

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

18 Nov 2025 3:21:26 PM

Reference code

D9542PRH

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

Private Resident

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.

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

Disclaimer

Your personal information will be managed in accordance with the *Information Privacy Act 2014* and the Environment, Planning and Sustainable Development Directorate (EPSDD) **Information Privacy Policy**, which is available for viewing on EPSDD's website.

Copies of written comments will be made available on the authority website unless the submission is withdrawn.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** to arrange a copy for purchase.

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

From: [REDACTED]
To: [Terrplan](#)
Subject: RE: Draft Response to ACT Government – Griffith Health Centre Proposal - DPA-06
Date: Wednesday, 19 November 2025 1:59:20 PM
Attachments: [Draft Response to ACT Government.pdf](#)

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.

To the Territory Planning Authority,

My address that supports my response is [REDACTED] Narrabundah, ACT, 2604.

Regards,

[REDACTED]

[REDACTED]

Email [REDACTED]

From: [REDACTED]

Sent: Tuesday, 18 November 2025 6:21 PM

To: 'terrplan@act.gov.au'

Subject: Draft Response to ACT Government – Griffith Health Centre Proposal - DPA-06

To the Territory Planning Authority,

I am submitting a formal response to Draft Major Plan Amendment 06 – Inner South Health Centre, expressing serious concerns about the proposal to rezone open space in Griffith for a large health centre.

The public consultation has been inadequate, with minimal community engagement, no letterbox drops, and most residents left unaware of the proposal's details or impacts.

The government's own report shows very low participation and key issues such as parking congestion, traffic safety and the loss of valued green space have not been addressed.

The proposal risks worsening parking and congestion around the Griffith shops, undermining local amenity and safety.

I urge the ACT Government to extend the consultation, provide clear information to all residents, and reconsider the location to protect our parks and community character.

Regards,

[REDACTED]

Resident Directly Impacted [REDACTED])

Draft Response to ACT Government – Griffith Health Centre Proposal

There are serious concerns regarding the ACT Government’s proposal to rezone open space (PRZ1) and recreation zoning (PRZ2) for the development of a large Health Centre in Griffith, with over 50 staff. The public consultation process has been inadequate and inconsistent, and there has been a noticeable lack of effort to engage the community meaningfully.

Insufficient and Ineffective Public Consultation

Despite the significant impact this development will have on the neighbourhood, most residents remain unaware of the details. According to the government’s own “Consultation Listening Report,” only 105 survey responses were received out of over 1,100 people reached via YourSay, and just 75 people attended face-to-face sessions. This is a tiny fraction of the affected population and demonstrates that the consultation failed to reach or engage the broader community in any meaningful way.

There has been a lack of visible signage, letterbox drops, or clear communication about the proposal and its implications. The report confirms that the main methods of engagement were online surveys, a handful of pop-up sessions, and some social media advertising. There is no mention of any letterbox drops or direct mail to residents, meaning many people—especially those not active online or on social media—were left uninformed. The government claims to have emailed “key stakeholders,” but this is not a substitute for direct engagement with all residents.

Furthermore, the consultation period was short (just six weeks), and the process has now gone quiet, with the consultation period closing soon (19 November 2025). There is a real risk that community voices will not be adequately heard or considered.

Parking and Traffic Issues

The majority of streets around the Griffith shops and surrounding housing already experience permanent parking congestion. These streets are not wide enough for cars to pass safely as it is. For example, on Frome Street, two neighbours with large vehicles parked opposite each other have created a situation where cars struggle to pass, leading to frustrations and several close calls with near-accidents. Residents have also been inundated with student parking from Saint Clare’s and Saint Edmund’s schools, which regularly blocks the streets during the week.

With the proposed health centre, which will bring over 50 staff and 50 to 100 visitors, the parking situation will only worsen. The centre’s parking plan is inadequate, with only a net gain of 63 spaces and just 4 designated for disability access. In reality, the number of usable spaces will be even less due to the space required for disabled parking. Overflow parking will inevitably spill into already congested and narrow local streets,

increasing the risk of accidents, potentially fatal ones, due to the inability of vehicles to pass safely.

The government's own report acknowledges community concerns about parking and traffic, with multiple comments highlighting that "Throsby Lane is very narrow and regularly blocked by deliveries to the shops," and that "current parking in Griffith shops is not fit for purpose." There is also clear feedback that "attention will be needed to ensure that adequate parking is provided to service both the centre and the shops," and that "preservation of pedestrian access through and between Throsby and Blaxland Parks and the shops" is important. These concerns have not been addressed in the proposal.

Residents of Narrabundah and Griffith have endured enough parking frustrations and the addition of a large health centre will only exacerbate these issues, putting the safety of the community at risk.

Rezoning and Loss of Green Space

The proposal involves rezoning land currently designated as Urban Open Space and Recreation, which is vital for community wellbeing and environmental health. The selected block is surrounded by large, healthy trees and is used as open space. The loss of green space for a large health facility sets a concerning precedent and undermines the character of Griffith. Trees that have taken 20-50 years to grow will be removed.

Conclusion

This is a major change for Griffith and the lack of robust, transparent consultation is unacceptable. The ACT Government is urged to extend the consultation period, provide clear and consistent information to all residents—including letterbox drops and signage and genuinely consider alternative locations that do not compromise precious green space. All residents are encouraged to make their voices heard before consultation closes on 19 November 2025. Parking on site is a major concern, this will distract from the shopping precinct. If you cannot find a park onsite at the shops, people will drive away, impacting local traders.

Protect our parks. Protect our green space. Demand proper consultation.

From: [REDACTED]
To: [Terrplan](#)
Cc: [REDACTED]
Subject: DPA-06 Inner South Health Centre
Date: Tuesday, 18 November 2025 6:58:46 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.

I would like to provide the following brief comments in relation to the proposed rezoning of current open space (PRZ1) and recreation zoning (PRZ2) behind Griffith Shops to construct a large 50+ employee Health Centre.

I do not support this rezoning and construction on the following basis:

1. Based on the Government's election promise, we understood that the Centre would include a nurse-led walk-in clinic. We now know that this is not the case.
2. Building this Centre as proposed would compromise a far amount of green space which, in a previous term, the Labor Government pledged as ongoing green space not to be used for other purposes. This project betrays that pledge.
3. Griffith shops and the green areas adjacent are a small, local community hub. Unlike Manuka and Kingston it is not a regional centre where people come to access a range of services. To build the proposed large health centre and the infrastructure required to support such a centre would destroy the fabric of this community as well as some of the green space that has been hard-fought for and is heavily used. It would severely compromise the services that are already here and limit our access to our local shops.
4. The Centre would be far better situated in existing centres which have better infrastructure, such as Manuka, Kingston or Narrabundah (where Winnunga already provides a range of health-care services). These centres are already familiar to people who might access the services and are easily accessed. In addition, the impact on these centres would be proportionately far less than on Griffith shops.
5. There is nothing about the centre that intrinsically requires it to be located behind Griffith shops. In fact, as argued above, it would be better situated in one of the established regional centres nearby.
6. Based on the plans, it seems unlikely that there will be sufficient parking provided. This will place unacceptable pressure on nearby streets, many of which are already quite narrow. It will also compromise safety for residents of the nearby residential aged care facility and the students at nearby schools.
7. In a well-reasoned policy, the proposed location of this centre makes no sense at all other than as an easy land-grab.

[REDACTED]
Griffith, ACT, 2603
[REDACTED]

Territory Plan and Coordination Section, CED
terrplan@act.gov.au

19 November 2025

Submission to Draft Plan Amendment O6 and Proposed Territory Priority Project Declaration - Inner South Health Centre

We welcome the opportunity to participate in this consultation process.

We **support** the draft Major Plan Amendment and the proposed Territory Priority Project (**TPP**) Declaration for the Inner South Health Centre.

We are excited to see a proposal for a substantial new community based health service in the Inner South. A significant number of our members, including the authors of this submission, live in Griffith, Kingston, Barton or other Inner South suburbs, and have a direct personal interest in better health facilities in the Inner South.

We see numerous benefits to this new facility:

- The site is ideally located to provide health services in a district that has experienced significant population growth while being underserved by such facilities
- The new facility will reduce the need for expensive hospital care and take workload away from overstretched hospital facilities, through appropriate preventative and primary care provided in a community setting
- The site is close to the R6 bus route, a rapid service that provides easy access to the centre and links it to the Canberra Hospital, and the 56 local route which connects it with the Winnunga Nimmityjah Aboriginal Health and Community Services.

The proposed centre was the subject of significant community consultation which concluded in 2024.

Major Plan Amendment

We support the proposed Major Plan Amendment.

The amendment will, regrettably, result in the loss of a small portion of the existing PRZ1-zoned parkland. However, the modest loss of open space is proportionate to the significant community benefits of the proposed facility. The impact will be minimised by the care taken to preserve the high value trees in the area and will result in an increase in local tree planting.

We note the findings of the Traffic Impact Assessment Report that parking demands can be comfortably accommodated at peak times. The proposal will result in a net addition of 63 parking spaces. Requiring any more parking on this site would come at the cost of facility floor space, or further intrusion into the park. Staff and patients (who are physically capable) should be encouraged to make use of the excellent public transport provision where possible to reduce parking demand. (We note our long-held concerns that unreliable parking study data has led to significant overprovision of parking for some land uses in other jurisdictions.)

We agree with the observations in sections 3.1.1 to 3.1.5 of the supporting report that DPA-06 aligns with all the themes of the *ACT Planning Strategy* to achieve a compact, efficient, liveable and accessible Canberra. We also consider the new facility will provide additional patrons for the nearby Griffith Shops.

In response to section 3.2 of the supporting report, we generally agree with the report's observations regarding alignment with the *Principles of Good Planning*, but we further believe that the housing affordability principles are applicable to this proposal. The housing affordability principles support planning that "*ensure[s] affordable housing is close to essential services*". The amendment will provide essential health services to the community, including for public housing tenants nearby in Griffith and Narrabundah. High-density housing of all types is also playing an increasingly important role in addressing our housing affordability crisis, and the Inner South is becoming a high-density area - providing vital community facilities such as the proposed centre in the Inner South is important for improving the diversity of housing choices for Canberrans who require these health services.

Territory Priority Project Declaration

For the same reasons that we support the Major Plan Amendment, we also agree a TPP declaration is appropriate for the Inner South Health Centre. The proposal is a significant facility for the ACT that clearly satisfies the statutory criteria by achieving the objectives of the *ACT Planning Strategy*, and other government policies such as the *ACT Health Services Plan*. Delivery of this facility should be a priority unencumbered by the financial and delivery risks posed by ACAT review.

About Greater Canberra

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

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

Questions on this submission can be sent to greatercanberra@gmail.com.

From: [REDACTED]
To: [Terrplan](#)
Subject: Comment on Inner South Health Centre TPP Declaration and DPA
Date: Wednesday, 19 November 2025 12:52:39 AM

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

As a Griffith resident, I write in support of the declaration of the Inner South Health Centre as a Territory Priority Project, and in support of the associated Draft Plan Amendment.

The Inner South needs this facility. When I suffered a significant injury last year, for several weeks I had to make regular use of community nursing services and the walk-in clinics. This meant travelling to Civic, Weston Creek, and even as far as Gungahlin, which I did mostly using public transport. While the Civic community health facility isn't too far from Griffith, the other centres are much too far. A new health centre will be significantly easier to access and provide additional capacity for the health system while increasing the diversity of options. As we look towards the future, with the population density of the Inner South continuing to increase in line with the ACT Planning Strategy, this will only become more necessary.

I believe this project clearly satisfies the requirements for the declaration of a Territory Priority Project.

With regards to the Draft Major Plan Amendment, the loss of a small area of green space is unfortunate, but there aren't many great options for the Territory to deliver a facility of appropriate scale without developing on some green space. I am sure there will be feedback that this development doesn't provide enough car parking - but more car parking means more impact on the green space. I think it's an acceptable compromise.

Yours sincerely

[REDACTED]
[REDACTED] Griffith ACT 2603

--

[REDACTED]

From: [REDACTED]
To: [Terrplan](#)
Subject: Objection to Proposed Rezoning - Draft Major Plan Amendment (DPA-06):
Date: Wednesday, 19 November 2025 7:58:34 AM

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.

To whom it may concern,

I am formally objecting to the proposed rezoning associated with DPA-06. My concerns relate to three key issues: the loss of valuable green space, inadequate parking provision, and a flawed community consultation process.

loss of green space

The area identified for rezoning currently serves as an important and well-used green space for local residents. It provides recreational value, contributes to neighbourhood amenity, and supports the wellbeing of nearby families, children, and older residents. Reducing this green space would have a detrimental impact on community liveability and contradicts broader planning principles that emphasise accessible public open space in established suburbs.

inadequate parking and traffic impacts

The proposed development is likely to generate significantly higher parking demand than the surrounding streets can safely accommodate. Local roads are already under pressure, and increased congestion would negatively affect residents, pedestrians, and cyclists. Without a clear and realistic parking and traffic management plan, the redevelopment risks creating ongoing access and safety issues for the neighbourhood.

flawed consultation process

The consultation process to date has been insufficient and inequitable. Many of the residents closest to the site were unaware that consultation was underway, as no signage was installed and no printed information was distributed to affected households. Key groups—including residents of Throsby Court and homes directly adjacent to the site—did not receive adequate notification. This represents a significant process failure and undermines the legitimacy of the current consultation outcomes.

Given these concerns, I request that the rezoning proposal be reconsidered. At a minimum, the consultation period should be extended and a proper, inclusive consultation process undertaken to ensure all affected residents have the opportunity to meaningfully participate.

Thank you for considering this submission. I look forward to a response addressing the issues raised.

Yours sincerely,

[REDACTED]

[REDACTED]

Narrabundah ACT 2604

[REDACTED]

Draft Major Plan Amendment (DPA-06):

From: [REDACTED]
To: [Terrplan](#)
Subject: DPA-06 / Concerns regarding the employee health center behind Griffith Shops [SEC=OFFICIAL]
Date: Wednesday, 19 November 2025 3:08:02 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.

OFFICIAL

Dear Territory Planning team,

I hope that your day is going well. I am writing regarding the proposal to develop a health centre next to the Griffith shops.

My name is [REDACTED] and I live at [REDACTED], Griffith, with my partner and [REDACTED] year old son.

It's great that the ACT Government is looking at this space. It's underutilised and in need of investment. However, I'm not supportive of the proposed development. The Griffith shops and surrounds have plenty of open space. It is what convinced me to buy a property there. However, these spaces have become uninspiring - filled with weeds, small struggling trees, and aging/outdated play equipment. With a bit of investment and vision, these spaces could be transformed into places where residents (young and old) again enjoy spending time – bringing even greater business to the shops. Farrah shops, and the nature-based playground, provide a great example of where this has been done.

We already have the large, aged care facility (who's air conditioners make a terrible racket at all hours) and which doesn't fit with the aesthetic of the suburb or add to its social fabric. The current proposal appears to be more of the same, further eroding the charm of Griffith shops. Instead, the space should be used to improve the amenities available to residents (and visitors) by providing a green social / play area, with a focus on making it a more child friendly suburb (this is decreasing as it goes increasingly high-rise). If not park, then an area for public performances, could be a great addition.

Thank you for consulting and I look forward to a revitalisation of the shops


Always happy to elaborate on any of the points above.

P.S. I was sorry to hear the preschool and relocation of FAPS were unsuccessful – they would have been good additions to this area.



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

Submission 27


info@gnca.org.au

Dear Planners,

REZONING OF PARKLAND (DPA-06) AND THE INNER SOUTH CANBERRA HEALTH CENTRE

1. The Griffith Narrabundah Community Association (GNCA) is grateful for the opportunity to comment on this issue. This submission replaces that from the GNCA on this issue previously lodged on 19 November 2025.
2. The Government announced its intention to build a walk in Health Centre in Inner South Canberra, similar to those in other parts of Canberra, before the 2020 election. The Centre is to be located in Throsby Park behind the Griffith shops. To implement the project some areas zoned PRZ1 (Urban Open Space), currently regarded as part of Throsby Park, as well as an area zoned PRZ2 (Restricted Access Recreation Zone) must be rezoned to CF Community Facility land. The Government has commenced consultation on the required Major Plan Amendment for this rezoning (DPA-06) As the Minister has foreshadowed that the Government is considering declaring this project a Territory Priority Project, thereby curtailing any further real opportunity to comment, we hope we will be forgiven for including issues related to the Health Centre which do not solely focus on the rezoning issue.
3. The GNCA welcomes the idea of a new Health Centre for Inner South Canberra, and believes that if it were implemented appropriately this could bring many benefits to the residents of the inner south. Many believed, following the Government's early announcement, that the Centre would be Walk in, with the long hours and open on weekends features familiar with other Health Centres in other parts of Canberra. These people are therefore surprised and disappointed to find that what is proposed is an appointment only, office hours on weekdays facility, with what appears to be a major emphasis on dental services which will not be available to any but the small number of people that qualify for government funded dental services. Many of the other services offered are only available under Medicare if prescribed by a GP.



4. This unexpected change in focus has led at least some to wonder whether the Centre, with its consequent loss of parkland, mature trees, and threats to parking at Griffith shops, is really worth the benefits that it might bring. Others wonder whether the Centre's objectives might be better achieved at another site, or whether these objectives could be better achieved at a lesser cost than the rumoured \$22m for the Centre.
5. The DPA-06 document itself does not argue the case for the rezoning of parkland. It merely notes (p.1) that "*The zoning change will enable the development of the Inner South Health Centre on this site*", and at p.3 that "*The rezoning will enable the development of the Inner South Health Centre at the proposed location within the Community Facility zone*" and at p.6 that "*The proposed rezoning of the site to Community Facility Zone would facilitate the delivery of health care services to the local community*".
The GNCA does not regard the repeated presentation of the same comment as a persuasive argument. No balanced assessment of the pros and cons of the proposed rezoning is offered, it seems to be assumed that the construction of *this* Health Centre with its specific mix of services, located at *this* site, is so obviously a good thing to all parties that no further consideration is warranted. The closest we get is where the DPA-06 document indicates under "**2.3 Justification against the Act**" at p.6, that "the positive and negative impacts of the proposed amendment" will be outlined in the supporting report.
6. The two documents released in support of DPA-06, the Supporting Report, and the "Traffic Impact Assessment Report" (Traffic Report), are poor quality documents and quite unpersuasive. The Supporting Report does not convince that Throsby Park is a good or appropriate site for the Centre, nor satisfactorily evaluates the pros and cons of building a centre which requires rezoning of parkland. The Traffic Report does not provide a convincing or plausible estimate of parking demand following opening of the new Centre. A fuller analysis of the shortcomings of the Supporting Report and the Traffic Report can be found at Attachment B and Attachment C at the end of this submission. But at this stage it must be recognised that they contain errors of fact, are tendentious, and are of such low quality that one wonders if they were produced by AI. An assurance that this was not the case would reflect badly on both consultants.
7. We note that the Plans are 1:500 scale despite the fact that scales on the Plans indicate that it is 1:200. The true scale can be determined by using the length of the Griffith shops, which from the northwest side of Gryphons to the southeast side of ShopRite is 103.5m. We are surprised that this issue has not been picked up by either the architect or the project manager within the Government. What else has escaped notice?
8. The GNCA supports the comments made in the ISCCC Submission on this matter, and hopes that this submission will complement and supplement the points made in that document.

RECOMMENDATIONS

9. The GNCA **recommends** that the Government:
 1. **Prepare and release a paper or analysis which realistically assesses the size and incidence of benefits and costs of rezoning of existing parkland, particularly land zoned PRZ1 to permit the construction of the Health Centre, and any proposals to ameliorate or mitigate such loss of parkland;**
 2. **Commission a new organisation to develop a credible estimate of likely parking demand following the opening of the Centre, basing its conclusions on local data, or alternatively ask the authors of the Traffic Report to redo their assessment using more relevant data, and leaving it to the Government to decide how much of this demand for parking spaces it would desirable to make sure is available;**
 3. **Revert to the original position of 2020 that the Centre would be Walk In, and extend its hours so as to be open in the evening and on weekends as with Health Centres elsewhere in Canberra;**
 4. **Give serious consideration to alternative sites for the Health Centre, but also consider disaggregating the Centre, with the Dental Unit, for example, being located at one local or group centre, while other services are distributed over other shopfronts elsewhere in the inner south;**
 5. **Release and place on the Have Your Say website all the documentation the Government holds about the proposed Inner South Health Centre, including the Site Report justifying the selection of Throsby Park as the site for the Health Centre, the Tree Survey Report and associated Indicative Demolition and Tree Removal/Protection Plan, and any schedule of trees and their condition etc, the Geotechnical Survey prepared by Fortify, and any other documents relevant to the proposal;**
 6. **Release any Business Case or analysis demonstrating that it is convenient and desirable for the diverse and unrelated health services to be provided by the Centre to all be co-located in the same building;**

10. While the GNCA is grateful that the Minister for Health has been willing to meet with us, we have found that the flow of information from the Government has not matched the Minister's willingness to communicate. There are a number of examples where information held by the bureaucracy has not been made available, for no discernible reason. An example is the Site Options Analysis which was mentioned during our meeting with the Minister on 5 September, but was not released with other relevant documents at the commencement of the consultation period for DPA-06.

11. We understand that this document has now been released to a constituent attached to the Minister's reply to a representation, but it has not yet to our knowledge been publicly released. We call for this document, and those identified in the Recommendation above, to be placed on the Have Your Say Website beside the current DPA-06 supporting documents,

and the period of consultation extended for a suitable period to allow interested citizens to read and digest these and if necessary, amend any comments they might wish to make.

SUMMARY OF THE ISSUES

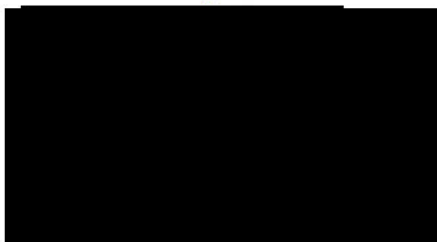
12. The GNCA is aware that this submission is considerably longer than would be desirable, but feels that this is an unfortunate consequence of the low quality of the proposal put forward and the inadequacy of the supporting documentation released by the Government. Readers who are short of time may take the arguments on trust and skip Attachments A, B, and C.
13. DPA-06 proposes to amend the Territory Plan by rezoning various portions of existing public parkland to CFZ. No serious justification for this loss of parkland is offered except that it would facilitate the construction of the Health Centre. Some errors in the Supporting Report are identified. The GNCA is not convinced that the benefits offered by the proposed Health Centre outweigh the loss of parkland. There needs to be a more powerful argument than that the Government would find this rezoning convenient.
14. The impact on the Griffith shops is a critical measure of the benefits and disbenefits of the proposal. A failure to provide enough parking for both patrons of the shops and patients at the centre will lead to a loss of patronage and diversion of business to nearby Manuka and Kingston. Unfortunately, the Traffic Report, which is supposed to demonstrate the adequacy of the proposed parking, is entirely unconvincing. The best that one can say is that the parking may be adequate. On the other hand, it is entirely possible that the parking may not be. In addition, there will be a considerable period when work of moving the children's playground, constructing the stormwater retardation basin in Throsby Park, and then building the Health Centre, will disrupt parking at Griffith Shops. Again, one can hope that this will be well planned to minimise any disruption, but the quality of documentation so far does not encourage optimism. The GNCA is not yet convinced that parking will be adequate.
15. The proposed centre will be large, with a footprint of about 1,500m² and over two thirds the length of the Griffith shops. It will not be, like that at Weston Creek, a walk-in centre open for extended hours 7 days a week. The services will focus on the provision of dental services, accompanied by various seemingly unrelated health services and some nursing. The public is likely to be disappointed that what is proposed is not what they expected. It is not clear what advantages accrue from co-locating these other health services with a large dental clinic. It may be worthwhile locating these services separately in individual shop fronts. Possibly the Government could offer these services by way of vouchers to existing private practitioners. The GNCA believes that the services proposed to be offered do not reflect the public's clear preferences and the Health Centre should be redesigned as a nurse led walk in health centre with extended opening hours such as at Weston Creek.
16. Why the 'Inner South' Health Centre should be located in Throsby Park behind the Griffith shops is not clear. The Government has a Site Options analysis but has not released

this on DPA-06 website. A seemingly more suitable site in Manuka appears to not have been seriously considered. Other sites with at least the same level of public transport access, such as on Cunningham St in Eastlake (in the former rail yards) do not appear to have been evaluated. Other health centres are located at Group or Town Centre to take advantage of better transport links and parking, and a greater probability that access and mobility issues will be properly addressed. Despite the optimistic assessments in the Supporting Report, behind the Griffith shops is not an outstanding location when considered against these criteria, and why the Government appears to be set on this site is not clear. The Supporting Report vaguely suggests that dental issues are more common in ‘the south of Canberra’ but does not make the data behind this public, nor explain why the Throsby Park site is the best in ‘the south of Canberra’. The GNCA remains unconvinced that Throsby Park is the best site for the Health Centre.

17. The Supporting Report indicates that some trees will have to be removed for the construction of the Centre but says that these will be replaced by a greater number of superior trees. In the absence of any Arborists’ report and Tree evaluation the GNCA cannot be certain that these claims are valid.
18. When jointly announcing DPA-06 with Health Minister Stephen Smith Minister Steel asked for views on whether the Health Centre project should be made a Territory Priority Project (TPP). This status would mean that Third Parties could not lodge planning appeals against the proposal. The GNCA has long felt that this approach is misdirected, and that the best way to speedily secure approval, and construction of Government projects is to make sure that the planners, architects, engineers and others associated with the project are the best available. More money should be spent on getting the project right in the first place rather than in employing lawyers to defend substandard, non-compliant bad designs. The GNCA still holds this view and is opposed to the extension of TPP status to the Inner south Health Centre project.

The issues are discussed in greater detail in Attachment A. The GNCA thanks you for the opportunity to comment.

Yours faithfully

A large black rectangular redaction box covering the signature and name of the President of GNCA.

President, GNCA

10 December 2025

DISCUSSION OF THE ISSUES

Loss of parkland

19. A problem with the Throsby Park site which the Supporting Report fails to address in any detail is that it involves the rezoning to CFZ of some 2,158m² of PRZ1 land which nominally forms part of Throsby Park (at this stage we should note that the Supporting Report appears to believe that it is some 4,647m² of PRZ1 zoned land that is to be rezoned, but how this number was derived is not apparent). This is only slightly less than one third of the entire site.

20. The two areas in question, part of Block 33 and the whole of Block 39, were gazetted as PRZ1 in 2008 as part of the implementation of the Open Space Network Project. Details are in Variation to the Territory Plan No.165 Open Space Network of May 2006. As this document says, zoning as Urban Open Space “indicates that the area has been set aside for long-term open space use and is generally characterised by unrestricted public access. As such, these spaces have a high level of statutory protection.”

21. One could argue that some 1,385m² of the area to be rezoned is Block 39, which though zoned PRZ1 has never permitted public access, and remains fenced off to this day. But this would be to reward the somewhat doubtful, if not improper, actions of City Services in not removing this fence in 2008, which scarcely sets a good precedent for the future. The remaining 773m² forms the corner of the old tennis courts on Block 33, and has indubitably been part of Throsby Park since 2008.

22. At nowhere in the Supporting Report is there an explanation of why it is desirable to expropriate either this portion of Block 33 or the entirety of Block 39 apart from repeated statements to the effect that this would allow the building of the Centre. What other parks in Canberra might we find suddenly expropriated for worthy Government ends if expediency were the only test?

23. In assessing the positive and negative impacts of rezoning PRZ1 parkland the Supporting Report states at p.34 that “*The change to the PRZ1 portion of the site is not seen to adversely impact the surrounding open spaces ability to achieve the above policy outcomes*” This is in relation to the rezoning of an area (on the Report’s figures) of 4,647m² of PRZ1 zoned land in Throsby Park, which at present has an area¹ of 6,680m², or about 70% of Throsby Park. While we believe that the report is confused about the areas involved (see Attachment B) this

¹ Derived by summing the areas of Blocks 34 and 40 (freely available on Actmapi, and the PRZ1 portion of Block 33, available from the gazettal notice. Why the authors of the Supporting Report appear incapable of doing the same should perhaps be raised with them by the Government.

conclusion appears unreasonable. Surely the reasonable person would concede that reducing a park to 30% of its former area might possibly ipso facto be seen as an adverse impact?

24. At p.39 The Supporting Report says “*The loss of PRZ1 and PRZ2 land as part of the proposal is noted as a perceived impact, however it is noted that the land itself is not broadly used for the uses perceived for these zonings, rather the site is currently dedicated to parking and low-level landscaping.*” This is a disturbingly subjective assessment, but if the reference to “uses perceived for these zonings” is a comment on the public’s inability to use Block39 as parkland despite its zoning is surely not an argument for its rezoning to CFZ.
25. At p.41 the Report states “The proposal seeks to rezone blocks 33 and 39 Section 78 Griffith to CFZ – Community Facilities Zone”. This appears to enthusiastically expand the actual rezoning proposed in DPA-06, which restricts this to the PRZ1 portion of Block 33, and leads one to wonder how clearly the authors of the Report understand the proposed amendment. We also note in passing that the total area of Blocks 33 and 39 is 4,560m², not the 4,647m² the Report uses.
26. Further down the same page the Report states “*The proposed rezoning will benefit the local community through the provision of a new Inner South Health Centre which will provide a broad range of health services to the Inner South*“ and “*The potential adverse impacts of the change have been appropriately mitigated through the 30% PSP and functional design brief. As a result, the proposal represents a significant net benefit to the community in achievement of a key Government initiative*”. The first statement is not balanced by any assessment of possible disbenefits, and the latter statement has a decidedly authoritarian tone with its reliance on impenetrable (and possibly meaningless) jargon (the term ‘30% PSP’ is not defined in the Report), and the suggestion that the Community has received a benefit because the Government has achieved one of its key objectives. More AI at work?
27. We would be reassured if the Government could produce a balanced and reasonable paper explaining these actions and putting forward measures which might ameliorate or remediate the loss of this public access land. One possibility might be to preserve the existing open space on the CFZ portion of Block 34 and move the parking proposed to be located there to the upper portion of Throsby Lane beyond the round-about, which currently provides access to Block 39. This would involve expanding the site to take in some space used for roads, but this should not present a difficulty.

Parking and its Impact on Griffith shops

28. The Centre is to be built on land currently used for parking for the Griffith shops. It is expected to open in 2028 after construction in 2027, following the construction of the Storm Water Retardation Basin in Throsby Park in the second half of 2026. Construction of both the Retardation Basin and the Health Centre will involve disruption, loss of parking, and diversion of trade from shops.

29. On the other hand, it is possible that the influx of construction workers and tradies will to some extent offset the loss of trade due to reduction in the amount of available parking.
30. The plans show that that any existing parking spaces lost by the construction of the Health Centre will be replaced, with additional spaces being provided. But will the additional parking spaces be enough? The risk here is that if there is inadequate provision of parking for the Health Centre then the shops will lose trade as potential shoppers go elsewhere (Manuka and Kingston are both very close). The best case outcome is that the Health Centre draws new business to shops, without displacing any existing custom. This is possible if parking is adequate.
31. The Traffic Report claims adequate parking will be available at the opening of the Health Centre, but the quality of this analysis leaves much to be desired. The GNCA is very concerned that construction of the Health Centre does not negatively impact on the shops. We accept that the Government will try and minimise any disruption, but must concede that Civic's experience with Stage 2A of the tram, and the redevelopment of the Red Hill flats site, does not give reason for optimism.

Form and Function of the Centre

32. It is regrettable that we know considerably more about the Centre, its design, and the services it is expected to offer from information in the supporting documents provided to justify DPA-06 than we do from any information provided directly by the Government. A week after the GNCA's meeting with the Minister on 5 September we received a plan of the site with the interior blanked out, and no indication whether the Centre was to be one or two-storied. Fortunately, plans of the Ground and First Floors of the Centre were included at Appendix E of the Traffic Report, a document released in support of DPA-06. The plans were drafted in December 2024 and revised in January 2025 so why they were withheld until October 2025 is not clear. This lack of trust in the public can only engender suspicion that the Centre is perhaps not everything that the public might otherwise expect.
33. The Centre will be a large building with a footprint of about 1,500m², and about 70m long (about the distance from the Gryphon to Recess Coffee), at a diagonal to the line of the shops and local street grid. Above the ground floor there will be a small first floor with additional staff car parking and staff amenities, (showers, staff room, etc). There will be about 50 staff and 28 "points of care". There will be 78 rooms, with 71 of these on the Ground Floor. Currently there are 59 car parking spaces on the site of the Centre; these will be replaced with 87 public spaces and 32 spaces reserved for staff. So total parking will be increased by 60 spaces, but parking available to the public increased by only 28 spaces. Some of this additional parking is to be located in a portion of Block 34 not currently used for parking with a number of trees on it. If possible, it would be desirable to retain this existing open space and relocate the parking to alternative areas.

34. While there may be persuasive reasons why a building co-locating a number of unrelated services is preferable this has not been demonstrated. Similarly it may be that Throsby Park behind the Griffith shops is the most accessible and most central site for the inner south, but if so the case has not been well argued.
35. Services to be offered from the Centre are listed on p.3 of the Supporting Report. These services include:
- ACT Pathology collection services
 - Post-acute Care and Chronic Disease Management
 - Nursing
 - Podiatry
 - Nutrition
 - Physiotherapy
 - Rapid access clinics
 - 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.
36. This makes it clear that the Centre will not be a walk-in nurse led Centre, such as is at Weston Creek, open 78 days a week from 7.30 am to 10 pm. Visits will be by appointment only, during weekday office hours. The availability of medical services, as distinct from health services, will be limited. Many members of the public expecting something similar to the Weston Creek Centre will be disappointed by what is offered,
37. We note the emphasis on dental services. These will not be available to all ACT residents, but only those with appropriate Government cards. As it seems probable that these will be in lower income brackets it is worth putting some effort into ensuring that they have the easiest access to any dental facilities. It seems unlikely that the Griffith shops, with their limited public transport, would meet such an ease of access test. Narrabundah (on the last figures we have seen) has twice the level of public housing than does Griffith. If we take public housing as a reasonable proxy for access to Government funded dental services, then if the provision of dental services is the principal determinant, then it appears that the Health Centre, or that portion providing dental services, should be located at Narrabundah shops.
38. The remaining services to be offered at the Centre cover a wide range. We note that many of these are offered by independent private practitioners. From the lay-person's point of view there seems to be no requirement that health services such as Pathology collection, Podiatry, Nutrition, Physiotherapy, group exercise and education programs to be located in specialist

accommodation. This seems to suggest that there are little gains to be had by co-locating all these in one building, particularly if the building is principally dedicated to the provision of dental services.

39. With the cost of the proposed Centre apparently put at \$22m, we trust that the Government has fully explored all possibilities to reduce the costs of service provision, including disaggregation of services and the use of existing commercial facilities where available. While it is possible that there are advantages in co-locating such different services, we are not aware of any evidence of this, and the onus rests with the Government to demonstrate that this is the case. Arguments on the lines of “We have always done it this way” should not carry much weight.
40. In the GNCA’s meeting with the Minister we were advised that the services to be offered were not yet finalised. For example, it was not yet determined whether X-ray and CT facilities would be included. We are not certain what is meant by “BreastScreen ACT” but presume that an X-ray facility will be available for screening unless this item merely covers the provision of office space.

Proposed location

41. The proposed location of the Centre in Throsby Park is not obviously the best location for a Health Centre intended to serve the entire inner south. Geographically the centre of these suburbs lies somewhere near Manuka, while we suspect that the population centre might lie closer to the Kingston group Centre or near Kingston Foreshore. Not only are Griffith shops/Throsby Park not central to the inner south, they are also not central to Canberra south of the lake, in relation to which the inner south sticks out like a peninsula to the east. Neither, despite the waffle in the Supporting Report, are Griffith shops/Throsby Park particularly well served with public transport, as only one bus service runs along Stuart St. We note that most, if not all, other Health Centres in Canberra are located in Group or Town Centres, presumably reflecting the centrality of such centres to the areas they serve, greater availability of patient car parking, and greater choice in public transport access.
42. This raises the possibility that there may well be more desirable sites for the Inner South Health Centre, better served by public transport, and closer to the centre of population. Assuming that the Government decides that co-location of all the proposed services is desirable, the obvious places to examine are at Manuka, and other possible sites at Kingston Foreshore (possibly in the as yet undeveloped Arts Precinct) and Eastlake (east of Cunningham St in the former rail yards).

43. If the Health Centre is to be located in Throsby Park a considerable amount of work will need to be done to make the Centre accessible from both bus stops on Stuart St, both to and from Manuka. This is particularly so if it is intended that the Centre be accessible to those with restricted mobility. A proper level crossing will need to be established to let passengers cross from the bus stop on the west side to the east side of Stuart St.
44. While it is not possible to be precise in the absence of a survey map, it looks like Stuart St is about 3m or perhaps a little more above the Barker St pavement outside the Griffith shops, and from there it is a further 2.5m or more down to the floor level of the Centre at 578.700. Proper accessible pathways from Stuart St down to the shops, and then from the shops down to the Centre, dropping only at the permitted gradient compliant with the Access and Mobility Code, would have to be installed and maintained. In light of this it might be easier and cheaper to raise the main floor of the centre to the same level as the Barker St pavement, with an elevated walkway from the shops to the Centre. This would have another advantage in that the space underneath the Centre could be used as car parking, reducing the loss of parkland.

Trees

45. There are a number of trees on the site. It seems that some loss of trees is inevitable, and this is acknowledged in the Supporting Report. For example, the Report states at p.22 “The PRZ1 portion of land contains several high and exceptional value trees which have been identified to be retained as part of the proposal“ and at p.23 “The demolition plan shows several trees to be removed, which are intended to be replaced with additional plantings “, “The proposal is designed to minimise the loss of green space, and to augment any loss of trees with significant trees planted exceeding those impacted by the proposal”. and “Figure 2 of this document (*Griffith Health Centre Indicative Site Plan*, prepared by May & Russell) demonstrates a high-level of plantings around the proposed facility which will exceed the number of trees to be removed.”
46. It appears from this that an Arborist’s report and tree survey has been prepared. The Supporting Report says at p.7 “A separate tree survey report is being prepared by SPACELAB”, and the low-resolution Indicative Demolition and Tree Removal/Protection Plan at p.23 of the Report indicates that this had been prepared at the time of release of the Report. However, the Government has chosen not to release this/these document(s).
47. In the absence of the Arborist’ Report we can only make a guesstimate about the trees to be removed on Blocks 33 and 34 on the basis of the Arborists Report for the Storm Water Retardation Basin in Throsby Park, but this gives no knowledge of the trees on Block 39. Our best estimate is the removal of between 20 and 30 trees.

48. It will remain difficult for the public to assess to what extent the Government's intention to replace removed trees can be achieved until the release of the Tree Survey Report and a good quality version of the Tree Removal/Protection Plan. The public cannot accept assurances that the number of removed trees will be exceeded by replacement trees in the absence of the relevant documents, especially in light of the Supporting Report's tendency to indulge in what can best be described as flights of imagination. The GNCA will remain sceptical about the adequacy of any replanting until the relevant document(s) have been released.

Territory Priority Projects issue.

49. In the Joint Media release of 7 October 2025 announcing DPA-06 the Minister for Planning Chris Steel indicated that the Government was considering declaring the Health Centre a Territory Priority Project. This would prevent any third party appeals in relation to defects in the planning. This would be possible if a proposed amendment to the Planning Act 2023, which proposes extending appeal exempt Territory Priority Progress status to projects undertaken by the Health and ACT housing Directorates.

50. The GNCA lodged a submission to the Legislative Assembly inquiry into this proposal explaining why the idea had no merit. The GNCA remains of this view. If the Government believes that a project may be held up by third party appeals the solution is to appoint better qualified staff who can supervise designing a project that is compliant with current planning rules.

51. Any supporter of proposals to extend the scope of Territory Priority Project exemptions should also be aware that this does not preclude challenges, it merely moves them from the ACAT to the ACT Courts, which would make the process much more cumbersome and slow. This would have the effect of excluding any but the richest individual from challenging a planning decision, while leaving developers with full scope to litigate against a rival's projects, which we understand is the source of at least some ACAT appeals.

52. The suggestion that citizens should be deprived of their originally common law based right to object when the Government has made a mistake is appalling and should be opposed by all those who believe in democracy. The GNCA remains firmly opposed to the use of the TPP power on any project other than the light rail, and in particular is opposed to any suggestion that DPA-06 and any work associated with the proposed Inner South Health Centre be declared a Territory Priority Project.

Supporting Report

53. The establishment of an Inner South Health Centre is a serious proposal, and the tax paying public has a right to expect that the pros and cons will be examined in a professional, honest, and unbiased fashion. Unfortunately, this does not appear to be the case.
54. The Supporting Report was prepared by SpaceLab Urban Planning and Design and is dated 30 June 2025. The Report “is intended as supporting documentation providing key reasons and considerations for the rezoning” and “addresses potential positive and negative impacts of the proposal including provision of community infrastructure, equitable and accessible provision of healthcare, local amenity, open space, traffic and parking” (p.1).
55. It appears that the Consultants are not familiar with the site, and at times seem to have come no closer than a Google Maps or ACTmapi aerial view. For example, at p.22 The Report says “The PRZ2 portion of the rezoning is taken up primarily by a surface car park, toilet block and several small, low- quality trees over a manicured grass setting.” Those more familiar with the area will know that the “toilet block” is an about 4m by 3m corrugated iron structure with a large roller door as the only entrance, and holds large rubbish or recycling containers. From the ground it would be impossible for any sane human to confuse it with a toilet block. While this is possibly a minor error it makes one wonder what else about the site have the Consultants misinterpreted or misunderstood?
56. The Report appears confused about the various portions of the blocks to be rezoned, which is unfortunate as this issue is supposed to be what the Report is Supporting. At p.22, and again at p.33 the Report says “*The proposal will result in the rezoning of 2,364m² of PRZ2 – Restricted Access Recreation and 4,647m² of PRZ1 – Urban Open Space*”.
57. These figures are hard to reconcile with data available from ACTmapi and elsewhere, as set out in ‘Table 1: Health Centre site blocks zonings and areas’ below. They are also puzzling because at p.6 the Supporting Report appears to get the numbers correct.

Table 1: Health Centre site blocks zonings and areas

Block	Name	Zoning			Total
		CFZ (m2)	PRZ2 (m2)	PRZ1 (m2)	Area (m2)
Block 33	Griffith Tennis Courts		2,402	773	3,175
Block 34	Throsby Preschool	2,329		2,286	4,615
Block 39	Works Depot			1,385	1,385
	Health Centre Site	2,329	2,402	2,158	6,889
	Total area of three blocks				9,175

59. The PRZ1 area of Block 33 is specified as 773m² at p.19 of “Variation to the Territory Plan No.165 Open Space Network” of May 2006, and Gazetted on 31 March 2008. This means the remainder of Block 33, the portion zoned PRZ2, must be 2,402m². This is larger than the 2,364m² mentioned in the Supporting Report and quoted in paragraph 56 above. From Table 1 one can see that the area of the proposed Health Centre site that needs to be rezoned from PRZ1 to CZF is 773m² (of Block 33) + 1,385m² (Block 39) = 2,158m², less than half the 4,647m² stated in the Supporting Report.
60. Much of the commentary in the Supporting Report seems to be relentlessly positive, determined to find a pearl amongst the muck.
61. For example, at p.25 it says that “The redevelopment of a largely unused area to provide a much needed community facility while improving the level of tree planting to the immediate area is seen as a net positive for the locality.” Of course, that depends on who is doing the seeing. A considerable portion of the site is currently used as parking for the local shops, and can scarcely be described as “largely unused”. The remainder is the currently fenced off Block 39, or part of Throsby Park, an area that has been neglected by the Government, so the children’s playground equipment and related facilities are not at the standard of some more fortunate areas, but the park is used by locals as much as any typical park in Canberra. The failure of the Government to remove the fences around Block 39 are not an argument for its rezoning to CFZ. If we accept this interpretation of ‘unused’ most of the parks in Canberra could be turned into the sites of Government buildings, and then be assessed as having improved local amenity. The proposed health centre is not “a much needed community facility”. There has been no local demand for a centre with the restricted services now proposed. Many might feel that the Centre is being wished upon us by the Territory Government which has decided to locate this facility here for reasons which have not been made clear.
62. Again, at p.30 the Supporting Report proclaims “The high-level of public transport and active travel routes to the site, enhance its accessibility without increasing car dependency”. Back in the real world we note that there is only one bus service which travels along Stuart St. Labelling this a “high-level of public transport” seems to be setting the bar a little too low. The only areas that would not fall into such a high level of public transport would be those with no bus service, like Oaks Estate. To most of us there is a difference between high access and some access.
63. This farrago of gushing enthusiasm for siting of the Health Centre at Griffith shops, and the occasional random failure in relation to facts, which seems to have slipped by the authors unnoticed, might lead some to ponder if this report is the product of AI, something which is now not unheard of. Whatever the basis of this, it leaves a lingering concern that anything, no matter how adverse, would be present as another powerful argument that the Centre should be in Throsby Park. This robs the Report of its persuasive power. It is certainly not an objective evaluation of the pros and cons of the possible locations for the Health Centre.

Traffic Report

64. The Traffic Impact Assessment Report, finalised in January 2025, has other problems. Much of it is related to the rather obvious conclusion that the Centre should not generate so much new traffic that use of the local streets are likely to be significantly affected. Only pages 23 to 26 are devoted to determining whether there will be adequate parking for the shops at Griffith when the Health Centre commences operations. Unfortunately, the Traffic Report is hard to follow, and doesn't always explain its methodology or the meaning of terms it uses. Rather than looking at current parking patterns, and then trying to predict how much extra parking demand the Health Centre might generate, it relies on 2015 data collected in NSW at 20 "Health Centres" in NSW. No effort is made to convince the reader that these Health Centres are in any way comparable to the proposed Inner South Health Centre. Neither do the authors attempt to adjust for changes in motor vehicle ownership and propensity to use public transport between NSW (dominated by Sydney) and the ACT, both in 2015, and at present, in 2025. Maybe the authors just don't care.
65. Having imported the basis of the projected parking demand the authors then go to some length to explain why the Government doesn't actually have to plan to handle this number, because those who can't find parking spaces can just park in the neighbouring streets. We believe that it would be more desirable for the Government to try to make sure that all those seeking to park at Griffith shops after the Centre is operating are catered for, so that the Griffith shops do not suffer from the arrival of the Health Centre.
66. The GNCA's view is that the parking demand calculated in the Traffic Report is unconvincing, and believe the Government would be wise to seek an alternative assessment from a different source, ideally using data from the ACT.
67. The Traffic Report shares a difficulty with the Supporting Report in that it seems confused over the area of the Health Centre site. At p.8, and again at p.31 the traffic Report says "The subject site has an area of 7,027 sqm." It is hard to reconcile this number with the area of 6,889m² as derived in the table in Attachment B above. Are both reports drawing numbers from some flawed source document the Government hasn't yet released, or is this another example of AI in the workplace?

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

Dear Planners

Proposed GRIFFITH HEALTH CENTRE for the Inner South

Thank you for the opportunity to comment. I have taken the opportunity to not only comment on Zoning.

As the content below demonstrates, the proposed health centre for the inner south must NOT be built behind the Griffith shops in the ACT Government's preferred location.

The current ACT Government invests a substantial amount of taxpayer revenue into maintaining and developing Canberra's health services. This is necessary given that over 25% of consumers using ACT health services are based in NSW and the ACT Treasury's ambitious projections of population growth across Canberra.

As a long-term resident of Canberra, the raising level of debt for all Canberrans is very concerning and investment in a health centre located in Griffith is both disappointing and flawed. There is little wonder the ACT's expenditure and credit rating (AA by S&P Global Ratings in September 2025) continues to spiral downwards. Further examples of poorly considered capital expenditure include the new Canberra Stadium, Light Rail, Convention Centre and Canberra Theatre. These projects do not fall into critical infrastructure expenditure like health. Any expenditure needs to be founded on evidence-based criteria, thorough due diligence, rigorous consultation and meet taxpayer expectations with the funds invested. The proposed inner south health centre in Griffith meets none of these.

Why select the suburb of Griffith for the inner south health centre?

Health centres across Canberra have traditionally been located at major town centres or central hubs for good reason, including:

- to facilitate effective public transport (single trip by bus) and destination on a regular timetable (there is no dedicated "rapid bus" connection to and from the Griffith shops, unlike a town centre)
- the provision of existing parking infrastructure
- existing disability access to, and throughout these major hubs
- access to ancillary health and medical services such as professionals located at a town centre, including large pharmacies.

The suburb of Griffith has a deteriorating infrastructure and does not meet any of the above criteria.

Feedback on the location of a health centre based in Griffith

As a resident of Griffith, I attended many of the consultation sessions and contributed to the Your Say survey. From what I have personally heard and read; there appears to be very little regard to, or consideration of, the following:

- Many respondents were somewhat positive about an inner south health centre located elsewhere.
- The majority of feedback about the health centre being located in Griffith was negative.
- Many suggested alternative locations such as Manuka, Kingston, Kingston Foreshore, the new Eastlake precinct using existing community facility blocks, or Narrabundah becoming a health hub, adjoining the existing Winnunga Nimmityjah Aboriginal Health Service.
- A great deal of Griffith/Narrabundah residents objected to the proposed location and the proposed rezoning of highly valued open space, children's playground and parklands to support a health centre.
- Residents, the community and the Griffith Narrabundah Community Association (GNCA) recalled lobbying the ACT Government in 2008 to rezone the area behind the Griffith shops to urban open space.
- Many commented on the loss of very limited green open space, parkland, trees, plants, shrubs and amenity that is highly valued by all inner south residents and business owners.
- The Your Say Report states '*Griffith and Narrabundah residents highly value and enjoy the very limited urban open space remaining and do not require a Health Centre at the proposed location at the cost of losing highly valued playground and parklands.*'
- Many residents consider it very undesirable to build a two-storey health centre at the rear of the Griffith shopping village and believe this will alter the fabric, character and atmosphere of the Griffith shops. Additionally, many find it disappointing that this has not been taken into consideration.
- Traffic and parking arrangements for the proposed health centre have not been taken seriously with the Traffic Impact Assessment Report dated 24 January 2025. The report used data that was over 10 years old!
- Failure to suitably and accurately address traffic and parking will indeed have a very negative impact on the Griffith shops and residents of Griffith and Narrabundah.
- Residents living near the proposed health centre may have their already narrow residential streets turned into overflow parking lots.
- Current bus transport to the Griffith shops is very restrictive and nowhere near optimal compared to services provided for Manuka and Kingston.
- Pedestrian access from the bus stop along Stuart Street to the proposed health centre is over 300 metres and extremely hazardous with many steps.

- A great deal of planning, design and expense would be required to facilitate the accessible pedestrian traffic from the Stuart Street bus stop, through the Lafoy-Halal Park, parking area, shopping centre and lane way to the proposed health centre.
- The impact of such earthwork, construction, building and trades parking on Throsby and Blaxland Parks require much planning, consideration and consultation.
- Patrons from across Canberra and nearby NSW support the Griffith shops due to the range of organic produce and therapeutic offerings by many of the businesses. Insufficient parking, both short and long term, will jeopardise the longevity of these specialised shops and providers.

Community Consultation?

At no stage has consultation on the location of the proposed health centre in Griffith been transparent or evidence-based.

My approaches to the Health Minister, the Health Minister's staff and the Health Minister's Directorate have generally been ignored. Having requested full disclosure on 27 July 2025 with regard to reports, studies and plans, it has taken until 17 November 2025 for the Minister's Office to respond and provide these documents. As such, this now allows only two business days to analyse and provide comment prior to the close of the consultation period on 19 November 2025.

- When seeking public and community comment, it is helpful if ALL relevant documentation is made available in a timely manner to engender informed decision-making, and not be withheld, as is the case with the documentation for the proposed health centre in Griffith.
- Further, why was there no:
 - site option analysis provided for the consultation period (report issued in March 2024 by May + Russell) – with options such as operating in a repurposed, existing community facility location in Manuka or Kingston, where a health centre would be more accessible
 - arborist report – not made available despite reference to this document
 - relevant Traffic Impact Assessment, given the dated information and methodology
 - geotechnical survey prepared by Fortify
 - attempt to save/retain urban open space, parkland, trees through basement and/or rooftop parking, despite this issue being clearly identified in the pop-up consultations and Your Say Report – this is extremely disappointing and demonstrates the Government's disconnect with the community.

What happened to the “Walk-in Health Centre” model?

Throughout the entire consultation process, the inner south community was led to expect a “Walk-in Health Centre” with GPs and nursing staff. Was this to generate local support for the proposal and increase demand for a health centre service?

On nearly ALL occasions, the health centre was likened to the services provided at the existing Weston Creek Health Centre, including similar services and hours of operation.

In the case of a health centre in Griffith, this is NOT what is now on offer. This is not what was highlighted at the pop-up stands and the Your Say survey. The engagement and consultation is nothing short of a farce, to be located in a suburb with little viable access for those most needing a health centre.

This change of proposed use for the health centre calls into question both the required capital expenditure for such a project, and the social cost of the proposal, in terms of lost parkland, the likely destruction of mature trees, shrubs and plants, and the loss of amenity and village atmosphere that ALL residents value.

Territory Priority Project

The Minister for Planning and Sustainable Development, Chris Steel, recently stated that *Infrastructure Canberra* has proposed the Inner South Health Centre be declared as a *Territory Priority Project (TPP)*. As such, this would exempt the project from third party appeals.

This strategy, to bypass the normal development approval process, is what many would consider unconstitutional, and in my view, a complete breach of Ministerial powers.

- Does the ACT Government really believe that Canberrans are willing to allow the Minister for Planning and Sustainable Development to freely exercise such powers?
- Should the Minister believe that the use of such powers is warranted, the ACT Government is sadly out-of-touch with Canberrans, community values and adherence to all forms of natural justice.

For any Minister to make a final decision on significant development projects without the Assembly and any recourse or natural justice is simply incomprehensible and very poor form on the part of ACT Government.

Greater emphasis must be focused on significantly improving community consultation, evidence-based decision-making, accountability and the prioritising of capital expenditure, given when the parlous state of the government’s finances.

Key Issues with the proposal

Parking

The adequacy of parking provision in the proposal is extremely disappointing, given that many people at the pop-up sessions strongly supported and advocated **basement car**

parking to minimise the acquisition of valued parklands and open space. This would have supported the local shops as well.

Should the proposed health centre proceed in Griffith, your documents indicate that construction is likely to start in 2027, opening some time in 2028. Access to parking will be significantly reduced throughout this period, due to space required by construction equipment, stored materials and workers' vehicles. Like the Red Hill shops, Griffith shop owners will lose customers who cannot conveniently park and access their local shops.

Public transport

Serious doubt remains as to the proposed location, which is not easily accessible by public transport in the inner south.

Building size

The proposed health centre now appears to be a massive, two-storey building dominating the landscape of approx. 1,500m² and about 70m long, with many more staff and car parking (not basement) than originally stated and alluded to at the pop-up sessions.

With such height and scale, the footprint has an enormous and much greater impact on the parkland, open space and amenity than residents ever envisaged. The community has simply been misinformed and misled.

Security

There is no mention of any CCTV cameras and surveillance for the proposed health centre, or the Griffith shops which have experienced numerous break-ins, robberies and more recently, assault. There is also no mention of increased Police or security patrols for the proposed health centre or the Griffith shops. The proposed health centre will attract and place a target on the locality for further increased crime.

Services

I understand that services have not yet been finalised, however, the potential services identified in the proposal have very little resemblance to those services discussed at the pop-up sessions and those mentioned in the Your Say survey. Many of these services are only accessible to Canberrans who possess a concession or Health Care Card.

The proposed services could be provided at less financial and social cost by distributing them around suburban locations, on a similar pattern to private provision. How simple would it be to contract and extend the hours of existing operational private providers to meet the demand?

There is no commitment to basic radiology, ultra-sound or CT scans. This was the feedback at the popups from people who would make use of such services at a health centre.

The proposal as it currently stands, does not have provision for GPs that can make referrals or issue scripts, and no nurses, such as those provided at Walk-in Clinics like at Weston Creek.

In summary, the services offered by such a health centre in the inner south should be accessible to all and valued by the tax-paying public.

Overall, there has not been at any stage, full disclosure or transparent consultation on the proposed health centre.

The ACT public will potentially have a \$22m white elephant.

An alternative site that is accessible, not on valuable open space and provides health services the community needs, such as through a “walk-in” model, must be pursued.

Thank you for the opportunity to comment.

Your sincerely



19 November 2025

From: [REDACTED]
To: [Terrplan](#)
Cc: [LEE](#)
Subject: Objection to Rezoning
Date: Wednesday, 19 November 2025 7:12:31 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.

Re: Objection to Proposed Rezoning – Draft Major Plan Amendment (DPA-06)

To whom it may concern,

I am formally objecting to the proposed rezoning associated with DPA-06.

I also am seeking an extension to the consultation process. I am blind and have not found the documentation to be easily accessible. Even though I am one of the closest neighbors to the proposed site, I have not been notified of this and have recently just found out via a Neighbor.

My concerns relate to three key issues: the loss of valuable green space, inadequate parking provision, and a flawed community consultation process.

- loss of green space

The area identified for rezoning currently serves as an important and well-used green space for local residents. It provides recreational value, contributes to neighbourhood amenity, and supports the wellbeing of nearby families, children, and older residents. Reducing this green space would have a detrimental impact on community liveability and contradicts broader planning principles that emphasise accessible public open space in established suburbs.

- parking and traffic impacts. This will make it more difficult for me to access my local shops due to increased traffic hazards.

The proposed development is likely to generate significantly higher parking demand than the surrounding streets can safely accommodate. Local roads are already under pressure, and increased congestion would negatively affect residents, pedestrians, and cyclists. We have already seen with recent large apartment developments in the surrounding area how this can have an enormous impact on safety and easily navigable thoroughfares for cars going to from homes. Without a clear and realistic parking and traffic management plan, the redevelopment risks creating ongoing access and safety issues for the neighbourhood.

- flawed consultation process

The consultation process to date has been insufficient and inequitable. Many of the residents closest to the site were unaware that consultation was underway, as no signage was installed and no printed information was distributed to affected households. Key groups—including residents of Throsby Court and homes directly adjacent to the site—did not receive adequate notification. This represents a significant process failure and undermines the legitimacy of the current consultation outcomes.

Given these concerns, I request that the rezoning proposal be reconsidered. At a minimum, the consultation period should be extended and a proper, inclusive consultation process undertaken to ensure all affected residents have the opportunity to meaningfully participate.

Thank you for considering this submission. I look forward to a response addressing the issues raised.

Yours sincerely,

[REDACTED]

[REDACTED]

Narrabundah

[REDACTED]

Draft Major Plan Amendment (DPA-06):

Tks,

[REDACTED]

[REDACTED]

Australia | [REDACTED]

From: [REDACTED]
To: [Terrolan](#)
Subject: DPA 06 - Objection to Inner South Health Centre
Date: Wednesday, 19 November 2025 8:30:33 PM
Attachments: [DPA 06 - Objection to Inner South Health Centre - \[REDACTED\].pdf](#)

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.

To whom it may concern,

I wish to register my objection to the proposed Inner South Health Centre. Please see attached reasons.

In summary:

1. Insufficient parking space. ACT construction requirements would necessitate >100 parking spots, which would therefore necessitate a multi-storey parking lot.
2. Impact on traffic in local area. The addition of emergency vehicles and greater traffic throughput in a quiet suburban neighbourhood will put a strain on the local area.
3. Habitat protection. The plan proposes the removal of dozens of trees including gum trees that have been there before Griffith even existed.
4. Lack of procedural fairness. A 'Have Your Say' survey was conducted and numerous responses stated that the location would not work. These responses seem to have been ignored.

Kind regards,

[REDACTED]

[REDACTED]

Email: [REDACTED]
Mobile: [REDACTED]

Objection to DPA-06: Inner South Health Centre – Griffith

We formally object to the proposed Draft Plan Amendment 06 (DPA-06) for the Inner South Health Centre (ISHC) location at the Griffith Shops site. The chosen location is unsuitable and fails to meet strategic objectives. This submission outlines specific objections regarding the location, parking and transport issues, loss of green space, alternative sites, and flawed procedure.

Inappropriate Location

The proposed ISHC location is unsuitable due to deficiencies in parking and transport, as well as incompatibility with the existing infrastructure of the local area. The streets of the Griffith neighbourhood are not designed to accommodate a high flow of traffic, particularly with small children and pets crossing the roads. Such facilities should be located on major roads like Canberra Ave. or Wentworth Ave. to ensure accessibility without burdening residential streets with commuter traffic.

- **Parking Deficiencies:** The plan does not appear to provide sufficient parking for a healthcare facility. The ACT Planning and Land Authority 'Parking and Vehicular Access General Code' stipulates that health facilities require 4 parking spots per health practitioner. With 28 health practitioners, that would require a *minimum* of 112 parking spots and more than 3% of these must be for handicapped persons.
- **Community Opposition:** The 'What We Heard Report' indicated that feedback was dominated by opposition to the specific site, with residents stating it was "not fit for purpose".
- **Traffic Impact:** The proposed access point will push traffic onto local residential streets and schools, unnecessarily impacting residents, students, and commuters accessing the ISHC.

The critical issue of standards-compliant parking and the fundamental unsuitability of this residential location must be resolved before this plan amendment proceeds.

Appropriate Location

The East Lake site in Kingston offers significant advantages:

- **Appropriate Zoning:** It is already designated for community facilities, eliminating the need for contested rezoning and the removal of public green space.
- **Fewer Impacts:** The site is less constrained, minimizing impacts on local character and heritage.
- **Integrated Planning:** Integrating the ISHC into the broader East Lake Place Plan ensures crucial factors like parking provisions and design consistency are considered from the outset.
- **Better Access:** Located on major arterials like Canberra Ave. and Wentworth Ave. and in a commercial area, it limits negative impacts on residential areas such as noise, light, and security concerns.

The ACT Government should thoroughly review the East Lake site as a far better alternative that preserves valued green space in Griffith and mitigates traffic and parking concerns.

Habitat Protection

We oppose the proposed rezoning of Blocks 33 and 39 Section 78 Griffith from Parks and Recreation zones to a Community Facility Zone. This rezoning results in the removal and destruction of valued local green space. Many of these gum trees have been there for decades, well before Griffith was established and they provide critical habitats for the local wildlife.

Lack of Transparency in Government Planning

We believe that there has been a lack of transparency and procedural fairness in the planning of the ISHC.

There is inconsistency regarding parking provisions. Various media releases have indicated that parking will be determined in later planning phases, however the formal plan suggests that 2.23 parking spots per practitioner is sufficient – this does not meet ACT building standards for medical facilities.

The consultation process is fundamentally flawed because it seeks comment on a simple zoning change while embedding specific, detailed development proposals (like a Traffic Impact Assessment, indicative site plans, and proposed practitioner numbers) within the background documentation. This approach misleads the community and renders public comment on critical issues like traffic and parking ineffective and immaterial to the current process.

This lack of procedural integrity is profoundly disappointing, giving the impression that the ACT Government is proceeding with a predetermined outcome while ignoring the legitimate concerns of the community the facility is meant to serve.