

From: [REDACTED]
To: [Terrplan](#)
Subject: Fwd: Territory Plan Change: DPA-06
Date: Monday, 13 October 2025 1:33:46 PM

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POSTSCRIPT

[REDACTED], NARRABUNDAH
46 year resident

Would you kindly attach this Postscript to my original objection posted on 10 October 2025 please?

On Sunday morning 12 October 2025, the GNCA set up a stall outside Shoprite at the front of the Griffith Shops. As I have been attempting to contact this group for some time without success, I approached one of the people on the stall who kindly agreed to walk through the precinct with me and discuss the proposed site plans. I wanted to point the waste disposal laneway concerns which I am aware those who do not live close to the site would be unaware of. While discussing the planned site, I noticed the commercial bins at the back of the shops have recently been replaced with lighter, smaller and cleaner looking plastic bins which is an improvement but this cannot solve the massive commercial food waste disposal issues generated at ground level at the front of the shops. This person was unaware of the rat problem which is normal because those who do not live close to the site are not affected however, like me she knew the history of our previous battles to save our park, she knew about the natural spring over there and the electricity infrastructure network under the carport which was heartening and she remembered the tennis court, as I do.

It is relevant to mention there has been no similar walk through conducted by senior bureaucrats and/or politicians for this particular health site development proposal and there have been no letterbox announcements either. Some time ago however, the proposed *stormwater* improvements group placed a pamphlet in local letterboxes and set up a stall on green space behind the shops one Saturday morning to inform locals about that proposed storm water plan. This was before the walk in health centre had been publicly announced.

There are more relevant concerns I request to be added to the other concerns I have raised:

1. **Asbestos removal guarantee.** The proposed site used to be a government-run nursery which has been leased post its closure many years ago. The most recent tenant was an asbestos removal company which deserted the site leaving behind a considerable amount of junk and mess, including trucks and trash. A sign warning locals about asbestos was eventually erected. **CONCERN:** has this site been cleared of all traces of asbestos? If so, when did it happen and how much asbestos was detected at the site?

2. **Recently installed new commercial green bins behind the Griffith Shops.** I was happy to observe the new recently installed commercial bins stored at the back of the shops have replaced the old, clunky, noisy, large metal bins. The new bins look cleaner

and smaller however, it will be only a matter of time before clean bins change. We walked passed one bin which was bulging with others next to it on the verge of bulging which is normal.

3. Inevitable traffic overflow into Hacking Crescent. If this *mad (my view)* proposal goes ahead which I expect it will, may I suggest Hacking Crescent be closed off at No 2 and No 1 (both social housing properties) and greenery be planted to prevent cars entering our street from this end. This is possible because Throsby Court residents have garages located and access from the rear laneway behind their homes. It is rare for us to need to park out the front. It would be sensible to declare our crescent, *residents only* as happens in metropolitan areas. This protection could be managed by issuing cards to local residents to cover visitors and personal needs. The mainly private owners on the other side of Hacking Crescent need to be able to navigate their individual driveways should our street be closed off at one end and that should not pose a problem. It is a slight inconvenience of the six Thereby Court residents living in units facing Hacking Crescent and other residents on our street but it is better than not being able to navigate our street safely, as we can now. We will be able to issue visitors with an exemption card and all of us will need to drive to Stuart Street to re-enter our garages located on the back lane and owners from their driveways. For Throsby Court residents this will not affect leaving our homes. I have given this possibility considerable thought. The amount of increased traffic on our narrow street is particularly disturbing for our long term elderly residents facing Hacking Crescent and all of us are growing older.

The other concerns I have raised in my previous submission remain problematic. Even if this development does not reclaim the car park or cause the carpark to spill onto park land where the heritage playground is now located which I was worried about, enough parking spaces remains risky. This development nonetheless will reclaim some carapaces and hopefully it will not spill over onto the green spaces my home overlooks causing light and noise pollution which I already battling with.

Apparently the swings will be moved to make way for the proposed storm water infrastructure. I am not aware of how this storm water catchment will look because at the community engagement I attended some time ago, there were only rough artist impressions and when I asked questions, they were not answered. I recall asking whether the storm water innovation was being built because there were plans for another land grab in our precinct. I apologised for appearing cynical but experience had taught me there are usually hidden agendas. I also recall the look on the mans face. I was right which would not be difficult, given the context of the amount of green space we, who live in this particular Griffith/Narrabundah corridor, have been forced to surrender over the years not to mention our local library.

The construction phase remains problematic for the significant amount of elders who are home during the day and who live at Bishopsborne Court, Throsby Court and to a lesser extent, Baptist Care because it is located a little further away. However the noise, dust and chemical pollution will have an impact on all residents and elders are particularly at risk because we are home all day and our bodies are not as resilient as when we were younger. As established, I am not confident my medical disability MCS (multiple chemical sensitivities) will make it possible to live in my home during construction.

Postscript

13 October 2025

[REDACTED], NARRABUNDAH resident since 1979

Begin forwarded message:

From: [REDACTED]
Subject: Territory Plan Change: DPA-06
Date: 10 October 2025 at 4:02:07 pm AEDT
To: terrplan@act.gov.au

Re: My objection to the Proposed alteration to the Territory Plan required to build a walk in Health facility behind the Griffith Shops

[REDACTED], NARRABUNDAH ACT 2604 (this address is deceptive because [REDACTED])

[REDACTED] Throsby Crescent is the dividing street between Griffith and Narrabundah. I have lived in my home for 46 years.

I am an advocate for elders generally and over 65 living with disabilities, particularly hidden disabilities. I have been diagnosed with two incurable and hidden disabilities which were triggered before I was born and diagnosed after I turned 65. There is no funding from the Commonwealth government for elders living with disabilities and the Aged Care sector which was mandated to care for elders living with disabilities after it was decided to exclude us when the NDIS legislation was enacted, has not happened. Those over 65 cannot access NDIS or other disability funding and services because of the year we were born.

I am an advocate for historical child victims of domestic violence. Unfortunately the Commonwealth and NSW governments provide no funding to support historical DV victim survivors. The NSW government (I was born in Sydney in 1951) provides counselling which is insulting if the counsellor is not qualified to diagnose. Obviously children who experience early family separation alongside witnessing domestic violence must carry lifelong wounds. I have been informed I am a rare survivor.

1. BACKGROUND INFORMATION

1.1 Personal Information. I am 74 and have lived in my social housing home which faces Hacking Crescent and [REDACTED] to the proposed new Griffith Shops health facility site for 46 years. In fact, the laneway behind my home continues behind the Griffith Shops, Throsby Lane. During my long tenure there have been numerous applications to redevelop this proposed Health facility site which has forced concerned locals to fight to save our precious heritage playground and open space park. The most recent application was the French Australian 24/7 childcare centre which happened when Senator Humphries represented Canberra in the Federal Senate and won helped us prevent.

1.2 Loss of Vital Green Space. It is relevant to point out we Narrabundah/Griffith residents (Throsby Crescent marks the border between the two suburbs) have lost a considerable amount of our open green spaces over the years, despite being promised each time, it would be the last. First, Bishopsbourne Court (an age care public housing complex); next Baptist Care aged care centre which swallowed a large amount of the oval open space. It used to be part of the Griffith Primary School and a vibrant community hub and its replacement has not replaced that loss, then the Community Centre. Of course, those of us who fought to save our local library will never forget that loss although that was not a green space loss but a vital community hub loss.

1.3 This is not the first time this proposed site has been claimed. The reason I am disputing the proposed corner block is an effort to preserve our community health which is especially relevant to the many elders who live in this precinct. Unfortunately, this space has continually been under threat for decades and many who have fought for it in the past, are no longer with us. I know local history better than the younger senior bureaucrats and politicians who visit this site from other parts of Canberra. It occurs to me they visit with the decision already made and they never request to speak to elder advocates, like myself or long term resident advocates who are likely to be most impacted. In my opinion, absurd decisions are often made which are bound to affect the quality of life of those who live close to a site or facility. In this instance, this decision will especially affect the social housing residents no cares about and other elder complexes which surround the proposed site. Many of us at this end of Throsby Court have lived here for decades. We have successfully raised our families here and are now grandmothers (one needed to be a single mother to gain access to Throsby Court until relatively recently).

1.4 Person Health Concerns. During the construction of the proposed facility my health will be under severe stress because I have been diagnosed with multiple chemical sensitivities (MCS), a disability lodged in the Federal and State government Disability Acts. I will not be the only long term local resident affected because this is an enormous development proposal, involving a huge amount of infrastructure relocation and change. The elder residents at Bishopsbourne Court and Throsby Court will be affected by intense noise, dust and chemical residues during the construction phase which might take more than a year to complete (we have not been informed). I probably will not be able to safely live in my home and finding a solution will not be easy because of specific MCS requirements I require to live safely.

1.5 There is a history of some related noise and light pollution in this Precinct. I have needed to complain about the noise generated by commercial trucks which use Throsby Lane to the EPA for decades (evidence). Throsby Lane was originally designed to be a **waste disposal laneway and these days it is also a delivery laneway.** When I arrived here in April 1979 there were few food outlets located at the shops. This has changed rapidly over the years to the point the only two shops on ground level which are not food outlets are the Newsagent and Chemist. There are approximately 11 or more food outlets now, and the health food shop is about to become a bakery/cafe after its sale. The amount of food waste disposal generated by these food outlets is enormous and food waste is disposed of on Throsby Lane in special large green commercial bins. Of course, there are significant deliveries required to service the shops and some of those truck noises are deafening and can be heard throughout my home and the neighbourhood.

1.6 Throsby Lane is a waste disposal laneway. The laneway which runs behind my home facing Hacking Crecent and continues behind the Griffith Shops, is called Throsby Lane. I have been continually complaining about the commercial truck noises breaking curfew for decades (EPA evidence). The laneway upon which this proposed health centre is to be built is a busy food waste disposal hub and the waste disposal infrastructure cannot be easily moved or modified. Nor can the large green waste bins each business uses be wheeled easily.

1.7 Lack of public transport must cause other local resident challenges. Should an Inner South resident be able to access this proposed \$22 million health facility using public transport which is currently impossible which I cannot see it being easily fixed, that person will be forced to walk passed those large green bins to access the proposed health facility because the bus stop is located at the front of the Griffith Shops on Stuart Street. When the wind is not blowing, those bins often stink, they are usually overflowing and there is a far graver health concern risk which we social housing residents who live adjacent to the

shops and laneway have learned to live with and manage. Rats.

2) Proposing to place a health facility alongside a dedicated waste disposal and delivery laneway hub in my informed local view is not pragmatic and worse, it is not healthy. The following are my old lady, long term local resident concerns and observations:

2.1 Throsby Lane is a waste disposal and food delivery laneway hub built specifically for these purposes. Throsby Court social housing complex is located adjacent to this proposed site and it was built around 1949-1951. My home was first tenanted in 1951, the year of my birth and I have held my 99 year lease which the ACT government has cancelled, since 19 April 1979 or for 46 years and counting. Obviously, when I first moved here with my four month old baby, there were few food outlets at the shops. However, as that reality has changed, so too has the commercial truck noises which continually generate neighbour disturbances when the drivers break the curfew between 11PM and 7AM (EPA evidence). These days the shops on ground level are predominantly food outlets, apart from the Newsagent and Chemist. The health food store has been recently sold and will soon become a bakery/cafe. The Griffith Shops are known to be a vibrant restaurant, cafe and quality organic food hub across Canberra and the shops have been thriving from the day I moved here in April 1979.

2.2 Changing the function of the laneway would be difficult and that cannot solve the associated problem. It would be impossible for those large commercial green bins which manage a huge amount of food waste to be moved to the front of the shops or elsewhere at the back. Rolling the bins to a common site or expecting business owners to carry their waste for pick up from a large, locked facility would be challenging and cannot solve the vermin problem. I am trying to imagine how all the businesses at the shops would be able to carry their food and other waste to a locked space under one roof, as that building would need to be large to hold the required amount of commercial bins each business would need and it would be not healthy engaging with it. It would be something like 11 food outlets plus the upstairs business I cannot count but it would be significant, perhaps another 11, 22 is my rough estimate. Even if a covered and secure bin disposal building could be built, it would have to be large and locked and it would not stop rats and possums from gaining entry. Imagine attempting to navigate such a facility each time a business needed to dump rubbish. The commercial green bins are large, they often stink, they are never cleaned and often bulge. If it could be manageable, why has it not changed over the years? There are many delivery trucks which must use the laneway and the noise of some of those trucks is often deafening inside my home.

2.3 Food waste attracts rats. There is a massive rat problem in our neighbourhood which is generated from the amount of food waste. Our wonderful bird population helps control many of the dead rats however, I often find dead rats in the laneway and sometimes in my garden. It is normal for me to watch a trail of rats scurry through my garden, especially after I have been away for an extended time. I had to change the way I composted decades ago but rats and possums come into my garden to eat the food I grow. Years ago there was a rat infestation in my kitchen at the back of my fridge which took me a long time to discover and I am not the only Throsby Court resident to have experienced that. If one walks through the complex, one will observe little black boxes mounted strategically. They were installed to help manage the rat problem. Now I know I must make certain rats cannot get inside my home and of course, fridge technology has changed but it remains warm behind a fridge which is where rats like to mate.

2.4 Traffic Chaos on our local narrow streets will be a fundamental infringement of renter rights. The streets in this precinct are narrow and were not designed to cope with

the excessive increase in traffic this facility has been designed to attract. It will be particularly challenging for the many elderly residents living at Throsby Court and Bishposbourne Court and in the wider community. Many of us have lived here for decades. Hacking Crescent and Strezlecki Crescent will be particularly impacted by the full new carpark overflow because after we will lose our beloved playground and park to make way for the new parking lot, when it is full, our streets are the closest. Of course, many will want to park along Throsby Crescent. The added traffic increase is obviously going to be influenced by the fact providing public transport to the Griffith Shops from all the Inner South suburbs this health facility is designed to serve will be challenging, if not impossible. The amount of traffic a facility like this which the ACT government predicts will attract, must change the way our neighbourhood operates and with that, there will be the accompanying noise disturbances caused from cars starting, car doors slamming, talking and the like. We who live on Hacking Crescent are familiar with these sounds because during the Christmas and other seasons our streets are usually packed. To young people, these concerns may not occur as menacing but to elders, they are very real, not to mention the increased risk of vehicle accidents. The High Court of Australia ruled on neighbour disturbances on 1 November 2023, *Young v CEO NT Housing*. It ruled such disturbances are illegal and it has endowed renters the right to claim compensation whenever their right to feel *distress free and safe in their home is* violated. In the ACT that right is enshrined in the RTA 1997 as *quiet enjoyment* and each State and Territory uses different words in their individual RTAs. How could the amount of traffic predicted to visit our neighbourhood not impact that right? This is not to mention light and other noise disturbances such as facility will likely generate?

2.5 Lack of public transport to service all the Inner South suburbs this health facility has been designed to service. I am at a loss to understand exactly what demographic this facility has been designed to serve. For instance, Griffith and Narrabundah (aside from Throsby Court social housing complex) has a higher than average amount of high income earners who can afford private health insurance. Elders like myself, must have access to a GP because my hidden disabilities are complex and cannot be managed by a nurse and the same is true of many elders who already have bulk billing and use teleconferencing. We elders know oral health has been outsourced in the ACT and there are ample pathology services located in Manuka and Kingston. Therefore the fact it will be challenging to provide adequate, affordable and easy access to the Griffith Shops from all the Inner South suburbs in my view will be impossible, without disturbing the easy access of the current No 5 bus route provides to Woden and Civic. Since Narrabundah and Kingston residents were given an alternative bus service, the No 5 bus route is way more efficient. If a bus route could be designed to cover all the Inner South suburbs to deliver patients to the Griffith Shops, I cannot see how it could ever be pragmatic or affordable. The Griffith/Narrabundah walk-to client demographic will be low. So why choose this kind of remote and hard to get here by public transport to build a health facility?

2.6 What is the purpose of this health facility? Lack of public transport to service all Inner South suburbs begs many questions: What is the purpose of this health facility? Why choose a local shop site requiring \$22 million to modify existing infrastructures to be able to build a new building able to fit the purpose? This in turn must generate neighbour disturbances and challenges for local residents, especially the elderly and particularly social housing residents like me who live close to the site. Moving the carpark to our local park must generate noise and light intrusions, as my bedroom overlooks the playground and park. How can that level of light pollution not disturb my sleep? Light and noise pollution are already problematic in this precinct which the EPA can confirm and these issues are not easy to amend or fix in my experience and involve long waiting times. I have to fight for my rights over and over. Many of the concerns I reported years ago remain outstanding. I also wonder about the health safety of placing a facility like this so close to

residents, as this facility must generate specialised medical waste. What if a rat or possum gets into a medical waste bin and/or an accident happens which has the potential to release harmful viruses and the like? I am not an expert but I would imagine it would be safer for community health to locate a facility like this in an inner south business hub like Kingston, Manuka or the Foreshore but not opposite residents.

2.7 What happens to the many elders who will be adversely affected by excessive construction noise, dust and chemical residues, a development of this scale must generate during construction? My MCS disability will likely not be able to live in my home during construction because I will likely be continually sick and such exposures can be life threatening for MCS (evidence). The elders living at Baptist Care, Bishopsbourne Court and Throsby Court will all be impacted by excessive noise pollution during construction and this is a relevant concern for the panel to consider. As it is, I find myself continually advocating for the rights of elders, particularly on long train journeys. This precinct has a higher than average elder population because of the facilities already located here. The amount of infrastructure construction required to make the proposed site viable ie) \$22 million which might escalate, does not appear like money well spent to me, especially given the challenges, stresses and impact upon our local way life, which this development must demand. For instance, the precinct underground electricity infrastructure is located behind the shops and I am already experiencing issues which EvoEnergy which is denying responsibility for. Noise associated with a recent infrastructure modification at Throsby Court. Since a massive all electric upgrade here, there have been hard for me to locate/sourc noises and loud bangs which are continuing. These noisesl increase exponentially during the colder months because of increased electricity demand. Imagine the prospect of attempting to gain help with hard to source noises coming from this new development. It is impossible to get EvoEnergy to even investigate the source of the loud noises which disturb my sleep, let alone fix it! There is a natural spring in the green space over there which I think the so called *storm water* infrastructure proposed at the other end of the park, is designed to manage. Of course, old ladies do not have access to these finer details.

2.8 Light and Noise pollution will be generated from the facility itself and its carpark extension. I have already been continually complaining to the EPA (evidence) about the excessive amount light pollution generated in the park at the front of the Griffith Shops and along the side of Shoprite. I have had to wait years for this to be addressed and I am not confident it has been completely solved. The noise from the Shoprite a/c has been another battle I have fought for decades and I do not feel confident this new facility will not generate noise disturbances from its a/c. After the carpark is relocated and we lose our precious, vital green space which is relevant for medium density social housing residents (tiny yards) and apartment dwellers, the lights in the car park will be visible from my bedroom window and this will generate more light disturbances which I will be forced to fight to have fixed and wait long periods of time for it to be fixed. Despite the fact, this would be a violation of my High Court of Australia validated legal right and ACAT has ruled light pollution is a neighbour disturbance (Gabrielle v the Commissioner for Social Housing, 28 April 2023), nonetheless, not much has changed on the ground post the HCA ruling for obvious reasons. Public buildings are usually lit all night and this building will generate more light pollution which will be difficult to resolve. These concerns coupled with the fact we locals lose more of our precious green open space does not appear to concern the ACT government which to me, appears determined to go ahead with this expensive development and change to the Territory Plan whether this proposed facility works for all involved or not, especially theelderly, long term residents. I have been advocating the Minister for Health since July last year. I have written to the relevant government Ministers, pleading with those involved to consider the situation from the perspective of those most affected and at least take the time to visit the precinct and talk to

me as we walk through the challenges I have raise. Of course there has been no response.

3) IN CONCLUSION

3.1 Final sentiments. It is unwise to build a new Health facility without adequate public transport access to all those it has been designed to service living in the Inner South. It is not wise to even consider building such a facility alongside a busy waste disposal laneway and delivery hub. It is *rat heaven* in this precinct and has been so for decades. The noise and light disturbances an infrastructure change of the scale required to make the lot behind the Griffith Shops a viable proposition must place the elderly communities which surround this development site under extreme pressure, both during and after construction. As to local long term residents, like myself who live adjacent to the proposed site, our health and elder wellbeing will be gravely impacted for a service I certainly will never use, as my disability medical requirements require my GP and Clinical Psychologist to manage.

3.2 Stuck here no matter the result of this assessment. Social Housing tenants cannot sell and move away. We are stuck. In fact, it is known there are many elders living in Canberra who no longer have family living in the ACT. I do not. We also have little power to influence our landlord which is managed by the ACT government about our specific requirements and specialised needs. Those on the panel who might be thinking, I am able to request a transfer I advise, need to think again as for MCS that will not be easy. I will not be the only elder adversely impacted by this proposed development. My immediate soon to be 87 year old neighbour is worried about the increased traffic and risk of vehicle accidents. I understand her concerns because everything changes as we age.

3.3 My specialised medical requirements. MCS has specialised home medical modification requirements which are not easy to find or source. I cannot live safely in an apartment because of risk of chemical exposures and gardening is a vital part of my daily routine. There was a major issue with a recent tenant here who has since moved who used excessive amounts of chemicals which filled my home and caused my MCS and elder health grave harm (GP documented). It was devastating and my suffering has been immense. I believe the affects have been long-lasting and I may never be able to recover from it.

3.4 The importance of connection as we age. This has been my home for 46 years and I have sunk a considerable amount of money, time and energy into my home over the years which I will never be able to recoup. There are no interstate social housing transfer options, so I cannot consider moving closer to my family who live in Melbourne and Newcastle, my hometown. If I could consider that option, I would but I have accepted it is not possible. I have accepted I am destined to live a long distance from my loved ones for my remaining years and if it means coping with continual light and noise disturbances, there is nothing much I can do, apart from refer it to ACAT which I have done and continue to do. I raised the lack of interstate transfer issue during the recent Disability Royal Commission and continually do what I can to alert decision makers about the need to support elders and those living with disabilities who live in isolation a long way from their loved ones.

10 October 2025

[REDACTED], NARRABUNDAH ACT 2604 (located adjacent to the proposed site)

Representation for EIS or Territory Plan Variation Notification_1 - Submission confirmation

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Date and time

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Reference code

2PT9794V

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Canberra City, ACT 2601

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Type of representation

About this form

Use this form to lodge a representation for a current amendment to the Territory Plan or a current Environment Impact Statement during the notification period.

Application type

Please select the application type:*

Territory Plan Amendment Notification

Representer details

Title

Given name*

Family name*

Organisation name

Resident

Enter at least one phone number: *

Home phone

Work phone

Mobile

Email address*

Application details

Amendment number*

Provide the details of your representation*

I have concerns about safety of bicycle and pedestrian access from Kingston crossing the major thoroughfare of Canberra Avenue near McMillan circuit to access the minor cycle route to the Griffith shops. This crossing requires an overpass to safely provide for the already high and expected higher demand for pedestrian and bicycle access across Canberra Avenue at this point to get to the health centre.

You may upload any additional supporting documentation or photos.

- Maximum file size is 10Mb.
- A maximum of 5 files can be uploaded.

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Copies of written comments will be made available on the authority website unless the submission is withdrawn. Copies of written comments will also be given to the proponent of the development proposal.

If you would not like your comments or a part of your comments to be made available on the website or to the applicant, a request must be made under Sections 502 or 503 of the *Planning Act 2023* (or Sections 411 or 412 of the *Planning and Development Act 2007*). A request for exclusion under these sections must be in writing, clearly identifying what parts of your submission you are seeking to exclude and how the request satisfies the exclusion criteria.

Printed copies of the draft amendment (this document) and background documents are available for inspection and purchase at the EPSDD Customer Service Centre, 8 Darling Street, Mitchell, Monday to Friday (except public holidays) between 8:30am and 4:30pm. Please call [\(02\) 6207 1923](tel:0262071923) to arrange a copy for purchase.

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Date and time

22 Oct 2025 12:00:37 PM

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X8RKF2FV

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Enter at least one phone number: *

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Amendment number*

Provide the details of your representation*

As a local to the Griffith shops and community here, it is apparent that there has been ZERO consideration to the last round of consultation where our community explicitly outlines that we cannot afford to lose the parking behind the Griffith shops with this new Health Centre. There is so much land surrounding the proposed building, why does the ACT Govt find it necessary to take away our parking? The light rail will never come to this area. People need their cars, you cannot rely on the bus network alone. The proposed plan is a farce and needs to be redesigned to keep the existing car park and add additional spaces for the medical centre. You will kill the Griffith shops if you get rid of this car park, and all of Canberra will know it.

You may upload any additional supporting documentation or photos.

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27 Oct 2025 8:48:59 AM

Reference code

8GPB5V7S

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Enter at least one phone number: *

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Application details

Amendment number*

Provide the details of your representation*

As a local resident for many years, we feel very fortunate to have the Griffith shops close by. We have a young family of two and we make frequent trips to Throsby Park and usually jaunt over to the shops afterwards. We appreciate the benefits the Inner South Health Centre (and stormwater improvements) should bring to the community, but we will miss having the local playground right next to the shops. DPA-06 mentions that the playground will be relocated and subject to a separate application. We understand that a playground may be relocated to a spot in Blaxland Park. We hope the new playground will be a welcoming and tranquil space for families and visitors that complements the natural environment.

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[Click here for more information on applying for exemption from the public register.](#)

Comment on Draft Major Plan Amendment 06 – Inner South Health Centre

Dear Sir / Madam

Thank you for the opportunity to comment on the proposed Inner South Health Centre.

I am pleased the Territory Government is planning for the health needs of Territorians, including through expanded services in the Inner South.

I do not, however, support the use of existing green space.

There is already land available in the Inner South that requires re-purposing or can accommodate higher density that could be used to accommodate such a centre. I recognise that this is more time consuming and legally challenging than occupying existing green space, however, green space is a particular amenity that makes Canberra so unique and plays a large role in why it is such a liveable city. It is the “bush capital” after all. The conversion of green space is basically an irreversible decision.

Land in the Inner South that currently appears under-utilised includes:

- The Art Space and associated car park (former Griffith library building) on Blaxland Crescent could be re-designed into the health centre and also accommodate some of the existing tenants. This has the added benefit of being easier to access than the proposed site.
- The derelict Telstra building on Stuart Street – with redevelopment this site could allow for a multistorey health centre with major arterial access.
- Expanding the existing Narrabundah health centre.
- Land near the Kingston train station that could be converted into a multistorey health centre with train parking.
- The unused block of land on Jerrabomberra Avenue between the Crestwood apartments and the Inner South Veterinary Centre is a blank canvas that could easily accommodate a new health centre.
- Similarly, the land on the corner of Canberra Avenue and Newcastle Street, opposite the DFO, is unused and appears to be an ideal site on a major arterial with easy access.
- The outdoor carpark behind the Bus Depot markets could be converted into a health centre with parking for both the markets and health centre patrons.

I am sure there are many more, including the existing building in the Throsby Crescent park that, again, is a poor use of space.

I am not a town planner and I have not considered all the existing Territory plans but this proposal appears to have been put forward because it is the easy option. It demonstrates a lack of innovation and respect for the liveability of our city. Many of the areas mentioned above are more appropriate locations for a health centre, as they are

near other existing facilities in less densely populated residential areas and with better access. The proposed site is also currently used by many local residents and families, and children are often seen enjoying the playground at this location.

Building a health centre in the proposed location also risks turning surrounding suburban streets that are currently very quiet into thoroughfares. In particular, the part of Strzelecki Crescent between Stuart Street and Throsby Crescent often has young children playing close to the road and riding their bikes. The section of this road between Stuart Street and Captain Cook Crescent is already used as a thoroughfare by people driving to the Griffith shops. A health care centre on the proposed site is likely to turn the other half of Strzelecki Crescent into a similar thoroughfare, which poses a risk to families and their children living there. At an absolute minimum, if the proposal were to go ahead, signage should be erected at either end of the 'quiet' half of Strzelecki Crescent indicating that it is for local traffic only.

However, with the range of suitable and more appropriate alternative options described above available to you, I would strongly urge you to please reconsider this proposal.

Yours sincerely

[Redacted signature]

From: [REDACTED]
To: [Terrplan](#)
Subject: Disappointing
Date: Saturday, 15 November 2025 4:25:52 PM

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19 November DPA-06

I am not in favour of this proposal. It will not add to the existing amenities of the area. In fact the demand for additional parking will impact negatively on the local residential streets which are narrow. They scarcely deal with overflow from the Griffith shops.

It is not a walk in centre as originally discussed. Is there a demonstrated need for the Health Centre as proposed?

I look forward to hearing from you.

Concerned resident of Hacking Crescent.

[REDACTED]

From: [REDACTED]
To: [Terrplan](#)
Subject: Rezoning for Health Hub at Griffith Shops
Date: Saturday, 15 November 2025 4:42:22 PM

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Dear ACT Government,

I am very concerned about the proposed zoning and other plans for the Griffith shops and plans to build a Chronic Health Care Hub.

I am **NOT SUPPORTIVE** of the current plans and believe that this needs to be ceased immediately with significant thought to some proper planning. This plan is ill thought out and will cause a lot more issues to the local community. The centre itself would be better placed in an existing medical area such as Deakin or Civic as it will be near existing services, medical practitioners and public transport.

There are too many questions that haven't been scoped or answered by the ACT Government. These include:

1. How will over the 50 staff and I can only image 100-200+ patients a day access this centre without dedicated public transport?
2. How will the local Griffith/Narrabundah infrastructure cope with significant daily specialist medical services centre including medical level waste services and additional demands on water/sewerage?
3. How will the aging electricity and internet infrastructure be expanded and improved to cope with this significant new level of demand?
4. What will be the impact on Griffith/Narrabundah residents with the significant number of patients and staff coming into the heart of a residential suburb to access daily chronic health care?
5. What plans are in place to expand the Griffith Shops to cope with this influx of staff and patients?
6. How will the Health Hub construction site be managed for the significant time period of the development particularly as this will have a significant impact on local traffic?
7. What happens to the shops with removed parking and lack of access to trucks providing deliveries and waste removal to existing commercial shops (including supermarket) in an already congested area?
8. What about the loss of local residents' access to green space and parks?

I really think the Health Centre is a good idea but not at Griffith shops. Why not look for a smaller walk-in centre? Why not repurpose the existing building that was previously Griffith Primary (just another 200m away) as this would have minimal impact on the shops, community and be a better use of spaces? This would also better align to future community needs.

thanks

██████████ (local resident that will be significantly impacted from this rezoning and development)

██████████

Narrabundah ACT 2604

11 November 2025

ATTENTION:

Territory Plan and Coordination Section, CED
Access Canberra Building Services Shopfront

Dear Sir/Madam,

RE: Formal Objection to Draft Plan Amendment 06 (DPA-06): Inner South Health Centre – Griffith

I am writing to formally object to the proposed plan amendment, DPA-06, regarding the establishment of the Inner South Health Centre (**ISHC**) at the Griffith Shops site.

While I fully support the ACT Government's commitment to developing an Inner South Health Centre, the proposed site selection at Griffith is fundamentally inappropriate to service the broader Inner South and fails to align with the facility's strategic objectives.

My submission details specific objections across four distinct categories: Inappropriate Location, Parking and Transport Deficiencies; Green Space and Character Protection; Alternative Sites; and Procedural Failure and Lack of Transparency.

As such, I do not support the proposed plan amendment (DPA-06) or the associated development for the reasons outlined below.

Inappropriate Location, parking and architectural character objections:

The proposed ISHC location is opposed due to **severe parking and transport deficiencies** and its fundamental incompatibility with the neighbourhood architectural character.

The decision to site a health centre, where the intention is to serve inner south of Canberra in the middle of a suburban community is contrary to established Urban Design Guidelines and the ISHC intention. Such major facilities, designed to serve the broader Inner South community, should be located on **major arterial roads** to ensure accessible healthcare without relying on quiet residential streets for commuter traffic.

- The plan proposes only **2.23 parking spaces per 28 practitioners¹**, a critical deviation from the Community Facility Zone (CFZ) recommendation of 4 spaces per practitioner. It is inappropriate to benchmark other community health facilities to justify the parking ratio deviation if they are located on major arterial roads and with adequate public transport that reflects the catchment area for users, neither of which this facility has. The Traffic Impact Assessment fails to provide any justification or evidence for this departure from CFZ planning guidelines. Based on the CFZ standard, the project should provide 112² new spaces. It must also compensate for the 56 existing overflow spaces being removed, which currently serve the Griffith Shops. This brings the total required parking provision to a minimum of 168 spaces.

¹ Traffic Impact Assessment Report, Appendix E: Proposed Development Plans

² 28 practitioners x 4 spaces/practitioner = 112 new spaces

The issue of sufficient, standards-compliant parking and the fundamental unsuitability of this residential location must be credibly resolved before this Plan Amendment or TPP status is progressed or approved.

- The proposed development, necessitated by the attempt to fit the Inner South Health Centre onto the current Griffith site, includes an **out-of-character, concrete, elevated parking structure**. This design element is grossly inconsistent with the established leafy, low-scale character that is residential in character dominated by pitched roof forms both. As such, this design outcome directly contradicts the principles outlined in the ACT Urban Design Guides³.
- The 'What We Heard Report'⁴ surveyed Inner South residents about desired services at the proposed ISHC, but the **feedback was clearly dominated by opposition to the proposed site**. Residents expressed concerns that the location was "not fit for purpose," "will ... not work," and that a Health Centre was not needed if it was at that specific location.
- Walter Burley Griffin's plan for Canberra placed 'village shops', such as the Griffith shops, in neighbourhood enclaves to address local needs. The selection and placement of these sites were, therefore, too restrictive in scope and are **ill-suited to serve the wide-ranging demands of the Inner South community**, which is the purpose of the Health Centre.
- To access the proposed site, **traffic will be pushed onto local residential streets and networks**. This will unnecessarily impact the residents and commuters accessing the ISHC from other suburbs.

Green Space, Character Protection and Height Restrictions:

The proposed rezoning of Blocks 33 and 39 Section 78 Griffith from Parks and Recreation (PRZ1 Urban Open Space Zone and PRZ2 Restricted Access Recreation Zone) to Community Facility Zone (CFZ) is opposed due to the resulting removal and destruction of valued green space and the subsequent erosion of the area's established Canberra character.

The development site includes a portion of a local park known as Throsby Park, which contains the Griffith Shops Playground. This green space is regularly accessed by local residents and is important for residents, native animals and birds. As the density of housing, including apartments and townhouses, increases in Griffith, existing green spaces become increasingly vital to the neighbourhood and community for providing accessible, local amenity.

The trees on the site are well-established native gum trees that provide sacred habitat for native wildlife and have been part of the Griffith landscape for generations. Given the ACT's identity as the "Bush Capital," there is clear inconsistency in this proposed development, which is intended to be keeping with the Inner South District Strategy that seeks to "capture and protect the valued character and attributes" of the district. Instead, this development will remove the green space that contributes significantly to the very character of Griffith and the Inner South. The proposed development is also inconsistent with the first of the five big drivers of the ACT Government's 2023 Inner South District Strategy that informs Territory Plan amendments.

³ ACT Urban Design Guide, page 32

⁴ https://yoursayconversations.act.gov.au/download_file/12156/3314

Alternative Sites – East Lake Place Plan:

The need for the Inner South Health Centre is undisputed; its location must be suitable to serve the broader Inner South community and align with the Centre's own objectives.

The ACT Government is simultaneously planning a large development known as 'East Lake,' which is proposed to include "residential and commercial mixed-use development...with opportunities for community facilities."⁵ As the ACT Government itself has noted, the East Lake area has been strategically important for urban growth and renewal since the 2004 Canberra Spatial Plan.

This makes the East Lake site a more strategic and appropriate location to house the ISHC, offering several significant advantages:

- It is already designated as a Community Facility Zone, eliminating the need for a major, contested rezoning and the compulsory removal of already limited public green space.
- The site is generally less constrained than the proposed Griffith site, involving fewer impacts on local character and heritage.
- Since the East Lake Place Plan is a broader development, integrating the ISHC would allow for a coordinated review and integration of the facility, ensuring it comprehensively meets the needs of the Inner South community.
- The site's location on major arterials (Canberra Avenue) and a commercial area will significantly limit the impact on Inner South residents, mitigating concerns related to light and noise pollution, security, and building constraints.

The ACT Government should thoroughly review the proposed plan amendment in light of the East Lake Place Plan. Considering how the ISHC would be better suited to integrate into a site strategically planned for community facilities would reduce the impact on highly valued local green space in Griffith, preserve the character of the existing local centre, and significantly mitigate traffic and parking concerns.

Procedural Failure and Vague Information

The ACT Government's approach to the ISHC has demonstrated a significant lack of procedural fairness and transparency with the Inner South community. The consultation documents contain fundamental contradictions, undermining the public's ability to provide effective feedback.

The provided documentation is inconsistent and misleading. For example, the Joint Media Release dated 7 October 2025 [1] hosted on the ACT Government website includes a direct quote stating: "...we know parking will be a significant consideration for the community and this is being taken into account in the design phase of the project."

Yet, the formal background documents supplied for public comment explicitly state that "detailed design considerations including car parking provisions will be addressed at the development application stage."

This contradiction is a major objection to the process. If parking is already being "taken into account in the design phase," then that design information must be disclosed. Conversely, if detailed design is truly deferred, the public cannot be expected to provide meaningful feedback on the current proposal.

⁵ <https://yoursayconversations.act.gov.au/east-lake-place-plan#:~:text=The%20plan%20includes%20key%20highlights%20such%20as%2C%20around%20heritage%20buildings%20and%20precincts>

The public consultation process on Draft Plan Amendment 06 (DPA-06) is fundamentally flawed because the amendment relates only to a zoning change, yet the accompanying background documentation provides specific, detailed development proposals. This includes:

- A Traffic Impact Assessment with modelling.
- An indicative site plan.
- Details on the number of practitioners proposed for the ISHC.
- A proposal for a deviation from existing planning guidelines.

By embedding these specific operational details within a consultation for a simple zoning change, the ACT Government has misled the community. The explicit statement that detailed design will be addressed later renders public comment on critical issues such as traffic, parking, and building impact ineffective and immaterial to the current process. This lack of clarity and procedural integrity diminishes the value of the entire consultation process.

This lack of clarity and procedural integrity is profoundly disappointing, particularly as the Inner South Health Centre is intended to be a community facility, funded by the community and designed explicitly to serve the community. The current consultation process gives the unfortunate impression that the ACT Government is proceeding with a predetermined outcome while ignoring the input and legitimate concerns of the very community the facility is being designed to serve.

From: [REDACTED]
To: [Terrplan](#)
Subject: Extension of Consultation Period DPA-06
Date: Sunday, 16 November 2025 5:15:12 PM

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Draft Major Plan Amendment (DPA-06)

Until this weekend, many of the residents closest to the proposed rezoning site for the Griffith Health Centre were unaware that consultation was underway or what it concerned. Residents opposite the park on Throsby, those at 1, 3, 5, 7, 9 and 11 Hacking Crescent—the properties nearest the site—and the three residents I have communicated with from Throsby Court public housing reported receiving no information about the current rezoning proposal.

No signage has been installed, and no printed material has been distributed.

This represents a significant consultation failure and warrants:

1. an extension of the consultation period
2. proper and comprehensive community consultation
3. a clear, transparent consultation process

Regards,

[REDACTED]
[REDACTED] NARRABUNDAH ACT 2064
[REDACTED]

Representation for EIS or Territory Plan Variation Notification_1 - Submission confirmation

Your submission has been successful. Please keep a copy of this receipt for your records.

Date and time

17 Nov 2025 7:24:17 AM

Reference code

MBW9C3BP

Access Canberra

GPO Box 158
Canberra City, ACT 2601

Phone: (02) 6207 1923
acepdcustomerservices@act.gov.au

Type of representation

About this form

Use this form to lodge a representation for a current amendment to the Territory Plan or a current Environment Impact Statement during the notification period.

Application type

Please select the application type:*

Territory Plan Amendment Notification

Representor details

Title

Given name*

Family name*

Organisation name

Enter at least one phone number: *

Home phone

Work phone

Mobile

Email address*

Application details

Amendment number*

Provide the details of your representation*

In relation to DPA-06 wish to raise concerns about: 1. The insufficient level of consultation that has occurred in relation to DPA-06. There has been no letterbox drop and no government or council representation at the local Griffith shops (which would have seemed reasonable and achievable). It appears that the only consultation to occur has been at the hands of the local community group and several concerned neighbours who have only just become aware of the proposal. This leads one to question ACT Government commitment to transparency. 2. The body of evidence that suggests this is the appropriate location both in relation to environmental impact with the removal of green zones and given we have reasonable geographic access to several large multi-purpose, appropriately zoned centres already - Manuka, Kingston being the most obvious. In relation to DPA-06, I would be grateful if the ACT Government would extend the courtesy of making itself available at the Griffith Shops on weekends (at which time there is most likely to be greatest access to the community) with visible signage and a willingness to take questions. I expect as part of this that it would be reasonable and proper to extend the consultation period to ensure that this has occurred. I would ask that ACT Government also consider the need to engage closely with residents who by proximity will be impacted including by an increase in foot and vehicle traffic, changes to access and privacy (including during and beyond construction). It may be that the Government is able to bring the community along, but so far there has been little indication or evidence that community needs have been considered, outside a top down decision about what is best. For your consideration.

You may upload any additional supporting documentation or photos.

- Maximum file size is 10Mb.
 - A maximum of 5 files can be uploaded.
-

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