss this further

Cheers

Chris

Hi

I lived at ... for 2 years from 2023. I used to regularly walk my dog and cycle around the area, down to the bakery or the markets.

The Hume roundabout is no mans land. Send someone out with a clicker to count pedestrians for a day and they'll come back and tell you they could have just counted on their fingers and are experiencing asthma symptoms. I really do encourage you to head down yourself to the roundabout and sit there for a good 30 minutes to experience it.

Its a highway interchange. It will still be a highway interchange even after adding planter boxes, crossings, and wider footpaths.

It's genuinely just miserable to be around; loud, smelly and impossible to cross, which is okay - because it's a highway interchange.

Putting high rise here is absurd.

- Canberra has farm animals on better land than these proposed buildings. (See Dairy Road or the Curtin equestrian parks)
- The higher building limits are overlayed on buildings that are already much denser than the surrounding area.
- There are swaths of open space, away from the highway but still with access to amenities. I've attached an example .geojson (use [geojson.io](https://geojson.io) or similar to view). You could also consider currently low-density areas around Collins Park, Griffith, Deakin, Red Hill, Curtin Equestrian parks, or even the national triangle itself, which by surface area is more carparks than buildings.

I agree with a project to increase density but there are better locations.

Dear Sir or Madam,

Please find below my submission regarding National Capital Plan Draft Amendment 102 (Hume Circle Precinct).

The submission supports housing delivery in appropriate locations but raises concerns that the scale and intensity of development proposed at Hume Circle is inconsistent with the original Walter Burley Griffin Plan, undermines the amenity of surrounding residential communities, and is unnecessary to achieve housing objectives when alternative, better-aligned locations are available.

I would appreciate this submission being considered as part of the assessment of the Draft Amendment.

Kind regards

*Submitter name withheld*

National Capital Plan – Draft Amendment 102 Hume Circle Precinct

### **Executive Summary**

On the whole, this submission supports increased housing supply and urban renewal in Canberra, including appropriate development within Designated Areas under the National Capital Plan. However, Draft Amendment 102 (DA102) proposes a scale and intensity of development at Hume Circle that is inconsistent with the original Walter Burley Griffin Plan, undermines the amenity and integrity of adjoining garden suburbs—particularly Griffith and Narrabundah—and is unnecessary to achieve housing supply objectives.

Hume Circle (Eastlake Circle in the Griffin Plan) was conceived as a landscape-dominated gateway and organising civic element, not as a high-density residential node. Proposed building heights of 8–15 storeys represent a fundamental departure from Griffin’s principles of landscape primacy, gradual scale transition, and protection of surrounding residential areas.

Equivalent or greater housing yield can be delivered in locations that are more consistent with Griffin’s planning logic, including East Lake, Kingston, and established town centres such as Woden and Belconnen, without introducing high-rise development immediately adjacent to established residential communities.

Key Recommendations:

- Retain Hume Circle as a low- to mid-rise (3–5 storeys), landscape-led gateway precinct

- Explicitly protect Griffith and Narrabundah amenity through height limits and buffers
- Redirect higher residential densities to East Lake and established town centres
- Strengthen alignment with National Capital Plan heritage, landscape, and approach-route objectives

## **1. Purpose of Submission**

This submission responds to Draft Amendment 102 (Hume Circle Precinct) and assesses the proposal against the statutory objectives of the National Capital Plan, including:

- Griffin Plan intent and heritage values (Objective 1.1)
- Landscape systems and Designated Area principles (Objectives 2.1–2.3)
- Impacts on surrounding residential areas (Objective 3.4)
- Availability of alternative locations and long-term land-use flexibility (Objective 4.1)

## **2. Griffin Plan Context and Intent**

Primary Issue for Assessment: Misinterpretation of Hume Circle’s intended role.

In the Griffin Plan, Hume Circle corresponds to Eastlake Circle and was intended to function as:

- A formal geometric node within the radial avenue system
- A landscape-dominated gateway on the Canberra Avenue / Causeway approach route
- A civic and organising element, rather than a residential centre.

### **Griffin Planning Principles Relevant to Hume Circle**

- Landscape primacy over built form (Objective 2.1)
- Low-rise development adjacent to residential areas (Objective 3.4)
- Hierarchical concentration of height and density in central civic areas, not gateway circles (Objective 1.1)

While DA102 acknowledges the geometric significance of Hume Circle, it does not reflect the intended civic, landscape, or gateway function of the place. Instead, it proposes development outcomes more characteristic of a town centre or transit node, neither of which aligns with Griffin’s intent for this location.

### **3. Relationship to Surrounding Residential Communities**

#### **3.1 Griffith (Objective 3.4 – Residential Amenity)**

Griffith represents one of Canberra’s most intact Griffin-derived garden suburbs, characterised by:

- Predominantly one- and two-storey development
- Mature tree canopy and generous setbacks
- Carefully managed edges and scale transitions.

The introduction of 8–15 storey buildings immediately adjacent to Griffith would result in:

- An abrupt and incompatible scale transition of up to 10:1
- Visual and physical domination of residential streets
- Erosion of the garden suburb structure that the National Capital Plan seeks to protect.

#### **3.2 Narrabundah**

Narrabundah retains a similarly low-density, landscape-dominated character consistent with Griffin-influenced planning principles. The same impacts on amenity, overshadowing, noise, and visual intrusion would occur at its interface with the proposed precinct.

#### **3.3 Amenity Impacts (Objective 3.4)**

Likely impacts of the proposed development include:

- Overshadowing and wind-tunnel effects on adjacent dwellings
- Increased traffic and noise penetrating established residential areas
- Loss of landscape continuity and perceived openness
- Precedent pressure for incremental up-zoning of surrounding residential land

### **4. Housing Yield and Alternative Locations (Objective 4.1)**

Indicative analysis suggests DA102 enables approximately 4,500–5,500 dwellings through mid- to high-rise development at Hume Circle.

A Griffin-aligned alternative—retaining Hume Circle at 3–5 storeys with lower heights at residential interfaces—could still deliver approximately 1,600–2,000 dwellings, while preserving landscape dominance and residential amenity.

The remaining housing yield would be accommodated in locations that better align with National Capital Plan objectives, including:

- East Lake, explicitly identified in the Griffin Plan and suited to transport-oriented development
- Kingston, building on its established arts and civic focus
- Woden and Belconnen town centres, where buildings exceeding 15 storeys already exist
- Civic and Constitution Avenue, through controlled infill within existing frameworks

This demonstrates that DA102 housing objectives can be achieved without introducing high-rise residential development at the Hume Circle residential interface.

### **5. National Capital Plan Statutory Considerations**

- Objective 1.1 (Heritage): The proposal creates a precedent whereby Griffin geometry is cited to justify outcomes inconsistent with Griffin's planning intent.
- Objectives 2.1–2.3 (Landscape): Increased site coverage and building height risk canopy loss and urban heat effects, contrary to landscape systems policy.
- Objective 3.2 (Approach Routes): The visual bulk of high-rise development would compromise the Canberra Avenue gateway experience.
- Objective 4.1 (Future Flexibility): Intensive residential development may foreclose future civic or transport uses originally envisaged for the site.

### **6. Community Evidence (Objective 3.4)**

ACT Legislative Assembly Petition E-PET-005-26 (390 signatures as at 10am 31 January 2026) demonstrates community concern regarding:

- Height and density at the residential interface
- Adequacy and timing of consultation
- Loss of existing medium-density housing and green space

The petition's requests align closely with the concerns and recommendations outlined in this submission.

### **7. Specific Recommendations**

It is recommended that Draft Amendment 102 be amended to:

1. Introduce maximum building heights of 5 storeys, with lower limits at residential edges (Objectives 1.1, 3.4)

2. Provide minimum 50-metre buffers and graduated height transitions to Griffith and Narrabundah (Objective 3.4)
3. Reinforce Hume Circle's role as a landscape-dominated gateway precinct, permitting civic and mixed-use functions rather than high-density residential (Objective 2.1)
4. Redirect higher residential densities to East Lake and/or established town centres (Objective 4.1)
5. Extend consultation to 28 February 2026 in response to demonstrated community concern and principles of procedural fairness

## **8. Conclusion**

Draft Amendment 102, as currently proposed, fails to satisfy multiple National Capital Plan objectives by enabling high-rise residential development at a landscape and civic gateway immediately adjacent to protected garden suburbs, when equivalent housing outcomes are achievable elsewhere.

A revised, Griffin-aligned approach would deliver housing supply while preserving heritage values, residential amenity, landscape integrity, and the long-term credibility of the National Capital Plan.

Hello,

I'm writing to voice my concern over the **Hume Circle Precinct proposal (DA 102)**.

I oppose Draft Amendment 102 because it would dramatically increase building heights and density in the Hume Circle Precinct, threatening established medium-density communities and permanently altering the character and liveability of the area. The proposal overlooks the existing housing diversity already provided in the inner south. I am calling for the amendment to be revised so that established low-rise and medium-density complexes are protected, with any future development limited to appropriate medium-density heights consistent with areas like Kingston.

Thank you

I can see practical and visual benefit from developing the area proposed on Hume Circle But only if the development is aligned to the height of the nearby hotel ie 3-4 stories high.

No apartment towers are at all appropriate. They contradict the surrounding environment.

Marguerite Castello

To the Chief Planner,

I wish to provide feedback in draft proposal DA102.

The traffic congestion through this roundabout during morning and evening rushes is already substantial. From my understanding of the proposal, road efficiency considerations have effectively been removed from the plan, continuing to place responsibility with the ACT Government for roads within the precinct, but providing it with no funds to make any required improvements to support significant increases in traffic.

Furthermore, the plan states that the precinct is serviced by public transportation and proximity to employment nodes. The only public transport in the area is suburban bus. There are no plans for the ACT's light rail network to operate anywhere near the proposed Hume Precinct. (And what employment nodes are within walking distance of the proposed precinct cited as a driver for densification?)

Increases to the number of people living and working in the precinct, under servicing by public transportation, and already marked traffic congestion at the Hume roundabout have the potential to create a road system that does not function in the interests of residents.

**If density increases, but people still have no choice but to drive, the system will break down.**

The draft plan currently provides no information about how the road system or public transport will be managed, giving rise to serious questions about the validity of the project.

Additionally, what considerations have been given to the effects on the safety of students at the schools within and adjacent to the schools in Canberra Avenue? With significant increases to car traffic arising from the proposed developments, there will be serious safety concerns. The plan should state how these concerns will be managed.

Regards, Lily

I oppose Draft Amendment 102 because it would dramatically increase building heights and density in the Hume Circle Precinct, threatening established medium-density communities and permanently altering the character and liveability of the area. The proposal overlooks the existing housing diversity already provided in the inner south. I am calling for the amendment to be revised so that established low-rise and medium-density complexes are protected, with any future development limited to appropriate medium-density heights consistent with areas like Kingston.

This is an ill-thought effort for unnecessary development in the area and will bear only ill fruit.

Dear NCA,

Our names are Natalie Ison and Michael Roberts, and we oppose *Draft Amendment 102 Hume Circle Precinct* as it is currently written. We are owner occupiers in ... Griffith.

We request that the NCA remove established residential buildings from its rezoning and also review building height in line with established suburb plans.

We outline more below. We have concerns around the future of Section 84 as it pertains to this rezoning; building height - particularly with regards to solar access and community cohesion perspective; the visual impact to the East entry to Canberra along Canberra Avenue and the Mt Ainslie/Mugga Way axis with respect to the Griffin plan; infrastructure load due to an influx of people; and how the NCA, ACT government and current and future developers plan to address the intangible aspects of social and community value with this proposal. We have sectioned our response into relevant headings but there may be some overlap

### **Recognition of and confusion around future of Section 84 (and 87)**

Please remove existing residences that are currently not part of the East Lake Place Plan from this amendment.

Our complex is in sound condition, well-managed, and was built in the late 90s. It has established gardens and trees. The three complexes at this time within Section 84, are currently affordable, house hundreds of people, and contain significant amounts of embodied carbon. To use the much used quote by Carl Elefante, former president of the American Institute of Architects: "The greenest building is the one that already exists". To rezone these buildings does not simply change planning controls. It will likely redistribute wealth away from existing homeowners in a way that is foreseeable, uncompensated, and structurally unfair.

Using statutory planning power in a way that will systematically transfer value from existing homeowners to private developers, without adequate justification, process, or planning for compensation, will cause foreseeable financial harm.

Page 4 of the draft amendment states: "Hume Circle renewal includes Section 6 and Section 26 Fyshwick but excludes Section 25 Griffith." While we understand that this rezoning is intended to inscribe a design ethos as outlined in the Griffin plan in an area that is about to undergo significant change, Sections 84 and 87 are conspicuous in their absence, despite the fact you have projected over them with combinations of 3-15 storey zones and open spaces.

Why is there no acknowledgement of excluding Section 84 or 87 from immediate redevelopment in either the draft amendment or the background document?

This reads as though the NCA has no knowledge that there are more than 500 residents across these two blocks. By proposing this rezoning, the NCA has put a target on our

affordable, liveable, medium density homes in our established community, in order to build high density apartments, under the guise of building more affordable homes.

On page 24, the draft amendment states: “The circles identified as the ‘Griffin Plan circular geometry’ shown in Figures 146 and 147 are illustrative only, of the future potential to complete the circular geometry within the Hume Circle Precinct.” We’re sure the NCA can appreciate that not acknowledging these parcels in this draft amendment is cause for alarm from residents who are currently not part of the East Lake Place Plan. It is upsetting to suddenly feel that this plan for development has encroached on these complexes, with no consultation until now, and that this rezoning amendment will be used to ram through subsequent immediate and unnecessary developments in this Section at immeasurable detriment to the current residents.

We repeat: *Please remove existing residences that are currently not part of the East Lake Place Plan from this Amendment.*

### **Building height proposals and the eastern approach**

*Please review the Amendment's building height recommendation to something reasonable and cohesive with the rest of the area.*

We acknowledge that the draft amendment intends for developments to “showcase design excellence and sustainability in landscape, architecture and the public realm”(Point 3, Sect 4.19.3). If this is to be one of the significant gateways to Canberra, which will be held up as such, then the standard of development needs to be an exemplar of good and sustainable design and not to be geared at maximising profits to developers.

The *Griffith Precinct Map and Code* states that buildings in RC4 should be a maximum of 4 storeys and should be compatible with adjacent development (future or existing) of an appropriate scale, and importantly, “minimise detrimental impacts, including overshadowing and excessive scale” and “are no higher than the established tree canopy along main avenues with primarily landscaped frontage” (p14-15 , *Griffith Precinct Map and Code* ). 8-15 storey buildings in this area are not in keeping with the legislated design codes for the surrounding areas, disrupt both axes, disrupt the tree canopy, and are of an excessive scale.

The height of current buildings is not disruptive and still gives developers and architects plenty of opportunity to be creative and innovative. Regardless of the outcome of this amendment, the NCA must review the Amendment's building height recommendation to something reasonable and cohesive with the rest of the area.

Furthermore, the NCA and ACT government has set precedents for lower building heights in the inner North and South overall.

On building height and a precedence:

1. Views on building height were received for Amendment 86 on the Anzac East and West building heights (p19 of consultation report). Anzac Park East is 25m tall ([https://www.nca.gov.au/sites/default/files/2023-11/ape\\_works\\_approval\\_consultation\\_report.pdf](https://www.nca.gov.au/sites/default/files/2023-11/ape_works_approval_consultation_report.pdf)).

2. East Lake Place plan is slated for Residential Intensification (p.31 <https://hdp-au-prod-app-act-yoursay-files.s3.ap-southeast-2.amazonaws.com/3017/2307/7299/The-Canberra-Spatial-Plan.pdf>) and we acknowledge Sections 84 and 87 are not within this footprint. Not only does Part 1 of the East Lake Place Plan take the Mt Ainslie -Causeway -Mugga Way axis into account, it doesn't propose buildings going up to 15 storeys ([https://www.planning.act.gov.au/\\_data/assets/pdf\\_file/0005/2398145/east-lake-place-plan-february-2024.pdf](https://www.planning.act.gov.au/_data/assets/pdf_file/0005/2398145/east-lake-place-plan-february-2024.pdf)).
3. On the city's North approach which is also managed by the NCA - the maximum allowable building height is 15 storeys in one specific location (Macarthur node - *Northbourne Avenue Corridor Precinct Map and Code*). While the two tallest buildings in Kingston are 15 storeys, they are set a number of blocks back from the access/axis roads.

*Where has the NCA gotten this building height from and why are they applying planning restrictions to this height in this area given the precedence for a majority of lower buildings over Canberra in medium to high density inner city areas?*

The first of the four main elements of the Griffins' design includes the use of topography as an integral design feature and as a setting (p13, National Capital Plan [https://www.nca.gov.au/sites/default/files/National%20Capital%20Plan\\_rev%20April%202021.pdf](https://www.nca.gov.au/sites/default/files/National%20Capital%20Plan_rev%20April%202021.pdf))

Wentworth and Canberra Avenues have residential buildings in line with the Griffith and Kingston *Precinct Map and Code*. As you enter the Hume Circle roundabout, you see trees and mountains. Current building height allows anyone - regardless of height from the ground - to view the topography. Buildings are secondary to and work with nature. 8-15 storey buildings here will be visually disruptive to understanding and embracing the beauty of this topography, and restricts viewing to only those who have paid a premium for the view of our bush capital. Hardly an "equitable" outcome as per the National Urban policy.

We understand and can somewhat support the NCA's efforts in trying to articulate how these corridors might continue to look as time passes and development progresses. We also support taking the Griffins' circular motif to reflect in space and usage design and note that the East Lake Place plan (Part 1) articulates their vision for it on pages 60-68. We do note that if the NCA's building heights are realised this motif will only be interpretable from on high.

On page 2 of the Griffin Legacy Snapshot, published on your site ([https://www.nca.gov.au/sites/default/files/publication-documents/Griffin\\_Legacy%20Snapshot.pdf](https://www.nca.gov.au/sites/default/files/publication-documents/Griffin_Legacy%20Snapshot.pdf)), it says "Urban development pressures and traffic threaten to diminish the capital's special qualities, to encroach on its leafy garden suburbs and erode its celebrated landscape setting" and "There are empty spaces in the heart of the capital". This amendment directly conflicts with the first point about encroachment, traffic, and furthermore, this is not empty space. For the NCA to say that the Griffins intended for this area to be high density when they didn't include Woden, Belconnen, Tuggeranong or Gungahlin, because the plan is 101 years old, feels like you're cherrypicking. As the NCA knows, the Griffins originally proposed a Capitol Building on Capital Hill, not a seat of

government (<https://www.griffinsociety.org/australia-canberra/>). So while the intention to adhere to the Griffin Plan is a nice idea to encourage the design elements to be recognised, there are already famous examples of where this has not been achieved. Another example: <https://region.com.au/the-dream-to-paint-canberras-hills-that-never-quite-bloomed/928437/>

8-15 storey buildings on this precinct will significantly interrupt the “Mt Ainslie – Mugga Way axis that goes through the Causeway in East Lake” (p5 background paper). Here is a current photo of the view.



The NCA acknowledged they received feedback about people driving through main corridors towards or past significant buildings and landmarks (p. 31 of Consultation Report for Amendment 95). While this comment was received in support of building additional significant buildings that people can value during their commute, the cohesion between good development and the ability to still see our natural landmarks is important and we acknowledge this above when we talk about showcasing design excellence for main corridors.

Unlike the heritage listed Parliamentary Triangle vista that is managed by the NCA, the Ainslie - Mugga axis is not heritage listed. The appearance of this axis is no different in its intangible value to the public. Value, significance and experience don't cease to exist because whatever evokes them is not inscribed on a list. It clearly matters to the NCA or they wouldn't have issued Amendment 102 to attempt to control it, and locals have set a precedence in valuing these aspects of Canberra, its vistas, and appearance - if they didn't, they wouldn't have tried to add the city to the National Heritage list in 2022. If preservation of character is what this amendment is trying to accomplish, the building heights and proposed volume of residents within this circle are excessive.

The NCA should have included elevation view renderings to show exactly how this might appear if developers build to the maximum unit height they are proposing within this corridor. There should also be a requirement for developers to show visual impact upon these two corridors as part of their development applications *even if the roads do not form part of their specific development.*

## **Solar Access**

Further to our above points on building height, buildings of the height you propose will overshadow several other residential buildings, resulting in a concrete jungle and an inability for those overshadowed residences to a) grow their own food and plants in their apartments and b) reasonably control temperatures inside – which is not a liveable, equitable, productive, or sustainable outcome as outlined in the *National Urban Policy*.

In the proposed “3 storey transition” area on page 25 of your draft amendment document, apartments in the Staffordshire Terrace complex (currently within this proposed area) are EER5, have south and north facing balconies, and are designed for cross-ventilation in summer to mitigate excessive heat - to the point where some don't need air conditioning. These apartments do not get light to the south in winter, but they do get light to the north allowing residents balcony gardens and sunny front rooms. Placing a 15 storey monolith directly to the north of this area will plunge this area into shade for a significant portion of the year as well as anyone living on the bottom 4-6 storeys of the 15 storey block which would be overshadowed by the 8-storey block. Staffordshire Terrace is well designed with established gardens and solar access. We accept that this complex will eventually reach end of life, but this is not now. Please review the height of whatever you are proposing to replace it with when the time comes for you to actually replace it.

We also note that the NCA mentions in the Background paper that the open spaces will have to consider solar access. How will the NCA measure developers' adherence to solar access provisions, and how will these outcomes be assured when the NCA fails to note the use and purpose, and requirements of open spaces in the amendment draft? We note that the concept of open spaces, in addition to being absent from the amendment draft, is absent from the *AUSTRALIAN CAPITAL TERRITORY (PLANNING AND LAND MANAGEMENT) ACT 1988*. Use of the term “Open Space” is semantically different between the background paper, and the National Capital Plan ([https://www.nca.gov.au/sites/default/files/National%20Capital%20Plan\\_rev%20April%202021.pdf](https://www.nca.gov.au/sites/default/files/National%20Capital%20Plan_rev%20April%202021.pdf)). The NCP uses the term primarily when referring to the NCOSS. We fail to see how these smaller areas in your amendment would be interpreted as “Major open space” and therefore request that you put more emphasis on the use and significance of designated open spaces into any revised and future amendment documents regardless of how Amendment 102 progresses.

## **Open Spaces/Green Spaces/Community value**

Proposing this level of population density increase on both sides of a significant transport axis will require a massive infrastructure upgrade on all facets and parking is already congested. We agree with the points you raise on page 17 and 18 that infrastructure needs to be upgraded as development progresses, but would say this is regardless of development, and feel the NCA, ACT government and developers might be making moves to this, but need to do it now, and holistically as opposed to piecemeal in response to individual development proposals.

Dedicated green spaces can't be left to chance in these documents. As defined by the NCA in (only) the background paper (on p8), “Public Domain - Open Space” is “pedestrian in

nature and with surrounding built form and dimensions that provide for solar access, safe shared ways and strong landscaping”. Are the large planters with a single tree in Founders Lane in Reid an example of strong landscaping? Is the quiet desertedness of the Alexander and Abermale buildings in Woden on a weekend the intent here too?

As these “open spaces” appear to be movement paths for people in lieu of active transport lanes, green and community spaces - designated ones, not ones that are added on piecemeal - where people can meet, but also be close to nature are important: <https://www.witpress.com/elibrary/wit-transactions-on-ecology-and-the-environment/217/36945>. We also have established trees in Section 84. Ensuring it is not part of this rezoning will protect these trees which continue to shade the complex and provide housing for kurrawongs, galahs, corellas, king parrots, white wing choughs, noisy miners, and the occasional possum.

The NCA's documents mention “culture” only a few times, and the majority of your references to “social” are around social housing or around access to cultural and social infrastructure. This is a wonderful area to live, with nice neighbours, and a good community feel. It was very hard for us to get into the housing market as owner occupiers, and we would love for there to be more affordable houses! Not just units higher than 4 storeys off the ground! We would love for there to be more residences that could be purchased on a below-median Canberra income. This response is not us saying “not in my backyard”. We would simply prefer that these new places don't displace us and our neighbours in order to be realised.

As housing becomes denser and still manages to be unaffordable, there is a lot of research being undertaken into social and community values of the built environment. As we mention earlier, the three residential blocks in Section 84 are some of the only affordable housing available in this suburb for those who do not meet the criteria for government assisted housing. *Whatever eventually (read, in 40 years) replaces these will not be affordable if it was the same quality. Anything of a comparable price would be much lower quality:* <https://www.abc.net.au/news/2021-11-09/canberra-first-home-buyers-urged-to-demand-better-apartments/100604016>.

We are truly blessed to live here, this is partly because the area is great and amenities are available, but it is also because it is within a wonderful community. Making reference to social and community value and how this precinct rezone would endeavour to nurture that would also be a step in the right direction. Apparently unit block residents that talk and know their neighbours are unusual. Please address social need etc. holistically as doing it with individual development applications doesn't allow for a whole-of precinct social feel <https://journal-buildingscities.org/articles/10.5334/bc.339>, <https://www.tandfonline.com/doi/full/10.1080/07352166.2024.2311165#d1e175> .

If the majority of the areas within this precinct under “Land use A” end up being commercial and residential, the areas where social value can be built and expressed will only be within your designated open spaces. On the 25<sup>th</sup> Jan, my unit complex had a meeting in our green space about this amendment. I attach a photo of this space. A photo of this space (usually one taken from the direction of the carpark behind the pergola) is often used for real estate marketing of our unit block. This is a well-designed complex full of people who are proactive,

community involved, and value their suburb. The proactivity and initiative of our residents and body corporate was one of the main reasons we were so keen to live here (and I'm sure the NCA has seen from this consultation that we are an engaged and passionate group of people who love where we live). This community value and engagement inherent to these involved suburbs needs to be preserved even as physical buildings change. We recognise that wellbeing and the ability people have to have suitable housing and access to amenity is a key factor of wellbeing, but also creating spaces where people can be healthy, happy, engaged with their community, and have access to the environment is important (p7 [https://www.act.gov.au/\\_data/assets/pdf\\_file/0004/1498198/ACT-wellbeing-framework.pdf](https://www.act.gov.au/_data/assets/pdf_file/0004/1498198/ACT-wellbeing-framework.pdf) )



### **Infrastructure and Egress routes**

East Lake Place Plan will apparently bring 5000 new dwellings into this area (<https://region.com.au/feds-chip-in-2-8-million-to-keep-railway-precinct-and-station-development-plans-on-track/918420/>) As per points 11 and 12 on p3 of [https://hdp-au-prod-app-act-yoursay-files.s3.ap-southeast-2.amazonaws.com/1616/8965/1812/East\\_Lake\\_Place\\_Plan\\_-\\_Listening\\_Report\\_2023\\_-\\_Stage\\_2.pdf](https://hdp-au-prod-app-act-yoursay-files.s3.ap-southeast-2.amazonaws.com/1616/8965/1812/East_Lake_Place_Plan_-_Listening_Report_2023_-_Stage_2.pdf) "We also heard there is a desire to reduce traffic congestion around Hume Circle and Canberra Avenue". Adding more than 5000 new people here is going to push this area's capacity.

We would like to note the following: There are limited safe ways to cross Canberra avenue. There is no safe or effective way to ride bikes down either Canberra or Wentworth Avenue. Infrastructure upgrades need to be progressed, and there are unsettling lighting conditions in the Kingston station precinct (which was subject to a survey by transport NSW in 2025, and was also addressed in the responses to the Draft East Lake Place Plan ) We have seen numerous accidents at the roundabout – which is currently projected to be improved (<https://www.cityservices.act.gov.au/Infrastructure-Projects/city-inner-north-and-inner-south/hume-circle-improvements>)

Currently, two-lane McMillan crescent is already used for parking for St Claires, St Edmunds and adjacent units and houses. Part of it is the bus route for the 902 and the 56 buses. All

unit development on the other side of Canberra Avenue needs to consider the provision of cars, even this close to the city. It is inappropriate to assume everyone will have equitable access to transport, only have one car per household, or be happy to bike as mobility issues, multi generational living arrangements and multi family households are the norm due to cultural and financial requirements. To rezone Sections 87 and 84 and develop them in addition the East Lake Place will make parking and traffic far worse than it already is.

There is an emergency services station on Dalby St, within the proposed precinct. The noise generated by these vehicles leaving through 8-15 storey developments flanking this road would be amplified, adding to potentially uncomfortable levels of road sound. You only need to spend a night in a hotel on a main road in Sydney or Melbourne to know how this will feel. With increased traffic through this space the ability of the emergency vehicles to navigate these paths and service the maximum height of any proposed buildings with their fire appliance fleet needs consultation.

Lastly, this planning needs to bring forward the Barton to Fyshwick stage of the light rail project in order to cope with over 5000 new people within 5-10 years. We also note that this light rail path is not reflected well on the map copied from the East Lake Place plan shown on page 13 of the background paper – it may have been miscoloured brown instead of grey.

**We would like to conclude by thanking you for reading this response. Our request is to please remove Sections 84 and 87 from this rezoning and reduce building height to something in keeping with the surroundings. Please also consider the embodied carbon within existing structurally sound residential buildings and established trees, along with preservation of intangible value and existing social / community cohesion in the precinct.**

**The planning and environmental cost of leaving Sections 84 and 87 unchanged from rezoning will be minimal. To rezone these established homes will result in a substantial social and personal cost to existing homeowners and residents.**

Thank you again,

**Natalie Ison and Michael Roberts**

## Submission on Draft Amendment 102 to the National Capital Plan – Hume Circle Precinct

Thank you for the opportunity to comment on Draft Amendment 102 to the National Capital Plan – Hume Circle Precinct, proposed by the National Capital Authority (NCA).

We broadly support the intention to revitalise the Hume Circle Precinct and recognise the benefits that thoughtful redevelopment can bring, including increased housing supply and a more vibrant neighbourhood.

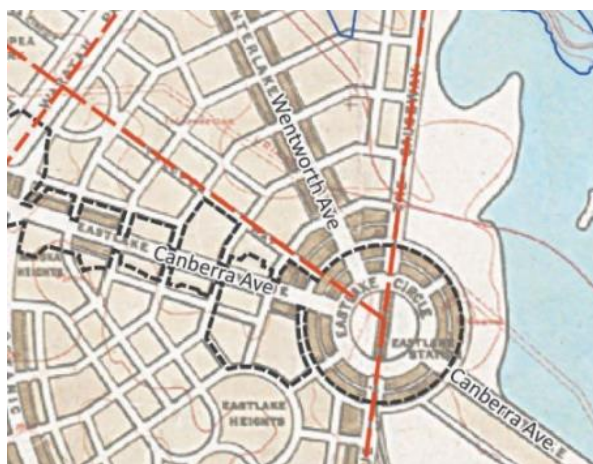
However, we have significant concerns about aspects of the proposal. We believe important changes are required to Draft Amendment 102 to ensure the precinct develops in a way that is consistent with Canberra's heritage, environmental values, and existing community character.

These issues are outlined below and warrant reconsideration to ensure alignment with the National Capital Plan, the Griffin Legacy principles, and established streetscape.

### 1. Consistency with the Griffin Plan

Two rationales are outlined in the [Background Paper](#) for the amendment. The first is to acknowledge Hume Circle as an entry point to Canberra and to align it with the original intentions under the Griffin Plan.

**The revised plan does not align with Griffin's original vision for Eastlake.**



The proposed built-form framework is inconsistent with the spatial structure in the Griffin Plan. Under the Griffin design, the Eastlake roundabout is framed by open space and water for half of its circumference, maintaining a scenic, natural landscape and visual permeability.

Draft Amendment 102 proposes high-density development around approximately three-quarters of the precinct, materially altering the intended balance between built form and open space.

The proposed Draft Amendment 102 also refers to maintaining key view lines. However, the proposed height envelope—particularly buildings up to fifteen storeys—appears incompatible with the stated objective of preserving key view corridors.

Built form of this scale would obstruct the axial views referenced in the amendment documentation, undermining both heritage values and the legibility of the Griffin geometry. This raises questions about whether the proposed height framework is compatible with the heritage principles the amendment claims to uphold.

The proposed Draft Amendment also fails to consider the impact of significant additional car traffic that would be introduced to an already very busy system of major arterial roads (Canberra Ave; Wentworth Ave; and Sturt Ave) and the Hume Place roundabout itself.

## **2. Existing Housing Diversity and Social Outcomes**

The second rationale for Draft Amendment 102 is to increase housing supply, including low-cost housing, in line with the government's stated ambitions. We agree that greater housing supply is needed to ensure housing equality into the future and support the government's aims in this regard.

**However, we believe the proposed amendment will not increase housing diversity and will in fact push out the existing low-cost housing that currently exists within the McMillan Crescent extension.**

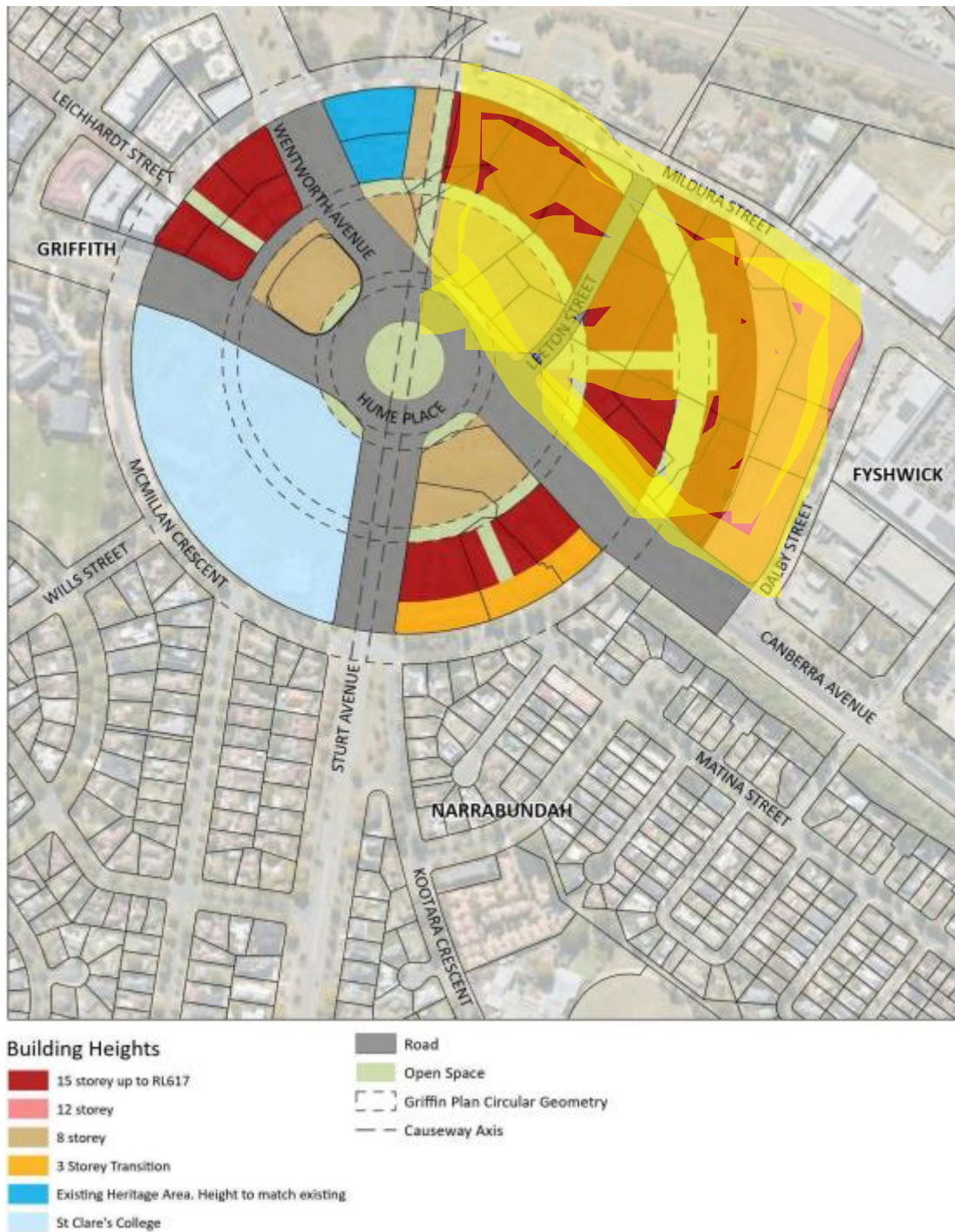
The McMillan Crescent extension already provides a diverse mix of housing, including homeowners, young families, renters, students, and residents in emergency and public housing. This area is one of the few genuinely mixed-tenure and affordable pockets within an otherwise expensive suburb. Staffordshire Terrace alone comprises 110 apartments ranging from one bed through to three bed townhouses.

The extensive redevelopment proposed risks displacing existing residents and increasing housing costs, undermining the social diversity that already exists. The proposal does not adequately address how affordability, property values or tenant protections would be maintained.

Redevelopment at the scale proposed will likely:

- Displace existing residents and reduce the values of residences within the shadows of the tower blocks, further disadvantaging the owners of low-cost housing.
- Reduce the availability of existing affordable housing within the McMillan Crescent extension.
- Increase overall housing costs due to redevelopment uplift.

Draft Amendment 102 does not provide a clear mechanism to retain or enhance affordability outcomes, nor does it address the social impacts of redevelopment on existing communities.



**Housing supply could still be increased by exempting the McMillan Crescent Extension and focusing development in Hume Circle Precinct areas without existing housing.** For example, in the diagram above, high-density housing could be developed only in the highlighted section which is currently light industrial – that is, on the Kingston and Fyshwick sides of Canberra Avenue. Canberra Avenue would act as a natural buffer to the issues of overlook of the 15-storey buildings. In this example, housing supply is increased, fidelity to the Griffin Plan is maintained (at least with more open space around Hume Circle) as is the residential character of the McMillan Crescent extension.

### 3. Environmental and Urban-Design Impacts on the McMillan Crescent Extension

Including the McMillan Crescent extension within the designated area would have negative consequences for both the natural environment and the established neighbourhood character. This raises several planning concerns:

- **Environmental values:** The existing green spaces support established habitat for native bird species, including gang-gang cockatoos, spotted pardalotes, king parrots, and eastern rosellas. Increased development intensity would reduce habitat continuity and diminish ecological function.
- **Neighbourhood character:** The current streetscape is defined by low-rise residential buildings, mature vegetation, and a fine-grain urban form. The proposed built form is not in line with the existing neighbourhood; introducing mid- or high-rise development would be inconsistent with the prevailing character and scale.
- **Amenity impacts:** High-rise development would overlook nearby homes, reducing privacy and altering the human scale of the streetscape.

The McMillan Crescent extension is not an appropriate location for the level of intensification proposed.

### 4. Lack of consultation by the NCA

The NCA have provided information on Draft Amendment 102 on their website in the form of a document outlining the amendments and a background paper. These are useful resources and explain the rationale behind the proposal; however inconsistent the proposed high-rise building heights are to the vision of the Griffin Plan.

However, public consultation on this significant amendment — which will have major impacts on nearby residents — has been very limited. No public meeting has been held. The window for submissions has been open over a time which is traditionally a holiday period. Draft Amendment 102 has not been widely publicised, only featured in an article in Our Region.

We submitted questions to NCA via their email address provided for this consultation. The questions included information on impact assessments conducted, and stakeholders consulted. NCA did not respond to our stakeholder question, but did provide information on why no impact assessments have been conducted (below):

*DA102 proposes a 2-stage approach to setting planning and design controls for the Hume Circle Precinct. The first stage, being the draft Amendment, includes the Precinct within Designated Areas of the National Capital Plan (the NCP) and introduces a new Precinct Code into the NCP. The draft Precinct Code defines the extent of the precinct, proposes a land use framework and establishes building heights.*

*The draft Precinct Code includes a requirement that ‘detailed conditions of planning, design and development’, which are subject to public consultation and the approval of the NCA board, be prepared in advance of any works proposals being submitted to the NCA for consideration. The range of matters to be addressed in the detailed conditions is detailed in the draft Precinct Code.*

*The draft amendment does not propose a particular development, instead sets the planning framework enabling future development to occur. The second stage of planning described above, as well as detailed development proposals, will need to be supported by a range of studies addressing community and social impacts, environmental matters, heritage (as relevant), etc.*

While this email sets out the process, we do not understand why NCA would propose Draft Amendment 102 without conducting impact assessments. We also do not understand why the NCA is proposing building height form ahead of “detailed conditions of planning, design and development” being developed. Both observations indicate that the draft amendment and Precinct Code are considered foregone conclusions. This lacks the transparency that is expected of government.

**We suggest that further public consultation is needed, and that NCA conducts all impact assessments ahead of the final amendment and Precinct Code.**

## **5. Recommendations**

To ensure the precinct develops in a way that respects heritage, protects the environment, and supports the existing community, we recommend the following (in addition to the observations and suggestions above):

### **5.1 Remove the McMillan Crescent Extension from the NCA designated area**

The designated area should be limited to the Fyshwick and Kingston portions of the precinct. This approach would:

- Maintain fidelity to the Griffin Plan, which envisaged at least half of the precinct as open space
- Protect existing ecological values and wildlife habitat
- Preserve the established low-rise streetscape and residential character
- Avoid unnecessary displacement of existing residents and disruption to a diverse and already affordable housing area.

### **5.2 If McMillan Crescent Extension remains included, limit building heights to three storeys**

If it is decided to retain the McMillan Crescent extension within the designated area, the building height framework should be amended to impose a maximum height of **three storeys**. This would:

- Ensure consistency with the established streetscape and neighbourhood character
- Reduce overshadowing and privacy impacts
- Protect view lines and minimise environmental disruption.

## **6. Conclusion**

We support the goal of revitalising the Hume Circle Precinct and the broader objectives of Draft Amendment 102, but the current proposal by NCA requires important adjustments to ensure it remains consistent with Canberra's planning heritage, environmental values, and community needs.

The inclusion and proposed intensification of the McMillan Crescent extension is inconsistent with the Griffin Plan, incompatible with existing neighbourhood character, and likely to generate adverse environmental and social impacts.

Removing the McMillan Crescent extension from the designated area—or significantly reducing allowable building heights—would produce a more balanced and context-responsive planning outcome while still achieving housing supply aims.

Thank you for considering this submission.

Submitted by:

**Fiona Gunn and Greg Doolan**  
**Residents, Staffordshire Terrace apartments**



## Inner South Canberra Community Council

### **NATIONAL CAPITAL PLAN DRAFT AMENDMENT 102 – HUME CIRCLE PRECINCT**

ISCCC Committee Members representing the adjacent resident associations (GNCA, KBRG, ONCC) met with National Capital Authority (NCA) officers on 15 January 2026 to discuss this proposal, which was only advertised in the Canberra Times on 5 January with no notification of affected owners or businesses in the area. The ISCCC had asked for the consultation period closing on 3 February to be extended, preferably until after our first Public Forum of the year on 23 February, given the time of year, the radical and complex nature of the proposals and the need to ensure the local community is well informed. However the NCA Chief Executive, Karen Doran, indicated that was unlikely to be possible and asked that we provide comment or questions on four ‘main matters’ relating to the Draft Amendment, i.e.:

1. Reinstating the Griffin Plan
2. NCA to be the planning authority (to streamline approval processes)
3. The broad development concepts
4. The list of development conditions (set out on the last page of the Amendment document), seen as important to control redevelopment while a detailed precinct plan is prepared.

While continuing to deplore the NCA’s inadequate consultation program, the ISCCC Committee therefore makes an initial submission as follows:

1. **Reinstating the Griffin Plan.** We have no problem in principle with that objective, but we are unconvinced that introducing a potentially large number of apartment buildings up to 15 storeys high in this location is consistent with the ‘Griffin Plan’. We understand that the Griffins generally favoured fairly low-rise built form (except for important public buildings) set in landscape, and ‘Garden City’ principles. We suggest that new buildings in this area should generally not exceed 3 storeys in height south of Canberra Avenue, given that Section 84 Griffith (between Canberra and Sturt Avenues and McMillan Crescent) already contains well over 200 apartments in 2-3 storey buildings which appear to be in very good condition and are unlikely to be available for redevelopment in the foreseeable future. Block 8 Section 84 is well-treed open space, providing good screening of Hume Place for the apartments. This area also directly adjoins the low-rise residential neighbourhood of Narrabundah and higher buildings would impact on the amenity of that area.

We also note that 'The Griffin Legacy' publication (NCA 2004) identifies the 'East Basin Urban Extension' (or 'Renewal Area') and Hume Circle as a 'Principal Urban Improvement Area' (along with Constitution Avenue, City Hill, West Basin and the Parliamentary Zone). As well, the ACT Government's 'Inner South District Strategy 2023' shows the 'East Lake' area as the prime 'key site and change area' for development, extending all the way down to the north-eastern frontages of Wentworth and Canberra Avenues, including most of the sites now proposed by the NCA for redevelopment. Why then has the NCA chosen to deal with Hume Circle in isolation, particularly since we understand one of the main drivers for this proposal is delivering on the federal government's housing agenda?

We also wonder why Figure 147 of the Draft Amendment shows a narrow '8 storey' band adjacent to the 'Existing Heritage Area' (the old dairy) and a narrow strip of 'Open Space' along The Causeway axis rather than the full width of The Causeway/ visual extension being shown as 'Open Space'? Recognising The Causeway/ Sturt Avenue axis as a principal element of the Griffin Plan is surely one of most important opportunities of the Draft Amendment.

2. **NCA to be the planning authority.** We agree this could help streamline approval processes and could yield better results than the ACT planners, if the NCA is less driven by developers' interests. However, the delivery of the NCA's plan, which requires quite radical change to the existing subdivision pattern of the area and is likely to conflict with some current redevelopment intentions, appears to rely solely on the private sector. Is this why such large buildings are proposed, to give developers significant incentives but which may result in excessively dense projects, such as has happened in Woden Town Centre in recent years? This may also impact adversely on adjacent sites, such as Fyshwick Markets, and create pressure to redevelop those with the loss of important local facilities. As suggested above, if the NCA wishes to take on the planning responsibility for this area it should also assume control of the 'East Basin Urban Extension' (or 'Renewal Area'), as shown in its 'Griffin Legacy' publication. It is critical that this area, including the 'Railway Station Precinct', is planned together with Hume Circle and that vehicular traffic and pedestrian movement across the whole area is comprehensively considered.
3. **The broad development concepts.** We have concerns about a range of matters such as: the scale of development proposed; the potential for increasing urban heating; the need for more public and social housing in the Inner South; the quality of life for residents of the proposed buildings around one of the busiest and most accident-prone intersections in Canberra; impacts on neighbouring development; the lack of proposals to deal with ever-increasing traffic; safety of pedestrians traversing the 'precinct'; and viability of existing commercial premises in the subject area and the adjoining area of Fyshwick.

We note that funds of \$25,200,000 (with the Federal Government contributing roughly half) have been set aside for the [Hume Circle Intersection Improvements | Infrastructure Investment Program](#), for: improved road safety for all road users; reduced congestion and improved travel times; improved accessibility and connectivity of road networks. Who is responsible for the road system and for using the above sum for the purpose described? How will the present arrangement cope with increased traffic of not just cars and trucks but also pedestrians and cyclists where the latter two find it virtually impossible to cross from Sturt Ave to the side of the railway station and the lake at present?

**We reserve further comment on these matters pending much more information about actual development proposals and the proposed ‘detailed precinct plan’.**

- 4. List of matters to be covered by detailed development conditions** (as set out on the last page of the Amendment document). We have generally no issues with this list, but are not convinced that a ‘list of matters to be covered’ will be enough to ensure high-quality redevelopment complying with the NCA’s intentions pending the preparation of its ‘detailed precinct plan’. We would like to see more emphasis on ‘public realm’ matters, including safety and security as well as high quality amenity, and much more tree planting than has been achieved, for example, in recent Kingston Foreshore developments. A specific requirement for public and community housing should also be included.

**Because of the matters raised above we do not believe that the proposed Draft Amendment, particularly ‘Figure 147: Hume Circle Precinct – Building Height framework’ is acceptable. We believe there needs to be a comprehensive, detailed NCA or joint NCA/ACT plan for the whole of the East Basin/ East Lake urban renewal area. Sufficient time and information needs to be given for community consultation on this plan so we can all be assured that the physical outcomes of the project will be of the highest quality and sustainability, befitting this important location in the National Capital.**



## Inner South Canberra Community Council

### **NATIONAL CAPITAL PLAN DRAFT AMENDMENT 102 – HUME CIRCLE PRECINCT**

Submission by the Inner South Canberra Community Council (ISCCC)

The ISCCC makes this second submission, noting that we were not able to meet the revised 17 February 2026 deadline of the National Capital Authority, as we needed to consider and incorporate additional comments made by members of the community at our public forum, addressed by the NCA, on 23 February.

2. In our interim submission of 1 February, we provided initial comments on the NCA's proposal for designation of a new "precinct" around Hume Circle, with associated changes to a number of planning parameters. We confined these comments to four "main issues" defined by the NCA and provided them within the constraints of the original deadline imposed by the NCA, 3 February. We asked for this deadline to be extended beyond the date set for our public forum on the issue, 23 February. The NCA told us "we would also be prepared to accept comments after that date and up to the week of the public forum. This is not a general extension – and so the formal close date will remain 3 February on website etc." Following the ACT Chief Minister's intervention, the NCA subsequently changed the public deadline quoted on their website, but only until 17 February.

3. We now provide these further comments, taking into account additional analysis, information which has come to light subsequent to our initial submission, and the views of local people which have been made known to us in advance of the public forum. We focus on what appear to us to be the "main issues", which do not in important respects correspond with those identified by the NCA.

#### **Lack of transparency and integrity in the consultation process.**

4. The process leading up to the public revelation of the NCA's proposal, including the consultation arrangements, has fallen far short of acceptable standards for a public entity. The proposal was presented to the community as an idea emanating from the NCA and based on principles derived from the plans of Walter Burley Griffin. Subsequent examination of NCA documents revealed that the plans had in reality been developed with commercial interests for more than a year before the announcement was revealed to the community. It appears that one commercial consortium was in fact involved in discussions with the NCA before the NCA had any jurisdiction over the area in question. This requires explanation.

5. The proposal was finally announced to the public in the most low-key manner possible, as a small advertisement in the Canberra Times on 5 January 2026, the first working day after the Christmas / New Year break. Although the ISCCC receives regular notices from the NCA about development issues, we received no notification on this occasion; nor was any sent to local community groups, or to residents of the area designated for the new "precinct", people whose homes were therefore on a path to possible redevelopment and displacement. Less than a month was initially given for comment during the peak holiday period.

6. The only possible conclusion to be drawn is that the NCA did its best to ensure that the plan slipped out unnoticed, and that the community was caught unprepared to offer comment. In devising this plan in secrecy from the local community, but with commercial parties who stand to gain substantially from it, and in seeking to minimise community feedback on it, the NCA has let the community down.

7. We note, from the NCA's own publication "Commitment to Community Engagement" (page 6) "Our community engagement principles" include:

- "Be clear about the scope for people to influence outcomes and where other processes have made recommendations and decisions."
- "Allow sufficient time for the community to participate in consultation processes."
- "Begin engagement at the earliest appropriate stage in the life of a project."

It seems to us that the NCA has failed on multiple grounds to follow its "Commitment" in this matter.

8. The circumstances of these events need a full and honest explanation. The NCA claimed at Commonwealth Senate Estimates on 9 February 2026 that its procedure in this case was no more than a "standard process". If this is the case, the NCA's standard processes need urgent review, as they appear tailored to the needs of developers, with little or no regard for the impact on the community or the views of people directly affected. We should be told why the NCA's process in this case deviated so far from its "Commitment to Community Engagement". More clarity is needed about the relationship between the NCA and the ACT Government.

#### Recommendation 1:

9. The NCA and the ACT Government should provide a complete and frank account of the process by which this proposal was developed, including details of the timeline, any risk assessment undertaken, and the involvement of commercial entities standing to profit from it. The NCA's "standard processes" require urgent review, along with the Authority's organisational values and its relationship with the Canberra community. Its failure to follow its own "Commitment to Community Engagement" needs to be explained. This example suggests that the NCA should focus on its existing responsibilities, and try to do them well, rather than reaching out into new ventures for which it is ill equipped.

#### **The case for a new "precinct"**

10. The NCA has presented no persuasive evidence for the creation of a new precinct, or why this one should be under its control. The ISCCC is aware of other "precinct" proposals in the part of Inner South Canberra bordered by the Kingston Foreshore and Fyshwick West. We have been consulted by the ACT Government about a projected "East Lake" suburb, covering much of this area, on several occasions in recent years. A "place plan" was released some months ago and the community is still awaiting further details. (East Lake is understood to include the undeveloped area from The Causeway, down to Mildura Street, and across to the Jerrabomberra Wetlands.) Then, as recently as 4 November 2025, the ACT Chief Minister, at a press conference to which community organisations were not invited, announced a "Railway Precinct" with some Commonwealth funding.

11. The ISCCC supports the provision of more housing, with community facilities and appropriate commercial development, within the "East Lake" area. However, consecutive announcements of different plans for these overlapping and adjacent areas by the two responsible jurisdictions make it

impossible to assess the likely outcome for the area as a whole, let alone the impact on surrounding areas. Coherence needs to be brought to these diverse proposals so that the community can provide meaningful feedback.

12. The “Hume Circle Precinct” draft Plan amendment 102 should be withdrawn until the two jurisdictions are in a position to present a joined-up plan for the whole of the East Lake area, as originally designated by the ACT Government.

### Recommendation 2

13. The “Hume Circle Precinct” draft amendment 102 should be withdrawn. The NCA and ACT Government should jointly develop a comprehensive, detailed plan for the whole of the East Lake area, including the ‘Hume Circle Precinct’. Adequate time should be allowed for consultation on this plan, so the community can be assured that the outcomes will be of the high quality and sustainability befitting this important location in the National Capital. A full risk assessment should be undertaken and made public. Commercial entities should not be given privileged access to the development of the proposals.

### **Impact on local residents**

14. Many local residents first became aware of the Hume Circle Precinct proposal as a result of an article in the Canberra Times on 21 January 2026. Only then did some residents discover that their homes could be replaced by 15 storey apartment buildings. This was a devastating way for people to learn that they might lose cherished homes which some of them had occupied for many years, or in other cases that their privacy may be destroyed. Other residents whose homes were not in danger of demolition learned nonetheless that their homes might now be overshadowed and overlooked by residents of 15 storey tower blocks. The news was made particularly difficult to bear, when it became clear that commercial interests had been given privileged access to the development of the proposal.

15. Residents are also concerned about the loss of mature trees and local green space, and the lack of consideration for global warming, with the likely creation of new heat islands.

16. The NCA argues that there are no plans in the short term for the acquisition of property. However this ignores the impact on residents of “planning blight”, including uncertainty about their long term rights over homes they previously thought secure, and potential detriment to the value of their properties. At our public forum on 23 February, residents spoke vividly of the distress the NCA’s proposal had caused them.

17. Two petitions have been lodged with the ACT Assembly recording the great concern being experienced by the local residents. Petitioners have called on the Commonwealth Minister to amend the Hume Circle proposal by excluding established low-rise residential complexes and their immediate surrounds, in the area between Sturt Avenue and Canberra Avenue. There seems no good reason for including this area, Section 84 Griffith. It contains well over 200 apartments in 2-3 storey buildings which appear to be in good condition and meet the definition of “missing middle” favoured by the ACT Government. This is also one of the most affordable housing areas within the Inner South. Block 8 Section 84 is well-treed open space, providing good screening from Hume Circle for the apartments.

### Recommendation 3

18. Local residents deserve an apology from the NCA for the way they learned about the “Hume Circle Precinct” and the very limited opportunity they have been given to provide comment on a matter affecting their vital interests. When the revised proposal we have recommended is ready, consultation with local residents should be a priority, not an afterthought.

It should be made clear what protections or support will be available for affected residents, and whether their rateable values may be affected.

### Recommendation 4

19. As requested by affected residents, the proposal should be amended by excluding established low-rise residential complexes and their immediate surrounds, in particular those in Section 84 Griffith between Sturt Avenue and Canberra Avenue. It would also make sense to excise Section 14, comprising the Friday, Abrazo, Indigo and Archer apartments between Leichhardt and Hely Streets, as these are recently built mid-rise apartments which blend in with the neighbourhood, and the St Clare’s College campus, depending on the wishes of the school community. The remainder of the “Hume Circle Precinct” proposal could then be considered as part of the East Lake project as already defined by the ACT Government.

### **Role of the NCA**

20. On examination of the evidence, we see no great advantage in having planning for the “Hume Circle Precinct” managed by the NCA, whose concept of consultation with the community is minimalist, and who appear unduly beholden to commercial interests. But if the NCA wishes to take on the planning responsibility for this area, it should also be given control of the ‘East Basin Urban Extension ’(or ‘Renewal Area’), as shown in its ‘Griffin Legacy ’publication. It is important that this area (including the “Railway Station Precinct”) is planned, together with Hume Circle, that heritage assets are fully protected, and that vehicular traffic and pedestrian movement across the whole area is comprehensively considered and modelled. It should be made clear whether the NCA sees this proposal as a possible precedent for extension of its activities into other areas currently under the control of the ACT Government.

### **Traffic, transport and pedestrian movements.**

21. Designating a stand alone “precinct” around Hume Circle implies an area in which it is easy for pedestrians to move around, such as Braddon. This will be impossible in the designated “Hume Circle Precinct”, which is bisected by four major roads, unless multiple sets of traffic lights are installed. This would add extra delays to what is already a major traffic choke point.

22. The NCA’s proposal is largely silent about its likely impact on traffic movement at what is one of the busiest traffic intersections in Canberra, a roundabout with multiple entry points, having one of the highest accident rates in Canberra. Traffic from suburbs over the NSW border is steadily increasing, while Sturt Avenue, quiet during the day, is a well used “rat run” during the rush hour. The roundabout’s position adjacent to two schools adds to a zone of considerable hazard for students and others in the school communities, as evidenced by the recent tragic incident involving two students crossing Canberra Avenue. At pick up time, the queue of cars for the schools stretches dangerously back into the roundabout. The area is poorly served by public transport, with only one “R” bus route, in addition to some services to Queanbeyan. The light rail seems unlikely to reach this area before the next century, if ever. New residents are therefore more likely to use cars and

bikes than in some other development locations, and there would be a need for vehicular access points to any new high rise developments, adding to the complexity of traffic flows.

#### Recommendation 5

23. If the NCA is to continue managing this project, it should be given control of the whole East Lake place plan area, so that all aspects of the planning for this area, including traffic impacts, can be modelled and integrated. This should include the utilisation of the funds set aside for improvement of this major traffic intersection. However, the NCA will need to demonstrate greater energy and integrity in any future consultation process if the community is to be persuaded of its ability to manage this project responsibly.

#### **The Griffin Legacy, building heights and climate change**

24. It is difficult to regard the claims in the NCA proposal about the Griffin legacy as much more than window dressing. The Griffins certainly left no suggestion of 15 storey buildings anywhere in Canberra, even though the first high rise building, the Home Insurance Building, had been erected in their native Chicago as early as 1885, with other skyscrapers to follow. We understand that the Griffins were of the 'Prairie School' (following Frank Lloyd Wright) and generally favoured fairly low-rise built form (except for important public buildings) set in landscape, and "Garden City" principles.

25. The NCA's own 'The Griffin Legacy' (2004) has a map on page 83 titled 'Griffin Plan 1918 Canberra Avenue Manuka-Hume Circle' showing development in complete concentric rings around Hume Circle with the caption: "areas intended for higher-density terrace form of mixed-use development." This does not give any support for 12-15 storey towers in this area. This map shows the railway station in the middle of the roundabout, with tram lines around the circle and radiating off in the medians of Canberra and (now) Wentworth Avenues. The caption says: "Hume Circle was intended as a major urban node, with interchange between rail and tram". Unfortunately, we now have neither in this location, further reducing the case for Hume Circle to be a major activity hub.

26. The NCA has provided no evidence to support its proposal to allow 12-15 storey buildings over a large part of the NCA's intended 'designated area'. This is an inappropriate way to "reinstate the Griffin Plan" and is likely to lead to poor environmental outcomes and amenity for residents, as well as to exacerbate already serious vehicular traffic and pedestrian movement issues. Some redevelopments up to say eight storeys could take place north of Canberra Avenue, but The Causeway axis should be retained as well-treed open space for the full width of The Causeway and Sturt Avenue. It is notable that the southern side of Canberra Avenue (opposite Fyshwick) contains a continuous belt of magnificent trees, extending right to Hume Circle and including the roundabout island itself, which we believe the Griffins would have thoroughly approved of (rather than 15 storey buildings).

27. In any case, how many "gateways" does Canberra need? The ACT Government is promoting the Yarra Glen / Woden area as a Southern Gateway, and there seems no need for another "Gateway" marked by high rise buildings. We have detected no support within the community for 15 storey tower blocks in this area, which adjoins the low-rise residential neighbourhood of Narrabundah. Higher buildings would impact on the amenity of that area. Existing high rise apartment buildings in Kingston are too far away to have any relevance to the NCA's proposal. They were approved under a short lived NCDC redevelopment plan in the 1980s and remain somewhat controversial.

28. Consistent with the character of adjoining parts of the Inner South, and to avoid overshadowing, we believe new buildings in this area should generally not exceed three storeys in height south of Canberra Avenue. Planning should take full account of the increasing consequences of global warming. Limiting building heights will help to offset likely heat island effects of new buildings, while every effort should be made to retain existing green space, including mature trees, and garden plantings around existing residences. Opportunities should be found to plant additional trees.

#### Recommendation 6

29. Buildings in the designated Hume Circle area should not exceed three to four storeys in height South of Canberra Avenue, or eight in other parts of the East Lake place plan. Detailed landscaping plans should take full account of the need to preserve existing trees and green space wherever possible and minimise urban heat island effects. The plans should retain or replace existing green space and mature trees, and identify opportunities for new tree plantings. East Lake could provide a showcase of climate resilient development and world class Australian design.

#### **Conclusion**

30. The launch and consultation process for the “Hume Circle Precinct” is one of the worst we have seen from a Government entity affecting our area in recent years. We have asked for an apology from the NCA to the local community and for the proposal to be reformulated on the lines of the previous East Lake place plan. We are in favour of new housing and sensible commercial development in the East Lake area, but do not see in the NCA’s proposal any valuable contribution to the way of achieving this. Our recommendations are addressed to the NCA, the ACT Government and the Commonwealth Minister for Territories. This submission is being copied to Ms Alicia Payne MP as well as to Senators Gallagher and Pocock, and MLAs for the Kurrajong ACT electorate.

Colin Walters  
Chair  
Inner South Canberra Community Council  
25 February 2026

# **Submission on National Capital Plan Draft Amendment 102 – Hume Circle Precinct**

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I write to express significant concerns about Draft Amendment 102 and to oppose its approval in its current form.

## **Misrepresentation of the Griffin vision**

The proposal claims to align with Walter Burley Griffin's vision for Canberra as a garden city. However, the Griffins' plan specifically envisaged "two rows of medium density mixed-used development" at Hume Circle. Fifteen-storey apartment towers cannot reasonably be characterised as medium density development. This misrepresentation of foundational planning principles to justify high-rise development is inappropriate and undermines the credibility of the proposal.

## **Jurisdictional concerns and erosion of resident rights**

The designation of this precinct under exclusive NCA authority removes all planning oversight from the ACT government and eliminates legal avenues for residents to challenge development decisions. While the NCA has a legitimate role in matters of national capital significance, this amendment does not adequately justify why this particular precinct warrants such exceptional treatment. The outcomes sought could be achieved through existing ACT planning legislation, which provides appropriate community consultation and appeal rights.

## **Inadequate consultation process**

The consultation documentation lacks meaningful detail regarding:

- Traffic impact assessments for an already congested area
- Shadow and environmental impact studies
- Plans for existing businesses within the precinct
- Detailed design guidelines and controls

The community has been given insufficient time to properly review and respond to this significant proposal. This does not constitute genuine community engagement.

**Recommendation**

This amendment should not proceed without:

1. Comprehensive justification for NCA oversight rather than ACT planning processes
2. Detailed impact assessments (traffic, environmental, business, social)
3. Building height limits genuinely consistent with medium-density development
4. An extended consultation period with substantive documentation
5. Retention of community appeal rights

I urge the NCA to withdraw this amendment and undertake a more thorough and transparent planning process.

Regards

Andrew Remely

## **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

To the Chief Planner,

I am writing to formally lodge my submission regarding Draft Amendment 102 (DA102) – Hume Circle Precinct. As a resident (homeowner) of Narrabundah since 1992, I have significant concerns regarding the scale and impact of the proposed changes.

While I support the principle of urban renewal, I oppose the current draft for the following reasons:

1 Inappropriate Scale and Height: The proposal for 15-storey buildings is inconsistent with the character of the surrounding established residential areas. Such height will lead to significant overshadowing and a loss of privacy for existing residents.

2 Impact on Established Residences: I am specifically concerned about the lack of protection for established low-rise complexes like Staffordshire Terrace. These should be excluded from the high-density rezoning to preserve the existing community and residential amenity.

3 Infrastructure and Traffic: The "completion of the circle" and the resulting increase in density will put immense pressure on local roads (Canberra, Sturt, and Wentworth Avenues) and public services that are already at capacity.

4 Process and Transparency: I echo the community's concerns regarding the level of consultation and the influence of commercial interests in the development of this plan. A more thorough assessment of the social and environmental impacts on current households is required before proceeding.

Requested Action: I ask that the NCA pauses the current process to conduct a more detailed social impact study and amends DA102 to exclude established low-rise residential complexes from the high-density footprint.

I hereby consent to my name being published alongside this submission on the NCA website.

Yours sincerely,

Peter Newman

I am writing with my objection to this rezoning. I object to the rezoning of three apartment complexes on McMillan avenue which are home to hundreds of ACT residents. I do not object to the rezoning of the commercial area.

-This proposal threatens hundreds of residents security and reasonable enjoyment of their homes through the threat of 'redevelopment' and exercise of power from the federal government under the justification of 'national interest'.

-This will devalue hundreds of people's homes - the sale of such homes will also be compromised with future development of the site looming under the banner of 'opportunity'.

-This will disrupt the reasonable enjoyment of the residents of this area if they are to have such major construction works in the area.

-This roundabout is already congested and it serves as the main entry point to Canberra from residents of NSW-this proposal will cause major traffic issues-this area of Canberra Avenue is already problematic for traffic accidents.

-The schools are at capacity and the residents children will have their education compromised if the proposal to build high rise apartments in the area goes ahead. Anywhere such large numbers of apartments are planned must also have the space for a school-and this area does not.

-As recently as August 2024 the ACT Planning department gave assurances to the residents of this area that they would not have their area rezoned or redeveloped in future and granted a 99 year lease to the residents (at a cost of approx 15000 dollars).

-Other-To be implying that this is the 'original Griffins plan' for Canberra and therefore we must comply with a private company building high rise buildings in the area is just absurd-this refers to a design that is more than a hundred years old I believe made prior to even the commonality of cars on the roads in Australia.

Regards

*Submitter Name Withheld*



Mr. Andrew Smith  
Chief Planner  
National Capital Authority  
[draft.amendment@nca.gov.au](mailto:draft.amendment@nca.gov.au)

cc Ms Kristi McBain, MP, Minister for Regional Development, Local Government and Territories, [Kristy.McBain.MP@aph.gov.au](mailto:Kristy.McBain.MP@aph.gov.au)

Ms Alicia Payne, MP, [Alicia.Payne.MP@aph.gov.au](mailto:Alicia.Payne.MP@aph.gov.au)

Senator David Pocock, [Senator.David.Pocock@aph.gov.au](mailto:Senator.David.Pocock@aph.gov.au)

Mr Chris Steel, MLA, Minister for Planning, [steel@act.gov.au](mailto:steel@act.gov.au)

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Dear planners and others,

## **NATIONAL CAPITAL DRAFT PLAN AMENDMENT 102 – HUME CIRCLE PRECINCT**

1. The Griffith Narrabundah Community Association (GNCA) welcomes the opportunity to comment on this issue. On 3 February 2026 the GNCA lodged an interim submission in relation to the NCA Draft Plan Amendment 102 – Hume Circle Precinct, which foreshadowed a fuller submission by the then extended closing date of 17 February.
2. This is that fuller submission, and gives the GNCA's assessment of the issues raised by the NCA's Draft Plan Amendment 102, and makes recommendations for action by both the NCA and the ACT Government. Those interested in the background to these views are urged to read the attached Discussion at Attachment A.
3. Before we go further the GNCA wishes to record its extreme disappointment with the conduct of the NCA's consultation over Amendment 102. This was organised at an inconvenient time with a compressed timeframe<sup>1</sup> to fit a tight schedule created by the NCA itself. But as we now know, the proposal has been in the works for 3 years, so what is the rush? Many will think this was motivated by a desire to minimise public attention. This is inconsistent with the NCA's declared principles, and casts doubt on the NCA's good faith in dealing with the public.

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<sup>1</sup> The consultation was advertised on Monday 5 January, the day Government offices reopened after the Christmas/New Year shutdown, and in the middle of the summer break for most Australians. Consultation was to close on 3 February, and was only extended to 17 February after an appeal from the ACT Chief Minister.

4. Between the initial 3 February 2026 closing date for consultation and the later extended date of 17 February it has become clear that the proposal to expand NCA control over the blocks surrounding Hume Place was not, as had been presented at a meeting with the NCA on 15 January, an idea that arose entirely within the NCA, but that it was something that had been discussed with at least some property developers over the past three years. This entirely changes the optics of the proposal, and raises a number of issues about probity and governance.
5. The GNCA notes that were the proposed precinct to be developed to its maximum extent, it is likely that it would involve roughly 9,400 apartments housing roughly 19,000 people with roughly 14,000 cars. We would welcome more accurate estimates from the NCA, together with the underlying assumptions, but believe that such an analysis may not have been made. Whatever the actual numbers clearly this is not a trivial endeavour and raises serious concerns about its likely impact.
6. The GNCA finds the justifications for the proposal put forward by the NCA completely unconvincing. Even if there were valid reasons for the redevelopment of those blocks north of Wentworth and Canberra Avenues, the inclusion of those already developed blocks south of these avenues is unnecessary and at best cynical. It might be that this area was included to give the proposal an association with the Griffin's vision for Eastlake Circle and its surrounds, and possibly as an opening gambit to have something to give up in subsequent negotiations. Unfortunately it has been the cause of much anxiety and distress among the residents of this area.
7. The GNCA believes that Draft Amendment 102 should be withdrawn by the NCA.
8. Where the NCA feels that there is sufficient cause to become involved in planning a precinct, it should issue an overlay to be complied with, on top of any planning controls applied by the ACT. The Commonwealth chose to withdraw from administration of the ACT in 1989 because the costs and administrative burden of providing municipal and state government level services did not sit well with its role as a national government. Irrespective of the NCA's views, why the Commonwealth would wish to reopen this issue is not clear. The GNCA believes that it would not be a good idea to have two jurisdictions with independent planning authority over adjacent parts of the ACT.
9. The GNCA believes that the possible redevelopment of the blocks north of Wentworth and Canberra Avenues should be undertaken by the ACT Government, in conjunction with planning for the adjacent areas of Causeway, the rail yards and Eastlake. With good planning it might be possible to disperse this large additional population over a wider area with lower rise and less intrusive developments. Purely by way of example, the GNCA notes that developing that portion of the proposed Hume Circle precinct north of Wentworth and Canberra Avenues to 7-storeys, the typical height for existing developments in that portion of

Griffith between Canberra and Wentworth Avenues, would result in a population of about 7,500 and a car parking requirement of about 5,635 spaces.

10. The GNCA notes that a full-scale redevelopment of the blocks south and west of Dalby St and Mildura St. might imperil the food industry focus of the West Fyshwick Industrial Area, including the Fyshwick Markets, unless this is well managed, well planned and with strong community and business engagement.
11. The GNCA notes approval by the Minister of this proposal from the NCA would set a very dangerous precedent for the ACT, threatening its planning powers and its ability to collect revenue through lease betterment fees. This is particularly so if NCA control means that ACT Planning rules and lease controls no longer apply to a NCA precinct.
12. The GNCA remains unconvinced that the *Australian Capital Territory (Planning and Land Management) Act 1988* (the Act) really does give the NCA the power to unilaterally take over the planning of any portion of Canberra adjacent to an approach route. If it had been the intention of the drafters of the Act that the NCA undertake general property development not associated with national purposes, then surely Authority would have been called something like the National Capital and Development Authority or NCDA. The GNCA would welcome the NCA releasing any legal advice that it has in this regard about its powers under the Act.
13. The GNCA believes that the NCA does not fully appreciate the magnitude of the task it proposes to embark upon, does not have the necessary skilled staff it would need to undertake its expanded role, and is unlikely to be granted the funds by the Commonwealth to make good these shortfalls.

## RECOMMENDATIONS

The GNCA recommends that:

- 1) The NCA should immediately withdraw Draft Amendment 102 to the National Capital Plan;
- 2) All of Narrabundah, and those areas of Griffith and Kingston south of Canberra and Wentworth Avenues should not be included in any future NCA and ACT redevelopment plans;
- 3) The NCA should immediately commence open and public discussions with the ACT Government and its planning bodies about the redevelopment of the Griffith Industrial Area<sup>2</sup> and the West Fyshwick Industrial Area<sup>3</sup>, in conjunction with ACT development plans for the railway yards, Causeway and East Lake;
- 4) Any future planning by the NCA and the ACT relating to the Hume Circle area identify all the physical and social infrastructure required to support the proposed level of development, and develop detailed explanations of how such infrastructure is to be provided and how it will be funded;

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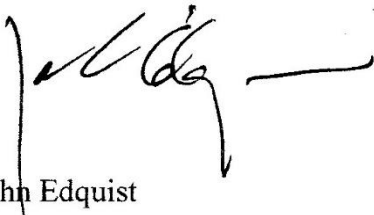
<sup>2</sup> See the Griffith Precinct Map and Code

<sup>3</sup> See the Fyshwick Precinct Map and Code

- 5) Both the NCA and the ACT Government and Planning Authority keep the ACT public fully informed about all developments in contemplation in relation to Hume Circle, Causeway, the railway yards and Eastlake;
- 6) Any unsolicited development proposal received by the NCA be reported to the public within 7 days of receipt;
- 7) The NCA immediately publish any legal advice in its possession relating to:
  - a) its powers to expand its area of jurisdiction adjacent to main avenues and routes of approach; and
  - b) how the NCA should properly respond after receipt of an unsolicited development proposal;
- 8) The NCA appoint an independent consultant as Integrity Auditor to investigate whether there have been any breaches of probity or proper governance in relation to the Hume Circle Precinct proposal, and in particular:
  - a) whether the NCA should have revealed to the public its prior discussions with developers before releasing Draft Amendment 102 for public consultation;
  - b) whether the proposal is an Unsolicited Proposal, and whether the correct ACT and/or Commonwealth procedures been followed; and
  - c) what actions should be undertaken by the NCA to ensure that any probity and governance failure identified do not recur;
- 9) The NCA publish and fully implement all recommendations arising from this investigation;
- 10) The ACT should make inquiries to establish whether:
  - a. The NCA has the authority to undertake a general planning role over blocks with no national significance, and particularly over those which have no frontage on to Canberra Avenue;
  - b. Implementation of the proposal could lead to a loss to the Territory of Lease Variation Charge (LVC), or other revenues.

A discussion of these issues is attached art ATTACHMENT A.

Yours sincerely



John Edquist

President

GNCA

[info@gnca.org.au](mailto:info@gnca.org.au)

15 February 2026

## **DISCUSSION**

### **Summary of the proposal**

14. Amongst the Designated Areas that the NCA has responsible for are “the Main Avenues and Approach Routes between the ACT border and the Central National Area.” This includes Canberra Avenue in its role as a route of approach to the Parliamentary Triangle. This power has been used to control the set-back, building height, and façade of buildings fronting on such main avenues (albeit ineffectively in relation to Manuka Circle).
15. On 5 January 2026 the NCA released “Draft Amendment 102 Hume Circle Precinct” (Amendment 102 document), which proposed to amend the National Capital Plan to give the NCA planning control over not just the front of blocks facing onto an “approach route” but to dramatically expand this into a precinct covering all land between the centre of Hume Pl and:
- McMillan Crescent south of Canberra Ave.
  - East of the northeast running arm of Leichhardt St, and 113 and 115 Canberra Ave.
  - South of Mildura St and West of Dalby Ave.
- and to impose circular zones of various permitted building heights to emphasise the Griffin’s original plan, while leaving a clear sight-way up the Causeway toward Mt Ainslie. The NCA did not propose to acquire any land, and any block amalgamations and other land changes were to be done by present or future landowners.

### **NCA’s justification for proposal**

16. The justification for this proposal was “the renewal of an existing urban area in a manner consistent with the Griffins’ Plan for Canberra and to improve housing supply supporting the national agenda”.
17. The Australian Capital Territory (Planning and Land Management) Act 1988 gave the NCA a quite specific role “to prepare and administer a National Capital Plan” The plan advises that “Designated Areas” exist to enable three roles: Canberra’s role as the National Capital with national functions; the Griffins symbolic design for Canberra; and Canberra’s landscape setting and layout as the “Bush Capital”.
18. While it may be that both the current Commonwealth and Territory Governments are keen to encourage increased housing density this is a relatively transient phase which will abate as immigration declines with falling global population. There are no aspects of a proposal to construct high rise residential towers around Hume Place that have a uniquely national character. This would merely be a re-enactment of developments visible in other parts of Australia and many overseas countries. Future generations would be very critical of those who trashed the Garden City for such little gain.

19. The NCA's Amendment 102 document explains and tries to justify the proposed amendment. The document invokes Walter Griffin's 1918 writings to suggest that the Griffin's envisaged Eastbourne Circle (Hume Circle) would be a "major gateway and activity hub, and to link the area to the city through a scenic rail approach route along the Causeway" and indicates that "(t)here is opportunity to reestablish the original Griffin intent" through introducing for Hume Place "a planning and design framework that provides a memorable and distinctive sense of arrival for visitors as well as for people who pass through daily. As an approach route that leads into the National Capital, it serves as a symbolic gateway experience for those arriving at the city."
20. Given the many major developments that have occurred in the 108 years since Griffin wrote about his hopes for Eastlake Circle, in an as yet inchoate national capital, it is hard to see why Hume Place has been singled out as the starting point of a reimposition of Griffin's dreams on Canberra as it has developed in reality. Wenworth (Interlake) Avenue does not link two lakes, neither does the Causeway conduct a scenic train line across the lake to the civic centre. If Hume Circle is a gateway, it is to the industrial suburbs of Fyshwick and Beard, and Canberra's exurbs of Queanbeyan, Jerrabomberra, and Bungendore, and the Far South Coast.
21. Neither the Causeway sight line nor the arcs completing the circle sketched in part by McMillan Crescent, the stub end of Leichhardt St, and the start of Mildura St, or the inner circle suggested by Hely St, will be roads, but merely grassed open areas. It seems likely that that these hints at Griffin's circular geometry would not be particularly visible at ground level because of the surrounding 12 and 15 storey developments and it may be only apparent from the air. Furthermore, the revelation that the NCA has been engaged in discussions with a development consortium about the rezoning of this area for the last three years suggests that invoking the Griffins' memory and dreams is just a smokescreen.
22. The GNCA finds the justifications for the proposal put forward by the NCA completely unconvincing. The Amendment 102 document was an opportunity for the NCA to explain how the proposed development was a suitable location for the high-rise developments proposed, but apart from noting the ACT Government's enthusiasm for higher density developments, singularly fails to do so.
23. The GNCA believes that the possible redevelopment of the blocks north of Wentworth and Canberra Avenues should be undertaken by the ACT Government, in conjunction with planning for the adjacent areas Causeway, the rail yards and Eastlake.

### The Precinct: Facts and Figures

24. The proposed precinct comprises 33 blocks with an area of 204,684 m<sup>2</sup>, or 20.5 ha. There are 22 blocks north of Wentworth and Canberra Avenues with an area of 112,683 m<sup>2</sup> or 11.3 ha, while there are only 11 blocks in the southern sector with an area of 92,001 m<sup>2</sup> or 9.2 ha.
25. Current land use in the precinct is quite varied. There is 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 which it would seem logical to plan to redevelop in coordination with the ACT Governments plans for East Lake, Causeway and the former rail yards.
26. 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 Aves are zoned CZ2 Commercial Zone but have 2, 3 and 4 storey apartments. Residential use is one of the permitted uses in the CZ2 zoning. Two of the blocks in this area were previously occupied by a motel and a hotel. The area between Sturt and Canberra Aves is zoned CF (Community Facilities) and is occupied by St Clare's College. The blocks east of Leichhardt St and south of Wentworth Ave. are zoned CZ2 and are 4, 6 and 7 storey apartment buildings, and the 2 storey Ramada Diplomat Hotel.
27. There are 546 apartments in the area south of Wentworth and Canberra Aves, suggesting the resident population would be about 1,100 people. The area can scarcely be described as being in need of renewal. On the south side the Griffin legacy of the sightline to Mt Ainslie (straight up Sturt Ave.) and the circular geometry of McMillan Crescent is clearly visible, suggesting that the invocation of the Griffin plan is nothing more than a ritualistic invocation of a respected founder figure. The benefits of including this area in the proposed precinct is hard to see, as the only beneficiaries would be those developers who managed to aggregate a sufficient holding in any of the apartment complexes to eventually build a 12 or 15 storey building.
28. The blocks north of Wentworth and Canberra Aves are zoned CZ2 if facing Hume Circle or Canberra Avenues to about halfway between Leeton and Dalby Streets. Blocks further to the east on Canberra Ave, and those not fronting on to it, are IZ2 (Industrial Mixed Use) but are either one or two storey industrial or commercial structures or 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. The estimated residential population would consequently be 2.

### Possible Threat to the Canberra Markets?

29. IZ2's Zone Objective L refers explicitly to the West Fyshwick Industrial Area, and aims to encourage the area's "role in food processing, wholesaling, distribution and marketing". In

addition, we note that multi-unit residential use is prohibited in IZ2, so that absent of a significant change to the Territory Plan, these IZ2 blocks could not be redeveloped as residential towers. Such a change in the plan would require a reversal of a long-standing commitment to the role of food associated activities in the West Fyshwick Industrial Area. While the Fyshwick Markets lie just outside the proposed precinct boundary running along Dalby St, the Zone Objective covers the whole of West Fyshwick to Jerrabomberra Creek to the east, and applies to retail outlets outside the proposed Hume Circle precinct such as the Fyshwick Markets and Jim Murphy's Market Cellars.

30. The zoning for the Territory Plan's West Fyshwick Industrial Area could not be changed without impacting such businesses. Transference to the NCA of planning control over West Fyshwick west of Dalby St would remove the need for a contentious and possibly troublesome zoning change, if the ACT Government had already come to the conclusion that redevelopment of this area for multi-unit residential use was a desirable outcome. What the long-term impact on the Fyshwick Markets of a hedge of 12-story residential towers across Dalby St is not clear, but the GNCA is of the view that Territory planning for the future of the West Fyshwick Industrial Area should aim to maintain this desirable mix of retail outlets over the longer term.

### **Implications of the Proposal**

31. The building heights proposed for the various segments of the precinct are indicated in Figure 147 (at p.25) in the NCA's Amendment 102 document. Back of the envelope calculations based on this plan suggest total areas of 6,060m<sup>2</sup> for 3-storey developments, 35,980m<sup>2</sup> for 8-storey developments, 26,270m<sup>2</sup> of 12-storey developments, and 90,050m<sup>2</sup> for 15-storey developments. This totals to 158,360m<sup>2</sup>, close to the area of 158,353m<sup>2</sup> for the blocks in the precinct after excluding the St Clare's site, suggesting these estimates are reasonable.
32. How many apartments might we expect to see built on this area? The area between Leichhardt St and Hely St is fully developed with apartment blocks, and the average area per apartment (ie the area of the site multiplied by the number of storeys divided by the number of apartments) is about 210m<sup>2</sup>. Using this number, we can estimate that when fully developed the precinct will have about<sup>4</sup>:
- 9,390 apartments (about 90 in the 3-storey transition zone, 1,370 in the 8-storey zones, 1,500 in the 12-storey area along Dalby and Mildura Streets, and 6,430 in the 15-storey zones);
  - If each apartment had 2 residents the population would be 18,780, say 19,000; and
  - A requirement for parking for 14,086 vehicles.

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<sup>4</sup> These are the most likely figures. We can arrive at a plausible maximum possible number if we assume that developed can increase the density so that there is one apartment per 140m<sup>2</sup>, or half the site space available with the minimum 2-bedroom apartment size of 70m<sup>2</sup>. This yields a maximum of 14,085 apartments with a maximum population of 28,170, and 21,129 cars.

33. We would welcome any refinement of these estimates from the NCA or the Jega Consortium, together with the assumptions that these are based on.
34. On the figures above the proposal would effectively increase by one and a half the population of the inner south (to considerably more than Woden, but still less than north Canberra) and increase the number of cars by 70%<sup>5</sup>. Even if the above estimates are an overestimate, the development would be the equivalent of adding several additional suburbs to the inner south<sup>6</sup>. At the very least there would be a need for probably one new high school, at least one new primary school, new preschools, and an increase in local retail outlets. Given how intensively it is proposed to develop the precinct these supporting facilities would have to be located outside, but close to, the precinct.
35. This proposal would clearly 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 surge 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.

#### **Does the NCA have the authority to assert control over this precinct?**

36. The Australian Capital Territory (Planning and Land Management) Act 1988 gives the NCA the power to amend the National Capital Plan (s.23) but it is by no means clear that the Authority's control over "Main Avenues and Approach Routes" extends over anything behind the façade<sup>7</sup> of any buildings fronting onto any route declared a Designated Route, let alone blocks which have no frontage onto such a designated route, such as those fronting onto Wentworth Ave (see below), Hely St, Leichhardt St, Mildura St, Dalby St, and McMillan Crescent. This is particularly so with Mildura St, which runs off Wentworth Ave but does not connect with Canberra Ave. until close to where Canberra Ave crosses Jerrabomberra (Milla) Creek, about 850m from Hume Circle.
37. The GNCA also notes that while the National Capital Plan, under paragraph 4.15 Main Avenues and Approach Routes Precinct Code 4.15.1 Precinct Location, lists Canberra Avenue west of Hume Circle as a "Main Avenue" and east of Hume Circle as an "Approach Route", Wentworth Avenue appears on neither list. The basis of the NCA's claim of authority over blocks or portions of blocks facing this road between Mildura St and Hume Circle is therefore unclear.

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<sup>5</sup> The ABS statistics from 2021 indicate there were about 16,000 dwellings, 31,600 residents, and just under 20,000 cars in the entirety of inner south Canberra.

<sup>6</sup> The 2021 populations of Yarralumla, Deakin, and Red Hill were 3,120, 3,124, and 3,146 respectively.

<sup>7</sup> On Manuka Circle, for example, the NCA has rules covering the setback; building height; and building façade, including such features as design, building material, and finishes, articulation, and the location of entrances. The NCA also asserts control over landscaping in the setback zone between Manuka Circle and the building.

38. We also note that this paragraph specifies “The Main Avenues covered by this Precinct Code are identified in Figure 126 and the Approach Routes identified in Figure 127. The Main Avenues include the land within the boundaries of the reservations of the following roads” ... and “The Approach Routes include the land within the boundaries of the reservations of the following roads”. How this is interpreted as extending the NCA’s authority beyond the boundaries of the respective road reserves is again not clear.
39. If this unilateral expansion of the NCA’s authority is accepted, then large portions of Canberra near any currently recognised Designated Area could be suddenly removed from the Territory’s control. No doubt evading the burdens of the Territory Plan would be attractive to at least some developers, and the NCA should look forward to a steady stream of requests for the creation of new precincts.
40. The amendment could thus set an unfortunate precedent, and lead to a situation where decisions by the NCA could lead to an obligation on the Territory to provide necessary support services and facilities. The Territory’s problems with the development of Brindabella Park at Canberra Airport gives an indication of the potential problems that can arise when planning responsibilities are split between two jurisdictions.
41. It seems very likely that the NCA Board would have sought legal advice to confirm that it did indeed have, under the ACT, the powers it proposes to use in Amendment 102, and we look forward to the release of any such legal opinions.

#### **Pre April 2025 contact with Jega Group**

42. It is clear from the NCA Board meeting minutes posted on the internet that the NCA had been discussing this proposal with a developer, the Jega Consortium, since at least December 2024, and probably considerably earlier. This was confirmed when the Canberra Times of 9 February 2026 where John Gasson, a director of the Jega Consortium, was reported as saying that “The consortium spoke with the NCA about three years prior to February 2026 because the authority had jurisdiction of the Hume Circle as an approach point for Canberra”, implying that the consortium first contacted the NCA in early 2023.
43. For reasons which have not been placed on record the NCA chose not to refer to these lengthy discussions with the Jega Consortium when releasing the Amendment 102 proposal on 5 January 2025. This raises two issues.
44. Firstly, there is a probity issue in that other potential purchasers of blocks in the proposed precinct area would have been unaware of the possible change in zoning. The change from mixed industrial to residential and the concurrent significant uplift in permitted building heights, would be applicable not only to the CZ2 and IZ2 zones north of Wentworth and Canberra Avenues, but also to the already developed CZ2 areas south of these avenues where apartment building heights are currently limited to levels significantly lower than those

proposed. Such an increase in permitted building heights can lead to an increased value for a block.

45. Secondly, prima facie (especially given Mr Gasson's statement) this would appear to be an unsolicited proposal. The ACT has Guidelines on how government bodies are to treat such proposals to ensure that governance and probity issues are appropriately managed. We look forward to the NCA producing documentation to demonstrate that these guidelines have been complied with. It is possible that the NCA might assert that it is not bound by the ACT's Guidelines as it is (in law at least) a Commonwealth body. However, it seems likely that the Commonwealth would also have guidelines on how to deal with unsolicited proposals, and we would expect that if the NCA chooses this approach, it makes public what these Guidelines are and demonstrates how it has dealt with this issue. We expect that the NCA Board, being conscientious and cautious, will have sought legal advice to ensure that its actions were appropriate.

### **Applicability of ACT Planning Law**

46. It would seem that the NCA (and the Jega Consortium) are of the view that making the proposed precinct a "Designated Area" will remove it from the application of Territory Planning legislation and rules. If this is correct the ACT stands to lose a substantial amount as the Lease Variation Charge (LVC) applicable on upgrading a block from IZ2 to CZ2 (which permits multi-unit residential) is likely to be quite significant. There may also be other fees and charges which the ACT will fail to receive were this proposal to proceed, but we lack expertise in this arcane field. However, if there is a risk of loss of funds, we would expect the ACT Government to make public an itemised list of any such losses before permitting the proposal to proceed.
47. If it is confirmed that the ACT will miss out on some revenue then there is a case that the Commonwealth, of which the NCA is an agency, should compensate the ACT for any loss of funds. We could certainly do with the money!

### **To what extent was ACT Government aware of and supportive of the NCA proposal?**

48. Although the NCA has apparently stated that the ACT Government is aware of and supports the proposed precinct we are not aware of any statement from the ACT Government indicating that this is the case.
49. It would clearly be most desirable if the Hume Circle Precinct were developed in conjunction with, and coordinated with, the development of Causeway, the railway yards and Eastlake by the ACT. The GNCA is of the view that this would all proceed more smoothly if all these areas were under the control of the one jurisdiction. As has been pointed out elsewhere in this submission, the Hume Circle Precinct proposal, even if it eventually only involves a

couple of thousand residents, will need significant physical and social infrastructure. Unfortunately, there are no free lunches, there is always a quid pro quo with any perceived gain, and the ACT is going to have to pay something for all this densification. Consequently it would be desirable for the ACT to have control over what is built, when and where.

**Does the NCA have to capability to plan the precinct?**

50. Does the NCA have the resources, staff and experience to appropriately plan a 20ha precinct? Given its small current staffing numbers this seems implausible. Would the Commonwealth be prepared to significantly expand funding of the NCA to enable it to recruit and retain suitable numbers of qualified staff? Given the Commonwealth's apparent reluctance to spend additional funds in the ACT this seems unlikely.
51. The lack of any supportive detail in the NCA's Amendment 102 document is concerning. Reservations about the NCA's possible lack of competence in planning for a proposal of this magnitude might be allayed if the NCA could produce a disinterested and independent assessment that the Hume Circle precinct was a more suitable location for a significant number of 12 to 15 storey tower developments than other alternative sites around Canberra. Absent of this, some might feel the NCA has adopted this idea merely because it is adjacent to a Designated Area approach route under the NCA's control.
52. The absence of any estimates of the likely eventual population of the developed precinct, or of associated traffic flows during its construction and following completion of the development, suggests that the NCA has given the proposal little thought. This is reinforced by an apparent absence of consideration of how to encourage the supportive retail, commercial, and entertainment facilities which will be required within easy walking distance of the precinct<sup>8</sup>, or about the adequacy (or not) of existing utility and social infrastructure.
53. In summary the GNCA is of the view that the NCA does not fully understand the magnitude of the task it proposes to embark upon, does not have the necessary skilled staff it would need to undertake its expanded role, and is unlikely to be granted the funds to make good these shortfalls.

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<sup>8</sup> Narrabundah shops at 1.35km as the crow flies would be closest retail, but this is considerably further on foot and involves crossing busy Canberra Ave.



# GNCA

Griffith/Narrabundah  
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Dear Mr Smith,

## **NATIONAL CAPITAL DRAFT PLAN AMENDMENT 102 – HUME CIRCLE PRECINCT**

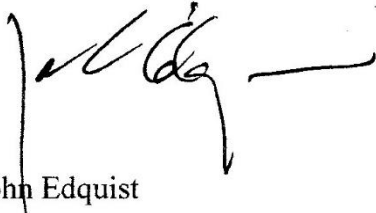
The Griffith Narrabundah Community Association (GNCA) welcomes the opportunity to comment on this issue. The GNCA was established in 2000, and represents the interests of those residents of Griffith and Narrabundah who live south of Canberra Avenue and west of Sturt and Jerrabomberra Avenues.

We had hoped to provide a final submission on this issue by 3 February, the original closing date for submission. However, the recent revelation that the NCA had been in discussions with at least one developer about planning issues related to Hume place have necessitated some redrafting, and so the GNCA submission will now be deferred until 17 February 2026, the revised consultation date. We trust that all submission received up to cob on 17 February will be treated as if they had been received by cob 3 February, the original closure date.

To foreshadow at least some of the final GNCA submission, the GNCA believes that the draft amendment should be withdrawn, and open and public discussions commenced with the ACT Government and planning bodies about the redevelopment of Fyshwick, and those areas of Griffith north of Wentworth Avenue and Canberra Avenue. All of Narrabundah, and those areas of Griffith and Kingston south of Canberra and Wentworth Avenues should not be included in any redevelopment plans.

In addition, the GNCA believes that any possible breach of probity arising from not revealing the prior discussions with developers when this amendment was first announced to the public should be investigated fully by the proper authorities, whether federal and/or territorial, and any resulting recommendations fully implemented.

Yours sincerely

A handwritten signature in black ink, appearing to read 'John Edquist', with a horizontal line extending to the right.

John Edquist

President

GNCA

[info@gnca.org.au](mailto:info@gnca.org.au)

3 February 2026

As residents of Griffith, we strongly reject the proposed High-rises around Hume Circle.

Hume Circle is always a very busy roundabout where uninterrupted vision of oncoming traffic is essential for safety - traffic must be clearly viewed approaching from reasonably long distances, as possible at present, without any interruption to attention or visibility.

High rise nearby would certainly be distracting as well as unsightly.

Happy to support smart and needed development but this proposal is neither smart or needed around Hume Circle, and certainly not so close to both nearby high schools.

John and Suzanne Jedryk

## **Draft Amendment 102 – Submission**

### **Introduction**

Based on my experience and engagement as a property owner in what the amendment describes as a 'Precinct', I am totally opposed to Draft Amendment 102.

Under no circumstances do I want the National Capital Authority to have any form of control over planning outside the bounds of the Parliamentary Triangle.

### **First Move**

This seems to have been a “first move” planning decision designed to gauge community sentiment to land uses and building heights.

### **The Draft Amendment as a Text**

The Draft Amendment is an especially unfriendly document.

Its structure, style, use of language and editing leave me very unimpressed with the abilities of the NCA to express their knowledge, aims and interests. It also leaves me with doubts as to their ability to express concepts key to their function as a statutory authority.

The Draft Amendment itself is all based around two images – figures 146 and 147.

These two images form part of a “stack” – that is they are meant to be understood as layers. Ideally, the first layer should be the present location and as recent an image as possible – as a high-resolution aerial photograph. This layer was not present in the Draft Amendment. This should be the context of the Amendment.

Figures 145, 146 and 147 all lack legible scales or compass directions.

As each layer is built it would ideally be as a series like this (their labels in brackets) –

- i. Satellite Image (Present Day)
- ii. Present location with detailed markings for roads, existing structures and exclusion by way of colourings, or similar means of identification, of areas not subject to the Amendment. (Area in Question)
- iii. The proposed land uses for the areas would then overlay images one and two. They should have a key consistent with the text in the Draft Amendment explaining the permitted uses. (Proposed Land Uses)
- iv. The proposed building heights as the final image, that is the topmost element of the stack. (Proposed Heights of Structures)

The presentation of these images seems to have been the source of all the community's frustration and distress.

It is Figure 147 that is the “First Move” being gauged by submissions to the NCA.

If I had been asked to write this Draft Amendment I would have put the entire Background element at the start of the document as that is the question that is being asked of the reader.

*- What is the community sentiment toward the zoning of 15-storey residential homes in this area?*

Note my use of plain English – the use throughout the Draft Amendment of phrases like Precinct and RL617 is jargon. It is a specialised way of communicating between planners and similar professionals engaged in construction. The *Style Manual* is very clear on the use of jargon and writing for the public.

If the document had been created or thought about in this way during the initial planning of the Draft Amendment, then this would have made a clear piece of writing.

Attached is an Appendix detailing the many mistakes that are immediately apparent in this document. As well as a detailed commentary on the use of arguments and rhetorical devices that are used to justify Figure 147.

I am *very* unimpressed that I and my neighbours have had our time wasted by the National Capital Authority as we have struggled to understand the Draft Amendment. The result is Draft Amendment 102 as a document and process could be considered as some kind of mischief or public nuisance.

### **The Process**

The consultation process was especially unhelpful because of the way it was communicated and when it was communicated.

The NCA does not have an adequate community engagement Policy and relies upon a “Commitment to Community Engagement” as a charter of service.

The Draft Amendment was not well advertised and I will address that in detail in the Appendix.

I did not appreciate being spoken over in our meeting yesterday when I was clearly and simply explaining the principles of planning and design that the Griffins’ used.

### **Total Rejection of Figure 147**

As Figure 147 (as part of a stack of images) is the object in question – what we have been asked to give an opinion on – I submit that under *no* circumstances do I want:

- i. To be made a Significant Area or Precinct, or under any other form of authority of the NCA.
- ii. Have any proposed land uses as described, without clear community consultation and that this should be performed by the ACT Government only.

- iii. Should the NCA be involved in any way in the planning of my area, there must already be detailed conditions present and available and that the phrase “subsequent applications for works must demonstrate that proposals are not inconsistent with the detailed conditions” (p.26) is not present in the detailed conditions of planning design and development.  
The only acceptable phrasing is as follows: *All proposals for works must be consistent with the detailed conditions.*

## **Consequences**

The decision maker, the editor/author, contributors and illustrator/designer of the images should immediately identify themselves and their contributions to the amendment by way of a public statement on the NCA’s website attached to the webpage of the Draft Amendment.

The Draft Amendment should be immediately withdrawn.

The NCA should immediately write a Policy on community engagement for all their activities and implement it with performance benchmarks reported in their Annual Report.

All involved should be counselled on their leadership responsibilities, especially to the public whom they serve. Each should be offered training in communication and writing as part of individual performance management measures.

The NCA should publicly apologise to the Canberra community who have been adversely impacted by the consultation process of the Draft Amendment, by way of a statement to Parliament, printed apology in a national and local daily newspaper and some form of community event to rebuild trust.

Draft Amendment 102 should act as a textbook case of how *not* to engage the public and communicate a planning decision.

I have lost my trust in how planning decisions are made at all levels of government through this process.

Overall, this has been a particularly frustrating lesson in writing, communication, planning, civics and citizenship. One I sincerely hope no one has to go through again.

4<sup>th</sup> of February, 2026.

## Appendix

### Contents Page

There is no contents page, the addition of a contents page would make the Draft Amendment much easier to understand.

### Reading the Draft Amendment

Reading the Draft Amendment was challenging because none of it seemed to fit together clearly. It had clearly come from a single source, but it was not clear what that was. Examining the *National Capital Plan 1990 (December 1990)* (Hereafter The Plan) I noticed that the first two pages of the Draft Amendment seemed to be a paraphrase of The Plan.

Instead, it is a cut and paste of parts of The Plan itself without attribution or quotation marks and references/citations. It occasionally has linking text that was written to join sentences.

### Introduction the First

The first 'Introduction' on p.2 features two direct quotes as a series of dot-points from The Plan. The first 5 points are from page 2 of The Plan and the second 8 points were from (p.4) The Objectives of the National Capital Plan.

In The Plan, the objectives are numbered, here they are expressed as dot points and do not have their page number as a citation. It is not clear that these are a direct quote, and they could have been italicised and a hyperlink to the page, or the The Plan itself for ease of reference.

The sentence that introduces the objectives on page 2 (in the Draft Amendment) is unnecessarily long and uses terms associated with legal documents like "legislative object" -

*"Within the framework of this legislative object or goal, key objectives of the Plan are to:"*

Whereas the introduction in The Plan is simply:

*"Key objectives of the Plan are to:"* (p.4)

The latter sentence is half the length and makes much more sense to readers. The phrase "legislative object or goal" is nowhere in The Plan that I can see.

### The Context (p.3)

The first paragraph of the Context is a direct quote from The Plan (p.6) which is headed Matters of National Significance.

The second paragraph is a direct quote from the third paragraph of the Introduction from The Plan (p.1).

The third paragraph is a direct quote from the eighth paragraph of the Introduction of The Plan (p.1)

The fourth paragraph is a partial quote from the first paragraph of the Introduction of The Plan (p.1)

The fifth paragraph of the Draft Amendment includes an italicised piece of text which is not properly cited. A casual reader would likely think this is a direct quote. However, it's a quote combining two dot points from page 2 of The Plan previously quoted on page 1 of the Draft Amendment.

It's clearly an important quote why else would you italicise it? And it seems to outline why the Draft Amendment is important. Unfortunately, the lack of attribution makes it unclear if this is part of an Act of Parliament or a statement from elsewhere.

Looking through the Draft Amendment 'Griffin Vision' on (p.3-4) and the 'Background' (p.20) does attempt to give some context to the proposal, but does not engage well with the Griffins' and their thinking on planning and urban design. It does not appear to be a direct quote from another document.

The Draft Amendment does not quote either of the Griffins' directly. It does not include a report or study into their work. I would expect to see a report or study referred to in such an Amendment to give greater context. Some kind of Heritage Planner or Architect would be ideal to write a report explaining the significance of just such a project.

P. 4 is devoted to the site and then, without a heading it suddenly outlines a National Cabinet agreement in 2023. This section of P.5 is clearly different to the earlier text on the site, and it is not given its own heading and would probably have been section 1.3. I couldn't work out why this jumped from 1.2 on p.4 to 1.4 on p.6...

There is an 'Explanatory statement' on designated areas. There are then three numbered points quoted from The Plan, p.8 which should be headed (as in the original):

*"In identifying lands that have the 'special characteristics of the National Capital' and deciding the extent of the Designated Areas, three primary factors are relevant:"*

Not -

"A number of factors are relevant in determining whether a place or area has the special characteristics of the National Capital:"

**The Background as a Text (Pages 20-26)**

It looks from the style of writing and the varied punctuation and bullet points that much of this portion of the text was written by two people, maybe more. I can't tell without access to the Electronic Records Management System used by the NCA. There may be a single document which was edited from OpenText or from a shared Microsoft OneDrive folder.

This text is not in keeping with the style of the rest of the Amendment. It uses words like orchestrated, higher-density urban form, urban realm, integrated green space network and an assortment of words and word groupings presently popular in the APS like "optimise," "embed design excellence" and "exemplar of urban regeneration" – non-terms if ever I heard. And highfalutin to boot.

The strange thing about this portion of the Amendment was the use of punctuation.

In pages 20-21 has dot points beneath the numbered sections. These dot points don't start with capital letters and aren't consistent with pages 1 and 2, which is why I thought this had been written by many people and in parts or as separate tasks. I just couldn't make sense of it all as a single unified document with a single author/editor.

### **The Land Uses**

This portion of the Draft Amendment had me especially confused because I could not square the 33 dot points for Land Use A with Figure 146 on page 22. It seemed to me reading just this portion of the document that the person who drew the diagram had not read the list. If you tried to apply that 33 point list to the diagram the whole thing would be mauve including the road, the open space and the community use.

The list itself is simply cut and pasted with some mistakes.

The permitted land use categories on the list are odd to someone not familiar with planning. Categories/words that you think might be synonyms are separated and treated as unique/different.

A search of the NCA's website revealed lists of bullet points all on a single page:

<https://www.nca.gov.au/planning/plans-policies-and-guidelines/national-capital-plan/consolidated-national-capital-plan/precinct-codes>

The person cutting and pasting the list first separated Cooperative Society from the bullet point for Bank. Perhaps they did not know that a Cooperative Society is a form of mutual/customer owned bank (maybe they were under 50 years old).

On the website is the category "Café, Bar, Restaurant". In the Draft Amendment they are three separate categories each as their own dot points in alphabetical order.

There is a category at bullet point 10 - Community facility.

Looking through the list, I was puzzled that there was also a “Social/Community facility”. Why is this in the document twice? Every other reference I could find on the webpage is “Social/Community facility”. Another mistake.

For the remainder of this last section of the document (pages 19-26), the Style Manual is clear on the use of specialist and technical terms -

*You can include technical or specialist terms if your research shows your audience uses them. But start with plain language words as the default to keep the reading level accessible. [Plain language helps everyone.](#)*

*To help people understand specialist or technical content:*

- *explain terms – for example, use a glossary*
- *include a short summary without using specialist terms.*

<https://www.stylemanual.gov.au/writing-and-designing-content/clear-language-and-writing-style/plain-language-and-word-choice>

## **Imagery**

The use and presentation of images in this document is a concern.

- Use of the term figure is confusing, on page 4 ‘Figure 1’ is noted, then in the text on page 10 there is reference to deletion that would occur to designated areas and ‘Figure 1: Designated Areas’ is mentioned.  
To a reader unfamiliar with how Amendments are made to Acts of Parliament this would be especially confusing as they try to navigate the document using the images present.
- The numbering of the images that are presumably not in covered by the proposed Amendment to the Act on pages 4, 5, 19, 22, 25 goes from Figure 1 to Figure 147. Again, it would be confusing to someone looking at the images – they might ask: *How did we go from 1 to 147 images in a document that only contains 26 pages?*
- Figure 145 appears incomplete with a significant proportion of the buildings in Narrabundah missing. It’s not clear why the tree cover or the buildings are on this diagram and the key does not describe what they are. The label makes little sense in the context of the Amendment. The precise location of ‘the Hume Circle Precinct’ has been established on pages 4, 5, 7, 11, across two pages 13-14, 16 and 17.
- The keys on 145, 146 and 147 could easily be improved to make the images more legible and aid in understanding what the most important elements are to these drawings and what they are meant to tell the viewer.
- Figure 1 (p.4) shows an “extract” of a larger plan for Canberra. The complete drawing is not shown. This makes it all but impossible to understand the context of Hume Circle to the Griffins’ overall design. Ideally the word *detail* would be

used to describe the image, as this is the common way of referring to an enlargement of a section of an image. It also does not provide a citation to say the source of the image and its original title.

- As a result of the detailed view of Figure 1 (p.4) it was hard to understand the area as it is now and see the changed uses – Eastlake Esplanade is now Canberra Avenue and part of the proposed site being discussed in the document was proposed as a body of water – a lake.

The accompanying text (p.3-4) does explain some road name differences, but a shortcut to understanding this would be to provide two images, the second being a street directory map that would be easily recognisable to readers.

It is presently what is commonly called a light-industrial area.

It took me a while to understand what I was looking at in Figure 1 (p.4) and realise why something was very odd about the Griffins' plan compared to all the other images in the document.

- Further to the concerns mentioned in my Submission, very few people are aware of stacked images, why and how they are used. They are a highly specialised visual communication tool used in the construction, planning and publishing industries.

I only worked it out when I accidentally clicked between the images and ignored the text. I know about layered/stacked images because I have worked in the broadcast industries and image stacking is performed to add what are called “supers” that is a superimposition onto moving images in the form of mattes and texts to name people on screen or display special graphics.

A reader who does not print the document would not realise that this is a stacked image and its order (as ideally put in the Submission) is crucial to understanding what information is being presented.

The *Style Manual* explains how images should be used –

*Images must be:*

- *accessible*
- *easy to understand*
- *relevant*
- *uncluttered*
- *from a credible source*
- *consistent in design and style across the content.*

Further to this, when charts, graphs and maps are used -

*All graphs, charts and maps should have a legend that tells people the meaning of lines, colours and symbols.*

*Make legends consistent in a webpage or group of webpages dealing with the same topic. Place the legend in the same position (for example, bottom centre, top left or to the right).*

*Use the same font and typeface, and colours and symbols for the same types of information.*

*Maps must also have a scale bar and an arrow to show which way is north.*

*Include all units of measurement.*

[https://www.stylemanual.gov.au/content-types/images#use\\_graphs\\_charts\\_and\\_maps\\_if\\_they\\_explain\\_complex\\_information](https://www.stylemanual.gov.au/content-types/images#use_graphs_charts_and_maps_if_they_explain_complex_information)

### **Comments on Rhetoric/Arguments and the Griffins' Work**

When you consider what the Griffins' were doing in their plan for Canberra, they were incredibly clever and clearly classically trained architects/artists. Everything is in thirds. Even their concerns seem to be in threes –

- i. Geography
- ii. Topography
- iii. Geometry

It's these elements that give their plan its unique character. Their geography is about physically changing the landscape to make boulevards and lakes. When they create a symbolic entrance to an area of significance they have considered how you move through that space and how the geography tells you (subliminally) where you are and where you're headed.

They use water, sky and land as his three means of giving us orientation. Have I got water to my left and right? Then I'm crossing the bridge. I'm on a road and the water is to my right and land to my left means I'm heading northwest. If the sky is below me I've crashed the car.

They then introduces topography (with three hills) – which hill do I see as I travel? Then, if I'm at the top of that hill what do I see and how do the designs become apparent?

Given their brief, they also puts buildings of national significance at the ends of his triangular forms and he sites these buildings on round forms. Buildings like the Parliament, the War Memorial and important government offices like Russell.

I don't see in this proposal *any* kind of grappling with the Griffins' thinking and the plan he created. It's not there. At no point does someone write or show how the proposed high density apartment complexes (sorry, Land Use A) constitute significance. They

don't show how they alone create a symbolic or physical entrance. They do not explain with reference to the three elements how they do this in the present context.

I have to say on a separate note that the use of the Griffins' to justify planning decisions and ideas in Canberra has driven me (and the broader community) to distraction. They are intoned to justify any and every decision that is hard to get past community consultation. Sprinkle some Griffin and pouf opposition is gone! This is Canberra's ultimate non-sequitur argument. Make some statement (without attribution, direct quotes or clear context) and like some ancient religious text everyone goes spinning off in every direction getting dizzy. Take a look at any Facebook post or issue of *the Canberra Times*, when a planning decision involves the Griffins' it looks more like a sectarian fight between religious groups.

4<sup>th</sup> of February, 2026.

Dear Chief Planner and Strategic Planning team,

Regarding the proposed Amendment 102 (the amendment) to the National Capital Plan (the Plan), I write to raise a number of concerns with both the process and the amendment. I object to the existence of the amendment, and the consultation and the associated consultation process. Further details of my views are provided below.

I disclose that I am an owner-occupier resident of the Staffordshire Terrace apartment complex, which is within the boundaries of the amendment proposed.

### **Recommendation**

I recommend that:

- i) the amendment should not proceed; and
- ii) any future amendments to the Plan be developed with more care and improved consultation processes.

### **Reasons:**

#### *Quality of Amendment*

I am concerned that the amendment has not been well developed and has been produced with a limited understanding of the physical situation or consequences placed upon current and future residents of the area if implemented. The objectives of the amendment (s 4.19.3 on p20) are also completely at variance with the proposal on page 22 at Figure 146. My concerns include:

- The proposed amendment, especially its explanatory basis at Figure 146, suggest that the matter has not been thoroughly considered and this draft prepared on the basis of a 'desktop exercise'. The officials preparing the materials have failed to undertake a cursory look at Google Maps in satellite view, nor consulted ACT surveyors maps, to realise that the proposed circles suggested of open space directly cut through existing properties, creating not only an immediate loss of amenity, but also a safety hazard - literally cutting through an internal thoroughfare for cars moving between the driveways and carparks for example.

- The reference to Walter Burley Griffin's plan (the Plan) is ahistorical. Such a plan, which has not been rigorously followed in the past (for example the current level development at Barton would never have been envisaged) and does not reflect on the ground reality for example the Jerrabomberra Wetlands and Fyshwick occupy the imaginary east lake geography displayed on page 4. The Plan has been cited opportunistically to suggest the amendment has congruence with its intent.
- Further, in reference to the Plan, the proposed amendment would site fifteen storey buildings which are in line of sight of Parliament House. Having approximately the same height as Parliament House is a feature which is not supposed to exist under the Plan, whereby the Capitol is the centrepiece. Several previous development decisions have been knocked back accordingly in the past for violating this principle, as the NCA should well know. If there is some reason why this planning principle of the Plan can now be ignored the paper fails to clarify this.
- The height of the buildings proposed is exceedingly inappropriate for the affected area . It would only take a very short walk to see that the proposed heights would be vastly more than what multi-story apartments already exist in the affected area. If developed as proposed, future structures in the eight to fifteen storey range will peer over St Clare's College oval, which is currently concealed with trees and foliage, and will literally tower over the one and two-storey houses on the southern side of McMillan Crescent. It would also tower over the Russian Orthodox Church, located on the corner of McMillan Crescent.
- The proposed amendment has given no consideration of the surrounding traffic situation. A proper site examination over a normal period of time when students are at school and the normal population is at work would have indicated that the intersection is already heavily commuted by people moving between 'Canberra Central' as described on page 7 and the Fyshwick/Queanbeyan area. If the amendment is executed then there will be a large number of additional motorists who will need to move towards and through this residential space. This will not make Hume Circle 'a symbolic gateway' , it will merely make it a traffic obstacle like Vernon Circle is now when one needs to go between Civic and Parkes via Commonwealth Avenue.
- One of the reasons given for the amendment, seeking to provide ' a symbolic gateway', is superfluous. There are already such 'gateways' at the road borders with New South Wales at Canberra Avenue, the Monaro Highway, the Federal Highway and the airport for example. Canberra is a large conurbation as it is, creating an additional 'gateway' in the form of excessively tall apartment towers in the middle, through one axis of approach, is pointless and insensible.

- The proposed amendment is at variance with the stated goal of increasing green space by authorising so much to be paved over, or have large buildings authorised to be sited on top of current greenspace (including parts which are for current private residents). Under new developments enabled by the amendment there would be more residents vying for a smaller green space (including on their own developments).
- There is no evidence from the zoning amendment to create offices or industrial areas for people to work (excepting some trivial cafe's on the ground floor as is often proffered by developers, and perhaps some people who like to work at home), the only intention is to build more apartments.
- The opening Section 4.19.5 seems to have been written without actually reading the amendment - none of the proposed changes actually creates a visual connection with the Causeway alignment because the Causeway does not exist, none of the existing roads are being removed (excepting the Canberra Avenue Service Road on the north side - although the amendment is unclear on that point), and most importantly because the planners expect to have erected multiple eight to fifteen storey tall towers to block the view.
- Additionally, concerning section 4.19.3, no one is going to actually benefit from extending McMillan Crescent or 'reinstating the intent of the radial geometry contemplated by the Griffith Plan' except people who like circular roads or otherwise implementing axial streets - nobody is asking for this kind of design, not in Canberra and not in the world. It will not increase the amenity for anyone that some more roads are curved, so that town planners can see circles on the street maps.
- There is a lack of evidence provided concerning the potential geological or hydrological issues created by the erection of significant towers as intended by the amendment. Erecting tall buildings will require deep foundations and deep carparks upon construction, it is not made clear whether the ground is suitable for this. Additionally, the discussion in the background paper is cursory concerning infrastructure - it is not obvious how feasible it would be to appropriately increase the sewerage works (freshwater and wastewater) to support the degree of construction envisaged. The NCA could have at least discussed and disclosed the appropriate details in the background paper.

### *Process*

I wish to express my concern at the consultation process thus far entered into. In particular:

- The timing of the consultation was highly questionable, during a well known holiday period when many people are away and not likely to think to view or consider the relevant amendment. If I was being uncharitable, it might be suggested that there is an attempt to conceal the proposal from the scrutiny it deserves.
- The NCA has made the most limited attempts to make affected residents aware of the proposed Amendment other than through their website. There has been no other media representations made, it is only fortuitous reporting in the Canberra Times that has otherwise brought this to the attention of a wider community audience. I acknowledge that a two weeks extension was provided, though notably there was a letter from the Chief Minister which may have finally encouraged some action in this direction.
- The drafting of the document put out for consultation is very poor. Further care should be taken when preparing relevant documents. For example:
  - Two introductions at the commencement, followed by a Background on page 20;
  - Figure 145 on page 19 is inaccurate by not including all relevant structures (somehow only a small portion of Narrabundah has houses, which would be a great surprise to the many existing residents);
  - The permitted land uses on page 23 is a poorly developed list and is a mixture of lists taken from other documents, with a number of duplications.
  - The papers never actually justified the heights proposed. Page 15 obscures that RL617 is code for 15 storeys, while disclosing heights only on the map on page 25.
  - The quality of the maps is particularly poor in general, including a lack of scale and direction indication. There is also no topographical information supplied, despite there clearly being an incline through the affected area, if anyone had actually physically visited it.

Dear NCA Chief Planner,

I am writing to provide feedback on Draft Amendment 102 - Hume Circle Precinct.

As an owner and resident of ... I would welcome the development of more apartment buildings in my area. My wife and I became first time home owners when we bought this apartment, which has allowed us to live close to the CBD with a reasonably affordable mortgage. I approve of that opportunity being extended to more people.

However, I do object to the proposal for McMillian Crescent being extended to connect with Leichhardt St, which would require the demolishing of my building. Obviously I am very personally attached, as I love my home and do not wish to move. If the proposal was approved it would also presumably drive down potential sales prices within Axiom, so that if we did choose to move we would not be able to afford to stay in this neighbourhood.

Outside of my personal feelings however, I also believe this plan to be environmentally neglectful. Axiom is less than 10 years old, and is well-constructed - the end of its useful lifespan is decades away. Given the environmental cost of building construction, it would be wasteful to demolish it early.

Demolishing Axiom to honour the plan of a designer many years dead, who created his plans for a much smaller city, prioritises an idealised vision of the past over our current realities. Burley Griffin's vision for Hume Circle was certainly pretty, but our reality now is that there's a building full of Canberrans in the way. I hope we are not the kind of city that considers one man's vision more important than those people and their home.

Thank you for your consideration of this submission.

# Submission to DA102 public consultation of the National Capital Authority

This document is presented to the National Capital Authority pursuant to invitation for submissions closing 2026-02-17 in respect of DA 102. Submitted by Thirunavukkarasu Sivasubramanian & Nindhu Thirunavukkarasu, of Narrabundah ACT 2604.

## Executive summary:

I oppose the proposed development in its published form, as it would result in an unacceptable loss of residential amenity to properties in the southern segment of McMillan Crescent and Kootara Crescent due to excessive winter overshadowing.

- When land is designated under the National Capital Plan, the absence of prescriptive solar access controls in the Plan does not remove the obligation to avoid unreasonable amenity impacts on surrounding residential land.
- The proposal is inconsistent with established ACT planning precedent, specifically Territory Plan Variation 382 under section 76(2)(a) of the Planning and Development Act 2007, which requires that development near residential areas demonstrate minimum overshadowing.
- The development conflicts with the intent of Territory Plan Rule RI 10, which ensures reasonable solar access for adjoining residential development where buildings exceed three storeys.
- The location of the proposed 15-storey buildings in the southern segment of Hume Circle is fundamentally inconsistent with clause 14.3 of the Territory Plan, as it would result in a substantial (and non-compliant) proportion of adjoining apartments receiving no direct sunlight between 9:00 am and 3:00 pm on the winter solstice.
- The proposal also conflicts with the solar fence principles in clause 14.1, as evidenced by complete winter noon overshadowing of dwellings along the southern side of McMillan Crescent and northern Kootara Crescent.
- The development would significantly undermine household solar generation, contrary to Commonwealth and ACT policy objectives, including the Small-scale Renewable Energy Scheme and ACT climate legislation.
- The application does not adequately assess or mitigate these impacts, and the cumulative extent and duration of overshadowing represent an unacceptable planning outcome.

# Full submission

## Contravention of existing solar access planning regulations

The proposed development of DA102 in the southern segment of Hume Circle would result in an unreasonable loss of residential amenity to properties in the southern segment of McMillan Crescent and Norther Kootara Crescent due to excessive overshadowing. During the winter months, affected properties, including my own, would be placed in shade from mid-morning onwards as a direct consequence of the height, scale, and siting of the proposed buildings.

The National Capital Plan does not contain prescriptive solar access or overshadowing controls. In the absence of such controls, the National Capital Authority must have regard to broader planning principles, including the avoidance of unreasonable amenity impacts on surrounding land and the maintenance of environmental quality and liveability outcomes.

This approach is consistent with recent ACT planning precedent, including the precedent established by Variation 382 to the Territory Plan made under section 76(2)(a) of the Planning and Development Act 2007, limiting development within 50 metres of residential areas to six storeys and requires, under Criterion 83, that development demonstrate that minimum overshadowing occurs. This demonstrates a clear and current policy position within ACT planning law that height and proximity must be constrained to protect solar access and amenity of neighbouring residential areas.

Territory Plan Rule RI 10 further requires that development exceeding three storeys provide reasonable solar access for adjoining residential development. Although designation of land allows technical exemption from direct application of the Territory Plan, wholesale disregard for these requirements undermines the planning principles that the National Capital Plan is intended to reflect and support. Direct contravention of Territory Plan Rules R108—R110, and of Commonwealth policy settings such as the Small-scale Renewable Energy Scheme, creates a strong and compelling argument against the proposal.

The proposed apartment buildings along the northern kerb of McMillan Crescent are also demonstrably non-compliant with clause 14.3 of the Territory Plan, which requires that no more than 15 per cent of multi-unit dwellings receive no direct sunlight between 9:00 am and 3:00 pm on the winter solstice. With a 15-storey building overshadowing the three-storey transitional apartments immediately to the south, it is not possible for this requirement to be met. Based on the proposal's massing and shadow extent, approximately 75% of those apartments would receive no direct sunlight at all on the winter solstice (being one third of the top storey, plus the two lower storeys excluding the edges).

In addition, the proposed 15-storey apartments breach the solar fence requirements in clause 14.1 of the same regulations; the development overshadows all dwellings along the southern side of McMillan Crescent at noon during winter, which the solar fence controls are expressly intended to prevent.

## Inconsistency with existing clean energy transition policy

The loss of solar access would also materially affect the ability of existing dwellings to generate rooftop solar energy. Commonwealth and ACT governments actively promote household solar generation through policy and financial incentives, including the Small-scale Renewable Energy Scheme and ACT climate legislation such as the Climate Change and Greenhouse Gas Reduction Act 2010. The proposed development would significantly reduce winter solar availability to existing dwellings, directly undermining these policy objectives at the time of year when household electrical energy demand is highest for heating.

## Inconsistency with Griffin Plan

Overshadowing impacts would extend beyond private dwellings to the public realm. Prolonged winter and spring shading would likely result in die-back of established private gardens, and both northern and southern nature strips along south McMillan Crescent and North Kootara Crescent. The height of the proposed buildings would cause shadows to persist into the spring months, increasing the likelihood of longterm damage to vegetation, including gardens in front of the McMillan Gardens apartments. This outcome is inconsistent with the Griffin Plan principles and the Territory Plan objectives relating to landscape character, tree canopy, and the garden city setting.

## Inadequate preliminary impact assessment

The proposal does not adequately identify, assess, or mitigate these impacts. Shadow analysis for the north Kootara Crescent precinct is absent. No credible mitigation measures are proposed. As a result, the development fails to demonstrate that it avoids unreasonable impacts on amenity or aligns with the planning principles consistently applied across ACT legislation and policy.

## Conclusion

Taken together, the extent and duration of overshadowing represent an unacceptable impact on residential amenity. Even allowing for the land's designation status, the proposal conflicts with well-established planning principles, recent ACT legal precedent, and clear policy intent to protect access to daylight, sunlight, and solar energy for existing residential development.

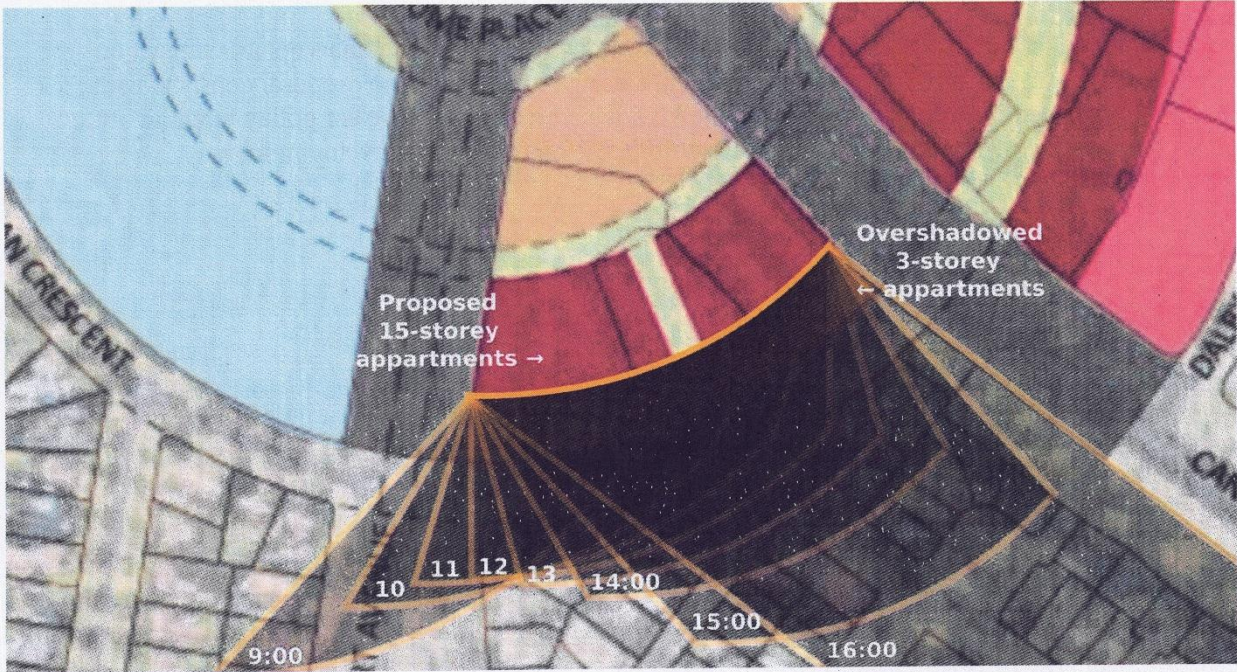
# Appendix: Hourly winter solstice shadow diagrams

I have used some help to calculate the below and have illustrated the shadow diagrams based on the following data and assumptions:

From the proposal building footprint drawing, each illustrated dark red surface represents a building approximately 100m wide on the southern arc, and 60m deep. Griffith's contours at McMillan Cr and the RL617 limit yields a building height of approximately 55m, consistent with 15 storeys.

The June 21 solar azimuth and elevation bearings (rounded to nearest degree) are tabulated as follows, and simple trigonometry is used to determine the shadow length:

Time (hour)	9:00	10:00	11:00	12:00	13:00	14:00	15:00	16:00
Azimuth (degrees)	43	31	17	0	345	330	318	308
Elevation (degrees)	16	24	29	31	29	25	18	9
Building shadow length (m)	192	124	99	92	99	118	169	347



# Submission to DA102 public consultation of the National Capital Authority

This document is presented to the National Capital Authority pursuant to invitation for submissions closing 2026-02-17 in respect of DA102.

## Executive summary:

I oppose the proposed development in its published form, as it would result in an unacceptable loss of residential amenity to properties in the southern segment of McMillan Crescent and Bega Place due to excessive winter overshadowing.

- When land is designated under the National Capital Plan, the absence of prescriptive solar access controls in the Plan does not remove the obligation to avoid unreasonable amenity impacts on surrounding residential land.
- The proposal is inconsistent with established ACT planning precedent, specifically Territory Plan Variation 382 under section 76(2)(a) of the *Planning and Development Act 2007*, which requires that development near residential areas demonstrate minimum overshadowing.
- The development conflicts with the intent of Territory Plan Rule R110, which ensures reasonable solar access for adjoining residential development where buildings exceed three storeys.
- The location of the proposed 15-storey buildings in the southern segment of Hume Circle is fundamentally inconsistent with clause 14.3 of the Territory Plan, as it would result in a substantial (and non-compliant) proportion of adjoining apartments receiving no direct sunlight between 9:00 am and 3:00 pm on the winter solstice.
- The proposal also conflicts with the solar fence principles in clause 14.1, as evidenced by complete winter noon overshadowing of dwellings along the southern side of McMillan Crescent.
- The development would significantly undermine household solar generation, contrary to Commonwealth and ACT policy objectives, including the Small-scale Renewable Energy Scheme and ACT climate legislation.
- The application does not adequately assess or mitigate these impacts, and the cumulative extent and duration of overshadowing represent an unacceptable planning outcome.

## Full submission

### ***Contravention of existing solar access planning regulations***

The proposed development of DA102 in the southern segment of Hume Circle would result in an unreasonable loss of residential amenity to properties in the southern segment of McMillan Crescent and Bega Place due to excessive overshadowing. During the winter months, affected

properties, including my own, would be placed in shade from mid-morning onwards as a direct consequence of the height, scale, and siting of the proposed buildings.

The National Capital Plan does not contain prescriptive solar access or overshadowing controls. In the absence of such controls, the National Capital Authority must have regard to broader planning principles, including the avoidance of unreasonable amenity impacts on surrounding land and the maintenance of environmental quality and liveability outcomes.

This approach is consistent with recent ACT planning precedent, including the precedent established by Variation 382 to the Territory Plan made under section 76(2)(a) of the Planning and Development Act 2007, limiting development within 50 metres of residential areas to six storeys and requires, under Criterion 83, that development demonstrate that minimum overshadowing occurs. This demonstrates a clear and current policy position within ACT planning law that height and proximity must be constrained to protect solar access and amenity of neighbouring residential areas.

Territory Plan Rule R110 further requires that development exceeding three storeys provide reasonable solar access for adjoining residential development. Although designation of land allows technical exemption from direct application of the Territory Plan, wholesale disregard for these requirements undermines the planning principles that the National Capital Plan is intended to reflect and support. Direct contravention of Territory Plan Rules R108–R110, and of Commonwealth policy settings such as the Small-scale Renewable Energy Scheme, creates a strong and compelling argument against the proposal.

The proposed apartment buildings along the northern kerb of McMillan Crescent are also demonstrably non-compliant with clause 14.3 of the Territory Plan, which requires that no more than 15 per cent of multi-unit dwellings receive no direct sunlight between 9:00 am and 3:00 pm on the winter solstice. With a 15-storey building overshadowing the three-storey transitional apartments immediately to the south, it is not possible for this requirement to be met. Based on the proposal's massing and shadow extent, approximately 75% of those apartments would receive no direct sunlight at all on the winter solstice (being one third of the top storey, plus the two lower storeys excluding the edges).

In addition, the proposed 15-storey apartments breach the solar fence requirements in clause 14.1 of the same regulations; the development overshadows all dwellings along the southern side of McMillan Crescent at noon during winter, which the solar fence controls are expressly intended to prevent.

### ***Inconsistency with existing clean energy transition policy***

The loss of solar access would also materially affect the ability of existing dwellings to generate rooftop solar energy. Commonwealth and ACT governments actively promote household solar generation through policy and financial incentives, including the Small-scale Renewable Energy Scheme and ACT climate legislation such as the Climate Change and Greenhouse Gas Reduction Act 2010. The proposed development would significantly reduce winter solar availability to existing dwellings, directly undermining these policy objectives at the time of year when household electrical energy demand is highest for heating.

### ***Inconsistency with Griffin Plan***

Overshadowing impacts would extend beyond private dwellings to the public realm. Prolonged winter and spring shading would likely result in die-back of established private gardens, and both northern and southern nature strips along south McMillan Crescent. The height of the proposed buildings would cause shadows to persist into the spring months, increasing the likelihood of long-term damage to vegetation, including gardens in front of the McMillan Gardens apartments. This outcome is inconsistent with the Griffin Plan principles and the Territory Plan objectives relating to landscape character, tree canopy, and the garden city setting.

### ***Inadequate preliminary impact assessment***

The proposal does not adequately identify, assess, or mitigate these impacts. Shadow analysis for the southern McMillan Crescent precinct is absent. No credible mitigation measures are proposed. As a result, the development fails to demonstrate that it avoids unreasonable impacts on amenity or aligns with the planning principles consistently applied across ACT legislation and policy.

### ***Conclusion***

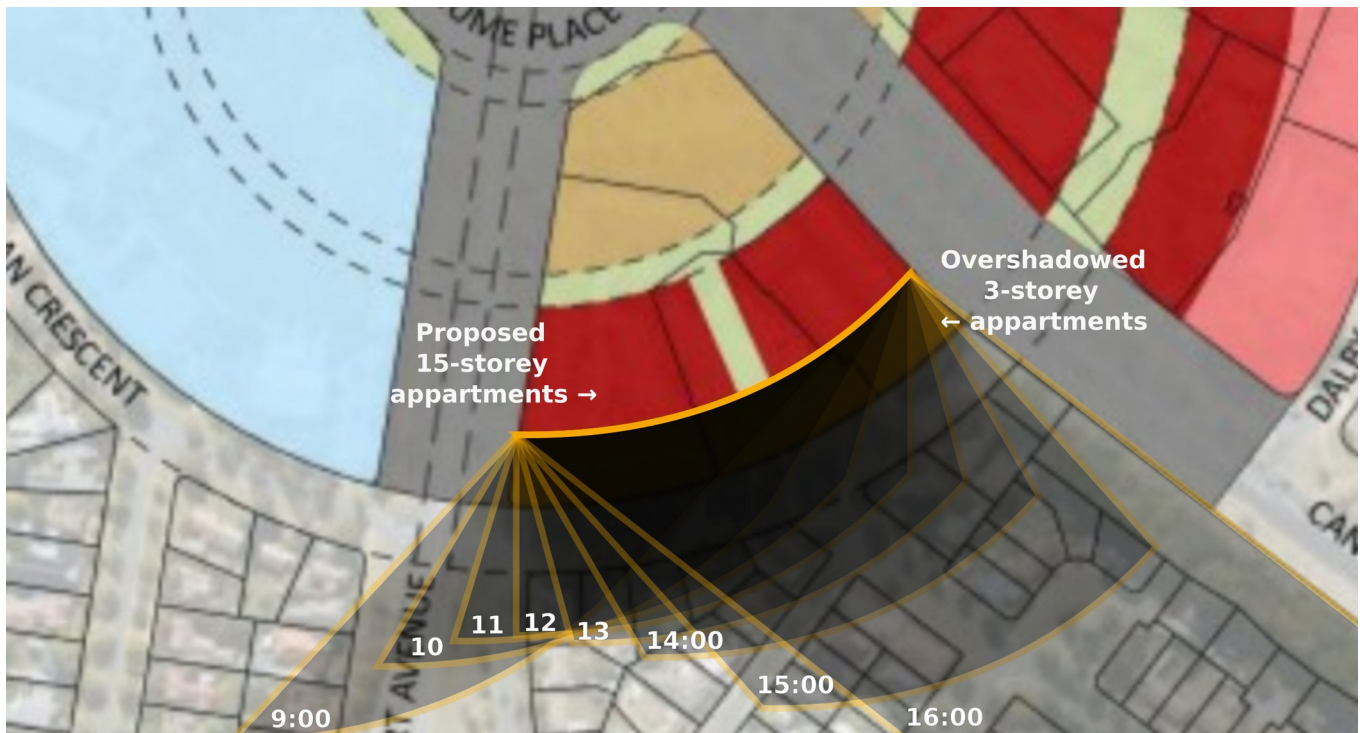
Taken together, the extent and duration of overshadowing represent an unacceptable impact on residential amenity. Even allowing for the land's designation status, the proposal conflicts with well-established planning principles, recent ACT legal precedent, and clear policy intent to protect access to daylight, sunlight, and solar energy for existing residential development.

## Appendix: Hourly winter solstice shadow diagrams

Shown below are shadow diagrams calculated and illustrated based on the following data and assumptions:

- From the proposal building footprint drawing, each illustrated dark red surface represents a building approximately 100m wide on the southern arc, and 60m deep.
- Griffith's contours at McMillan Cr and the RL617 limit yields a building height of approximately 55m, consistent with 15 storeys.
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Building shadow length (m)	192	124	99	92	99	118	169	347



Good morning,

Please find below my submission regarding the National Capital Plan Draft Amendment 102 - Hume Circle Precinct. I own and reside at McMillan Crescent, Narrabundah, and thus would be directly impacted by the proposed amendment. Please kindly acknowledge receipt of this submission via return email. If you have any questions, please contact me via this email address.

*The DA102 proposal for the southern portion of Hume Circle would result in a substantial and unreasonable reduction in direct winter sunlight to established residential properties in McMillan Crescent and Bega Place. The height of the proposed buildings would cast extended shadows over neighbouring dwellings from mid-morning throughout the winter months, significantly diminishing residential amenity and denying residents access to solar energy generation to heat their homes in winter.*

*Development undertaken under the National Capital Plan must uphold reasonable amenity outcomes and protect environmental quality and liveability. These principles are reinforced by contemporary ACT planning policy and legal precedent (for example, Territory Plan Variation 382, criterion 83, reflects a clear policy direction that building height and proximity to existing residential areas must assure minimal overshadowing and protect access to sunlight).*

*Territory Plan Rules R108–R110 further reinforce requirements for solar access, enforcing that development above three storeys provide reasonable sunlight to adjoining residential buildings. The proposal is also not compliant with clauses 14.1 and 14.3 of the Territory Plan because the 15-storey buildings would exceed allowable limits on apartments receiving no direct sunlight on the winter solstice.*

*I understand that designated land allows for designs and planning pathways outside of those codified by the local ACT planning laws. However, designation is intended to enable development that meets a higher civic and design standard appropriate to nationally significant land, **not to justify outcomes that fall below established amenity benchmarks**. Your plan for the southern segment of Hume Circle, as published, disregards the prescriptions of the residential housing development code in ways that would severely undermine the planning principles the National Capital Plan is intended to reflect.*

*Finally, the loss of solar access would also impair rooftop solar generation, directly contradicting Commonwealth and ACT climate and clean energy policy. Large-scale overshadowing of gardens, street trees, and nature strips is inconsistent with Griffin Plan objectives. These impacts have not been adequately assessed or mitigated, and the proposal fails to demonstrate that unreasonable impacts have been avoided. In this regard, the plan for the southern segment of DA102 presents an unacceptable planning outcome.*

Morning,

I am the owner of bega PL, Narrabundah ACT 2604. I am writing to formally express my concern regarding the proposed construction of the new apartment building near my property.

One of the key reasons I invested in my home was the ability to install solar panels and generate clean, renewable energy. My roof currently receives direct sunlight for most of the day, making solar installation both environmentally responsible and financially viable.

However, based on the height and placement of the planned apartment building, it appears that the new structure will significantly block sunlight to my property. This loss of solar access will directly affect my ability to install solar panels and will undermine the long-term sustainability plans I have for my home.

I respectfully request that the planning team review the development's height, orientation, and shadow impact. Ensuring that existing residents retain reasonable access to sunlight is essential, especially as more households transition to renewable energy.

Thank you for taking the time to consider my concerns. I look forward to your response and to a solution that supports both new development and the sustainability goals of current residents.

Sincerely,

Walter Wang

Good afternoon,

I am writing in relation to the draft amendment to DA102 Hume Circle Precinct. My concerns are related to the current road infrastructure in the area.

The goal to create a Hume Circle Precinct, through adding people and future businesses by increasing density.

Operating on the premise of the Griffin's vision of the Hume Circle, I draw attention to the connection between Hume Circle to what is now Russell. This link is obviously not going to be built in the near future, and such has implications for the arterial roads surrounding the roundabout connecting Canberra Ave, Wentworth Ave and Stuart Ave.

As the majority of trips in Canberra are taken by private cars, increased demand will add to the congestion of these arterial roads - to combat this ONLY encouragement of alternate transport (ie public transport, cycling).

Increasing density in the area will increase crossing demand as people walk or cycle to nearby areas and beyond. Crossing high speed, multi-lane roads an extreme risk to pedestrians and cyclists who are disproportionately killed or injured on arterial roads. Adding to urban density to roads currently designed for throughput means you must consider redesigning Canberra Ave, Wentworth Ave, Stuart Ave and the roundabout itself.

In doing so, the NCA must consider the economic benefits of pedestrian friendly infrastructure, as a pleasant place to be increase foot traffic, supports business, and improves property values. Density works best when people want to be there. Failing to consider the road network now will add to the costs of the future.

If the NCA is serious about the future Hume Circle Precinct, it must consider the infrastructure for all users, not just cars. The goal is to add people, not just cars. The NCA must consider the current road infrastructure to move these people safely, not just the cars.

Happy to discuss.

Louis Williamson



# National Capital Plan Draft Amendment 102- Hume Circle Precinct

10 February 2026

## Executive Summary

This submission recommends strengthening of the active travel wording in Draft Amendment 102, specifically by adding active travel to the list of detailed considerations that must be addressed by the NCA prior to works approval. To explain the importance of that recommendation, this submission then provides further information on active travel considerations relevant to planning for the Precinct.

## Introduction

Pedal Power ACT Inc. is Canberra's largest cycling organisation. Among our main roles is advocating for Canberra to be a world leader in cycling for transport, recreation and fitness, and advising government on relevant considerations, including planning matters, to achieve this goal. It is in this context that we are commenting on the proposed draft amendment.

## Requested addition to the draft amendment document

Our primary concern regarding the draft amendment is that, despite what appears to be some recognition by the NCA in the accompanying explanatory information of the need for provision for active travel amenity, these intentions have not carried through into sufficiently clear language in the document itself.

For example, we are strongly encouraged by the inclusion of an active travel section among the 'Questions and answers' part of the draft amendment page on the NCA's website, with the statement *'Active travel will be a key consideration in a development proposal for the precinct - with the detailed design conditions expected to consider new streets, new paths and infrastructure as well as connectivity to the existing network and have regard for active travel infrastructure'*. We also note the emphasis in *Figure 5: Urban Design Concept Review* in the Background Paper on cycling connections between the Hume Circle Precinct and the adjacent Eastlakes development.

However, the language is relatively weak in the draft amendment document itself. The clearest reference to active travel (and only direct mention of cycling) is in Section 4.19.2 Background, which says *'Urban renewal of the Hume Circle Precinct will ...[place] high value on human scale public places that prioritise pedestrians, cycling, and public transport. It will*

*enable more people to live in proximity to ... active travel transport options.* This is welcome, but its placement in the document as background information is insufficient.

**Accordingly, our recommendation is that the detailed considerations that must be addressed by the NCA prior to works approval, listed on the final page, should be expanded to include active travel considerations.** The wording should encompass a wide meaning that would include, for example, end of trip facilities including bicycle parking in both commercial and residential buildings, charging points for e-bikes, and design of internal driveways and pathways to prioritise cycling and walking.

The remainder of this submission covers why this amendment is so important.

### **Replacing driving to and from the Precinct with cycling and walking**

The Hume Circle Precinct is just 3-4 kilometres, mostly via the C2 and Lake Burley Griffin cycle routes, to anywhere in Barton or the southern Parliamentary Triangle precinct or most distant parts of Fyshwick. This is an ideal 'regular clothing' cycling distance. Civic is only seven kilometres away, and there are many other trip generator locations (for example, Manuka, the Kingston Shops and Foreshore, ADFA/RMC via the Jerrabomberra Wetlands path, several schools and local shopping centres) within this range. The Precinct itself will also become an important destination over time that can easily be cycled to from much of Canberra. The increasing take-up of e-bikes will only increase people's willingness to cycle and the distance they are able to ride.

Thus, the location of the Precinct is in an area with enormous potential for active travel, especially cycling, to form a very high proportion of trips originating and arriving in the Precinct, thereby making a significant difference in the expenditure and space that would otherwise need to be allocated to catering for motor vehicle use and parking. This is a golden opportunity that must not be wasted.

### **Active Travel routes**

We are aware that provision of roads and pathways is an ACT Government responsibility, and not the primary focus of this amendment. However, regardless of this, and as indicated by the references to active travel in the NCA's own documentation on this matter, these matters are integral to for planning the precinct and it is appropriate that we briefly raise them here.

#### *Hume Circle Roundabout*

The Hume Circle roundabout is one of the most frightening and dangerous locations in Canberra for cycling; even experienced and otherwise confident riders almost universally avoid it. Additionally, pedestrians and cyclists cannot safely cross its four radiating avenues, as the closest traffic light controlled crossings on all of them are too far away. Consequently,

the often significant and inconvenient detours needed to avoid the roundabout and/or to cross its avenues safely are a major disincentive to walking and cycling through the area.

If this is not addressed, the roundabout and radiating avenues will remain as almost impenetrable barriers, separating the Precinct into four disconnected areas and preventing it from functioning as intended, while also remaining an obstacle to active travel through the area. Noting that this submission is not the place for detailed technical comment on solutions (something that we expect to be involved in) we simply at this time wish to reinforce that this issue will need to be resolved and should be borne in mind in any decision making.

### *McMillan Crescent*

Pedal Power sees completion of McMillan Crescent as a possible opportunity to provide a safe alternative to negotiating the Hume Circle roundabout. It already functions as such, though imperfectly and to a very limited extent, due to its incompleteness and absence of safe crossing points of the avenues where it intersects them.

Properly redesigned and with safe and practical intersections, it could be the key connecting route between different parts of the Precinct as well as being an effective by-pass to the roundabout for active travellers transiting the area.

The main drawback, however, is the clearly long-term nature of the plan and how long it will take to unfold, in an area that needed a solution decades ago and cannot wait further decades to have one implemented. Accordingly, while we would welcome this long-term connection, it cannot be the only plan, and Pedal Power will continue to argue for other, faster solutions to progress the issue as quickly and to the greatest extent possible.

### *Other routes*

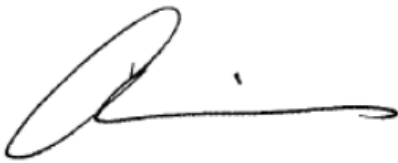
The most important cycle route through the area is the C2 from central Canberra to Queanbeyan, currently fragmented and substandard, but with substantial improvements planned in the near future as a separated cycleway through Kingston and Fyshwick, running parallel to Wentworth and Canberra Avenues through the north-eastern part of the Precinct. Any development here will need to ensure that its space, priority and amenity are not compromised, and we look forward to seeing NCA and the ACT Government working cooperatively to achieve this.

Beyond this, there are many local streets and paths radiating from the Precinct that are not designated as cycling and walking routes but function as such (for example, Leichardt Street and the streets beyond it provide an almost straight-line route to Telopea Park School and southern Barton), and this should also be recognised in future planning.

### **Further consultation**

We note that the NCA's website information included an invitation for community groups to meet with NCA about this consultation. Given that our single recommendation in this submission should, hopefully, be an obvious and uncontroversial one to accept, and our own tight volunteer resources in covering many projects and consultations, we have not taken up that offer regarding this submission. However, we welcome any further opportunity to comment and may seek such discussion in the future, whilst also liaising with the ACT Government in respect of its work in the Precinct area.

Sincerely,

A handwritten signature in black ink, appearing to read 'Cecily Michaels', with a large loop at the start and a long horizontal stroke at the end.

**Cecily Michaels**

Executive Director

Pedal Power ACT

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

I understand the purpose of the draft amendment (DA102) is to enable fundamental changes in the use of the Hume Circle area over time and to ensure it is renewed as a cohesive precinct. I also understand the drivers to be the creation of an eastern gateway to Canberra (from the Monaro Highway/Queanbeyan) and to allow for increased density to achieve housing supply targets.

I don't consider the current DA102 supports these goals effectively.

First, it's not clear to me that Hume Circle is a good location for an entry statement, given the subsequent developments in Canberra since the Griffins' plan. Today, it would be a long time after actually entering the ACT that you would come upon this statement - having passed the light industrial and commercial buildings through Fyshwick, passed a KFC and lower density housing in Narrabundah. If the aim is to capture an entry from the Monaro Highway, the other end of Sturt Avenue, near the intersection with Jerrabomberra Avenue might be a more effective location, with the golf course and comparatively few visible buildings from Hindmarsh Drive.

Second, while appreciating interest in the realising the Griffins' vision, the focus on geometry in DA102 seems unnecessarily constraining. While it might look appealing on a map, existing curved and circular layouts in other parts of Canberra have proven challenging to keep at a human scale, navigate safely (especially for vulnerable road users) and to maintain in a cost-effective manner.

If the Hume Circle location is the only option to be considered, there are changes I would suggest be considered in order to come closer to these goals.

The maximum height proposed seems excessive, especially in comparison to the nearby buildings, and if utilised to the maximum through future developments it would actually prevent achievement of key objectives for DA102.

1. If a key part of the proposed entry statement is the view of Parliament House along Canberra Avenue, this would be would be very challenging to achieve with the building

heights proposed, while also maintaining the schools and the heritage-listed dairy at single story.

2. Given the building heights proposed, it would be almost impossible to see the geometry - it would be obscured by the height of the buildings.

3. Furthermore, if large towers were built, they would dwarf the dairy and risk compromising the heritage value.

4. Large towers would not be in keeping with other nearby developments, including the Kingston Foreshore area and the proposed Causeway development. (Notwithstanding the suggestion that amendments to the Territory Plan to allow greater building heights in the Causeway area.) Accordingly, lower height apartment developments (approx maximum of 4-6 stories) in keeping with existing buildings further along Wentworth Avenue would support delivery of housing supply targets and achieve greater population density, without compromising these objectives. It would allow for a gradual increase in building heights from the low rise residential and commercial buildings.

Secondly, proximity of land available for light industrial uses close to the suburbs and city is not an entirely undesirable feature that shouldn't be done away with. Spaces like the Dairy Rd precinct and a number of the existing business around Leeton Street in Fyshwick show the benefits of having some less developed and accessible (price and location) land for innovative and specialist manufacturing. Some examples, Capital Brewing Co, Barrio, Canberra Distillery, Three Mills, Jasper and Myrtle Chocolate and Thor's hammer). Access to the Fyshwick fresh food markets is also highly valued - combining retail and wholesale. While moderate density residential areas are needed, these can and should be balanced with making sure there is sufficient space for these creative, innovative and economically dynamic uses and users. In short, planning should not strive to entirely separate these concerns, but look for opportunities to allow the links between the two to flourish - supporting economic activity and social activation.

Thirdly, transport links in the area should be a priority - especially at any greater density - and it's not clear these impacts are understood or handled in the proposed amendment. At present, there are major heavy vehicle transport routes using the roundabout and there are many commuters from the Monaro Highway and NSW too. Increasing residential use of the same roads, while also building significant density of housing that would require mass or active travel is a big ask. Buses in the area are at or beyond capacity in peak times. The cycle and foot paths network in the area is desultory. Attempts nearby to bring together multiple modes of transport (eg Bunda St, or the Kingston Foreshore), are not entirely successful. The mishmash of disconnected cycle lanes and foot paths on Eastlake Parade, Kingston, is embarrassing. Riding in on

road cycle lanes is frequently dangerous because of inattention from motorists crawling for parking or stopping illegally to unload passengers into bike lanes or into intersections. Cycling links to NSW definitely need improving. Adding in the requirement to navigate a succession of roundabouts and related intersections to provide the geometric shapes anticipated would be a backwards step. It would reduce safety and discourage active travel, which would be critical to make transport in and out of the greater housing density workable.

Planning in this area should also take greater account of the railway station and forthcoming Causeway housing developments. This includes consideration of a pedestrian and cycling bridge over the railway line to connect the areas, to link up with the lake shared path and give easy access to Kingston Foreshore and the Jerrabomberra wetlands, without the hazard of crossing the rail line or going around. The ongoing role for the railway station is also not adequately considered in the proposed planning amendment. In particular, there should be more consideration of how to connect other transport modes to the train station (eg. future light rail).

Since the draft amendment was released for consultation there have been media articles indicating the NCA was approached by a developer with a proposal that would require similar zoning to that set out in the draft amendment. While there is no suggestion there is anything improper about the submission or consideration of the developer's proposal, any future consultations should include a history of relevant proposals or discussions that the NCA has undertaken with developers in the recent past. This need not include commercially sensitive information. I submit this is the minimum level of transparency expected by ratepayers and should therefore be standard practice.

## **NCA Proposed Draft Amendment 102 – Hume Circle Precinct**

Proposed draft amendment 102 will do little or nothing that the NCA document claims it will do and will certainly not have a positive impact on this precinct. Quite the opposite.

It will severely compromise the amenity of this area, both for people who live or work in the vicinity and for travellers and commuters entering the city along this route. It will compromise the safety of some 2000 high school students who attend St Clare's and St Edmund's Colleges. It will create added traffic congestion to what is already a heavily used route to and from the City. It will add no extra community facilities or green space and will most certainly not be an aesthetically pleasing 'Gateway' that our garden city can be proud of. It will be a chaotic eyesore.

In short, it may create a 'memorable and distinctive sense of arrival for visitors as well as for people who pass through daily' but not in a positive way or a way that will reflect well on this community.

To add insult to injury, it seems that this appalling proposal has nothing at all to do with the Griffin plan, but everything to do with the proposal by a private developer, as noted in the Public Record of Authority Meeting A2025/2 held on 8 April 2025. This would seem to suggest the proposal is being driven by vested interests, rather than 'Design quality and guidance befitting Canberra as the National Capital'.

### Alignment with the Griffin Plan

It seems to me that the proposed amendments DA102 relating largely to the Hume Circle Precinct will do anything but 'reestablish the original Griffin intent'.

As outlined in the NCA's paper, Griffins envisaged that 'Hume Circle would become a major gateway and activity hub, and to link the area to the city through a scenic rail approach route along The Causeway, with a vista to Mount Ainslie. Two rows of medium density mixed-used development encircling the railway station was also intended around Hume Circle, creating a gateway to the Parliamentary Zone'.

It is difficult to see how this Proposed Draft Amendment would 'reestablish the original Griffin intent' – there is already a rail approach to the City as far as Kingston, (although it could hardly be called 'scenic'); the view to Mount

Ainslie is not really a 'vista' and there is already a fair amount of medium density mixed use development in the area, including housing, recreation and commercial.

It seems to me that the Proposed Draft Amendment is trying very hard to justify what amounts to little more than allowing high-rise development with a disingenuous attempt to link it to the Griffin Plan.

#### Improving urban density

The Proposed Draft Amendment links the NCA's proposal to the National plan to improve housing supply and affordability. The Proposed Draft Amendment seeks to achieve this in one way only – high-rise development.

While this may improve housing supply it will do little or nothing to improve housing affordability given the value of real estate in this part of Canberra.

Permitting high-rise development in this Precinct will only add to the existing congestion at the Hume roundabout and surrounding streets and compromise the safety of pedestrians and bicyclists in this area, notably the nearby school students and residents.

#### Land use and public domain

The Proposed Draft Amendment does not clearly indicate how any future development in the Precinct under new guidelines will improve land use and public domain.

If by 'public domain' the NCA includes concepts such as public amenity, areas for public use, connectivity and accessibility, then this Proposed Draft Amendment will most certainly lead to the public domain being seriously reduced as a result of increased traffic congestion, reduced safety, pressure on existing local amenities, aesthetically unpleasant high-rise development and reduced safety for the 2000-odd students who attend St Clare's and St Edmunds School's.

It will only serve as a 'symbolic gateway experience', likely a very frustrating one, for those arriving at the city along Canberra Ave, the majority of whom are commuters from Queanbeyan, Canberrans returning from the coast or the snow or Canberrans accessing Queanbeyan, Fyshwick or the airport precinct for work or access to services.

Another possible outcome of this Proposed Draft Amendment is the degradation of quality of life for nearby Narrabundah and Griffith residents whose streets are likely to become 'rat runs' to avoid the Hume roundabout and circumvent traffic congestion.

The NCA's paper on Proposed Draft Amendment 102 goes to great lengths to justify how such an amendment would go towards 'reestablish[ing] the original Griffin intent and to improve the urban density, land use and public domain surrounding Hume Circle.'

#### Urban design framework proposed by Jega Consortium

It would appear from the Public Record of the Authority Meeting A2025/2 held on 8 April 2025 that the initial idea for this amendment came from Jega Consortium who own two blocks of land in Mildura St. I am also aware that the NCA also met with Jega in December 2024 and October 2023.

I understand that the NCA may consider proposals from private parties, but the fact that this is not even mentioned in Proposed Draft Amendment 102 may indicate an intention to avoid transparency and dispels any illusion that this is a genuine consultation.

In summary, if this Proposed Draft Amendment is approved, it has the potential to seriously compromise the existing area around the Hume Circle Precinct and would, if anything, shift the environment in the Hume Circle Precinct much further away from the Griffin vision that it is now. It would seriously compromise the safety and amenity of those who already live this area, the students who attend the nearby schools and the commuters who rely on this route to get to and from work. It arguably goes little way to addressing affordable housing stock and would create a gateway to our beautiful city that we could only be ashamed of.

# Submission to DA102 Public Consultation – Opposition to Draft Amendment 102

Submitted by:

Ms. Yang

Resident of Bega Place, Narrabundah ACT

Re: Draft Amendment 102 – Proposed 15-storey development

## Executive Summary

I oppose Draft Amendment 102 in its current form. As a resident of Bega Place, the proposed 15-storey development would result in severe and unreasonable impacts on residential amenity, household sustainability and safety.

Key reasons for my objection include:

- Excessive overshadowing, causing loss of winter solar access after approximately 2 pm daily.
- Reduced efficiency of household solar systems.
- Conflict with ACT Government sustainability policy, including the Everyday Climate Choices program.
- Increased traffic and safety risks at Bega Street and the Hume Circle roundabout.
- Misalignment with ACT planning principles relating to solar access, environmental sustainability and neighbourhood amenity.

## 1. Contravention of Existing Solar Access Planning Regulations

Given the proposed 15-storey height and the south-facing relationship between the development site and existing homes in Bega Place, it is evident that the buildings would cast long winter shadows that obstruct sunlight during the key solar-access period from mid-morning through mid-afternoon. This outcome would contradict the principles reflected in clauses 14.1 and 14.3 of the Territory Plan, which aim to prevent situations where nearby dwellings receive little or no direct sunlight during the winter solstice period.

## 2. Significant Solar Access Loss and Overshadowing Impacts

The proposed 15-storey buildings (up to RL617) would block afternoon sunlight to Bega Place for much of the year and completely remove direct sunlight from approximately 2 pm onwards in winter. This represents an unreasonable overshadowing impact inconsistent with established ACT planning principles.

## 3. Interference with Household Solar Systems & Policy Contradiction

My home relies on rooftop solar to reduce grid consumption. The development would sharply reduce afternoon solar generation, undermine ACT climate goals, and increase household energy costs. This contradicts the Everyday Climate Choices program.

## 4. Traffic and Safety Risks

High-density development will increase traffic volumes and safety risks at the Hume Circle roundabout and Bega Place, an area that already experiences congestion and limited visibility.

## 5. Inconsistency with ACT Good Planning Practice

The proposal lacks adequate justification, fails to mitigate overshadowing impacts, and contradicts ACT environmental and urban design principles.

## Conclusion and Requested Decision

I request that the National Capital Authority NOT approve Draft Amendment 102 in its current form. It will significantly worsen overshadowing, sustainability outcomes, safety and general liveability for residents of Bega Place and the surrounding areas.

Sincerely,

Ms. Yang

Resident of Bega Place, Narrabundah ACT

## **Submission to DA102 Public Consultation – Opposition to Draft Amendment 102**

Submitted by:

Mr. Chan

Resident of Bega Place, Narrabundah ACT

Re: Draft Amendment 102

### **Executive Summary**

I am writing to oppose Draft Amendment 102. The proposed 15-storey development poses unacceptable impacts on surrounding residential areas, including overshadowing, reduced solar performance, increased traffic risks, and inconsistency with ACT sustainability objectives. As a resident of Bega Place, I am directly affected by these foreseeable impacts.

Key concerns include:

- Loss of afternoon winter sunlight due to excessive building height.
- Reduced generation from existing rooftop solar systems.
- Increased energy consumption inconsistent with sustainable-living policies.
- Traffic and safety risks at Hume Circle and adjoining streets.
- Conflict with established ACT planning principles and renewable-energy policy directions.

### **1. Solar Access and Overshadowing Impacts**

Bega Place is positioned directly south of the proposed high-rise structures. Buildings of up to 15 storeys will cast extended shadows across the neighbourhood during winter. Afternoon sunlight, already limited in winter, would be almost entirely blocked after early afternoon, reducing natural light and contributing to colder living conditions.

### **2. Conflict With ACT Solar Access Principles and Planning Intent**

The Territory Plan contains principles intended to avoid unreasonable overshadowing. Although these do not strictly apply to NCA-designated land, they provide a clear policy signal. The height proposed for DA102 substantially exceeds what is typically permitted near residential zones under Variation 382, which requires evidence of minimal overshadowing - standards the proposal does not meet.

### **3. Traffic, Movement and Safety Implications**

Canberra Avenue continued to be one of the ACT's major crash hotspots across early 2025. High traffic volumes, speed variability and complex turning movements contribute to repeated collisions along this corridor.

Recent serious incidents include a pedestrian collision near St Edmund's College on 28 March 2025, and a serious single-vehicle accident near Woods Lane on 24 April 2025. Despite renewed public calls for interventions, including 40 km/h zones near schools, no permanent safety measures have been implemented.

Adding high-density development directly adjacent to this already dangerous corridor without clear mitigation measures risks worsening an unsafe road environment.

#### **4. Impacts on Household Solar Systems and Sustainability**

My home uses rooftop solar to reduce energy consumption and support ACT emissions targets. Losing sunlight after approximately 2 pm would sharply reduce winter solar generation. This contradicts the intent of the ACT Government's Everyday Climate Choices program and increases household energy costs.

#### **5. Lack of Alignment With Good Planning Practice**

The proposal does not address overshadowing impacts, traffic issues, or sustainability considerations, and its scale appears inconsistent with responsible ACT planning principles.

#### **Conclusion and Requested Decision**

For the reasons above, I request that the National Capital Authority NOT approve Draft Amendment 102 in its current form.

Sincerely,

Mr. Chan

## Executive Position

I object to Draft Amendment 102 in its current form on the basis that it would result in severe and disproportionate winter overshadowing of established residential properties along the southern side of McMillan Crescent and Bega Place, including my own property.

Although the draft amendment incorporates a stepped building form (3 storeys transitioning to 15 storeys), the attached winter solstice modelling demonstrates that this transition is geometrically inadequate to mitigate winter solar impacts.

The proposed building envelopes in the southern segment of Hume Circle are not supported by sufficient impact assessment, do not demonstrate effective mitigation of off-site impacts, and risk constituting an unreasonable diminution of residential amenity inconsistent with the objectives and principles of the National Capital Plan.

### 1. Statutory and Planning Context

While the National Capital Plan does not replicate the ACT Territory Plan's prescriptive solar access provisions, the National Capital Authority remains obliged to:

Act consistently with the objects of the Australian Capital Territory (Planning and Land Management) Act 1988;

Promote high standards of urban design;

Avoid unreasonable adverse impacts on adjoining land;

Properly consider all relevant material impacts.

The absence of codified solar access rules does not remove the obligation to assess and mitigate significant off-site impacts. On the contrary, it increases the responsibility of the Authority to demonstrate that impacts on established residential areas are reasonable, proportionate, and justified.

Failure to adequately consider material amenity impacts — particularly where supported by modelling evidence — risks constituting a failure to consider relevant considerations.

### 2. Winter Overshadowing Impacts

The attached Appendix: Hourly Winter Solstice Shadow Diagrams models the shadow cast by the proposed southern 15-storey building envelope (approximately 55 metres in height).

Using June 21 solar azimuth and elevation data:

Solar elevation between 9:00 am and 3:00 pm ranges from approximately 16° to 29°.

Resulting shadow lengths range from approximately 92 metres to 192 metres.

These shadow lengths extend across McMillan Crescent and over dwellings on its southern side.

The modelling demonstrates:

Overshadowing of southern-side McMillan Crescent dwellings from approximately 9:00 am through at least 3:00 pm;

Complete noon overshadowing of certain properties;

Extensive duration of shadow during the most climatically sensitive period of the year.

This is not marginal solar reduction. It represents prolonged and substantial winter solar deprivation affecting established residential dwellings, including my own property.

### 3. Inadequacy of the Proposed 3-Storey Transition

The draft amendment includes a stepped form consisting of a 3-storey frontage element with a 15-storey structure behind it.

While the inclusion of a stepped interface is acknowledged, the modelling demonstrates that it does not meaningfully mitigate winter overshadowing impacts.

At low winter solar angles:

A 3-storey element (approximately 10 metres high) cannot shield adjacent dwellings from a 55-metre structure positioned directly behind it.

The shadow cast by the 15-storey element geometrically overwhelms the shallow transition.

The depth of the step-back is insufficient relative to the shadow envelope.

In effect, the stepped arrangement is visually transitional but functionally ineffective in winter conditions.

A transition only satisfies its planning purpose if it materially reduces bulk, scale, and solar impact. Here, the winter modelling demonstrates that it does not.

#### 4. Height Placement and Urban Design Logic

The core issue is not simply height, but the placement of maximum height at the southern edge of the precinct.

Positioning the tallest building mass immediately north of established low-rise residential dwellings:

Maximises winter shadow reach;

Concentrates solar loss on existing homes;

Imposes disproportionate impact on adjoining land.

A more rational urban design approach would involve:

Locating the tallest mass toward the northern portion of the precinct;

Increasing setback depth for upper storeys;

Introducing a more graduated height transition;

Demonstrating through comparative modelling that alternative configurations were assessed.

The draft amendment does not provide evidence that less intrusive massing options were considered.

#### 5. Renewable Energy and Policy Inconsistency

The overshadowing impacts will materially reduce the performance of rooftop photovoltaic systems on affected dwellings.

This outcome sits in tension with:

The Commonwealth's Small-scale Renewable Energy Scheme;

ACT emissions reduction targets;

Broader policy objectives promoting distributed renewable energy.

Permitting development that significantly reduces established solar generation capacity without clear justification is inconsistent with contemporary climate and energy policy settings.

#### 6. Proportionality and Impact Distribution

The amendment delivers development uplift within the precinct while externalising significant amenity impacts onto neighbouring low-density residential land.

Residents of McMillan Crescent:

Receive no benefit from rezoning;

Bear permanent loss of winter sunlight;

Experience diminished live ability and solar generation; Face potential property value impacts arising from reduced amenity.

Sound planning requires proportionality between benefit and burden. That balance is not achieved in the current configuration.

#### 7. Requested Outcome

Given the demonstrated inadequacy of the stepped form and the extent of winter overshadowing shown in the attached modelling, I respectfully request that the NCA:

Reconsider the placement and height of the southern building envelopes;

Require revised massing that demonstrably protects reasonable winter solar access to McMillan Crescent;

Publish comparative shadow modelling of alternative configurations;

Ensure that transitional height controls operate effectively in winter conditions, not merely in plan form.

Absent substantive revision, Draft Amendment 102 represents an unreasonable and inadequately justified planning outcome in respect of adjoining residential amenity.

Regards

Steven

## **Submission to DA102 Public Consultation – Opposition to Draft Amendment 102**

Submitted by:

Miss Deng

Resident of Bega Place, Narrabundah ACT

Re: Draft Amendment 102 – Proposed 15-storey development at McMillan Cres

### **Introduction**

Thank you for the opportunity to comment on Draft Amendment 102. I am a resident of Bega Place and am deeply concerned about the scale and impacts of the proposed development. In its current form, DA102 does not adequately consider liveability, sustainability or the safety of the surrounding community.

### **1. Loss of Sunlight and Residential Amenity**

The construction of 15-storey towers at Hume Circle will cast extensive shadows over nearby homes. For Bega Place, winter sunlight would be lost from early afternoon, reducing warmth, increasing energy costs, and affecting gardens and the enjoyment of outdoor areas.

### **2. Impact on Household Solar Energy and Living Costs**

My home relies on rooftop solar to reduce energy consumption. Losing sunlight after approximately 1 pm results in significant loss of renewable-energy production, especially in winter. This directly undermines ACT Government sustainability guidance that encourages residents to reduce emissions and improve household efficiency.

### **3. Traffic and Safety Risks**

Canberra Avenue remains one of the ACT's highest-risk crash corridors. In early 2025 alone, two major incidents occurred, including a serious pedestrian collision involving St Edmund's College students and a separate crash near Woods Lane resulting in hospitalisation.

These incidents highlight longstanding safety concerns, yet no effective long-term safety measures have been introduced. Introducing high-density development at Hume Circle will increase vehicle movements into an already dangerous road corridor.

### **4. Community Character and Planning Intent**

The height and density of the proposed development are significantly out of scale with surrounding residential areas. Good planning requires change to be integrated sensitively, respecting existing neighbourhood character and avoiding unreasonable impacts such as overshadowing.

## **5. Gaps in Assessment and Planning Justification**

The proposal lacks sufficient assessment of overshadowing, traffic impacts, and sustainability considerations. Without this analysis, the proposal does not demonstrate that it aligns with planning principles or community expectations.

## **Conclusion**

For these reasons, I respectfully request that Draft Amendment 102 NOT be approved in its current form. The overshadowing, traffic risks and sustainability impacts are significant and unresolved.

Regards,

Miss Deng

To whom it may concern,

Please accept this email as my submission to the consultation on the National Capital Plan Draft Amendment 102 - Hume Circle Precinct.

I grew up in Griffith and although my family and I have now relocated to Tuggeranong I regularly travel along Canberra Avenue. I believe that the amendments proposed would result in catastrophic over-development of this precinct.

There is already heavy traffic in this area, not only at peak hour. Such overdevelopment would amplify traffic congestion in this area. Furthermore, this development would increase risk of accidents and pose an unacceptable risk to the 2000-odd students at St Claires and St Edmunds Colleges. We have already had a serious accident on this road that resulted in serious harm to two St Edmund College boys and which has resulted in the need for a pedestrian crossing.

The proposal to allow 15 storey buildings to be erected in this area is outrageous. Such development belongs in town centres such as Woden, Belconnen, Tuggeranong and Gungahlin. Areas such as Kingston and Narrabundah do not have, and should not have, the infrastructure to support such development. This development would also result in inappropriate and aesthetically destructive levels of building, stress on local facilities and a diminution of green space in what is essentially a leafy, low-rise and medium density area.

I fail to see how this proposed Draft Amendment would be a welcoming 'Gateway to the City'. Canberra is known as the 'Bush capital' however, we continue to reduce our tree coverage. If we allow such developments in our suburbs we will continue to lose our unique biodiversity (trees, birds, wildlife etc). Not only would it be a frustrating eye-sore it would be counterintuitive to what we are known for (our access to nature).

In conclusion, this development would send a negative impression to visitors arriving in Canberra, strain existing infrastructure, and present unacceptably increased risks and delays at this already busy intersection.

Thank you for your time.

Dr Lily O'Donoghue Jenkins

To whom it concerns,

I am writing regarding Draft Amendment 102 for the Hume Circle precinct, which I do not support. I purchased my apartment at Leichhardt Street in 2022, during a period of significant housing price increases, and I made that decision carefully. One of the key reasons I chose this area was the character of Kingston itself. I have lived here since 2017 and have grown to love the medium-density environment, the tree-lined streets, and the proximity to nature, including the wetlands and the lake.

I deliberately chose Kingston because I did not want to live among high-rise towers like those in the city centre. The proposal to allow buildings up to 15 storeys in this precinct represents a major shift away from what I understood Kingston to be when I made my home here.

Despite the scale of this proposed change, no information has been provided to affected owner-occupiers about the potential impacts. This includes possible changes to land rates, the risk of losing established medium-density housing, and the broader consequences for community cohesion. For those of us who have invested in and contributed to this neighbourhood, the lack of clarity is deeply unsettling.

I also find it concerning that the Hume Circle roundabout is being compared to areas such as Canberra Airport or the land surrounding Lake Burley Griffin. These comparisons do not reflect the established character, scale, or community expectations of Kingston. This proposal feels misaligned with the identity of the suburb and with the understanding many residents had when choosing to live here.

In addition to these concerns, I am worried about the safety implications of the proposed increase in local traffic. The intersection of Leichhardt Street and Wentworth Avenue is already a high-collision area, and introducing significantly more vehicle movements will only heighten the risks for pedestrians, cyclists, and residents. This part of Kingston is heavily used by people walking, cycling and driving from the Fyshwick markets. In the years I have lived here I have observed a considerable amount of near misses and crashes including nearly being hit myself when I was on a bicycle. I fear that increased traffic volumes will make the area less safe and less accessible for the community.

Overall, I am disappointed that such a significant change is being considered without clearer regard for the existing community, keeping owners and residents informed and the values that make Kingston unique. I hope you will take these concerns into account as you consider the amendment.

Kind regards,

Aaron and Carly

To whom it may concern.

I am writing in response to the call for submissions for **National Capital Plan Draft Amendment 102 - Hume Circle Precinct**. I am a resident inside the area defined by DA102, residing at Griffith, and feel that this proposal very directly impacts me.

Renewal in a local area is always exciting. Improved housing supply will bring with it increased possibilities for community features, such as improved traffic management, new community areas, shops and public features, easier access to public transport, and so on. Renewing an area to providing more infrastructure and support is a noble goal, and the outcomes of which will serve to benefit both local residents and the general community.

However, I would like to note my concern with the building height limits that are outlined in this proposal. Setting the building height at a maximum 15 stories feels excessive for the community. There are very few, if any apartments currently, in the local area that are in excess of 8 stories now, and the NCA's proposition to double this limit feels quite excessive. The closest comparable buildings to this proposal are a fair distance away in Telopea Park, and these are still much less than the maximum suggestion of 15 stories. Such height would not integrate well with the current architecture, and overall does not feel consistent with the current feel and capacity of the neighbourhood.

Further to this, adding this much housing without consideration to other important aspects of community life - e.g. school capacity, traffic management, water and sewerage, community healthcare, to name a few - creates the potential for the planned benefits from the local development to have no positive impact at all, and instead solely exist to offset the negative impacts from the increased population in a small area.

I am of the opinion that the Chief Planner and the NCA should revise the proposal to lower the approved height limits. This would allow development to better integrate with the existing neighbourhood architecture, and provide a more positive vision for community renewal. Residential and mixed-use building heights of 3-6 stories would enable the NCA to achieve the same renewal goals and provide significant improvement to housing supply and community features without overburdening the existing local services.

Thank you for your consideration to this submission,

To the Chief Planner and whom else it may concern,

I am writing in response to the call for submissions in response to the public consultation on the matter of the **National Capital Plan Draft Amendment 102 – Hume Circle Precinct**.

The proposed changes under DA102 to enable the renewal of the area are exciting in the possibilities it offers to prepare the area for population growth and quality of life into the future. Improved housing supply, improved traffic management, extended and improved foot and cycle paths, easier access to public transport (R2, R6 and 56 buses), and general renewal of current light industrial areas are all excellent goals and would benefit the local residents and general public alike.

I would like to note my **concern and opposition over the unprecedented building height limits** proposed on page 25 of DA102. There are no existing buildings nearby that come close to 12 and 15 storey limits that are proposed by this amendment, and very few that come close to the 8-storey limit. The closest comparable buildings are streets away (indeed off of the included map) near Telopea Park and these are still less than the maximum suggestion of 15. Such buildings would not integrate with the existing feel and capacity of the neighbourhood, and erode the benefits to traffic management and access to services that are outlined as objectives of this renewal proposal.

The Chief Planner and NCA should reconsider the proposal and revise and lower the building height limits to better integrate with the existing neighbourhoods and the vision for renewal. Residential and mixed-use building of 3 to 6 storey will achieve the same goals of renewal and a very significant improvement to housing supply without overburdening the local services – schools (very little public schooling is available nearby), roads, healthcare and medical centres, water and sewerage, off street parking, and retail etc.

Thank you for accepting this submission as part of the public consultation process.



# **ANDREW** PROPERTY GROUP

## **NATIONAL CAPITAL PLAN DRAFT AMENDMENT 102 HUME CIRCLE PRECINCT**

### **SUBMISSION**

Andrew Property Group  
Andrew Arcade Unit 3 42 Giles Street  
KINGSTON ACT 2604  
Contact: Chris Andrew - Director and General  
Manager

Chief Planner  
National Capital Authority  
GPO Box 373  
CANBERRA ACT 2601  
[draft.amendment@nca.gov.au](mailto:draft.amendment@nca.gov.au)

16 February 2026

## **INTRODUCTION**

Andrew Property Group is the registered Business Name for J. Andrew & Son Pty Limited.

J. Andrew & Son Pty Limited holds land interests in the Hume Circle Precinct.

Crown Lease over Block 14 Section 26 Griffith

Crown Lease over Block 15 Section 26 Griffith.

The whole is leased to a commercial tenant

Address: 123-125 Canberra Avenue Griffith ACT.

## **EXECUTIVE SUMMARY**

An outline of the issues is summarised as follows:

- a) A balance of mixed use development with integration of different land uses as per Land Use A to be incorporated across the whole Hume Circle Precinct without an emphasis on residential
- b) The original circular boundary vision for the Hume Circle Precinct to be established with urban density development to align with and be dictated by the circular geometry of Hume Circle
- c) Development project heights to be consistent with the Griffin urban scale and complement the heritage listed "Dairy Farmers" building with no comparatively excessive building heights
- d) Redevelopment to avoid adopting a broad scale approach but aim to support the re-purposing and integration of existing buildings where feasible and appropriate with development projects
- e) Address development across the Hume Circle Precinct as a whole consistent with the Griffin Plan vision and avoid massed areas of excessive, congested and over-planned density.
- f) Consideration given to the interests of all stakeholders equally with due consideration given equally to the integration and consistency of NCA and ACT Government planning policies

## **CONTENT COMMENTS**

1. **DA102 was released at a time that limited the timeframe available to properly review, assess and evaluate the Draft Amendment and prepare and lodge a detailed and appropriate submission. Noting that certain stakeholders in the Hume Circle Precinct were not made aware of DA102 until February 2026.**

The timing and adequacy of the consultation process has limited this submission. We do not consider sufficient time has been allowed for proper review and consideration, nor to engage consultants to fully evaluate the National Capital Plan Draft Amendment 102 – Hume Circle Precinct (DA102) and prepare a detailed submission. Release of DA102 for public consultation was advised on 5 January 2026 – with submissions closing 3 February – then extended to 17 February 2026. The release of DA102 coincided with the Christmas-New Year holiday period and office closures, and with many consultancy offices not reopening until 27 January 2026, this provided a relatively short timeframe of 16 business working days for the evaluation of DA102 and preparation of a complete submission. .

- 2. Evident is a noticeable reliance on the National Planning Reform Blueprint objective to “improve housing supply and affordability” through encouraging redevelopment of the Hume Circle Precinct to accommodate medium/high density housing. The area was planned to be a place of urban density with a diversity of land uses – not an area to be dominated by medium and high density residential aimed at increasing housing supply**

Whilst DA102 references the Griffin Plan and reinstating the Griffin Plan, and the need for urban regeneration and development to align with the Griffin Plan vision, there appears to be particular emphasis on residential development and housing supply within the Hume Circle Precinct - specifically multi level apartments. Residential buildings of up to 15 storeys in the Hume Circle location do not accord with the Griffin Plan and the Griffin vision of low building heights and garden city principles. The objective of DA102 is to achieve urban renewal and increase urban density; however the focus is clearly encouraging residential development.

There is minimal discussion in DA102 regarding proposed “mixed land use” development other than residential, nor how “mixed land use” development other than residential is to be incorporated and integrated within area intent to be dominated by development of medium and high density housing. Proposed areas allowing residential buildings of up to 15 storeys in close proximity potentially resulting in excessively populated and densely compacted projects with limited amenity is not sound planning, with the possibility of adjacent sites and existing facilities being adversely impacting. Apart from DA102 randomly mentioning “mixed land use” and Land Use A areas are identified on Figure 146, only the Land Use A list provides an insight to what other permitted “mixed” uses are proposed for land within the Precinct.

*As stated under Questions and Answers – referencing the focus on housing development  
Question – “Why is this change proposed?”*

*Answer – part of answer .....“DA102 will increase housing supply and enable mixed use and residential development and contribute to housing supply”*

- 3. The understanding is developers have purposely land-banked land within the Hume Circle Precinct with the expectation such acquired land in the Precinct – land which is the subject of DA102 - will be rezoned for medium and high density development.**

DA102 confirms developer’s expectations by proposing allowable building heights of up to 15 storeys and including “residential” as a permitted DA102 land use as per the scope of Land Use A that DA102 proposes to apply to the Hume Circle Precinct. DA102 also proposes broad development concepts aimed to encourage large scale development – and supposedly predominantly large scale residential development across what is effectively about 75% of the Hume Circle Precinct. Crown Lease holders and developers stand to benefit substantially from engagement and involvement in the Precinct’s proposed regeneration.

It is not known to what extent developers in general, and specifically developers and other commercial entities with an interest in the Hume Circle Precinct through holding Crown Leases over land, have been consulted, or provided input, or been involved in the drafting of DA102, or in setting the consultation process and arrangements. As one such Crown Lease holder, we were not consulted and have not been involved. Full details of any relationships or agreements or involvement between the NCA and ACT Government and any Crown Lease holders and developers must be disclosed in the interests of transparency and independence

**4. Existing Crown Lease holders within the Hume Circle Precinct – particularly holders of land with low scale industrial development – are basically regarded as having no other options than to demolish and redevelop the land, or sell the land to developers.**

DA102 does not give due consideration to the future of Crown Lease holders within the Hume Circle Precinct not wanting to redevelop but retain existing developments for permitted and allowed uses. Instead, DA102 proposes broad scale redevelopment of the Precinct in the north, south and east sectors with a significant land area currently characterised by low scale industrial developments to be replaced with high build height development.

Land within the precinct with low scale industrial developments is seen by DA102 to now have no place or purpose or future use in the Precinct. The long term viability and use of existing low scale industrial development cannot be dismissed on the basis that it was not a Griffin vision for the Precinct; that such facilities have become aged; that someone with limited vision assumes existing supposedly aged facilities are unsuitable for contemporary uses; and that the land is now seen to only represent potential redevelopment opportunities for developers.

Opportunities exist to re-imagine the purpose and utilisation of existing developments in ways consistent with contemporary planning policy. Three Mills Bakery, Thor's Hammer and Power Kart Raceway have successfully re-imagined and re-purposed existing low scale industrial buildings to accommodate contemporary uses in accord with planning policies and objectives. Significant capital investment in buildings and businesses has resulted in productive and sustainable ventures which have improved the amenity of the Precinct and contributed to greater community activity and involvement in the area.

Sites such as 125 Canberra Avenue - Block 15 Section 26 - a once industrial warehouse of basic characteristic has undergone extensive refurbishment and upgrade to be re-imagined and re-purposed to operate successfully and viably as an Indoor Recreation Facility – a land use consistent with contemporary planning policy in respect of the Territory Plan and the proposed DA102 Land Use A listing. The exterior of the building has also been significantly upgraded and the facility is projected as a prominent low scale building at the intersection of major arterials - Canberra, Wentworth and Sturt Avenues – at the gateway to the city.

The land use - Indoor Recreation Facility - is a suitably adapted functional and purposeful contemporary use for the building, a permitted use under the Crown Lease, a use consistent with the Territory Plan, and a use included within the scope of permitted uses for land within the Hume Circle Precinct as designated by the itemised Land Use A listing in DA102. Long term occupancy of the premises by the current tenant in the building situated at 125 Canberra Avenue is subject to a commercial lease allowing for continuation of tenure through to 2047.

As stated under *Questions and Answers – referencing how existing development is viewed*

*Question – “Why is this change proposed?”*

*Answer – part of answer in relation to the Hume Circle land – “...land largely developed for low scale industrial uses. As these existing facilities age and become unsuitable for contemporary use there is an opportunity to re-imagine Hume Circle and adjacent land in a manner that is consistent with contemporary planning policy and the original vision for Canberra”*

- 5. It is s unrealistic and dismissive to assert that entities or persons who have an interest in the Hume Circle Precinct - whether it be as Crown Lease holders over land or owners of existing businesses operating within the Hume Circle Precinct - will not be impacted by the changes proposed in DA102**

As stated under *Questions and Answers – referencing DA102 will not impact current land use*

*Question – “What does this mean if you are a lessee in the proposed precinct”*

*Answer – “The proposed changes do not require lessees to change their day-to-day activities.*

Whilst the interpretation and understanding of DA102 is that the continued operation of the Indoor Recreation Facility at 125 Canberra Avenue can continue if DA102 is approved and implemented, rezoning and redevelopment of land in accord with DA102 will allow development projects with building heights of 8 and 15 storeys on adjoining land which will overshadow the facility. The business has pursued operational sustainability through integrating economic, environmental and social responsibilities into everyday operations and long term strategies – and has committed significant investment in a solar panel installation of sizable capacity.

Not only will building construction on adjoining land be disruptive to day-to-day operations of the business, but shadowing from adjoining buildings of comparatively excessive height will reduce the effectiveness and cost benefit gains anticipated from solar generated power use. This will inevitably affect the day-to-day activities of a business that consciously adapted its operation to meet sustainable contemporary targets and show social and environmental responsibility by adopting solar power as the operational mainstay for the business.

Furthermore, the rezoning of land which subsequently allows a greater scope of permitted uses - in this case uses in accord with the Land Use A proposed in DA102, and particularly residential – typically and undoubtedly will result in Unimproved Land Value (ULV) increases for most, if not all, land within the Hume Circle Precinct. With ULV being the valuation base for determining General Rates and other charges (PFSEL) any increase in ULV will necessarily result in a direct increase in land holding costs for Crown Lease holders and an indirect increase in operating costs for businesses.

Lessees faced with higher overheads will necessarily have to change day-to-day activities in respect of revising strategies to maintain day-to-day operational efficiency, profitability, liquidity, solvency and return-on-investment, and address inherent risk tolerance.

- 6. The Griffin Plan vision is of a geometric circular shape for the Hume Circle Precinct encompassing Hume Place at the centre of the Precinct with Hume Circle defining Precinct boundary. DA102 aims to realise the Griffin vision for Hume Place, Hume Circle and the Hume Circle Precinct however depicts the Hume Circle Precinct as extending beyond the Griffin intent of Hume Circle bounding the Hume Circle Precinct.**

DA102 is proposed as an opportunity to re-establish the original Griffin intent and to improve the urban density, land use and public domain surrounding Hume Place. However the land areas of Dalby Street to the west and part of Mildura Street to the south identified as part of the Hume Circle Precinct in DA102 (Figure 145) detract from establishing the original Griffin intent of Hume Place surrounded by a uniformly circular network identifying Hume Circle, and with Hume Circle representative as the outer boundary of the Hume Circle Precinct.

The DA102 proposed development area outside the geometry of Hume Circle -- the area bounded in part by Mildura Street, Dalby Street, Canberra Avenue and the outer rim of the visually completed Hume Circle should be removed from the Hume Circle Precinct in order to define a circular Hume Circle Precinct consistent with the original Griffin intent. Figure 146

DA102 proposes re-establishing Hume Circle to its envisaged circular context by extending McMillan Cres in the north through a circular continuation to Mildura Street to extend the conceptual circle in part. This sets the precedent to justify extending McMillan Cres in the south through a similar circular continuation to join Mildura Street, thereby establishing Hume Circle in its circular entirety, and establishing and enabling Hume Circle to be set as the Hume Circle Precinct boundary in accord with the Griffin intent.

**7. The NCA sees Hume Circle becoming an area with unified landscape and build form and DA102 proposes to restore and emphasise the Griffin vision – to have consistency of urban density redevelopment across the entirety of the Hume Circle Precinct**

Uniformity of urban density contained within and across the whole of the Hume Circle Precinct with Hume Circle at the centre and development defining the Hume Circle circumference and characterising the Hume Circle Precinct as a circular precinct – with development extending northward along what is now Wentworth Avenue - was envisaged by the Griffin Plan as indicated on Figure 1 included in the DA102 document – an extract from the Griffin Plan.

The NCA vision as replicated in DA 102 Figure 146 departs from the Griffin Plan vision of uniformity of urban density and land use. Large land areas in the north, south and east land sectors of the Hume Circle Precinct are designated for Land Use A which can reasonably be assumed will be dominated by high build residential development within a radial and inner network. In contrast, the western sector is characterised by the open space and low scale development comprising the grounds of St Clare's, and without any radial or inner network.

**8. DA102 proposes the imposition of detailed development conditions aimed at achieving design excellence, but there should also be consistency of build height across the whole Hume Circle Precinct for design excellence to be showcased**

Whilst new development projects in the Hume Circle Precinct will be subject to detailed development conditions aimed at embedding each project with design excellence there needs to be appropriate visual and structural integration across the whole Hume Circle Precinct of new development projects, and integration with existing buildings. Yet the NCA has chosen to deal with areas within the Precinct in isolation and without clear commitment to ensure and maintain uniformity and consistency of building height and design and integration.

Depicted in Figure 147 is proposed high density development areas comprised of building heights of up to 15 storeys in the north, east and south sectors of the Precinct contrasting with the open spaces of the western sector bounded by Stuart Avenue, McMillan Crescent and Canberra Avenue. Absent will be the uniform integration of building heights across the whole Precinct. The Griffin intent for a planned structural geometric form for the Hume Circle Precinct with uniformity of development height and design in identifying the Hume Circle circumference and characterising the Hume Circle Precinct - will not be achieved.

Building massing and building form proposed for part of the land the subject of DA102 does not reflect the Griffin intent nor does the planning and design framework proposed in DA102 accord with the Griffin vision of Hume Place, Hume Circle and the Hume Circle Precinct creating a uniformly defined gateway to the city and the Parliamentary Zone.

**9. Historically, traffic issues associated with the Hume Circle roundabout are well documented, however anticipated increased traffic volume and traffic problems as a result of the increase in urban density proposed by DA102 are not addressed by NCA**

High density (residential) development proposed for a significant area of the Hume Circle Precinct will significantly increase people and vehicle numbers commuting through the area and accessing and egressing the area via the Hume Circle roundabout. The roundabout is one of the most accident prone roundabouts in the ACT, and with traffic volume expected to increase as a result of DA102, traffic congestion will worsen and accidents increase.

The NCA gives no consideration to the increased demands on the existing road network and DA102 makes no provision for road improvements to surrounding roads or the Hume Circle roundabout. The NCA instead places responsibility with the ACT Government for roads and traffic within the Precinct and for required infrastructure improvements to support what is envisaged to be significantly increased traffic volume and movement.

As stated under *Questions and Answers – referencing the forgotten roundabout*  
*Question – “Will Hume Circle roundabout remain”*

*Answer – “DA102 does not propose any specific changes to the Hume Circle roundabout but would enable change to be considered as part of future development proposals”.*

## **CONCLUSION**

- a) The National Capital Plan identifies a series of matters of national significance - one being “to respect the geometry and intent of Griffin’s formally adopted plan for Canberra”
- b) Redevelopment and renewal of the Hume Circle Precinct as an example and vision of urban regeneration in the context of the original Griffin Plan is acknowledged.
- c) Implementing proposals should give due consideration to the Griffin Plan geometry and intent in respect of providing a uniform and unified landscape and built form with land use diversity.
- d) DA102 is an opportunity to reinforce the Griffin vision for the Hume Circle Precinct through visionary planning and implementation consistent with the Griffin geometry and intent.

Chris Andrew  
Director - General Manager  
J. Andrew & Son Pty Limited  
Andrew Property Group

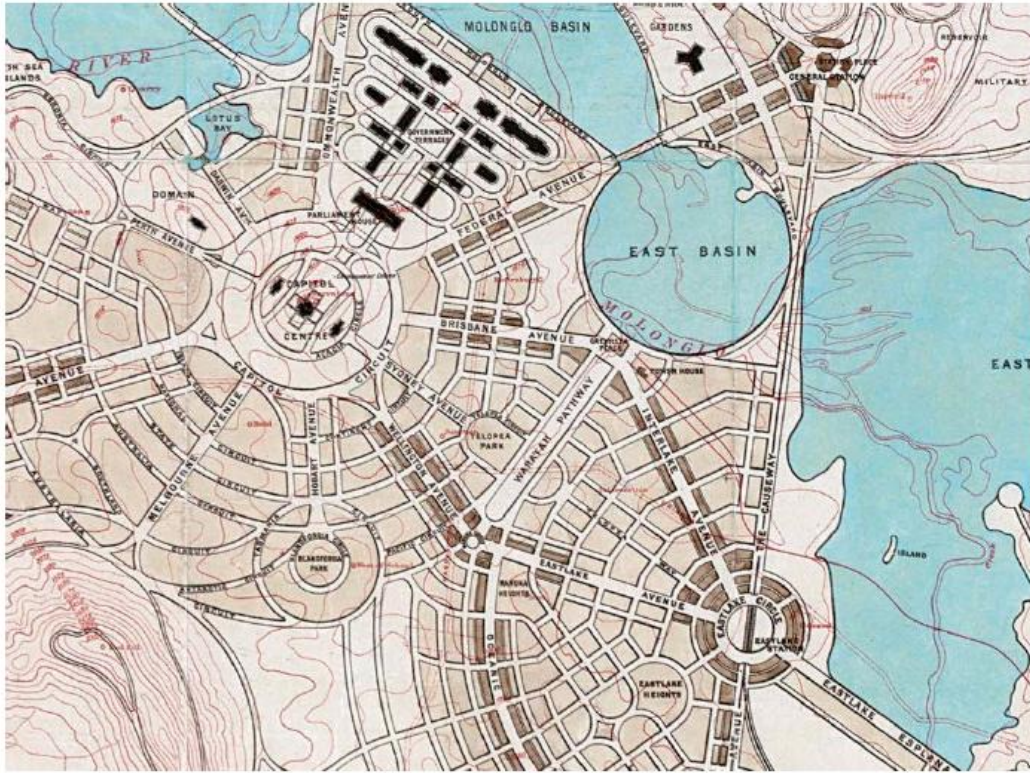


Figure 1: Extract from Griffin plans (Hume Circle referred to as 'Eastlake Circle')

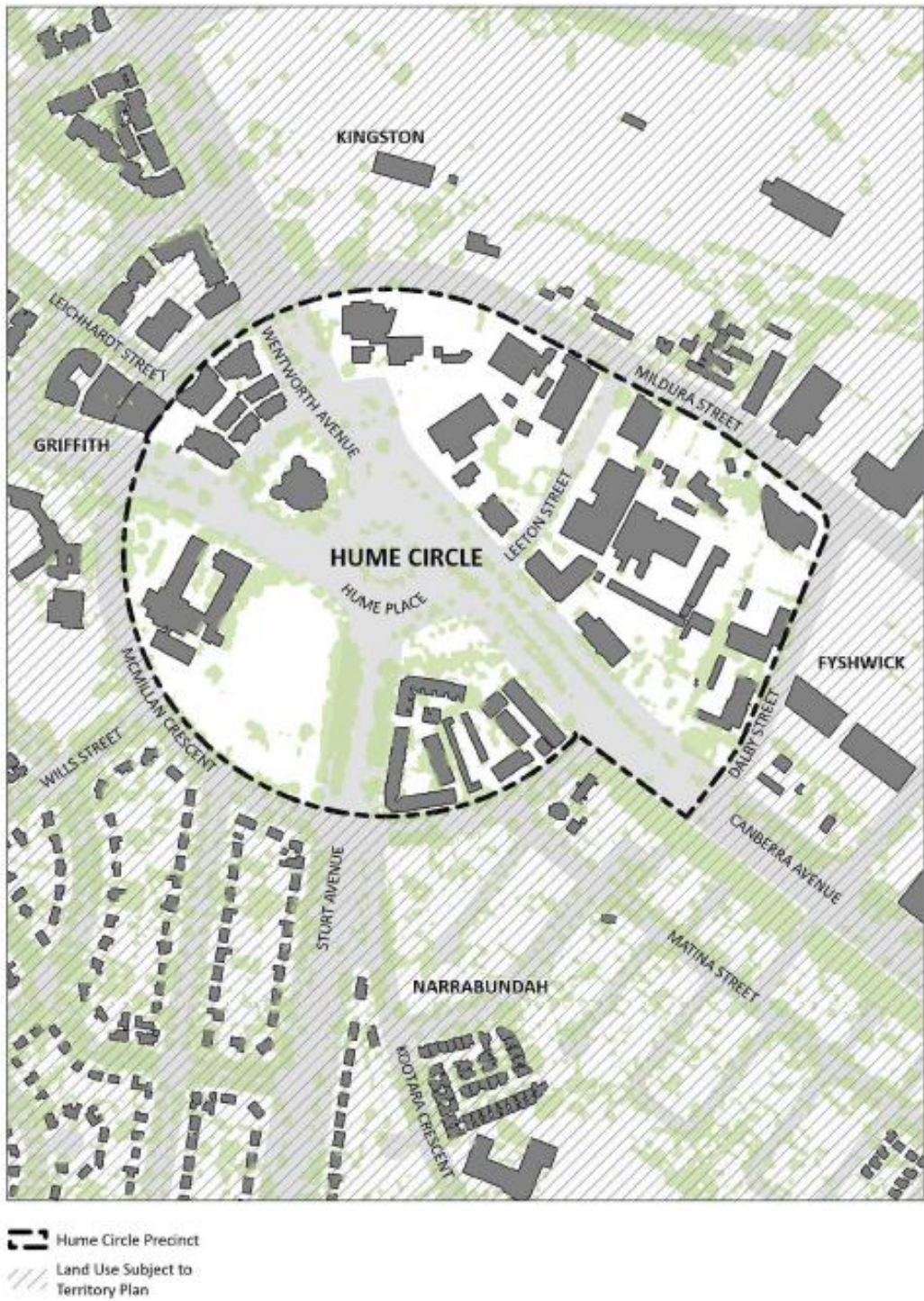


Figure 145: Hume Circle Precinct location

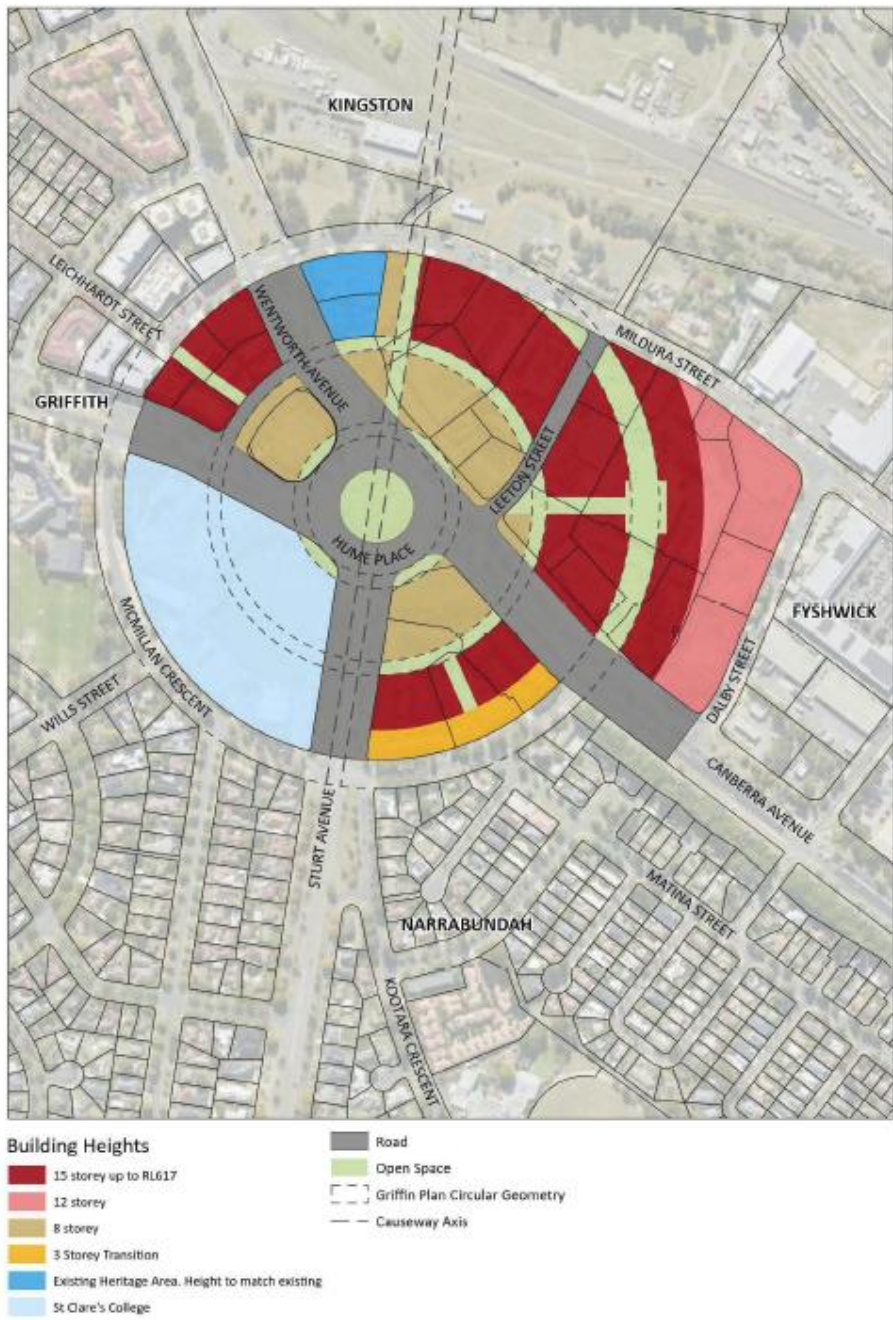


Figure 147: Hume Circle Precinct - Building height framework



Figure 146: Land use for the Hume Circle Precinct

Questions and Answers extracted from NCA information provided:

## What changes are proposed by DA102?

DA102:

- defines the area proposed to be the Hume Circle Precinct
- establishes the proposed Hume Circle Precinct as a Designated Area, reflecting it as an area of national significance
- outlines objectives for the Hume Circle Precinct and defines land uses in the precinct
- requires that prior to any development proposals in the proposed precinct Detailed Conditions of Planning Design and Development must be provided for approval of the NCA including public consultation.

## Why is this change proposed?

Draft Amendment 102 has been proposed in response to Australia's National Urban Policy and to reflect the significance of this precinct.

The policy, which was finalised in November 2024, was jointly developed by the Commonwealth, State and Territory Governments. The policy provides a national vision for Australia's cities and suburbs to be liveable, equitable, productive, and sustainable. In particular the policy calls for National Cabinet also agreed to a National Planning Reform Blueprint with planning, zoning, land release and other measures to improve housing supply and affordability. The Blueprint encourages medium and high-density housing in well-located areas close to existing public transport connections, amenities, and employment.

Hume Circle was proposed as a place of urban density by the Walter and Marion Mahoney Griffin in their original design for Canberra. However, the Griffin vision for Hume Circle has not been realised, with land largely developed for low scale industrial uses. As these existing facilities age and become unsuitable for contemporary use, there is an opportunity to reimagine Hume Circle and land adjacent, in a manner that is consistent with contemporary planning policy and the original vision for Canberra.

## What does this mean if you are a lessee in the proposed precinct? What changes will it mean?



The changes to the Plan will enable lessees to develop their land for a range of purposes not currently permitted by the Territory Plan.

The proposed changes do not require lessees to change their day-to-day activities, but provides a framework to enable them to develop in the future.

## What is the zoning change and changes to permitted land use?



The land within the proposed Hume Circle Precinct is currently zoned under the ACT Government's Territory Plan. Zonings include CZ2 - Business Zone, IZ2 - Industrial Mixed Use, and CFZ - Community Facilities.

The National Capital Plan uses different land use zonings and policies. DA102 proposes a mixed-use zone permitting residential, community and recreation facilities, retail and commercial uses, and more. The full list of proposed permitted uses is set out in DA102.

## Will the Hume Circle roundabout remain?



DA102 does not propose any specific changes to the Hume Circle roundabout but would enable change to be considered as part of future development proposals.

The ACT Government is currently responsible for the roads (including Hume Place encircling the roundabout) within the precinct and will remain so, should DA102 be approved. The ACT Government may propose changes to the intersection in the future.

# **Submission on National Capital Plan Draft Amendment 102 - Hume Circle Precinct**

## **1. Interest in the Proposal**

I am a current owner-occupier of Staffordshire Terrace, and am therefore directly affected by Draft Amendment 102 to the National Capital Plan.

I appreciate the opportunity to provide feedback on the proposal, and I acknowledge the National Capital Authority's (NCA) role in balancing renewal, housing supply, and the protection of Canberra's national and local character.

My comments are offered in a constructive spirit and reflect a position that is broadly supportive of the outcomes sought by the amendment, while also identifying areas of concern that I believe warrant careful consideration as the amendment progresses.

## **2. General Support for Urban Renewal and Housing Supply**

I support the overall intent of Draft Amendment 102 to enable renewal of an ageing residential precinct and to contribute to increased housing supply in a well-located inner area of Canberra.

From my perspective as a younger resident, I see value in the proposal to rezone industrial-use sites to mixed use. This change would help introduce more everyday activity, services, and local employment opportunities into the area, supporting a more active and liveable neighbourhood. Greater mixed use can mean local shops, cafés, and work opportunities within walking distance, which is important for young people and helps build local economic vitality.

I also acknowledge that not all existing buildings can reasonably be preserved indefinitely, and that planning frameworks must allow for change over time in response to demographic, economic, and environmental pressures.

My support is not unconditional. I believe traffic safety around the roundabout, building scale, and genuine ongoing consultation must be treated as core requirements as planning progresses. However, I do believe the amendment itself is a reasonable and necessary step toward renewal and increased housing supply.

## **3. Recognition of Community Concerns**

I am aware that a number of long-term residents in the precinct hold strong concerns about the proposed changes, including potential impacts on neighbourhood character, and the loss of existing community.

These feelings have been exacerbated by the lack of proactive community engagement by the NCA and ACT Government in relation to this draft amendment. For example, previous

amendments to the National Capital Plan, such as DA99<sup>1</sup>, included referrals to several local forums to ensure community awareness and engagement. Anecdotally, I also understand that consultation on the Eastlake Pace Plan was conducted by face-to-face engagement with impacted residents, and direct notifications at key points. Any engagement to DA102 has been purely reactive, in response to outcry from residents.

Comparatively, the residents of Staffordshire Terrace found out about this amendment by an email from our building corporation on 22 January - less than two weeks before the end of the original submission date.

To maintain community trust and support for the amendment, meaningful consultation and transparent, proactive communication is essential. Implementing these measures will help balance the precinct's renewal objectives with the wellbeing of existing residents.

#### **4. Key Concerns and Matters for Further Consideration**

Notwithstanding my general support, I have concerns that I believe should be addressed as the amendment progresses.

- Traffic Safety and Pedestrian Risk

I am particularly concerned about traffic safety in the Hume Circle precinct. The roundabout within Hume Circle already ranks as the second-highest crash site in the ACT, highlighting existing risks for vehicles and pedestrians.<sup>2</sup>

This is compounded by the proximity of a local school, where last year a student was struck in a hit-and-run incident outside the school grounds.<sup>3</sup>

With the proposed increase in density resulting from new residential and mixed-use buildings, traffic volumes and pedestrian exposure will increase, potentially exacerbating safety issues. Any redevelopment planning should explicitly address the management of the roundabout and surrounding streets to prioritise traffic safety, pedestrian access, and safe school routes.

- Building Scale

While redevelopment provides an opportunity to modernise the precinct, it is important that building height, bulk, and massing respect the existing neighbourhood context. Oversized buildings could dominate streetscapes, reduce sunlight access, and alter the character of the precinct. Clear design guidelines are essential to ensure that new buildings integrate sensitively with the broader urban setting.

- Infrastructure and Services

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<sup>1</sup> [National Capital Plan Amendment 99 - Consultation Report](#)

<sup>2</sup> ["High-rise buildings considered at Hume Circle Canberra roundabout," Canberra Times, 2025](#)

<sup>3</sup> ["ACT student hit by car outside school pedestrian overpass." ABC News, 2025](#)

Increased density must be matched by adequate infrastructure and services, including parking, public transport, pedestrian and cyclist facilities, green space, and local amenities. Without careful planning, redevelopment could strain existing infrastructure and reduce the quality of life for both current and future residents. Planning should include assessments of infrastructure capacity and strategies to manage demand effectively.

- Certainty and Transparency

Residents would benefit from clear and timely information regarding the likely scale, staging, and timing of redevelopment. Transparency around planning approvals, development envelopes, and infrastructure upgrades will help reduce uncertainty and speculation, allowing residents to make informed decisions and better prepare for changes in the precinct. The NCA and ACT Government should ensure that communication is consistent, accessible, and ongoing throughout the planning and redevelopment phases.



**FYSHWICK**  
BUSINESS  
ASSOCIATION

---

ABN 57 948 429 670

16 February 2026

The Chief Planner  
National Capital Authority  
GPO Box 373 Canberra ACT 2601

By email: [draft.amendment@nca.gov.au](mailto:draft.amendment@nca.gov.au)

Dear Chief Planner,

**Re: Submission in Support of Draft Amendment 102 – Hume Circle Precinct**

The Fyshwick Business Association (FBA), as the representative voice for over 1,500 businesses and 16,000 workers in Canberra’s premier industrial and commercial precinct, welcomes the opportunity to provide this submission regarding Draft Amendment 102 (DA102).

Having previously expressed significant concerns regarding the ACT Government’s draft East Lake Place Plan, the FBA strongly supports the National Capital Authority’s leadership in proposing this amendment, which aligns closely with our long-term “Eastwick Greenline” vision for urban renewal and connectivity (see Appendix A attached).

Our support is based on the following key pillars drawn from our strategic planning documents:

**1. Realising the Griffin Legacy and Urban Geometry**

The FBA has previously criticised planning attempts that effectively missed the last opportunity to deliver fully on the Burley Griffin legacy. We have specifically advocated for completing the ring roads of Hume Circle and extending The Causeway road through to Hume Circle.

We applaud the NCA’s proposal to complete the circular geometry by extending McMillan Crescent and reinstating the radial streets contemplated in the 1918 Griffin

Plan. This restores the intended scenic approach route and creates a major gateway to the Parliamentary Zone that has been neglected for decades.

## **2. Alignment with Urban Intensification and Housing Supply**

The FBA recognises the critical need to accommodate 100,000 more Canberrans and believes Fyshwick and its interfaces can play an important role in doing some of the ‘heavy lifting’ in terms of housing density.

We have long argued that the Mildura Street precinct (Section 6 and Section 26, Fyshwick) is already transitioning away from traditional industry and should be formally recognised as a mixed-use precinct.

The proposed “Land Use A” category, which permits residential, retail, café and social housing, finally provides the legal framework needed to deliver the urban density and land value uplift for which the FBA has advocated. The building height framework (allowing up to 12 and 15 storeys) is a bold and necessary step toward achieving genuine urban intensification in an appropriate location.

## **3. Integration with the "Eastwick Greenline" Vision**

The FBA’s Eastwick Greenline concept proposes transforming the existing heavy rail corridor into a focus for daily life through compact, connected and people-focused neighbourhoods.

DA102’s focus on pedestrian-prioritised boulevards and integrated greenspace networks mirrors our vision for a “car-free avenue” and an active transport “highway”.

By establishing Hume Circle as a high-quality urban node, the NCA supports our goal of linking major destinations like Canberra Outlet Centre, Dairy Road, Fyshwick Markets and the Kingston Foreshore via a high-performance transport network.

## **4. Leaseholder and Stakeholder Readiness**

A primary grievance we held with previous planning processes around this area was the lack of engagement with current leaseholders, (including those leaseholders who had already advanced concept plans for their leaseholds).

The FBA notes that a Section 6 Owners’ Group has already collaborated on concept drawings to complete the Hume Circle ring roads. The NCA’s amendment provides the necessary regulatory certainty for relevant stakeholders to invest with confidence in the West Fyshwick precinct’s revitalisation.

## **5. Addressing the Traffic and Productivity Crisis**

Fyshwick currently suffers from a traffic congestion crisis that is driving productivity down and forcing industrial businesses to vacate the precinct.

DA102’s plan to open up the precinct via the McMillan Crescent extension and the creation of new radial links will help relieve the pressure on choked intersections like Newcastle and Ipswich Streets. This is essential for preserving Fyshwick’s status as a functional employment hub.

## **Conclusion**

Draft Amendment 102 represents a once-in-a-generation opportunity to rectify previous planning anomalies and deliver a gateway befitting the National Capital. It moves the area away from the piecemeal land release we have previously condemned and toward a comprehensive, design-led framework that respects history, addresses future housing needs, and assists with maintaining functional and productive capacity for commercial enterprise in the area.

The Fyshwick Business Association welcomes the opportunity to work with the NCA to ensure the detailed conditions of planning and design reflect the practical needs of our leaseholders and business community, whilst remaining in harmony with the aspirations of future residents.

Yours sincerely,

Ben Hastings

President

Fyshwick Business Association Inc.

# Light Rail + Greenline Concept

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**Date**

November 2021

**Prepared For**

Fyshwick Business Association

**Prepared By**

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<u>REVISION</u>	<u>ISSUE</u>	<u>DATE</u>
A	WIP	03.06.21
B	Revised Draft	03.09.21
C	Revised Draft	11.11.21
D	Final Draft	16.11.21



## **CONTENTS**

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**2.0 Background + Brief**

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**7.0 Summary of Key Benefits**

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# 1 Introduction

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FYSHWICK RAIL CORRIDOR - TODAY



The existing railway corridor in Fyshwick becomes a focus for daily life, framed by development which addresses and activates the public realm.



KINGSTON RAILWAY STATION - TODAY



The 'Greenline' is a legacy project which proposes to transform East Canberra into compact, connected and people focused neighbourhoods.



## 2 Background + Brief

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## 2.1 CANBERRA LIGHT RAIL - CURRENT PLAN

### CANBERRA LIGHT RAIL STATUS

Transport Canberra – Light Rail Network is a recent sustainable transport initiative being implemented in a staged approach in Canberra and is envisaged to develop over 25 years. To date, Stage 1 of the Light Rail Network has been implemented from Gungahlin to the City serving the North of Canberra. Stage 2, from the City to Woden, is currently in design.

The below is taken from Transport Canberra Light Rail Network document and indicates the Draft Light Rail Corridor connections.

### EASTERN CONNECTIONS (FYSHWICK AND AIRPORT)

The Eastern Connection (Fyshwick and Airport) are identified as High Priority Corridor.

The eastern network provides a public transport connections in two branches:

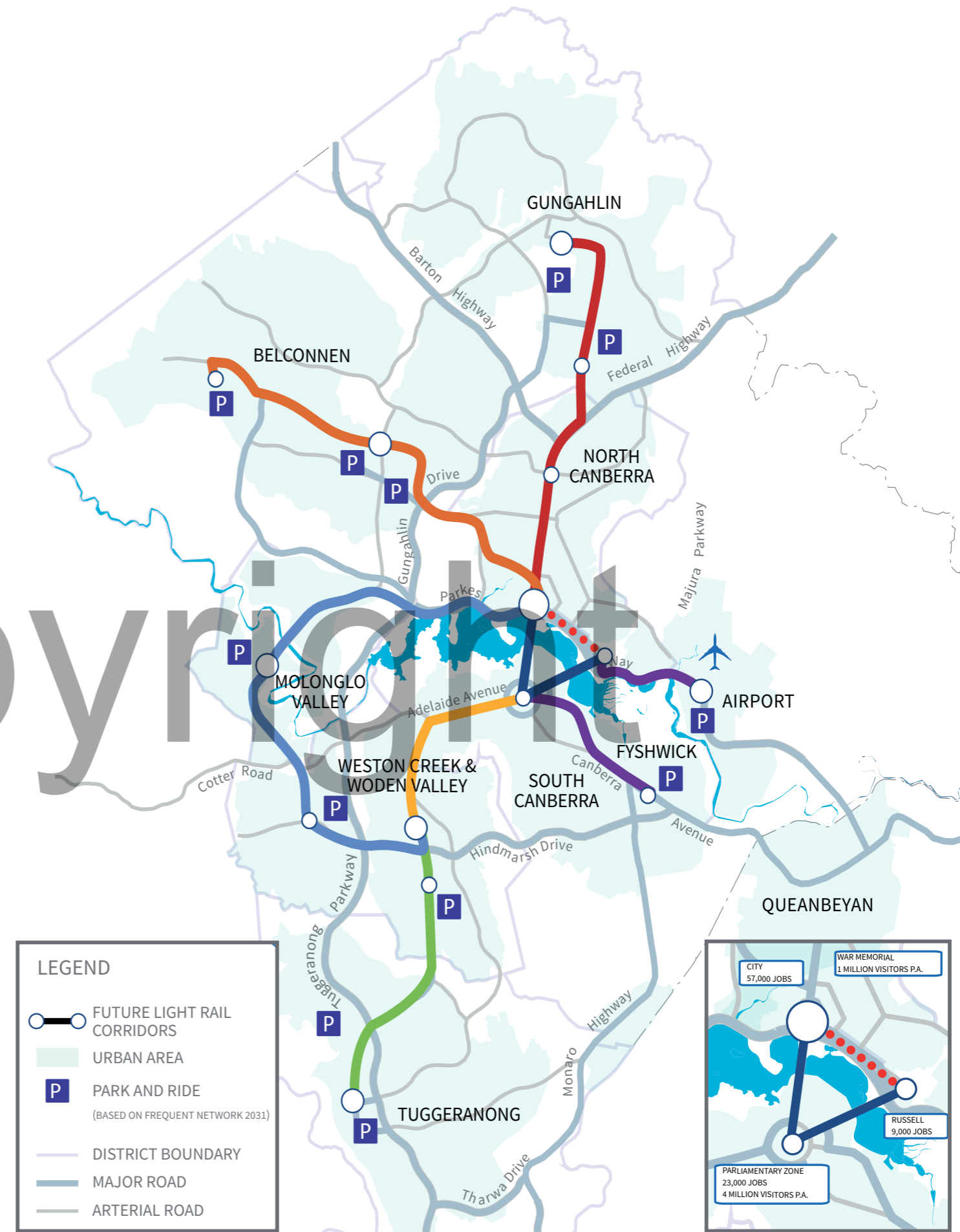
1. City, Russell and the Airport
2. Parliamentary Triangle, Kingston and Fyshwick.

Why its needed:

- Capitalises on our key economic flows between City, Russell, Barton, Fyshwick and Majura
- Queanbeyan is growing and could be served with park and ride facilities
- 65% of airline arrivals in Canberra are destined for the Parliamentary Triangle
- Supports growth in tourism and future direct international flights from Canberra Airport
- Infrastructure Australia data says these corridors are under pressure
- Supports compact growth and transit oriented development in our eastern residential and commercial areas – Kingston, Eastlake, Fyshwick and Eastern Broad-acre
- Investment leads urban renewal and development along the corridors at key transit nodes
- Can be coupled with an active transport corridor to promote health and wellbeing and reduce fossil fuel dependency.

There are implementation challenges that are discussed in this report. A key being the potential crossing of the lake in the location proposed.

Image: Light Rail Corridors Draft Network - Page 11.  
[https://www.transport.act.gov.au/\\_data/assets/pdf\\_](https://www.transport.act.gov.au/_data/assets/pdf_)



## 2.2 EASTERN CONNECTIONS - CURRENT PLAN

### CURRENT INDICATIVE LIGHT RAIL EASTERN CONNECTIONS

This image describes the two potential branches of the Canberra Light Rail Network to the Airport and to Fyshwick.

#### Strengths

- The Fyshwick route will link Barton and the City to the already established high-density residential areas of Kingston and the Foreshore via the Wentworth Avenue alignment.
- The Fyshwick route will link Fyshwick to the wider Light Rail network at Canberra Avenue, reducing the need for private vehicle traffic within Fyshwick and encouraging “park and ride” service from Queanbeyan/Tuggeranong into the major employment areas on the network.
- The Canberra Airport connection will link major employment and education hubs at Reid, Campbell and Russell to the wider light rail network.
- The Canberra Airport connection will link the airport to the wider network, enhancing the performance and usability of both to encourage modal shift away from private vehicle use when flying into/out of Canberra.
- Canberra Avenue is a major private vehicle-based commuter link from Tuggeranong and Queanbeyan towards Barton, the Parliamentary Triangle, Russell, and the City. A light rail line using Canberra Avenue would considerably reduce the reliance on private vehicles for access from the south and eastern suburbs to the city and further north by encouraging park and ride from the Fyshwick terminus.
- Established commercial/industrial and low-density residential areas around Canberra Avenue would benefit both residents and local business operators in the area through their connection to the wider network.

#### Weaknesses

- Significant physical works along the entire route would affect vehicle traffic during construction and reduce traffic volume along the corridor both during and after construction.
- There would be considerable cost to the Territory in locating a rail line along Canberra Avenue, due to grading (roads can accommodate steeper changes in altitude), intersection upgrades and service realignment.
- The residential areas adjacent Canberra Avenue or within 1km, will be fully developed prior to the route being constructed. A significant portion of low-density residential land zoned RZ1 is within 1km of the Canberra Avenue alignment. Limitations in existing planning controls prevent substantial redevelopment of low-density areas of Narrabundah and Griffith, limiting wider economic growth

the new route could create.

- There would be no connection between the proposed two eastern linkages, with both ending at their respective terminus locations. This would reduce usability of the wider network through increased congestion by requiring connections be made in the City. This would also require greater frequency of service or longer trains to match the increased demand the changeover in the city will have on these routes. Further, it will increase travel times for journeys from/to the residential areas on the Fyshwick route from/to the employment/service areas on the Airport route, decreasing the likelihood of modal shift from cars to public transport.

Image: Light Rail Corridors Draft Network - Page 29.  
[https://www.transport.act.gov.au/\\_\\_data/assets/pdf\\_file/0016/1229011/Transport-Canberra-Light-Rail-Network.pdf](https://www.transport.act.gov.au/__data/assets/pdf_file/0016/1229011/Transport-Canberra-Light-Rail-Network.pdf)



## 2.3 ALTERNATIVE ROUTE - EASTERN CANBERRA LOOP

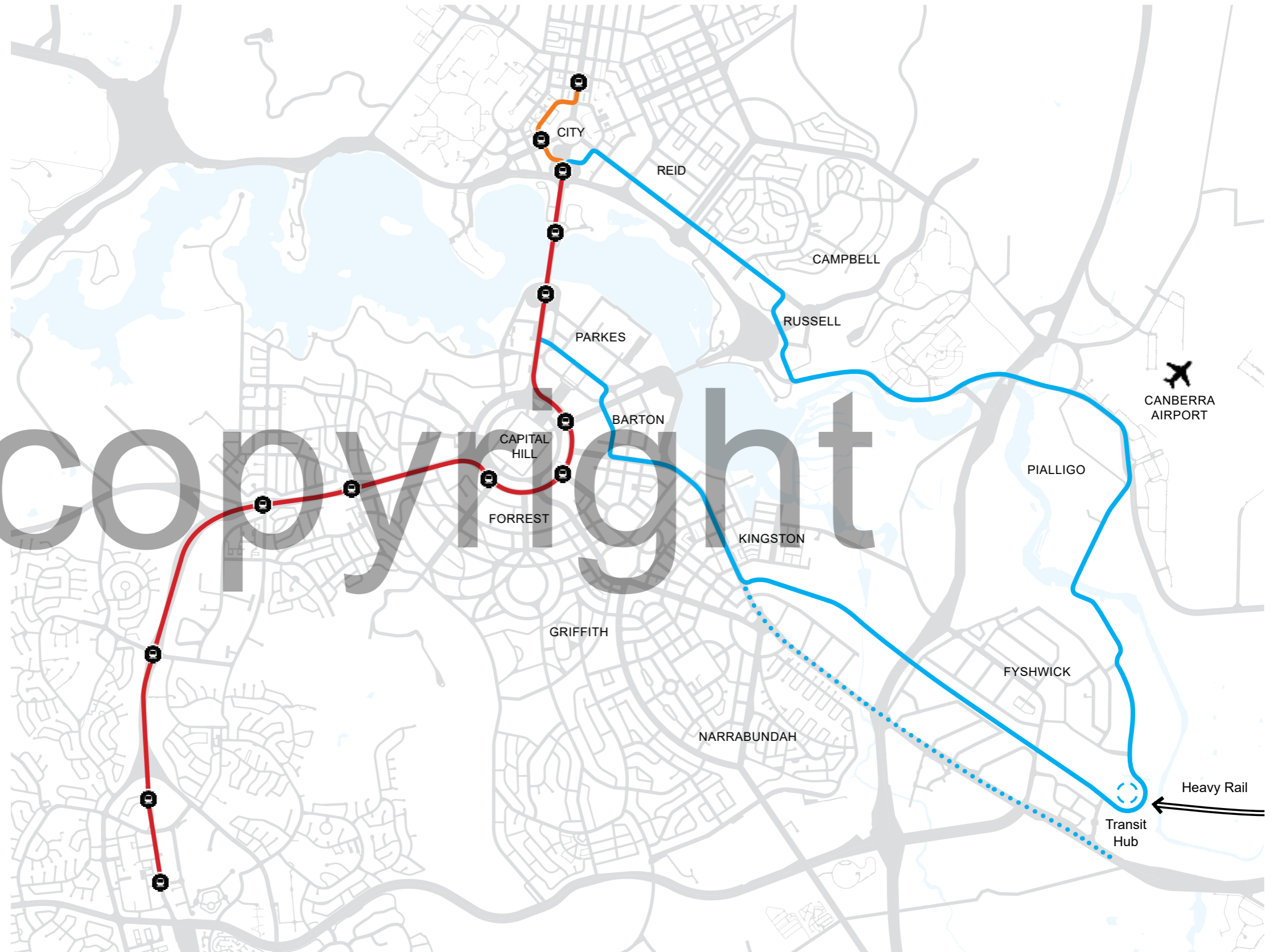
### ALTERNATIVE ROUTE PROPOSAL

The Fyshwick Business Association (FBA) has initiated a discussion around a potential alternative light rail route which links the two branches of the Eastern Network in a closed loop.

The proposal utilises the existing heavy rail corridor through Fyshwick and via the existing Kingston Station alignment bypassing Canberra Avenue.

This strategic move will achieve the following key benefits:

- Activate and generate uplift through key development zones promoting transit oriented development
- Service areas with the potential for high density zoning as opposed to long established low scale neighbourhoods like Griffith and Narrabundah
- Provide affordable housing capacity in the new development zones
- Offer considerable cost savings by leaving Canberra Avenue in tact through Fyshwick whilst also removing construction disruption to the Canberra Avenue corridor
- Create a new transit hub at the edge of Fyshwic, close to the airport where heavy and light rail can converge. Park and ride facilities can offer more than one route into Canberra
- Link the airport to the Parliamentary Triangle and dense inner east without passing through the city
- Encourage airport users to travel to the airport via public transport
- Links Fyshwick with the broader transport network reducing private vehicle use within Fyshwick
- Enhance the potential of Eastlake as a well served ecological destination
- Link new development zones and key public assets and destinations including Kingston, The Causeway, Eastlake, Dairy Road and the Fyshwick Markets.
- Provide better public access to the lake and wetlands



### LEGEND

- Stage 2A
- Stage 2B
- ..... Current indicative light rail route
- Proposed relocated light rail route
- Heavy rail line terminating at Transit Hub



Scale 1:40,000 @ A3

## 2.4 THE ALTERNATE ROUTE

This document has been prepared by Stewart Architecture on behalf of the Fyshwick Business Association (FBA). The study explores the opportunity for a light rail route along the existing heavy rail line. The study is intended as a vision document and is not a complete master plan.

The eastern foreshore of Lake Burley Griffin is currently undergoing significant change with the ongoing development of Kingston Foreshore, planned urban renewal of the former Causeway with a new East Lake precinct and Dairy Road precinct currently going through its own process of renewal as a new destination for work and play.

The Eastern Corridor light rail line to Fyshwick is already planned as part of Canberra's light rail network and is regarded a high priority stage.

**Building this new line within the existing heavy rail corridor has the potential to reduce the cost of the construction whilst unlocking a series of development sites through the eastern lake area.**

Key to the vision is the benefit of linking up Canberra's disparate public transport systems so that the heavy rail, light rail, airport and active transport networks are connected and promote use.

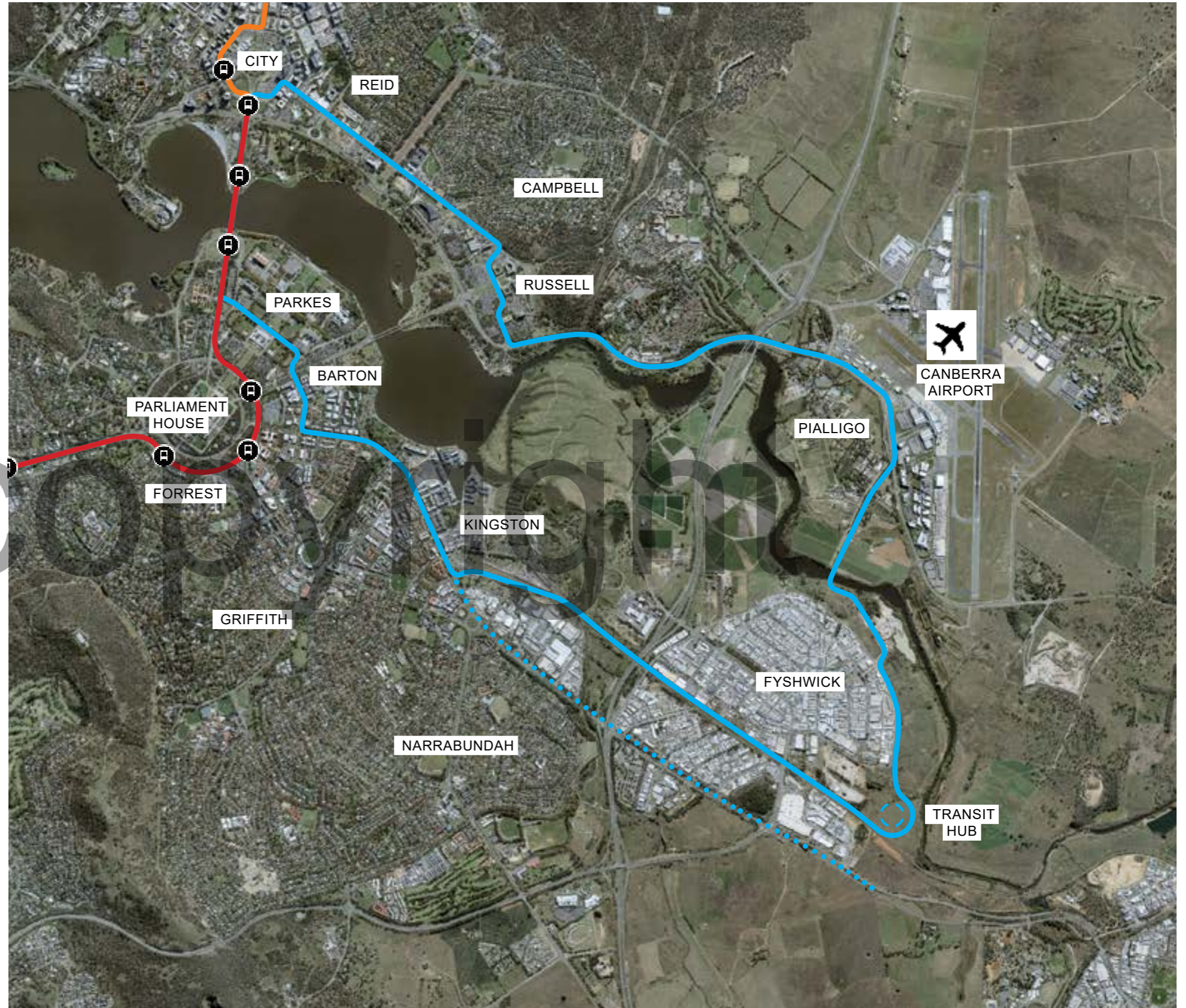
The ability to loop the eastern network back to the city improves accessibility, gives people choice, removes the need to cross the lake at Kings Avenue (which has been explored) and provides an alternative route that takes congestion away from the city for those travelling to the Parliamentary Triangle from the airport (which constitutes 65% of trips by airport arrivals).

### Project Brief / Scope of Work

- Alternative light rail route through Fyshwick
- Relocate heavy rail station from Kingston to east end of Fyshwick
- Common terminus for light rail/heavy rail and interstate buses (to replace Jolimont Centre)
- Run light rail up the former heavy rail corridor, loop around to airport, back to Canberra City
- New opportunities for Hume Circle/East Lake and other key public spaces
- Unlock land development sites along the entire Fyshwick corridor

This document is supported by a separate Planning Study by Purdon Planning.

Image source: ACTmapi. 1:40,000 @A3



# 3 Context + Site Analysis

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## 3.1 CONTEXT + SITE ANALYSIS

### STUDY AREA

#### Fyshwick

Fyshwick is one of Canberra's key industrial areas and works hard to serve Canberra and the region. The area is home to retail, commercial businesses and light industry with pockets of creative uses. Fishwick is the third most populous employment area in Canberra after the city and Belconnen with over 1,000 businesses and 15,500 workers.

It was named after Sir Philip Fysh, a Tasmanian politician who assisted in bringing about Australia's Federation. The suffix "wick", from Old English, means "dwelling place" – and, by extension, "village" or "district". Its streets are named after Australia's industrial towns and regions.

#### Jerrabomberra Wetlands

Jerrabomberra Wetlands Nature Reserve is one of the most valuable wetland habitat areas in the ACT, and of national and international importance. A refuge for migrating birds from the northern hemisphere and inland Australia, Jerrabomberra Wetlands Nature Reserve is part of Canberra Nature Park. It is also an important passive recreation area and a vital visual and physical link to the surrounding landscape..

#### Kingston Foreshore

Kingston also contains the main Canberra heavy rail terminal on Wentworth Avenue and the future light rail is proposed to run along Wentworth Avenue with a stop at the rail terminal to provide public transport connection to the city and Civic in the future.

#### East Lake

East Lake will see the redevelopment of the former Causeway as a natural extension of Kingston Foreshore and includes low lying areas south of the rail line adjacent the Canberra Institute of Technology and the Fishwick Markets. This area contains the creek that feeds into the wetlands from the south of Canberra Avenue.

#### Dairy Road Precinct

1 Dairy Road Fishwick is an industrial site that previously included logistics and distribution warehouses with large surface car parks and loading areas. The site is transforming as a new creative hot spot with almost 20,000m<sup>2</sup> warehouse style precinct, including new boutique brewery, indoor ski slopes, rope free rock climbing centre, coffee roasters and gin distillery as well as redeveloped commercial office spaces. The new precinct is made possible by a Territory Plan Variation and will include future residential.

Image source: ACTmapi



## 3.2 CONTEXT + SITE ANALYSIS CANBERRA RAILWAY STATION

### KINGSTON RAILWAY STATION STATUS

Canberra's only major heavy rail terminus has long been considered inadequate for the nation's capital with interstate passengers arriving in Kingston some 4.6km from the CBD. Arrival at the station is made more difficult by the lack of public transport connections with local bus service only.

**'The line to Canberra ends at a second-rate facility that is inferior to some that grace country towns, let alone befitting the nation's capital.'**

**The fact that Canberra is still not a major stop between Sydney and Melbourne is a travesty, part of Australia's seeming inability to see the infrastructure big picture and its predilection for road transport.'**

Ian Bushnell, Riot Act 24 September 2021

Source: <https://the-riotact.com/canberra-railway-station-is-literally-at-the-end-of-the-line/497900>

### LOCATION HISTORY

The Kingston railway terminus was never the planned location for Canberra's heavy rail station.

*"In Griffin's plan, we would have a number of stations, including one here in Civic, which would be right in the middle of the Canberra Centre ... that was going to be Civic station."*

*"The actual railway itself was intended to go much closer to Mount Ainslie ... with a big station under his big market building, which is pretty much where the Australian-American memorial is now."*

Mark Bute, ACT Railway Historical Society

Source: <https://www.abc.net.au/news/specials/curious-canberra/2017-07-24/why-does-the-sydney-canberra-train-stop-in-kingston-not-civic/8714866>

### RE-THINKING THE STATION SITE

The opportunity to relocate the station to the edge of Fyshwick will provide opportunities for more significant local and interstate connections. A multi-modal hub with the architectural significance befitting a capital city can bring together all modes of transport and has the potential to connect to a Sydney-Melbourne rail route.



### 3.3 CONTEXT + SITE ANALYSIS RELATED CONCEPTS + PLANS



#### 2010 - DRAFT PLANNING OPTIONS FOR EAST LAKE URBAN RENEWAL

The ACT Government first identified opportunities for urban intensification and renewal as part of the 2004 *Canberra Spatial Plan* and includes Kingston Foreshore, Jerrabomberra Wetlands and Fyshwick and the Canberra Railway Station. Since then a range of preliminary planning investigations have been undertaken by the Environment Planning and Sustainable Development Directorate (EPSDD) in consultation with the community and key stakeholders.

Notably the plan includes moving the existing railway [indicated] down the line to a site adjacent 1 Dairy Road and the Monaro Highway.

Source: [https://www.planning.act.gov.au/urban-renewal/other-projects/eastlake\\_urban\\_renewal/options\\_for\\_east\\_lake](https://www.planning.act.gov.au/urban-renewal/other-projects/eastlake_urban_renewal/options_for_east_lake)



#### 2014 - CANBERRA AIRPORT [LIGHT RAIL PLAN]

Canberra Airport 2014 Master Plan proposal was developed as a contribution to the public conversation on Canberra's transport network. From the Master Plan: *'Within the next ten years, nearly 100,000 people are predicted to commute to and from work in the heart of Canberra, and the current 30,000 daily inbound airport visitors will more than double within the next decade.'*

The proposal suggests that the light rail should link the major destinations in Canberra; Canberra's City Centre, the Airport and the Parliamentary Triangle and recognises the population growth planned for the East Lake development.

Source: <https://www.globalairrail.com/news/entry/canberra-airport-calls-for-light-rail-consultation>

## RELATED CONCEPTS + PLANS



### 2016 - JERRABOMBERRA WETLANDS

In 2016, the ACT Government and Jerrabomberra Wetlands Management Committee (Oculus Landscape Architects) produced a Concept Plan setting a strategy and design framework for the future of the Jerrabomberra Wetlands. Proposals in the Concept Plan are aspirational only and subject to further consultation and planning processes. The plan indicates an indicative structure for development in East Lake.

Source: [https://www.planning.act.gov.au/\\_\\_data/assets/pdf\\_file/0006/1614039/190125-Dairy-Road-Integration-Study-Jerrabomberra-Wetlands,-Dairy-Road-East-Lake-Final.pdf](https://www.planning.act.gov.au/__data/assets/pdf_file/0006/1614039/190125-Dairy-Road-Integration-Study-Jerrabomberra-Wetlands,-Dairy-Road-East-Lake-Final.pdf)



### EASTLAKE INVESTIGATION AREA - 2020

The engineering site investigation is also underway for the land between the Jerrabomberra Wetlands and the railway corridor, including the Causeway. This includes Surveying, Tree Assessment, Engineering Services Assessment and Geotechnical studies. We understand further planning is subject to the findings of this work.

Source: April 2020 East Lake Urban Renewal Update Page 3.  
[https://www.planning.act.gov.au/\\_\\_data/assets/pdf\\_file/0007/1512925/East-Lake-April-2020-update-web.pdf](https://www.planning.act.gov.au/__data/assets/pdf_file/0007/1512925/East-Lake-April-2020-update-web.pdf)

## RELATED CONCEPTS + PLANS



### 2018 - DAIRY ROAD LAND SUPPLY ASSESSMENT

The Dairy Road Foreshore precinct is currently enjoying a transformation from an isolated industrial area into a new 'gritty' creative warehouse style precinct. Currently there are no plans to demolish the existing fabric of the warehouse buildings but more for them to be repurposed and reused to accommodate new innovative and creative businesses.

Source: Top image: [https://www.planning.act.gov.au/\\_\\_data/assets/pdf\\_file/0018/1614042/180919-Dairy-Road-Land-Supply-Assessment.pdf](https://www.planning.act.gov.au/__data/assets/pdf_file/0018/1614042/180919-Dairy-Road-Land-Supply-Assessment.pdf) | Bottom left image : Dairy Road Land Supply Assessment 2018 | Bottom right image: <https://capitalbrewing.co/>

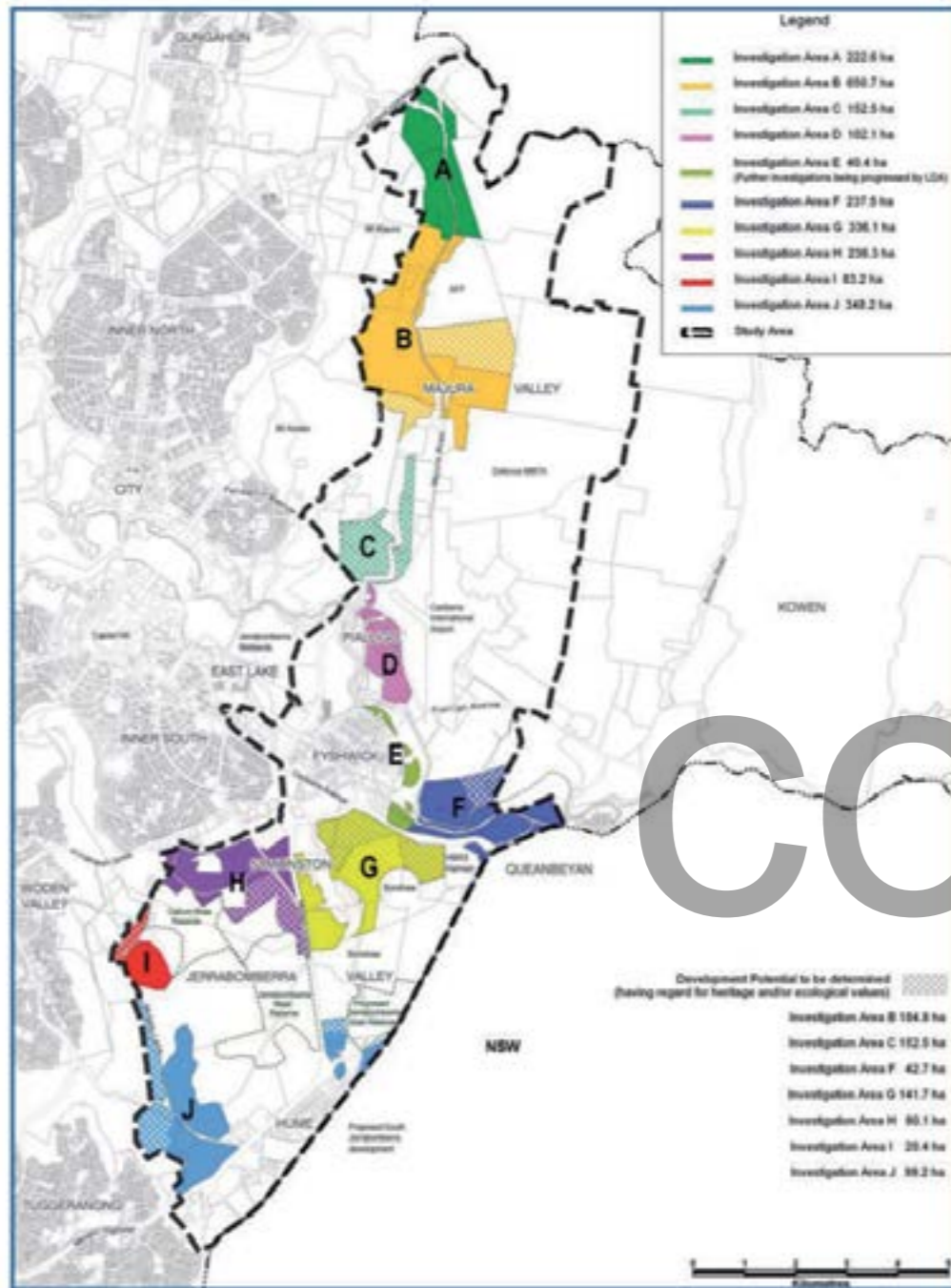


### HIGH VOLTAGE POWER CABLE RELOCATION

The existing Causeway zone substation opposite Norgrove Park is proposed to be decommissioned and replaced with a state of the art GIS substation located on Dairy Road within the sewer treatment plant complex. Work has already been completed on Stage 1 as well as a combination of under boring and open trench for 132kv transmission line that will connect the causeway site along Newcastle Street at the Causeway and then through the Jerrabomberra Wetlands to the new substation site. The line will also connect south towards Canberra Avenue along the western side of the Dairy Road development and along the southern boundary.

Source: [https://www.planning.act.gov.au/\\_\\_data/assets/pdf\\_file/0018/1614042/180919-Dairy-Road-Land-Supply-](https://www.planning.act.gov.au/__data/assets/pdf_file/0018/1614042/180919-Dairy-Road-Land-Supply-)

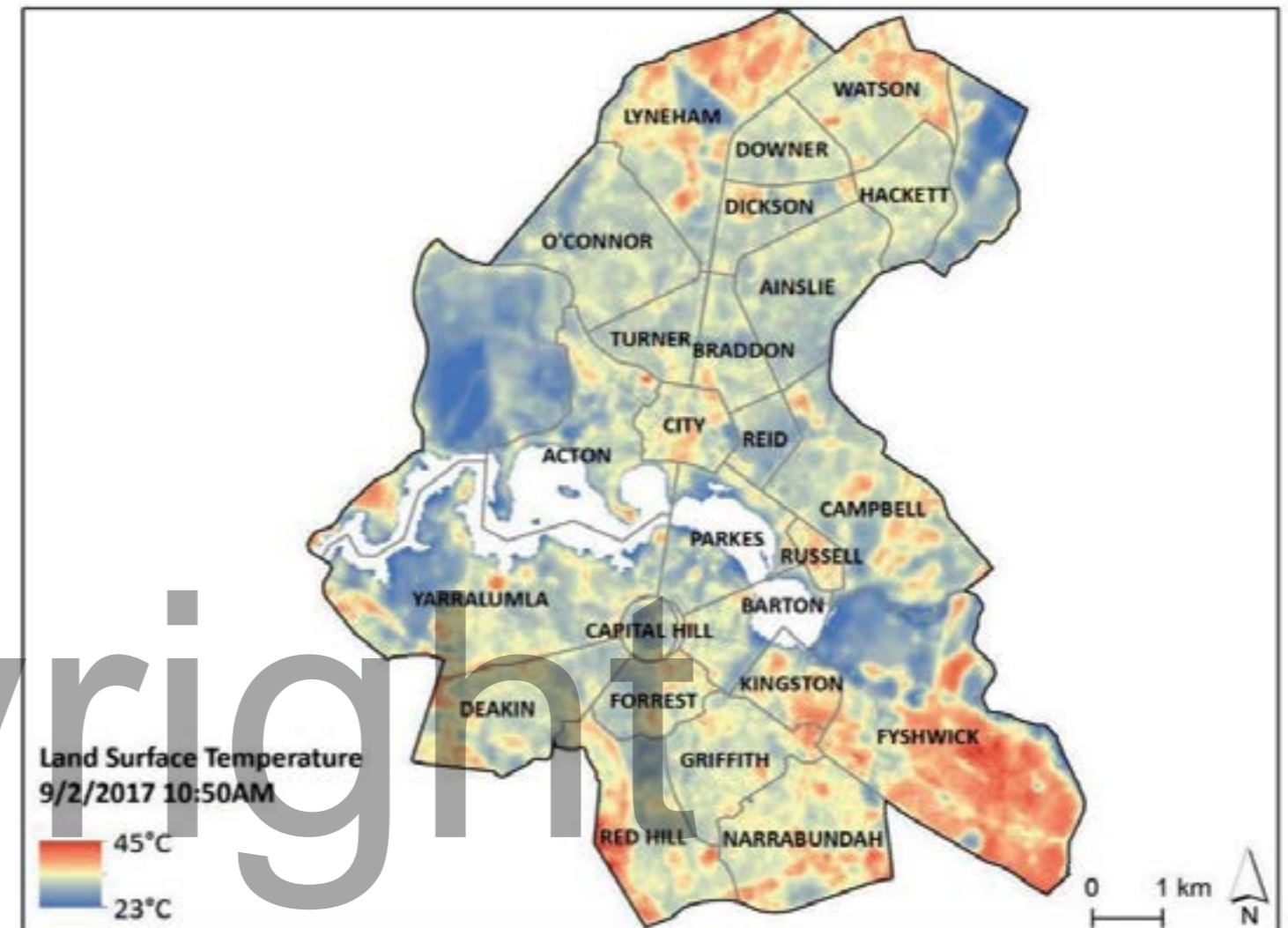
## RELATED CONCEPTS + PLANS



### IDENTIFIED 2014 - EASTERN BROADACRE

The ACT Government has identified parts of the eastern side of the ACT, known as Eastern Broadacre, as a potential future employment, industrial and related uses corridor. The Eastern Broadacre area extends from the Majura Valley to Hume and includes Symonston and the Jerrabomberra Valley. The ACT Government is progressing plans to facilitate the release of land in Eastern Broadacre for employment generating development. The release of land in these zones will lead to the further expansion of the Canberra landscape, adding to urban sprawl.

Source: [https://www.planning.act.gov.au/\\_\\_data/assets/pdf\\_file/0012/892389/Eastern\\_Broadacre\\_Fact\\_Sheet\\_web\\_](https://www.planning.act.gov.au/__data/assets/pdf_file/0012/892389/Eastern_Broadacre_Fact_Sheet_web_)



### 2016 - MAPPING SURFACE URBAN HEAT IN CANBERRA [CSIRO]

This report is aimed at mapping the spatial patterns of urban heat and to a lesser extent cold in Canberra and to identify the neighbourhoods where high heat exposure coincides with high population vulnerability, building the evidence base for informed climate adaptation action. The report identifies areas of concern and ways to mitigate heat island with various cooling strategies. Fyshwick proper is identified as a critical area of heat in urban Canberra.

Source: [https://www.environment.act.gov.au/\\_\\_data/assets/pdf\\_file/0005/1170968/CSIRO-Mapping-Surface-Urban-Heat-In-Canberra.pdf](https://www.environment.act.gov.au/__data/assets/pdf_file/0005/1170968/CSIRO-Mapping-Surface-Urban-Heat-In-Canberra.pdf)

# 4 Planning + Strategic Context

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# PLANNING + STRATEGIC FRAMEWORK

## 4.1 STATUTORY PLANNING CONTEXT

### 1. National Capital Plan

Applies to Canberra Avenue as a 'Main Avenue'

### 2. Statement of Planning Intent

- Higher-density development along major transport corridors and in other locations with good public transport and amenity.
- Locate infill development and affordable housing close to public transport routes and adjacent to parks, open space and other areas of high amenity.
- Encourage mixed-use developments at major centres and along public transport corridors to ensure active, vibrant community spaces and places.
- Review the role and function of precincts to deliver flexible and innovative planning to create liveable and sustainable communities.
- Foster the development of prosperous economic and employment hubs in the city's centres.

### 3. ACT Planning Strategy 2018

Compact and Efficient / Diverse / Sustainable and Resilient / Liveable / Accessible

The ACT Planning Strategy 2018 outlines that 70% of new housing will be built with our existing urban footprint through increased density, around town and group centres and along major transport routes.

### 4. Statement of Strategic Directions

- Deliver housing that is diverse and affordable to support a liveable city
- Encourage high quality design, built form and places for a changing climate
- Use infrastructure efficiently to support our growing community
- Integrate living infrastructure and sustainable design to make Canberra a resilient city within the landscape
- Deliver social infrastructure that meets community needs and supports strong communities
- Deliver well designed, safe and sustainable streets and public spaces to create walkable neighbourhoods that are inclusive and fair
- Create a better experience for walking and cycling into

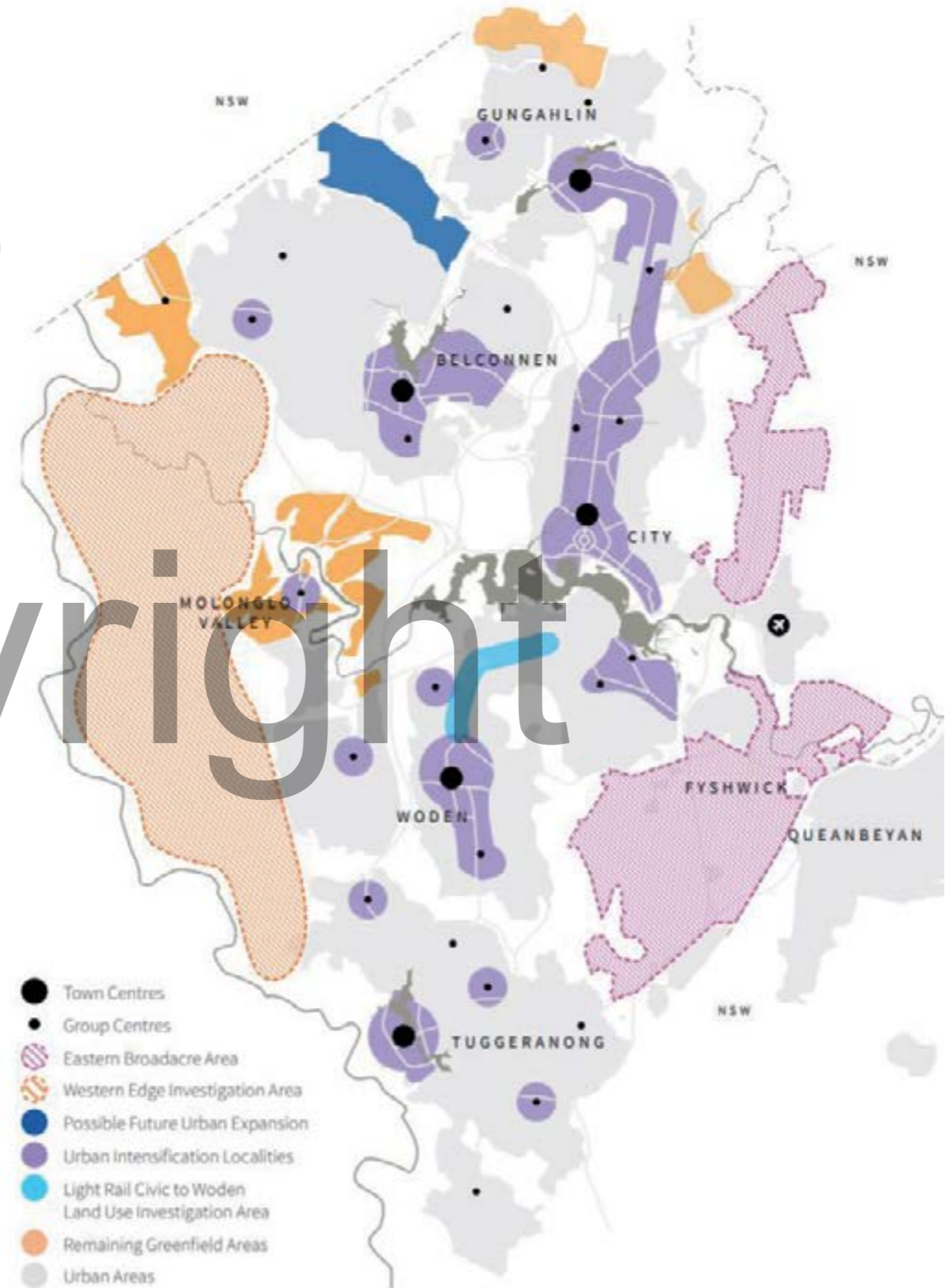
and within the city centre and our town centres

### 5. East Lake Urban Renewal

### 6. Climate Change and Transport Strategies

### 7. ACT Housing Strategy October 2018 goals

- An equitable, diverse and sustainable supply of housing for the community
- Reducing homelessness
- Strengthening social housing assistance
- Increasing affordable rental housing, and
- Increasing affordable home ownership.



# PLANNING + STRATEGIC FRAMEWORK

## 4.2 PUBLIC TRANSPORT NETWORK STATUS

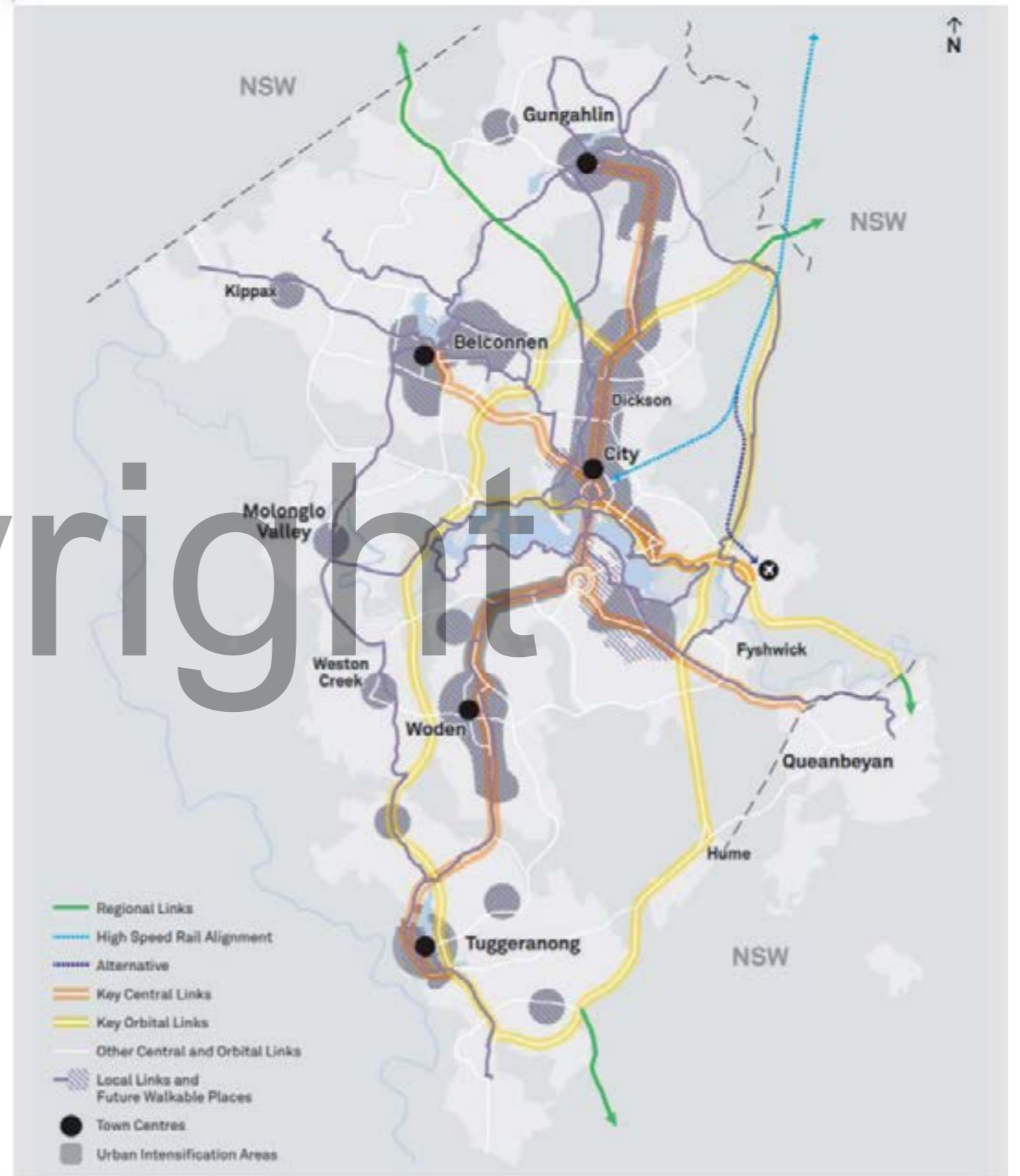
### FUTURE TRANSPORT NETWORK

The future network structure supports and reinforces the ACT Planning Strategy's plan for future land use in Canberra. The following map outlines the conceptual policy framework for Canberra's future transport network to both respond to the place making priorities and shape the city's future urban form.

Image source: ACT Transport Strategy 2020

This plan from the ACT Transport Strategy 2020 clearly illustrates the importance of a transport route to eastern Canberra linking Fyshwick and Queanbeyan. The link is defined as a 'Key Central Link' forming part of the core structure of the city network.

ACT TRANSPORT POLICY PLAN MAP - Conceptual Transport Network 2045



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# PLANNING + STRATEGIC FRAMEWORK

## 4.3 ACT TRANSPORT STRATEGY

### WALKING AND CYCLING FOR A LIVEABLE CITY

Walking and cycling are efficient and active transport modes that can move large numbers of people across dense environments. They also emit zero air pollution, greenhouse gas emissions and noise while improving the vibrancy of places. They are ideal for short local trips and for connecting the last leg of public transport journeys.

**“The ACT Government supports active travel as a key way we will make Canberra a better place to live.”**

– Chief Minister, Andrew Barr

### Walkable places – the City, Town and Group Centres

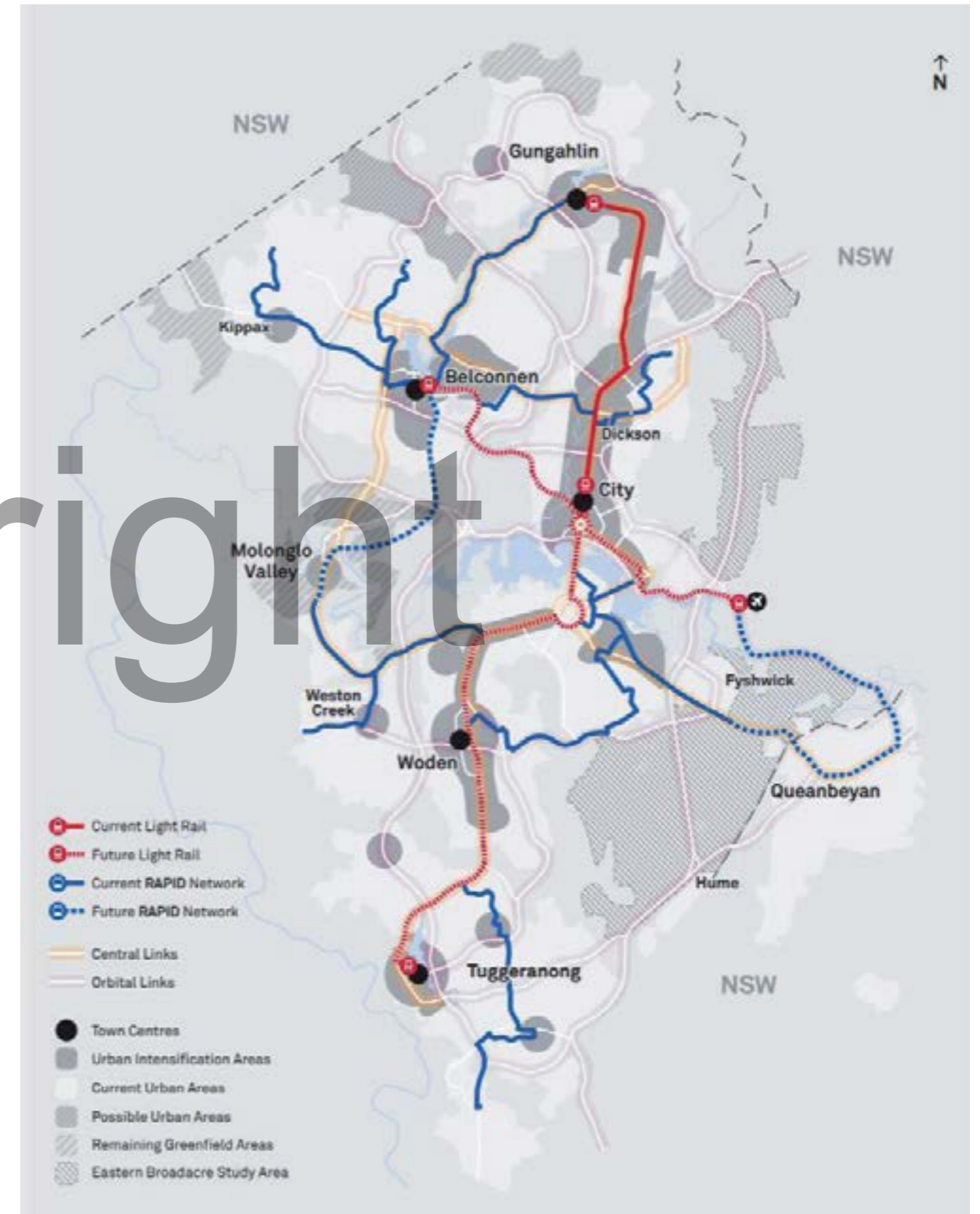
To support liveable neighbourhoods and urban intensification, the future transport network will feature high quality walking environments in the city and urban intensification areas, including town, group and local centres and school zones.

These areas will see:

- high quality footpaths;
- seating to allow rest stops for older people;
- safe opportunities to cross the road; and
- clear walking priority at intersections.

The Government has committed to trial new ways of using roads that most efficiently move people and goods and better support walking, cycling and public transport. This work will also look at best practice road intersection design from around the world to inform trials of new intersection design, in areas supported by the Movement and Place framework, that prioritise walking and cycling. The ACT Government will develop best practice guidance for industry and stakeholders to inform better design outcomes for active travel infrastructure.

ACT TRANSPORT STRATEGY - Central links and public transport network



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# 4.3 PLANNING + STRATEGIC FRAMEWORK ZONING

## THE TERRITORY PLAN

The areas of land around the proposed light rail eastern linkage routes are classified as 'Territory Land' and are therefore subject to the planning controls under the Territory Plan, with development approvals issued by the ACT Planning and Land Authority (ACTPLA). Any development within these areas must not be inconsistent with the objectives of the National Capital Plan.

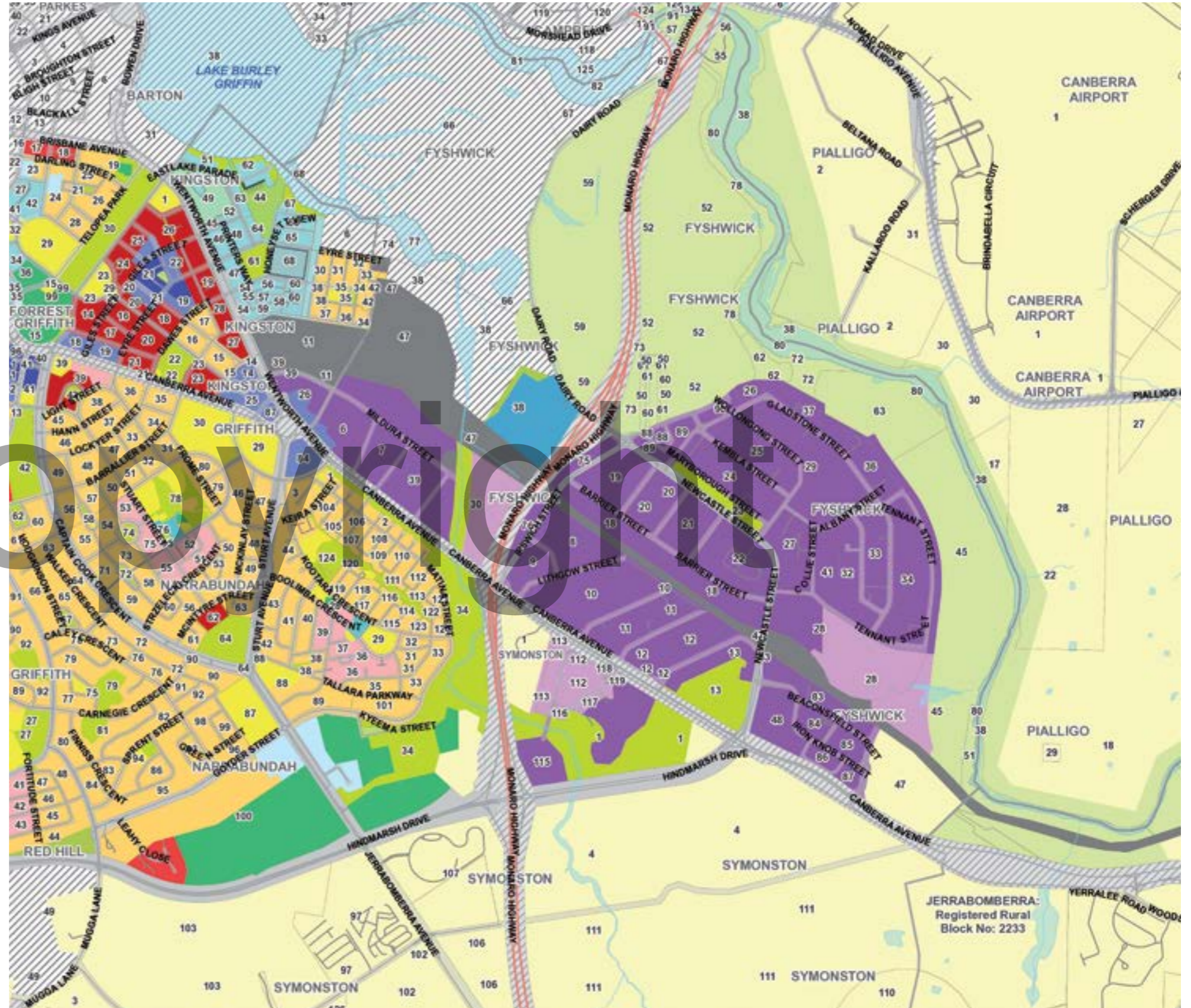
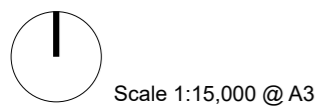
The current proposed eastern connections network runs along Canberra Avenue, which has been identified as a high trafficable area.

## PROPOSED VARIATIONS TO ZONING

A variation to the Territory Plan would be required to rezone land adjacent the proposed FBA route, with parts of 'Area 2' being rezoned to CZ5 - Mixed Use (detailed above) and parts rezoned to CZ3 - Services Zone. The FBA route further north will better serve the new zones but also prevent the need for difficult rezoning of RZ1 land to the south of Canberra Avenue.

It is envisioned that the rezoning of land would be predominantly to remove the TSZ1 zoning to implement the new commercial zones. The only remaining TSZ1 zoned land would be directly under/adjacent the light rail route. Rezoning of some Non-Urban Zoned areas in Area 4 to TSZ1 would also ensure the proposed railway use, is permitted development via merit track assessment.

Source: Purdon Planning document.



## 5 Local + International Precedents

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## PRECEDENT 01 ARBUTUS GREENWAY, VANCOUVER CANADA

“This is really Vancouver’s chance to have a New York-style High Line, a repurposing of what was freight railroad. This is kilometres of public space that’s accessible through our city for all residents to use and connecting many of our neighbourhoods,”

- Vancouver City Mayor, Gregor Robertson 2016

Decades before paved roadways criss-crossed British Columbia’s Lower Mainland, a network of local rail lines was used to transport goods and people across the region. One of those lines was a route that ran from Vancouver in the north to the fishing community of Steveston on the Fraser River in the south. Regular passenger service along the Arbutus Corridor, as it became known, started in 1905 and ran until 1952; freight trains continued to use the line until 2001.

The Corridor had become a community fixture by that point, woven into the fabric of the west side of the city and an integral part of these neighbourhoods. People had been using paths alongside the 9.4-km section of tracks from False Creek to the north arm of the Fraser River as pedestrian and cycling routes for years, and many residents who lived near the tracks had built elaborate community gardens along the line’s right-of-way. Some of these gardens dated back to the 1940s.

The Arbutus Corridor stood abandoned for decades. Neighbours used it as an informal travel route, and didn’t give it much thought until the City of Vancouver acquired the route. They weren’t the only ones thinking about its future, though - a group of passionate designers launched a renegade intervention to promote public discourse about the Arbutus Corridor. They called this campaign OURbutus.

The Arbutus Greenway is one of several walking and biking paths the City of Vancouver is developing to encourage people to use active and sustainable modes of transportation.

The project, which started in 2016, currently has a temporary asphalt path and attracts thousands of people every day, providing people an opportunity to walk, bike, roll from False Creek to the Fraser River. In light of its success, in 2018, City Council endorsed enhancing the path to give people of all ages and abilities places to gather and rest and enjoy the surrounding landscape.

Source: <https://vancouver.ca/streets-transportation/arbutus-greenway.aspx>



## PRECEDENT 02 THE HIGHLINE, NEW YORK CITY

“Cities are fundamentally about people, and where people go and where people meet are at the core of what makes a city work. So even more important than buildings in a city are the public spaces in between them.”

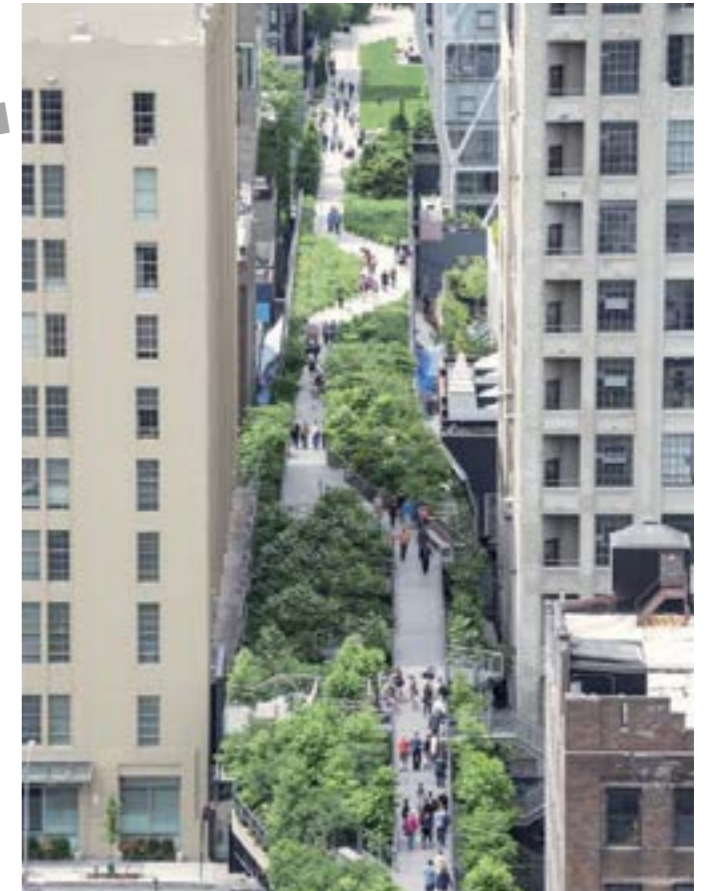
- Amanda Burden, Former director of the New York City Department of Planning, 2014

The High Line was designed strategically to commemorate its history and local framework. This is most apparent in its embodied experience as a linear pathway that meanders throughout the west side of New York City. Littered with different social programs like the 14th Street Passage or Chelsea Thicket, the High Line has a number of spyglass locations that give light to a nostalgic past.

Since its debut in 2009, the ever-trendy High Line has become the new “it” girl of urban architecture, coining the term “the High Line effect.” And with good reason. With its great economic success, global publicity, and its positive contribution to city life, the High Line is a tempting model to replicate, especially when there are eager candidates of outdated and tired infrastructure slated for demolition all across the nation. As a public park built on the historic freight rail line elevated above the streets on Manhattan’s West Side, the High Line has literally made something out of nothing.

Source: <https://publicjournal.online/the-high-line-effect/>

<https://provocations.darkmatterlabs.org/a-smart-commons-528f4e53cec2>



## PRECEDENT 03 PARRAMATTA LIGHT RAIL, SYDNEY

“We’re encouraging people to put their health and wellbeing first and embrace this purpose-built walking and cycling pathway when it opens in 2023,” - Dr Geoff Lee, Member for Parramatta

### OVERVIEW

The Parramatta Light Rail will connect Westmead to Carlingford via the Parramatta CBD and Camellia over 12 kilometres, with 16 stops. It will connect the Parramatta CBD to the Westmead Health Precinct, Bankwest Stadium, the new science, technology and innovation museum Powerhouse Parramatta, the Rosehill Gardens Racecourse and three Western Sydney University campuses at Westmead, Parramatta and Rydalmere. It will also traverse the Cumberland Hospital Precinct, the Camellia Town Centre and the private and social housing redevelopment at Telopea.

### ACTIVE TRANSPORT LINK

Transport for NSW is building a new shared walking and bike riding path for the Greater Parramatta region as part of the Parramatta Light Rail program. Light rail is expected to begin operations in 2023.

Construction of the 5.7-kilometre Active Transport Link (ATL), also known as a walking and bike-riding path, is currently underway. The path will run parallel to the light rail corridor between Carlingford to Camellia, and extend across the James Ruse Drive bridge to Tramway Avenue.

Source: <https://www.parramattalightrail.nsw.gov.au/Westmead-Carlingford>



## PRECEDENT 04 MONON GREENWAY, CARMEL INDIANA, USA

“This new expanded Monon Boulevard will quickly become a major epicenter of activity in Midtown and the Arts & Design District... It is also designed to function as a corridor for many who will live and work in this area, providing a safe way to commute to their jobs or take a short walk to the market.” - Carmel Mayor Jim Brainard

Carmel, Indiana is an affluent suburban city that, like most traditional American suburbs, values low density home ownership and private automobiles, and its “downtown” is dominated by single-use buildings surrounded by surface parking. At the same time, the city is facing rapid growth, and is led by a visionary Mayor who wants to see Carmel’s city center meet its potential as a sustainable, vibrant, mixed-use downtown.

In order to ensure a cohesive vision for the rapidly changing downtown, Gehl was invited by the city to build on the existing urban framework for the future of downtown.

The vision set forth by Gehl built on existing plans, and emphasized the transformation of downtown from a place with a few destination points to a complete neighborhood destination by:

1. Making a more walkable and human scaled downtown
2. Introducing a 21st century approach to mobility focused on greater options for accessibility
3. Transforming the Monon Trail into an urban and ecological spine
4. Providing a framework to support vibrant public life.

The Monon Trail is a key element of this transformative project. As it stood, the trail was an 18-mile former railway line that was converted to a pedestrian and bicycle trail, and ran through the city’s heart, linking the existing Arts District, Civic Center and several proposed developments.

Gehl’s concept design built upon this existing asset by transforming the Monon Trail into an urban and ecological corridor that stitches together existing and future developments. Each segment took aesthetic and programming cues from the surrounding neighborhood context, strengthening district identities while maintaining the trail’s integrity as a regional bicycle trail.

Source: <https://gehlpeople.com/projects/monon-trail-urban-bikeway-design/>



## PRECEDENT 05 BLOOMINGDALE TRAIL, CHICAGO - USA

“We can’t say we want to be more sustainable, but we also want to widen our roads and make it easier to drive, it just doesn’t work that way.”

- Gabe Klein, Transportation Commissioner

Back in 2004, Chicago completed construction of Millennium Park—one of North America’s largest public space projects of the last decade. Today the city is making progress on two more public space plans; the redesign of an old elevated rail line in the city’s North Side and the transformation of Navy Pier.

The latter project seeks to reimagine (and re-dignify) a major component of Daniel Burnham’s 1909 masterplan that has since succumb to pressures of commercialization and tourism. The \$85 million project is set for completion by the Pier’s centennial in 2016 and led by James Corner Field Operations in collaboration with several other architects and designers including Bruce Mau and French botanist Patrick Blanc.

The old rail line (called the Bloomingdale Trail) will be transformed into an elevated park à la New York’s High Line, but will be twice as long as its East Coast predecessor at 3 miles (5km) and feature bicycle access. The Emanuel administration has secured initial funding for the \$100 million project, which is scheduled to be completed by 2014.

The old way of doing things is coming to an end. As Chicago Transportation Commissioner Gabe Klein bravely announced, “We can’t say we want to be more sustainable, but we also want to widen our roads and make it easier to drive, it just doesn’t work that way.” As these projects for pedestrians and cyclists come to fruition, their message is clear: Chicago’s future is one for people. We think Mr. Burnham would be proud.

Source: <https://gehlpeople.com/blog/chicago-future/>



## PRECEDENT 06 PARIS CENTRAL SQUARES PEDESTRIANISATION PLAN

“Pedestrians and cyclists will gain 50 percent more space on average... the goal is to make the squares “places of life, agreeable and re-balanced”, rather than simply “places of movement”

- Christophe Najdovski, Deputy head of highways

*Last year, Paris Mayor Anne Hidalgo promised to makeover seven major Parisian squares. This March, following a public consultation, Paris City Hall came up with the goods, providing detailed plans that will transform these famous, beautiful spaces in the period between now and 2020.*

*Looking at the details, it seems the city's ambitions haven't so far been diluted. Each square will be semi-pedestrianized—literally so, as a mandatory 50 percent of each square's surface area will be given over to pedestrians. This means slicing away large sections of space currently allotted to cars, abolishing some lanes and slowing traffic in others. In each square, road vehicles will be restricted to lanes with a maximum width of 12 meters (39 feet), with the rest ceded to pedestrians and cyclists.*

*The scope of this semi-pedestrianization is more impressive when you consider what Paris has to work with. These squares aren't quiet spaces hidden away from the city's main avenues. They are the very axes through which most of inner Paris's road traffic is currently channeled. Here we look at three of the seven makeover plans to see how the squares will be re-shaped and given more space to breathe.*

By Feargus O'Sullivan, 2 April 2016

Source: <https://www.bloomberg.com/news/articles/2016-04-01/paris-s-famous-public-squares-will-get-a-pedestrian-friendly-makeover>

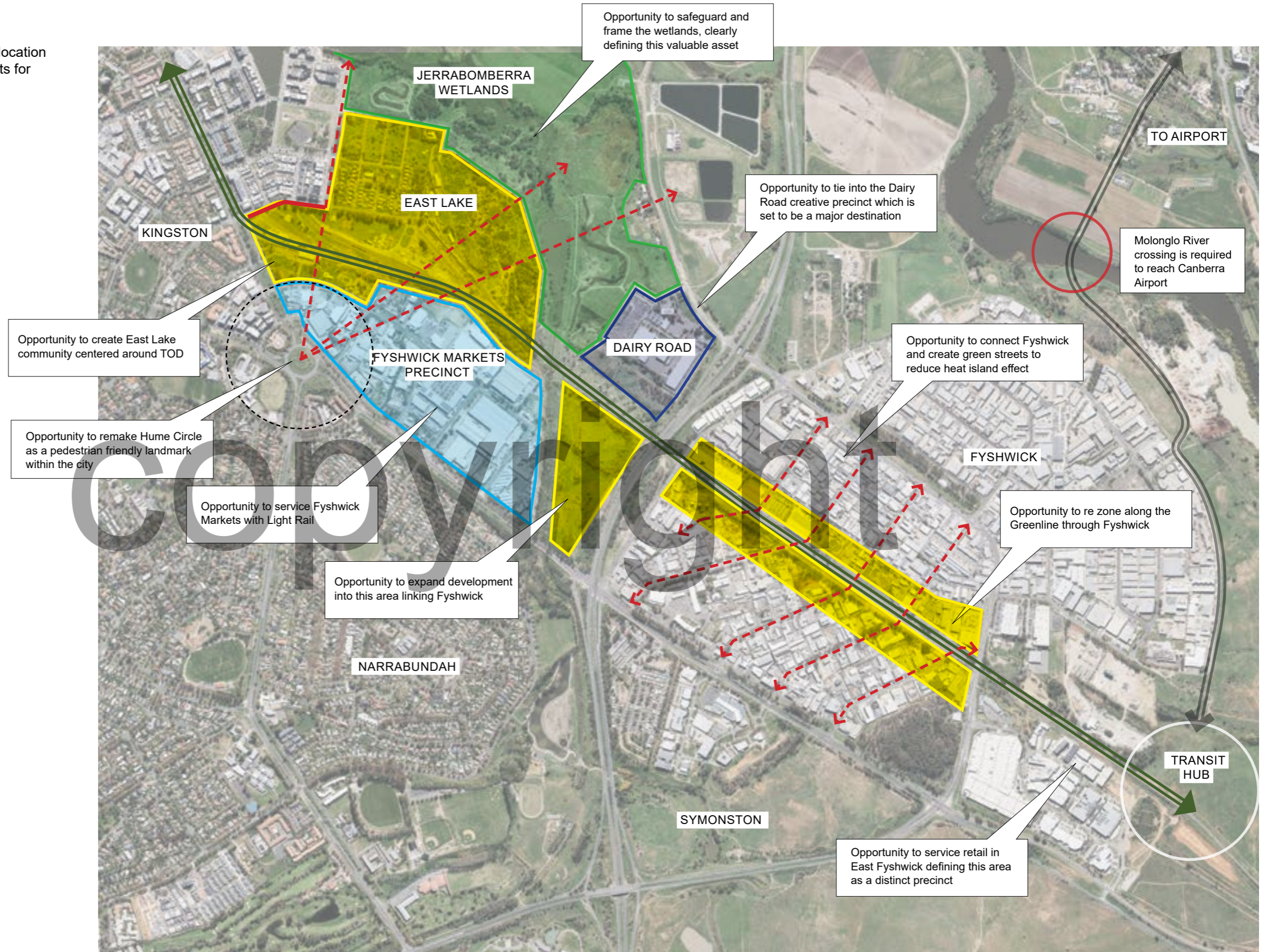


# 6 Vision + Schematic Plan

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# 6.1 CONTEXT + SITE ANALYSIS - OPPORTUNITIES + CONSTRAINTS

The realignment of the light rail in the alternate location presents a series of opportunities and constraints for various precincts in East Canberra.



Scale 1:40,000 @ A3

## 6.2 VISION + SCHEMATIC PLAN - ILLUSTRATIVE PLAN

This schematic plan describes the potential transformation of Eastern Canberra through a significant urban renewal project - The Canberra Greenline and Urban Renewal Precincts.

The below includes a series of new place opportunities which harnesses the momentum of current projects and creates a series of legacy projects to create a more connected, healthy city.

### 1. The Causeway Light Rail Station

A new station for old. Kingston Railway Station becomes a Light Rail node.

### 2. Hume Circle

Potential transformation into a landmark space. Re-alignment of the roadways connects to the wetlands.

### 3. Hume Avenue

A newly established axis as per the Griffin's plan, framing the edge of the wetlands.

### 4. Wetlands Visitors Centre

A Wetlands Visitor's Centre to celebrate and educate about this unique habitat.

### 5. Wetlands Park

A public park at the edge of the Wetlands.

### 6. Fyshwick Market Place

Serving a new culinary precinct expanding on the existing markets.

### 7. Dairy Road Light Rail Station

Servicing Dairy Road and an expanded CIT campus.

### 8. Dairy Road

A hub of innovation and culture.

### 9. CIT Precinct

Education and skills training.

### 10. Fyshwick Light Rail Station

A new public transport stop in the heart of Fyshwick, encouraging an evolution of the suburb.

### 11. East Fyshwick Light Rail Station

Servicing retail and industrial

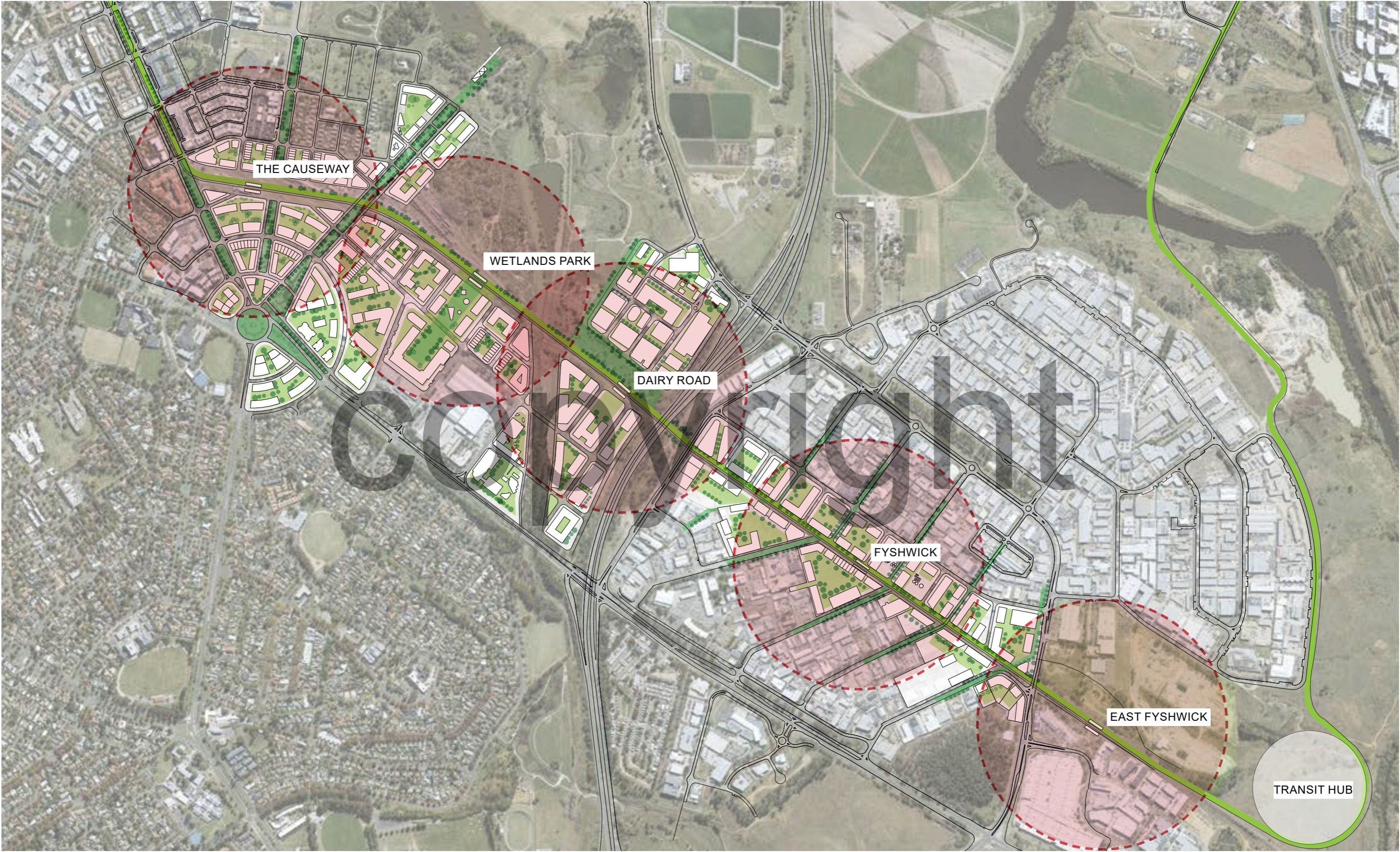
### 12. Multi-modal Transport Hub (incl. Canberra Railway Station)



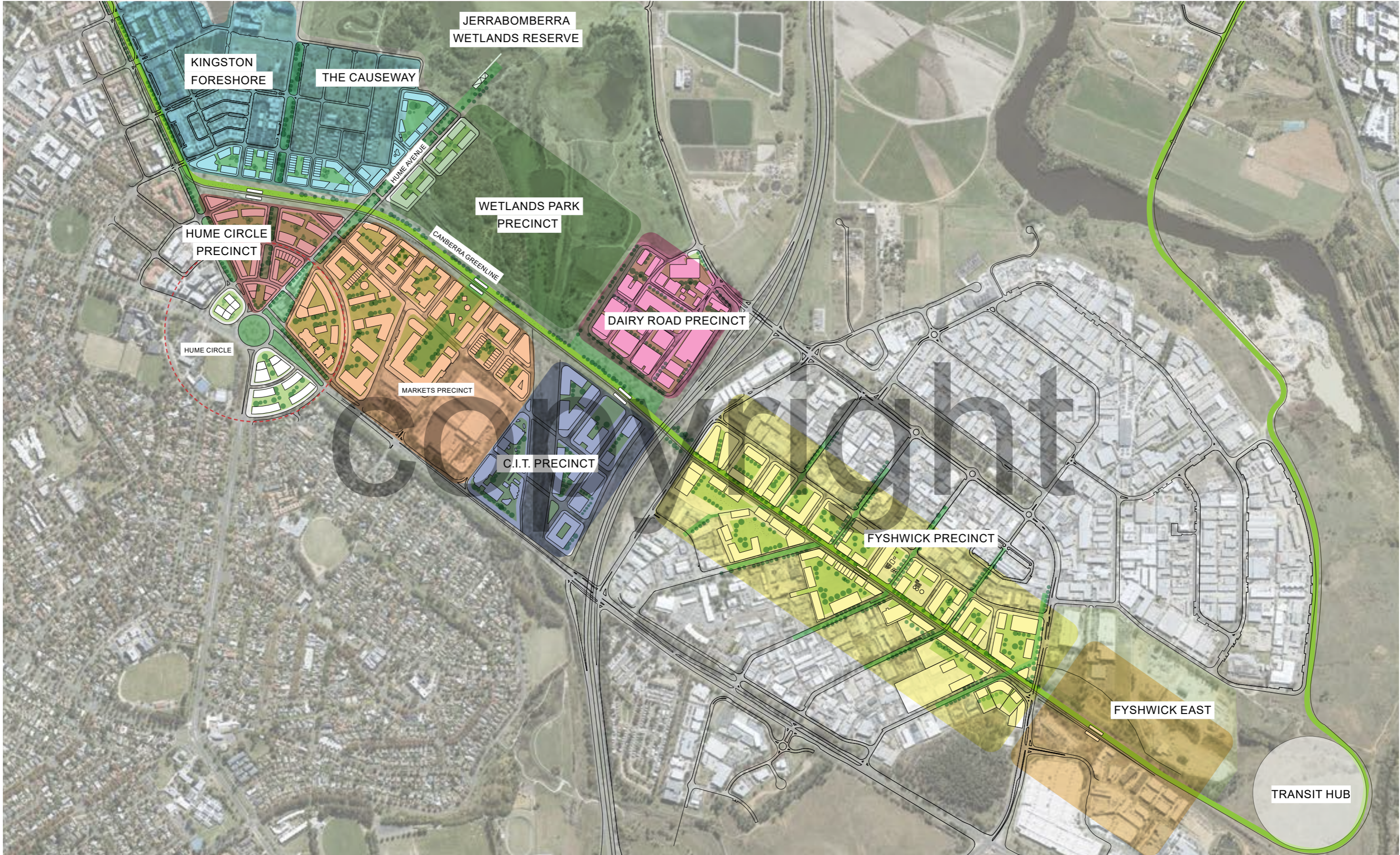
AERIAL PLAN - TODAY



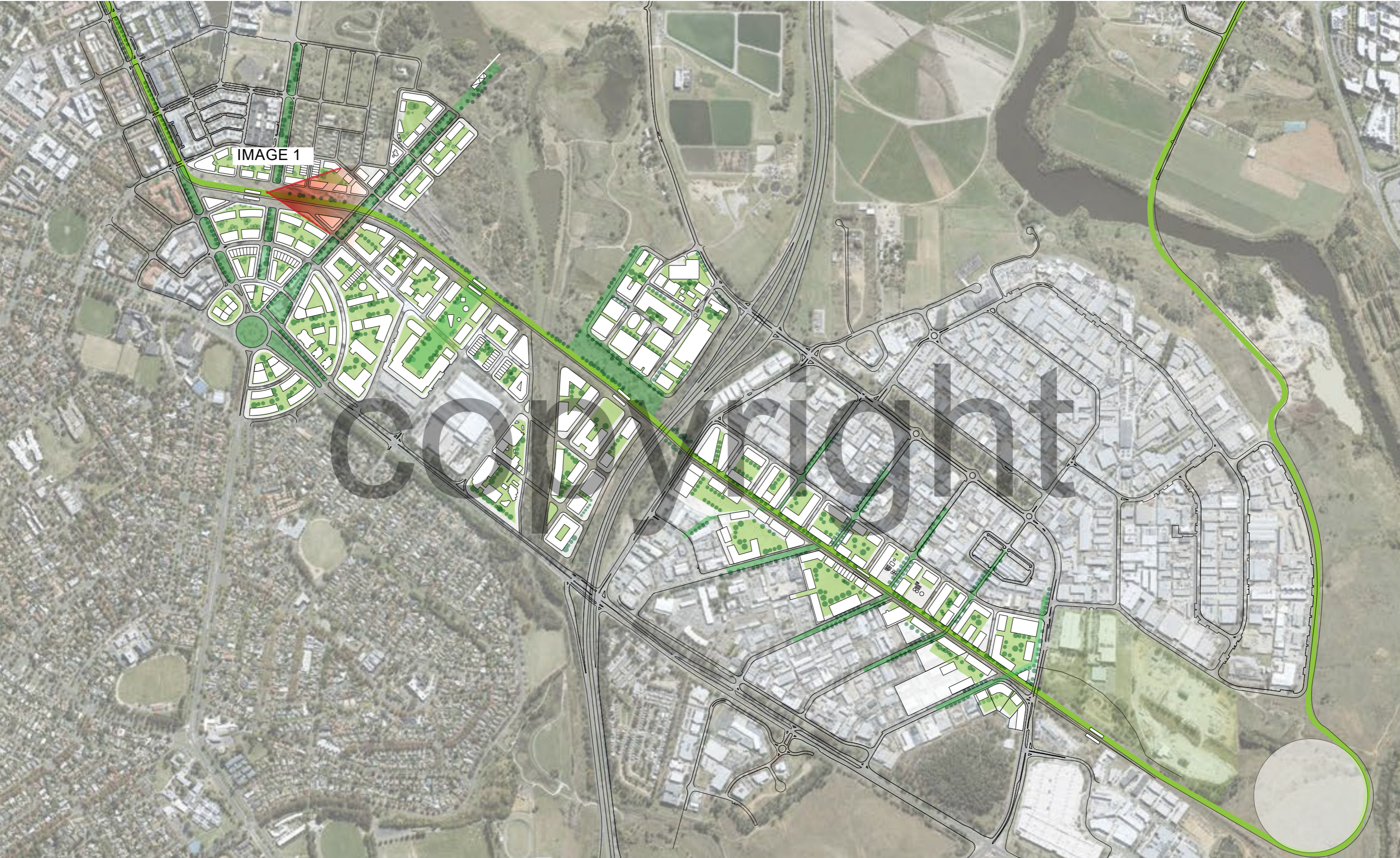
**SCHEMATIC PLAN - POTENTIAL LIGHT RAIL STOPS**



# SCHEMATIC PLAN - EAST CANBERRA PRECINCTS



LOCATION PLAN - CONCEPT IMAGE 1 - KINGSTON



6.4 CONCEPT IMAGE - TRAVELLING TOWARDS WETLANDS PARK



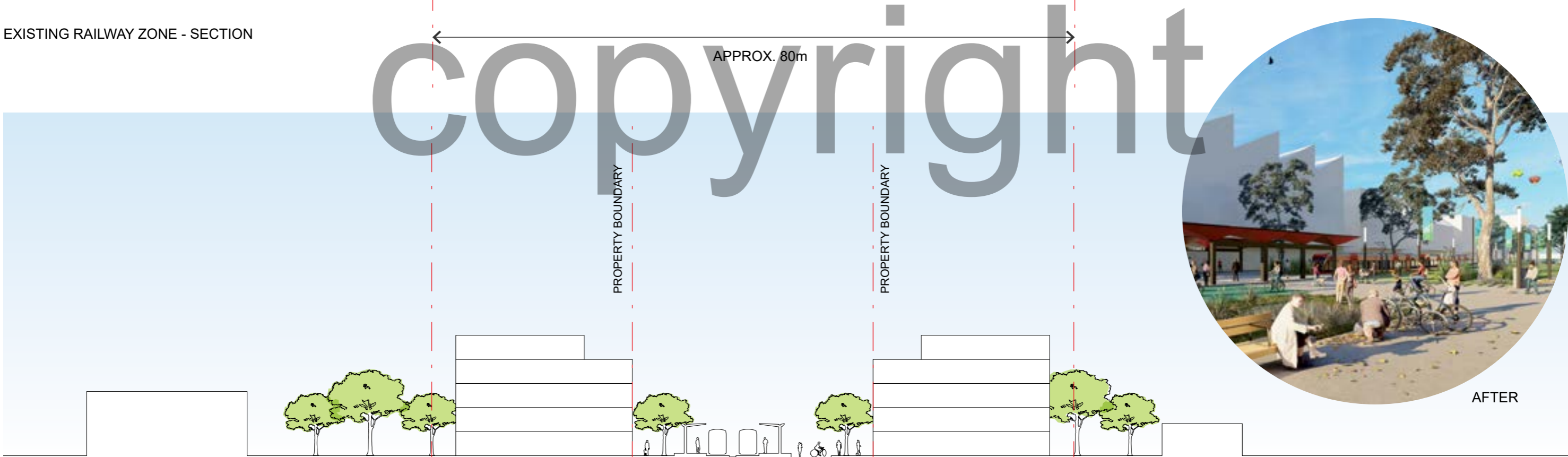
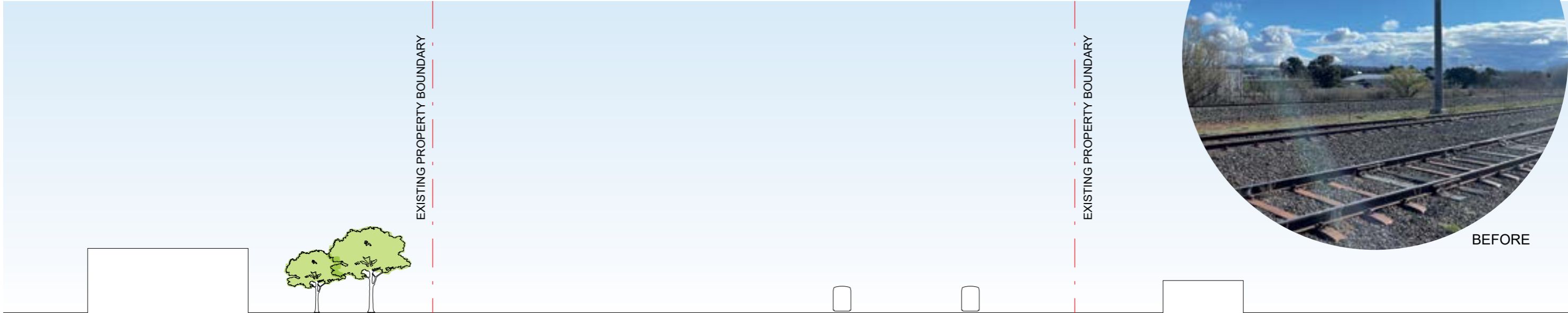
# 6.5 FYSHWICK CORRIDOR - EXISTING CONDITION

The existing Fyshwick rail corridor is approximately 80m wide with some variation along its length.

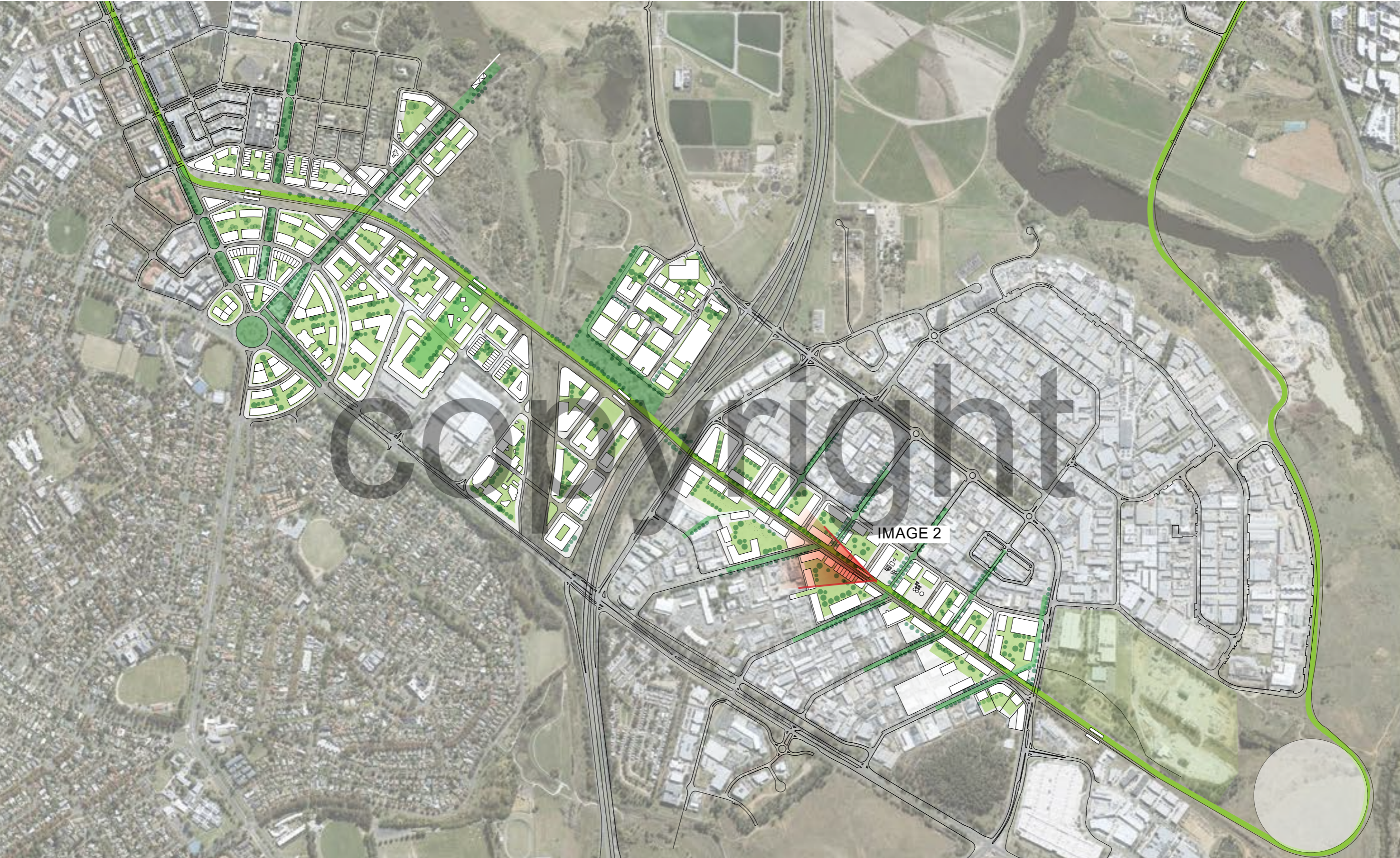
This width would allow a light rail corridor with an active travel path plus building frontages of 30m with two 25m development zones either side.



6.6 FYSHWICK CORRIDOR - SECTIONS



LOCATION PLAN - CONCEPT IMAGE 2 - FYSHWICK



6.7 CONCEPT IMAGE - FYSHWICK RAIL CORRIDOR



# Summary of Key Benefits

- The Canberra 'Greenline' is a legacy project to transform Canberra's urban landscape
- Links all forms of transport (including the airport) into high performance network with local and interstate potential
- Pioneers an active transport 'highway' - the first car-free avenue in Canberra
- Safeguards and frames the Jerrabomberra Wetlands with a new city park
- Unlocks the potential of land adjacent the Light Rail to create an extensive urban renewal project
- Build the Light Rail in an existing rail corridor to save on construction cost
- Minimised disruption to arterial traffic during construction
- Transform Fyshwick into a greener neighbourhood, reducing heat island effect
- Links key public sites including Kingston Foreshore, Fyshwick Markets, Dairy Road and Fyshwick

Thank you.  
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STEWART  
ARCHITECTURE

# Submission to the National Capital Authority

Re: Draft Amendment 102 – Hume Circle Precinct

## 1. Introduction

I was born in Canberra and have lived here all my life. I have seen this city grow carefully over many decades, and I care deeply about the decisions we make today that will shape it tomorrow.

I support well-planned growth and understand that Canberra must continue to evolve. However, after reviewing Draft Amendment 102 (DA102), I remain concerned that a number of practical and strategic questions have not yet been clearly answered.

My comments focus on infrastructure capacity, process sequencing, consultation integrity and the planning logic underpinning the proposed height regime.

## 2. Infrastructure capacity and who pays

If development at the scale contemplated by DA102 proceeds, a very large number of additional residents will be concentrated into a relatively constrained Inner South location.

The practical question that follows is straightforward: **who is going to pay for the supporting infrastructure?**

This includes:

- water and sewer upgrades
- electricity network capacity
- stormwater and drainage systems
- local road upgrades
- traffic management at Hume Circle
- and expansion of nearby schools and community services

The material released to date does not clearly demonstrate funded infrastructure sequencing to support the proposed uplift.

This matters because the surrounding network is already under pressure. Roads such as Canberra Avenue, Wentworth Avenue and nearby local connections carry significant existing volumes. Hume Circle itself is already a complex movement environment.

Even moderate increases in dwelling yield can produce disproportionate intersection stress where road geometry is constrained. Without committed infrastructure staging, the amendment risks introducing what planners commonly recognise as **premature intensification**.

## 3. Transport realism and historic planning context

Canberra's original planning vision placed strong emphasis on properly sequenced transport infrastructure.

In the Commonwealth publication ***Canberra: Capital City of the Commonwealth of Australia (1913)***, the early planners observed:

“There must be access to the Capital of Australia from practically every main channel of commercial intercourse... and... a local system of railways linking together the various parts of the Federal Territory.”

That principle still rings true.

Higher density can work well in Canberra, but only where transport capacity and servicing are sequenced ahead of, or at least alongside, intensification.

At present:

- the precinct is not served by light rail
- high-frequency public transport remains limited
- private vehicle dependence is still high
- and surrounding arterial roads already experience peak pressure

In this context, the characterisation of the area as capable of absorbing substantial uplift requires clearer supporting evidence.

#### **4. Scale, feasibility and market signalling**

DA102 permits building heights up to 15 storeys in proximity to established 2–3 storey residential complexes, including Staffordshire Terrace and nearby developments.

Even in the absence of an immediate development application, the introduction of this permissibility materially alters planning expectations and market behaviour.

Property markets respond rationally to anticipated change. Where high-rise potential is introduced without clear infrastructure delivery or realistic redevelopment pathways, the likely outcome is prolonged uncertainty rather than orderly renewal.

This is particularly relevant where:

- redevelopment would require consolidation of numerous individual strata owners
- transaction complexity is high
- and the timing of any feasible redevelopment is inherently uncertain

The result is concentrated planning pressure on an established community without a clearly deliverable redevelopment horizon.

#### **5. Social infrastructure and community impact**

Population growth of the magnitude contemplated will inevitably require expanded schooling capacity and community services.

It is currently unclear:

- where additional school capacity would be accommodated
- how nearby facilities would expand

- and whether further loss of established homes or mature trees would be required

If residents are progressively displaced through redevelopment pressure over time, there should be a clearly articulated policy framework addressing:

- relocation costs
- stamp duty impacts
- access to comparable housing and associated wellbeing impacts

At present, no clear framework appears to be in place.

## 6. Consultation and process sequencing

The consultation process has left many residents with the impression that information was difficult to interpret and released within a compressed timeframe.

Maps within the amendment material were not always easily readable for ordinary residents, and the consultation period coincided with the holiday period. This has contributed to a perception that the community was brought into the process late.

Figure 6 of the NCA material indicates that earlier proposal stages include discussion with **relevant stakeholders** prior to statutory consultation.

As an affected resident, I do not consider that established residents were engaged at the point the process diagram suggests they should have been. Engagement appears to have occurred after key parameters were already substantially formed.

Clarification of the Authority's stakeholder identification and early engagement pathway would materially assist community confidence. More broadly, the manner in which the amendment was initially communicated has affected community confidence in the process. Many residents first became aware of the potential implications through secondary channels rather than through clear, direct early engagement. Once trust is unsettled at the beginning of a planning process, it is difficult to fully restore. Given the National Capital Authority's ongoing role in shaping Canberra's future, rebuilding and maintaining that trust should be treated as an important planning outcome in its own right.

## 7. Designated Area justification

The Planning and Land Management Act allows areas with special characteristics of the National Capital to be designated.

It is not yet clear what specific national capital characteristics are said to be present in this established residential precinct that would justify the proposed extension of Designated Area controls.

If the intent is to create a "gateway" condition, it would be helpful for the Authority to clearly articulate:

- what nationally significant qualities are being expressed
- how they differ from normal urban renewal
- and why this location has been selected

Without that clarity, the strategic justification appears incomplete.

## **8. A constructive design reflection**

If the policy objective is to create a meaningful national capital marker, there may be merit in considering strong landscape or symbolic design responses in addition to built form.

Historically, Canberra's strength has come from the integration of landscape, movement and civic symbolism. A carefully considered cultural or landscape marker within the Hume Circle setting could potentially deliver a more distinctive arrival experience while preserving surrounding residential stability.

I offer this observation constructively and in the spirit of Canberra's original planning intent.

## **9. Closing**

Canberra has always grown and changed. That is part of its story. But the city has always been at its best when planning walks ahead of pressure, not the other way around.

At present, too many fundamental questions remain unresolved, particularly in relation to:

- infrastructure capacity
- funding responsibility
- stakeholder engagement
- and the justification for expanded controls in this location

I respectfully request that these matters be clearly addressed before Draft Amendment 102 proceeds further.

**Dallas Clifford**

Staffordshire Terrace owner-occupier

# Submission: Draft Amendment 102: Hume Circle Precinct Redevelopment

Submission to the National Capital Planning Authority from Jackie Walsh and Les Williams (Owner/Occupiers Staffordshire Terrace, 13 Sturt Avenue, Griffith, ACT, 2603).

16/02/2026

## Introduction

We write as owner occupiers, and directly impacted stakeholders, to highlight deficiencies and areas of concern relating to Draft Amendment 102 (DA102). This submission is based on the information currently available.

Whilst we support well thought out urban redevelopment and understand the Federal and ACT governments commitment to “establishing 1.2 million new well-located homes over 5 years from 1 July 2024”. This Draft Amendment has expanded the scope of the original proposal to include existing apartment complexes in Sturt Avenue and MacMillan Crescent without consideration to the existing residents, or to potential environmental, infrastructure and social implications.

This submission outlines potential deficiencies and areas of concern regarding the process and the substance of the proposal, including:

- lack of proper stakeholder consultation
- environmental and biodiversity risks
- shadowing and solar power implications
- traffic and infrastructure pressures
- existing safety issues at Hume Circle and surrounds
- inconsistency of the proposal with the founding urban planning principles of Walter Burley Griffin.

## Lack of Consultation with Impacted Stakeholders

It is of concern that the process leading to Draft Amendment 102 has not included meaningful engagement with directly affected stakeholders. Local residents, community groups such as the Inner South Canberra Community Council, and strata management organisations of impacted apartments have reported insufficient notification and opportunity for input noting that:

- public notice occurred during the January holiday period on 5 January 2026 (however the public gazettal date states 8 January 2026) when most Canberrans are away on holidays
- many impacted stakeholders became aware of it via local news channels on 21 January 2026, and in our case our strata management informed us via email on 22 January 2026 because we were interstate at the time
- initial consultation time frames were short providing residents with limited time to gather information and prepare a submission.

The absence of effective engagement and consultation with impacted stakeholders, undermines public trust and risks the implementation of a development that does not reflect the needs or values of the community and appears inconsistent with the NCA's own community engagement principles.

## Environmental and Biodiversity Impacts

The proposed redevelopment of Griffith Section 25 poses significant risks to local environmental values. The site currently comprises mature trees, green space, and habitat supporting urban biodiversity, including native birds such as white winged chuffs, plovers, king parrots, wattle birds and small mammals including possums. Its redevelopment threatens to remove these ecological assets, leading to a loss of green corridors and a reduction in urban canopy coverage. Such outcomes are inconsistent with established environmental objectives for the National Capital and pose long-term consequences for local flora and fauna. The reduction in permeable surfaces also increases the risk of urban heat effects and diminishes the precinct's ecological function. Urban heat has recently been highlighted on the local news as a growing problem for Canberra due to development.

## Shadowing and Solar Power Concerns

The construction of high-density apartments such as the suggested 15-storey apartment buildings is likely to result in significant shadowing of adjacent residential properties and public spaces. Shadow diagrams for similar developments demonstrate that buildings of this scale cast extensive shadows, particularly during winter months, reducing natural sunlight for neighbouring dwellings. This not only impacts residential amenity but may also compromise the effectiveness of existing or future rooftop solar installations, undermining local sustainability efforts and the capacity of residents to reduce energy costs and emissions. Recent conversations with impacted stakeholders in homes on MacMillan Crescent have highlighted this to me as a significant concern.

## Traffic and Infrastructure Strain

The increase in population density resulting from a high-rise development will place considerable additional pressure on local transport networks, including arterial roads

leading to and from Hume Circle. This precinct already experiences peak-hour congestion, and increased vehicle movements will exacerbate delays and reduce road safety and access to public transport is limited.

Furthermore, existing infrastructure for sewage and stormwater is not designed to accommodate the demands of a high-density development. Overloading these systems increases the risk of overflows, blockages, and localised flooding, with associated public health and environmental risks. Only last week this was highlighted as in issue for Canberra on the local news considering Canberra's urban development agenda.

The Hume Circle Precinct currently faces significant challenges due to the lack of public transport options available to residents and visitors. This deficiency has led to increased reliance on private vehicles, contributing to traffic congestion and environmental concerns. The absence of efficient and accessible public transport services not only limits mobility for those without access to a car but also hinders the overall development and connectivity of the area. Addressing this issue is crucial for promoting sustainable urban growth and improving the quality of life for the community.

### Safety Concerns: High Accident Zone

Hume Circle is already recognised as a high accident zone by the ACT government with a reported 45 crashes in 2024 due to the current traffic configuration contributing.

The significant increase in vehicular and pedestrian traffic anticipated from increased residential apartments such as the suggested 15-storey residential towers will further elevate these risks. Without substantial investment in road safety improvements, the proposed development is likely to exacerbate an already hazardous situation, placing residents and commuters at increased risk.

Additionally, there are schools around the Hume Circle precinct further increasing safety concerns for pedestrians, as recently as March 2025 two schoolboys were seriously injured crossing Canberra Avenue near St Edmunds.

### Alignment with Walter Burley Griffin's Vision

The proposed draft amendment 102 is fundamentally at odds with the urban design principles established by Walter Burley Griffin. Griffin's vision for the city emphasised medium-density, human-scale developments, integration with natural landscapes, and the preservation of open space. Historical records indicate that Griffin was a vocal opponent of high-density and tall buildings, advocating instead for a garden city approach that prioritised liveability and harmony with the environment. For example, in his correspondence and public statements during the planning of Canberra, Griffin repeatedly criticised proposals for excessive building heights, arguing that such developments would detract from the city's character and the amenity of its residents. The scale and density of the proposed apartment blocks are inconsistent with these

foundational principles and would set an undesirable precedent for the precinct and the broader National Capital region.

Additionally, high density and tall buildings are out of step with the inner south's current environment where apartments are mostly 3-6 stories, the suggested 15-story apartment complex would not complement the existing environment and would be better suited to a Town Centre environment such as Woden or Belconnen.

## Formal Request

That the NCA provide more meaningful engagement and consultation with impacted stakeholders and publish more information relating to the proposal in relation to:

- environmental (including urban heat) and biodiversity impacts
- overshadowing and solar modelling
- social infrastructure and capacity analysis
- traffic and infrastructure strain
- safety concerns
- realistic dwelling yield projections.

I respectfully request that the National Capital Planning Authority:

- Pause the Draft Amendment 102 in its current form
- Exclude existing low-rise residential areas on Sturt Avenue and MacMillan Crescent from the Draft Amendment 102.
- Commence genuine community consultation to re-establish trust and confidence and ensure transparency by publishing relevant modelling and impact reports prior to final decisions.
- Pursue planning outcomes that better reflect the interests of the community and the legacy of Burley Griffin.

Yours sincerely,

Jackie Walsh

Les Williams

To the National Capital Authority,

I am writing to formally record my objection to Draft Amendment 102 regarding the Hume Circle Precinct. While I support the sensible renewal of the city, I have significant concerns regarding several aspects of this proposal:

**Building Heights:** The proposal for building heights up to 15 storeys is excessive for this location. It represents a radical departure from the established character of the Inner South and will cause significant overshadowing, create wind tunnels and cause loss of privacy for existing residential complexes.

**Infrastructure & Traffic:** The Hume Circle roundabout is already a high-pressure point. Adding high-density residential units without a proven, pre-funded traffic management plan is irresponsible and will lead to severe congestion on Canberra Avenue and Wentworth Avenue. Also with a great increase in housing density and creating a 'hub' for locals and visitors, there is already insufficient parking in the Kingston and Foreshore area and this will only add to that burden, especially with other the proposed changes to the Kingston Foreshore removing the parking behind the Glassworks and Old Bus Depot.

One of my largest concerns is the impact on the Jerrabomberra Wetlands with such high density housing in such close proximity. The Jerrabomberra Wetlands are recognised as one of the ACT's most significant wetland habitats and a sanctuary for both local and migratory birds. While the Hume Circle precinct is not immediately adjacent to the wetlands, it forms part of the broader ecological landscape. Redevelopment could:

- Increase noise, lighting, and human activity
- Reduce buffer zones that help protect wildlife
- Increase pressure on nearby green corridors

This is especially relevant given the wetlands' role as a refuge for migratory birds and threatened species.

Finally, I don't feel this proposal is in any way representing The Griffins 'vision' of a gateway into the east corridor of Canberra. I can appreciate creating a sense of arrival when entering our city from Canberra Avenue, but a circle high of high rise apartments and traffic congestion does not create a sense of arrival, only a sense of frustration for the people and traffic that have to commute through it and even worse for the people that reside with in it.

For a city that is known as the bush capital, it is quickly becoming a city of glass and concrete rather than green spaces and beautiful old tree lined streets which Canberra Avenue currently is. I ask that the NCA reconsider the density limits and protect the existing residential amenity of the McMillan Crescent and Dalby Street areas.

Regards,

Jenni Martin

Griffith

**To whom it may concern,**

I am writing to you as a resident of Narrabundah to express my strong opposition to the proposed Hume Circle Precinct redevelopment (Draft Amendment 102).

For the following reason.

### **1. Lack of Meaningful Community Consultation**

As a resident of Narrabundah, I wish to register my strongest objection to the **lack of transparency and genuine community consultation** regarding this project.

- **Awareness Gap:** There has been a significant failure in communicating the scale of this project to those most affected. Many residents, myself included, were entirely unaware of the proposed displacement of established households.
- **Accessibility:** It is unclear where and when the "community consultation" sessions occurred. The absence of direct notification to impacted residents suggests a process that prioritizes bureaucratic speed over democratic engagement.

### **2. Displacement of Residents**

The proposal to rezone existing residential blocks for high-density development is deeply concerning.

- **Loss of Community:** This project threatens to displace many residents who have built their lives in this area. A "renewal" project should enhance the lives of current citizens, not force them out to make way for new developments.
- **Social Impact:** The removal of established residents destroys the social fabric and community cohesion that Narrabundah is known for.

### **3. Incompatibility with the Griffith/Narrabundah Plans**

The proposal to introduce **15-storey high-rise housing** is a radical departure from the existing character of our suburbs.

- **Planning Conflict:** These plans directly contradict the long-standing Griffith and Narrabundah precinct plans, which emphasize medium-density, human-scale living and the preservation of green space.
- **Aesthetic Mismatch:** Massively scaled multi-storey towers are inconsistent with the "Garden City" heritage of the Inner South. This is not "filling in the gaps"; it is

an attempt to fundamentally alter the DNA of our neighborhood without resident consent.

#### **4. Impact on Amenities and Environment**

Converting large areas of land into high-rise housing will place an unsustainable burden on local infrastructure.

- **Green Space:** The loss of permeable land and established trees will contribute to the "urban heat island" effect, contrary to the ACT's environmental goals.
- **Congestion:** The Hume Circle is already a significant traffic bottleneck; adding thousands of new residents into a high-rise precinct will lead to gridlock and safety concerns for local pedestrians.

#### **Conclusion and Request for Action**

I call upon the NCA and the ACT Government to:

1. **Halt the progression** of Draft Amendment 102 immediately.
2. **Conduct a comprehensive door-to-door consultation** with all residents within a 2km radius of Hume Circle.
3. **Amend the proposal** to exclude existing residential dwellings from the high-density rezoning, ensuring that no current Narrabundah residents are displaced.

The Hume Circle project in its current form ignores the history and the people of the Inner South. We request a plan that respects the Griffin legacy through preservation, not demolition.

I would like to know exactly where and how this consultation was advertised, as it has clearly failed to reach the very community it affects.

I look forward to your response and a confirmation that my objection has been formally recorded.

Sincerely,

**Camilla Forss**

**Narrabundah Resident**

# Submission to National Capital Plan Draft Amendment 102 – Hume Circle Precinct

Public Transport Association of Canberra | 9 February 2026

## Who we are

The Public Transport Association of Canberra (PTCBR) is a public transport users group with members from all sectors of the community. We work with government, industry and the community to help make a better transport system for Canberra and the surrounding region, and encourage more people to use public transport.

## Our interest in this amendment

PTCBR has a set of core ideas and principles that guide our thinking and advocacy: we believe that high quality public transport increases ridership in the community, which reduces the use and ownership of private vehicles that results in benefits flowing to individuals and households through reduced costs, the community through reduced pollution and congestion, and the government through reduced expenditure on public roads, including externalities such as emergency services and healthcare costs.<sup>1</sup>

We believe that decisions about land use must be made with careful consideration of transport outcomes. As Canberra continues on its journey away from being a car-dominant city and invests more into public and active transport, we advocate for development decisions that will enable convenient and easy use of non-car modes of transport.

## Our views on this amendment

PTCBR strongly supports the intent of Draft Amendment 102 (DA102) to facilitate significant urban renewal in the Hume Circle Precinct. The proposal to transform underutilised industrial land into a high-density, mixed-use precinct presents an exciting opportunity to achieve a sustainable urban renewal outcome in an important central location.

However, we urgently note that the road environment in this area is not appropriate for an area zoned for greater residential and mixed-use development. We

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<sup>1</sup> <https://ptcbr.org/transport-in-canberra/our-vision/>

acknowledge that roads are the remit of the ACT Government, and so we urge in the strongest terms that the National Capital Authority (NCA) and the ACT Government work closely together to consider and create positive transport outcomes for the Hume Circle Precinct. We expand on the reasons for this below.

Hume Circle and the roads feeding into it have been designed for vehicle throughput as the primary goal of the road environment - this means wide roads and high speed limits. These features are not safe or suitable for a place where potential future residents and visitors ought to be able to comfortably travel around by foot, bike, and public transport.

Rezoning the Hume Circle Precinct for more housing, more businesses, and more activity in general must be accompanied by a re-working of the road environment to turn it into an area that is comfortable and safe for pedestrian activity, cycling, and use of public transport stops. This is a significant proposition, as this area is currently the meeting point of major arterial roads. Changing this road environment to deprioritise car throughput and emphasise safe public and active transport use would be a profound shift in the city's road network - but this is what must happen in order for the Hume Circle Precinct to succeed as a quality higher-density residential and mixed-use area.

To ensure this precinct becomes an exemplar of transport-oriented development, the Hume Circle Precinct Code (the Precinct Code) and future Detailed Conditions of Planning Design and Development (DCPDD) must address the needs of public transport users and active travellers.

Our recommendations are intended to ensure that these development controls genuinely prioritise public and active transport and thus enhance liveability.

## Our recommendations

### **Recommendation 1: Prioritise public and active transport**

The DA102 Background Paper introduces the proposed amendment in the context of the National Urban Policy,<sup>2</sup> stating DA102 “supports the national policy agenda” (p. 9). We suggest that the National Urban Policy’s emphasis on “liveable and equitable urban places” that provide, among other things, “effective, safe and affordable transport networks, including active and public transport options” (p. 19) does not appear to be properly reflected in DA102.

The Background Paper notes that the Hume Circle roundabout will be “examined” to support its role as a gateway while providing a safe and efficient through-point for three key avenues.

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<sup>2</sup> <https://www.infrastructure.gov.au/sites/default/files/documents/national-urban-policy.pdf>

As outlined above, changes to the road network are necessary in order for the intent of this amendment to be achieved. We strongly recommend that these changes create an “urban circle” (see [Figure 1](#)) and that an arterial intersection is not retained.



*Figure 1: An example of a landscaped urban circle (Dupont Circle, Washington D.C.)*

In line with this, PTCBR recommends amending Section 4.19.3 of the Precinct Code, as outlined in [Table 1](#), protecting the symbolic importance of Hume Circle as a high-quality urban place.

*Table 1: Proposed and recommended objectives*

Objective	Proposed wording (DA102)	Recommended wording
4.	Realise the advantages of the location as a public transport and employment node at the intersection of significant main avenues.	Realise the advantages of the location as a public transport and employment node at the intersection of significant main avenues, ensuring the movement and place hierarchy prioritises public transport and active travel over private vehicle throughput.

## **Recommendation 2: Align building heights and land uses to maximise public transport patronage**

PTCBR supports the proposal in DA102 to permit taller buildings up to RL617 in the outer “circle” of the precinct. Maximising residential density in this location, within close walking distance of frequent public transport - but not directly facing noisy roads - will support public transport usage without subjecting future residents to unnecessary noise pollution.

We also endorse the proposed mix of land uses permitted in the precinct, including both residential and non-residential uses. Future DCPDDs should encourage the provision of fine-grain ground-floor retail in development fronting the north-south and east-west links. This will promote all-day activity along these key active travel connections between East Lake and rapid public transport services through Hume Circle, ensuring the newly established Griffin geometry creates a lively urban environment rather than a passive landscape.

## **How to contact us**

PTCBR is available to discuss DA102 further with the NCA. Our contact for this submission is Ryan Hemsley, who can be reached at [submissions@ptcbr.org](mailto:submissions@ptcbr.org).

## **Submission to the National Capital Authority**

Re: Draft Amendment 102 - Hume Circle Precinct

To the Chief Planner and Board of the National Capital Authority,

This submission is made as a directly affected resident of Staffordshire Terrace.

This community is made of many hard working members from many backgrounds. These members serve crucial roles, including health, disability services as well as advocacy, and education. Why displace the members of an already functioning community?

### **Community and lifestyle:**

I have experienced the 2 different lifestyles in low rise and high rise. I used to frequent a building in Furzer street Phillip as a client lived there, and there certainly was a significant community difference. Neighbours thrive in Staffordshire Terrace, the building in Furzer street, despite the place appearing luxurious with its views, big swimming pool and games room, the residents are always tense and apprehensive about talking to others. In Staffordshire Terrace, children play cricket together in the courtyard and are always courteous to neighbours, in furzer street, the children fight over the movie and gaming room rather than evolving other kids.

The apartments in Staffordshire terrace have two balconies, one for each side. The rooms are a comfortable size with plenty of space for the lounge room and kitchen. Despite living next to the roundabout, it's quiet at night. The apartments in Furzer street are small, tight and cold. You get 1 balcony, if you're lucky. At night, you are serenaded to a variety of sounds, if it's not the yelling homeless people or hoons, it's the faulty fire alarm that alerts the entire building every couple of days. The last straw for my client is when the elevator malfunctioned and none of the emergency buttons worked. She was trapped for 2 hours and firefighters had to free her. Imagine how bad the outcome would be if it was someone who is elderly or has a serious medical issue.

### **Impacts on trees and wildlife:**

We are blessed with many different types of birds, they find Staffordshire Terrace as much of a home as we do, construction would disrupt them and destroy their much needed habitat.



Our apartments feel cool in the summer and toasty in the winter. As a low rise area, we enjoy the sunrise and sunset from each of our balconies. Our trees and our pot plants grow healthy and strong.



You can't get that from a 15 storey building as one side will grow too cold and not get enough sun, raising electricity costs and trees and plants won't thrive.

Our trees act as a barrier between the building and the traffic on the roundabout, blocking out most of the noise from the road. This was particularly useful during the 2020 bushfires when fire engines were regularly passing.



### **The Building:**

Staffordshire Terrace is unique in style, with its green railings, big ball lamps, brickwork and arches. Newer high rise buildings look too similar to each other, they look oppressive and boring. Staffordshire Terrace is a statement in itself, there's a whimsical beauty to the place.



### **Community Safety:**

In Staffordshire Terrace, we feel safe. We rarely have break-ins, property damage or theft. A 15 storey building could attract attention to potential criminals or predators, especially being this close to schools.

Surrounding properties and local churches need to be considered too. People have the right to live comfortably and celebrate their faith, without worrying about the noise and local inconvenience of construction.

### **In conclusion:**

As a community, we feel blindsided and uncertain about the future. We want to be shown the respect that we deserve, it's our right to live comfortably in the place we call home. We would appreciate clear communication, proper community engagement and understanding.



To the Chief Planner,

I am writing to formally submit my concerns regarding Draft Amendment 102 for the Hume Circle Precinct. As a resident of the surrounding region who frequently travels through this gateway, I am deeply invested in ensuring that any urban renewal in this area respects the existing community and the established character of the Inner South. While I do not live directly within the precinct boundaries, I am a close friend of residents who have already expressed significant reservations about the scale and safety implications of this proposal.

One of my primary concerns involves the proposed building heights, specifically the allowance for structures up to 15 storeys or RL 617 on land surrounding the McMillan Crescent extension. This shift represents a major departure from the established character of Kingston, which is currently defined by a quiet, medium-density environment and tree-lined streets. I am concerned that such high-rise towers are misaligned with the community's identity and will negatively impact the proximity to nature and the "garden city" image that residents value.

Furthermore, the safety implications of increased traffic in this precinct are deeply worrying. The intersection of Leichhardt Street and Wentworth Avenue is already recognized by locals as a high-collision area. Introducing significantly more vehicle movements into an area heavily used by pedestrians and cyclists accessing the Jerrabomberra Wetlands and nearby shops will only heighten these risks. The current proposal does not seem to provide a sufficient solution for these existing hazards, despite the stated aim for a clearer road hierarchy based on a movement and place approach.

I also wish to support the calls for an improved consultation process that more directly engages those impacted. I echo the petition sponsored in the ACT Legislative Assembly asking for the proposal to be amended to exclude established low-rise residential complexes and their immediate surrounds. It is vital that the NCA demonstrates deeper engagement with the residents directly impacted by these zoning changes before making a recommendation to the Minister. Thank you for extending the consultation period to February 17 to allow for this additional feedback.

Sincerely,

Lachlan Walsh

# Submission to the National Capital Authority

## Re: Draft Amendment 102 - Hume Circle Precinct

To the Chief Planner and Board of the National Capital Authority,

This submission is made as a directly affected owner/occupier of Staffordshire Terrace.  
(Section: 84, Block: 7)

I support well-planned urban infill. I support additional housing in appropriate locations. I support design excellence that honours Canberra's planning legacy.

### **Draft Amendment 102 (DA102), in its current form, does not meet that standard.**

The amendment establishes a new precinct framework, expands Designated Area controls, and enables building heights up to 15 storeys without first demonstrating that the necessary planning, environmental, social, and transport foundations are in place. This sequencing is the central concern.

This submission addresses:

- procedural and consultation deficiencies
- planning and built form inconsistencies
- solar, amenity, and environmental risks
- traffic and infrastructure concerns
- community impact
- a constructive alternative (Amendment 103)

## **1. Foundational concerns: what DA102 has not adequately considered**

### **1.1 Critical impact work appears deferred rather than done**

The background material provides limited evidence that the Authority has completed:

- solar access studies
- detailed traffic modelling
- social infrastructure analysis
- environmental and urban heat assessment

prior to proposing a major new planning framework. The publicly available material does not clearly quantify the dwelling yield assumptions underpinning the proposed height envelope. Given that building height appears to be a primary mechanism for delivering additional housing supply, transparency regarding the projected dwelling capacity and associated infrastructure demand would materially assist in evaluating whether the proposed scale is proportionate and evidence-based.

## 1.2 Existing residential communities are not meaningfully addressed

DA102 does not explicitly engage with the presence, function, or value of the established low-rise residential precincts within the affected area. This omission matters because:

- Section 84 Griffith contains **well over 200 apartments in 2–3 storey buildings in good condition**, already providing the “missing middle” housing outcome often sought in policy.
- the area represents one of the more affordable Inner South housing clusters.
- the precinct is already well-treed and functioning as a landscaped buffer.

A planning framework that materially affects an established community should acknowledge it directly and assess impacts explicitly.

## 1.3 Consultation integrity concerns are serious and widely shared

Multiple interested parties, including the Inner South Canberra Community Council, raise consistent concerns:

- public notice occurred during the holiday period
- initial consultation timeframes were extremely compressed
- residents learned of potential impacts late in the process
- engagement appears inconsistent with the NCA's own Community Engagement principles

A threshold issue arises as to whether the statutory consultation requirements under section 15 of the Planning and Land Management Act 1988 have been fully satisfied in respect of Draft Amendment 102. Based on the publicly available timeline, there appears to be a compression between gazettal, newspaper publication, and the effective consultation period that may not align with the intent of section 15 to provide affected parties a genuine opportunity for informed participation. Given the significance of the proposed planning changes and the number of existing residents potentially affected, the Authority is respectfully requested to publish a detailed procedural chronology demonstrating compliance with the Act.

Given the location on Ngunnawal Country and the significance attributed to landscape and national capital values, it is unclear from the published material whether early and meaningful engagement has occurred with relevant First Nations stakeholders. Clarification of the scope and timing of any such consultation would materially assist confidence in the robustness of the planning process.

It is also noted that significant extensions of Designated Area controls into established residential settings have historically been relatively uncommon, with earlier precedents such as Amendment 39 (2005) undertaken in materially different planning contexts. This reinforces the importance of clear justification and robust procedural transparency where such boundary changes are proposed.

## 1.4 Environmental and biodiversity considerations

Residents report the regular nesting presence of protected native masked lapwings (commonly known as plovers) within the Hume Circle roundabout landscape. The publicly available documentation does not clearly indicate whether targeted ecological surveys have been undertaken to assess potential impacts on

nesting habitat. Given the scale of proposed change to the public realm and surrounding built form, clarification of the Authority's ecological assessment and species protection approach would materially assist confidence in the environmental robustness of the proposal.

## **2. Planning logic and built form: the height proposition is not well justified**

### **2.1 Hume Circle is a gateway, not a town centre**

The proposed heights of up to 15 storeys sit uneasily with the actual urban context.

Key planning realities:

- Hume Place is not a designated town centre
- approximately **200 degrees of the roundabout is embedded in residential and school precincts**
- comparable nationally significant intersections in the Inner South do not carry 15-storey built form

These factors suggest a need for calibration rather than escalation.

### **2.2 Precedent across Canberra points to more moderate scale**

Evidence and comparative context indicate:

- New Acton's taller buildings sit effectively within the CBD context
- the Northbourne gateway buildings peak around **11 storeys**
- recent Inner South developments along Canberra Avenue typically sit in the **6–8 storey** range
- the parliamentary zone includes office buildings closer to **five storeys**

This raises a logical planning question as to whether Hume Circle warrants a higher and more abrupt height regime than more nationally prominent locations.

### **2.3 Likely redevelopment capacity exists elsewhere**

Planning analysis identifies more logical uplift locations, including:

- Railway Station / Fyshwick precinct
- Ramada Hotel precinct
- landfill / Causeway-adjacent areas

These sites present fewer fragmentation issues than large, multi-owner strata complexes such as Staffordshire Terrace. Directing height and density toward structurally feasible sites is sound planning practice. There also appears to be an emerging misalignment between the stand-alone advancement of the Hume Circle precinct and the broader East Lake planning context being progressed by the ACT Government. In the absence of an integrated, cross-jurisdictional framework, it is difficult to fully assess

cumulative traffic, infrastructure, and urban form impacts across the wider precinct. Greater clarity on how Draft Amendment 102 interfaces with the broader East Lake planning program would materially strengthen confidence in the strategic coherence of the proposal.

## **2.4 Justification for expanded Designated Area controls requires further demonstration**

The Planning and Land Management Act enables areas of the National Capital to be designated where special national characteristics are clearly present. On the basis of the material currently in the public domain, it is difficult to identify what specific national capital attributes within this established residential setting warrant the proposed extension of Designated Area controls.

Draft Amendment 102 relies in part on a “gateway” framing. Historically, gateway treatments in Canberra were closely associated with coordinated national movement infrastructure and major civic arrival sequences. Griffin’s planning intent for approach corridors was embedded within an integrated transport vision, including the anticipated rail spine toward Jervis Bay and the wider regional network.

That level of strategic infrastructure context is not presently evident at Hume Circle. The location:

- is not rail-served
- does not operate as a metropolitan interchange of national significance
- functions primarily as a vehicular roundabout within a residential and school catchment

In this context, the case for elevating the precinct to a heightened Designated Area status would benefit from much clearer articulation.

The presence of redevelopment capacity alone does not inherently establish national capital significance, and increased building height does not, of itself, create gateway character. Without the civic, transport and symbolic elements that historically underpinned Griffin’s gateway logic, the proposed escalation risks appearing misaligned with the actual function of the place. Should the Authority maintain that a gateway condition is appropriate, it would materially assist transparency to clearly set out:

- the specific national capital values being expressed
- the evidence demonstrating those values at this location
- how the proposed scale compares with established Canberra precedent for nationally significant approach corridors

Absent that clearer demonstration, the planning rationale for expanding Designated Area controls in this precinct remains insufficiently substantiated.

## **3. Solar access and residential amenity risks**

### **3.1 Demonstrated winter solar impacts**

Modelling indicates that 15-storey buildings could:

- place adjoining dwellings in shade from mid-morning onward
- leave **approximately 75% of affected apartments without direct winter sunlight**
- produce complete winter noon overshadowing of some dwellings

If accurate, these outcomes would sit uneasily with established ACT planning expectations for solar access.

### **3.2 Potential inconsistency with Territory planning principles**

The analysis notes potential conflict with:

- Territory Plan Rule R110 (reasonable solar access)
- Clause 14.3 sunlight expectations
- solar fence principles
- broader clean energy policy settings

Even where the National Capital Plan technically overrides Territory controls, good planning practice still requires avoidance of unreasonable amenity loss.

### **3.3 Climate and energy implications**

Reduced winter solar access would:

- undermine rooftop solar generation
- increase winter heating demand
- conflict with both ACT and Commonwealth climate objectives

DA102 does not yet demonstrate how these risks would be mitigated.

## **4. Transport and movement: unresolved capacity questions**

### **4.1 The “transport hub” characterisation is contestable**

Evidence on the ground suggests:

- limited high-frequency public transport
- no committed light rail extension
- heavy reliance on private vehicles
- an already complex and busy roundabout environment

The area is **poorly served by public transport**, with only one rapid bus route and limited rail connectivity.

If higher density proceeds, mode shift assumptions must be demonstrated, not implied.

### **4.2 Pedestrian and school safety requires explicit design response**

The precinct sits adjacent to two schools and already experiences significant traffic pressure.

Key design needs identified include:

- well-designed signalisation

- safe pedestrian crossings
- potential overpass consideration
- low traffic speeds
- careful management of pick-up congestion

These matters should be resolved at the framework stage, not left to future proponents.

## **5. Community impacts: the human layer behind the planning map**

Planning is moral work dressed in measurements. This is the community living inside the coloured height diagram.

- **Removed as requested**

These are not sentimental objections. They are the living evidence that “place” is not a diagram. It is care, continuity, and a very practical form of belonging. Planning decisions operate at metropolitan scale but land at human scale. We are the missing-middle, the medium density that is slowly being eradicated.

This community is functioning, stable, and quietly doing the work that housing policy often struggles to create. (Resident examples are anonymised and illustrative of typical circumstances within the complex.)

## 6. Amendment 103: a constructive alternative

This submission proposes an alternative pathway that supports growth while improving planning logic.

**Position:** not anti-growth. Pro-evidence. Pro-fit-for-place planning.

### 6.1 Retain Staffordshire Terrace (and surrounding residential) as a lower-rise buffer

Maintain the existing precinct as:

- a three-storey residential buffer
- a mature canopy zone
- a transitional interface to schools and Narrabundah
- a contributor to the Territory's urban forest objectives

This reflects the ISCCC recommendation to exclude established low-rise complexes between Sturt Avenue and Canberra Avenue.

### 6.2 Focus height where redevelopment is logical

Prioritise uplift in:

- Railway Station / Fyshwick precinct
- other low-intensity or fragmented parcels

This aligns density with feasibility and reduces community disruption.

### 6.3 Replace the 15-storey envelope with a stepped framework

A more coherent structure would be:

- lower-rise edges near existing residential areas
- mid-rise transition zones
- taller elements only where fully justified by context and infrastructure

Even **6 storey development** would make a substantial contribution to housing supply without the same level of impact.

### 6.4 Require the evidence before finalising heights

Before progressing, the Authority should publish:

- full solar and overshadow modelling
- detailed traffic and intersection modelling
- social infrastructure capacity analysis
- environmental and urban heat assessment
- public realm and safety strategy

- realistic dwelling yield projections

Taken together, the current level of publicly available detail leaves a degree of uncertainty as to whether the proposed height envelope, infrastructure assumptions, environmental impacts, and consultation processes are sufficiently resolved to support a major precinct-level amendment. Addressing these matters transparently prior to finalisation would materially strengthen both the technical robustness of the amendment and community confidence in the planning outcome.

## 7. Relief sought

I respectfully request that the National Capital Authority:

- **Reject or pause progression of DA102 in its current form pending substantive revision.**
- Address consultation deficiencies and take concrete steps to restore community confidence.
- Re-examine the proposed height framework against Canberra-wide precedent and demonstrated infrastructure capacity.
- Publish the outstanding technical studies prior to any final decision-making.
- **Remove established low-rise residential precincts south of Canberra Avenue from the amendment**
- Consider an alternative planning pathway that better aligns uplift with infrastructure sequencing and existing residential context by applying a materially stronger and clearly defined buffer with the height regime re-evaluated accordingly.

Canberra can accommodate growth, but it must be proportionate, evidence-led, and transparently planned. In its current form, DA102 does not meet that threshold.

*Submitters name withheld*

Mr. Andrew Smith, Chief Planner, National Capital Authority [draft.amendment@nca.gov.au](mailto:draft.amendment@nca.gov.au)

I offer this submission as an owner/occupier of Section 84 Section 7, responding to proposed Draft Amendment 102 (DA102) to the National Capital Plan, highlighting what I have concluded as I prepared this submission.

## **Executive Summary – Draft Amendment 102 – Hume Circle Precinct**

**1. Developer Expectations and Community Input** Draft Amendment 102 (DA102) sets fixed parameters for building heights (8, 12, and 15 storeys) in the Hume Circle Precinct. This approach establishes clear expectations for developers but limits the scope for meaningful community input in subsequent planning stages, as future consultations will only address minor details within these predetermined frameworks.

**2. Consultation Process and Community Engagement** Community interest in DA102 is high, demonstrated by a petition with over 600 signatures requesting an extension to the submission deadline. While a two-week extension was granted, the consultation period coincided with the January holiday, restricting participation from key groups such as the ACT National Trust. The process has been criticised for lacking inclusivity and transparency, with concerns raised by Senator David Pocock about the pace and nature of densification and the need for genuine community buy-in.

**3. Need for Comprehensive Planning Studies** There is an expectation that essential planning studies—such as 3D modelling visualisation, solar access, traffic analysis, hazardous materials site testing, infrastructure capacity, and environmental impact—should be completed before finalising DA102. Approving the amendment without these studies risks fixing critical development parameters without adequate feasibility studies or community protection.

**4. Impact on Residents and Market Perception** Rezoning introduces uncertainty for hundreds of existing residents regarding property decisions and future developments. The prospect of high-rise buildings may negatively affect the amenity and desirability of the precinct, impacting owner-occupier demand and market perceptions.

**5. Alignment with Canberra’s Planning Legacy** While the Hume Circle’s layout reflects aspects of the Griffin Plan, the proposed high-rise buildings are inconsistent with Canberra’s original vision. Expert advice suggests that such development would not have been envisaged and supported by Walter Burley Griffin. Policymakers are urged to ensure that comprehensive studies—solar modelling, traffic analysis, social infrastructure, character assessment, environmental impact, and public safety—are published before proceeding.

**6. Precedent and Context** Surrounding precincts and major gateway sites in Canberra typically feature lower-rise developments. There is no precedent for 12–15 storey buildings at suburban roundabouts like Hume Place, which is embedded in a residential and school precinct. Traffic and parking concerns, especially around Fyshwick Markets and Hume Place, require careful planning to ensure safety and accessibility.

**7. Key Policy Question** The proposed departure from established development parameters raises questions about consistency with prior planning and the role of the National Capital Authority in safeguarding the national interest and Canberra’s Griffin legacy, rather than prioritising commercial development objectives.

**Recommendation:**

Policymakers should pause the progression of DA102 in its current form, address consultation deficiencies, re-examine height frameworks against prior density precedents, publish missing technical studies, and ensure established low-rise precincts are protected. Consider alternative planning pathways that balance development needs with community interests and Canberra’s planning heritage.

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**Background**

I am a proud veteran and Group Captain in the Royal Australian Air Force, having served for over 38 years in both domestic and international roles. My experience includes coordinating responses to major disasters, such as bushfires and floods, and serving in operations like COVID ASSIST and SLIPPER. I have also contributed to high-level government inquiries, supporting the Joint Standing Committee on Foreign Affairs, Defence and Trade. Through these roles, I have developed a deep appreciation for accountability, transparency, and inclusive consultation—principles that are essential for effective public planning and community engagement.

After living in various cities across Australia and overseas, I chose Canberra as my retirement home for its unique blend of liveability, natural beauty, and strong community networks. The “Bush Capital” ethos, characterised by open spaces, tree-lined streets, and a vibrant mix of interests, offers a quality of life that is unmatched. My residence in Staffordshire Terrace reflects my commitment to these values—safety, convenience, and a sense of belonging.

The foundation of Canberra’s development lies in the Griffin Plan, which established the city’s blueprint for growth and liveability. While the National Capital Authority references this legacy in its planning, my research has shown that the intent of the Griffin Plan raises important questions about current development proposals. I believe that planned densification, when supported by appropriate amenities and genuine community engagement, can enhance Canberra’s character and sustainability. However, this must be achieved through careful feasibility studies, transparent processes, and respect for the city’s heritage.

In summary, my background informs my perspective on DA102: I support thoughtful growth that balances development needs with community interests and the enduring principles of Canberra’s planning legacy.

**Developer Expectations and Planning Framework**

Draft Amendment 102 (DA102) for the Hume Circle Precinct establishes a clear development framework, permitting buildings of 8, 12, and 15 storeys. This sets explicit expectations for developers, effectively defining the permissible scale and scope of future projects. As a result, subsequent planning approvals and community consultation processes will be limited to the finer details of individual developments within these pre-determined height and site parameters. The broader envelope for development is thus fixed, most likely constraining meaningful community input at later stages.

## Community Engagement and Consultation Process

The level of community interest in DA102 is significant, as evidenced by a petition signed by over 600 residents within a single week and undoubtedly would have yielded more if time allowed, requesting an extension to the submission deadline. Reason for the Petition: *“Residents of the Australian Capital Territory draw the attention of the Assembly to Draft Amendment 102 to the National Capital Plan, which proposes significant increases to building height and density within the Hume Circle Precinct, including land on which established low-rise residential complexes are currently located (such as Staffordshire Terrace, Griffith). Residents are concerned about the timing and adequacy of the consultation process, the lack of direct notification to affected owner-occupiers, and the potential loss of established medium-density housing, green space, amenity, and community cohesion. Residents note that this area already provides housing diversity within the inner south and that the proposed changes would permanently alter the character and liveability of the precinct”.*

This led to a two-week extension, closing on 17 February. However, the timing and management of the consultation period have raised concerns. The public consultation was primarily conducted during the January holiday period, limiting the ability of key community groups, such as the ACT National Trust, to participate fully. Notably, the ACT National Trust was only recently informed of the extension, and the revised deadline was not widely publicised. This suggests that the consultation process has not been sufficiently inclusive or transparent.

During the Rural and Regional Affairs Transport Legislation Meeting on 9 February 2026, Senator David Pocock articulated concerns about the pace and nature of the densification process, emphasising the need for genuine community buy-in and clear vision. Feedback from residents indicates that the current process has not allowed for adequate consultation or engagement. While the National Capital Authority (NCA) asserts that further details will be available in subsequent consultation stages, the fundamental parameters—such as building heights and site layouts—will already be established, limiting the scope for meaningful community contribution.

## Need for Comprehensive Planning Studies

It is expected that a range of associated planning studies should have been completed prior to the release of DA102, including:

- Visualisation studies (e.g., 3D modelling, physical models)
- Solar access and shadow diagrams
- Traffic analysis
- Site hazardous materials testing (especially given the proximity to industrial and prior landfill areas)
- Engineering services infrastructure capacity assessments (sewer, power, etc.)
- Environmental impact studies

If DA102 is approved without these studies, key master plan parameters—such as storey limits, block sizes, and street layouts—will be fixed without adequate pre-planning or feasibility analysis. This raises questions about the protections in place for residents and the community if the amendment proceeds. The certainty provided to developers may come at the expense of community interests and national planning objectives.

## Impact on Residents and Market Perception

Residents affected by rezoning face uncertainty regarding the future of their properties, even in the absence of current development applications. This uncertainty complicates decisions about renovation, maintenance, or sale, and introduces stress related to potential future developments. The prospect of high-rise buildings near Hume Place is likely to influence market perceptions and demand for owner-occupier residences, potentially diminishing the amenity and desirability of the precinct.

## Consistency with the Griffin Plan and Canberra's Planning Legacy

While the circular street layout of Hume Circle aligns with aspects of the 1913 Griffin Plan, the proposed 12 and 15 storey buildings are inconsistent with the original vision for Canberra. Expert consultation with Emeritus Professor James Weirick confirms that Walter Burley Griffin would not have supported such high-rise development in this location. Before progressing, the NCA should publish comprehensive studies, including:

- Solar and overshadow modelling
- Detailed traffic and intersection analysis
- Social infrastructure capacity assessment
- Character analysis of the area
- Environmental and urban heat impact assessment
- Public realm and safety strategy
- Realistic dwelling yield projections

## Observations on Adjacent Development Scale

The surrounding precincts provide important context for appropriate development scale. The Ramada Hotel site and Staffordshire Terrace precinct have similar land levels, with a gradual drop in elevation. Redevelopment of these areas is complicated by the presence of hundreds of strata owners. Nearby developments along Canberra Avenue and Wentworth Avenue are generally limited to 4–8 storeys, with Manuka and Parliament House precincts featuring buildings of 5–7 storeys. The apartment blocks at Northbourne Avenue reach 9–11 storeys, but these are located at major gateway points, unlike Hume Place, which is embedded in a residential and school precinct

## National Capital Authority Issues and Precedent

The most likely redevelopment sites are in the Railway Station and Fyshwick precincts, where there is a logical case for increased density. Northbourne Avenue, a recognised gateway to Canberra, has building heights of 9–11 storeys. There appears to be no precedent for 12–15 storey buildings at nationally significant suburban roundabouts such as Hume Place, which is not part of a town centre. Other prominent roundabouts near Parliament House, City Hill, ANZAC Parade, and Manuka Oval are surrounded by lower-rise developments.

Traffic and parking concerns, particularly around Fyshwick Markets and the Hume Place roundabout, require careful planning. The design of traffic lights and pedestrian crossings must prioritise safety for residents, school communities, and public transport users

## Logical Question

Given the established development parameters for significant entry roads to Canberra, the proposed departure to 8, 12, and 15 storey buildings at Hume Place is inconsistent with prior planning precedent and government thinking. The NCA's role is to *safeguard the national interest and Griffin's legacy, rather than prioritising commercial development objectives.*

## Relief Sought

In response to the concerns outlined in this submission, I respectfully request that the National Capital Authority consider the following actions to ensure that the planning process for Draft Amendment 102 (DA102) is transparent, inclusive, and consistent with Canberra's established planning legacy:

- **Pause the progression of DA102 in its current form**

Over 600 residents signed a petition within a single week requesting an extension to the DA102 submission deadline, demonstrating significant community concern and engagement, constrained within a week to collect signatures, undoubtedly would have yielded more if time allowed. This level of response indicates the need for additional time for review, community engagement, and the completion of essential planning studies before any final decisions are made and called on the Commonwealth Minister to amend the proposal by excluding established low-rise residential complexes and their immediate surrounds.

- **Address consultation deficiencies and restore community confidence**

The consultation period coincided with the January holiday, limiting participation from key groups such as the ACT National Trust. The extension to the submission period was not widely publicised, and some stakeholders were only recently informed. To ensure inclusivity, all key stakeholders should be notified of consultation opportunities, submission periods should be extended where necessary, and clear, accessible updates should be provided throughout the process.

- **Re-examine the proposed height framework against Canberra-wide precedent**

The proposed 8, 12, and 15 storey buildings at Hume Circle are inconsistent with established development patterns in comparable height precincts and important entry roads. For example, nearby developments along Canberra Avenue and Wentworth Avenue are generally limited to 4–8 storeys, and major gateway sites such as Northbourne Avenue reach 9–11 storeys. There is no precedent for 12–15 storey buildings at suburban roundabouts like Hume Place, which is embedded in a residential and school precinct.

- **Publish all outstanding technical studies prior to final decisions**

Essential planning studies—including solar modelling, traffic analysis, hazardous materials site testing, infrastructure capacity assessments, and environmental impact studies—should be completed and published before DA102 is finalised. Approving the amendment without these studies risks fixing critical development parameters without adequate feasibility or community protection.

- **Protect established low-rise residential precincts south of Canberra Avenue**

These areas should be excluded from high-rise development and provided with clear buffer zones to preserve their character and amenity. The surrounding context, including the Ramada Hotel site and Staffordshire Terrace, features lower-rise developments and complex strata ownership, further supporting the need for protection.

- **Explore alternative planning pathways**

Consider approaches that balance the need for additional housing with the preservation of community character, heritage, and liveability. This includes benchmarking building heights and densities against established Canberra precedents and ensuring that any densification is supported by appropriate amenities and genuine community engagement.

Submission by

**Joanna Elkington**

Staffordshire Terrace Resident

# Submission Regarding Draft Amendment 102

## Hume Circle Precinct

**Submitted by:** Mitchell Taylor  
Ngemba man and Canberra resident

I write as a Ngemba man and an owner-occupier in Staffordshire Terrace who understands that this city has always grown through deliberate and careful planning. Growth itself is not the concern. The concern is sequence, evidence and respect for the systems that allow a place to function well over time. Draft Amendment 102, in its current form, appears to move faster than its technical footing can comfortably support.

Across the material released to date, there are clear signs that key enabling work remains incomplete. Infrastructure capacity has not been transparently demonstrated. Precinct-scale solar and overshadow impacts have not been fully published. Transport modelling appears to sit behind the scale of uplift being contemplated. Where change of this magnitude is proposed in the national capital, the expectation is not simply ambition but disciplined proof.

Good planning listens carefully to Country, to infrastructure limits and to the lived reality of existing communities before it redraws the skyline. At present, Draft Amendment 102 does not yet show that this listening phase is complete. For that reason, and for the detailed matters set out below, the amendment should not proceed in its current form.

## Position

After detailed review, I do not consider Draft Amendment 102 ready to proceed. The amendment introduces substantial height uplift and expanded planning controls without first demonstrating that the necessary infrastructure, environmental safeguards, transport capacity and cultural engagement foundations are securely in place.

**Draft Amendment 102 should be rejected in its current form and returned for further technical work and proper sequencing.**

## Proposal pathway and process integrity

Material referenced within the broader NCA minute context indicates that the current planning pathway has been informed by earlier concept work associated with external development interests, including references to JEGA.

Where a planning framework emerges alongside proponent-led concept activity, the integrity and timing of statutory consultation become especially important.

Figure 6 of the NCA process material indicates that consideration of the proposal, including discussion with relevant stakeholders, precedes statutory consultation. Many directly affected residents were not engaged at that earlier stage.

This raises a legitimate procedural question as to whether affected residents were appropriately identified and consulted at the point contemplated by the NCA's own process framework.

Clarification of this sequencing would materially assist confidence in full compliance with section 15 of the Planning and Land Management Act 1988.

### **Infrastructure readiness**

The height permissions contemplated by Draft Amendment 102 imply a significant population uplift within a constrained Inner South location. However, the supporting material does not clearly demonstrate funded or staged upgrades to key servicing systems, including:

- trunk water and sewer capacity
- electricity distribution networks
- stormwater infrastructure
- local road network upgrades
- and social infrastructure provision

In established planning practice, density increases of this magnitude are normally accompanied by infrastructure sequencing that identifies timing, funding responsibility and delivery triggers.

Without that clarity, the amendment risks enabling growth that outpaces the physical systems required to support it.

### **Transport network performance**

Hume Circle currently operates as a complex multi-leg movement environment serving regional traffic, school peaks and local access.

The precinct is not presently supported by light rail and remains strongly car-dependent. High-frequency public transport coverage is limited relative to the scale of uplift contemplated.

In constrained networks such as this, relatively modest increases in dwelling yield can materially affect:

- queue length and delay
- intersection efficiency
- pedestrian safety
- and school pick-up congestion

The characterisation of the precinct as capable of absorbing substantial uplift is not yet convincingly supported by published modelling.

Before height envelopes of up to 15 storeys are confirmed, the Authority should release detailed intersection modelling, mode share assumptions and staged mitigation responses.

## **Solar access and energy performance**

A significant technical gap in the current material relates to solar access.

Preliminary shadow analysis reviewed within the community indicates that buildings at the upper end of the proposed height range could:

- place adjoining low-rise dwellings into shadow from mid-morning during winter
- leave a substantial proportion of affected apartments without direct winter sunlight and in some scenarios produce near-complete winter noon overshadowing

If confirmed, these outcomes would sit uneasily with long-standing ACT solar planning principles, including Rule R110 expectations, Clause 14.3 sunlight benchmarks and solar fence concepts.

The consequences are not abstract. Reduced winter solar access drives:

- increased heating demand
- reduced photovoltaic yield
- higher household energy costs
- and diminished passive thermal comfort

Draft Amendment 102 does not yet demonstrate how these impacts will be systematically avoided or mitigated. Given Canberra's strong policy emphasis on energy efficiency and climate responsiveness, this omission is material.

## **Urban canopy and heat resilience**

Staffordshire Terrace currently functions as a mature, well-treed residential environment contributing to local cooling and canopy continuity.

Intensification at the scale proposed introduces potential risks including:

- canopy loss
- increased hard surface ratios
- urban heat amplification
- and altered wind conditions at ground level

The amendment does not clearly provide baseline canopy mapping, projected retention targets or urban heat modelling.

Given the Territory's urban forest objectives, this level of environmental testing would ordinarily precede confirmation of height envelopes of this scale.

## **Localised planning impact**

The introduction of 15-storey permissibility adjacent to established 2–3 storey complexes creates immediate and foreseeable planning consequences.

Along McMillan Crescent, redevelopment would require consolidation of numerous strata owners, creating substantial legal and transactional complexity. The likely outcome is prolonged planning uncertainty without near-term redevelopment certainty.

This concentrates planning pressure on a small, stable residential enclave without demonstrated public benefit proportionate to the disruption imposed.

### **Designated Area expansion and gateway justification**

The Planning and Land Management Act permits designation of areas possessing special characteristics of the National Capital. In the material currently published, it remains unclear what specific national capital qualities within this established residential precinct justify the proposed expansion of Designated Area controls.

The gateway rationale advanced in Draft Amendment 102 warrants closer scrutiny. Historically, the Griffin vision for Canberra's approach corridors was inseparable from integrated national infrastructure, including the planned rail spine extending toward Jervis Bay and the wider regional network. Gateway treatment in that context was tied to major civic movement, not simply to the presence of developable land at a traffic intersection.

That strategic transport framework does not presently exist at Hume Circle. The precinct is not served by rail, is not functioning as a metropolitan interchange of national significance, and remains primarily a vehicular roundabout embedded within a residential and school catchment. In these circumstances, the planning logic for elevating the area to heightened Designated Area status requires much clearer demonstration.

Put plainly, the existence of apartment development potential does not, in itself, create national capital significance. Nor does height alone confer gateway status. Without the supporting civic, transport and symbolic infrastructure that historically underpinned Griffin's gateway thinking, the proposed escalation risks appearing disproportionate to the actual role and function of the place.

If the Authority maintains that a gateway condition is warranted, it should clearly articulate:

- the specific national capital values being expressed
- how those values are materially present at this location
- and how the proposed scale aligns with established Canberra precedent for nationally significant approach corridors

Until that case is made with greater precision, the justification for expanding Designated Area controls in this location remains unpersuasive.

### **Country, cultural respect and lived impact**

This precinct sits on Ngunnawal Country within a landscape that carries deep and continuing meaning. Planning decisions of this scale do not occur in a cultural vacuum. They land in lived places, with histories that are still present in the ground.

I became aware of the implications of Draft Amendment 102 through media reporting on 21 January. To learn of a proposal with the potential to reshape my home environment in this way, and to do so in the days immediately prior to the 26 January public holiday, was deeply confronting. For many Aboriginal people, that date carries an enduring association with dispossession and the loss of place. While I acknowledge that no offence may have been intended, the timing and communication pathway felt profoundly misaligned with the cultural sensitivity expected in National Capital planning.

I recognise that Draft Amendment 102 does not of itself trigger compulsory acquisition. That distinction is understood. The concern, however, is more structural and long-term. Introducing 12 to 15 storey permissibility on or immediately adjacent to stable low-rise complexes creates the conditions for progressive site aggregation, speculative pressure and the gradual picking off of individual owners by private developers over time. Planning history across Australian cities shows that this pathway, once enabled, is rarely theoretical.

Where that process unfolds, the shape of an existing community can be irreversibly altered well before any formal acquisition ever occurs. Residents who choose, or feel compelled, to leave in the face of sustained development pressure do not experience that outcome as neutral market movement. They experience it as the quiet unraveling of place.

For Aboriginal residents, the impact carries an additional layer. Connection to Country in an urban context is often grounded in continuity of place, daily presence and lived familiarity with landscape. Displacement, even indirect displacement, disrupts that continuity. Over time, those who leave are not only separated from their local community networks but from the specific country on which they have built contemporary cultural connections.

There is also a material dimension that warrants careful attention. Many owners within this precinct, including my own complex, hold an ACT Crown lease (ours extending to 2067). That tenure framework creates a reasonable community expectation of medium-term residential stability. The introduction of high-rise permissibility immediately adjacent to these holdings risks undermining that expectation and exposing owners to long-horizon market distortion.

In practical terms, residents who exit under sustained redevelopment pressure may do so at a point that does not reflect the full long-term appreciation potential of established Inner South housing in locations such as Kingston and Griffith. The financial effect is not hypothetical. It is a foreseeable market response to planning uncertainty.

For all of these reasons, early and meaningful engagement with First Nations stakeholders, and with the existing resident community more broadly, should be clearly visible in the evidence base for Draft Amendment 102. At present, it is not evident from the published material when such consultation occurred, who was engaged, or how cultural and community continuity considerations informed the proposed built form strategy.

Greater transparency in this area is necessary to restore confidence that the amendment has fully grappled with the human and cultural consequences that flow from the planning settings now proposed.

## **Conclusion**

Draft Amendment 102 raises substantive unresolved questions across infrastructure sequencing, transport capacity, solar performance, environmental impact and statutory process.

These matters go to the core of orderly planning in the national capital and should not be deferred to later development stages.

**I respectfully recommend that Draft Amendment 102 be rejected in its current form and returned for further technical work, full infrastructure sequencing and transparent community-grounded review.**

Canberra grows best when planning walks carefully with the land and the people who already call it home. This amendment is not there yet.

**Mitchell Taylor**

Ngemba man and Hume Circle resident

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 '21<sup>st</sup> 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.'

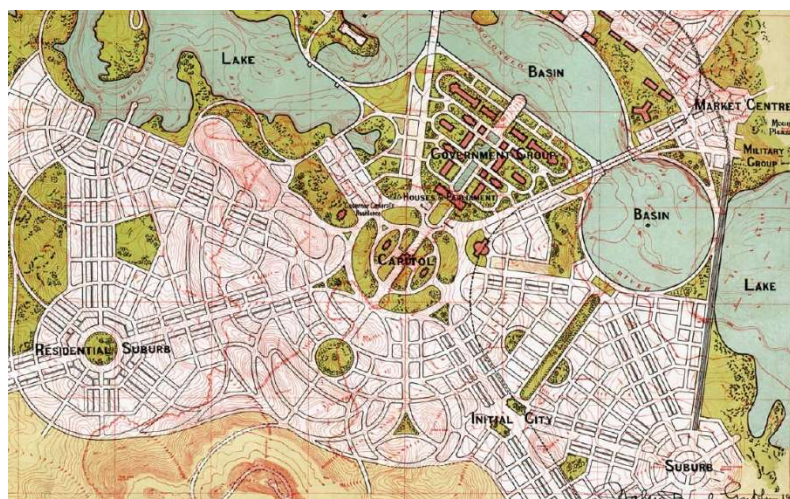


Figure 1. Walter Burley Griffin, 'Canberra, Federal Capital of Australia, Preliminary Plan,' October 1913 (detail). The rond point that is the subject of DA102 is clearly marked as 'Suburb' of the 'Initial City,' not 'Gateway.' Source: Reid, P. 2002, *Canberra following Griffin: a design history of Australia's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

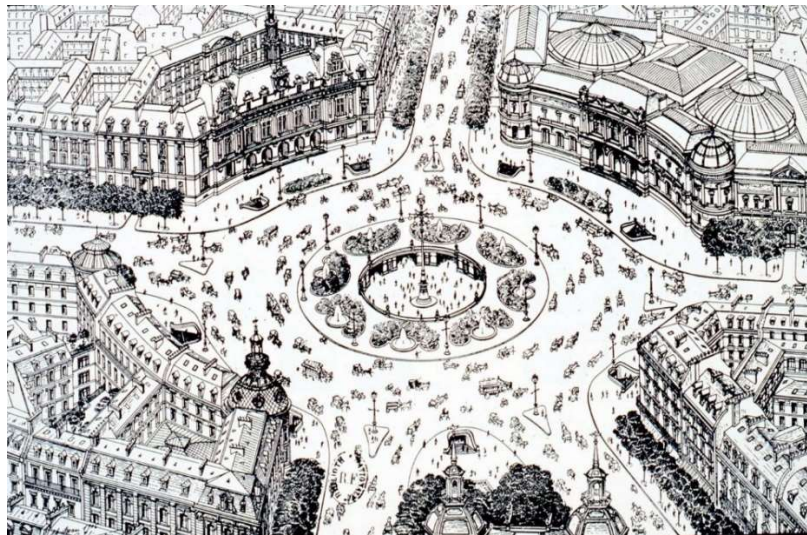


Figure 3. Eugène Hénard (1849–1923), ‘Carrefour à giratoire’ proposed for the intersection of Rue de Richelieu and Boulevard Haussman, Paris - a scheme featuring a sunken central plaza access by pedestrian subways under the traffic roundabout. Source: Hénard, *Études sur les transformations de Paris*,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

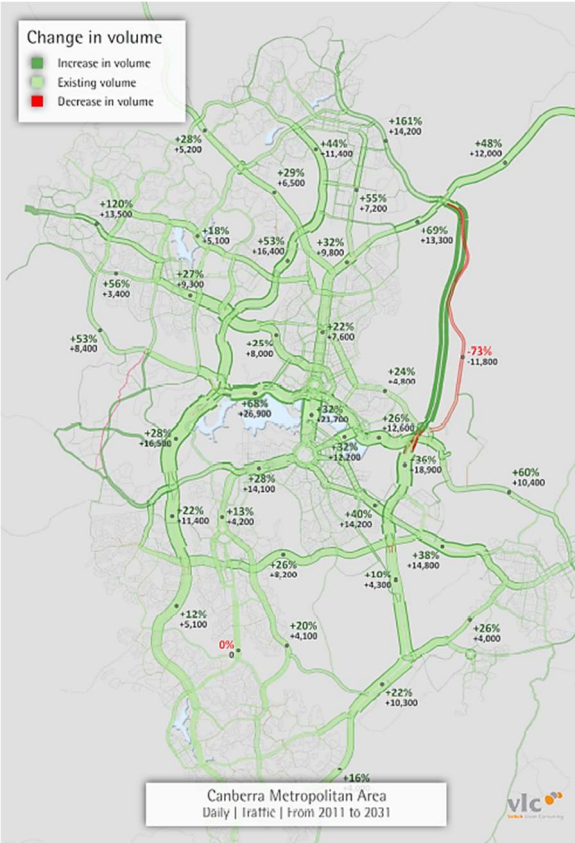


Figure 4. Predicted increase in weekday daily traffic, Canberra Metropolitan Area, 2011-2030 – note the 40% increase (+14,200 vehicle movements) on Canberra Avenue at Hume Circle. Source: Veitch Lister Consulting (2014), *Canberra Travel Modelling Report*, Prepared for Infrastructure Australia, The Consultants,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

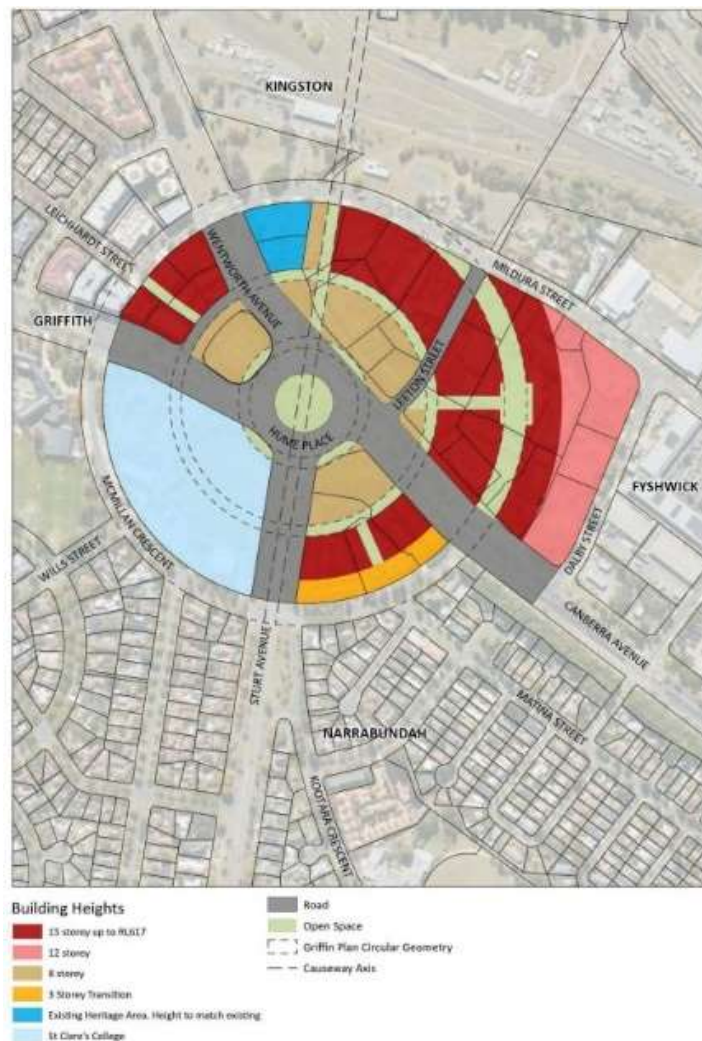


Figure 5. National Capital Authority, 'Hume Circle Precinct – Building Height Framework,' National Capital Plan Draft Amendment 102 – Hume Circle Precinct, the extent of physical design details in the document, a two-dimensional representation of building heights in generalised bands. Source: DA102,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

3.3 It does not achieve the 'integration of land use, transportation and urban form' identified as a '21<sup>st</sup> 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



**ALDI Stores**

(A Limited Partnership)  
ABN 90 196 565 019

10 Burando Road, Prestons, NSW 2170, AUSTRALIA

**PRESTONS REGION**

17 February 2026

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To Whom it May Concern,

**RE: DRAFT AMENDMENT 102 'HUME CIRCLE PRECINCT' – NATIONAL CAPITAL PLAN 1990**

ALDI Stores (ALDI) welcome the opportunity to provide a submission to the National Capital Authority (NCA) to express our upfront **support** for Draft Amendment 102 (Draft Amendment) to the *National Capital Plan 1990*, which seeks to facilitate the 'Hume Circle Precinct'. ALDI is encouraged by the intent of the NCA to create a vibrant mixed-use urban precinct that will attract activity and investment in the proposed Hume Circle Precinct area through the Draft Amendment. We welcome the expansion of appropriately zoned and suitably sized land able to support opportunities for grocery retailing as part of a mixed-use development. We are also supportive of the higher density and building heights, which are proposed under the Draft Amendment to create this new activity hub.

This submission provides an overview of ALDI's desire to expand in the ACT including being located in the proposed Hume Circle Precinct, details ALDI's operational requirements, and confirms in-principle support of the Draft Amendment.

**Context**

ALDI has long identified the potential of this precinct for the development of an ALDI Store to service the needs of the surrounding residential and employment catchments as well as visitors. We can confirm that there is a strong demand for the continued expansion of ALDI throughout the ACT and its various planned retail nodes and emerging centres. ALDI is capable of meeting this demand and contributing to the ACT's economic growth should circumstances and site availability provide for this. Recently in December 2025, CHOICE Consumer Advocacy Group named ALDI the most affordable grocery retailer in its government-funded supermarket basket comparison initiative, demonstrating the public welfare benefits of an ALDI Store including cost of living savings.

ALDI's market analysis and site selection process is rigorous and recognises the benefits of location in high activity hubs such as the new Hume Circle Precinct, which is well served by public transport and has good connectivity to the road network. The proposed Hume Circle Precinct has high visibility to a main approach road (Canberra Avenue), which would be an ideal location for an ALDI Store due to high visibility, good accessibility, proximity to existing and future residential and employment catchments, which would ensure that it is easily located by the community and visitors.

There are currently thirteen ALDI Stores in the ACT, with eleven of these located in the CZ1 Core Zone, one store (ALDI Wright) located within the CZ5 Mixed Use Zone, and another store (ALDI Chisholm) located in the CZ3 Services Zone.

**ALDI Operations**

ALDI is a grocery retailer offering high quality retail products to residents and workers in the ACT and has demonstrated the ability to reduce grocery prices and increase choice and competition in local markets. Each new ALDI Store contributes to the economic growth and viability of its centres by employing on average 20 people on an ongoing basis and supporting other employment within ALDI and indirectly through the company's supply chain. The development of a new ALDI Store creates around 25 construction jobs for the duration of the project.

The operational efficiency of ALDI relies on a standardised design that results in enhanced amenity and sustainable competition impacts on centres. Being able to build the standard ALDI Store format and associated supply chain efficiencies are key to ALDI's lower grocery prices. A typical ALDI Store generally requires 1,500m<sup>2</sup> of gross floor area, including a standard floor plate of retail floor space (1,000m<sup>2</sup>) and 'back-of-house' floor space (500m<sup>2</sup>), with a core range of 1,800 products.

ALDI Stores are managed in such a way that fewer articulated vehicle deliveries are required daily, typically 2-3 deliveries. These operational factors ensure that ALDI Stores are compatible with a range of adjacent and neighbouring land uses, including residential and mixed-use precincts. The delivery operation of vehicles owned and/or managed by ALDI demonstrate compatibility with a range of neighbouring land uses including residential and mixed use precincts due to the strict management of timing and frequency.

### **Support of Draft Amendment 102**

We understand that the Draft Amendment proposes the following relevant changes to establish the proposed Hume Circle Precinct:

- Identifies the proposed precinct as a Designated Area under the National Capital Plan.
- Prescribes new 'Land Use A' which involves a wide ranging mix of land uses including 'retail' which captures supermarkets.
- Prescribes high level provisions including objectives, land use provisions, and increased building heights.
- Requires detailed conditions of planning, design and development to be prepared as the next stage of planning for the proposed Hume Circle Precinct.

The release of more appropriately zoned land, which is of a suitable size to facilitate an ALDI Store under the Draft Amendment is supported and ALDI is excited about the opportunity to contribute to the proposed mixed-use Hume Circle Precinct. To this end, an ALDI Store makes a highly compatible component of a mixed-use development, which can positively contribute to the proposed activity hub, attract investment and enhance vibrancy. Retail activity including supermarkets play a significant role in generating 'critical mass' of activity and thereby making surrounding services and facilities viable and support the proposed precinct so it can thrive. In summary we confirm:

- Suitability of an ALDI Store as a ground floor tenant in a mixed-use development in a highly accessible precinct, which will activate the ground floor level and create visual interest, critical mass and vibrancy.
- Demonstrated compatibility to appropriately integrate with other development including business, office, and residential. The ALDI Store in Amaroo is a successful example of where an ALDI Store comprises the ground level tenant of a mixed use development, with three levels of residential apartments located above.
- Demonstrated positive employment outcomes associated with the establishment and operation of an ALDI Store, which satisfies the provision of local employment and business investment. It is in the public interest to attract consumers to a centre to promote investment, spending and provide activation and a strong sense of community.
- Fewer deliveries and shorter trading hours are a feature of ALDI Stores, which ensure operations respect the amenity of the immediate locality and this coupled with a small format floorplate ensures an ALDI Store does not affect the integrity of nearby centres.

### **Consideration for the Future Detailed Planning Conditions – Floor Space**

We understand that the next stage of planning will require the preparation of detailed conditions of planning, design and development for the proposed Hume Circle Precinct. We request that there is suitable flexibility in the future detailed conditions including any provisions for the retail gross floor area, to ensure that the proposed mixed-use precinct does not preclude an ALDI Store (1,500m<sup>2</sup> GFA) or limit retail diversity and so the new centre is able to appropriately serve the convenience retail needs of the existing and future residential and workforce populations. We have demonstrated that a small format ALDI Store would not affect the integrity of nearby centres because population growth and the new housing proposed for Hume Circle Precinct would demonstrate a genuine need for additional grocery retailing facilities.

The Territory Plan 2023 caps retail floor space at 1,500m<sup>2</sup> in the CZ5 Mixed Use Zone. ALDI is supportive of a similar approach in the proposed Hume Circle Precinct, as this would enhance retail diversity, enhance both choice and grocery competition whilst accommodating a wider mix of new businesses adjacent to existing and new services, housing and labour forces. This outcome is considered to directly support the proposed key activity hub for Hume Circle Precinct based on the area's recognised special characteristics and national significance.

**Conclusion**

In summary, ALDI supports Draft Amendment 102 which will deliver the renewal of an existing area and in doing so offer more sites that are appropriately zoned for retail uses in the proposed Hume Circle Precinct, including sites with larger floor plates suitable for grocery retailing which are appropriate for the establishment of a new ALDI Store.

In the next stage for determining detailed conditions of planning, design and development we request the NCA provide flexibility regarding the retail floor area in the new Hume Circle Precinct, to ensure there is no barrier for ALDI to deliver a new store, which would contribute to the vitality and economic viability of the precinct.

Thank you for the opportunity to comment on Draft Amendment 102 to the *National Capital Plan 1990*. We request that ALDI is kept informed of the progress of the Draft Amendment as a key stakeholder, and that we are advised of any future public exhibition periods including for the future detailed conditions of planning, design and development for the proposed Hume Circle Precinct.

Please do not hesitate to contact the undersigned should you require further clarification of this matter.

Yours Sincerely,

**ALDI Stores (A Limited Partnership)**

**Brendan Smith**

Director – Property

To the Chief Planner and Board of the National Capital Authority,

I write as a community member who I regularly uses the Hume Circle precinct for local travel, residential access and daily movement through the area.

I support thoughtful urban growth and recognise the need for additional housing in Canberra. Well-planned infill can strengthen the city when it is grounded in clear evidence, appropriate scale and genuine community engagement.

In its current form, Draft Amendment 102 raises several concerns that warrant careful reconsideration.

### **Sequencing of evidence and planning framework**

The amendment proposes building heights of up to 15 storeys within an established residential and school context. Based on the publicly available material, it is not yet clear that the full suite of supporting technical work has been completed and transparently shared. Key areas that would benefit from further demonstration include:

- detailed solar and overshadow analysis
- comprehensive traffic and intersection modelling
- social infrastructure capacity
- environmental and urban heat impacts

For a precinct-level change of this magnitude, publishing this evidence prior to finalising the planning settings would strengthen confidence in the proposal.

### **Built form and local context**

Hume Circle functions primarily as a major vehicular roundabout embedded within residential neighbourhoods and adjacent schools. It does not currently operate as a town centre or major metropolitan interchange.

The proposed 15-storey envelope appears high when compared with:

- Inner South development patterns along Canberra Avenue
- gateway treatments elsewhere in Canberra
- the predominantly low- to mid-rise character of the immediate surrounds

A more graduated, stepped height framework would appear more consistent with the existing urban context and Canberra's broader planning precedent.

### **Transport and movement pressures**

From a regular user perspective, the area already experiences significant peak-period congestion and complex traffic movements. Public transport coverage remains limited and there is no committed light rail infrastructure serving this location.

If substantial additional density is contemplated, clearer modelling of:

- mode share assumptions
- intersection capacity
- pedestrian and school safety measures

would materially assist in understanding how the precinct will function in practice.

### **Interface with established residential areas**

The proposed framework places substantial potential height immediately adjacent to existing low-rise residential complexes. This raises reasonable planning questions around:

- visual bulk and transition
- overshadowing
- privacy
- neighbourhood character

Good planning typically manages change through careful buffering and transition. Further refinement of the interface treatment would strengthen the amendment.

### **Consultation and community confidence**

Community feedback to date suggests that many residents and local stakeholders became aware of the proposal late in the process and that consultation timeframes were compressed.

Given the scale of change proposed, additional engagement and procedural transparency would assist in restoring confidence that affected communities have had a genuine opportunity to participate.

### **Constructive pathway forward**

There appears to be scope to support housing growth in this precinct while improving alignment with local context. Options that may warrant consideration include:

- a stepped height framework rather than a flat 15-storey envelope
- stronger buffering adjacent to established low-rise areas
- prioritising uplift in locations with fewer fragmentation constraints

- publication of the outstanding technical studies prior to finalisation

Thus, I respectfully request that the National Capital Authority:

- pause or revise Draft Amendment 102 pending further evidence
- review the proposed height regime against Canberra precedent and local context
- strengthen transition controls adjacent to established residential areas
- publish the outstanding technical investigations before progressing the amendment
- Remove existing low-rise residential communities.

Thank you for the opportunity to provide feedback.

## Submission to the National Capital Authority

Re: National Capital Plan Draft Amendment 102 – Hume Circle Precinct

Submission by the Executive Committee of the Axiom Owners Corporation, on behalf of the residents and owners of 111 Canberra Avenue ('Axiom' Apartments), Griffith

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### 1. Introduction and Standing

This submission is presented by the Executive Committee (EC) of the **Axiom Apartments**. It responds to **Draft Amendment 102 – Hume Circle Precinct** and the associated Background Paper.

The Executive Committee make this submission on behalf of the residents and owners of Axiom (the Axiom Community), located on the land identified in Draft Amendment 102 as lying on McMillan Crescent between Canberra Avenue and Leichhardt Street. Axiom is an established residential building whose residents have made long-term financial and personal commitments to living in this part of Canberra's Inner South.

In preparing this submission, the Executive Committee:

- engaged in discussion of Draft Amendment 102 with owners and residents via the Axiom residents' WhatsApp groups and direct correspondence
- received significant interest, concern and feedback regarding the implications of the Draft Amendment
- consolidated feedback into this single coordinated submission
- shared the draft submission with the Axiom Community for final feedback before finalising.

We, the residents and owners of Axiom, support well-designed, medium-density urban renewal in appropriate Inner South locations that maintain the amenity and character of neighbourhoods. However, Draft Amendment 102 in its current form raises significant concerns to the Axiom Community regarding both the status of our building and the impact of the proposed changes on the character and liveability of our neighbourhood.

We acknowledge the role of the National Capital Authority (NCA) under the *Australian Capital Territory (Planning and Land Management) Act 1988* and the obligation to respect the national significance of Canberra, including the geometry and intent of the Griffin Plan. We also recognise the need for additional housing supply.

However, **we submit that Draft Amendment 102, in its current form, gives disproportionate weight to density targets while insufficiently protecting existing communities, neighbourhood liveability, and the authentic intent of the Griffin legacy.**

Accordingly, we object to the Draft Amendment as proposed and request substantial revision.

We propose a **viable alternative**: medium-density redevelopment only (generally 6–8 storeys) in sections of the Hume Circle area that do not disrupt existing apartment complexes or other key community infrastructure; protection of existing residential buildings (and their amenity) that lie within and adjacent to the McMillan Crescent geometry; landscape-led interpretation of Griffin Plan geometry (where practical, and mindful of the development and evolution of the city since the Griffin Plan was created); and reinforcement not disruption of existing local centres of commerce Manuka and Kingston (including their historical significance to Canberra).

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## 2. National Capital Plan Framework in the context of responding to Draft Amendment 102

Beyond presenting the concerns of the Axiom Community to Draft Amendment 102, we have also considered how the draft amendment relates to and is consistent with the National Capital Plan. The National Capital Plan establishes principles for planning and development within the areas it covers. Among the most relevant principles for considering the appropriateness of what is proposed in Draft Amendment 102 are the principles of:

- **Landscape dominance over built form**
- **A hierarchy of town centres**
- **Generally low building heights**, with buildings in Canberra Central typically not exceeding the mature tree canopy (approximately 3–4 storeys), except where explicitly justified
- **Respect for the geometry *and intent* of the Griffin Plan**, including its human scale, garden-city character and separation of centres.

While the National Capital Plan allows limited departures from these norms in exceptional locations, such departures are intended to be carefully constrained, clearly justified, and consistent with the overall structure of the city. It is our considered view that Draft Amendment 102 does not do this. Instead it presents changes that are disproportionate and out of balance with the surrounding areas, inconsistent with the spirit of the Griffin Plan, and would deliver an abrupt and jarring transition into and out of the Eastern gateway.

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## 3. Requisition Risk and Security of Existing Homes

Axiom is located on land identified in Draft Amendment 102 as lying on **McMillan Crescent between Canberra Avenue and Leichhardt Street**.

A primary concern for the Axiom community is the stated planning intent to “complete” McMillan Crescent now or in the future, including through land currently occupied by existing buildings, with Draft Amendment 102 leaving the future of Axiom uncertain by stating the “‘Griffin Plan’ circular geometry’ shown in Figures 146 and 147 are illustrative only, *of the future potential to complete the circular geometry within the Hume Circle Precinct*” [emphasis added].

While Draft Amendment 102 characterises the completion of McMillan Crescent as illustrative or long-term, the designation of the Hume Circle Precinct as a Designated Area, coupled with explicit objectives to complete the circle, creates a **credible future risk of land acquisition or compulsory resumption** and that existing residential buildings within the circular geometry may be subject to:

- Compulsory acquisition;
- Pressure to redevelop;
- Or long-term planning blight.

This creates unacceptable uncertainty for existing residents and owners not just at Axiom, but at the apartment complexes currently within the red highlighted sections of Figure 147 in Draft Amendment 102 between Wentworth and Canberra Avenues, undermining:

- Property security, property values and long-term tenure;
- Mortgage and financing confidence;
- The reasonable expectation that approved residential developments will not later be rendered expendable by subsequent planning reinterpretations.

Relevant excerpts from Draft Amendment 102:

*Section 1.2 Designated Areas*

“ ...and including land around Hume Circle”

*4.19.3 Objectives for the Hume Circle Precinct*

“2. Restore and emphasise the Griffins’ vision by:

- extending McMillan Crescent to complete this circle ”

*4.19.5 Detailed conditions of planning, design and development*

“The circles identified as the ‘Griffin Plan circular geometry’ shown in Figures 146 and 147 are illustrative only, of the future potential to complete the circular geometry within the Hume Circle Precinct.”

**We submit that no planning amendment should proceed where it leaves existing residential buildings under an implied future threat of removal.**

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#### **4. Lack of Transport or Urban Logic in Completing McMillan Crescent (now or in the future)**

We further submit that completing McMillan Crescent at the Axiom site would serve **no demonstrated transport, access, logistics, or urban-function purpose.**

- The local road network already provides efficient vehicular circulation
- There is no evidence that extending McMillan Crescent at this location would relieve congestion or improve traffic flow on Canberra Avenue, Wentworth Avenue, or surrounding streets
- It would not improve public transport outcomes
- It would further subject the current Leichhardt Street to through-traffic, further disrupting a street utilised primarily by local residents, including many young families.

In practical terms, completing McMillan Crescent at this location would function primarily as a **symbolic gesture rather than functional**, not as necessary infrastructure. Symbolic geometry is not sufficient justification to disrupt an established residential community.

While we note that Draft Amendment 102 seems to exclude Axiom from the zoning and other changes proposed *at this stage*, we observe that the text at 4.19.5 quoted above states the ‘Griffin Plan circular geometry’ is purposefully included within the figures presented in Draft Amendment 102 to be illustrative of the “future potential to complete the circular geometry within the Hume Circle Precinct”, regardless of logistical benefits or impacts on established communities.

It is also not clear in the draft amendment that the various illustrative figures constitute a hard boundary to the Designated Area and are to be used when interpreting and applying the text of the amendments, or whether the figures are just generally illustrative. Some of the figures also leave it ambiguous as to whether the land currently occupied by Axiom is to be included in the designation or not and the text changes make this no clearer.

**The Draft Amendment should explicitly and unambiguously exclude 111 Canberra Avenue (Axiom) from any future road, open-space, or geometry-completion works.**

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## 5. Excessive Height and Density: Incompatible with Inner South Character

Draft Amendment 102 permits **building heights up to RL 617 (15 storeys not including rooftop plant)** around the Hume Circle, including in the areas bound by Canberra and Wentworth Avenues and Leichhardt and Hely Street.

We submit that:

- This scale is **grossly out of character** with the immediately surrounding areas of Griffith, Kingston, Narrabundah and parts of Fyshwick to Hume Circle
- It **exceeds what is necessary** to achieve genuine medium-density urban renewal in the Inner South
- It would significantly **increase congestion** and infrastructure strain on a set of roads already struggling to feed vehicles into and out of Central Canberra and over the lake
- It effectively transforms Hume Circle Precinct into a **de facto town centre**, contrary to Canberra's long-standing hierarchy of town centres
- Such a crowding of tall towers **would not be conducive to supporting the Griffin Plan's** vision of an aesthetic and welcoming Eastern gateway for people entering central Canberra from the East, instead presenting a forbidding collection of towers surrounding this key vehicle entry point
- It would **disrupt the core visual axes of central Canberra** as a scenic national capital (including the vista from Mount Ainslie looking towards Parliament House) by having a disproportionate agglomeration perched to the East of the Parliamentary Triangle drawing the viewers' attention.

The National Capital Plan consistently emphasises:

- A hierarchy of town centres
- The avoidance of uncontrolled urban nodes
- Building heights generally at or below the mature tree canopy, except in clearly defined, exceptional locations
- Taller buildings are permissible only where explicitly justified and carefully sited.

Currently RL617 height buildings only appear in the Civic, Belconnen, Woden and Tuggeranong town centres. Applying RL617 residential towers across much of Hume Circle effectively treats this area as a new high-density locale and default town centre, rather than as a landscape-led gateway or transitional precinct. A phalanx of 15 story buildings surrounding Hume Circle would be forbidding, feel overwhelming and not be a welcoming presence for travellers approaching and entering the Eastern Gateway, and a likely eyesore.

We support thoughtful medium density around Hume Circle. **Hume Circle is not, and should not become, another Woden or Belconnen.**

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## 6. Amenity, Overshadowing and Microclimate Impacts

The construction of RL617 height buildings between Canberra, Wentworth, Leichhardt and Hely would **create overshadowing and solar access issues** for Axiom (and other buildings along and around Leichhardt Street), significantly impacting our existing amenity and outlook. It would also likely impact Saint Clare's as well with shadows crossing Canberra Avenue.

We are concerned that buildings of the scale proposed will result in:

- significant overshadowing of public spaces and neighbouring residential areas
- adverse wind and downdraft conditions along Canberra Avenue and within the precinct
- loss of winter solar access.

Under the proposed zoning a building sharing the current boundary with Axiom and standing only a few metres away would be allowed to be up to 15 storeys (not including plant). These are not minor effects; they would change the character and comfort of the gateway and nearby homes. These outcomes are inconsistent with the National Capital Plan's emphasis on human-scaled, landscape-integrated urban form.

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## 7. Misappropriation of the Griffin Legacy

We strongly object to what we regard as a **selective and instrumental use of the Griffin Plan** to justify outcomes that are inconsistent with its spirit. The draft amendment seeks on one hand to support urban renewal "in a manner consistent with the Griffins' Plan for Canberra" while on the other to simultaneously "improve housing supply supporting the national agenda", even where these two goals are inconsistent with each other.

While the Griffin Plan employed geometry and axial thinking, it was equally defined by:

- human scale
- landscape primacy
- separation of centres
- a city experienced through movement, vistas, and greenery rather than vertical enclosure.

Griffin is regularly invoked in a way to imply that very tall, high-density residential towers is consistent with the Griffin Plan vision and intent. Draft Amendment 102 predominately frames the proposed amendments in terms of the Griffin Plan, but has freighted in housing supply targets drawn from the National Planning Reform Blueprint and National Urban Policy. While Draft Amendment 102 and its associated background paper do openly name the sources of the housing targets and also state "This proposed Amendment supports the national policy agenda [for housing]", it creates a muddled Frankenstein vision for the Hume Circle Precinct that is neither fish nor fowl.

The proposed built form that is described by Draft Amendment 102 bears little resemblance to Griffin's 'city beautiful' or 'garden city' ideals and instead **reflects density imperatives imposed in an inappropriate manner upon a significant area**. Nor does it meet the National Capital Plan's own stated density and amenity aspirations.

The ACT Government's East Lake Plan, which passes through part of the proposed Hume Circle Precinct, states that "New residential development will be of a height and density appropriate to neighbourhood characteristics and amenities". It also states that, "A modest height could define the

avenues, the central transport hub and open spaces at its edges”, and, “Height of buildings is 18m along Canberra Avenue and Hume Circle” (i.e. about 6-7 storeys), suggesting **the ACT Government does not share the National Capital Authority’s view that buildings of up to 15 storeys (not including plant) surrounding Hume Circle would be appropriate or balanced.**

Again, **we support thoughtful medium density residential development around Hume Circle**, which would still contribute significantly to achieving national housing targets. **We do not support high density towers around Hume Circle.**

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## **8. Impacts on Manuka and Kingston Centres of New ‘Mixed Use’ Developments at Hume Circle**

The scale and ambition of the proposed Hume Circle precinct risks diverting retail, hospitality and community activity from Manuka and Kingston, undermining their role as established Inner South centres.

By allowing extensive mixed uses and a concentration of activity at Hume Circle, Draft Amendment 102 would **create a new commercial centre (or series of mini-centres) in direct competition with Manuka, Kingston and the Kingston Foreshore.** This would likely result in failed ventures and empty commercial spaces, which in turn further dilutes the viability of the existing centres, with reduced overall vibrancy across all competing locations and a derelict aspect being the result. It has been proven that the residential populations of new mixed-use buildings never supply the demand for the stores that optimistically set up shop beneath them.

We note that Manuka, Kingston, the Kingston Foreshore and Kingsborough all have empty storefronts and are regularly struggling to maintain their vibrancy and attractiveness to both customers and businesses. We further note that many of the new mixed-use buildings along Northbourne Avenue that include commercial space at street level in residential apartment blocks have not been successful even years after their establishment due to competition with Braddon, Dickson and O’Connor shopping areas.

A limited number of dentists, accountants, Pilates studios and similar small businesses exist in Canberra to utilise these kinds of dispersed commercial locations in residential neighbourhoods. Restaurants and cafes nearly never work in Canberra in these locations, as experience across a multitude of similarly presented new mixed-use buildings between 2000 and 2025 has shown. **Mixed-use buildings in the wrong location end up with an odd mix of businesses or empty shopfronts, and often have a strange, doleful character.** Rather than introducing commercial space underneath residential buildings in residential areas, the only regularly successful model has been to introduce apartments above existing commercial streets. But even many of the shop spaces underneath the new apartment buildings in the busy Braddon shopping, dining and recreation precinct remain empty.

We are concerned that the scale and mixed-use ambition of the Hume Circle Precinct would:

- Divert retail, hospitality and community activity from **Manuka and Kingston** (and possibly the Fyshwick Markets)
- Weaken the viability of these long-established centres
- Create an oversupply of commercial and retail floor space in close proximity around the East Lake area
- Fragment social, community and commercial activity rather than consolidating it

- Produce unattractive empty ‘shops’ at the base of buildings, and open spaces not used by residents because they have been framed as commercial.

This outcome would be inconsistent with the National Capital Plan’s principle of **supporting, not fragmenting, established centres**.

A balanced renewal strategy should reinforce Manuka and Kingston, not compete with them.

---

## 9. Appropriate Redevelopment of Industrial Land Adjacent to Hume Circle

We acknowledge that there is merit in redeveloping under-utilised industrial land, including:

- The Canberra Milk (Australian Co-operative Foods) site at 2 Mildura Street;
- The Power Kart Raceway site on Canberra Avenue.

However, we submit that:

- Redevelopment should be **medium density**, not high-density towers incommensurable with the existing character of the area
- Building heights should be capped at **6–8 storeys** to support the consistent character and amenity of the existing nearby developments
- Mixed-use (i.e. incorporating ground level commercial use within new residential buildings) should be rejected
- Transitions to surrounding residential areas must be carefully managed
- Landscape and open-space outcomes must be prioritised over yield.

This approach would **deliver additional housing without sacrificing liveability or character**. It would also provide a larger local population to frequent the existing commercial centres of Manuka, Kingston and the Foreshore.

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## 10. A Viable Alternative for Hume Circle

We are not opposed to redevelopment or increased housing supply. We propose a **balanced alternative** that better aligns with the National Capital Plan:

- **Medium-density redevelopment** generally limited to **6–8 storeys**, including on former industrial sites such as Canberra Milk and the Power Kart Raceway
- **Explicit protection of existing residential buildings**, including Axiom, from requisition or displacement
- **Landscape-led interpretation of Griffin geometry**, using open space, planting, vistas and pedestrian links rather than tower-led symbolism
- **Reinforcement of Manuka and Kingston** as primary Inner South centres
- **Careful transition in scale** to surrounding residential areas
- **Demonstrable improvements** to liveability, amenity and public space (sunlight, wind comfort, tree canopy, microclimate).

This approach would deliver additional housing while preserving character, trust and quality of life.

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## 10. Requested Changes

We the Axiom Community respectfully request that the NCA:

1. Explicitly exclude 111 Canberra Avenue (Axiom) from any future McMillan Crescent completion or land acquisition
2. Remove any requirement or presumption to complete McMillan Crescent through existing residential land
3. Reduce maximum building heights across the precinct, with an upper limit of 6–8 storeys
4. Reaffirm the primacy of Manuka and Kingston as established centres
5. Align redevelopment outcomes with the spirit, not merely the rhetoric, of the Griffin Plan
6. Re-exhibit a revised Draft Amendment reflecting these changes.

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## 11. Conclusion

The residents and owners of Axiom support thoughtful, well-scaled urban renewal. We do not support planning outcomes that place existing homes at risk, impose excessive density, diminish the liveability of existing neighbourhoods, or erode the National Capital Plan's core principles.

We urge the National Capital Authority to substantially revise Draft Amendment 102 to achieve a balanced, durable and genuinely Canberra-appropriate outcome for Hume Circle and surrounds and Canberra as a whole.

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*Submitted in good faith by the Executive Committee of the Axiom Owners Corporation, on behalf of the owners and residents of 111 Canberra Avenue (Axiom Apartments).*

*17 February 2026*

# S

# A

30 January 2026

The Chief Planner  
Mr Andrew Smith  
National Capital Authority

By email [draft.amendment@nca.gov.au](mailto:draft.amendment@nca.gov.au)

**Draft Amendment 102 – Hume Circle Precinct  
Submission on Behalf of Roundhouse Hotels**

Dear Mr Smith

We are pleased to provide a submission in response to Draft Amendment 102 of the National Capital Plan on behalf of Roundhouse Hotels, the lessee of Block 1 Section 87 Griffith which is currently occupied by the Ramada Diplomat Hotel.

Stewart Architecture were engaged by Roundhouse Hotels in 2024 to investigate possible redevelopment outcomes for their site which forms a prominent part of the Hume Circle Precinct urban renewal area as identified in Draft Amendment 102.

We support the inclusion of the Hume Circle Precinct as a Designated Area to be overseen by the NCA to reinstate the Griffins' strong symbolic design for Central Canberra, ensuring development is consistent with the geometry and intent of the Griffins' plan for Canberra.

Furthermore, we support the intent of Draft Amendment 102 to improve urban density, land use and public domain surrounding Hume Circle – creating a distinctive sense of arrival and a symbolic gateway experience on the Canberra Avenue approach route into the National Capital.

Carefully considered density in locations such as Hume Circle will allow residential development which addresses the need for improved housing supply near transport and services. This supports National Cabinet's target to improve housing supply in appropriate locations. The design quality of resultant development proposals will be ensured through the National Capital Design Review Panel process.

We support the provision of 'Land Use A' allowing commercial accommodation, retail and residential amongst other uses.

For Block 1 Section 87 Griffith our client envisages high density redevelopment which provides larger apartments appealing to inner south demand, possibly in the form of vertical retirement living. Additionally, it is envisaged the redevelopment may maintain the tradition of hotel accommodation on part of the site. The development will contribute to Hume Circle becoming a prominent and vibrant mixed-use precinct. We are committed to design excellence and sustainability in the design and delivery of architecture, landscape and public realm.

## **Suggested Modification to Draft Amendment 102**

Block 1 Section 87 Griffith sits within the 'inner circle' of the Hume Circle Precinct.

We acknowledge the general height strategy of the inner circle built to 8 storeys allowing 'buildings within a landscape' to define the inner gateway experience. Buildings to the outer circle are then permitted to RL617.

Draft Amendment 102 suggests land to the north-west of Block 1 Section 87 permits development to RL617. All the identified sites have been redeveloped in recent years – to heights only ranging between four and eight storeys. Because the majority of these sites are now strata residential it is highly unlikely that further increase to height will ever occur, thereby limiting the potential to realise appropriate development density in this part of Hume Circle.

Block 1 Section 87 provides opportunity to achieve both the desired built form and urban density envisaged for the Hume Circle Precinct if heights on part of the site are increased in accordance with our design studies. Our studies propose built form consisting of underground parking (no podium) and two tower elements up to RL617 with separation to frame the vista along Canberra Avenue to the Parliament House flagpole. The built form steps down to 8 storeys at the Hume Place frontage to maintain the scale of the inner gateway experience.

Taller building on Block 1 Section 87 will not have adverse impact on surrounding sites. Our winter shadow analysis confirms minimal if any impact to adjacent sites. There is no overshadowing of the St Clare's College oval.

Importantly our proposal does not diminish the primary radial and circular structuring geometry of the Hume Circle Precinct, and the framing of the vista to Parliament House will enhance the sense of arrival and symbolic gateway experience.

We request the NCA's consideration of our proposed changes to Draft Amendment 102. We would welcome the opportunity to meet with the NCA and present our proposal.

Yours sincerely,

Marcus Graham  
Practice Principal

# StewartArchitecture

Block 1, Section 87, Griffith  
Concept Design

Canberra Studio  
10/285 Canberra Avenue  
Fyshwick ACT 2609  
+61 2 6228 1200

Sydney Studio  
2/233-235 Bulwara Road  
Ultimo NSW 2007  
+61 2 9061 4760

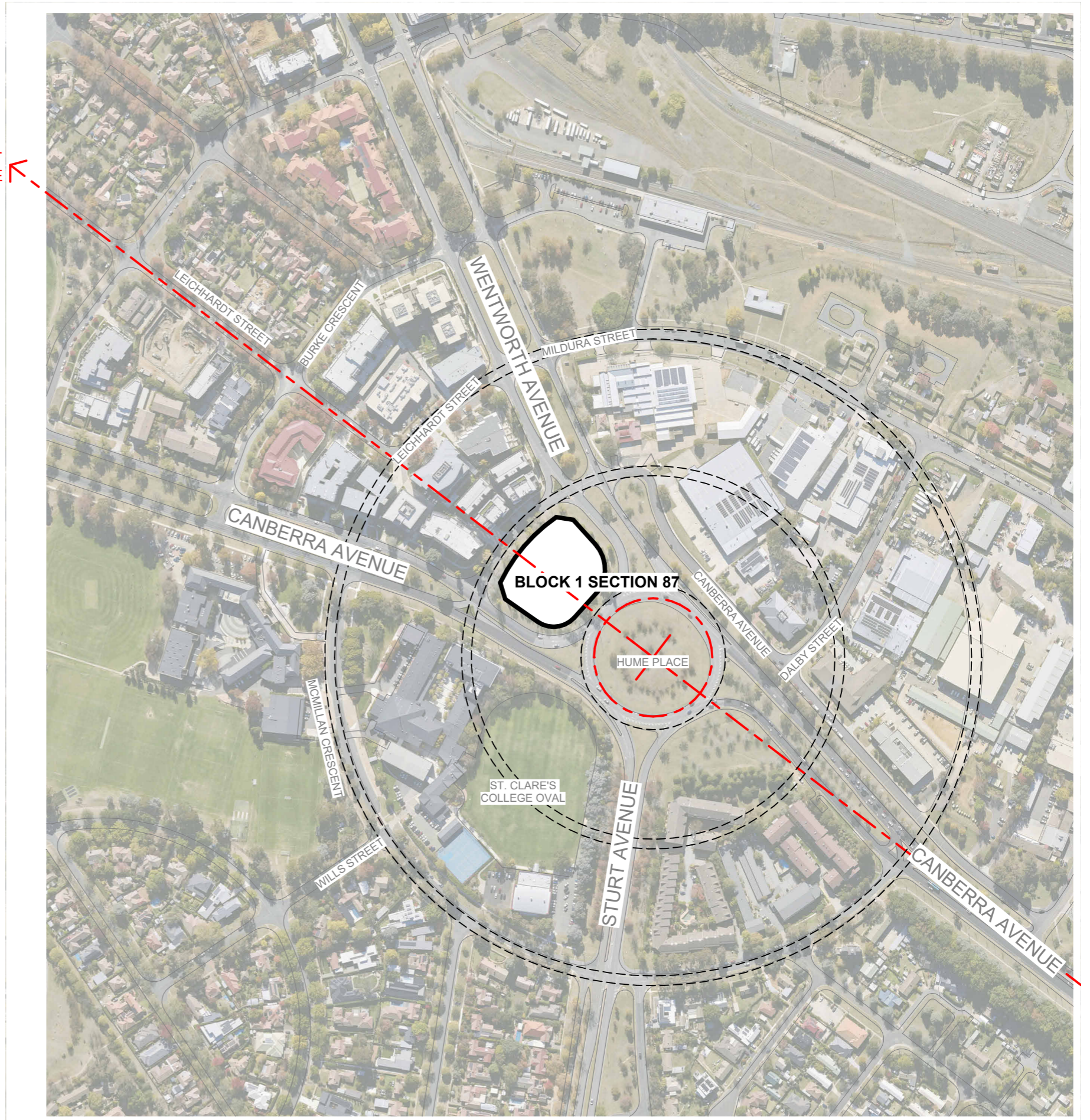
[office@stewartarchitecture.com.au](mailto:office@stewartarchitecture.com.au)  
[www.stewartarchitecture.com.au](http://www.stewartarchitecture.com.au)

# LOCATION PLAN

## BLOCK 1 SECTION 87 GRIFFITH

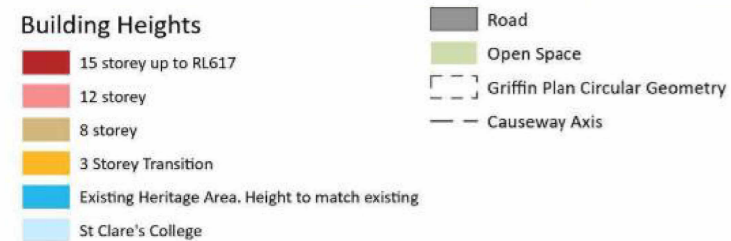
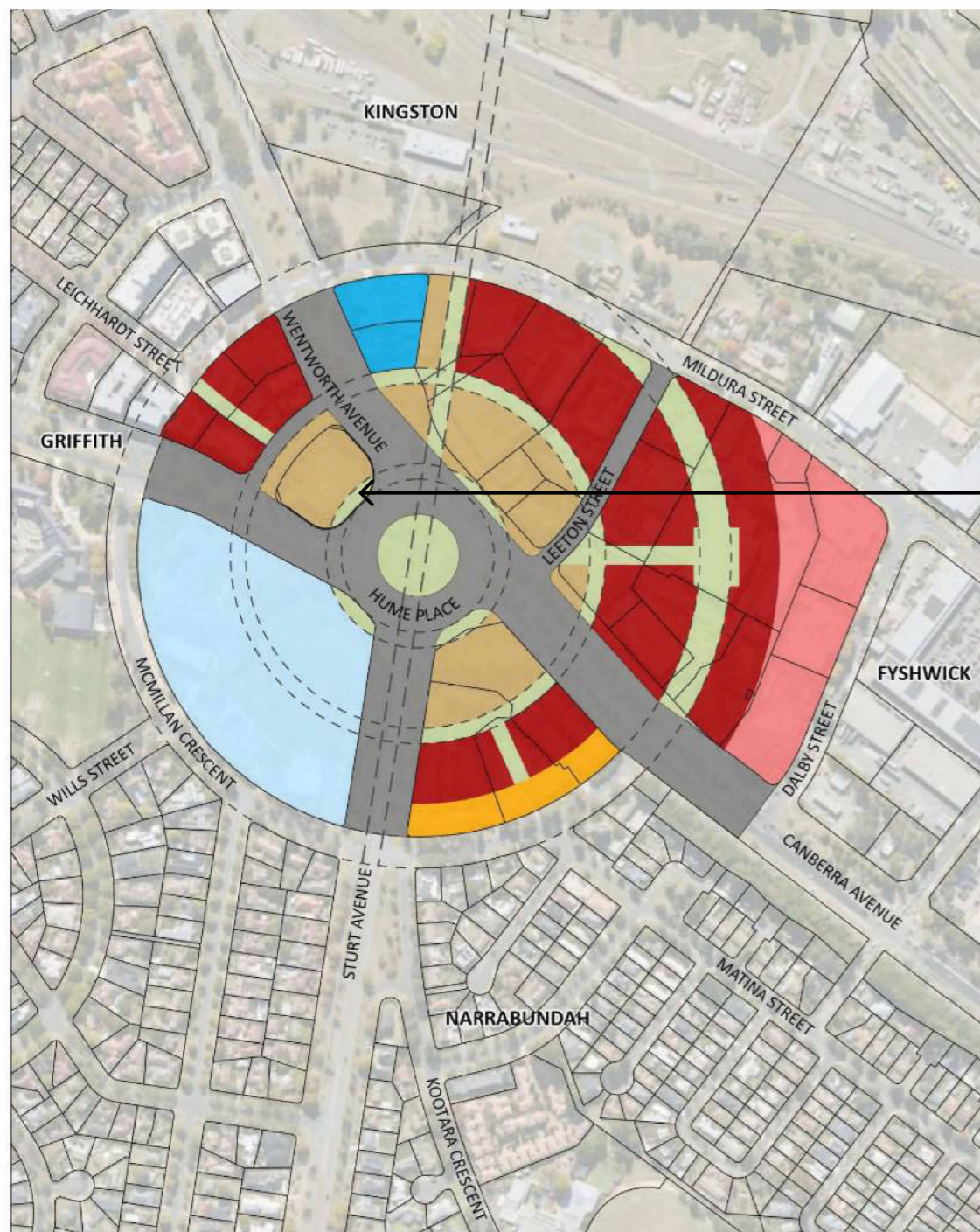
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SK2	NCA DRAFT AMENDMENT	A
SK3	3D MASSING	A
SK4	3D MASSING	A
SK5	3D MASSING	A
SK6	SECTION	A
SK7	SHADOW DIAGRAM - WINTER SOLSTICE	A
SK8	SHADOW DIAGRAM - EQUINOX	A
SK9	SHADOW DIAGRAM - SUMMER SOLSTICE	A

TO PARLIAMENT  
HOUSE FLAGPOLE



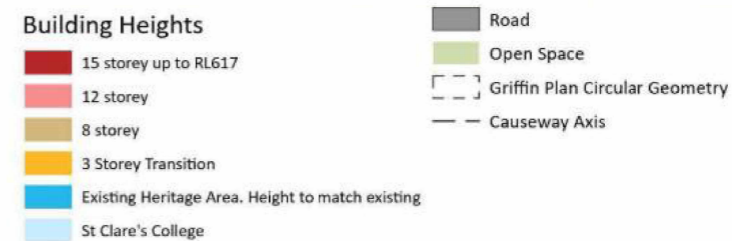
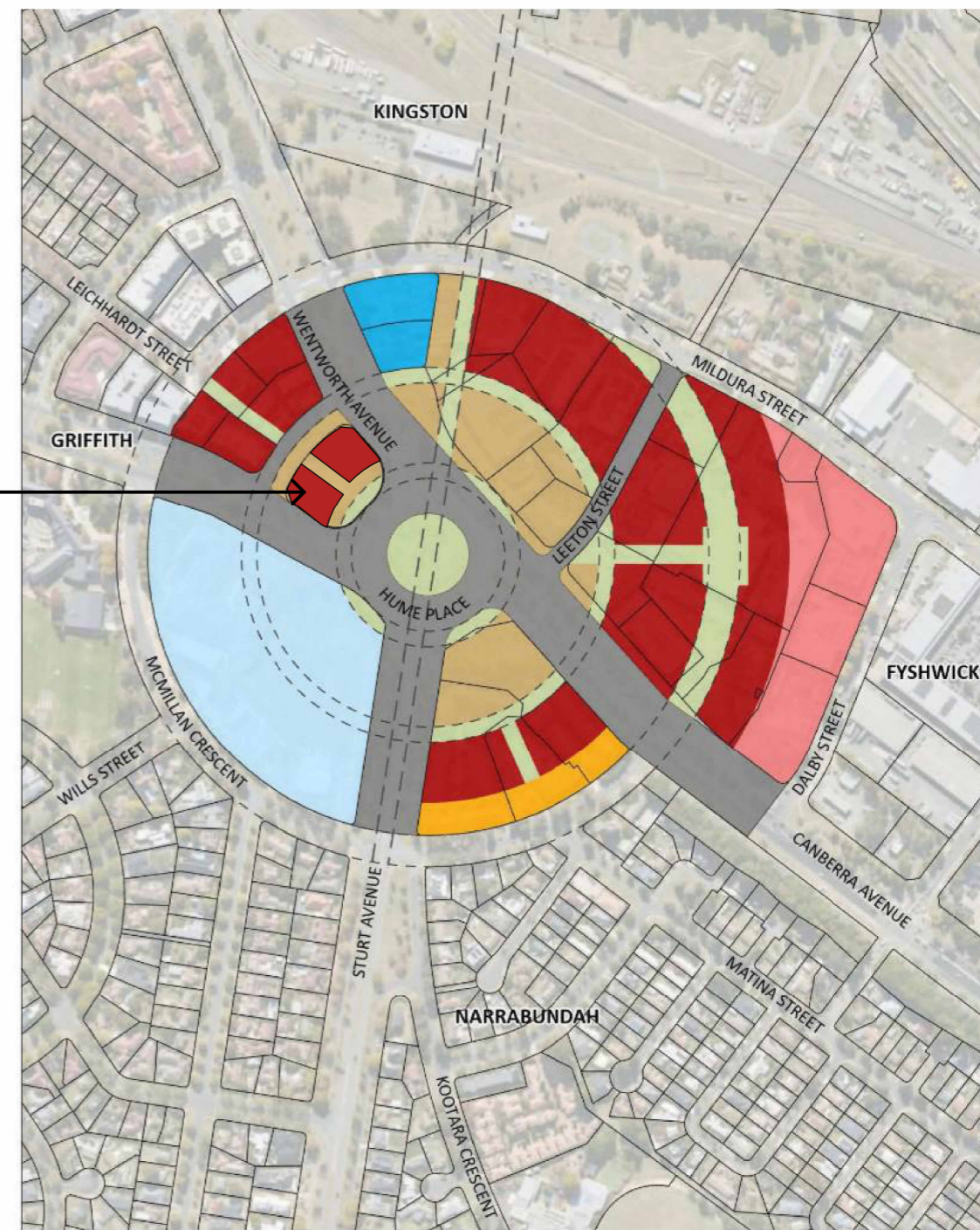
# NCA DRAFT AMENDMENT

BLOCK 1 SECTION 87 GRIFFITH



**NCA DRAFT AMENDMENT 102**

BLOCK 1  
SECTION 87

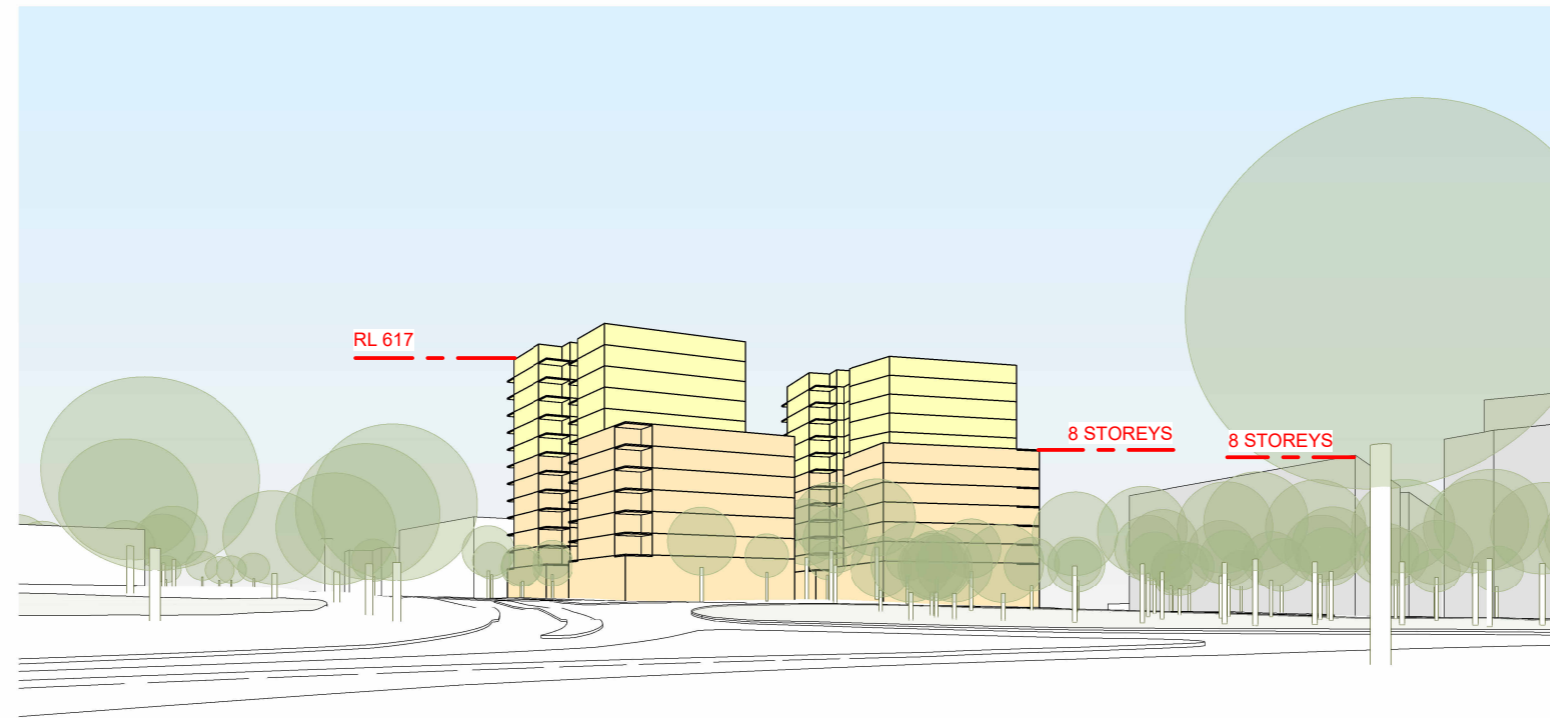


**PROPOSED CHANGES TO AMENDMENT 102**

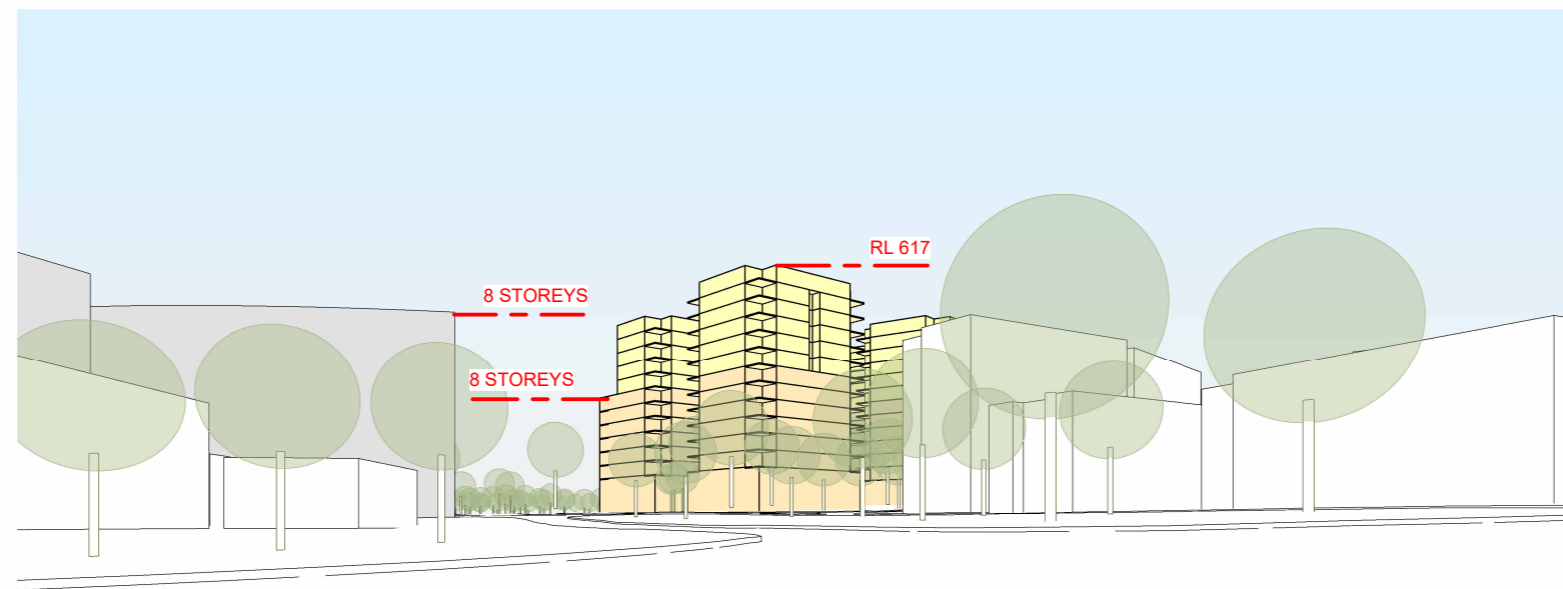


# 3D MASSING

BLOCK 1 SECTION 87 GRIFFITH



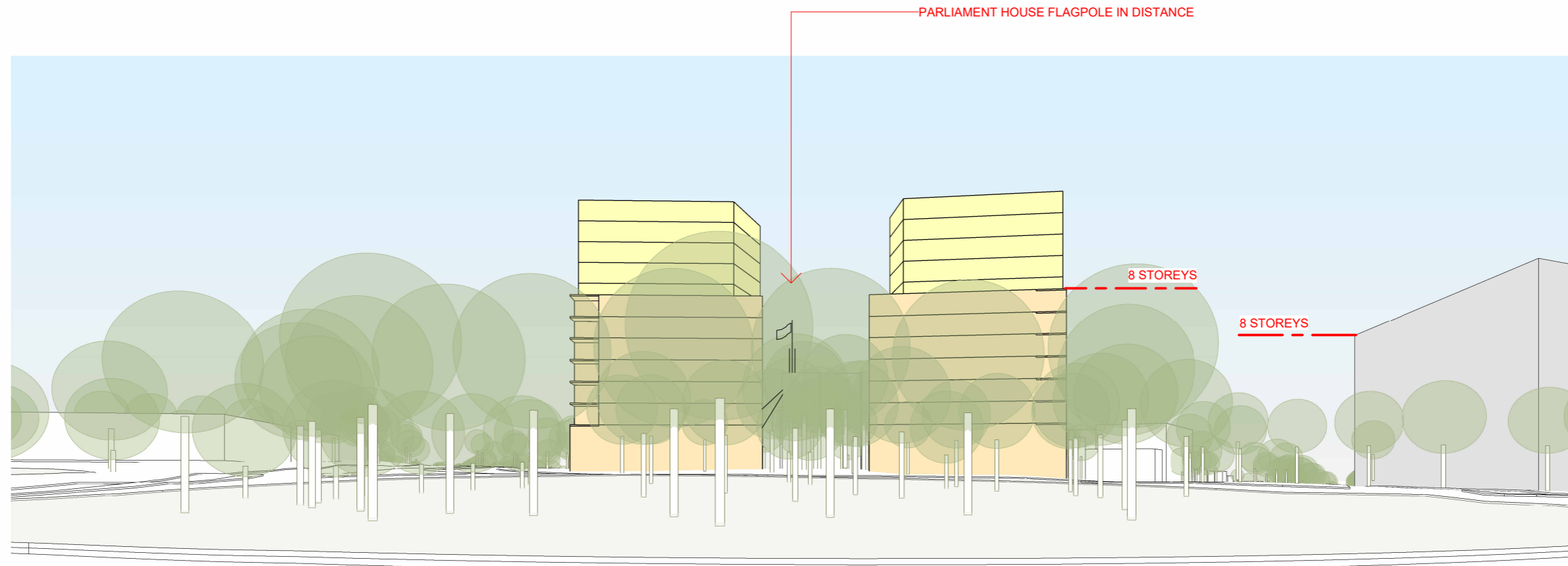
1 PERSPECTIVE FROM STURT AVENUE



2 PERSPECTIVE FROM WENTWORTH AVENUE

# 3D MASSING

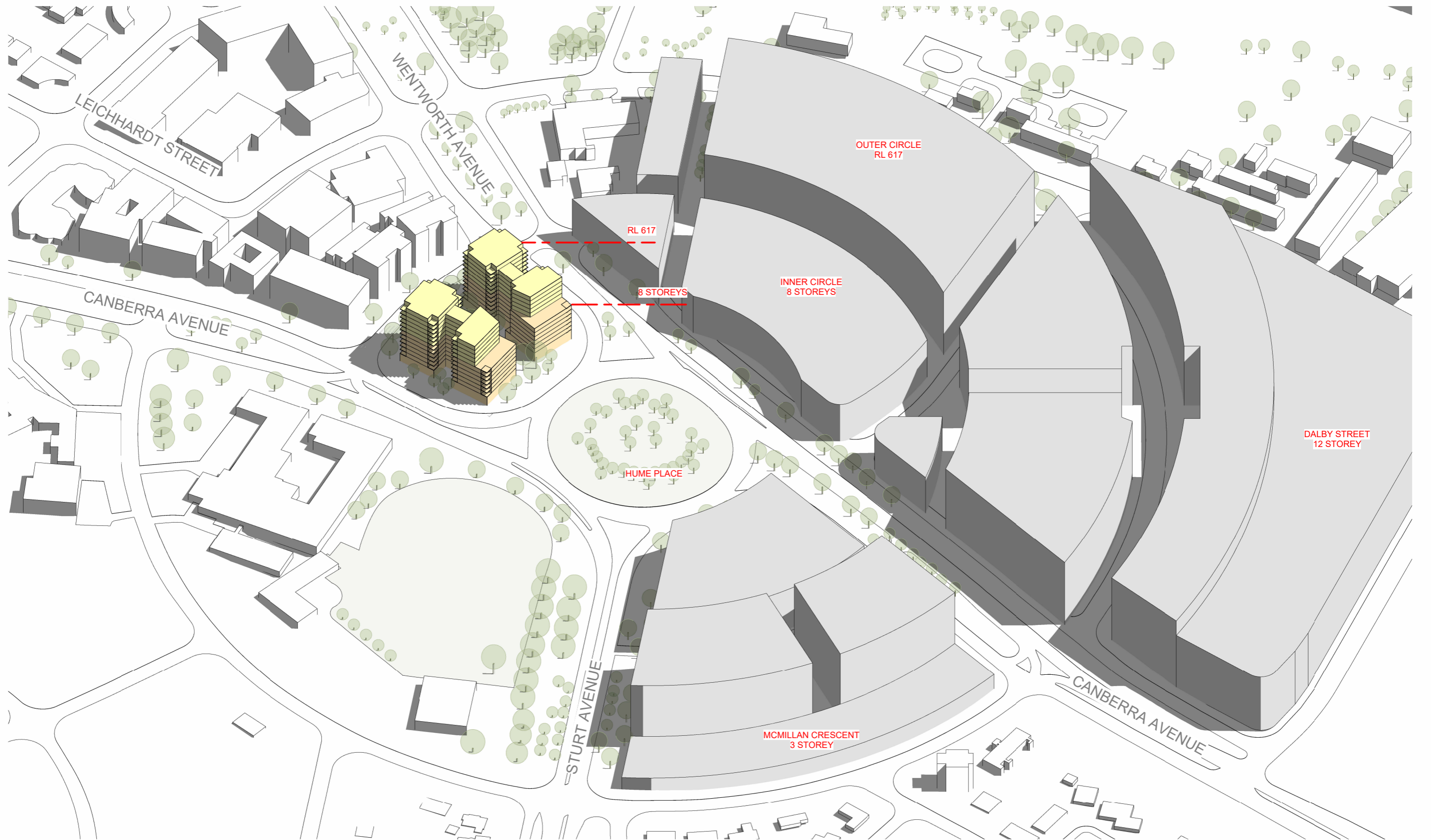
BLOCK 1 SECTION 87 GRIFFITH



1 HUME PLACE ON FLAGPOLE AXIS

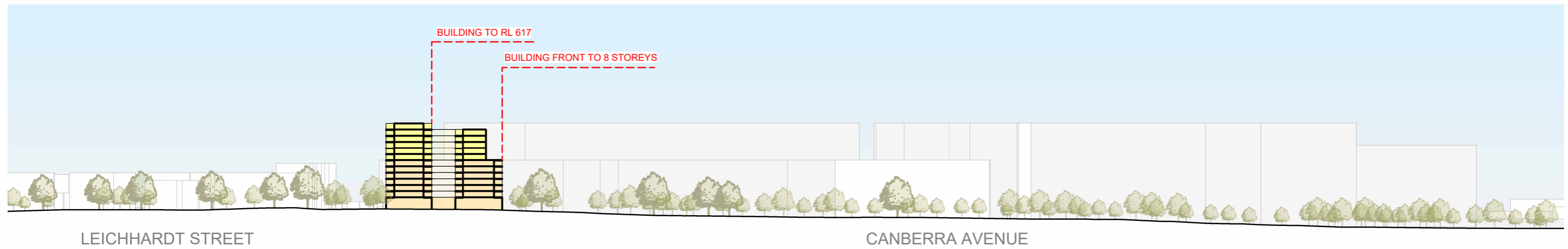
# 3D MASSING

BLOCK 1 SECTION 87 GRIFFITH



# SECTION

BLOCK 1 SECTION 87 GRIFFITH



# SHADOW DIAGRAM - WINTER SOLSTICE

BLOCK 1 SECTION 87 GRIFFITH



1 9am



2 12pm

NO OVERSHADOWING TO COLLEGE OVAL



3 3pm



# SHADOW DIAGRAM - EQUINOX

BLOCK 1 SECTION 87 GRIFFITH



1 9am



2 12pm



3 3pm



# SHADOW DIAGRAM - SUMMER SOLSTICE

BLOCK 1 SECTION 87 GRIFFITH



1 9am



2 12pm



3 3pm



Hi,

I'm reaching out regarding the DA102 process.

In reading the draft amendment I was very pleased to read "placing high value on human scale public places that prioritise pedestrians, cycling, and public transport", as I have a keen interest in Canberra moving toward these ideals. However I was a little troubled to read that the blueprint says "promoting medium and high-density housing in well-located areas close to **existing** public transport connections" (emphasis mine).

This doesn't explicitly call out for new public transport. The most obvious case would be for development of another light rail line through the already medium / high density areas of Kingston. I would like to see the plans more clearly mention new public transport to support this development.

So my questions are:

- \* does the NCA support light rail through this new Hume Circle precinct?
- \* will the NCA actively pursue light rail through this new Hume Circle precinct?
- \* can the plans specifically mention adding new public transport - the light rail specifically?

Thanks for your time,

Liam

## SUBMISSION TO THE NATIONAL CAPITAL AUTHORITY

**Re: Draft Amendment 102 – Hume Circle Precinct**

**To: The Chief Planner and Board of the National Capital Authority 17/02/2026**

I am providing this submission as a directly affected owner/occupier that lies within the Hume Circle Precinct. I purchased my unit in June 2007, have paid it off in full and have made significant improvements to it through renovations during my period of occupancy. I was initially attracted to the Staffordshire Terrace Apartment complex for multiple reasons, including its established nature and strong sense of community, its proximity to my work and its low-rise medium density structure with shared amenities. I was also attracted by the fact that the complex (and the north-facing unit I purchased) backed onto an open green space with mature trees, which provided both privacy and effective soundproofing from Canberra Avenue and the Hume Circle roundabout.

Over the years I have resided there, Staffordshire Terrace Apartments has proven an excellent place to call home. A wide range of residents live in our complex, including young families with children, working couples and singles and retirees. Residents of all ages, ethno-religious and social backgrounds live together in peaceful harmony. Our community is exactly what Canberra should look like and aspire to be.

I believe that there are several areas of legitimate concern in relation to the recently announced National Capital Plan's Draft Amendment 102 – Hume Circuit Precinct (henceforth DA102). First and foremost, I am concerned that the consultation process for DA102 was announced with little warning over the summer and parliamentary recess period, when many residents were away. There was no direct contact from the National Capital Authority to Staffordshire Terrace Apartment residents, who will be directly and significantly affected should DA102 be implemented as per the draft plan. Most Staffordshire Terrace Apartment residents learned of DA102 by word of mouth from fellow residents, who themselves had only learned of it via media reporting (a Canberra Times article published on 21 January 2026).

The initial due date for submissions in relation to DA102 of COB 3 February was exceptionally short and across the peak summer holiday period. This very short timeframe understandably caused considerable angst amongst Staffordshire Terrace Apartment residents. The concerns of residents to DA102 are clearly demonstrated by the fact that a petition raising concerns successfully reached the 500- signature threshold for tabling in the Legislative Assembly in less than a week, with the petition duly tabled on 5 February. It seems evident that the extension of the due date for submissions until COB 17 February was the direct result of political interest following widespread attention, including in relation to the petition. This surely cannot be seen as representing best practice in terms of a consultation process. If standard processes

have been followed in relation to DA102, these processes need to be urgently reviewed to ensure that those standing to be affected by development projects are given fair opportunity to provide input.

I am also concerned about the **practical implications** for my own residence and those of my neighbours should DA102 be implemented without amendment. As far as I can tell from the information available, under DA102 many units within the Staffordshire Terrace Apartment complex will be demolished to make way for 15 story apartment blocks. Those units that do survive will be overlooked by 8 story apartment blocks which will be built right up to the road on both Sturt Avenue and Canberra Avenue, necessitating the removal of the mature trees and other open space in Block 8 Section 84 and along Canberra Avenue. The removal of these trees and open space will in itself have a deleterious environmental impact on the surrounding area. In a best-case scenario, therefore, my unit will survive demolition but I will be subjected to several years of disruption through construction works. Upon completion of the project, I will have lost completely all of the natural light and privacy I currently enjoy, with my back balcony rendered unusable. The resale value of my unit will drop considerably as a result. I therefore have very good personal reasons to be concerned about DA102.

Like other Staffordshire Terrace Apartment residents, I am also concerned about the impact on **traffic flows** that will result from the implementation of DA102. The Hume Circle roundabout is already currently one of Canberra's busiest traffic intersections, with four major roads leading into it. It is particularly busy during the morning rush period and during the school drop off and pick up period. It has a very high accident rate, including the recent tragic incident involving two St Edmund's College students crossing Canberra Avenue. The area around it has limited public transport services, with only one 'R' bus route into the city. Pedestrian movements around the roundabout are difficult due to the necessity of crossing at least one major road without benefit of a dedicated pedestrian crossing. Current residents generally commute to work via car or bicycle. Adding a significant number of new residents to the area will only add to the existing congestion and will further exacerbate current serious vehicular and pedestrian movement shortfalls.

In summary, I do not believe that DA102 will make Canberra a better place. It will, however, have a significant impact on existing residents, particularly those in Staffordshire Terrace Apartments. The consultation process for DA102 has been exceptionally poor and needs to be reviewed as a matter of urgency. I hope that this submission will be given due consideration as the National Capital Authority considers the next steps in relation to this proposal.



# ROUNDHOUSE

HOTELS

16 February 2026

The Chief Planner  
Mr Andrew Smith  
National Capital Authority

By email [draft.amendment@nca.gov.au](mailto:draft.amendment@nca.gov.au)

Draft Amendment 102 – Hume Circle Precinct

Dear Mr Smith

We are pleased to provide a submission in response to Draft Amendment 102 of the National Capital Plan as the lessee of Block 1 Section 87 Griffith which is currently occupied by our Ramada Diplomat Hotel.

As you are aware, we have met with the NCA numerous times since December 2018 to advise and seek NCA's guidelines, to redevelop our site Block 1 Section 87 Griffith to RL617 height. We presented to NCA in 2021 Cox Architecture plans enabling RL 617 height.

We request that Draft Amendment 102 be changed to permit RL 617 on our site. Please note this change to permit RL 617 is supported by Stewart Architecture who have also lodged a submission to this effect.

I will detail the reasons below to support this amendment to RL 617.

Doing this will enable additional housing supply to come into the market. The premise of Draft amendment 102 is to support urban intensification and regeneration. There is a fundamental flaw in the draft amendment in relation to its treatment adjoining Leichardt Street and the Diplomat Hotel site.

The draft amendment proposes a building height of RL617 on Section 25 (adjacent to our Diplomat site) together with open space .

It also proposes 8 storey development on our Diplomat site.

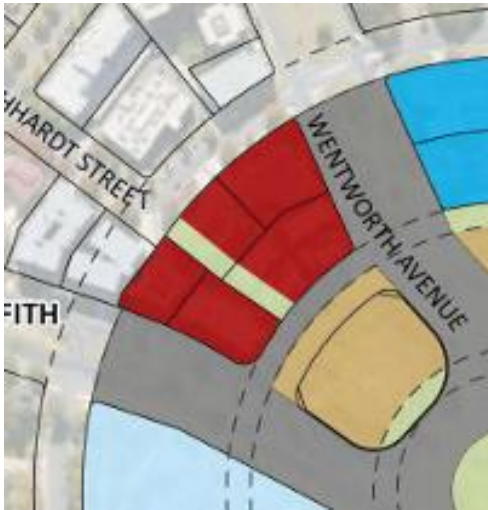
See image below

Belconnen Premier Inn Pty Ltd  
Ramada Diplomat Canberra – Formerly Diplomat Hotel  
and Ramada Encore Belconnen – Formerly Premier Hotel and Apartments  
110 Benjamin Way, Belconnen ACT 2617  
ABN 24 254 191 799  
(02) 6253-3633



# ROUNDHOUSE

HOTELS



Neither RL617 nor the open space will be delivered on Section 25 for at least 50 years (and that is being optimistic).

That is because all blocks on that section have already been fully developed and unit titled. This is evident from the image taken from ACTMAPi below



Belconnen Premier Inn Pty Ltd  
Ramada Diplomat Canberra – Formerly Diplomat Hotel  
and Ramada Encore Belconnen – Formerly Premier Hotel and Apartments  
110 Benjamin Way, Belconnen ACT 2617  
ABN 24 254 191 799  
(02) 6253-3633



# ROUNDHOUSE

HOTELS

That is to be contrasted with our site which is held by one owner and it as end of life and therefore ideally suited to a more intensive development.

We engaged Stewart Architecture in 2024 to investigate possible redevelopment outcomes for their site which forms a prominent part of the Hume Circle Precinct urban renewal area as identified in Draft Amendment 102.

Please find attached proposed plans by Stewart Architecture.  
These plans have also been submitted by Stewart Architecture.

Similarly to Stewart Architecture, we support the inclusion of the Hume Circle Precinct as a Designated Area to be overseen by the NCA to reinstate the Griffins' strong symbolic design for Central Canberra, ensuring development is consistent with the geometry and intent of the Griffins' plan for Canberra.

Furthermore, we support the intent of Draft Amendment 102 to improve urban density, land use and public domain surrounding Hume Circle – creating a distinctive sense of arrival and a symbolic gateway experience on the Canberra Avenue approach route into the National Capital.

Carefully considered density in locations such as Hume Circle will allow residential development which addresses the need for improved housing supply near transport and services. This supports National Cabinet's target to improve housing supply in appropriate locations. The design quality of resultant development proposals will be ensured through the National Capital Design Review Panel process.

We support the provision of 'Land Use A' allowing commercial accommodation, retail and residential amongst other uses. This will support the current high rise along Canberra Avenue adjacent to Hely Street.

For our Block 1 Section 87 Griffith, we envisage high density redevelopment which provides larger apartments appealing to inner south demand, possibly in the form of vertical retirement living. Additionally, it is envisaged the redevelopment may maintain the tradition of hotel accommodation on part of the site.

The development will contribute to Hume Circle becoming a prominent and vibrant mixed-use precinct. We are committed to design excellence and sustainability in the design and delivery of architecture, landscape and public realm.

Belconnen Premier Inn Pty Ltd  
Ramada Diplomat Canberra – Formerly Diplomat Hotel  
and Ramada Encore Belconnen – Formerly Premier Hotel and Apartments  
110 Benjamin Way, Belconnen ACT 2617  
ABN 24 254 191 799  
(02) 6253-3633



# ROUNDHOUSE

HOTELS

Suggested Modification to Draft Amendment 102 prepared by Stewart Architecture is below.

Block 1 Section 87 Griffith sits within the ‘inner circle’ of the Hume Circle Precinct.

We acknowledge the general height strategy of the inner circle built to 8 storeys allowing ‘buildings within a landscape’ to define the inner gateway experience. Buildings to the outer circle are then permitted to RL617.

Draft Amendment 102 suggests land to the north-west of Block 1 Section 87 permits development to RL617. All the identified sites have been redeveloped in recent years – to heights only ranging between four and eight storeys.

Because the majority of these sites are now strata residential it is highly unlikely that further increase to height will ever occur, thereby limiting the potential to realise appropriate development density in this part of Hume Circle.

Block 1 Section 87 provides opportunity to achieve both the desired built form and urban density envisaged for the Hume Circle Precinct if heights on part of the site are increased in accordance with our design studies.

Our studies propose built form consisting of underground parking (no podium) and two tower elements up to RL617 with separation to frame the vista along Canberra Avenue to the Parliament House flagpole. The built form steps down to 8 storeys at the Hume Place frontage to maintain the scale of the inner gateway experience.

Taller building on Block 1 Section 87 will not have adverse impact on surrounding sites. Our winter shadow analysis confirms no major overshadowing of adjacent sites including the St Clare’s College oval.

Importantly our proposal does not diminish the primary radial and circular structuring geometry of the Hume Circle Precinct, and the framing of the vista to Parliament House will enhance the sense of arrival and symbolic gateway experience.

We request the NCA’s consideration of our proposed changes to Draft Amendment 102.

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(02) 6253-3633



**ROUNDHOUSE**

HOTELS

We would welcome the opportunity to meet with the NCA and present our proposal.

Regards

Hugh Cooke  
Director  
Belconnen Premier Inn Pty Ltd

Belconnen Premier Inn Pty Ltd  
Ramada Diplomat Canberra – Formerly Diplomat Hotel  
and Ramada Encore Belconnen – Formerly Premier Hotel and Apartments  
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(02) 6253-3633

# StewartArchitecture

Block 1, Section 87, Griffith  
Concept Design

Canberra Studio  
10/285 Canberra Avenue  
Fyshwick ACT 2609  
+61 2 6228 1200

Sydney Studio  
2/233-235 Bulwara Road  
Ultimo NSW 2007  
+61 2 9061 4760

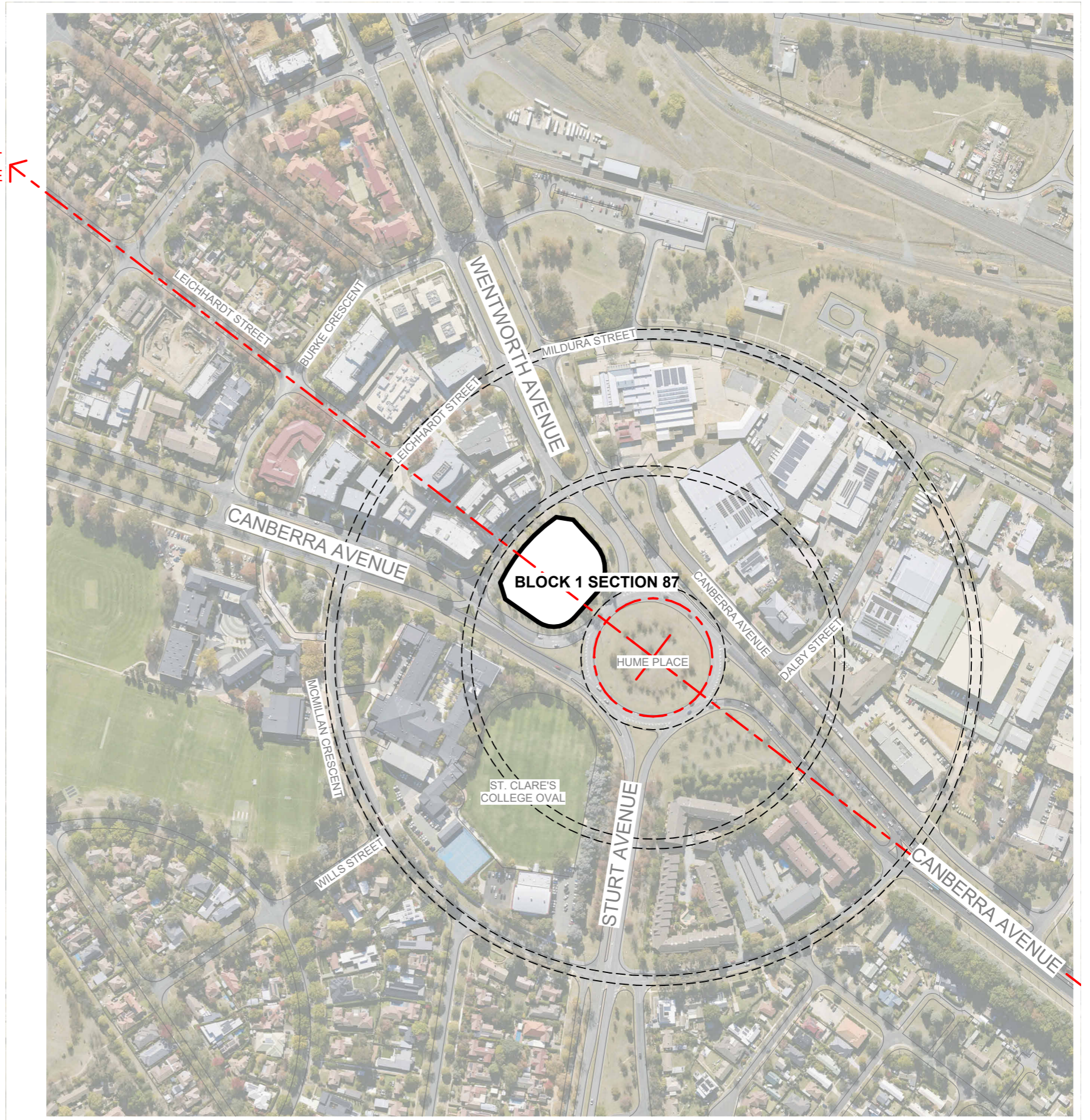
[office@stewartarchitecture.com.au](mailto:office@stewartarchitecture.com.au)  
[www.stewartarchitecture.com.au](http://www.stewartarchitecture.com.au)

# LOCATION PLAN

## BLOCK 1 SECTION 87 GRIFFITH

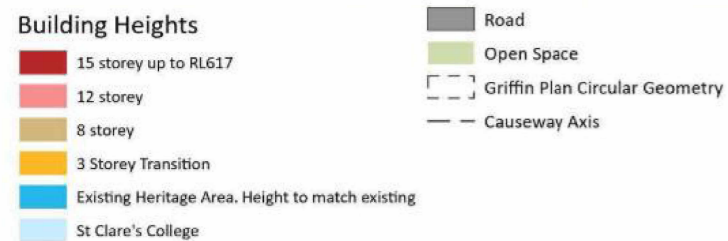
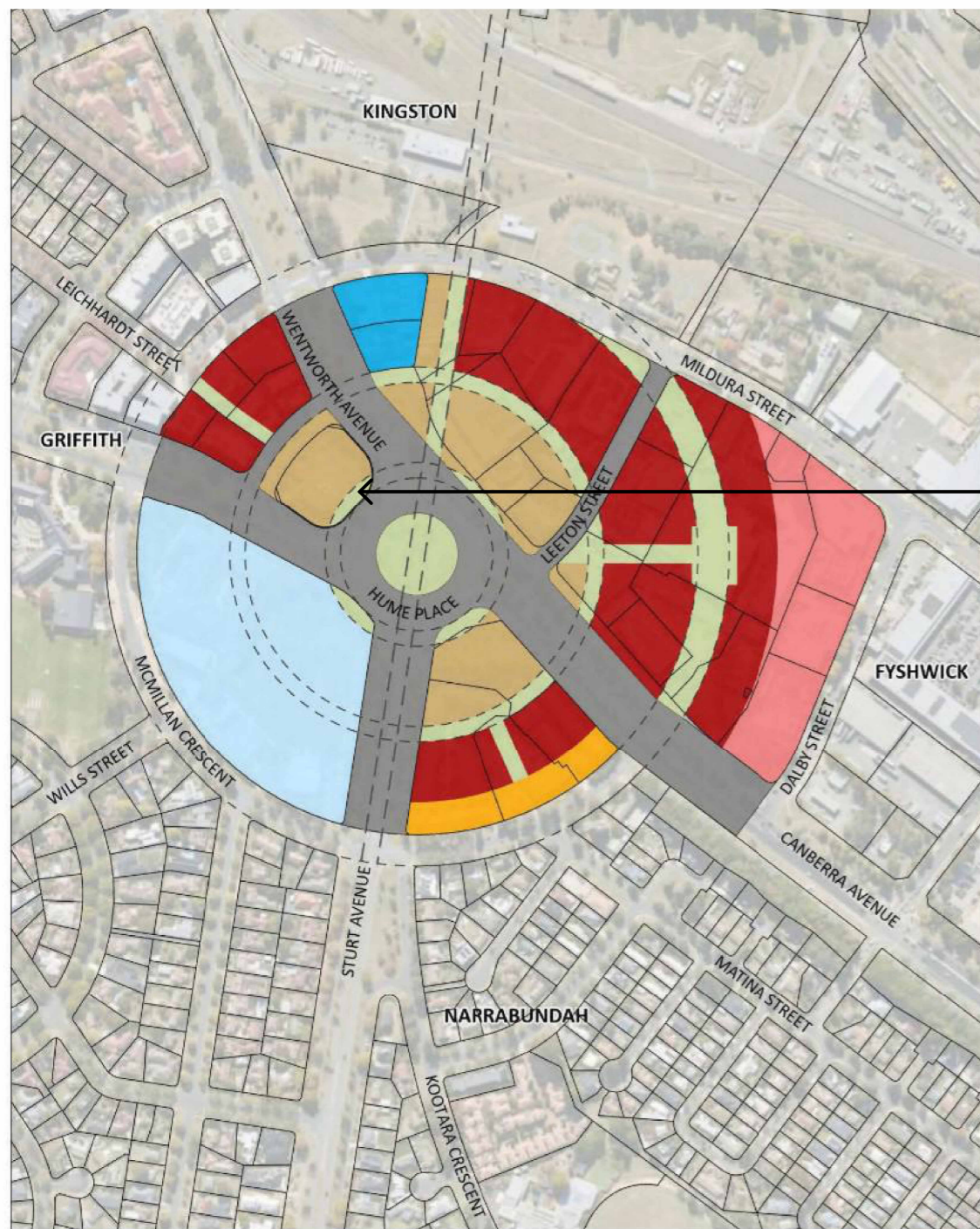
NO	TITLE	REV
SK1	LOCATION PLAN	A
SK2	NCA DRAFT AMENDMENT	A
SK3	3D MASSING	A
SK4	3D MASSING	A
SK5	3D MASSING	A
SK6	SECTION	A
SK7	SHADOW DIAGRAM - WINTER SOLSTICE	A
SK8	SHADOW DIAGRAM - EQUINOX	A
SK9	SHADOW DIAGRAM - SUMMER SOLSTICE	A

TO PARLIAMENT  
HOUSE FLAGPOLE



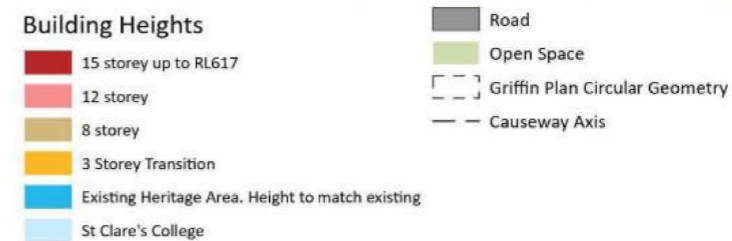
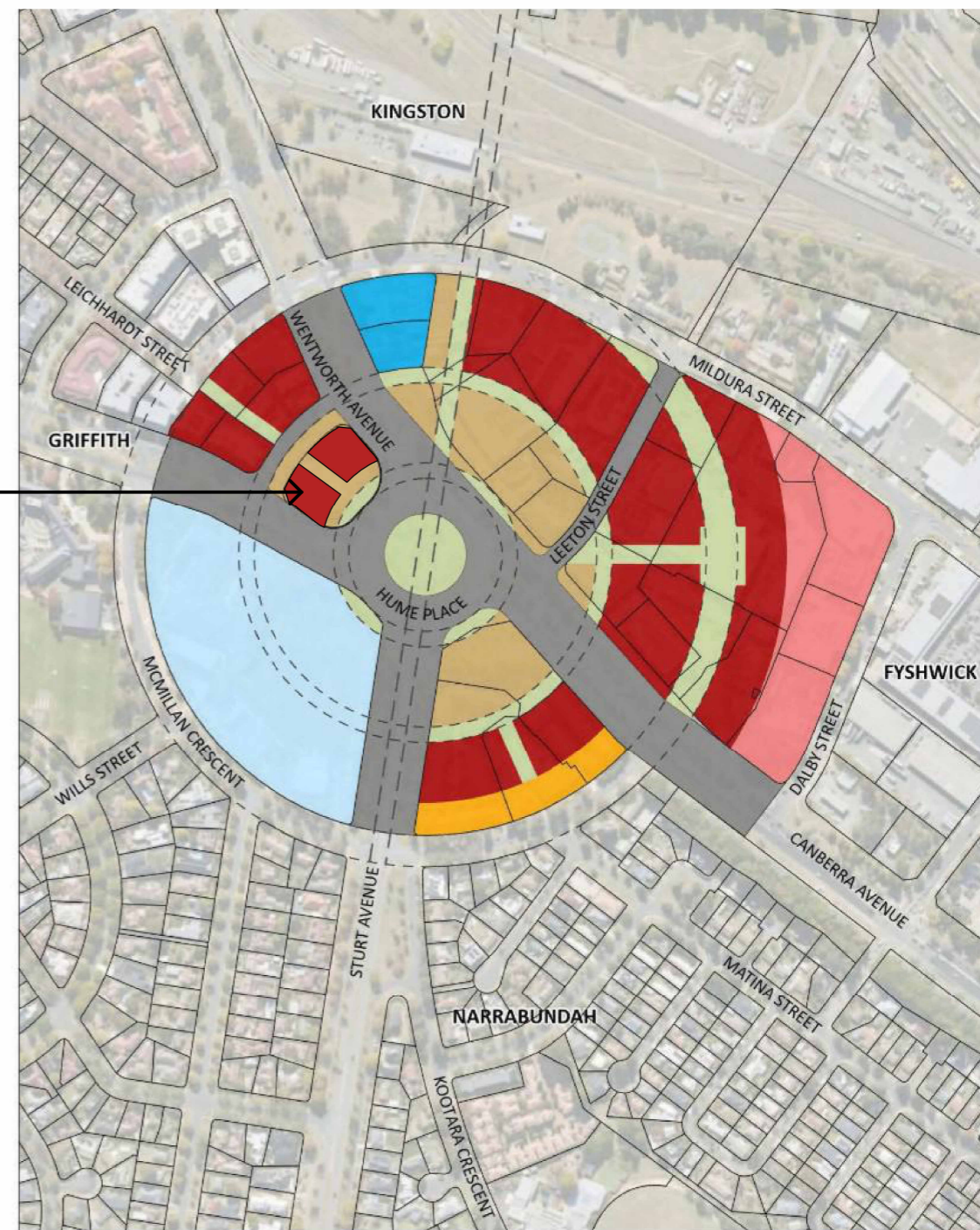
# NCA DRAFT AMENDMENT

BLOCK 1 SECTION 87 GRIFFITH



**NCA DRAFT AMENDMENT 102**

BLOCK 1  
SECTION 87

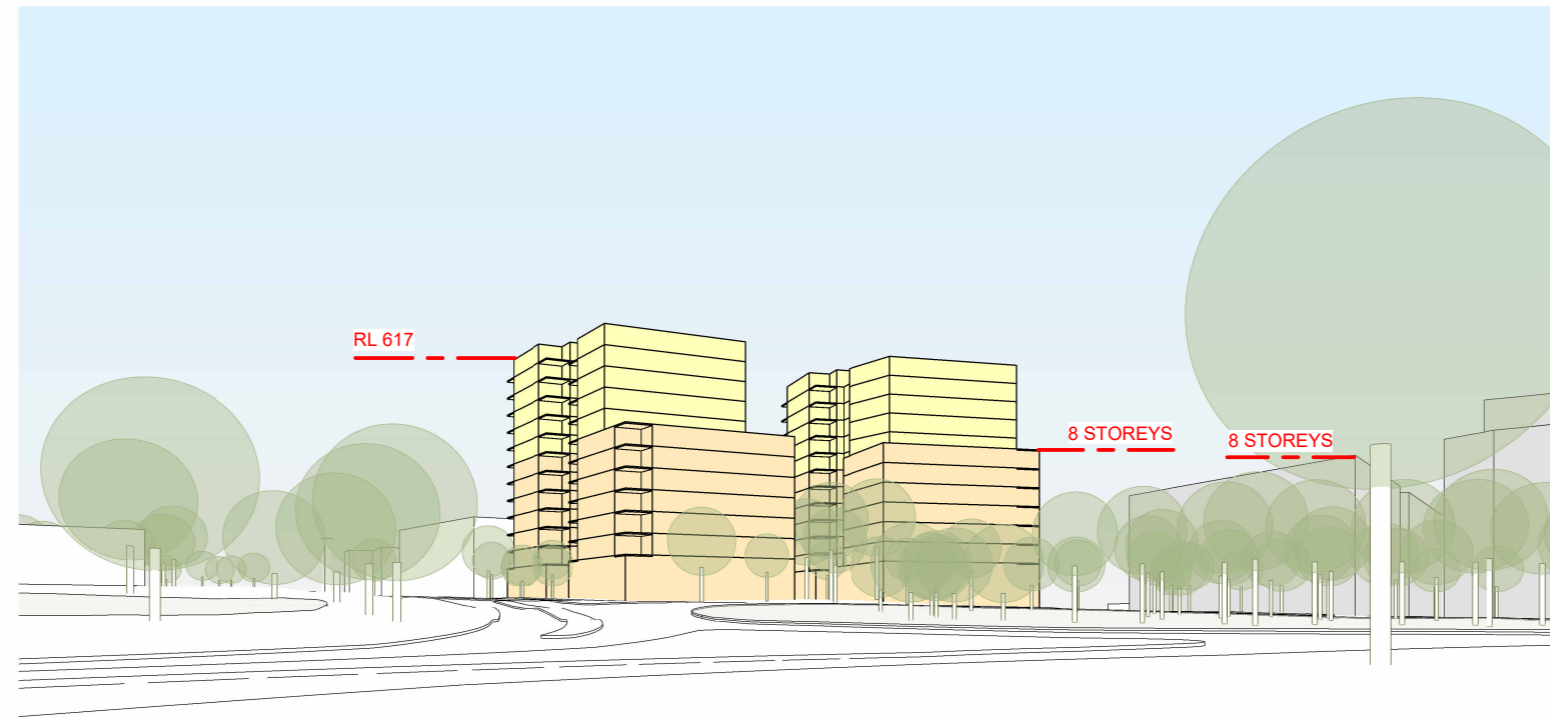


**PROPOSED CHANGES TO AMENDMENT 102**

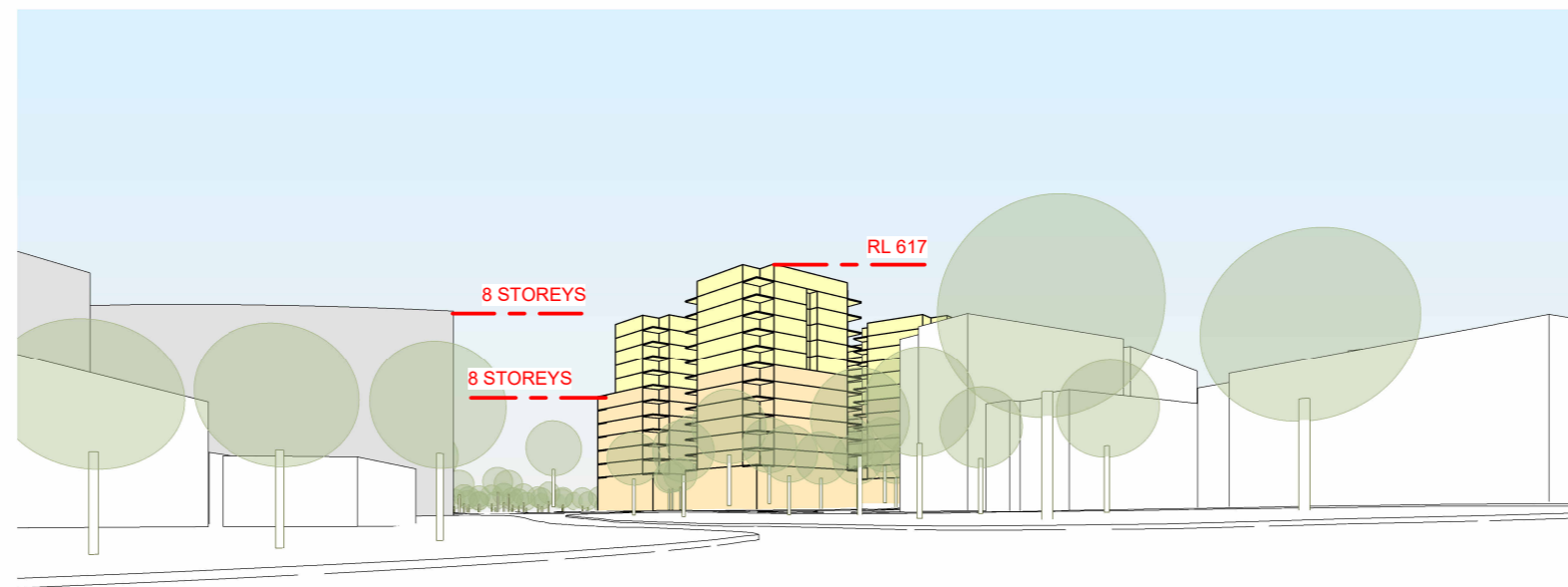


# 3D MASSING

BLOCK 1 SECTION 87 GRIFFITH



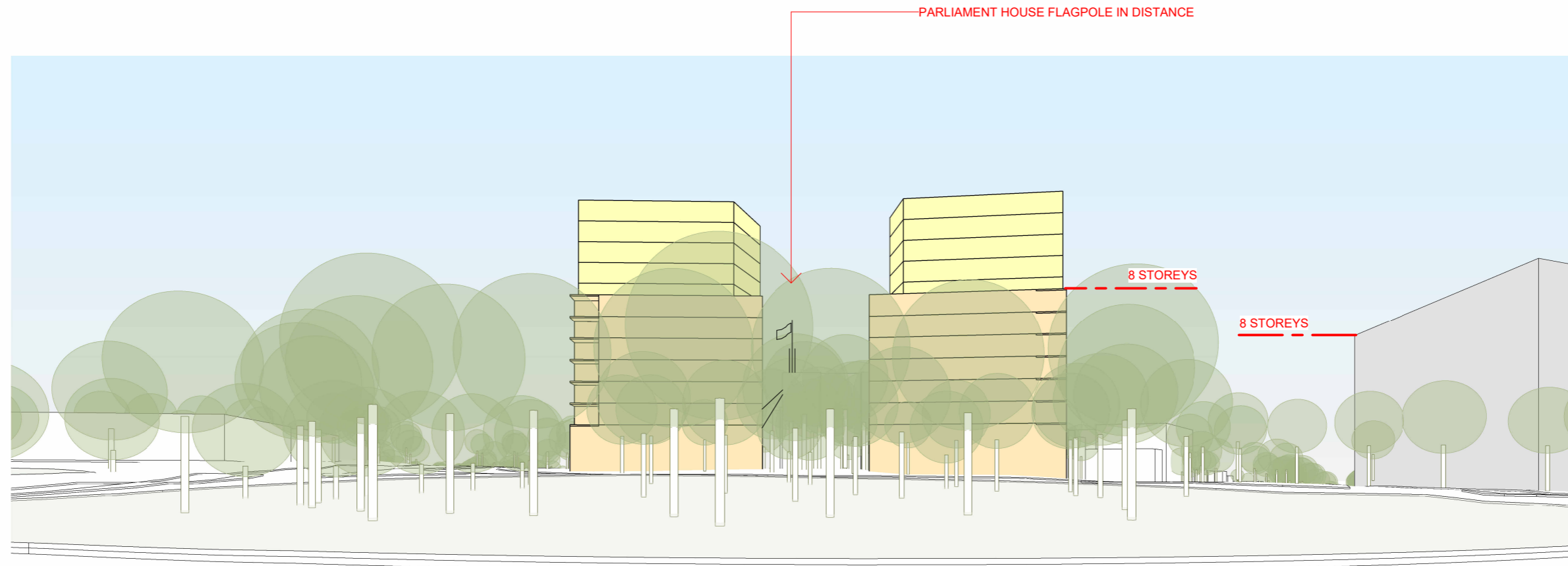
1 PERSPECTIVE FROM STURT AVENUE



2 PERSPECTIVE FROM WENTWORTH AVENUE

# 3D MASSING

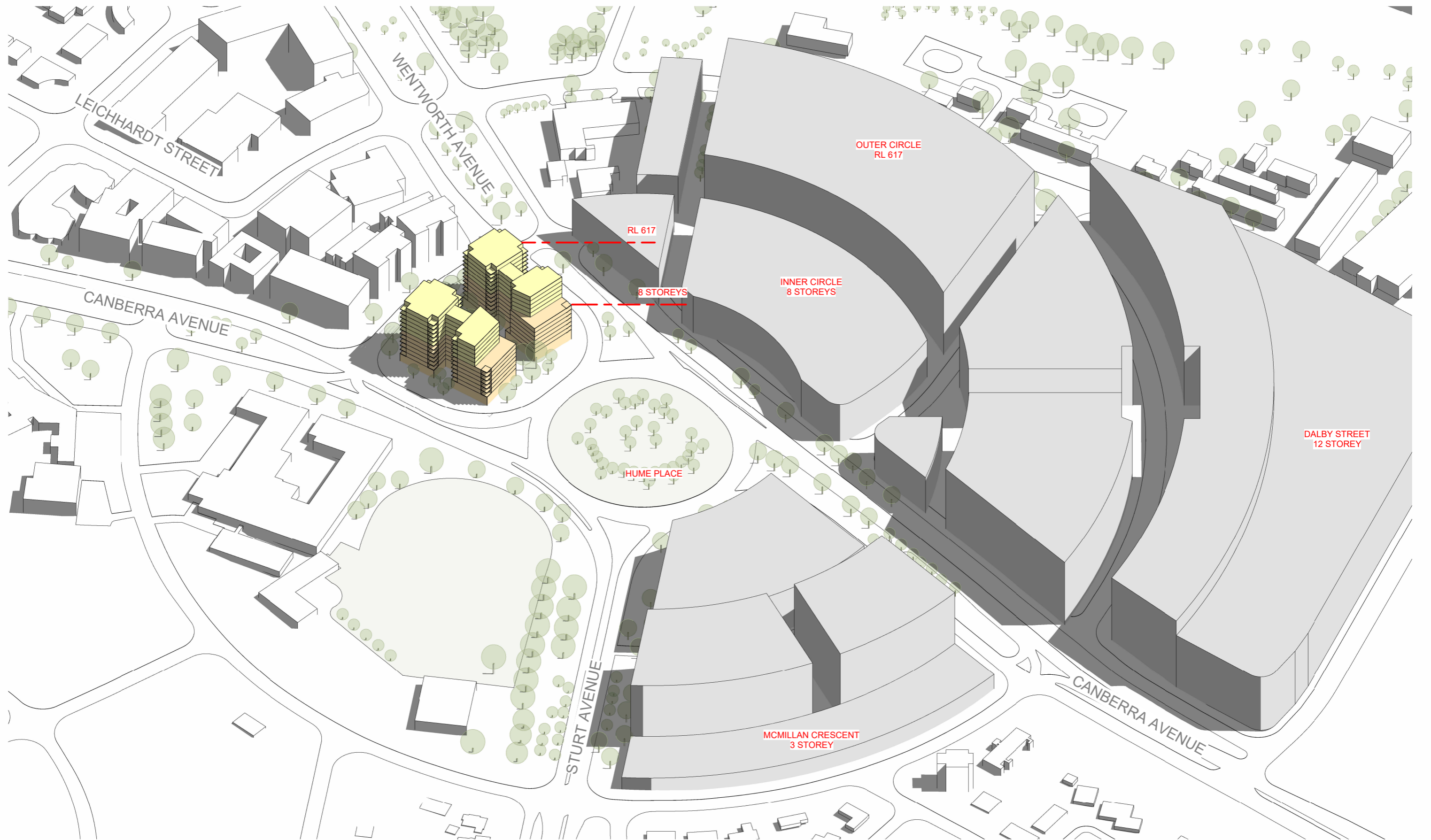
BLOCK 1 SECTION 87 GRIFFITH



1 HUME PLACE ON FLAGPOLE AXIS

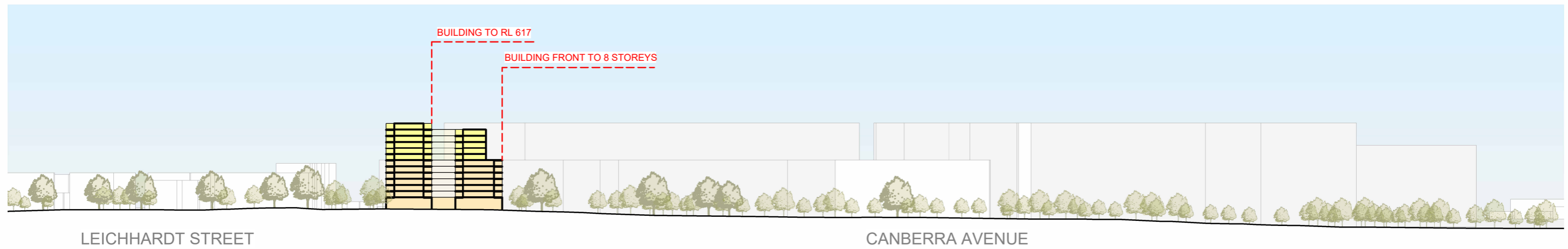
# 3D MASSING

BLOCK 1 SECTION 87 GRIFFITH



# SECTION

BLOCK 1 SECTION 87 GRIFFITH



# SHADOW DIAGRAM - WINTER SOLSTICE

BLOCK 1 SECTION 87 GRIFFITH



1 9am



2 12pm

NO OVERSHADOWING TO COLLEGE OVAL



3 3pm



# SHADOW DIAGRAM - EQUINOX

BLOCK 1 SECTION 87 GRIFFITH



1 9am



2 12pm



3 3pm



# SHADOW DIAGRAM - SUMMER SOLSTICE

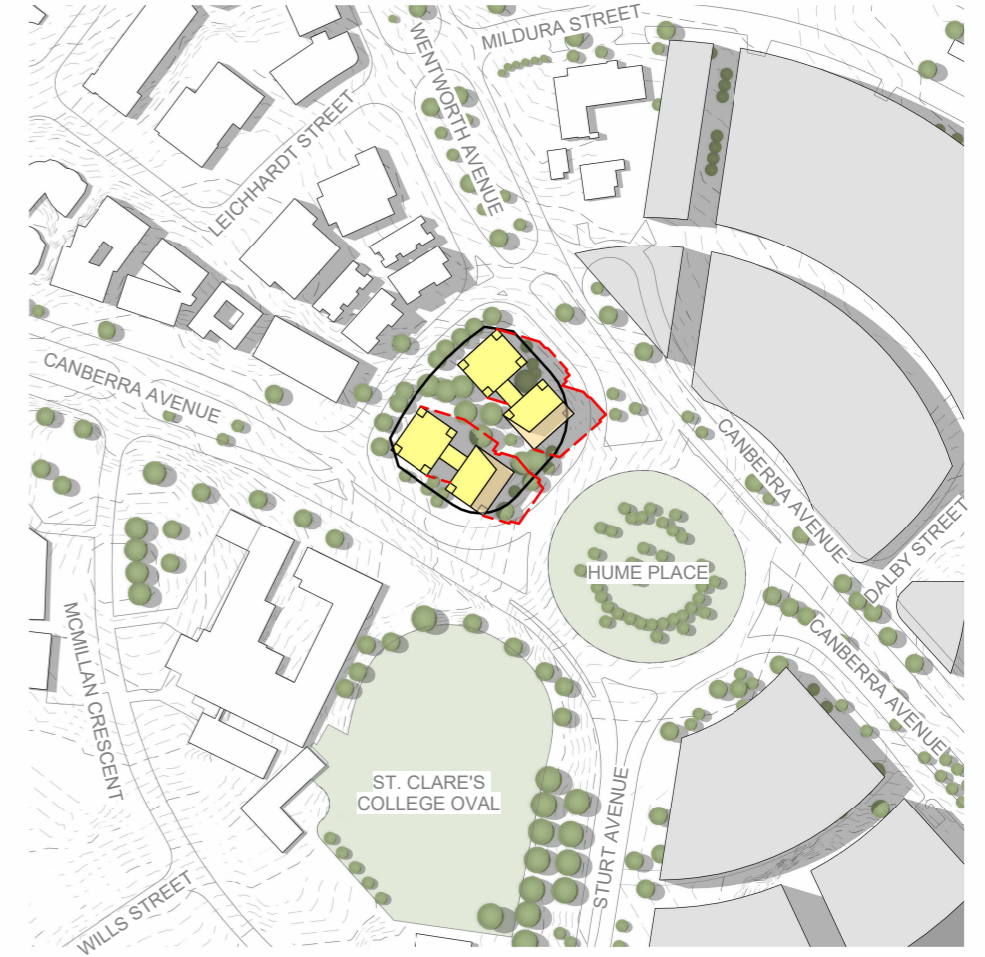
BLOCK 1 SECTION 87 GRIFFITH



1 9am



2 12pm



3 3pm



Andrew Smith  
Chief Planner  
National Capital Authority

17 February 2026

## National Capital Plan Amendment 102 – Hume Circle Precinct

Greater Canberra welcomes the opportunity to support Plan Amendment 102, for a substantive increase in the South Canberra district's housing stock and ensuring cohesion with the Griffin Plan.

### About Greater Canberra

Greater Canberra is a grassroots community organisation that advocates for a more affordable, liveable, and sustainable Canberra. We believe that urban intensification and higher-density living is critical to making our city more environmentally friendly and sustainable while also providing the housing our city needs. However, exclusionary planning laws and reliance on suburban infrastructure pose major urban design challenges as Canberra plans for a future impacted by climate change and increased environmental stressors.

### Support for PA-102

Greater Canberra calls for urban infill as a method of increasing supply to combat the housing crisis, as a method of environmental protection, and as a method of providing housing for Canberrans in existing communities with existing amenity. In our belief, PA-102 aligns with these goals well, through the method of fulfilling multiple levels of government's commitment to supply-side and equity-based housing policy, other specific place commitments in the amendment's vicinity, and the benefits in terms of urban regeneration and its alignment with the core tenets of the Griffin Plan.

### PA-102 as a method of fulfilling supply-side and equity commitments

Many of the areas in subject of the draft plan amendment find themselves neglected – the former Canberra Milk factory, the reserves south of the railway station, and the disused sidings where the Commonwealth has [committed to enable 5,000 homes](#) – and in a housing crisis, with both governments' at the federal and territory level's goals of enabling supply in existing communities is paramount. PA-102 enables this work to occur in a central location in Canberra's Inner South.

The federal government maintains a [goal of supporting the construction of 1.2 million homes in five years from mid-2024](#). The territory government maintains a goal of enabling [30,000 homes by 2030](#) through planning reform, transit oriented development, town and group centre densification, and land release. The federal government's *Housing Australia Future Fund* aims to deliver 20,000 social homes and 20,000 affordable homes for Australians. Collaboration

between the ACT's *Suburban Land Agency* and the federal government's *Housing Australia* as well as private and non-profits in the provision of build-to-rent developments has provided early release projects in Turner, with ones in Woden Town Centre to come.

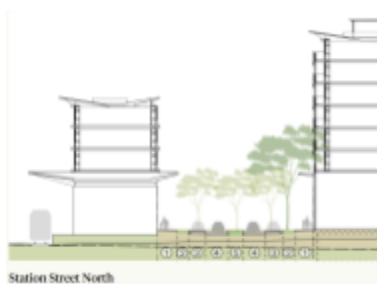
**Recommendation:** Ensure the delivery of affordable, social, public, and build-to-rent housing alongside this amendment.

Greater Canberra's core belief is that this plan amendment represents a **significant opportunity to ease supply constraints and ease housing into existing communities**. This is the infill Canberra needs. The fork in the road the amendment's implementation represents is how this housing is provided. The ACT has an above-average rate of public and supported housing when compared to the national average – 6.2% of total dwellings compared to 3.1% nationally. Canberra's inner southern suburbs have previously had [very public problems](#) with the provision of public housing in existing communities – let's set a strong commitment to dignified and affordable housing in our communities.

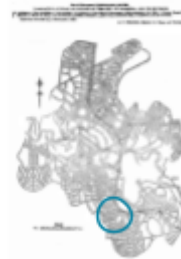
## PA-102: alignment with the Griffin Plan and other documents

Plan Amendment 102 represents a fantastic opportunity to provide more alignment with the core values and tenets of the Griffin Plan more broadly, but especially in relation to the approach avenues and residential development in their vicinity. NCA document [The Griffin Legacy](#) is unequivocal in its commitment to quality, dense residential development along Canberra's approach and main avenues.

*The Griffin Legacy* strategy has, as one of its eight propositions, the reinforcement of the main avenues "as **primary corridors** for public transport and **dense, mixed-use development** with the vibrancy, elegance[,] and pedestrian character of boulevards." We prosecute that adding the blocks surrounding the Hume Circle roundabout into the list of *Designated Areas* under the *National Capital Plan* fulfills this very well – particularly with the inclusion of synergy with the [East Lake Place Plan](#).



The EPSDD's *East Lake Place Plan* provides for dense residential development on disused industrial land in the Inner South. PA-102 enables this.



Commonwealth Gazette No. 99, 19-2393. Note the dense node around what is now Hume Circle. Said node is circled.

**Recommendation:** Ensure alignment between PA-102 and the East Lake Place Plan to enable dense, vibrant living around Hume Circle, and the realisation of the Griffin legacy.

PA-102 is the missing piece of the puzzle for the Place Plan. By aligning planning controls, we can ensure a seamless transition from the industrial heart of Fyshwick to a modern, mixed-use precinct. Increased density here will provide the 'critical mass' of residents needed to support local business, public transit frequency and the revitalization of the railway station.

## PA-102 – specifics of land use and combatting NIMBY narratives

In terms of land use, we have a sorry state of affairs in swathes of the Inner South. Hume Circle was originally planned as a grand radial gateway to southern Canberra. Replacing what is currently derelict low-scale industrial sheds with high-quality architectural forms and reinstated axial streets would be a long overdue completion of the original vision for real land use outcomes in well-located communities.

This does not represent a significant loss in industrial land in Canberra. Estates such as Hume, Mitchell, and Beard provide ample industrial land use, alongside estates over the border in Queanbeyan.

**PA-102 begins the work of repairing the issues in Canberra's inner south in respect to land use.** From Hume Circle, it is only walking distance to three schools (St Clares', St Edmunds', and Narrabundah), to two group centres (Kingston and Manuka), and to numerous other precincts and amenities – from Kingston Foreshore to the Fyshwick Markets.

**This is land we cannot pass up if we want a smarter, more efficient city.** By rezoning this area to permit high-density residential and mixed-use development (up to 15 storeys), the NCA is creating space for thousands of new residents in the Inner South, an area with high demand and excellent access to existing jobs and services.

**Central Recommendation:** Pass PA-102 to enable better land use, a more sustainable city, and well-connected, cohesive neighbourhood fabric.

While some local groups may call for a 'pause' or 'reduction in scale,' Greater Canberra believes that **the social cost of inaction is too high. Every home not built in the Inner South is a home built on the fringe, leading to longer commutes and higher rents** for everyone. We urge the NCA to proceed with DA102 without diluting its density targets.

## Conclusion

Greater Canberra commends the National Capital Authority for its forward-thinking approach to the Hume Circle Precinct. This amendment is a win for housing affordability, a win for environmental sustainability, and a win for the future of our National Capital. **For a better city, pass this amendment in full.**

TO WHOM IT MAY CONCERN

I welcome the opportunity to submit my opinion on the NCA Draft Plan Amendment 102 – Hume Circle Precinct. I fully support the submission of the Griffith Narrabundah Community Association as well as those of the owners of flats in Staffordshire Terrace.

However, in addition I would like briefly to discuss one subject that none of the above-mentioned submissions have dealt with. That concerns the probity of submitting the future inhabitants of the planned high-rise flats around Hume Circle to the air and noise pollution of a much-used traffic artery, including heavy diesel trucks, unlikely to be turning into EVs during the next decades.

There is a large amount of medical literature documenting that the health of people living next to traffic arteries is much damaged by air and noise pollution. Not only children are affected but also adults of all ages to the point of an early onset of dementia and death.

With Australia's population density being one in the lowest in the world with 3 people per sq.km, it seems absurd that however much accommodation is in short supply, people must be living in the narrow band of heavy pollution along major roads. Especially in this case where the relatively large area of Eastlake and the railway yards to be developed for housing away from the traffic, could easily absorb the population of the proposed high-rise flats next to the road. Moreover, this plan is unlikely to be in tune with the Human Right to a Healthy Environment legislation passed by the ACT Assembly.

The Hume Circle Draft Plan Amendment claims that the proposed high-rise around Hume Circle is in accordance with Griffin's design. Griffin did not design an empty circle surrounded by the flow of traffic, but a railway station which at his time was a representative building surrounded by lower structures for hotels, restaurants, banks, shops, etc. of service to travelers. Once Griffin's station has been moved, so should the buildings he designed for the surrounding area. The expanse next to the present roads should be used for trees and other vegetation to protect the adjoining blocks from traffic pollution in accordance with Griffin's design and philosophy.

Yours sincerely,

Beatrice.



Chief Planner  
National Capital Authority  
GPO Box 373  
Canberra ACT 2601

[draft.amendment@nca.gov.au](mailto:draft.amendment@nca.gov.au)

**Re: Draft Amendment to the National Capital Plan 102- Hume Circle Precinct**

To whom it may concern

The Old Narrabundah Community Council Inc (ONCC) objects to the Draft Amendment to the National Capital Plan 102 – Hume Circle Precinct on the basis that the public consultation process has been wholly inadequate for a proposal that has such a significant and profound affect on local residents. We believe the amendment should be withdrawn, and that genuine consultation take place with affected owner-occupiers and leaseholders who are alarmed by the prospect of being displaced from their homes and workplaces.

ONCC supports the petition tabled on 5 February 2026 by residents of Staffordshire Terrace who are directly impacted by the proposal and expressed their concern about the timing and adequacy of the consultation process, the lack of direct notification to affected owner-occupiers, and the potential loss of established medium-density housing, green space, amenity, and community cohesion. ONCC shares these concerns and trusts that prior to any potential development proposals being considered by NCA in the future, that genuine consultation takes place with the members of the community most affected by the changes, including the residents of Staffordshire Terrace.

In regard to the specific details of the Draft Amendment there are several elements that concerns us, most notably that 'active travel' and connectivity issues are not adequately addressed. ONCC would like to see clearer design rules around the vehicular, pedestrian and bicycle path linkages to Sturt Avenue, Wentworth Avenue and Canberra Avenue. At a minimum, our expectation is that any proposed Precinct Plan should explicitly require the Detailed Conditions for Planning Design and Development (DCPDD) to outline how the proposed development meets the requirements of all three modes of transport demanded of Hume Circle.

For several years, ONCC has lobbied the ACT Government to address the dangerous intersection at Sturt Avenue and McMillan Crescent (which is less than 200 metres from Hume Circle, and which falls within the area of DA 102). We note recent notifications from ACT City Services that design work is underway on Hume Circle improvements, investigating ways to improve traffic flow and safety. The intersection has been identified by City Services as in need of improvements to reduce crashes, therefore improving safety and increasing intersection capacity for all road users. We trust the NCA is aware of these issues and will ensure they are addressed through the DCPDD.

Finally, ONCC notes that the NCA has previously met with property developers on the future of Hume Circle, and that persistent lobbying by the Jega Consortium in particular appears to have prompted the NCA to take this course of action. ONCC and our constituents are concerned that a company that stands to profit from this proposal has such a degree of influence over the NCA and the National Capital Plan and we respectfully suggest that NCA members publicly disclose any potential conflicts of interest to safeguard the integrity of the process.

Yours sincerely

*Andy Botham*

**Andy Botham - Chair**

Old Narrabundah Community Council

*Serving the Community*

Email: [chair@narrabundah.org.au](mailto:chair@narrabundah.org.au)

## Draft Amendment to the National Capital Plan 102- Hume Circle Precinct

Dear Sir,

I would like to record an objection to this Draft Amendment to the National Capital Plan 102 – Hume Circle Precinct.

My first concern is the inconceivable disregard of the National Capital Authority (NCA) to think that they, as an unelected body, could declare an area a 'precinct' without community consultation. The Hume 'precinct' in part covers an area not currently under the control of the NCA and a way around this zoning is to declare it a 'precinct' thus giving the NCA all powers to set the pathway for future development in the whole area. What has been proposed is completely outside the current ACT Territory Plan which has been through extensive consultation with communities.

To be confronted with something so in opposition to the current ACT Territory's Building Codes, without any prior community consultation, and to discover that the NCA Hume Precinct idea originates from lobbying by private developers leaves me wondering whether proper process is being followed by the NCA and questioning how much power private developers have to influence decisions made by the NCA.

The timing of the notification of this DA, over the Christmas New Year holiday period, and the original short turnaround period for comment leaves the community at a disadvantage. The Minister responsible and the leadership of the NCA need to acknowledge that this DA fully disregards their own NCA rules around meaningful consultation with community on development proposals. In fact, an independent review should be carried out on the process of this DA.

The fact that this DA is already leading to rumours that business leases are not being extended or renewed in the proposed precinct area, and that the proposal will lead to displacing people from their homes then the NCA may be looking at a Human Rights fight if it is allowed to go ahead. Let's hope this is not the case and that a decision is made to withdraw this DA and the process is allowed to start over.

Your Sincerely,

John Keeley OAM

Resident of Old Narrabundah

## Submission to the National Capital Authority

Draft Amendment 102 (DA102), in its current form, was made without prior consultation of the people that ACTUALLY live in this area and does not take in consideration the Human factor.

Staffordshire Terraces is composed of people who invested dearly in their homes, elderly people live here, immigrants that waited months and years to get a house in a extremely difficult housing market, young people that bought their first home through a mortgage to start a life together, vulnerable people that found a safe and enjoyable place to live and even aboriginal people live here.

I am 200% against the Draft Amendment 102.

I believe that this process was conducted in bad faith by being published during the holiday period and must be canceled.

Moreover, The Planning and Land Management Act enables areas of the National Capital to be designated where special national characteristics are clearly present. On the basis of the material currently in the public domain, it is difficult to identify what specific national capital attributes within this established residential setting warrant the proposed extension of Designated Area controls.

Draft Amendment 102 relies in part on a “gateway” framing. Historically, gateway treatments in Canberra were closely associated with coordinated national movement infrastructure and major civic arrival sequences. Griffin’s planning intent for approach corridors was embedded within an integrated transport vision, including the anticipated rail spine toward Jervis Bay and the wider regional network.

That level of strategic infrastructure context is not presently evident at Hume Circle. The location:

- is not rail-served
- does not operate as a metropolitan interchange of national significance
- functions primarily as a vehicular roundabout within a residential and school catchment

In this context, the case for elevating the precinct to a heightened Designated Area status would benefit from much clearer articulation.

The presence of redevelopment capacity alone does not inherently establish national capital significance, and increased building height does not, of itself, create gateway character. Without the civic, transport and symbolic elements that historically underpinned Griffin’s gateway logic, the proposed escalation risks appearing misaligned with the actual function of the place. Should the Authority maintain that a gateway condition is appropriate, it would materially assist transparency to clearly set out:

- the specific national capital values being expressed
- the evidence demonstrating those values at this location
- how the proposed scale compares with established Canberra precedent for nationally significant approach corridors

Absent that clearer demonstration, the planning rationale for expanding Designated Area controls in this precinct remains insufficiently substantiated.

Nuno Santos

Andrew Smith  
Chief Planner  
National Capital Authority  
[Andrew.Smith@nca.gov.au](mailto:Andrew.Smith@nca.gov.au)

Dear Mr Smith

**RE: Draft Amendment to the National Capital Plan 102 (DA102) Hume Circle**

Thank you for providing DA102 for consideration by the Territory Planning Authority (TPA). The TPA has consulted with relevant ACT Government entities, and the attached consolidated advice is provided for the National Capital Authority's consideration.

The TPA is generally supportive of the proposed changes, noting the intent to respect the original Griffin Plan and to achieve the original intent of Hume Circle as a key gateway and axial connection. There are several matters that the TPA requests be further considered in potentially progressing the draft amendment. The TPA's submission is at Attachment A.

Noting the proposal's interdependencies and close connection with the East Lake area, where further planning work is currently being undertaken by the TPA and the Suburban Land Agency (SLA), I also provide a submission from the SLA for consideration (Attachment B).

The intention to develop Detailed Conditions of Planning, Design and Development is noted. These will be vital in understanding future development opportunities and potential impacts. Should DA102 proceed, the TPA would welcome the opportunity to provide input into the development of these conditions.

If you have any questions relating to these comments, please contact the Territory Plan & Planning Reform Team at [Terrplan@act.gov.au](mailto:Terrplan@act.gov.au). I am also happy for you to contact me directly to discuss.

Yours sincerely



George Cilliers  
Chief Planner  
Territory Planning Authority  
17 February 2025

## **Territory Planning Authority Submission**

### **Hume Circle - Draft Amendment 102 NCP**

The Territory Planning Authority (TPA) welcomes the opportunity to provide comment on Draft Amendment 102 (DA102) to the National Capital Plan (NCP).

Overall, the TPA is supportive of the vision to enhance Hume Circle as a precinct and eastern gateway to the Central National Area. It is understood that DA102 will be followed by Detailed Conditions of Planning Design and Development (DCPDD). These will be vital in understanding and mitigating the potential impacts of the envisaged development in the precinct and the TPA would welcome the opportunity to collaborate in the development of these conditions, should DA102 proceed.

Notwithstanding this, the TPA would like to bring the following comments and concerns to the National Capital Authority's (NCA) attention in considering and progressing DA102.

#### **1 Consultation and community engagement**

Following requests from the community, the TPA and the Chief Minister and Minister for Planning and Sustainable Development, the consultation period for DA-102 was extended from 3 February 2026 until 17 February 2026. However, feedback received by both the TPA and the ACT Government indicates that many community members do not consider this timeframe sufficient to fully understand and respond to the proposal.

An e-petition (E-PET-005-26) [Draft Amendment 102 - Hume Circle Precinct \(Staffordshire Terrace\) ACT Legislative Assembly](#) with 585 signatures was tabled in the Legislative Assembly on 5 February 2026. The petition raises concerns about the adequacy of consultation, lack of direct notification to affected owner-occupiers, and potential loss of medium-density housing, green space, amenity and community cohesion. It also highlights community concern regarding significant increases to building height and density proposed for the Hume Circle Precinct, including areas currently occupied by established low-rise residential complexes such as Staffordshire Terrace.

Residents note that the precinct already provides housing diversity within the inner south and are concerned that the proposed changes would permanently alter the established character and livability of the precinct.

The ACT Government recommended that consideration be given to further consultation being undertaken with residents within and surrounding the proposed designated area.

The TPA can support the National Capital Authority (NCA) by providing address data for affected and adjacent leaseholders to enable direct written notification. This approach aligns with standard TPA practice for major plan amendments involving rezoning.

A further extension to the consultation period could be considered to allow the community adequate time to consider the proposal. For example, the Inner South Canberra Community Council (ISCCC) has scheduled a public forum on 23 February 2026, and extending the consultation would enable residents to attend and incorporate insights from that forum into their submissions. More information about the ISCCC's forum is available here: [Letter to NCA re Hume Circle Precinct and Initial Submission on draft amendment 102 - Inner South Canberra Community Council - ISCCC](#).

## **2 The ACT Government's strategic planning directions**

It is noted that DA102 acknowledges the objectives of the Planning Strategy 2018 (the Planning Strategy), the Inner South District Strategy (the District Strategy) and the East Lake Place Plan (the Place Plan), particularly in terms of the desire for increased housing in well located areas.

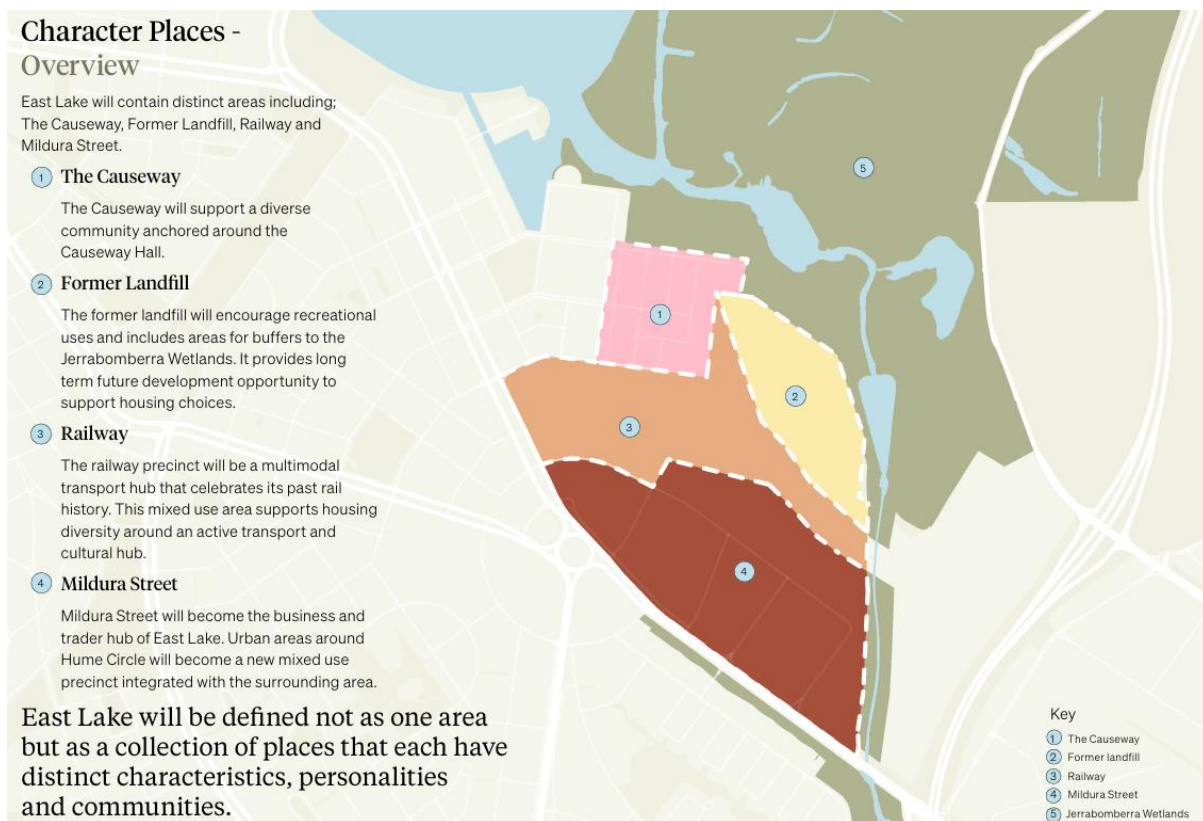
Notably, the District Strategy highlights East Lake, including Hume Circle, as a category 1 change area and key site. The Place Plan (which is further discussed in section 3.1 (East Lake Place Plan)) includes Hume Circle in its Mildura Street Precinct (Figure 1). The strategic vision for the Mildura Street Precinct is to become a hub of employment, business, innovation and community service – combining heritage and continued industrial uses and other diverse opportunities.

The TPA agrees that the amendment generally aligns with many of the strategic directions related to providing residential development opportunities within an existing urban area. This aligns with Strategic Direction 1.1 of the Planning Strategy and the goals of the District Strategy and Place Plan that seek to provide opportunities for adaptive reuse in the area.

However, the amendment challenges other strategic directions outlined in the Planning Strategy, particularly Element 2 which highlights the intention to provide a variety of services and economic activity in the right location. The strategic vision of the Mildura Street Precinct, as outlined in the East Lake Place Plan, should also be noted.

These challenges are discussed more in section 3.3.7 (impacts to commercial centres) and section 3.3.8 (impacts to employment land).

Figure 1 – East Lake Place Precincts



### 3 Impacts of the proposal

#### 3.1 The East Lake Place Plan

As the Background Report for DA102 notes, the ACT Government has undertaken significant strategic planning work in the East Lake area over a period of over 10 years. This led to the delivery of the East Lake Place Plan (the Place Plan) in 2024 which followed extensive community and stakeholder consultation, including with the NCA. The Place Plan (see Figure 2) includes land within the Hume Circle Precinct (Hume Circle – see Figure 3).

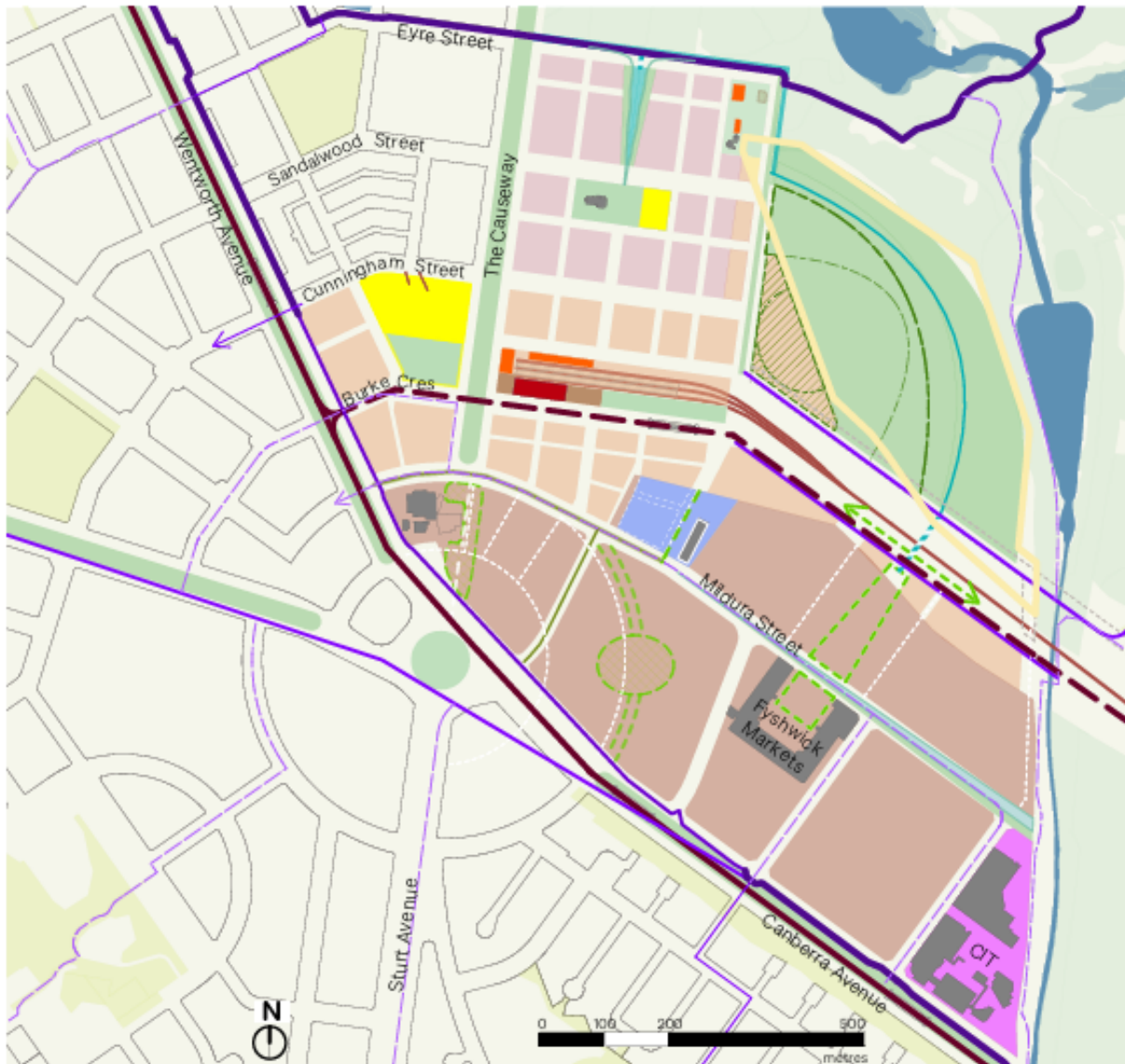
The TPA and Suburban Land Agency (SLA) are currently progressing studies to support future amendments to the Territory Plan that will deliver on the vision of the Place Plan.

The uplift proposed in DA102 (and other factors) will result in substantially greater residential yields than anticipated and considered through previous planning in the Place Plan (see section 3.2 (Building height and density) for further detail).

This will result in a significant increase in demand for community facilities, open space, infrastructure, utilities and commercial centres within the local area. This will, in many cases, require augmentation or additional facilities to service the proposed residents (see section 3.3 (Demand on infrastructure and services) for further detail).

Should DA102 proceed, the TPA strongly recommends close collaboration between the NCA, TPA and SLA to align the frameworks between the two proposals. The SLA’s submission (Attachment B) provides further detail on this.

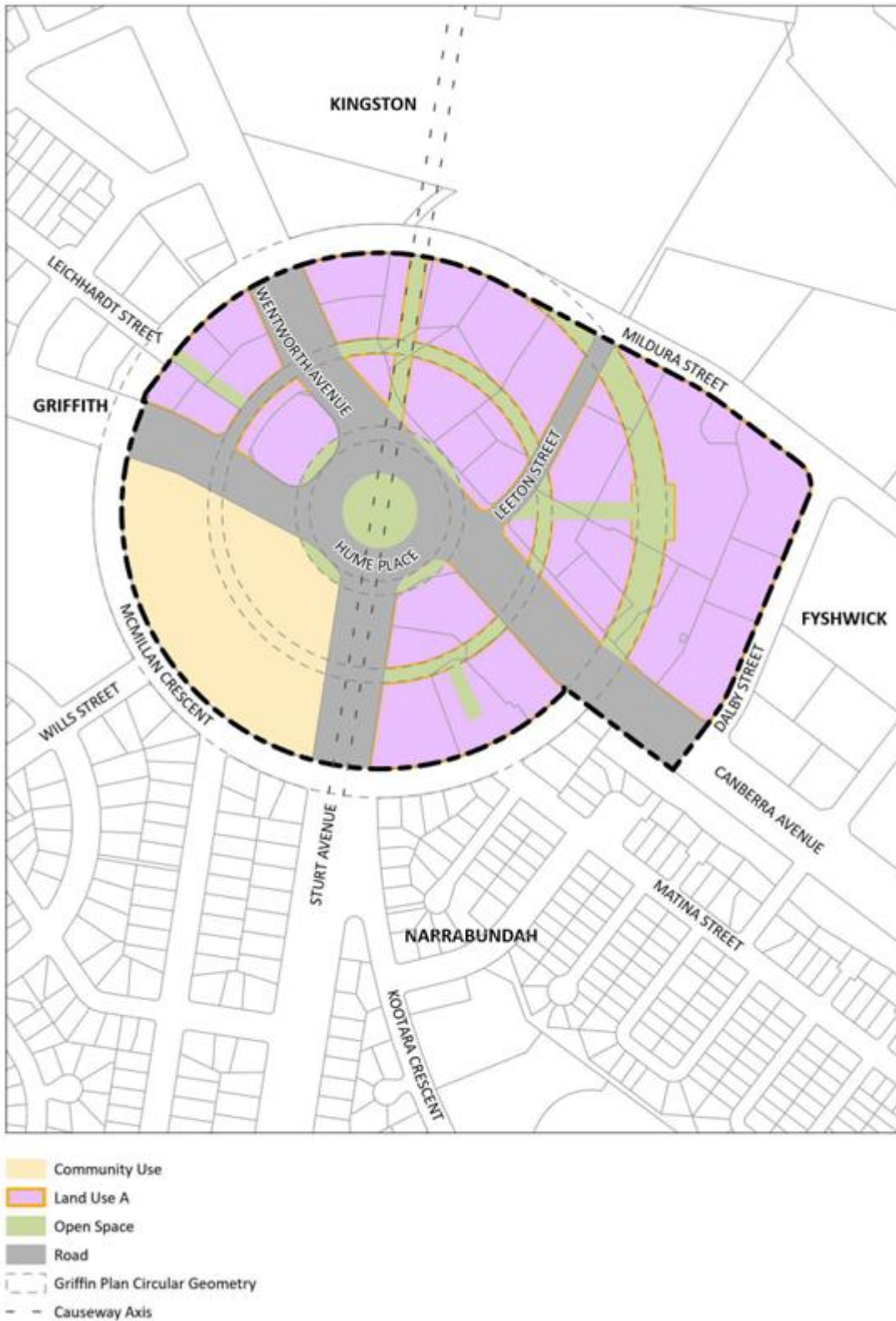
**Figure 2** – The East Lake Place Plan Area and urban design concept



**Community Facilities**

- Public building – Transport hub
- Cultural/Community – Rail Museum, heritage, Wetland Visitor & Cultural centre
- Education – early childhood and care; primary K-6
- Education – CIT – future Innovation precinct
- Community uses and associated spaces, supporting services. Further consultation with leaseholders is required.

Figure 3 – Hume Circle Area and proposed land uses



### 3.2 Building height and density

The building height and density proposed in DA102 is substantially higher than was considered in the Place Plan.

The recommendations in the Place Plan were made on relatively modest building heights and population estimates. The Place Plan anticipated variable heights in the Mildura Street Precinct, generally with 5-6 storeys on Hume Circle and increasing to around 8 storeys towards the Railway Precinct. The ACT Government estimates that this would lead to a yield of roughly 5,500 dwellings and a population of approximately 12,000.

While building heights can be considered through detailed design, the ACT Government estimates the uplift from DA102 (plus adjustments in the building heights that would need to be made in the Place Plan to provide a reasonable transition to/from the taller buildings), will result in these figures almost doubling – to approximately 10,500 dwellings and 23,000 residents).

It should be noted that the dwelling and population figures highlighted above are preliminary estimates only – these may be subject to change as concepts are developed further.

Based on current and projected populations, this revised residential density will far exceed that in all Town Centres. It would also mean this area would likely become the most densely populated precinct in the ACT.

### 3.3 Demand on infrastructure and services

The TPA considers that there has not been sufficient consideration on the demand on infrastructure and services that would result from the increased density proposed by DA102. Below provides a summary of the likely impacts.

#### 3.3.1 Schools

There is insufficient school capacity in surrounding public schools to service the population and density that would be generated by DA102. The East Lake Place Plan includes plans for a new primary school and early childhood education centre. However, as noted in section 3.1 and 3.2, this planning was based on significantly lower population estimates.

The revised population would likely result in the need for two separate primary schools with early childhood education centres plus (potentially) a high school. In other words, two schools in addition to what was planned in the Place Plan, may be required.

While these additional schools may be able to be facilitated in and/or around the Hume Circle and Place Plan area, this will require significant coordination between the NCA, TPA and SLA. Further, the TPA would require a condition be included in DA102 outlining

that funding contributions are required to deliver the additional public and offsite work (see section 3.3.9 (Public works) for more details).

### **3.3.2 Other social and civic infrastructure**

Like schools, the increased population estimates will increase demand on other social and civic infrastructure, including health facilities, sports and recreation facilities and open space. While the TPA notes these are largely included as permissible land uses for 'Land Use A' (Figure 3), noting these are held by private lessees and higher value land uses are also permitting, there is no guarantee these will be delivered in Hume Circle despite the increased community need.

Similar to schools above, these services may be able to be facilitated in and/or around the Hume Circle and Place Plan area. This will require significant coordination between the NCA, TPA and SLA. Further, the TPA would require a condition be included in DA102 outlining that funding contributions are required to deliver the additional public and offsite work (see section 3.3.9 (Public works) for more details).

### **3.3.3 Roads**

It is noted that DA102 anticipates that the Hume Circle roundabout will be examined to “support the importance of the gateway while also providing a safe and efficient through point with four key avenues feeding in and out of it” (section 2.2, DA102).

The Hume Circle intersection has experienced historically high crash rates making it one of the more complex traffic locations in the Territory. While DA102 indicates an intention to retain the circular form, any design must support improved safety outcomes for all users, particularly pedestrians and cyclists.

Canberra Avenue also serves as a key freight route, as identified in the District Strategy. Its ongoing functionality needs to be considered with potential conflicts and congestion pressures associated with new development. The DCPDD should include provisions that safeguard freight movement efficiency and ensure that local access arrangements, land-use interfaces and street designs do not compromise its role within the broader freight network.

Careful planning, analysis and collaboration between various areas of the ACT Government and the NCA will be required to balance these competing priorities and to identify a preferred intersection configuration. Noting this, the TPA recommends these requirements to be incorporated into the DA and/or the DCPDDs. Like above, the TPA would also require a condition be included in DA102 outlining that funding contributions are required to deliver these additional public and offsite work (see section 3.3.9 (Public works) for more details).

### 3.3.4 Active Travel

It is noted that pedestrian-prioritised connection and boulevard (section 4.19.5, DA102) are envisaged under the DCPDDs. In preparing these conditions, guidance can be drawn from the Place Plan which outlines several principles, strategies and implementation actions aimed at enhancing the public realm and promoting active travel throughout the area, while also strengthening connections between Hume Circle and surrounding established suburbs.

Active travel infrastructure will need to be upgraded or constructed to ensure safe and efficient movement between Hume Circle, the broader East Lake area and beyond – particularly in relation to future school sites.

As highlighted above, the existing roundabout configuration of Hume Circle does not support pedestrian movement to and from the area, which will be exacerbated with further densification. The TPA recommends, in addition to what is outlined in 3.3.3 above, that concept plans covering all modes of transport and traffic management at Hume Circle are established and are agreed (in-principle) before finalising the precinct's urban design solution. These should be prepared in consultation with agencies with the City and Environmental Directorate (CED) and SLA regarding impacts or inter-relationship with the Place Plan.

### 3.3.5 Parking

The additional residential density proposed in Hume Circle has the potential to lead to significant pressure on road infrastructure from excessive private vehicle usage. To encourage a shift to active travel and help limit these impacts, reduced on-site car parking should be considered. The TPA recommends that parking rates could be expressed as maximums rather than minimums. This approach is considered to align with the broader sustainability and mode-shift objectives of the DA.

The SLA's submission (Attachment B) provides further commentary about a proposed "car light" solution.

### 3.3.6 Utility infrastructure

It is the TPA's understanding that significant augmentation would be required to utility infrastructure to service the needs of the estimated increased population. The Territory is engaging the utility agencies (such as Icon Water and Evoenergy) to understand these impacts. Its strongly recommend that the NCA also consult with these agencies in progressing DA102.

As outlined in other parts above, the TPA would require a condition be included in DA102 outlining that funding contributions are required to deliver any additional public and offsite work, including augmentation of utility services (see section 3.3.9 (Public works) for more details).

### 3.3.7 Impacts to commercial centres

The ACT's hierarchy of centres organises commercial, retail and employment functions into a sequence – ordered generally by scale, role and catchment. The hierarchy is recognised across both the ACT planning system and in the NCP, and includes:

- The City Centre
- Town Centres
- Group Centres
- Local Centres

Ultimately, the hierarchy of centres supports a dispersed urban form of self-contained towns and neighbourhoods and efficiently spreads essential services.

As discussed in section 3.2, DA102 has the potential to deliver a level of residential density that far exceeds that in Town Centres with no requirement to provide commercial uses (as well as community facilities, recreational facilities or other urban services) to support the population.

The Place Plan includes proposals to support commercial functions within a mixed-use precinct. This intentionally provides for activity areas to service the population without competing directly with the surrounding commercial centres.

However, DA102 as presented does not provide similar intentions. Currently, there would be no guarantee commercial uses would be delivered – risking creation of a dormitory residential area which would subsequently place major pressure on existing commercial centres. Alternatively, if commercial development is not limited in Hume Circle, development of any scale could eventuate that competes with surrounding Group and Local Centres. This would be a significant step away from the established hierarchy of centres.

The TPA recommends revisions to DA102 be explored to cater for commercial uses but limit their impacts to the hierarchy of centres. This may include restrictions on the extent and scope of retail and office uses. The NCA should consider Assessment Requirement 77 in the Inner South District Policy or Assessment Outcome 5 of the Commercial Zones Policy.

### 3.3.8 Impacts to employment land

DA102 proposes land use changes that will impact and potentially result in a loss of employment land.

While the TPA have planned for change in the Hume Circle and Place Plan area for some time, this has included maintaining and limiting the impacts on the area's employment land, including by providing a transition to industrial land uses. These principles are outlined in the ACT Planning Strategy, Inner South District Strategy and in the Mildura

Street Precinct of the East Lake Place Plan (also see section 2 (ACT Government's strategic planning direction)).

Without appropriate requirements in DA102, the ability to maintain adequate employment land in the Mildura Street Precinct and provide appropriate transition to industrial uses will be limited.

The TPA recommends the NCA consider including provisions, such as buffer areas and the inclusion of low-impact enterprise uses (e.g. innovative light industrial uses) in strategic locations to mitigate interface impacts and assist in the transition between mixed use and industrial land.

### 3.3.9 Public works

As outlined above, to deliver the development envisaged in this precinct, significant investment would be required in a range of infrastructure and services. The TPA recommends should DA102 proceed that a condition be incorporated into the NCP or DCPDD to address the delivery of these works, particularly where these are offsite and/or on Territory Land. This condition must ensure that any offsite works required as a consequence of future development, including roads, utilities and other supporting infrastructure, are funded and delivered by the relevant developers. This includes provisions for social and community infrastructure needs arising from the development.

A comparable approach is already established in the Barton Precinct Code, which includes provisions requiring new development to implement public domain works and site infrastructure concurrently with adjoining development. For reference, the Barton Precinct Code includes the following requirement:

#### *4.4.5 Detailed Conditions of Planning, Design and Development*

*General: Offsite works, Public domain works and site infrastructure should be implemented concurrently with new adjoining development. New developments may be required to provide public infrastructure, including adjacent access roads and landscaped public spaces such as Windsor Walk, in accordance with detailed development requirements set by the National Capital Authority.*

The TPA considers that adopting a similar condition would provide clarity, ensure equitable allocation of infrastructure costs, and support the coordinated delivery of essential works on Territory Land.

## **4 Areas included in DA102**

The following should be considered regarding the extent and location of land proposed to become Designated Areas.

#### 4.1 Inner South District Strategy

It should be noted that parts of the precinct included in DA102 – south of Wentworth and Canberra avenues are outside of the key sites and changes areas identified in the Inner South District Strategy. This means that change has not been anticipated across the entire area – and this DA is the first indication that change may be possible.

#### 4.2 Community comments

As outlined in section 1, petition 005-26 requests reconsideration of the extent of the proposed designated area, particularly regarding residential apartments in the south of the precinct.

#### 4.3 The Causeway

The proposal to extend the Causeway axis through to Hume Circle is an important initiative, however, DA102 currently shows this extension as a narrow boulevard. The TPA recommends this be increased to match the width of the surrounding main avenues – reflecting the axis' importance in Canberra's layout. Further comments on this are also provided in the SLA submission (Attachment B).

#### 4.4 Existing blocks – split zoning, roads and open space

The TPA notes that many of the impacted sites are already developed and leased sites are recently developed and/or the block configuration would make the practical realisation of some of the amendment's goals difficult. This includes:

- Blocks 14 and 15 Section 25 Griffith – currently, the proposal appears to be for these blocks to have split zoning between Designated Area and Territory Land. To simplify implementation and delivery of any future development on these blocks, the TPA's strong preference is for no blocks to be split between designated area and Territory Land.
- Open space across the existing blocks in Sections 25 and 84 Griffith and Sections 6 and 26 Fyshwick – it is questioned how open space on these developed and privately leased sites could be successfully delivered and thereby achieve the full 'circle' envisaged in DA102 (Figure 3). It is also not clear how these areas are intended to be owned and maintained. Specifically, it is not clear whether it is intended these will remain within lease boundaries (potentially requiring a right of access arrangement for pedestrian movement) or whether it is intended that the land be acquired.
- The extension of Mildura Street/Leichhardt Street/McMillian Crescent – DA102 shows this extension traversing Block 15 Section 25 Griffith, which is currently occupied by recently redeveloped residential development (Figure 4). It is questioned if this could reasonably be delivered without land acquisition.

- Parts of Canberra Avenue highlighted as Land Use A – As highlighted in Figure 5, Land Use A extends into parts of the Canberra Avenue road reserve. It is not clear if this is intentional, however, if so, delivery of development in these areas would require partial road closures and lessee/s of adjoining land to apply for a direct sale.

Figure 4 – Mildura Street/Leichhardt Street/McMillian Crescent road extension

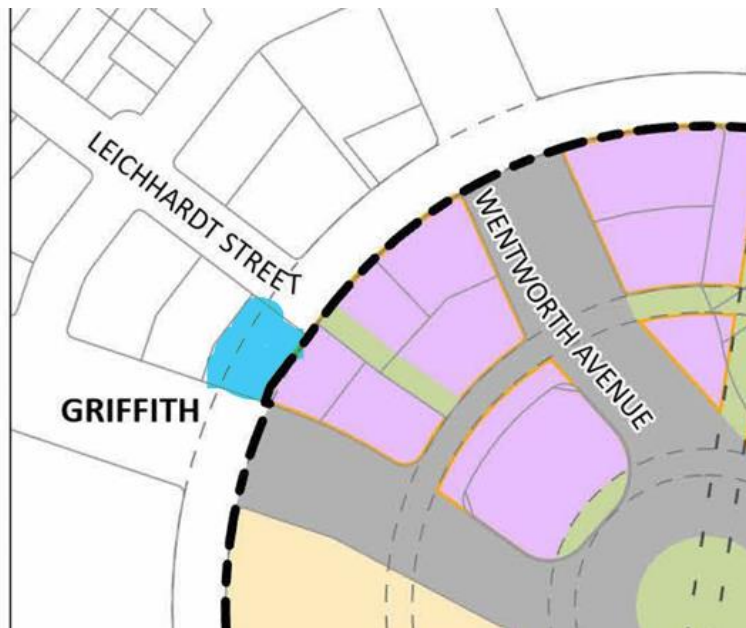
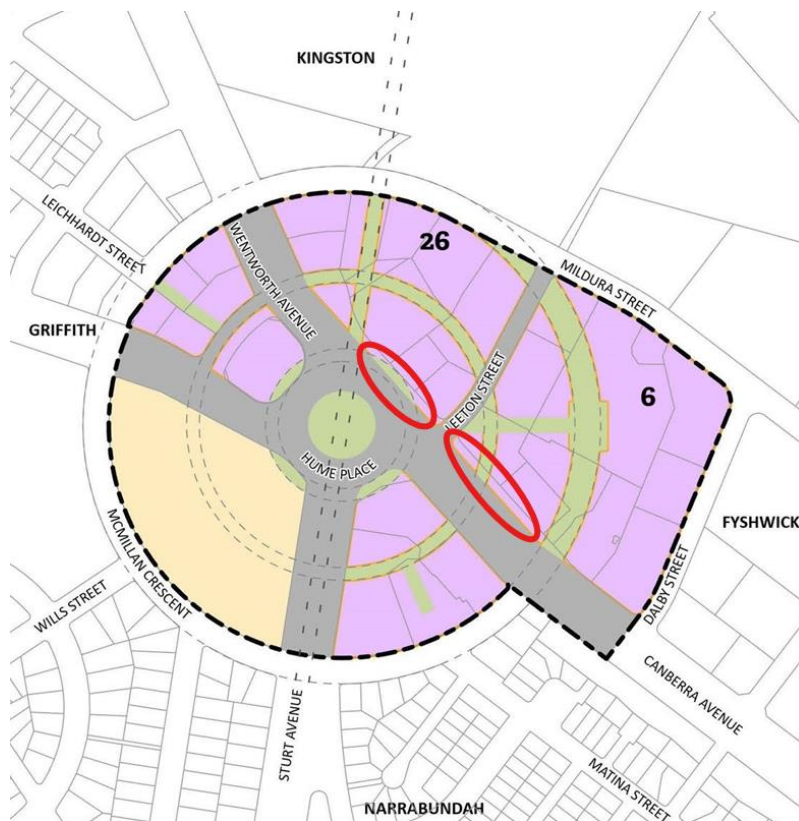


Figure 5 – Land Use A within the Canberra Avenue road reserve



## 5 Other considerations for future development

Building on the matters to be included in the DCPDD as outlined in DA102, the TPA suggests the following should also be considered in guiding the ongoing development in Hume Circle.

### 5.1 Open spaces and tree canopy

The DCPDD should provide greater clarity on open space, tree canopy coverage and permeable surface. It is recommended that DA-102 require a minimum area for usable parkland and open space. The SLA's submission (Attachment B) provides further detail, including suggestions regarding the delivery of formal avenues and multiple rows of canopy trees.

### 5.2 Heritage

The ACT Heritage Council acknowledged that the heritage place 'Dairy Farmers Cooperative' is appropriately incorporated into DA102 within the Hume Circle Precinct.

### 5.3 Contamination

The majority of land within the Hume Circle Precinct is currently zoned IZ2 Industrial Mixed Use with several sites recorded on the Environment Protection Authority's (EPA) contaminated sites database and geographic information system as potentially contaminated. DA102 indicates this area will be permitted to be used for sensitive uses following the dedication of the land as a Designated Area.

All remedial works by a developer would need to be undertaken if land is contaminated.

The TPA suggests contamination is included in the DCPDD. In accordance with ACT Contaminated Sites Environment Protection Policy 2017, the EPA suggests that:

*A consultant's assessment report into the site's suitability for the proposed and permitted uses from a contamination perspective and a letter of introduction from the land custodian and/or person/company responsible for commissioning the report detailing the purpose of the report and the action being requested from the EPA must be submitted to the EPA, in accordance with Information Sheet 11 – Environment Protection Authority Report Submission Requirements, for review and endorsement by the EPA prior to the site being used for other purposes.*

### 5.4 Built form - assessment

It is not clear how the design of the built form in the Precinct would be guided. Noting the likely density, the TPA highly recommends adopting significant portions of (or all of) the ACT's Urban Design Guide and Housing Design Guide.

**Hume Circle - Draft Amendment 102  
SLA submission - January 2026**

SLA has provided comments on NCA's Hume Circle Draft Amendment 102 for Hume Circle and understands that this will be followed by Detailed Conditions of Planning Design and Development. SLA supports NCA's ambition to enhance national significance of Hume Circle Precinct by ensuring that:

1. The precinct is developed as a high-quality urban node and gateway to the Central National Area.
2. Building massing and form appropriately respond to the Griffin geometry of and surrounding Hume Circle.
3. The symbolic importance of Canberra Avenue as a Main Avenue and its function as a key access corridor to the city is protected and supported through high quality design in architecture, landscape, and public realm.

In light of the importance of this location and the Territory's interest in planning, design and development of land in around the precinct, SLA would like to collaborate with the NCA in its endeavour to make Hume Circle Precinct an exemplar urban regeneration project encompassing the restoration/reinterpretation of Griffins' geometry and the realisation of Hume Circle as a vibrant people place.

SLA is responsible for leading an expansive development program that spans large-scale civil and infrastructure initiatives and exemplar urban regeneration and renewal.

Outside of the City, SLA is responsible for delivering the government's Indicative Land Release Program (ILRP) including land for residential, commercial, industrial and community uses. SLA is well placed to support this city building project and assist in collaborating with other ACT Government agencies to transform Hume Circle and surrounds from being a car dominated and unsafe environment to a humanised and pedestrian accessible place.

This can potentially unlock Territory Land to accommodate significant urban development and deliver multiple public benefits.

**Canberra Railway Precinct urban renewal**

The Hume Circle Precinct and the adjacent Railway Station Precinct includes multiple landowners with Jega and the Territory having significant holdings. The SLA has just recently been successful under Commonwealth Urban Precincts and Partnership Program, receiving \$2.8m to undertake planning and delivery of Canberra Railway Precinct Urban Renewal, with matching funding to be provided by the SLA over the life of the project.

The project is for urban infill and renewal of the Canberra Railway Precinct. The project will design:

- to construction and approval ready a multimodal transport hub;
- to construction and approval ready the subdivision layout, services and infrastructure that will support residential and commercial mixed use to accommodate up to 5,000 new housing units and 1,284 new jobs;

- to construction and approval ready recreation, community and cultural facilities on the former landfill site, and:
- a strategy for integration of the railway lands and former landfill site with Mildura Street, the Causeway and related areas as a place of purpose.

### **Hume Circle & Railway Precinct - integrated urban renewal**

While the NCA proposal in its current form aligns with the ACT Government objectives for housing in a prime infill location, there are several matters for consideration with the proposal in its current form, including in relation to the wider East Lake and Railway Station precinct. The Land use and Building Height provisions need to recognise the broader precinct and include provisions that don't preclude land uses that contribute to the realisation of Hume Circle as an urban centre in its own right.

The combination of recent NCA proposals for Hume Circle, uplifts in yield in the Causeway in the ILRP in addition to the Railway Precinct will deliver substantially greater residential and employment yields than that anticipated by the previously released East Lake Place Plan. There will therefore be a consequent increase in demand for community facilities, open space, utilities and other infrastructure, and critical interdependencies between precincts.

Due to this and the aspiration for an exemplar urban regeneration project it is recommended that a shared vision and a coherent policy framework with a 'one plan' approach be developed to form the basis of Detailed Conditions of Planning Design and Development .

Such an approach needs to be underpinned by comprehensive objectives and strategies including:

- Land use
- Transport – public transport and active travel, vehicle access and parking
- Water systems
- Caring for Country
- Public domain – quality public parks and streets, walkable urban structure, provision standards
- Ecology and environmental sustainability – landscape and urban canopy
- Heritage
- Employment – innovation precinct, creative industries and existing industrial uses
- Contamination and rehabilitation
- Utilities
- Design excellence
- Education, public and community facilities
- Funding for community facilities, infrastructure and public domain upgrades
- Diverse neighbourhoods and affordable housing
- Night-time economy
- Retail
- Building robustness, height, layout and design and wind effects

This 'one plan' approach needs to be supported by:

- Additional traffic modelling (which has been requested for East Lake), prior to the consideration of the NCA proposal, and this work should be integrated with traffic modelling for potential Hume Circle options. The SLA and City Services area of CED are collaborating on updating modelling to include a range of possible scenarios and assessment of impacts of the transport network.
- The consideration of safety and active travel around Hume Circle. The images as shown in the NCA proposal do not demonstrate a significant improvement on the current sub optimal situation.
- Consideration of opportunities to create a vibrant urban place and unlock underutilised developable land surrounding the circle. To this point, it is important that the ACT Government with NCA develop a wider integrated transport and urban design framework within which the area covered by proposal sits.
- Broader integration with surrounding uses informed by strategic and more detailed planning, particularly the interface issues with the industrial area which are valued in the District Strategy and East Lake Place Plan. There is potential to retain GFA for commercial and employment uses in association with residential uses and address interface issues with industrial lands.
- Required community facilities such as schools and sports and recreational facilities that would need to be provided within Hume Circle and the broader precinct.
- Required upgrades of the road network and infrastructure in and around Hume Circle, triggered by the NCA proposal and other potential developments, which will require significant improvements to be undertaken by the Territory and contemplated in future budgets.
- An integrated urban development plan which provides for coordinated development staging and infrastructure/public domain upgrade sequence across the precinct.

### **Reinstatement of Griffin geometry**

SLA supports the reinstatement of the radial geometry of the Griffin Plan including the axial streets particularly the main avenue axes. However, the Draft Amendment is selective in this reinstatement and risks Hume Circle remaining as a traffic dominated space with an unsafe intersection. As depicted in the Draft Amendment it would not deliver an outcome that is consistent with Griffin objectives and principles or the aspiration to realise Hume Circle as a 'place' with high quality public domain.

The current roadway condition of Hume Circle does not conform to this geometry. Critically Griffin's axial lines and main avenue aligned to the centre of the circle and intersected with the circular roadway at 90 degrees (normal). Instead, Canberra Avenue and Wentworth Avenue are currently diverted away from the centre of the circle and intersect with the circle at acute and obtuse angles which encourages high speed traffic to enter and leave the existing roundabout and creates unsafe conditions for pedestrians or cyclists to cross or navigate the intersection. The unsafe pedestrian environment is further compounded by not having signalised crossings.

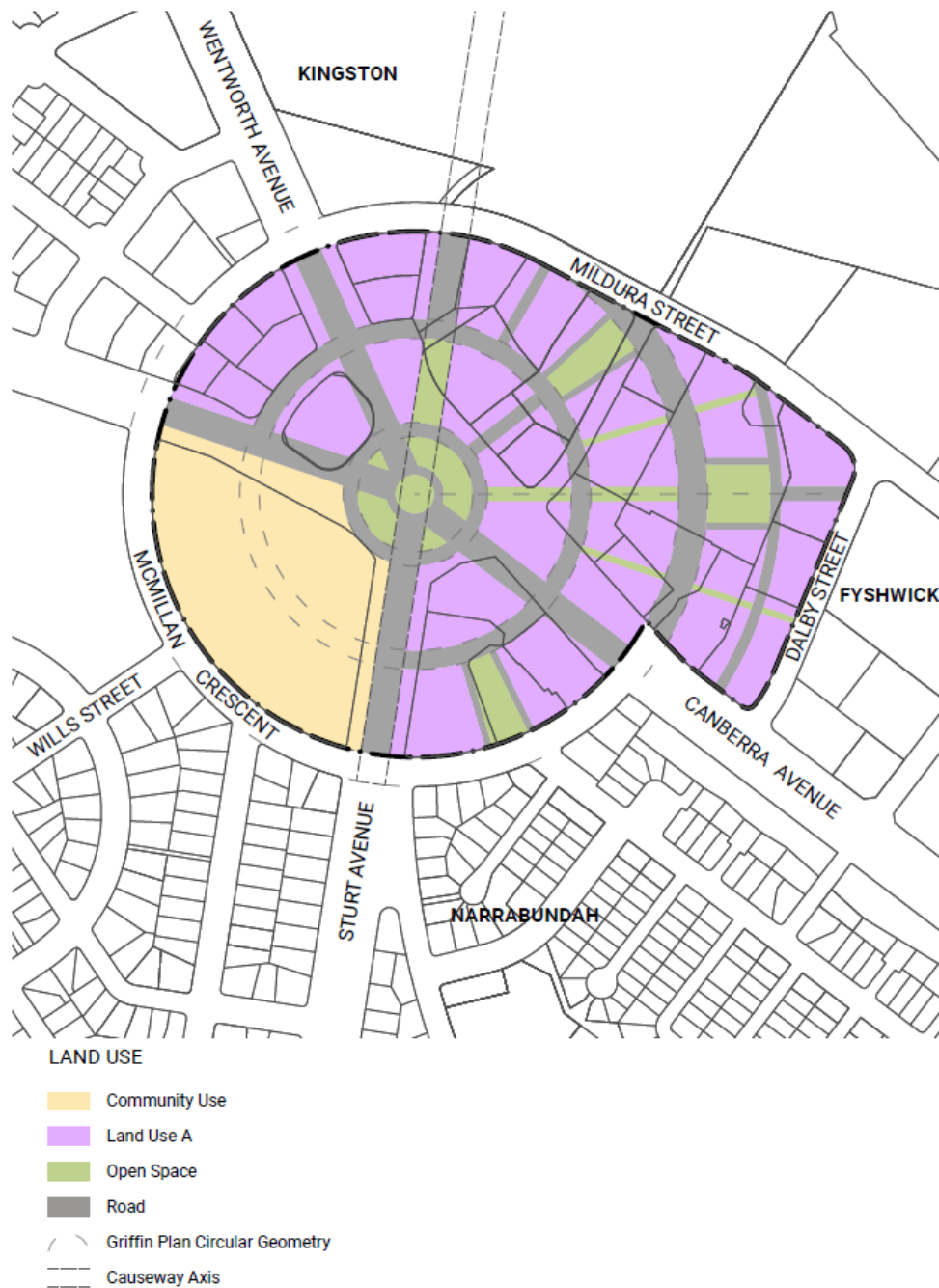
In order to deliver the Griffin geometry and deliver a safer and appealing pedestrian environment SLA believes that further investigation of the feasibility of delivering the main avenue axes aligning with the centre point of Hume Circle is required. One option would be for the main avenues to compress down from their 60 metre width to 30 or 40 metre width between McMillan Crescent and Hume Circle in combination with adjusting property boundaries and enhancing Hume Circle as a signalised roundabout and landscaped place. This would be consistent with Griffin principles and is similar to how Griffin compressed the main avenues

between City Hill (Vernon Circle) and London Circuit in the 1918 Plan. It would also reduce crossing distances for pedestrians and desirably increase the sense of enclosure of Hume Circle.

The proposal to extend the Causeway axis through to Hume Circle is an important initiative however it is currently shown narrow, and needs to be increased in width to a minimum of 30m to give it the same width to the other main avenues and a presence and hierarchy worthy of this axis within Canberra's layout.

Adopting such an approach would unlock high value land for urban development which would support a business case to upgrade the public domain of Hume Circle and to create a safer active travel and vehicular environment.

It is recommended that the Land Use plan (Figure 146) be replaced with a plan similar to the plan below;



### Building height

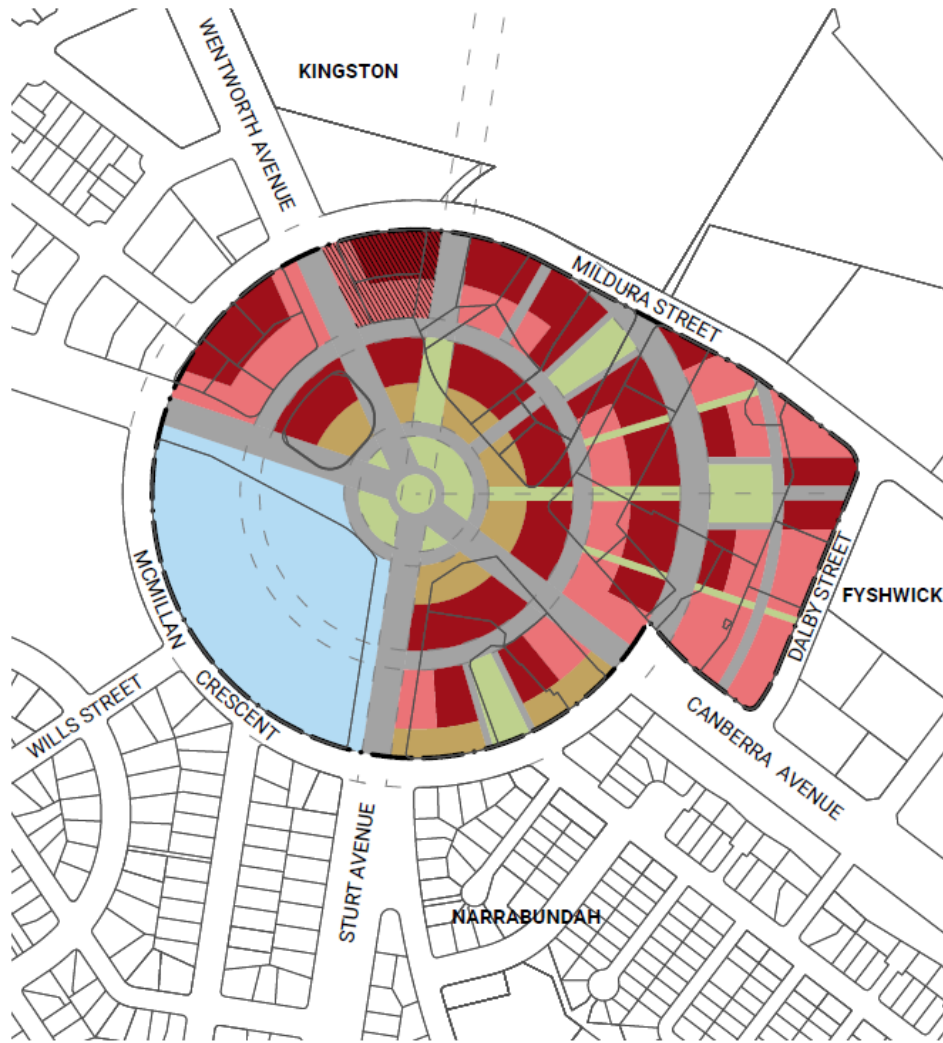
The logic behind the Building height framework does not appear to be based on best practice urban design principles. It will have the consequence of concentrating tall buildings to an outer ring mostly on the north eastern segment due to existing redeveloped and unit titled development between Canberra Avenue and Wentworth Avenue (which will unlikely change) and Canberra Avenue and Jerrabomberra Ave in Narrabundah. Such an approach favours the Jega Consortia rather than an approach which more equitably distributes higher buildings across Hume Circle and broader East Lake. A preferred approach would be to adopt the following building height principles to underpin a building height strategy to ensure that:

- Taller buildings are used to reinforce the Griffin geometry

- Building heights responds to the structure of the public domain, the hierarchy of spaces and desired activation, overshadowing and the creation of a varied and interesting skyline
- Taller buildings are slender and are distributed with spacing that ensures optimal sunlight into the public domain and deliberate view corridors to the broader landscape.
- Buildings above 8 storeys have an optimal maximum footprint of 700sqm (gross) to promote slender forms – preventing a ‘wall’ of built form and with regular opportunities for sunlight, breezes and blue sky between.
- A general street wall of 4 to 8 storeys is created across the centre with taller elements of between 12 and 15 storeys distributed to key locations such as corners and park or plaza frontages
- Each section has a predominant height of 4-8 storeys with a careful placement of taller buildings of between 8 and 15 storeys to achieve a differentiated urban form, varied skyline, dwelling diversity and to avoid a wall of tall buildings and repetition
- Taller buildings engage with the street and public spaces to ensure building entries and cores are visible from the street with good public surveillance
- Taller buildings above 25m do not cause significant wind impacts on the public domain through down draft or turbulence.

It is recommended that Draft Amendment:

- include these building height principles
- adopt more responsive building height provisions (to replace Figure 147) as illustrated below:



**MAXIMUM BUILDING HEIGHTS**

- |  |   |
|--|---|
| <span style="display: inline-block; width: 15px; height: 15px; background-color: #800000; border: 1px solid black;"></span> 12-15 storeys (RL617)  | <span style="display: inline-block; width: 15px; height: 15px; background-color: #90EE90; border: 1px solid black;"></span> Open Space                                |
| <span style="display: inline-block; width: 15px; height: 15px; background-color: #FF6347; border: 1px solid black;"></span> 8-12 storeys   | <span style="display: inline-block; width: 15px; height: 15px; background-color: #808080; border: 1px solid black;"></span> Road                                      |
| <span style="display: inline-block; width: 15px; height: 15px; background-color: #D2B48C; border: 1px solid black;"></span> 4-8 storeys  | <span style="display: inline-block; width: 15px; height: 15px; border-top: 1px dashed black; border-bottom: 1px dashed black;"></span> Griffin Plan Circular Geometry |
| <span style="display: inline-block; width: 15px; height: 15px; background-color: #ADD8E6; border: 1px solid black;"></span> St Clare's College   | <span style="display: inline-block; width: 15px; height: 15px; border-top: 1px dashed black; border-bottom: 1px dashed black;"></span> Causeway Axis                  |
| <span style="display: inline-block; width: 15px; height: 15px; border-left: 1px solid black; border-right: 1px solid black; border-bottom: 1px solid black;"></span> Site subject to CMP |   |

An illustrative plan below shows a possible interpretation of the recommended building height principles and plan with formal avenues and multiple rows of canopy trees



ILLUSTRATIVE PLAN

 4-6 storey residential	 Street
 8 storey residential	 Park
 12-15 storey residential	 Plaza
 Ground floor retail	 Mature Trees
 6 storey commercial	
 9 storey commercial	

### Land use

The scale of urban renewal proposed at Hume Circle, Kingston Railway Precinct and broader East Lake is similar in scale to other urban renewal projects in Australia and internationally such as Green Square Town Centre in Sydney, Arden in Melbourne and King Cross in London. These projects have had a deliberate approach with policy settings that facilitate their realisation to become significant urban centres and innovation precincts with diverse land use (including community and cultural uses) and high quality public domain.

The broad range of uses proposed for Hume Circle is supported however an approach which favours the retention and increase of low impact enterprise so that Hume Circle can emerge as an innovation precinct with active ground floors in key locations is recommended. Such an

approach would avoid Hume Circle precinct becoming a dormitory residential precinct due to the propensity for highest and best use (which would be residential). The approach taken in the Brisbane Productive City Strategy is a relevant precedent which provides for urban renewal in conjunction with growth in knowledge-based innovation precincts in underutilised high value industrial precincts within proximity to the City Centre.

Given the shortage of industrial land in the ACT, the strategic location of Hume Circle and broader East Lake in proximity to Kingston Railway Station (with interchange with future light rail) and Canberra International Airport and the need to diversify the economy there is a strong case to encourage more enterprise and private sector growth.

To achieve the aspiration for an exemplar urban renewal project with greater opportunities to live and work in the precinct, with high quality public domain and reduced car dependence the precinct should also be a 'car light' with lower car trip generation, reduced on site parking rates (with maximum parking rates prescribed) similar to the approach taken at Campbell 5 and to that proposed at North Curtin.

It is recommended that:

- the range of permissible uses be broadened to include low impact enterprise, innovation and light industrial uses;
- Hume Circle be identified as an urban centre with significant employment, retail and civic uses that serve the inner south and greater Canberra; and
- A 'car light' approach be taken with reduced on-site parking requirements expressed as a maximum provision standard.

### **Open space and public domain**

The land use plan does not appear to propose sufficient open space and public domain to cater for the needs of this new high-density community. The land use plan categorises many of the new streets, some of which are critical to ensuring car and service/waste access to sites with open space zoning.

In the absence of open space provision standards in the ACT a typical best-practice approach would require the delivery of a minimum of 15% of the precinct to be useable parks and 30% to be streets. Central Melbourne has higher provision than this and City of Sydney has approximately 16% of the City as open space/parks. Central Melbourne has approximately 45% of land area as public domain and comprising 30% streets and lanes and 15% parks. (EDAW, Jumeirah Gardens Public Realm – Unpublished, 2008)

The NSW State Government's Recreation and Open Space Planning Guidelines for Local Government. (Department of Planning 2010), provide default standards for open space planning in NSW. These include 9% of site area for local and district level open space provision and 15% of site area including regional open space provision which equates to 24% of land area. City of Sydney, [Open space, sport and recreation needs study 2016 - City of Sydney](#)

In light of Hume Circle's proximity to Lake Burley Griffin Parklands a similar approach to the NSW Government's Recreation and Open Space Planning Guidelines.

It is recommended that the Amendment require 9% of Hume Circle be useable park land and 30% to be streets – making clear distinction between them in the land-use plan. It should be noted that SLA suggested land use plan shown in this submission delivers approximately 9% local open space and 30% streets.

**Land ownership and delivery models**

Hume Circle revitalisation which seeks to re-instate elements of Griffin's 1918 Plan as a means to reinforce national significance, potentially delivering major economic benefit and a compelling and renewed vision of Canberra looking out to 2050 and beyond.

It is a significant city building undertaking, where orderly development requires best practice and collaborative governance to ensure coordinated land development and public domain and infrastructure enhancement.

Partnership with the NCA is essential to the successful transformation of the Hume Circle, if its role as the responsible planning agency is expanded as proposed.

While Jega Consortia has ownership of a high proportion of existing privately leased land within the Hume Circle precinct there is also a significant proportion of land that is unleased Territory land which would be substantially increased with the proposed adjustments to existing road reserves. This would unlock substantial land (and public value) that could be independently developed or assembled with adjoining blocks to create larger development parcels.

Under existing legislation the SLA is well placed to act as an 'new urbanising' agent to coordinate and facilitate orderly larger scale redevelopment and urban improvement where the private sector does not have the capacity to bring about optimal redevelopment that maximises public benefit.

Working in partnership with NCA, SLA has the ability to assemble sites, design and construct enabling infrastructure, prepare master plans, partner with private sector and in some instances establish special purpose vehicles as the means to finance and deliver coordinated urban renewal. In this way with its ability to plan, broker, coordinate and communicate redevelopment efforts, the SLA could drive urban transformation. It would involve working closely with existing property owners, businesses, development industry and community.

SLA looks forward to talking with you further on the opportunity to collaborate with NCA in its endeavour to make Hume Circle Precinct an exemplar urban regeneration project.



# CATHOLIC EDUCATION

Archdiocese of Canberra & Goulburn

Record No: R726257  
Container No:2025/40-005

Ms Karen Doran PSM  
Chief Executive  
National Capital Authority  
Treasury Building  
King Edward Terrace  
Parkes ACT 2600  
[sandy.jacobson@nca.gov.au](mailto:sandy.jacobson@nca.gov.au)  
[draft.amendment@nca.gov.au](mailto:draft.amendment@nca.gov.au)

Dear Ms Doran

## **DRAFT AMENDMENT 102 – Hume Circle Precinct**

I am writing with regard to correspondence from the National Capital Authority (NCA) to the Principal of St Clare's College, dated 6 January 2026 (REF:596056), our letter in reply of 28 January and our subsequent meeting with you on 5 February 2026, and my understanding of what we discussed at that meeting.

Our main concerns remain regarding development and approvals for St Clare's College and the implications of the proposals on traffic flow, pedestrian safety and the safety of our school community under the proposed NCA draft amendment.

**Development Approvals:** The NCA draft amendment was silent on the issue of continuing exempt development under the NCA Works Approval. I understand from our meeting on 5 February 2026 that the NCA is proposing that a works approval list can be agreed upon between the NCA and CECG, negating the need to go to the NCA for certain tasks. This approach has been put in place with the NCA and other educational institutions such as the Australian National University and the Australian Institute of Sport.

It was agreed that Andrew Wright, NCA Chief Planner would meet with Graham Beaver, CECG Group Infrastructure and Facilities Manager to discuss this approach. Graham can be contacted at [graham.beaver@cg.catholic.edu.au](mailto:graham.beaver@cg.catholic.edu.au) and 0439 143 097.

The question still remains regarding development approvals at the College, and we would welcome clarity and your reply on this matter. Added regulations would add unnecessary costs and delay. We propose that St Clare's College continues to be treated as it is under the current ACT exempt approval and seek your advice as to how this can be achieved.

**Traffic flow and Pedestrian Safety.** It was acknowledged by NCA in the meeting that the current road safety enhancement, funded by the ACT Government, of a signalised pedestrian crossing on Canberra Avenue would still progress and that it could prove to be an inadequate measure given the likely nature of future developments under the draft amendment. Planning from the NCA would include assessment and implementation of enhanced road safety measures surrounding the two

surrounding the two campuses of St Clare's College and St Edmund's College, including the well-known and long running issues of McMillan Avenue. We would appreciate more detail on this matter so that assurances can be provided to the schools and the community. We look forward to receiving your advice.

Thank you for the subsequent information sent to CECG regarding the classifications of permitted land uses for 'Land Use A'. We remain interested in the development of those permitted uses and request to be kept informed as they will affect the running of a healthy school environment.

If you or your staff have any questions, please contact Jane Kilmartin, Head of Government Relations 0400 380925 or via email at [jane.kilmartin@cg.catholic.edu.au](mailto:jane.kilmartin@cg.catholic.edu.au).

I look forward to receiving your reply.

Yours sincerely



David de Carvalho  
**EXECUTIVE DIRECTOR**

19 February 2026

cc. Principal of St. Clare's College [Ann.Cleary@stcc.act.edu.au](mailto:Ann.Cleary@stcc.act.edu.au)

27 February 2026

Chief Planner  
National Capital Authority  
GPO Box 373  
CANBERRA ACT 2601

**By email only: [draft.amendment@nca.gov.au](mailto:draft.amendment@nca.gov.au)**

### **Draft Amendment 102 – Hume Circle**

Thank you for the opportunity to make a submission on the *Draft Amendment 102 – Hume Circle*. With Canberra’s population expected to reach 700,000 by 2050, the need for more housing continues to grow. Utilising existing urban sites, such as Hume Circle, for urban infill development, is a sensible and comprehensive way to address the competitive tension between urban infill and greenfield sites. Our submission draws on industry experience, previous strategic work, and the lived experience of our members and stakeholders.

We support the Draft Amendment and consider it to be a sensible, measured and strategic response to the future of the Hume Circle Precinct.

### **About the Property Council**

The Property Council of Australia is the leading advocate and biggest employer for the nation’s largest industry. In the ACT, the property sector continues to account directly for more than \$4.5 billion in economic activity, a further \$2.1 billion indirectly, and one in seven jobs.

Property is the beating heart of the ACT’s success across all measures – with almost 45 per cent of tax and royalty revenue being contributed by the sector. The continued success of Canberra depends on the success of property, development, and the built environment.

Members of the ACT & Capital Region Division of the Property Council include the people and companies who plan, design, invest, own, manage, support, and build, the homes for Canberrans. We are committed to great cities, strong economies, and sustainable communities.

### **Context**

Hume Circle has long been identified as a planned urban element within the City of Canberra. The original 1913 Preliminary Plan for Canberra earmarked the Hume Circle area as urban in character,

and we note previous statements from the National Capital Authority (NCA) that Hume Circle was not intended to be a permanent low-scale industrial area. Adjacent to Hume Circle, the ACT Government has slowly progressed the East Lake area (first identified in 2004), so it is important to recognise that this proposed amendment is not being done in isolation. Rather, it is part of over two-decades of planning and discussion on the Inner South / East Lake area.

The benefits of strategic urban infill are well known and understood. In 2024, the Property Council ACT & Capital Region commissioned a report – *Unlocking 60,000 Homes: The Case for Updating ACT's Residential Zones*, which outlined the need for, and the benefits, of reviewing the existing zones and facilitating the development of more housing across the Territory.

Hume Circle is well-located, accessible and logical for change.

It sits at a major gateway to the National Capital, close to key arterial roads, existing and future public transport corridor, employment areas and services. As outlined above, from a strategic planning perspective, this is precisely the type of location where more flexible zoning and land-use settings make sense.

The proposed amendment appropriately recognises the precinct's national significance as an eastern approach to Canberra, its proximity to employment and transport infrastructure, and its potential to contribute to broader housing supply and urban renewal objectives without expanding the urban footprint.

It is important to be clear about the nature and impact of Draft Amendment 102. This amendment changes zoning and planning controls only. It does not approve development, require redevelopment, or compel landowners to act. Any future development will only occur if landowners choose to pursue (meaning it will need to be feasible), applications are lodged. In other words, this amendment is enabling rather than directive. It provides options and flexibility, not obligation. This distinction is important for community understanding and confidence.

The Property Council ACT & Capital Region continues to advocate for housing supply to be delivered in locations that are close to transport, services, and jobs. Hume Circle meets this criteria. Enabling redevelopment in well-located, inner precincts, makes better use of existing infrastructure, supports sustainable travel and living patterns, and keeps Canberra as a compact city.

Any amendments must provide the industry with clarity and certainty. This is important for investors, developers, and the community. Certainty around what may occur is critical, even if that proposal is many years away. Draft Amendment 102 strikes the right balance because it establishes a clear strategic direction for the precinct, and ensures that any future proposals remain subject to assessment and public consultation, with detailed design and development controls to be considered in the future.

## Height Limits

The one area which the Draft Amendment could be improved is by reviewing the height limits to unlock greater development potential and housing supply. The areas marked for rezoning are, as outlined above, part of a gateway in to Canberra, in a well-located and easily accessible area. Therefore, any redevelopment should maximise the opportunities available to deliver a variety of quality housing. Reviewing height limits, particularly around the maximum height in the National Capital Authority designed area of RL617, is recommended.

## Summary

We support the Draft Amendment. We strongly recommend that to improve the current proposals and enable more housing delivery, the NCA should consider reviewing the restrictions imposed on the height limits to maximise potential housing delivery. If we are to meet our housing targets, we must enable more urban infill in well-located precincts, like Hume Circle. The Hume Circle Precinct is well-located, accessible and appropriate for residential zoning. This amendment allows change to occur where it makes sense, without forcing it where it does not.

Zoning reform alone does not deliver development. But without it, development cannot occur. Draft Amendment 102 provides the necessary foundation for future housing and urban renewal outcomes while preserving choice for landowners and maintaining robust assessment processes.

The Property Council looks forward to continuing to work constructively with the National Capital Authority and the ACT Government as the precinct evolves over time. I would be happy to discuss this with you further if you have any queries. I may be contacted on 0421 871 469 or via [aberry@propertycouncil.com.au](mailto:aberry@propertycouncil.com.au).

Regards,



Ashlee Berry  
ACT & Capital Region Executive Director  
Property Council of Australia

# Living Streets Canberra



## National Capital Plan Draft Amendment 102: Hume Circle Precinct

**SUBMISSION FROM LIVING STREETS CANBERRA**

via email to [draft.amendment@nca.gov.au](mailto:draft.amendment@nca.gov.au)

**17 February 2026**

# Living Streets Canberra

Living Streets Canberra is a grassroots, SEE Change group that works for everyone to be able to enjoy public spaces and walk\* easily, safely, and conveniently. We work for everyone – whether young or old, fast or slow; walking, sitting, commuting, shopping, between appointments, or out on the streets for exercise, leisure or pleasure.

Our work includes advocating for:

- **all** environs where people may use active transport (that is, human-powered transport such as walking, rolling or riding) to **be – and feel – safe, accessible, comfortable, and convenient** – for **everyone** to use regardless of age, ability, gender, sexual orientation, race, culture, socioeconomic status or mode of transport. (The environs include the urban infrastructure, vehicles (particularly motor vehicles), and people's behaviour.)
- mobility options – including all streets, paths, crossings, and public transport stops – to comply with or exceed anti-discrimination legislation and accessibility standards.

We want to see:

1. walking as the natural choice for everyday local journeys
2. Australia as an inviting, safe, and comfortable place for people to be out and about, walking\* and being in public spaces full of walking\*-friendly communities
3. people being supported and encouraged to choose to walk\*, particularly for transport.

Living Streets Canberra works with various organisations and allies locally, nationally, and internationally. Locally, these include Advocacy for Inclusion, Council on the Ageing ACT, ACT Council of Social Service, Pedal Power, Public Transport Association of Canberra, SEE-Change and Conservation Council ACT Region. Nationally, these include Better Streets and Climate Action Network Australia. Internationally, these include the International Federation of Pedestrians.

- Walking is natural...so walking should be a natural right.
- Every journey involves some walking.\*
- Walking\* is a legitimate use of public space.
- Walking\* is an essential part of sustainable mobility.
- Walking\* improves the health and liveability of communities.

\* We focus on people who get about without a vehicle. When we use the term 'walking', we include any form of human-powered mobility that is not a bicycle: walking; using a wheelchair or other personal mobility device, including those with motors that can travel up to 10 km/h; pushing a pram; wheeling luggage; riding a scooter, skateboard, tricycle or rollerblades.

# 1. Introduction

Living Streets Canberra welcomes the opportunity to provide a response on the National Capital Plan Draft Amendment 102 – Hume Circle Precinct (the Precinct).

Our submission provides broad principles as well as some site-specific issues we believe should be considered in planning for this important inner-city redevelopment.

We support the Draft Amendment in-principle, subject to the inclusion of a statement acknowledging that pedestrians are at the apex of Canberra's accessibility hierarchy and ensure that the planning, design and development of the Precinct is consistent with this aim. This is especially important in the subject area because of Hume Circle's existing traffic conditions as one of Canberra's most dangerous intersections.<sup>1</sup> The proposed higher densities resulting from the Amendment demand that comprehensive traffic planning for the Hume Circle and surrounding road network must be carried out before development applications are assessed.

We would welcome the opportunity to discuss our submission further.

# 2. Context

The proposal must be considered in its context.

## Broad Context

Our views take account of, amongst other things, the broader context in which the Precinct will work. These include:

- International, business and Australian (Commonwealth, State, Territory), and Local Government commitments, policies and needs for:
  - reducing and stopping air and water pollution and damage to the climate
  - increasing road safety for all road users (particularly vulnerable road users), not just those in increasingly large vehicles
  - increasing health and wellbeing of people
  - increasing efficiency of land-use and resources

(all of which will require significant shifts from private car use to active and public transport) and adapting to the consequences of damage already done to our climate;

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<sup>1</sup> City Services, ACT Government, 'Intersection Rankings', <https://www.cityservices.act.gov.au/roads-and-paths/traffic/road-safety-improvement-program/rsip-search/intersection-rankings>, viewed 16 February 2026.

- all of the Commonwealth, State, Territory, national and international anti-discrimination legislation, standards and commitments - not just some for disability;
- International moves to safe, efficient and climate-neutral transport solutions;
- ACT Government commitments to active transport, noting that reducing greenhouse gas emissions from transport is a key component of achieving that, and its statement that want to be Australia's most walkable city;
- the [National Urban Policy](#) - noting that the re-development of the Hume Circle Precinct should at least be consistent with the National Urban Policy, particularly the vision (p 2) and pp 19, 30, 35;
- Australia's:
  - reputation and ambitions for being healthy, active and inclusive;
  - need for a world-class, integrated transport system where people can move between transport modes seamlessly and access transport easily, regardless of where they live or visit and their ability or background, and
  - a rapidly growing and ageing population; and
  - Commercial and environmental pressures for increased efficiency of land use.

## National Capital Plan Context

Our comments relate particularly to ensuring delivery of the following elements of the National Capital Plan (NCP):<sup>2</sup>

### Objectives

- 1. Recognise the pre-eminence of the role of Canberra and the Territory as Australia's National Capital.**
- 8. Support and promote environmentally responsible urban development practices.**

### Themes

- Productivity
- Sustainability
- Liveability, particularly the Principles:

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<sup>2</sup> <https://www.legislation.gov.au/F2007B00014/latest/text>, accessed 15 February 2026.

- i. Urban development will be planned in a manner which promotes community vitality and safety, applies the principles of crime prevention through environmental design and recognises the needs of people with disabilities.
- j. New development, including public spaces, should:
  - exemplify sustainability principles
  - demonstrate excellence in urban design, landscape and architecture
  - facilitate pedestrian connectivity and bicycle movements where appropriate
  - encourage energy efficient development and land use.
- Accessibility, with its Objective to ‘Support a connected and equitable multi-modal transport system’ and its Principles:
  - a. Accessible movement systems for a diversity of pedestrian, cycle, public transport and private transport modes will be provided, with good connections between different modes of transport.
  - b. An accessible movement system will be achieved by:
    - maintaining the national and arterial road systems
    - supporting efficient and sustainable pedestrian, bicycle and public transport systems that reduce car dependency
    - maintaining movement around the city for a diversity of pedestrian, cycle, public transport and private transport modes
    - providing streets that foster a connected and pedestrian-friendly environment
    - reducing the barriers created by major roads to make it easier for people to access the public spaces of the city, particularly in the Central National Area.

## **Policies for national and arterial roads**

- a. The National and Arterial Roads System will:
  - i. generally not provide frontage access to development, except where such access will meet appropriate design standards and road safety needs

## Commonwealth and ACT Context

Our comments also reflect:

- Commonwealth and ACT Government commitments for significant reductions in greenhouse gas emissions (which will require significant shifts from private car use to active and public transport).
- Commonwealth and ACT anti-discrimination legislation and commitments.

Key to most of these is best practice or excellence in design as well as compliance with anti-discrimination legislation, and these comments also reflect this.

## Fit for purpose

It is important that planning for higher densities is accompanied by complementary transport planning to ensure that those urban change areas are served with safe, reliable, accessible and convenient transport options for residents, workers and visitors.

Failure to do so risks perpetuating existing car dependency. Paired with greater density and reduced requirements for provision of car parking spaces, this will increase traffic congestion and illegal parking (often involving vehicles using green verges, bike lanes and public greenspaces, thereby compounding the harms).

For the Amendment to be fit for purpose and achieve the stated purposes for it, the final Amendment must include a statement acknowledging that pedestrians are at the apex of Canberra's accessibility hierarchy and ensure that the planning, design and development of the Precinct is consistent with this aim.

This is especially important in the subject area because of Hume Circle's existing traffic conditions as one of Canberra's most dangerous intersections.<sup>3</sup> The proposed higher densities resulting from the Amendment demand that comprehensive traffic planning for the Hume Circle and surrounding road network must be carried out before development applications are assessed.

Furthermore, key points for paths and roads in National Capital Designated Areas, including the Hume Circle Precinct, is that they must be - and feel - fit for purpose (i.e. anyone to use) are that:

1. All our active travel environs and public spaces (including paths and streets) must **be** and **feel safe** (not safer), **accessible, comfortable and convenient**

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<sup>3</sup> City Services, ACT Government, 'Intersection Rankings', <https://www.cityservices.act.gov.au/roads-and-paths/traffic/road-safety-improvement-program/rsip-search/intersection-rankings>, viewed 16 February 2026.

- for **everyone** to use regardless of age, ability, gender, sexual orientation, race, culture, socioeconomic status or mode of travel.
- 2. They must comply (or, preferably, exceed) requirements in anti-discrimination laws.
- 3. The more vulnerable the user, the more effort must be put into their safety.
- 4. Avoiding crashes is critical, yet humans are fallible, so measures are needed to prevent fright, injury or death in the case of conflict and crashes (because mistakes and failures are still likely to happen).
- 5. Safe speeds and infrastructure (vital for safe speeds and personal safety of active travel users) are key parts of the Safe System Approach to road safety.
- 6. The Safe System Approach is the basis for and at the heart of, Commonwealth, State and Territory governments' transport policy-making and efforts to improve road safety and achieve Vision Zero for deaths and serious injuries on our roads. It includes the 'Swiss cheese model' for reducing risks.
- 7. Lighting, even surfaces, and line of sight are vital for people to be and feel safe.

### 3. Principles

Living Streets Canberra recommends that the following principles must be applied to planning the Precinct in order to get more people to travel actively, more often. These principles will help to overcome barriers to creating a good active travel environment and address key issues in broader statutory, policy, and real-world contexts.

1. **Safety** – All of ACT's active travel environs should be safe – not safer – and feel safe for everyone to use active travel, regardless of age, ability, gender, culture, or mode of travel.
2. **Clear hierarchy of travel modes and users** – The application of a clear transport hierarchy is key to safe active travel and good practice for urban and transport planning. It is essential that the basic and most vulnerable mode of travel, walking, be the top priority in the planning and design of the area.
3. **Convenience, comfort, and physical attractiveness** – Transport routes, infrastructure and allocation and treatment of public spaces (particularly streets) affect the convenience, comfort and physical attractiveness of active travel and need to be considered early in the detailed planning stages of the Precinct. The NCA and ACT government should jointly prepare a Public Realm Improvement Plan for the precinct which informs the development assessment and approval conditions for all future development in the Precinct.

4. **Behaviour and attitudes** – In a car- and individual-oriented culture and environment, considerable a significant shift in planning practice is needed to change behaviour and attitudes to be focused on community and care for other road users (particularly the most vulnerable). Precinct planning must include actions to encourage these changes. To support the changes needed, implementation need not be limited to or controlled by government; in fact, community-initiated and -owned changes can be just as successful, as well as cheaper and quicker in their implementation.

## 4. Site-specific issues

The success of increased urban density relies on residents and workers being able to access local services and public transport without relying solely on private vehicles. Density needs to be accompanied by improved provision and maintenance in active travel facilities (lighting, footpaths and accessible bus stops) to ensure these new homes and workplaces are well connected with high-quality local urban infrastructure from day one.

### Current situation

The existing physical condition and vehicle dominant character of the area surrounding the Hume Circle does not currently support safe, convenient and comfortable walking and cycling. Specific issues include:

- cracked and broken paths
- discontinuous paths that finish abruptly where walkers are forced onto roads and uneven verges with trip hazards
- paths that are too narrow
- a lack of cycle paths
- lack of a coherent, high amenity landscape structure for the Circle.

The prioritisation of vehicle movements, both in terms of speed and volume, currently poses significant hazards for pedestrians and cyclists. The subject area will require significant and integrated traffic management improvements to become a safe and attractive pedestrian and cycle-friendly precinct. This issue and how it will be implemented are not adequately addressed in the Background Paper at 4.2 or in the proposed Amendment's planning controls and need to be included.

## **Access to high-frequency inter-district public transport**

It is important to consider, early in the Precinct's development planning stages, the future public transport needs of the Precinct in serving an increased level of patronage.

This planning should seek to improve travel connections between Hume Circle, Eastlake and the planned Dairy Road development. These proposed higher density developments will result in a greater volume of pedestrian movements and demand for public transport as an adjunct to active transport. The resulting increased population density will require re-thinking the current and future public transport needs of the area. The current Rapid 2 route, while a popular and well-used service, may not have the capacity to service the increased residential and commercial areas in these developments.

Consideration also needs to be given to improving the connections between transport hubs (the Railway station and airport), Woden, Civic, Manuka, Symonston, and Fyshwick. Future bus services will require a mix of local area services and Rapids. This needs to be acknowledged in the precinct planning and addressed by Transport Canberra in their service planning.

## **Active travel connections**

High quality active travel connections to and within the Precinct are crucial. Active travel paths should be wide enough to safely support a range of travel modes. This can be achieved either with paths of 4.5 metre width or with clearly designated separate cycling and walking paths.

## **Mixed-use and walkable neighbourhood**

An attractive, safe, and easily walkable neighbourhood requires a complementary mix of uses and activities incorporating small-scale retail, cafes, and restaurants, as well as services such as childcare, primary healthcare and community facilities. It should be noted that some of these services already exist along Wentworth Ave close to, and within, the Kingston Foreshore but should be extended and included in the development and land use mix of the Precinct.

If residents are unable to meet their basic daily needs within easy walking distance, this will lead to increased car usage and consequent congestion, particularly along Canberra Avenue and adjacent road network which already has congestion issues in peak periods.

## Street design and lighting

Street design should prioritise safety and convenience of active travel in the Precinct and in connections to surrounding areas. Access to direct and safe walking routes (particularly around Hume Circle and adjacent road intersections) must be available for people of all abilities and ages, especially children, people with disabilities, and older people. This is particularly important for retirees and with consideration of a changing climate with increasingly variable and extreme weather.

Lighting for all paths and crossings should meet best international practice. Suitable guidance is available (including Part 3.1 of AS/NZS 1158.3.1:2020) and includes site-specific considerations. Public lighting need not be restricted to overhead illumination. Consideration should also be given to providing lighting at or near ground level integrated with new street planning as part of a comprehensive public realm plan for the Precinct. The funding and shared implementation of this plan should be addressed in the planning controls for the precinct. A development contribution scheme (administered by the ACT government) requiring developers to fund and conduct public realm improvements in the verges adjacent to their projects should be applied. This would be informed by a detailed Public Realm Plan for the Precinct.

## Access to vehicle share services

Access to shared vehicles is important for supporting car-free-living transport choices for those occasions when a vehicle may be required for a specific purpose. Reserved parking for vehicle share services should be provided centrally within the Precinct.

## 5. Conclusion

The proposed redevelopment of the Hume Circle Precinct provides an opportunity to plan and create an exemplar for the creation of an attractive and diverse medium to high density sustainable community. Achieving this outcome will require a commitment from both the NCA and ACT Government to ensure the primacy of active and public transport modes to provide a safe, direct and comfortably walkable public environment that ensures future residents and workers can fully meet their basic daily needs within the Precinct.