

# 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 10:16:07 AM

Reference code

H54PPQMK

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\*

I support this amendment and the building of the Inner South Health Centre. I live very close by and appreciate having a closer health centre. I have two concerns both of which can be overcome through appropriate planning. The first is about the amount of parking allocated. Because I live close by, I see that the carparks either side of the Griffith shops, including where the health centre will be located, are often full. This has led to spillover in the streets [REDACTED] We need a lot more carpark spaces that are dedicated to the health centre workers and patients and they should not take away from the carparks for the shops. My second concern is regarding safe accessibility off Canberra Avenue to make it to the health centre. I regularly have to cross Canberra Avenue by bike and car, including close to St Edmund's and St Clare's and it is a dangerous move. There needs to be traffic lights to slow the traffic along Canberra Avenue. If people are to use the health centre, including people that are not from the area, they need to be able to do so safely. Any issues with the NCA must be dealt with rather than falling between the cracks. Thank you.

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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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.

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

## Exemption from the public register

To approve your request to exempt all or part of your representation from the public register the Territory Planning Authority must be satisfied that the part of the representation to which your exclusion application relates contains information that:

- (a) the publication of which would disclose a trade secret; or
- (b) the publication of which would, or could reasonably be expected to
  - (i) endanger the life or physical safety of any person; or
  - (ii) lead to damage to, or theft of, property.

**Please note:** Completing this section does not guarantee your application for exemption from the public register will be approved. A customer service officer will contact you to discuss any request for exemption from the public register.

Do you want to apply to have all or part of your representation excluded from the public register?\*

Yes  No

Are you applying for a full or part exemption from the register?\*

Full  Part

Provide details of your exemption request\*

Please provide detail which parts you wish to make exempt\*

[Redacted content]

# 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 11:27:22 AM

Reference code

YD25MW38

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

## Representer 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\*

This is in regard to Blocks 33 and 39, Section 78 Griffith - Inner South Health Centre. I'd like to oppose this Amendment on the basis that it will remove the existing carpark at the rear of the Shops. There is already limited car parking for the businesses in the shops and to remove what's there while adding a Health Centre will mean that there will be little to no remaining car parking for the tenants in the building. This car park has to stay or be extended to accommodate the new Health Centre. Easiest solution would be to put the Health Centre on the other side of the Block and leave the carpark as is.

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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# 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 11:55:09 AM

Reference code

L75ZQXH6

Access Canberra

GPO Box 158  
Canberra City, ACT 2601

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

## Type of representation

### About this form

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### 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\*

Blocks: 33 and 39; Section: 78 Division: Griffith We are the owners and occupier of the building, [REDACTED] We are opposing this development due to the lack of parking already existing for the Griffith shopping centre. If the proposed health facility is built to the rear of the shopping centre, this will cause increase demand for parking, which is very limited currently servicing the shopping centre. The removal of the current car parking will increase the pressure of lack of parking for existing tenants/owners and especially if the patients visiting the health facility parking.

You may upload any additional supporting documentation or photos.

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# 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 11:53:52 AM

Reference code

2T5K2P8L

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\*

You may upload any additional supporting documentation or photos.

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# 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 12:00:19 PM

Reference code

7B28LCV7

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

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'm a local resident in the area and i will be gravely affected by this proposed development. the govt has given ZERO consideration to the local people. The traffic conjection down throsby lane is already chaotic, and you are proposing a massibve medical centre and not only that, but buidling it on top of the car park? Have you tried to drive to griffith shops and pick up grociers? You can never get a spot. My poor wife who had a hip replacement often has to park around the back (where you are building the medical centre on top of) just so she can pick up our dinner. Discgusting. Zero foresight on your part. Relcoate it! And add parking - don't remove it!

You may upload any additional supporting documentation or photos.

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Do you want to apply to have all or part of your representation excluded from the public register?\*

- Yes       No

Provide details of your exemption request\*

let everyone know my comments on how dumb this proposal is!

**From:** [REDACTED]  
**To:** [Terrplan](#)  
**Subject:** Submission – Objection to Draft Major Plan Amendment DPA-06 (Inner South Health Centre Griffith)  
**Date:** Monday, 17 November 2025 12:09:30 PM

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You don't often get email from [REDACTED]. [Learn why this is important](#)

**Caution:** This email originated from outside of the ACT Government. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Please accept my submission in response to **Draft Major Plan Amendment DPA-06** and the proposed rezoning associated with the Inner South Health Centre in Griffith.

I support the ACT Government's goal of improving local health services and welcome the addition of an Inner South Health Centre. However, as a resident of Hacking Crescent whose property directly faces the proposed development site, I do not believe this is an appropriate location for a project of this scale.

The land identified for development currently provides important open green space, mature trees, and a natural buffer between the Griffith Shops and nearby homes. This space is used daily by families, children, dog-walkers and pedestrians moving safely between the shops and surrounding streets. It contributes meaningfully to the character of the area and offers much-needed visual relief for residents. The proposed rezoning and construction would permanently reduce this green space and remove the open outlook that defines the neighbourhood.

Traffic and parking impacts are also of significant concern. The number of new parking spaces proposed appears barely adequate to accommodate staff, with little or no allowance for patient or visitor parking. This shortfall will inevitably push overflow parking into surrounding residential streets, including Hacking Crescent. The street is narrow and, unlike Throsby Crescent and Strzelecki Crescent, has no speed bumps or traffic-calming measures, making it an easy shortcut and increasing the safety risk for children who walk, cycle and play in the area.

The combined effects of increased vehicle movements, parking overflow and the permanent loss of green space will materially diminish the safety, amenity and liveability of this quiet residential pocket. I am not opposed to the health centre itself, but strongly believe that a location which minimises the loss of established green space and avoids direct impacts on residential streets would serve the community far better.

Thank you for considering my submission.

Kind regards,

[REDACTED]

**From:** [REDACTED]  
**To:** [Terrplan](#)  
**Subject:** yoursay.act.gov.au - DPA-06: Proposed Griffith Community Health Centre  
**Date:** Monday, 17 November 2025 2:30:18 PM

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Caution: This email originated from outside of the ACT Government. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear Sir/Madam

I am writing to express my concern that the construction of the proposed Health Centre will be to the detriment of parking available to patrons of the Griffith shops.

The exiting car parking for the Griffith shops (both front and back) is only just adequate for the volume of traffic from visiting patrons.

As the centre will attract additional visitors to the areas, I urgently request that additional parking is created to prevent the Griffith shops losing clientele due to reduced parking.

Kind regards

[REDACTED]  
Narrabundah ACT 2604

**From:** [REDACTED]  
**To:** [Terrplan](#)  
**Subject:** Proposed Inner South Canberra Health Centre  
**Date:** Monday, 17 November 2025 3:40:49 PM

You don't often get email from [REDACTED] [Learn why this is important](#)

**Caution:** This email originated from outside of the ACT Government. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Ref: Draft Major Plan Amendment (DPA-06) Inner South Health Centre Project - Griffith

Dear Sir/Madam

I wish to draw to your attention that I consider the proposed project a waste of resources, principally because it will not meet the needs of inner south Canberra residents.

- It will **NOT be a nurse-led walk-in centre** like the one at Weston Creek.
- Appointments will be required.
- It will only be open during business hours, and not on weekends.

This is despite a "yoursay.act.gov.au" survey in July-August 2024 about residents' preferences for an Inner South Health Centre reporting that:

'Key areas of anecdotal feedback included the need for a nurse-led walk-in centre ... with many people commenting that they liked that service but had to travel to Belconnen, Dickson or Weston Creek to receive it. Many older people commented that there was no transport connections or links from the inner south to any of the Walk-in Centres, making them inaccessible unless driving.'

I understand that potential services have not yet been determined, but are likely to comprise the following:

- pathology (blood collection, etc).
- chronic disease management (e.g. podiatry, nutrition, physiotherapy, arthritis advice).
- dental (e.g. bariatric chairs).
- breast screening.
- group exercise and education programs (e.g. cardiac, heart failure, pulmonary rehabilitation).

However, public provision of many of these services (particularly dental treatment) generally requires patients to be holders of a government concession card. This will exclude many local residents. Moreover, apart from a possible X-ray facility and ultrasound, specialised radiology services like Magnetic Resonance Imaging (MRI) and CT (computed tomography) scans are not likely to be installed.

The Government appears to have pre-determined that a new building is required behind the Griffith shops. However, the diversity of the services to be offered suggests that a less centralised model may be cheaper unless significant economies of agglomeration can be reaped. Leasing separate sites would likely be cheaper than a large new construction. Suitable sites exist in Manuka and Kingston.

Rather than leasing or refurbishing existing buildings, an even cheaper option may be to contract out services to the many inner south private providers of oral and dental care, radiology, physiotherapy, and related services. Duplication of existing private services in a public facility is wasteful of resources, and the Canberra hospital already refers patients to private providers if its own staff and equipment are not able to care for large numbers.

A genuine consultation process requires the ACT Government to release for discussion an analysis that compares all the social costs and benefits of alternative means of providing the inner south with health services, including a nurse-led Walk-in centre. I would urge the relevant

authorities to give serious consideration to this.

Sincerely,

[REDACTED]  
[REDACTED]  
[REDACTED]

**From:** [REDACTED]  
**To:** [Terrplan](#)  
**Subject:** DPA 06  
**Date:** Tuesday, 18 November 2025 6:46:37 AM

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**Caution:** This email originated from outside of the ACT Government. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Good morning,

Please find my submission for DPA06 set out below.

### **Submission:**

I strongly object to Draft Plan Amendment 06 for the Inner South Health Centre at Griffith Shops. While I support a health centre, this proposed site is completely wrong for the Inner South community. The location is fundamentally incompatible with the area's existing character and infrastructure.

- The site is poorly chosen; health facilities meant to serve the broader region shouldn't be in the middle of a suburb. Major centres belong on arterial roads to avoid sending commuter traffic down residential streets. The plan offers only 2.23 parking spaces per practitioner, which is less than half the required four spaces. This project needs 168 new spaces, accounting for the 56 existing overflow spaces it will remove. Without resolving the parking deficit, which is a fundamental issue, the plan can't move forward.
- The council's own survey found residents mostly opposed the site, saying it wasn't fit for purpose. Walter Burley Griffin designed the Griffith Shops as a local enclave, too small for a major health centre serving the entire Inner South. Traffic accessing the centre will unnecessarily strain local residential streets. The approach the ACT Government has taken to date gives the unfortunate impression that the government is proceeding with a predetermined outcome. They are ignoring the legitimate concerns of the community this facility is meant to serve.
- Rezoning Blocks 33 and 39 from parkland to a community facility zone destroys valuable green space. This development includes part of Throsby Park and its playground, an important local amenity. Losing established native gum trees removes sacred habitat for wildlife and erodes the area's character.
- The development contradicts the Inner South District Strategy, which is supposed to protect the area's valued attributes. Why not build the health centre at East Lake? That site is already designated for community facilities and avoids all the contested rezoning.
- East Lake is less constrained and its location on Canberra Avenue will minimize noise and light pollution for existing residents. Integrating the health centre into

the larger East Lake Place Plan would ensure proper provisions for parking and community needs. The government should thoroughly review the East Lake option, which is clearly a better fit.

Kind regards,

A solid black rectangular box used to redact the signature of the sender.



## Inner South Canberra Community Council

Territory Planning Authority  
GPO Box 158  
Canberra ACT 2601  
terrplan@act.gov.au

Dear Planners

### **INNER SOUTH CANBERRA HEALTH CENTRE**

The ISCCC is grateful for the opportunity to comment on this issue.

#### **Preamble**

We naturally support investment for the development of Canberra's Health Services, given especially the Treasury's forecast that the population of South Canberra will increase by 60% by 2065. Indeed, we are greatly concerned that the Government's need to fund its proposed expenditure on prestige projects such as the Light Rail extension, new Theatre and Convention Centre, will crowd out necessary expenditure on essential services including health. Available capital expenditure therefore needs to be allocated with great care.

The local community was led to expect a "Walk in" Health Centre with nursing or better still GP care, and this possibility generated local support for the proposal. However, this is not what is on offer. Instead, we are offered a set of loosely connected specialist services such as are already available from private providers at a number of locations in the City and suburbs, such as the mini health precincts at City West, Barton and now at Manuka. This change of proposed use for the Health Centre calls into question the required capital expenditure, and the social cost of the proposal in terms of lost parkland, the (as yet unknown) destruction of mature trees and the adequacy of parking provision. Doubts remain as to the proposed location, which is not easily accessible by public transport in the Inner South, and whether indeed the proposed services could not be provided at less financial and social cost by distributing them around suburban locations, on a similar pattern to private provision.

The submission which follows explores these issues in more detail. We ask that the Government give careful consideration to the points raised in it.

## What is the Inner South Canberra Health Centre?

A new Health Centre for the inner south was proposed<sup>1</sup> in the lead up to the 2020 election. The services to be offered remained vague, and little was heard of the proposal until just before the 2024 election, when the Health Directorate announced that an Inner South Canberra Health Centre was to be built in Throsby Park Narrabundah, unfortunately just where City Services had recently announced the construction of a storm water retardation basin. The nature of services to be delivered, and its opening hours were not specified.

While the location of the Centre was being sorted out the Government conducted popup consultations in July 2024 about what services the Centre should offer. Most members of the public believed that the proposed Centre would be Walk In, as suggested in the 2020 Health Policy Position Statement which notes at p.5 “Canberrans love nurse led Walk-in Centres because they provide great care... every day of the year with no appointment needed”.

In July 2025 the Government announced the location of the Centre would be on Blocks 39, and 33 and part of Block 34 of Section 78 Griffith. This was followed by the release in October 2025 of the Draft Major Plan Amendment to the Territory Plan 06 (MPA 06) relating to the rezoning of Blocks 33 and 39 Section 78 Griffith from their existing zonings to CF Community Facilities.

Recent Government statements have made it plain that the centre will not be Walk In, but accessible by appointment only, with access restricted to office hours only. Many of the public will no doubt be disappointed by this significant retreat from what was implicitly promised, with its greatly reduced availability (40 hours per week compared with 101½ hours for a centre that operates from 07.30 to 22.00). There will probably also be disappointment at the absence of any GPs at the Centre. These changes can be expected to greatly reduce enthusiasm for the proposed Centre, and may lead some to question whether what we are now promised is worth the loss of parkland and the threat to the continued success of the Griffith shops, which serve customers who drive from all over Canberra.

The Supporting Statement for DPA 06 indicates that the services offered will include:

- ACT Pathology collection services
- Chronic Disease Management – Consult and Treatment Rooms
  - Nursing
  - Podiatry
  - Nutrition
  - Physiotherapy
  - Rapid access clinics

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<sup>1</sup> Labor’s Health Policy Position Statement, p.6 “A re-elected ACT Labor Government will build on our successful nurse-led Walk-in Centres and Community Health Centres with five new local walk-in health centres” and “The local walk-in health centres will be delivered in areas of future growth and need outside our town centres: South Tuggeranong, West Belconnen, the Inner South and North Gungahlin”

- Dental services
  - Dental chairs
  - Special needs dental chair
  - Bariatric dental chair
  - Dental laboratory
- BreastScreen ACT
- Various multidisciplinary group exercise and education programs, which may include cardiac, heart failure, and pulmonary rehabilitation services.

Construction work on the Centre cannot commence until City Services have completed construction of the Storm Water Retardation Basin project, to be located at the present site of the Children's Playground in Throsby Park. This is not expected to start until the second half of 2026, allowing commencement of works on the Health Centre sometime in the first half of 2027. The Centre is expected to open in 2028.

### **Why build an Inner South Canberra Health Centre?**

The services to be offered appear to offer few economies of scale by being located in one building. This prompts the question why spend \$22m, or whatever the Government estimates the Centre will cost, just to have all these services in one place? It seems that pathology collection, podiatry, nutrition advice, physiotherapy and dental services could all be offered perfectly satisfactorily from different premises, just as they are when offered by private service providers.

It seems likely that there would be enough empty premises in the several Group and Local Centres in the Inner South to allow such a dispersed model to work, particularly if the Government does not insist that all the necessary premises must be secured on a single day, or that all services start simultaneously. The total area required to house the service delivery elements of the Centre appears to be about 1,500m<sup>2</sup> which should not place too much strain on inner south commercial real estate. Given the ACT's parlous financial situation many might think that the Government owes the ratepayers a detailed explanation of why this approach has (apparently) not been fully explored.

It would reassure the public that the Government was acting responsibly if it could release a detailed business case explaining why co-location of the varied services to be offered by the Health Centre is demonstrably the best course of action.

### **Where?**

The Government seems to be focussed on locating the Centre in Throsby Park. The announcement of the Centre location before establishing that the low-lying site had such severe drainage problems that City Services proposed to convert it to a Stormwater Retardation Basin suggests a possible lack of due diligence.

Given that there is a significant fall (about 2m) across the site from Block 39 (next to Blaxland Park) down to Block 34 (next to Throsby Crescent) and a similar drop from the level of Barker St in front of Griffith shops, there is scope for the Centre to be redesigned to provide access at the Barker St level while possibly decreasing its footprint through using a two-storey or multi storey-structure.

We understand that the Griffith Narrabundah Community Association (GNCA) has suggested that the Community Facility land in Manuka adjacent to MOCCA would be a more central location for the Health Centre, but that the Government has rejected this “Due to constraints relating to the site”.<sup>2</sup> Some with long memories might recall Government enthusiasm for redeveloping this area for housing as an offshoot of the unfortunate proposal to encircle Manuka Oval with seven storey high residences in 2015, and these memories might lead to curiosity as to what the future of this Community Facility land is.

Given that the Throsby Park site behind the Griffith shops is also subject to constraints, a more balanced and fuller comparison of the pros and cons of each site would be desirable. Such a comparison could usefully include other potential sites such as a small area somewhere in the large area of land designated the Arts Precinct in Kingston Foreshore, or in Eastlake in the old railway yards east of Cunningham St. We understand that the Government has prepared a Site Report which examines options and justifies the selection of the Throsby Park site, but this has not been released by the Government.

It would be helpful if the Government could release this Site Report to demonstrate that all reasonable alternatives were fully and impartially considered during the process leading to the decision to locate the Centre in Throsby Park. Some explanation of why it was felt acceptable to alienate an existing portion of Throsby Park (see below for details) would also be welcomed.

When considering the suitability of Throsby Park as a site for the Health Centre it should be borne in mind that this is by no means central to the Inner South, and is not particularly well served by public transport, with only one bus going along Stuart St.

The Supporting Statement suggests that the distribution of dental health patients might favour a Griffith location for the Centre as more central for this group. It says at p.3 that “The inclusion of dental services in the Inner South enhances accessibility for the community” and “Demographic data shows that the highest number of eligible adult clients for oral health services are concentrated in the south of Canberra”. This is relatively opaque: the south of Canberra is usually taken to mean anywhere south of the Lake down to Banks in Tuggeranong. If this is what is meant a dental facility in Woden or Erindale would probably be more effective at delivering care with the shortest trip time. If the inner south is meant it should say so.

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<sup>2</sup> Supporting Statement for MPA 06, p.28

It is also not clear whether this need for dental services merely reflects the demographic fact that residents in the southern part of Canberra (average age 38.47yrs) tend to be older than those in the north (average age 33.96yrs). If, however, “eligible adult clients for oral health services” is code for residents who qualify for public dental care, bearing in mind that Medicare does not cover dental work, then we might suspect that many in this group might live in Narrabundah east of Sturt Avenue. This area now has a larger proportion of public housing than most other parts of Canberra, particularly so after the Government sold Gowrie Court, the Stuart Flats and the Red Hill flats and did not replace these with an equal number of public dwellings in these localities.

If Narrabundah east of Sturt Avenue does host the largest concentration of eligible dental patients in Canberra, then it would seem most logical to locate any proposed dental facility at the Narrabundah shops, so that locals can access it without having to drive or catch the bus. In this regard, some system of subsidised taxi or uber service from Oaks Estate to allow eligible patients to travel for treatment without transport costs would be a worthwhile spend of Government funds.

### **Alienation of Parkland**

There is an issue with the proposed Throsby Park site in that using the whole of Block 33 will require that some 773m<sup>2</sup> of PRZ1 Land currently forming part of Throsby Park is to be rezoned to Community Facility land, in addition to the land in Block 33 and 34 that is currently used for car parking for the Griffith shops. The site will also include Block 39 which while zoned PRZ1 is surrounded by a wire mesh fence and has never been available as parkland. The last use of this site was as a storage facility for possibly asbestos contaminated furniture removed from condemned Mr Fluffy houses. Consequently, any soil testing proposed for the former tennis courts in Block 33 should also be extended to Block 39.

It would be desirable for the design of the Centre to be reconfigured, as touched on above, or simply relocated to a different site, to allow the 773m<sup>2</sup> of parkland to be retained. Or replaced with an equal area of parkland somewhere in the Blaxland Park/Throsby Park area.

Related to this issue is the desire of local residents that any Health Centre building not interrupt the existing easy movement between Blaxland Park to the north and Throsby Park to the south. It would consequently be helpful if the Centre could include a path linking the two parks on its northern side on the boundary with Bishopsbourne Court,.

### **Trees**

As there are a number of trees on blocks 33, 34 and 39 it would be impossible to build on the proposed site without the loss of at least some trees. In the absence of an Arborist’s Report and tree survey it is not possible to determine the likely number of trees to be removed, nor their species, size, age, health and general quality.

An attempt to estimate the number of trees under threat suggests this would likely be more than 20 but less than 30. But we just don't know.

Clearly it would be desirable to keep as many mature trees on the site as possible, and we look forward to cooperating with the Government to achieve this. In this regard it is possible that some of the area proposed for car parking could possibly be retained as treed parkland if other land nearby could be converted to parking space. The upper end of Throsby Lane leading up to the entrance of Block 39, which will now no longer be used for that purpose, looks a possibility.

It would be helpful if the Government could release the Arborist's Report and tree survey, which clearly exists as one can see that the trees have been numbered in the Plan released by the Government. This would reassure the public that all possible steps had been taken to preserve all the higher quality mature trees now growing on the site.

## **Parking**

The amount of parking likely to be needed by the Centre, and whether there might be a shortage of parking for visitors to the shops following construction of the Centre, is one of the focusses of the Traffic Impact Assessment Report (Traffic Report).

The Traffic Report is a great disappointment. It is lengthy, turgid, and hard to follow. Its conclusion that the traffic induced by the Centre will not be a major problem for neighbouring streets appears reasonable. But the section devoted to parking appears intent on diminishing the parking space demand that the Government will need to be concerned about. Overall, the estimate of parking required is not convincing, and leaves the reader with little confidence that there will be enough parking after construction of the Centre to be certain that existing businesses at the Griffith shops will not suffer loss of trade through inadequate parking.

The report reads like one prepared by a property developer where the profits depend, at least in part, on minimising the number of parking spaces that must be provided. However the task in this case is different, or so we presume. The Government shouldn't want to know the maximum number of disappointed parkers seeking to shop at Griffith shops it can get away with. On the contrary, it presumably does want to know how much parking has to be provided at the Health Centre to ensure that those who currently drive to Griffith to shop are not driven away because they cannot find a parking space. Some proportion might accept parking in a nearby side street and walking to their favoured shop, but many others will just drive on to either the Manuka or Kingston Group Centres, each only a little more than 1.5km away from Griffith.

The authors of the Traffic Report rely on 10 year old figures from a number of sites in NSW with no evidence that they are in any way comparable (number, type and range of services, hours of opening, availability of GPs and other specialists) to the proposed Health Centre. We feel it would have been far better, and the results much more convincing, if the authors had undertaken some very simple research at the site in question, simply observing how existing parking varied during the course of the day, and also asked the Health Directorate to provide (or obtain) data from its current health centres about parking demand generated by these centres.

In the absence of such locally based data the Government should ignore the Report's laboured attempts at explaining why less parking is required, and merely rely on the 4 parking spaces per practitioner required by the Technical Specifications for Community Facilities, which is the same as that required in the formerly applicable Parking and Vehicular Access Code. . Or perhaps better still, reject the Traffic Report and engage a local firm (or perhaps an Engineering or Architecture school at one of Canberra's universities) to collect relevant data, as suggested in the previous paragraph.

## **Recommendations**

The ISCCC recommends that the Government

1. Reconsider making the Centre Walk In, and extend the proposed hours to 07.30 to 22.00 seven days per week;
2. Release the Business Case demonstrating that it is convenient and desirable for the diverse services to be provided by the Centre should all be co-located in the same building;
3. Release the Site Report justifying the selection of Throsby Park as the site for the Health Centre;
4. Give serious consideration to alternative site for the Health Centre, but also consider disaggregating the Centre, with the Dental Unit, for example, being located at Narrabundah shops;
5. Make arrangements for subsidised (preferably free) transport for the residents of Oaks Estate so that they can actually benefit from any of the services to be provided by the Health Centre, wherever it is eventually located;
6. Release the Arborist's report and tree survey; and
7. Either ask the authors of the Traffic Report to redo their assessment of likely parking demand, or commission another consulting group to perform this, charging it with basing its conclusions on locally collected data.

The ISCCC thanks you for the opportunity to discuss this issue

Yours faithfully

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Chair  
ISCCC  
18 November 2025