



Australian Government
National Capital Authority

Report on Consultation

Concept Plan and Development Control Plan 19/02

Blocks 4 and 5 Section 38 Campbell

October 2019

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1 Introduction

1.1 Purpose and background

This report summarises the issues raised during the public consultation process undertaken by the National Capital Authority (NCA) on the proposed Concept Plan and draft Development Control Plan (DCP) 19/01 for Blocks 4 and 5 Section 38 Campbell.

1.2 National Capital Plan requirements

The National Capital Plan (the Plan) came into effect on 21 January 1990. The subject site is National Land located outside the Designated Areas in the Plan. Section 4.22.2 of the Plan (Special Requirements for National Land) requires that any development, including subdivision and leasing proposals, of all National Land not included in a Designated Area of the Plan, is to conform to a DCP agreed by the NCA.

In May 2016, the NCA approved DCP 16/01 for the site. DCP 16/01 established objectives and planning outcomes for the site. It set out permitted land use, building heights, setbacks, landscape character, access and parking for the site. The DCP also required that prior to development (including subdivision) of the site a concept plan was to be prepared for the site by the lessee and approved by the NCA.

Since approval of DCP 16/01, the site was purchased by Doma Group (Doma) who considered options for development on the site. Doma progressed planning and design for a residential development (apartments and townhouses) and prepared a Concept Plan to guide detailed planning and design.

Revisions to DCP 16/01 were required to facilitate the proposed Concept Plan and a revised DCP (19/01) was prepared

1.3 Development Control Plan requirements

The DCP sets out what plans, reports and strategies are to be included as part of the Concept Plan documentation. This includes:

- Planning and Design Report
- Detailed plan of subdivision
- Built form typologies
- Landscape masterplan, streetscape and public realm design
- Indicative development staging
- Detailed transport assessment and network design
- Servicing strategy plan
- Signage masterplan
- Tree Survey and Management plans
- Geotechnical Investigation Report
- Water Sensitive Urban Design Strategy
- Lighting Strategy

- Heritage assessment and impact statement
- Ecological assessment and EPBC Act requirements
- Environmental Protection and Pollution mitigation
- Bushfire Risk Assessment and Management Plan
- Environmental Management Concept Plan

The DCP requires the Concept Plan to be subject to community consultation and consideration by the NCA.

As part of the planning process, Doma are also seeking to vary some of the provisions of the existing DCP to facilitate the Concept Plan.

2 Public consultation

2.1 Stakeholders

On 29 June 2019, the NCA released the Concept Plan and revised DCP for public consultation. The following stakeholders were identified as having an interest in the future development of the site:

- Department of Finance (DoF)
- Department of the Environment and Energy (DEE)
- Australian War Memorial
- ACT Government Environment, Planning and Sustainable Development Directorate (EPSDD)
- Campbell High School
- North Canberra Community Council
- Campbell Community Association
- Reid Residents' Association
- ACT Conservation Council
- Friends of Grasslands (FoG)
- Mercure Hotel
- Argyle Housing (operators of the nearby Ainslie Village)
- National Trust
- Walter Burley Griffin Society
- nearby Ainslie, Braddon and Reid residents.

All identified stakeholders were advised by letter and/or electronic mail about the release of the Concept Plan and draft DCP for public comment.

1.2 Public consultation activities

In accordance with the NCA's 'Commitment to Community Engagement (August 2015)' the consultation period ran for six weeks, concluding on 9 August 2019. The consultation process included:

- 29 June 2019 – Concept Plan and revised draft DCP 19/02 documentation published on the NCA web site
- 29 June 2019 – a notice was published in *The Canberra Times*.
- 1 and 2 July 2019 – written notices/emails sent to identified key stakeholders and nearby residents
- 1 July 2019 – survey released for public to complete
- 10 July 2019 – public information session was held at the National Capital Exhibition
- 9 August 2019 – public consultation period concluded.

The NCA also utilised social media to advertise the release of the Concept Plan and revised DCP for public consultation and to alert the community to the public information session.

2.3 Survey

A survey was available during the public consultation period and sought community views on the proposed Concept Plan. The survey questions concerned demographic data such as age and suburb of residence, as well as targeted questions about the proposal itself.

Sixty-one people completed the survey. Detailed survey results are at [Attachment A](#).

3 Issues raised during consultation

The community and stakeholders raised a diversity of issues in response to the Concept Plan and revised DCP for Blocks 4 and 5 Section 38 Campbell. The key issues raised during the public consultation period are outlined below, and include issues raised in submissions, at the public information session, and through the survey.

Submissions were received from individuals, community groups, and the ACT Government. Many of the individual submissions and survey responses were from people who reside in Campbell or nearby suburbs such as Ainslie and Reid, although a number of respondents indicated that they lived elsewhere in Canberra.

In addition to those who completed the survey, the NCA received 31 written submissions in response to the proposed Concept Plan and revised DCP (see [Attachment B](#)).

Thirty members of the public attended the information session. A record of the information session is available at [Attachment C](#).

3.1 Design, siting and character

Comments received

The majority of submitters raised concern with the overall scale and character of the proposal, including its impact on views to Mount Ainslie and the War Memorial, diminution of the bush capital character of the area, and the 'gated' nature of the development. Similarly, in response to survey questions concerning what aspects of the proposal respondents least liked, the majority responded that the character and scale of the proposal (in particular the proposed apartment buildings) was not suitable for the site.

There was a broad perception that the proposal will not make a positive contribution to the area and that it is not consistent with the character of residential development in adjoining residential areas. The NCA should be promoting world class design in this location, befitting of the National Capital and of appropriate scale.

Comments received in relation to the impact of the proposal on views to iconic Canberra landmarks suggested that:

- the building form is of a scale that may interfere with the significance and dignity of the Australian War Memorial (the colour scheme of the apartment buildings should at least be consistent with the earthy tones of the vista and war memorial)
- there will be strong visual impact on views to Mount Ainslie due to the excessive scale of the proposal
- view corridors to Mount Ainslie and the War Memorial will be diminished due to the placement of two large apartment buildings with no relationship to the surrounding built form or landscape characteristics
- when viewing the War Memorial from Parliament House, the proposed apartment blocks are likely within the peripheral vision of people and could therefore be a distraction from the experience of the Parliament House Vista

Some concern was evident in comments received that the development will become a 'gated' community due the perimeter fencing, lack of permeability through the site, and road and access arrangements from Limestone Avenue. This may have negative social impacts for those who currently use the site, including school students and residents of Ainslie Village.

Several suggestions were made in regard to how the development could be improved. One idea was to match the setback of new development to the old CSIRO buildings to retain the 'greenbelt' adjacent to Limestone Avenue. Another idea, raised by several submitters, was to reverse the massing of development on site so that higher structures are placed on the higher ground. This arrangement and build of the built form leads the eye naturally to the backdrop of Mount Ainslie, and may result in urban design benefits such as the taller buildings not blocking the outlook of the lower buildings.

One submitter considered that the site attributes appear not to have been utilised well, as the proposal does not appear to recognise site contours. For example, the apartment buildings run contrary to the contours with the long dimension cutting into the hillside. The submitter

proposed an alternative site layout could be better planned in a manner best suited to the natural attributes of the site.

NCA response

The site is approximately 500 metres from the centre of the Australian War Memorial and 200 metres to the Treloar Crescent intersection. The NCA considers that there is sufficient separation between the proposed development and the memorial so as to not significantly detract from the memorial when viewed from vantage points such as Mount Ainslie or on approach to the memorial.

The Director of the Australian War Memorial wrote to the NCA (refer submission no. 31 in Attachment B of this report) confirming that there is no objection to the proposed Development Control Plan or Concept Plan for the site.

Visual analysis was undertaken at both macro and micro scales to demonstrate the impact of development of the site from longer distances such as Parliament House, Red Hill, Black Mountain and Mount Ainslie, as well as more immediate impacts on views to the site from Limestone Avenue, Allambee Streets, the Australian War Memorial surface car park on the northern side of Treloar Crescent, and Euree Street. The analysis demonstrated that the proposed development will not result in significant detrimental impacts on the landscape or significant vistas, particularly when viewed from a distance.

Due to the topography of the site, there is a significant difference in height between the area fronting Limestone Avenue and the rear of the site towards Mount Ainslie. There is some merit in locating the tallest building element on the lowest point of the site to take advantage of screening provided by mature vegetation on Limestone Avenue and reducing visibility of these taller elements from key vantage points.

Geotechnical surveys undertaken for the site show significant 'hard rock' across the site, and site planning is intended to reduce excavation as far as possible. The townhouses in particular will be stepped up the site, utilising the topography and natural site contours. The topography of the site also results in many of the townhouses having a good outlook as they step up the site.

Fencing proposed for the site is a result of the decision made under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act). The capacity to walk and move through the area, for example from Ainslie Village to the city centre, or from Campbell High School to Quick Street will be retained. The NCA has discussed development of the site with representatives from Ainslie Village who do not object to the proposed nature of the development. (Issues regarding the construction phase and operation of the development were discussed, with engagement to be ongoing between the NCA, Ainslie Village and Doma).

Refer also section 3.3 'Building height and scale of development' of this report.

3.2 Land use and planning framework

Comments received

A variety of views and concerns were put forward concerning the use of the site. For example:

- A small number of submitters indicated a preference for the site to be retained for community use. This view was often accompanied by commentary contending that the previous use for the CSIRO headquarters was a more sensitive use of the site, and that a new type of community use could also offer this sensitivity.
- Some people were of the view that if the site is to be used for residential purposes, it should be restricted to townhouse development only (no apartments).
- One submitter suggested that the proposed development represents just another development impacting on the land available for national capital uses, and the broader appropriation of National Land for purposes other than government use.

Some feedback was received regarding the broader planning framework and the proposal's consistency or otherwise with strategic planning initiatives such as the ACT Planning Strategy, the City Renewal Authority's program, and the Territory Plan.

Notably, the site is not within an area identified in the Planning Strategy for 'urban intensification'. The site is also not within an area that might also be considered for higher density development based on neighbourhood characteristics or distance from the city centre. The site is between two low rise residential suburbs and is at some distance from the city centre.

Some submitters noted the intent for the site to become Territory Land in the future, and questioned whether the proposal would be compliant with the intended future RZ5 zoning of the site. These submitters were of the view that for sites that are intended to become Territory Land, the NCA should ensure that a development complies with relevant provisions of the Territory Plan.

Comments received in regard to the Territory Plan included the need to ensure that both the NCA and ACT Government are held accountable to the Territory Plan and its rules and criteria, and that the Concept Plan should not be approved if it is inconsistent with the Territory Plan.

NCA response

DCP 16/01 approved for the site established a number of permitted land uses for the site, including office, residential and ancillary uses such as retail, café and restaurant. Doma Group has elected to develop a wholly residential development, not inconsistent with DCP 16/01. The revised DCP for the site removes office as a permitted use in recognition of this development intention.

The NCA has responsibility for determining detailed planning policy for land within Designated Areas and for National Land outside Designated Areas (of which Blocks 4 and 5 Section 38 Campbell is part). The legislative framework is such that the Territory Plan, administered by the ACT Government's planning authority, must be not inconsistent with the National Capital Plan, administered by the NCA. The NCA is not bound by the Territory Plan.

The NCA also has a responsibility for ensuring that there is suitable land available for 'national capital' uses and is of the view that sufficient land is available for such uses into the future.

The ACT Planning Strategy's 'Policy Plan' outlines the strategic directions for the development of Canberra over the next 30+ years. The Policy Plan recognises that boundaries representing policy directions (such as areas for urban intensification) are not to be regarded as precise.

The NCA considers that development of the site for higher density residential is not inconsistent with key themes and strategic directions of the Planning Strategy, such as the development of a compact and efficient city. This includes supporting sustainable urban growth through the delivery of more housing within the existing urban footprint, and using infrastructure efficiently to support a growing city.

Section 38 Campbell is outside the area over which the ACT Government's City Renewal Authority has responsibility.

3.3 Building height and scale of development

Comments received

Many people throughout the consultation process emphasized that they do not object to development of the site, but have strong concerns about aspects of the proposal. The majority of people, in both submissions and survey responses, cited the height of the proposed apartment buildings and scale of the development generally as being their key issue of concern.

At eight storeys, the proposed apartment buildings were identified as being the tallest structures anywhere along Limestone Avenue. Many people considered that the proposed buildings would be out of place, and that new development should be more considerate of the scale and density of adjoining and nearby development. The perception of excessive scale is exacerbated by the topography of the site, with any building constructed on site sitting above the adjacent kerb height.

A number of suggestions were received to either reduce the number of storeys of the apartment buildings, or remove the apartment buildings altogether and construct townhouses only on the site.

Several submitters were of the view that the proposed arrangement of building height on the site should be reversed. This would result in taller apartment buildings (perhaps up to six storeys high) being located at the crown of the site, and the townhouses located on the lower slopes of the site closer to Limestone Avenue. This would be more sympathetic to the Limestone Avenue frontage and the nearby heritage residential area in Reid, and would also provide a better outlook for the townhouses.

Several submitters noted that urban development commonly follows a pattern whereby the height, volume, density and scale of development decreases with increasing distance from the site centre. The proposed development does not follow this reasonable and logical approach.

Several submitters also noted that the site is intended to become Territory Land at some stage in the development process, and an RZ5 (high density residential) zoning will be applied to the site. An RZ5 zoning under the Territory Plan permits a maximum building height of 21.5 metres.

Some submitters expressed uncertainty as to whether the proposed apartment buildings would be within this height limit, however advocated that the maximum height limit for the RZ5 zone should be applied to the site.

Building height matters also relevant to design, siting and character matters discussed in section 3.1 of this report.

NCA response

Development Control Plan (DCP) 16/01 was approved by the NCA in February 2016. DCP 16/01 allowed for buildings across the site to be constructed to RL617. Associated policies were concerned with the character, quality, and design of buildings. The developer purchased the site with this framework in place. The developer has proposed two building of approximately 25 metres high, which will be lower than the permitted height and that of the former CSIRO headquarters.

Any amendment to the Territory Plan will have to be consistent with the DCP. The DCP recognises that the scale of the apartment buildings will be similar (but not identical) to the scale of development in high density residential areas under the Territory Plan.

Refer also section 3.1 'Design, siting and character of this report.'

3.4 Environment and heritage

Comments received

Feedback from the community identified the site as being renowned for its natural attributes, beauty and landscape characteristics. For many respondents, the proposed development represents a significant degradation of the environmental values of the site, with a common perception being that it is developer's practice to destroy unique landscapes and characteristics.

A key issue raised in respect of environment and heritage matters concerned the rocky outcrops located on site. Many people were critical of the proposal to remove the rocks, and provided background to their history and importance from many perspectives including historical and geological. Some people also sought for the correct terminology to be used; while the Concept Plan referred to Limestone outcrops, they are Volcanic Dacite.

Although the rocky outcrops were recognised by the developer in their Concept Plan documentation, submitters and respondents to the survey advised that the outcrops have a longer history and importance than that suggested. The outcrops have significance in an Aboriginal cultural context, as well as for the European history of the area.

Appeals were made for the outcrops to receive protection through a heritage listing, with some suggestion that previous attempts to place the 'Ainslie Volcanics' on the ACT Heritage Register were flawed. Submitters considered that the rock outcrops need to be preserved in their current location as a distinctive natural marker, and in recognition of their significant cultural importance. This would also allow for ANU students to continue using the rocks for study purposes as they do now.

The community recognised that previous site designs retained the rock outcrops, and that the

There was some perception that heritage assessment processes, including the EPBC assessment was flawed and wrongly allows for the removal of the rock outcrops, the offsetting of the endangered species and ecological communities.

Some concern was also raised regarding the impact of development on ecological communities located on adjacent land. A number of suggestions were made to help mitigate the impacts of this occurring, including:

- declaration of the site as a cat containment area
- fencing of the entire grassland and woodland area to the north of the site during the construction period
- landscaping to contain no species that may become invasive and spread beyond the development site
- the logs from native trees removed on the site should be placed in the woodland adjacent or in Mount Ainslie Nature Reserve to enhance habitat
- developers should work with other stakeholders to ensure the long term protection of the adjacent woodland and habitat areas, for example through educational programs.

One submitter indicated that the following measures must be undertaken as a matter of priority:

- the site be rezoned to a new classification, being Aboriginal heritage
- Mount Ainslie be renamed
- immediate remediation of the site to return to pre-1920 traditional ownership and suitable land care practices adopted (including removal of massive rabbit warrens, controlled burns and protection of grassland)
- a Custodian for the site be appointed
- the establishment of a First People walking track and heritage trail encompassing Corroboree Park, the Foothills, Mount Majura and Mount Ainslie reserves that explains the history and culture and protects and respects the First peoples beliefs and law.

NCA response

EPBC referral no. 2014/7372 is relevant to the site, with the proposed action to develop Blocks 4 and 5 Section 38 Campbell for medium to high density development approved in July 2018. This determination was made by the Department of the Environment and Energy, and the proposed Concept Plan is not inconsistent with the EPBC approval.

The rock outcrops are not listed on any heritage list or register. The decision to list or otherwise is determined by regulators other than the NCA. Doma has indicated their intention to reuse the rock from the outcrops within communal landscape zones (for example, as part of ground cover or retaining walls). The re-use of the rock is being considered as part of the detailed design for the site.

Suggestions concerning mitigation of the impacts of development on adjacent land are relevant to the development process generally, and may be implemented at different stages of the development process. Approval of the Concept Plan and revised DCP can occur independent of these matters being resolved. Some matters, such as fencing of the site to prevent the spread of

invasive or introduced species is proposed in the Concept Plan, and also responds to conditions of the EPBC approval for the site.

Establishment of a walking track, and renaming of Mount Ainslie are processes that need to be explored by relevant stakeholders separately to the Concept Plan and DCP process. For example, the renaming (or co-naming) of Mount Ainslie is relevant to the work of the ACT Place Names Committee.

The issue of Aboriginal land ownership and title is addressed through the *Native Title Act 1993* (Native Title Act). The Native Title Act recognises and protects native title. Native title describes the recognition by the Australian legal system of rights and interests of Aboriginal and Torres Strait Islander peoples to land and waters according to their traditional laws and customs.

The Native Title Act was a result of the historic Mabo decision by the High Court of Australia in 1992. This decision resulted in the High Court:

- rejecting the doctrine that Australia was *terra nullius* at the time of European settlement
- holding that the common law of Australia recognises a form of native title that reflects the entitlement of the indigenous inhabitants of Australia, in accordance with their laws and customs, to their traditional lands
- holding that native title is extinguished by valid government acts that are inconsistent with the continued existence of native title rights and interests, such as the grant of freehold or leasehold estates.

Special procedures for the just and proper ascertainment of native title rights and interests are established under this legislation. A search of the National Native Title Register indicates that that there have been no attempts to establish native title over land within the ACT.

3.5 Access to Campbell High School

Comments received

Many people noted that with redevelopment of the site, the existing drop-off/pick-up point for parents and carers delivering and picking up children from Campbell High School will be removed. Concern was raised that the alternatives available, such as using the school's entrance off Treloar Crescent, were not safe or would result in increased traffic pressures at intersections and on Limestone Avenue.

It was requested that the access to Campbell High School via the shared boundary of the development site and the school be retained. Comments were also received that paths with pedestrian crossing points would also help ensure the safety of children travelling to and from the school (as well as pedestrians in general).

NCA response

The developer does not have an obligation to facilitate drop-off/pick-up arrangements for Campbell High School and has elected not to do so.

Campbell High School was identified by the NCA as a key stakeholder for public consultation purposes and was directly notified of the revised DCP and Concept Plan. No comment was received concerning the retention or otherwise of the existing drop-off/pick-up point.

3.6 Transport, movement and parking

Comments received

Concern was raised regarding the traffic generated by the development and its impact on both Limestone Avenue and more broadly the local road network. Comment was also received that the lack of public transport in the area will exacerbate things and that there will be no option but for residents and visitors to drive.

A number of submitters provided local knowledge about traffic conditions in the area. For example, traffic on local streets such as Hayley, Quick, Ebdon, Duffy and Chisholm Streets is already heavy in peak times. Increased traffic on residential streets will impact safety and resident amenity, including children travelling through suburbs to local schools. The requirement for all traffic exiting the development to turn-left into Limestone Avenue was also expected to create significant issues at the round-about at the top of Anzac Parade.

On-site parking provision was also scrutinised, with concern raised that insufficient parking for both residents and visitors on site will result in overflow parking in nearby residential areas. The NCA was urged to critically examine the level of parking to be provided as there is some public perception that developers underestimate parking demand.

Some commentary was received concerning cycling infrastructure, with a wish for cycling access between Hayley Street and Treloar Crescent to be maintained. This is desirable as cycling on Limestone Avenue is dangerous with narrow lanes and heavy traffic.

There was an expectation that an independent traffic study should be completed. While the developer has prepared a study, there is an inherent conflict of interest given that the developer is the one funding the study. Several submitters suggested that the report provided fails to address a number of issues or adopts questionable assumptions, including concerning stated delay times at intersections, the potential for rat running and accidents caused by delays, and the impact that removal of the drop-off/pick-up point for Campbell High School.

NCA response

The traffic impact assessment, prepared by AECOM and submitted by the developer in support of the Concept Plan has been reviewed by the ACT Government's Transport Canberra and City Services Directorate (TCCS). TCCS has undertaken an independent review of the proposed development and has provided in-principle support subject to an updated traffic report being provided at the detailed planning stage. This report is subject to further review by TCCS and will also be available for public review during public consultation on detailed development plans for the site.

The NCA is satisfied that sufficient parking will be provided on-site, for both residents and visitors. The DCP requires that parking provision be consistent with the Territory Plan's Parking and Vehicular Access General Code. The townhouses in particular, will have parking provided at

a rate beyond that required by the code. Up to four parking spaces will be provided for larger (three to four bedroom) townhouses, with a minimum of two car parking spaces provided for two bedroom townhouses. At least one car parking space will be provided for one or two bedroom apartments, and two car parking spaces for three or four bedroom apartments. Visitor car parking will be provided at the rate required.

No changes are proposed to the current off-road cycle and pedestrian routes between Hayley Street and Treloar Crescent. These are not located on Blocks 4 and 5 Section 38 Campbell and will not be directly impacted by the proposed development.

3.7 Site landscape

Comments received

In addition to the broader landscape issues associated with environment and heritage (addressed in section 3.4 of this report), a number of detailed comments concerning on-site landscaping were received:

- The tennis court is unnecessary when there are multiple public courts nearby. Instead, the rocky outcrops located in the vicinity of the tennis court could be incorporated into the landscape design for the site.
- Existing trees should be retained on site and incorporated into the landscape design.
- A set back of 15 metres from Limestone Avenue is insufficient to achieve appropriate deep root planting which allows trees to thrive and to contribute to the landscape character of the site.
- The following comments made by the Design Review Panel are support, although they do not appear to have been addressed:
 - *1.2 The panel previously expressed concern for the inherent qualities of the site that have not yet been realised in the proposed landscape design, specifically retention of the large remnant eucalypts, management of the level changes and the existing limestone outcrops. This issue remains as it is considered an important consideration at the concept plan stage. The panel recommends that the proponent further explore opportunities to integrate these existing site features as part of the common open space network. Ensuring that key features of the site are better integrated with the broader design of the proposal will result in a greater contextual response for the proposal.*
 - *2.4 The panel support the proposal of additional native trees to be planted informally at the edges of the site and outside of the block boundary to 'soften' the edges of the site and provide a transition between the external landscape context and the site. The panel would anticipate native tree species capable of growing to a scale of between 15 and 20m and which integrate the site with its surroundings. Similarly, the panel supports the proposal to integrate a variety of fence treatments at the edges of the site to provide some transparency and visibility into the development.*

NCA response

The NCA considers 15 metres sufficient to provide deep root planting to the Limestone Avenue frontage. More broadly, the conceptual landscape plans show extensive deep root planting across the site (in excess of 30 per cent of the site area). The existing Limestone Avenue verge conditions will also contribute to the landscape character of the site, with the existing large eucalypts to be retained along this frontage.

The site as a whole will be planted with a mix of native and exotic species, with native species to be planted predominantly at the perimeter of the site to enhance the relationship between the site and Mount Ainslie. Exotic species provide a gesture to the more exotic, formal plantings in nearby suburbs such as Reid.

The Design Review Panel recommended increasing the extent of soft landscaping along the central driveway and at the interface of the apartment buildings, and allowing the surrounding native landscape to filter into the site to provide a less formal landscape to the perimeter of the site. These recommendations were accepted by the Doma design team and incorporated into the landscape plans. There is also agreement between Doma and Campbell High School for Doma to provide additional native plantings on the Campbell High School site.

The conceptual landscape plans provided as part of the Concept Plan will be refined at the next stage of planning and design. More detailed plans will be available for public comment, including the species mix and the locations in which they are to be planted.

A private tennis court is proposed to contribute to on-site amenity for residents.

3.8 Overshadowing, overlooking and solar access

Comments received

Several submitters raised concern about overshadowing, overlooking and solar access issues. Comments received included:

- the two apartment buildings will overshadow Limestone Avenue for much of the day
- there should be no overshadowing of Campbell High School playing fields between 8am and 4pm
- there will likely be overlooking of the townhouses by the apartments
- the solar aspect of many of the dwellings is poor. The apartment buildings have their short ends facing north and their long ends facing east or west. East facing apartments will get only morning sun (and no distant views) and west facing apartments will get hot summer afternoon sun.

The lessees of a block directly impacted by the proposed changes to the DCP regarding overshadowing made the following comments:

- An approved development application is in place for a knockdown rebuild of an existing dwelling on Limestone Avenue. The design of the dwelling includes rooms fronting this road to take advantage of the morning sun.
- While Doma has taken care to ensure solar access to dwellings on its site, it has not had the same consideration for dwellings external to the site.

- The proposal to allow an additional 30 minutes of overshadowing of blocks on Limestone Avenue in the morning is not acceptable.

NCA response

Shadow analysis demonstrates that on the winter solstice, residential blocks opposite the site will be out of shadow by 9.30am (dwellings, existing and proposed, will be out of shadow by 9.20am). On the summer solstice, all shadows are contained on the site from 9.30am.

Campbell High School tennis and netball courts and fields do not experience overshadowing till approximately 2.30pm on the winter solstice. This is outside the morning and lunchtime recess periods. There is therefore minimal impact on the amenity of these play areas. Campbell High School was identified by the NCA as a key stakeholder for public consultation purposes and was directly notified of the revised DCP and Concept Plan. No comment was received concerning the proposed overshadowing. The proponent also met with the principal of the school who confirmed that they did not object to the extent of overshadowing.

Detailed solar access diagrams for the apartments and townhouses will be lodged with the detailed development plans. The intention is:

- The townhouses are arranged to balance solar access, outlook and privacy. There are a variety of townhouse designs but all include ground floor living spaces that extend from the front to rear façade of the dwelling. This will ensure that every townhouse achieves solar access throughout the day, regardless of orientation.
- Around 45% of townhouses will be oriented east-west and will receive morning sun to one living space and afternoon sun to the other. The remainder of the townhouses are oriented north-south and will receive sun throughout the day to the northern living room only.
- The two apartment buildings are oriented toward the north and offset to maximise outlook and privacy. Apartments are oriented to the north, east or west, with no solely south facing apartments. Solar access to apartments will meet solar access requirements in place in other parts of the city, such as Northbourne Avenue.
- Where apartment face north, deep balcony overhangs will provide protection from summer sun. Where apartments face east or west, living spaces will extend to the façade to maximise solar access, and vertical screenings will be used to provide protection from early morning or later afternoon summer sun.

3.9 Changes to Development Control Plan

Comments received

Several submitters provided commentary concerning the proposed changes to DCP 16/01. The comments generally indicated a perception that the proposed changes were only being made to facilitate the proponent's plans. It was noted that the process to amend the DCP appears at odds with the purpose of a development control document, whereby the planning framework and development control provisions are in place first, to guide subsequent development plans.

The following comments concerning changes to DCP 16/01 were received:

1. The DCP proposes to change the requirement for an assessment of the proposal against the ACT's Planning Strategy to occur prior to development rather than at the Concept Plan stage. If the NCA will not ensure that the DCP is consistent with the Planning Strategy, the existing requirements of the DCP concerning the timing of an assessment against the Planning Strategy should remain in place.
2. DCP 16/01 requires development to be of both an appropriate scale to Limestone Avenue, and in relation to adjacent residential development and community facilities along the avenue. The revised DCP proposes to remove the latter reference, suggesting that the developer acknowledges that the proposal will not be sympathetic to existing development. An assertion was made that an 'appropriate scale' is around three to four storeys.
3. It is proposed to change the requirement to 'demonstrate that the proposed height of the buildings shall not dominate the landscape setting of the locality' to 'demonstrate that the height of the buildings shall minimise overshadowing to surrounding developments and the landscape setting'. Again, this could be construed as a concession that the construction of two eight-storey apartment blocks may in fact dominate the landscape setting.
4. There is concern with the following changes, largely due to a diminution of the language used and therefore the potential to adequately control development:
 - In Part 2 it is proposed to include the words *'The development anticipated in this DCP is akin to development that is currently permitted in the Territory Plan RZ5 high density residential zone which is to apply to the site once the land is transferred to Territory land'*. However, there does not appear to be sufficient detail provided to date about the potential height above ground level of the two apartment buildings to know if the buildings will be compliant with RZ5 requirements. Further, the RZ5 zoning permits buildings to 21.5 metres in height only where that is consistent with the desired character of the area.
 - In Part 4 the inclusion of the words *'Building heights in each block shall be no higher than the built envelope depicted in Figure 2'*. The building height required in the DCP should be consistent with RZ5 requirements. It is not clear from the information currently provided for public consultation whether building to RL 617 will limit the building height to the RZ5 limitation of 21.5 metres.
 - In Part 4 the replacement of the words 'not cast a' with the words 'minimise'.
 - In Part 4 the removal of the words *'All plant and equipment are to be totally concealed from view from Mount Ainslie and Limestone Avenue'*. The vista from Mt Ainslie in particular is an iconic Canberra vista and should be protected.
 - In Part 5 the replacement of the word 'maximise' with the word 'appropriate'.
 - In Part 5 the replacement of the words 'take into account' with the word 'consider'.
 - In Part 5 the removal of the words 'retain existing trees where possible'.
 - In Part 5 under the heading 'Supporting Reports and Studies' the proposal to require completed reports prior to approval of the works plan instead of prior to approval of the concept plan. It is important to the community that all the

relevant reports are completed and available for consideration prior to the concept plan being approved and the works proposal proceeding.

- In Part 5 the removal of the requirement to address 'the existing storm water problems experienced on the Limestone Avenue frontage of the site preferably utilising onsite methods'.
- In Part 5 the removal of the requirement to provide a heritage assessment and heritage impact statement and to provide them to the ACT Heritage Council for consideration.

Some comment was also made regarding building heights in the DCP. Issues concerning building heights and the NCA's response are detailed in section 3.3 of this report.

NCA response

Public consultation on the revised DCP and Concept Plan occurred concurrently to enable the public to better understand what could be proposed on site as a result of the changes to the DCP. This approach was adopted to maximise transparency on the development proposal.

In response to each of the numbered points above:

1. A response to the relationship between the site and the ACT Planning Strategy is outlined in section 3.2 of this report. The planning report provided as part of the supporting documentation for the Concept Plan included discussion concerning development of the site and its consistency with strategic directions of the Planning ACT Strategy. The change to the DCP recognises that the DCP will also apply post-approval of the Concept Plan and that further assessment against the Planning Strategy should also occur at the detailed planning stage and prior to the approval of works.
2. The intent of the clause remains, that to provide for buildings to be of an appropriate scale to the site context. Permitted building heights for the area adjacent to Limestone Avenue are not changing, with a reduction in building heights proposed for the remainder of the site.
3. The intent of the clause concerning the relationship between development and the landscape remains. Other provisions of the DCP assist in maintaining the landscape character and ensuring that on-site landscaping contributes to the
4. Building height matters are discussed in section 3.3 of this report. The section concerning heritage consideration has been updated in recognition that the EPBC process has been completed. Changes to the DCP provisions concerning the treatment of storm water do not diminish the intent for a water resource management strategy to be devised consistent with standards for development elsewhere in the Territory. This includes the preference for storm water issues to be managed onsite. The change requiring reports and statutory processes to be completed prior to the approval of works recognises that while a range of report and studies have been prepared to support the Concept Plan, further work is required based on detailed development plans. No works can commence on site until all necessary studies have been completed and clearances by government entities obtained. The NCA is of the view that other changes to language will not diminish the intent of the relevant clauses.

3.10 Public consultation process

Comments received

Mixed reviews were received regarding the NCA's public consultation processes. Favourable comments included:

- The public information session was well run and informative, providing attendees a better appreciation of the site constraints and the proposed development concept.
- The materials provided by the NCA during the consultation period were useful in gaining a 'feel' for the proposal.
- The publicity and the comprehensive basic studies and documentation available on the NCA website was impressive.

Conversely, other people viewed the extent of information available as too much to readily assist the public in understanding the proposal. It was also suggested that the complexity of the project is a deterrent to engagement, and failure to differentiate between the many stakeholders a devise a variety of techniques for engagement may produce a narrow set of findings. Because of this, the NCA should not construe a low rate of engagement to undermine the credibility of concerns raised.

Both the NCA's consultation process, and that previously undertaken by Doma, was criticised as being a formality. There was some perception that Doma has disregarded the concerns previously expressed by residents, and that the NCA has only 'informed' people about the proposal rather conducting genuine consultation. Comment was also made that there has been a lack of consultation with the local Indigenous community.

A suggestion was received that further consultation is required to enable the developer to respond to Design Review Panel comment. It was also noted that the DCP should be approved first, because although the DCP and the Concept Plan are interdependent, the planning framework must be agreed in advance of any Concept Plan being approved.

Although not related to the consultation undertaken by the NCA on the revised DCP and Concept Plan, comment was received that the lease variation process is inappropriately out of site of the community.

NCA response

Public consultation on the revised DCP and Concept Plan were undertaken in accordance with the NCA's 'Commitment to Community Engagement (August 2015)'. The commitment acknowledges the International Association for Public Participation's (IAP2) Public Participation Spectrum, which demonstrates the possible types of engagement with stakeholders and communities. The spectrum includes consultation approaches ranging from 'informing' the public, to 'empowering' the public.

The NCA elected to undertake public consultation at the 'consult' level of the Public Participation Spectrum, with the goal to *'obtain public feedback on analysis, alternatives and/or decisions'*. The corresponding 'promise to the public' involves keeping people informed, listening to and acknowledging concerns, and providing feedback on how public input influenced the

decision. The spectrum subsequently identifies examples of tools that may be used at this level of public participation, such as inviting public comment, surveys, and public meetings.

The NCA has undertaken consultation with a view to obtaining feedback on a proposal, using such tools as a survey, inviting submissions, meeting with stakeholders, and hosting a public information session. A range of tools were also used to notify stakeholders of the release of the DCP and Concept Plan for consultation, such as a letter box drop, public notices in print media and online, direct emails and letters to known stakeholders. This consultation report provides feedback on the issues raised by the community and how this has resulted in variations to the proposal and ultimately the final decision concerning the DCP and Concept Plan. The NCA considered each issue raised on its merits, and was not influenced by the number of people who provided comment on the matter.

The information provided during the public consultation period was that required to be prepared as part of the Concept Plan. The NCA conducted a public information session and further information was available by phone or email for members of the public who had questions or needed further advice concerning the proposal.

The National Capital Design Review Panel (NCDRP) is an advisory body and a proponent is not bound by the recommendations of the panel. The NCA did however, engage with DOMA to work through the matters raised by the NCDRP, with some recommendations being reflected in the proposed Concept Plan and others representing a compromise. The final decision making power resided with the NCA.

The NCA chose to undertake public consultation on the revised DCP and Concept Plan concurrently to enable the public to better understand what could be proposed on site as a result of the changes to the DCP. Because of this approach, the NCA also elected to also endorse both documents concurrently. Regardless of the approach taken, the Concept Plan could not have been endorsed without the approval of the DCP.

The lease variation process is managed by the Department of Finance, and is not required to be publicly notified.

3.11 Fire and bushfire hazard

Comments received

Question was raised that under increasingly dynamic and intense climate conditions, what fire protection will be in place for the site.

NCA response

ACT Fire and Rescue reviewed the Concept Plan document and provided comment via the submission from the ACT Government's Environment, Planning and Sustainable Development Directorate's submission. Advice from ACT Fire and Rescue indicated that they have reviewed the bushfire assessment report prepared by Bushfire Protection Planning & Assessment Services Pty Ltd and concurred with its findings and recommendations including the provision and specifications of:

- Asset Protection Zones (temporary and permanent)

- water supplies
- specific bushfire construction requirements for structures, including the use of alternate solutions to reduce bushfire attack level (BAL) ratings
- any other ACT Fire and Rescue recommendations.

Some comments were made by ACT Fire and Rescue concerning the need to further resolve the Asset Protection Zones, water and access arrangements. Further work will be undertaken regarding these matters prior to the finalisation of detailed development plans.

3.12 Other matters

Comments received

Other, more specific comments received included:

- development of a High Speed Rail station on Ainslie Avenue, as currently favoured by the Department of Infrastructure, Transport, Cities and Regional Development, has mutually beneficial synergies with the proposed development
- the plans show little detail and it is difficult to determine what actually is proposed.

Examples of particular detail included:

- Will embedded energy of the building materials be chosen with regard to sustainable sources and whole of life?
- Will the energy efficiency be 6++ rated?
- Will there be a system for domestic waste management (in particular kitchen green waste) recycling?

NCA response

The NCA notes commentary regarding relationships between development of the site and potential High Speed Rail infrastructure nearby.

The Concept Plan does not represent the detailed plans for the site. The intention is to conceptually show the development intention for the site, with further detail to be provided at future stages of the planning and design process. The Concept Plan documentation is not intended to, and is not required to show details of matters such as waste management or building materials.

4 Conclusion

The draft Concept Plan and revised DCP were released for public consultation in June 2019 in accordance with the NCA's 'Commitment to Community Engagement (August 2015)'. Thirty-one written submissions and 61 responses to the survey were received in response to the documentation made available for public consideration and comment.

In response to submissions and other commentary received during the public consultation period, no changes to the Concept Plan and revised DCP have been made.

Attachment A – Survey results

Question 1 (optional): What is your name?

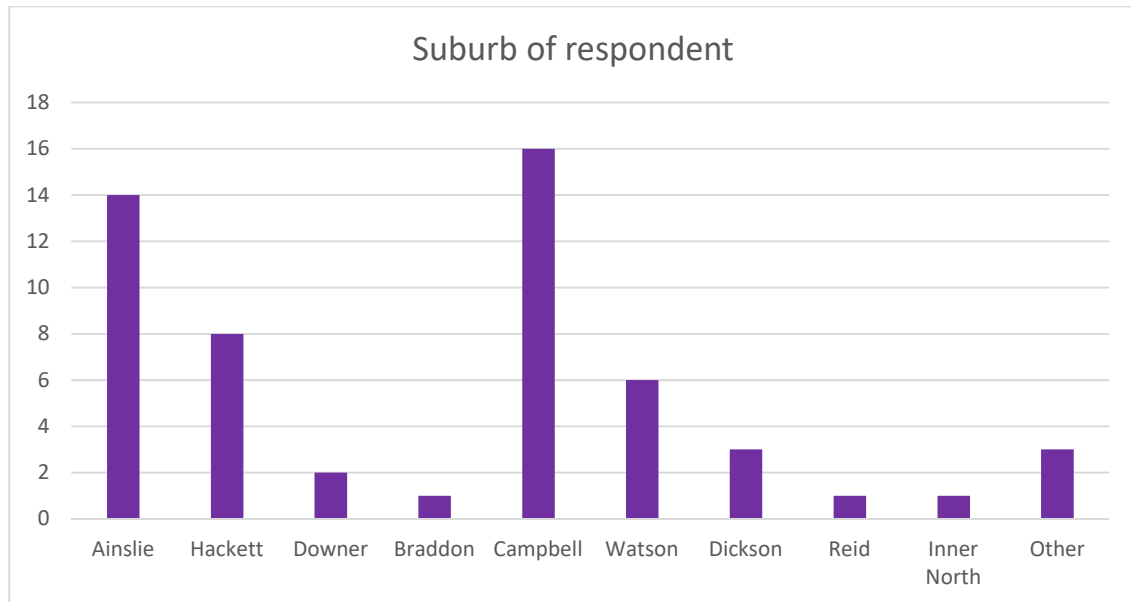
Forty-six people responded to this question. In some cases, full names were given, in others only initials or first names were provided.

A number of people who responded to the survey also provided a written submission in response to the Concept Plan and revised Development Control Plan.

Question 2 (optional): What suburb do you live in?

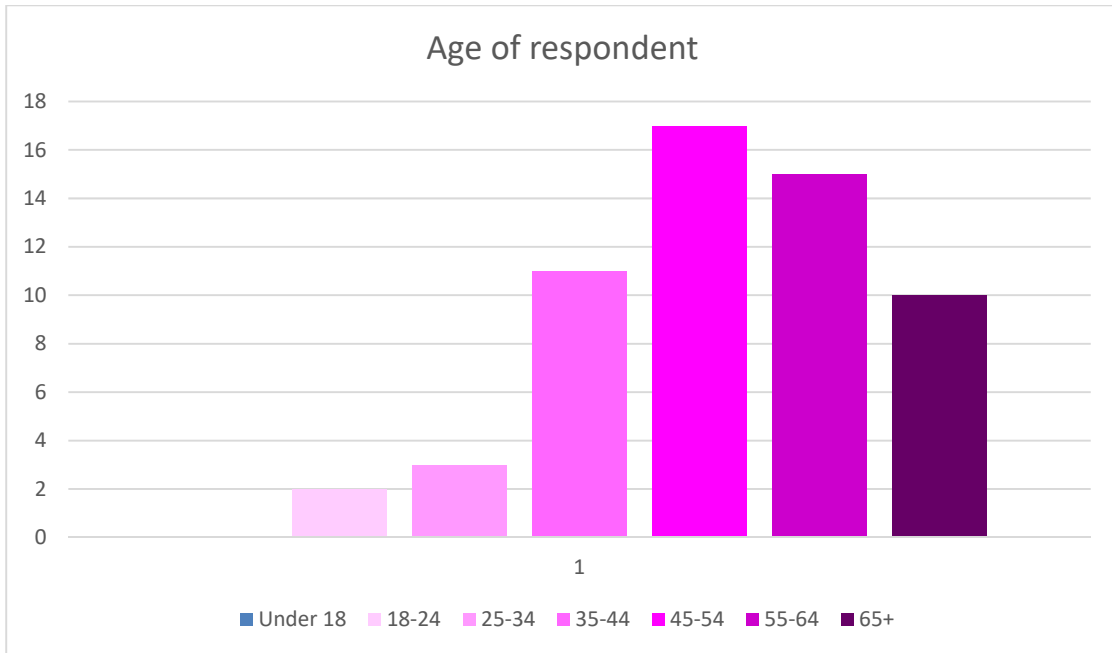
Fifty-five people responded to this question. The majority of respondents indicated that they live in the Inner North suburbs of Canberra, with Ainslie and Campbell recording the highest number of respondents (14 and 16 respectively).

Of those who responded that they resided outside the Inner North, there was one respondent each from Bruce, Oaks Estate, and Gungahlin.

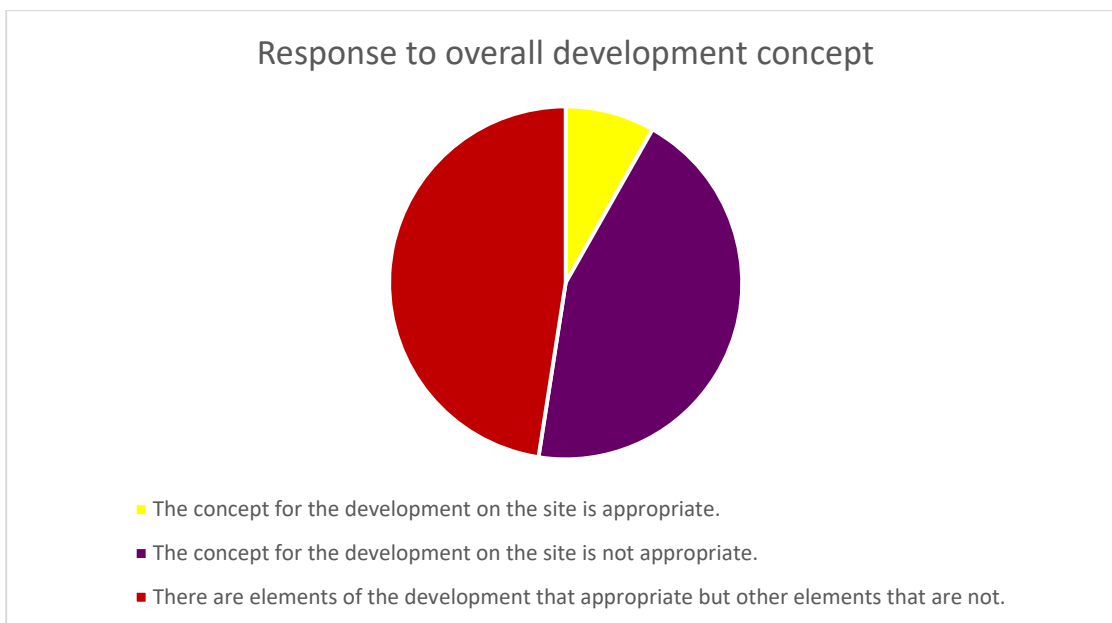


Question 3 (optional): What is your age?

Fifty-eight people responded to this question. The majority of respondents were aged 45+ (42 respondents or around 64% of all respondents), with a minority aged under 24 years of age (two respondents or around 3.5% of all respondents).



Question 4: What do you think about the overall concept for development on Blocks 4 and 5 Section 38 Campbell?



Of those who indicated that the concept for the development on the site is appropriate, the following comments were received:

- Increased density in this area is clearly appropriate. Should be accompanied by better pedestrian and bike facilities on Limestone Ave.
- Consideration needed for increased traffic along Limestone Avenue. When the AWM closes in the evening, traffic from the underground carpark that wants to head west makes its way around the roundabout at Creswell / Treloar intersection. This slows the traffic heading west along Fairbairn coming from the airport/ADFA/Campbell Park. Traffic then merges at the roundabout at the top of Anzac Parade. Cars making their way into/or exiting the new development will add to the current congestion, particularly in the morning and afternoon at peak hours.
- Looks great. Not high density and provides an effective use of the land.

Of those who indicated that the concept for the development on the site is not appropriate, the following comments were received:

- Less than a third of the site has buildings that have some solar orientation. So only a small number of residents are likely to get solar access. Also, whilst I note access for students to Campbell High is to be maintained, there is no adequate turning circle option for vehicles that drop off students to safely turn and exit from the site. I see no apartment sustainability plan that accounts for energy usage - no plan for minimization of energy usage. Obviously if there has been no accounting for solar access in the plan, large numbers of residents will be forced to use large amounts of energy for cooling in summer and heating in winter. I see no plan that covers insulation qualities of wall and roofing materials, something that would further reduce residents' energy consumption and consequential costs.
- This is community land. The proposal does not state whether this is commonwealth land or now in private hands,. The value to the ACT community has not been assessed.
- The site is landlocked on three sides. It is at the foot of a significant natural landscape formation - Mt Ainslie which is a recreation and bush land open space already at the point of over use by tourists locals and joggers working in Civic and at the Defence Park nearby who jog in their lunch hour. There is not sufficient access for the 800 cars that under the plan will put out onto an already bottle necked road. The proposed development footprint should be no larger on the ground level than the previous buildings; no higher than the previous buildings; maintain the same are backs and if anything more green space around them. The site should reflect the woody grassland that is the natural vegetation for this area. Our suburb has already 75 percent apartments which are between two (old public housing apartments). The higher rise apartments in Lonsdale Street and other areas at the edge of the city are collocated with commercial buildings which are of the same height. Do not break the existing building code to destroy such a beautiful natural landscape.
- There will be too many residences, insufficient parking (for residents and visitors), apartments too high destroying the historical appearance of limestone avenue and the war memorial area, and removing the feeling of space that has been characteristic of the inner north.
- Too many people crammed in to the site. Too tall for the surrounding area. It will be a complete eyesore and will significantly worsen an already problematic traffic area

- Over developing a site in close proximity to nature reserve of Mt Ainslie, Campbell High School and the War Memorial. Bringing that many additional residents and cars also creates a traffic and congestion issue. Always with every development no additional road resources or traffic management plan is considered. This development is a blight on the heritage and open spaces of the area.
- The height of the apartment buildings 7-8 stories would overpower the entrance to the war memorial, making a mockery of the \$500 million being spent to enlarge it and the story of sacrifice that it represents.
- Too many dwelling on the site and building height inappropriate for the area
- This is an excessive, crowded, inappropriate proposal that will greatly change the character of the area, aesthetically dominate the surrounding land use, and disrupt visually important and pleasing sightlines around the district. The heights are grossly inappropriate for the area, as is the density.
- This is a highly visible and prominent site with symbolic value on the lower slopes of Mt Ainslie. The bulk of the 2 apartment buildings close to Limestone Ave, the high school and the War Memorial will obscure views of natural landscape and loom large relative to their surroundings. Modelling is necessary to enable a transparent conversation about what the visual impact will be from various vantage points, and traffic modelling is essential to prevent excessive congestion at peak periods and minimise the risk of accidents.
- The development should be no higher than the trees around it. That is 3 stories or so.
- The buildings are too high and therefore too visible with regard to the national importance of the site. The site is very close to one of our most important national buildings The massive impact of a huge increase in traffic has not been taken into account at all. The NCA is toothless and does not seem to care anyway. This plan is a purely commercial one which trashes the heritage of our bush capital, and the quality of life of its inhabitants. It will irrevocably degrade the inhabitants' environment.
- The development as proposed is not appropriate due to height, density and design. It fails basic tests of architecture, does not improve the lifestyle of surrounding residents, and detracts from the natural vistas and public monuments close by.
- Happy with the townhouse concept. Not happy with height of apartment buildings. Should be limited to 4 storeys.
- The development is far too dense.
- lower height for the two towers would help retain a suburban character for the precinct
- The aesthetics of this site are too valuable to allow this so-called development. It is currently a community facility block.
- I am worried about traffic management to the area. There are over 500 car parks for one driveway in and out of Limestone. Will Quick street be used as a backup for vehicles. This street is already at capacity in the morning with vehicles using it as a slip road to get onto Limestone Avenue.
- Appalled at the scope of this development. Environmentally, it will encroach on endangered species habitat. The shade from the towers will drastically affect the land surrounding. (Will it affect nearby residents?) Visually it will be intrusive, destroying the views of Mt Ainslie & the War Memorial. Seven stories is ridiculous and intolerable so

close to a nature reserve. Say nothing of the trend of dangerously cheaply built and poorly regulated developments in ACT & NSW. There is inadequate infrastructure for a development of this size. The children at the school will have difficulty gaining ingress/egress to the school, and hundreds of newcomers in high-rises looming over the school, the safety of the children is compromised. The CSIRO should have been heritage listed as an important site, but now that it's gone forever the land should be treated respectfully & not paved over for Doma's quick buck at Canberra's expense.

- It is too large, not appropriate for the existing style of the neighbourhood and a misuse of such valuable land.
- 7 - 8 storeys is too tall. Loss of old trees is not appropriate given the level of enforcement of tree retention for Ainslie residents, shadowing of Campbell High
- I think the site should be retained for public or community use and not be rezoned for more apartments. There are far too many apartment blocks in the vicinity eg the Campbell 5 precinct and the new building north of Civic. Why not offer the land to the Australian War Memorial? Or build a new public pool? Please, no more apartments.

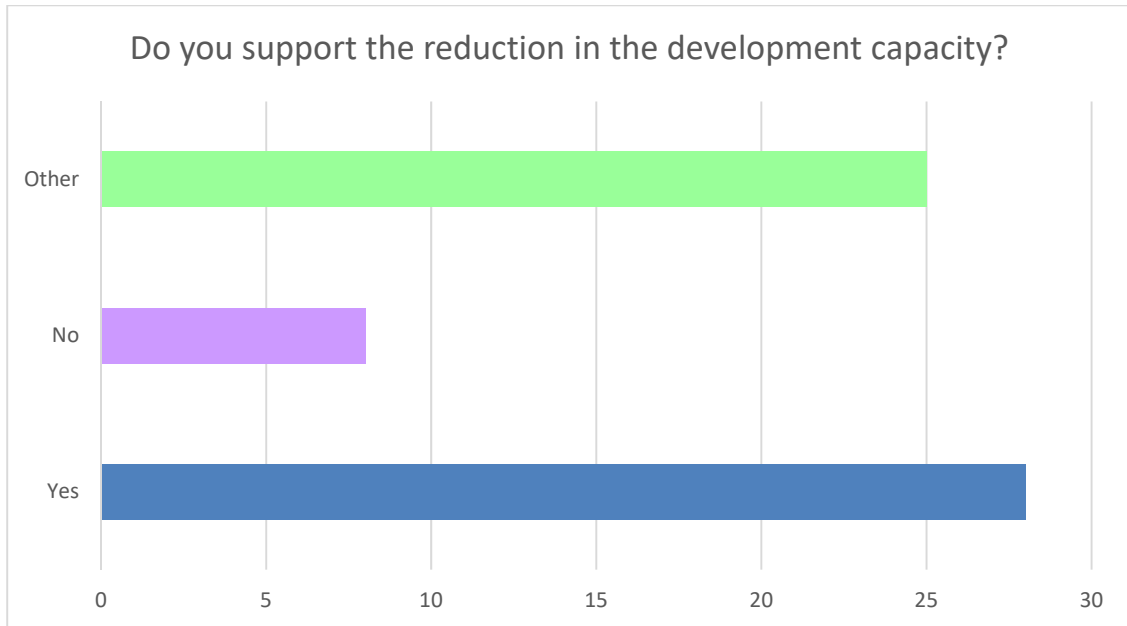
Of those who indicated that there are elements of the development that are appropriate but other elements that are not, the following comments were received:

- I am support of urban infill generally but have concerns about the density and it's impact on the bush
- I believe it is essential to retain access to Campbell High School for cars and bikes to the rear of the development.
- I am broadly supportive of residential development on the site but have concerns about the scale (no of residences) and major concerns on the existing road and active transport infrastructure and how it impacts Campbell High
- The survey has lost my comments ! I will submit them to DCP@nca.gov.au !
- The development is needed in the area but not at such a large and crowded scale which does not suit the surrounding environment and housing. Public spaces, access and 'green areas' are not readily noticeable and maximisation has to do with greedy pockets of the developers squeezing as much into a space as cheaply as possible
- I have a concern about the preservation of distinctive rocks on the site the site, and the impact on traffic and roads in the area.
- The density is too high. The apartment blocks encroach visually on the Mt Ainslie reserve. They will set a poor precedent.
- There are too many dwellings. I understand urban infilling but this is too much, reduce the number of apartments/ houses by half AND invest in the required infrastructure to support this. Where are the kids you l've there going to school? All inner north primary and high schools are at capacity.
- Building are too high. They should be reduced to 3 to 4 storeys.
- I am concerned generally, about the developments going up everywhere. I understand we need to accommodate a growing population, but wish we didn't have to fill in so much of our green space, especially in the city.
- Buildings are too high

- Drop off zone for Campbell High School on high side is not included which will add to congestion in Limestone Ave. Also no bike access for the many student who ride through the reserve and Ainslie's streets from Ainslie, Hackett etc.
- Ensuring a safe and clear bike path for the large numbers of students who ride from Ainslie and Hackett through the reserve on the "back of the houses" track to Campbell High School.
- I believe that the maximum building heights are too tall and not enough prominence is given to green space
- The eight storey apartment blocks are inappropriate for the location.
- The development is too close to the road and too close to Ainslie Village. This does not allow passage through for walkers or bicycle riders coming from Ainslie and Hackett. This particularly affects Campbell High students, but also pedestrians walking to Civic and the War Memorial or just going for lunchtime walks in this previously accessible area.
- The proposed apartment building are far too high for this location and completely out of character with the area. The area is an important one from a national perspective given its proximity to the Australian War Memorial, Anzac Parade and the heritage listed suburb of Reid. The height of these buildings so close to Limestone Avenue will be amplified by the fact that they are further up the slope of Mt Ainslie than is Limestone Avenue.
- Building height is too high
- The scale of the development is not fitting with the surrounding uses and surely cannot be the desired character for the area. Positioning of the tallest buildings closest to Limestone Ave will reduce sight lines to Mt Ainslie and impact upon the visual amenity. Furthermore, access off of Limestone Ave does not seem like a preferable option. I drive along Limestone to work and back, and at peak times it's almost impossible to gain access to Limestone Ave unless at a signalised intersection. At potentially over 600 residents there will undoubtedly be significant delays exiting the site.
- Having just the one road to get into and out of the site will cause traffic congestion problems on Limestone Avenue during peak traffic hours. During weekday mornings this will make it very difficult for residents to depart, while in the afternoons there could be traffic problems at both the Ainslie Avenue intersection and the Quick Street intersection associated with traffic being unable to turn right and enter the complex if driving north on Limestone Ave. The Quick Street/Limestone Ave intersection is already problematic as a crossing point during afternoon peak hour traffic and the possibility of Section 38 residents using the intersection to effectively do a U turn will further exacerbate the problem. Second, the DCP talk about quality landscaping, but the mix of apartments and town houses has the potential to create body corporate management discord and result in poor landscape management. A single body corporate arrangement will see conflict with apartment owners on the lower slope not wanting to fund landscape issues higher up the slope, while multiple body corporates could result in a mish-mash of landscape management arrangements. These possibilities need to be dealt with as part of establishing an effective body corporate management scheme.

- This is a truly premium site and yet it looks like it is going to end up with more cookie cutter architectural rubbish that graces the foreshore of Kingston and Campbell C5. When are you going to insist on design standards that might just might if we had a few innovative architects lift a site like this to one of national ARCHITECTURAL significance?
- This block is too elevated to accommodate high rise towers. Development should blend discretely into the neighbourhood. The high rise towers will detract from the approach to the war memorial. The towers should be at least two storeys lower to remove the penthouses. Of all the land available for apartments in the territory, why spoil the national significance of this area?
- Any multistory (ie, 3+ floors) residential buildings on this land will detract from the views along the axis from Mt Ainslie to Civic. Moreover, to alter the balance of open space versus built structures in favour of built structures will be aesthetically displeasing to visitors and passers-by, let alone existing residents of the suburb.
- The additional traffic in the surrounding streets will turn quiet suburban streets into thoroughfares as already busy "rat runs" into congested traffic jams. The buildings are far too tall for the environment. They will dominate the landscape and affect the views of the War Memorial. They will not be screened by trees.
- The site is appropriate for residential use but the towers are too close to Limestone Avenue. They will overshadow Limestone Avenue and spoil the western approach towards the War Memorial.
- Building heights should be reduced from 7-8 stories to no more than 5-6
- To be honest it's pretty difficult to see the plans in any detail
- Are the trees to be retained ? Is affordable housing to be provided? Will it be gated community due to its isolation ? Will stormwater be captured (including vehicle pavements) and re-used? Will embedded energy of the building materials be chosen with regard to sustainable sources and whole of life With the energy efficiency be 6++ rated? Will there be a system for domestic waste management (in particular kitchen green waste) recycling? If any of these questions are answered "no" – as a Federal government leader in sustainable development please re-assess the sustainable urban design of the concept.
- I am not as familiar with the proposal as I would like to be (apologies, time constraints here). However I would like to request that there is access - vehicle and bike - provided into Campbell High School. The current situation provides for many many Campbell High Students to ride their bikes into school. It also provides for a drop off/pick up point, keeping traffic away from the main entrance which is already busy.
- \$20m sale price worthy of an Auditor General report! Building height limit relaxations would set an undesirable precedent, insufficient parking and traffic flow impacts.

Question 5: Do you support the reduction in the development capacity (from 60,000m² to 40,000m²) on the site noting that some of the minimum building setback widths have been reduced to accommodate the proposed development?



Those who responded 'other' to this question provided the following comments:

1. Yes I support a reduction in capacity, but I do not support any reduction in setbacks. But judging by the inadequate design with respect to little solar orientation and aesthetics of blending in with the mountain landscape, I see nothing to support this development.
2. N/A
3. No buildings at all should be built.
4. The building should be reduced not just the size
5. Reduce it to 200
6. I don't support the setback reduction nor the reduced building footprint
7. Better than nothing, but I didn't see the original proposal. Are they still cramming the same number of dwellings in to the area? I bet they are.
8. There should be no mass development.
9. Setbacks are not sufficient to minimize developments impact on war memorial and the amenity of the surrounding suburbs
10. I favour less than 40 000m
11. I support reduction in development capacity but am worried that the set back isn't big enough
12. I support the reduction in capacity, but requiring that this is "paid for" by unacceptably reducing setbacks is inappropriate and unnecessary.
13. This will still leave the site with too great a density.
14. still a bit concerned about development capacity
15. This appears to be a leading question, and presumes that 40,000 is a figure that has been arrived at through some sensible analysis. The assumptions built in to this question are unspecified. If the price paid for the site were the determinant, there should be no

- more than 20 units, so it's fair to say that most respondents will support the reduction and prefer a lesser floor space total
16. I support a more drastic reduction so that building setback widths can be not only restored but increased.
 17. The lesser GFA could be achieved with the original setbacks.
 18. I do not support the current plan. It does not improve the quality of life of the ACT residents and should not proceed.
 19. Too big a development that will make greatly detract from a lovely streetscape en route to the War Memorial.
 20. The smaller the better!
 21. I support the capacity reduction to zero.
 22. I am more interested in cubic square meters however less impervious surface is better for infiltration and stormwater management.
 23. Not fussed either way.
 24. Further reduce the capacity
 25. I don't support the development at all.

Question 6: What aspects of the proposed development do you particularly like?

This question was not optional. Sixty-one responses were received, however three responses were either a symbol (-) or a single letter and have not been included below. The following comments were received in response to this question:

1. Nothing in particular but I'm generally supportive of any features which are environmentally sensitive
2. Nothing
3. Support redevelopment of a disused site
4. No comment
5. Not applicable
6. None.
7. Townhouse concept
8. Please don't ask such a nonsense question. We need a model of the proposed development and write up a new building code to present the natural vegetation and a formula of 600 square metres of green space for each of the two hundred apartments to provide a native parkland around all four sides of the proposed building.
9. I like the overall style of the development, and the emphasis on landscaping and extensive use of gardens. I'm pleased most of the residents' cars are parked underneath the development.
10. None
11. Community spaces- there should be even more. Also no shops. With a high school next door having shops close by encourages kids to spend money and skip school.
12. Integrates well within the existing environment.
13. That the site will be used for something
14. That there will be a mix of apartments and townhouses (which will reduce the density of the development), and the landscaping.
15. None.

16. None
17. Landscaped public areas
18. Nope
19. Use of native plants for landscaping
20. Mixed residential
21. High density close to the city.
22. Lower townhouse style development.
23. None.
24. I don't think that the site should be redeveloped as residential
25. The terrace houses provide urban intensification in a nice location. I hope the design will be of high quality and well landscaped and not just the usual boxes.
26. It will be nice for those who live in it, but it blocks access to Mt Ainslie and to Ainslie for those who travel through this area.
27. The low rise of the buildings to the rear - this level is less intrusive .
28. Landscaping
29. The facades resemble development across the road from Telopea Park School, which was also contentious. The style is generally modern and somewhat blank
30. It's a prime location for development, especially as it's on a significant commuter corridor. The communal plaza and central avenue are a good idea as well, and the articulation of the larger buildings downplays their scale.
31. Location and the internal traffic management arrangements including parking.
32. The scale seems about right.
33. Low rise townhouses.
34. None. It is a good example of ruining a good open space simply for the purpose of making a profit.
35. None. The project should be reconsidered to ensure that height is reduced and the characteristics of the site such as rockeries and heritage trees are preserved
36. None.
37. None.
38. The fact that it is residential close to the city.
39. Nothing.
40. Not sure
41. Townhouses, communal areas
42. Townhouses
43. Nothing.
44. low level heights
45. The secrecy about it fills my heart with joy.
46. Reduced height. Retention of trees.
47. The likelihood of commanding views, central location, probable high return to Federal Government that could contribute to a sinking fund to further demonstrate High Quality Sustainable Urban Design – Is there an opportunity to include commercial activities to support/attract a certain % of affordable housing tenants with special needs (elderly and/ or mobility impaired/ centre link recipients and in doing so creating a community village atmosphere ? Diversity (age, income, ability, culture) is a must to stimulate

- community. To be successful in this it needs a Community manager's residence to live on site and co-ordinate and an element of social procurement
48. It uses a valuable piece of land very close to the city centre in a more appropriate way.
 49. The consultation process
 50. Modern design and mix of apartment and townhouse living
 51. The site-sensitive townhouse elements
 52. That trees will be planted
 53. Not sure I am in a position to comment here.
 54. I like the use of existing and proposed vegetation to shield the site from some directions
 55. Nothing in particular
 56. None
 57. Great position and taking alot of thought into what is being built
 58. Relatively low density including townhouses

Question 7: What aspects of the proposed development do you least like?

This question was not optional. Sixty-one responses were received however one response was a single letter and has not been included below. The following comments were received in response to this question:

1. Lack of access around the site, human pressures on adjacent bush including cats
2. The building height is too high. There is a lack of solar orientation for at least two thirds of the buidlings, which would house the largest number of residents. Thus the majority of people are missing out on solar access. Also only 2 trees on the block are being retained. The other 2 that are being "retained" aren't even on the site.
3. It is essential that there be access to Campbell High School from the north (Hayley Street) both for cars and, especially, the safe access of students on bikes. The Campbell HS catchment takes in the entire area north of the proposed development site to the far end of Hackett. We regularly use this access to drop our children at school as the alternative involves using the very congested Limestone Avenue. The increased traffic in the existing front carpark of the school as a result of the closure of the access through the proposed development site would also be dangerous and inconvenient. The development is an oppportunity to create a safe and purpose-built drop off area and bike access for a growing high school.
4. The development proposal is not clear on the impact on the current access road from Quick st near the entrance to Ainslie Village through to the former CSIRO carpark and access to Campbell High. This road is not named on the map. As it is not named will this road continue as the main access road to Campbell High for pedestrians, cars and cyclists. Is there allowance for car parking spaces for student pick up and drop up as Treloar Crescent is a major bottleneck. Treloar Crescent is a major bottleneck due to buses, cars and other traffic accessing both the school and the war memorial and major traffic flows in and out of Limestone Avenue. Ensuring good access for students travelling via active transport methods is very important in all decisions around the site. High numbers of residences could have significant impacts on safety and accessibility for students and carers alike. We are interested in how you wish to accommodate these needs and how this will interface with the boundary and development.

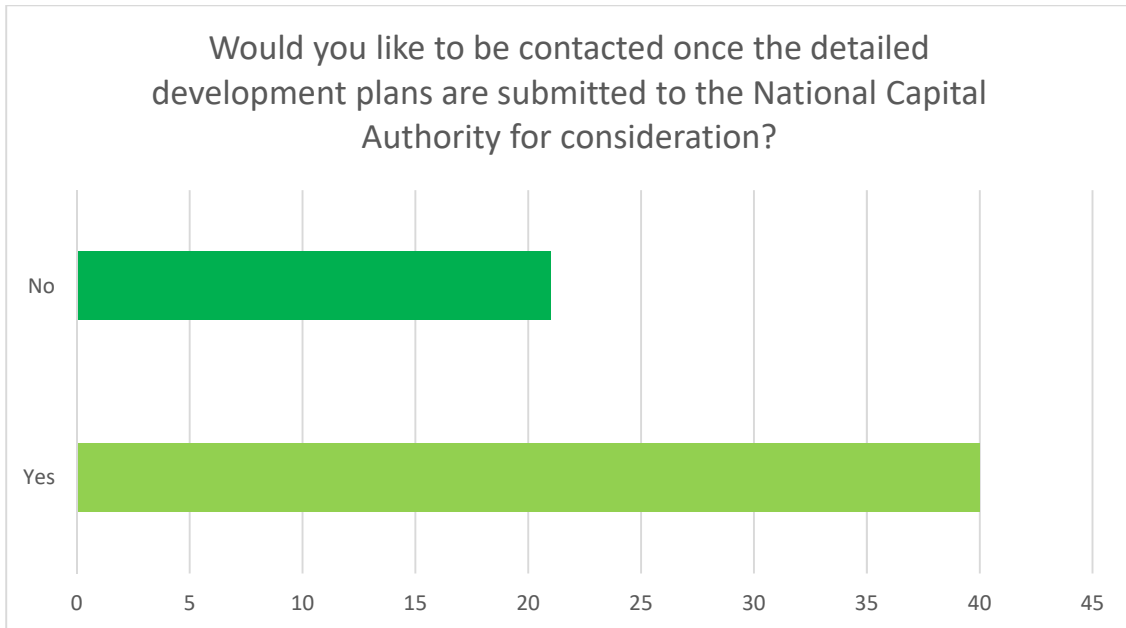
5. The survey has lost my comments ! I will submit them to DCP@nca.gov.au !
6. Loss of community land, threats to endangered ecosystems and species; but above all else, the lack of "government" planning and consultation with Canberrans. I want more green spaces, not fewer.
7. The high rise apartments and lack of green areas and communal facilities
8. The building height no higher than two stories. The number of dwellings no more than 200. The green space native grassy woodland vegetation. The traffic management to be subject to further consultation before the proposal is taken any further
9. I do not like the idea of losing a particular set of rocks that have been recognisably in situ from well before Reid and Canberra city were laid out and built. The rocks feature in an early photo of the Canberra site and are survivors of intense landscaping entailed in the building of Canberra to the Griffin plan. I also do not like the notion of so many cars having to leave and enter by one road on to Limestone Ave.
10. Height of apartments.
11. Too many dwellings. The NCA wants the money great, but then give some of the money to the ACT government to support school development and other infrastructures. Also a cramped site near a national institution (The memorial) is not in keeping with the look of CANBERRA. Make the developers use the space like the rest of inner, leafy, larger houses.
12. Excessive traffic congestion on limestone avenue. Overflow of car parking will spill over to the surrounding streets and verges on limestone avenue.
13. See comments above - I strongly object to the size of the project
14. The number of apartments and the height of the buildings (7-8 storeys) (PS, you have a typo in your description, above).
15. The fact it is happening at all
16. Over development on site, no road infrastructure to support massive increase in population and close proximity to the high school and war memorial.
17. As the highest point in the area it would overwhelm and cheapen the entry to the war memorial
18. YOU ARE TAKING ALL OUR GREEN SPACES!!!!
19. Height of buildings, pool, tennis courts, no public space
20. Reduced setback
21. Building height on Limestone Ave.
22. Limited/no access for cycling CHS students.
23. Apartments that block site lines to Mt Ainslie. The barrier fence cutting out the public from the development. Is the barrier fence around the whole development necessary?
24. The height, no. of dwellings, reduced setbacks, change to character of neighbourhood, blocking of sightlines, and loss of open space.
25. The high density of the development, the height of the buildings, the small setbacks, the lack of prominence given to green space.
26. The two apartment buildings are totally out of character for the area.
27. It takes up too much of the block and has no access through it for pedestrians, hikers, tourists and students accessing Campbell High School
28. High rise buildings out of character with the area and too close to Limestone Avenue.

29. That it may change the look of Mt Ainslie and that overtime Mt Ainslie will be developed.
30. The privatisation of this site raises long term planning issues, given the significance for another public use and its potential to be a landmark. Having sold it to a property developer whose primary objective is to maximise profit, I am concerned that valuable sites are being lost for ideological reasons and the level of scrutiny is hampered when the NCA produces a DCP. As DCPs are not part of the normal ACT planning system, and the land lies outside the Parliamentary Triangle but still within a Designated Area, the engagement with major stakeholders continues to be superficial.
31. Having the largest buildings closest to the street frontage is not in the best interest, in my opinion. Their scale is too large for the location and surrounding uses. There are no other developments that will be nearly as tall as these or as prominent. Even if only one storey is removed it would be more fitting and less obtrusive. Access off of Limestone Avenue is the most prominent issue for me. Without a signalised intersection, which also would likely cause issues, there is little opportunity for residents to exit the site at peak times. From personal experience, I would suggest that ingress only to the site be facilitated from limestone.
32. As an active cyclist I could not see how the internal traffic arrangements encourage cycling.
33. The awful forms!
34. High rise apartment towers.
35. All.
36. Height of the buildings and additional traffic.
37. The building is too high. The area has lots of natural beauty. In my view buildings above the tree line in such areas is inconsistent with good planning.
38. Its crassly commercial nature and the resultant disregard for a great city and it's inhabitants.
39. The height, orientation and closeness to Limestone Avenue of the two tower blocks. Residents of the west facing apartments will roast in summer.
40. All of it. It is too tall, too big, too far away from public transport, there is inappropriate infrastructure for traffic volumes, and no assessment on the impact on local schools.
41. Not sure
42. Twin towers fronting Limestone Ave
43. Apartment Building heights
44. There are far too many units in the proposed development. Half of the apartments in C5 still sit empty, why are we building so many more?
45. The height of the towers. A further reduction in the development planning below 40,000 sq m is needed and could be achieved with economy and good design with architecture suited to the site - that is a design than flowed rather than overwhelmed the area.
46. Lack of public consultation. A developer wants to make money by destroying a community facility. The ACT and federal governments do not seem to care about loss of "open space".
47. Inadequate parking. A cursory glance at any recent medium-high development in Canberra will clearly show current requirements for this type of development are

- inadequate. Spill over parking will occur, which will be a particular eye sore as landscaped & setback areas are typically used & damaged. Traffic impacts have been underestimated. Basing accident calculations on historical data is in this instance irrelevant, due to the sites previous use and different traffic patterns. Weaving and "run-running" will become a particular issue on Limestone Av (Northbound), Allambee & Quick St.
48. West facing aspect which will require special consideration in urban design .
 49. I think it could be improved by continuing some aspect of Ainslie Ave up the hill rather than having it peter out to nothing.
 50. Having to plan routes around the bottlenecks that I envisage will be inevitable.
 51. No light rail station
 52. The proposed apartment buildings
 53. Parking and traffic management.
 54. Can I say everything?! A very modest amount of single level townhouses, or a swimming pool *for the school* might be appropriate
 55. As stated above, I would like to request that vehicle AND bike access into Campbell High is provided as part of the development. This is a simple community consideration that could be incorporated.
 56. Above all the size and the sprawl are the problem
 57. Height of buildings Number of dwellings Traffic impact
 58. The fact that is more modern boxes full of flats.
 59. Nothing
 60. Building height, increased traffic congestion during peak hours and negative impact on surrounding residents.

Question 8: Would you like to be contacted once the detailed development plans are submitted to the National Capital Authority for consideration?

The majority of respondents (40 or around 65% of all respondents) requested that they be contacted once detailed development plans are submitted to the NCA for consideration.



Question 9: Thank you for taking time to complete this survey. We welcome any further comments here or email DCP@nca.gov.au.

Thirty answers were received in response to this question however three comments were symbols (for example - . and -) or a single letter and have not been included below. Comments received in response to this question were:

1. Please ensure that there continues to be a safe access route along the base of Mt Ainslie to the back of the school for children traveling to Campbell high from Hackett and Ainslie. This is important because our kids can get to school without having to ride bikes in traffic. At present parents also drop children to school at the old csiro car park next to the basketball courts. It would also be great if car access here could continue as it is much quicker for parents and removes congestion from Limestone ave and the front of the school.
2. The proposal cannot proceed until (someone) sets aside species habitat to replace that lost on this site. Who gets to approve that? This site is zoned Community Facility. Will the public be allowed to object to any re-zoning?
3. Please don't make this your biggest mistake ever. This is Mt Ainslie's future
4. Thanks
5. Please ensure thoroughfare is maintained across the back of Tge school and betweenntge development and Ainslie village for cycling. The alternative (sharing Limestone Ave with cars and trucks) is dangerous, as there are NO bike lanes or even a footpath on the southern side. The existing route from behind the War Memorial is very safe.
6. Thanks for doing a survey. Please actually consider what the community wants.

7. I said no on the last question because community consultation on these developments seems to be a 'jumping through hoops' exercise only - ie so long as a consultation can be ticked off, then concerns don't actually need to be responded to.
8. My children ride from Hackett to Campbell High School using the trails on Mount Ainslie, and they will need a clear path and a safe bridge across the ditch to school. During the construction, care will need to be taken when driving, reversing, and parking trucks etc so as not to block the access trails, and also so there are no accidents involving the very large numbers of children riding to school from Ainslie and Hackett.
9. Stop destroying Canberra with rubbish apartments. There's already an over supply.
10. THREE DAYS LEFT to comment on the development next to Campbell High. I just did the quick survey - it only has about 5 questions. In the last bit I said: A path down from the top of Ainslie to Campbell High school needs to be created once this development starts. Campbell High students need a clear path down from Mt Majura, and a safe bridge across the ditch. In doing the construction care will need to be taken not to park trucks etc blocking the students from the Mt Majura access trails they use to ride to school in large numbers from Ainslie and Hackett.
11. My main concern as a parent who lives in Ainslie and who has three children is that access to Campbell High is maintained from the reserve. A clear and safe bike path to the school from the "back of the houses" track from the reserve is important. I am also concerned that the development doesn't have any adverse impact on the Ainslie Village and that thoroughfare into and out of Ainslie Village is not impeded in anyway for the residents living there.
12. A path down from the top of Ainslie to Campbell High school needs to be created once this development starts, as otherwise large numbers of young Campbell High students on bicycles will be funnelled next to Ainslie Village every morning, which is not ideal. The students need a clear path down from Mt Majura, and a safe bridge across the ditch. Currently it is not ideal, and will get much worse once this site is fenced off and construction starts. In doing the construction care will need to be taken not to park trucks etc blocking the students from the Mt Majura access trails they use to ride to school in large numbers from Ainslie and Hackett.
13. There needs to be some compensation for the damage done to Limestone Ave by construction vehicles to Limestone Ave as a result of this development and the War Memorial developments, and other major developments in the area all happening at the same time. The road will become potholed and corrugated. In parts it already had a 'squishy' feel when you drive on it in a passenger car.
14. The overload occurring with major proposals in the inner North limits the capacity of resident associations and the community council to engage with new proposals. This has become a serious issue because the results of consultation depend on sufficient interest and arguments on various issues that affect the community
15. At the public presentation we were told that traffic access via Ainslie Ave was not possible because the land to the north of the development area was protected nature park. However, we were also advised later in the presentation that Monash Drive is still a gazetted road that would cross the the reserved land and link with the Ainslie Ave traffic lights. If this is the case the question arises as to whether careful and appropriate

- design could utilise the land reserved for Monash Drive to offset land on the lower slope of Section 38 so that a low speed entrance could be constructed from Ainslie Ave to Section via the set back area between the existing Limestone Ave road reserve and the two apartment towers?
16. Thank you for asking for my views.
 17. In general I feel many of the planned building in civic should be no more than 6 stories high to avoid too much density, and to achieve visual elegance. A similar approach has been taken in central Paris.
 18. The NCA should provide its own professional assessment of the design rather than getting the public to do your job.
 19. As a concerned resident of the ACT, the wholesale destruction of the Bush Capital and transformation of the Territory into a jigsaw puzzle of developers speculative ponzi schemes is becoming disturbing. This latest development is too close to the War Memorial and Mt Ainslie and needs to be treated with respect and sensitivity.
 20. I would not support anything higher than 2 stories.
 21. The precinct adjoining Limestone Ave, Campbell High School and the AWM site is more a residential site than one of 6-8 stories. That would replicate what is planned for Constitution Ave, rather than the suburban area which is abuts. Hence single level and up to 3 stories meets my sense of good planning for the future of the area.
 22. I urge you to visit the site; have a picnic, look at the view, listen to the birds. Can you answer the question; When the site was purchased, did the buyer know that this block was zoned community facility, and was not for residences?
 23. The footpath along Limestone Ave is genuinely terrible. A proper double-width bike path linking the city, Braddon, the War Memorial etc. would be very welcome, and this seems like a good opportunity.
 24. Will send written submission via email shortly.
 25. How it got this far is beyond me. There needs to be a corruption investigation for the politicians and actual penalties for shoddy development practices
 26. Please ensure that there is vehicle AND bike access into Campbell High School, similar to the current arrangements.
 27. Both proposed buildings encroach significantly above the permissible height limits (Section 130 by 1.95m and Section 5 by 1.4m) - these are not exactly 'minor' and should should therefore not be permitted (based on the the consultation report it already appears to be a done deal going through the motions of 'consultation').

Attachment B – Submissions received

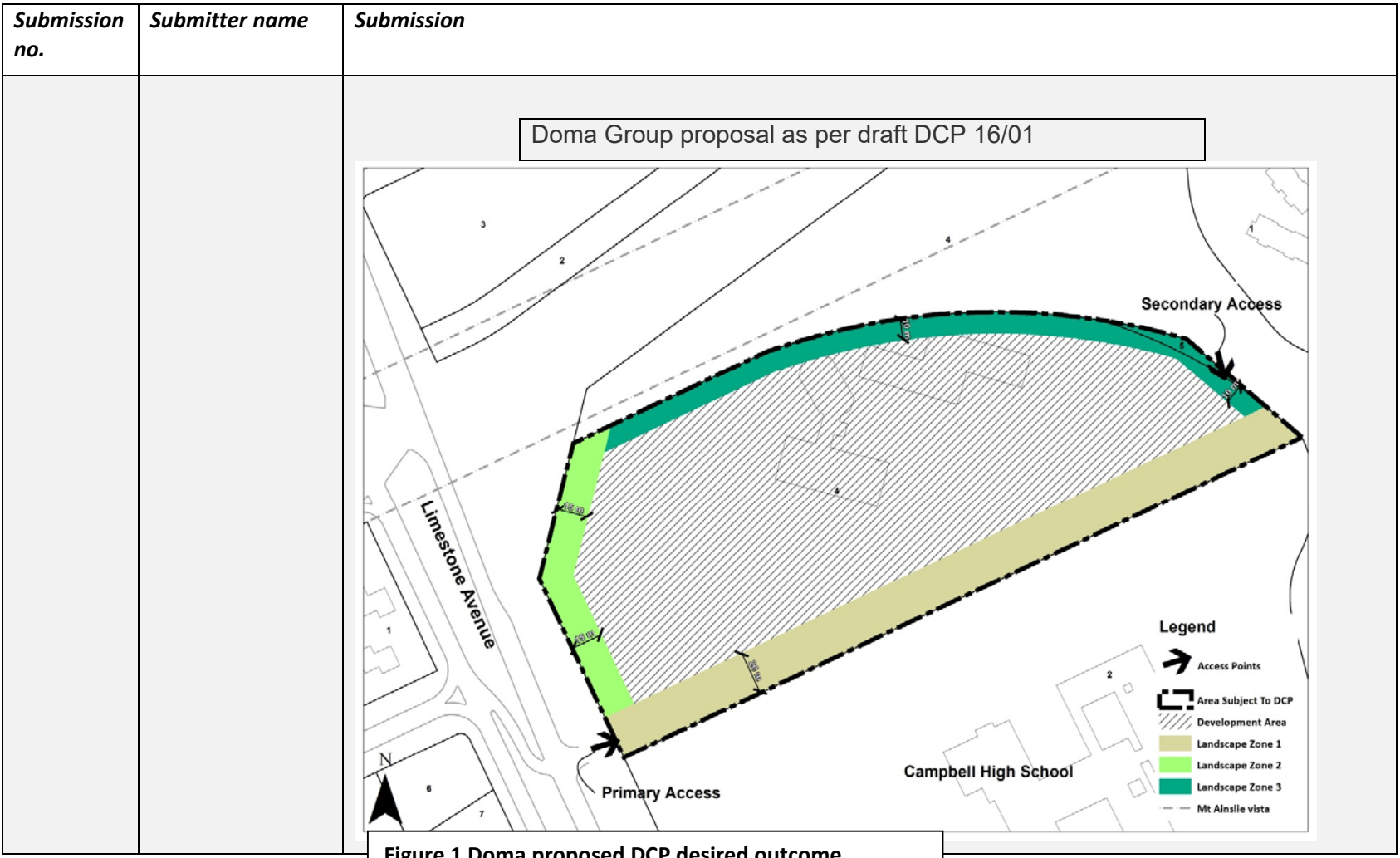
The text provided below largely reflects the full submission received. Personal details or identifying information (where people have requested anonymity) have been removed. Some minor changes have been made (for example, to correct spelling or to provide consistency of terms used in this report).


The NCA seeks an open and transparent consultation process. The name of each person has been published, except where requests for confidentiality were made through submissions or in discussions with officers of the National Capital Authority.


Submission no.	Submitter name	Submission
1	Graham Crompton	<p>The proposal is at odds with the National Capital Authority (NCA) Plan and the site’s integration into its surrounding space and environment</p> <p>Siting, visual and aesthetics</p> <p>The proposed development of the site as far as Limestone Ave without preserving the greenbelt is considered to be too large, invasive and out of keeping with an environment that is integral with the slopes of Mount Ainslie as evidenced by the existing developments of Campbell High School (CHS) and the Australian War Memorial (AWM). It is considered the proposal to be excessive in scope and demonstrably out of character with the National Estate.</p> <p>The Greenbelt from Ainslie Ave to the AWM must be preserved and the original set-back of the building from the now demolished CSIRO buildings and through to CHS and the AWM as per Figure 2</p> <p>Changes to site usage</p> <p>The following are of great concern and should be critically examined by the NCA:</p> <p>It is considered that a high density, mixed residential development will negatively impact the native landscape of Mount Ainslie and the visual aesthetics of this significant site. The NCA should produce its justification/s as to why the radical proposed changes to the site are acceptable and consistent with the NCA’s mandate.</p>

Submission no.	Submitter name	Submission
		<p>The developer Doma should be compelled to reconsider all options for the redevelopment's scale. The NCA should also consider the impact this development has on the surrounding suburbs and not cater to the single desire of the Developer Doma to make a profit.</p> <p>Environmental impacts</p> <p>The site is known for its natural beauty and volcanic boulder outcrops that are sited in clear view at the top of Ainslie Avenue, with the site elevating gradually to form the foothills of Mt Ainslie in the background.</p> <p>Allowing this development by Doma to build down to Limestone Avenue destroys the essence of one of the remnants of natural Canberra (killing off the bush capital) and creates yet another city-suburban environment. The Developer must be forced to reduce the scale and abhorrent visual impact that is abundantly evident from the design proposal.</p> <p>It should be strongly noted that the common practice for such developments is to allow the destruction of unique landscapes such as those inherent on this site such as native grasses, the Golden Sun Moth (an endangered species) and the unique rock formations.</p> <p>The practice of offsetting the unique environmental assets inherent on this site elsewhere or, at worst, photographically in order to comply with the EPBC Act should not be tolerated merely because it's pragmatic and convenient for a rapacious Developer such as Doma to do so.</p> <p>Impacts to local traffic flow</p> <p>The Proposal indicates that the development is to encompass a built area of approximately 40,000m², the vast majority of which will be sold off as residential accommodation. The Proposal indicates traffic in and out of the site will be primarily via a Limestone Avenue outlet with a minor access point being available via the rear of the site that adjoins Ainslie Village and leads into Hayley Street. Traffic flow on Limestone Avenue, Hayley, Quick, Ebdon, Duffy and Chisholm Streets is already extremely heavy at peak commuter time in the morning and afternoon. The inevitable increase of traffic on these suburban streets</p>


Submission no.	Submitter name	Submission
		<p>from a redeveloped site will compound safety and resident amenity, particularly to the high volume of children traversing these streets on their way to either CHS or Ainslie Primary School.</p> <p>As a close resident, it is request that an <u>independently</u> commissioned impact study be undertaken to clearly identify the effects of traffic flow by commuters on and off the site through already over-travelled, dangerous suburban streets.</p> <p>*It is strongly urged that such a study not be at the behest of Doma as there is an inevitable conflict of interest if Doma are required to fund and facilitate such a study.</p> <p>Access to Campbell High School</p> <p>Campbell High School shares a common boundary with the Doma site. This boundary provides a safe and secure drop-off and pick-up route for parents/carers delivering children to the School. Any decrease in this amenity would force parents/carers to access the school via its frontage on Treloar Crescent, which joins Limestone Avenue at a notoriously dangerous intersection.</p> <p>It is requested that access to Campbell High School via the shared boundary with the Doma site is maintained to enable safe and secure delivery of children to the School.</p> <p>Parking on site</p> <p>It is not immediately obvious how car accommodation/parking is to be managed for the Development. The Developer must provide adequate and realistic carparking to accommodate resident and visitor parking within the boundaries of the development. Overflow parking will negatively impact a wide area surrounding this site and it is not acceptable to allow this to occur simply because it negatively impacts the Developer's profit margin.</p> <p>It is requested that any parking proposal submitted by the Developer should be considered by the NCA with great vigour as it is common practice for Developers to provide parking estimates that are, at best, fanciful underestimates.</p>



Submission no.	Submitter name	Submission
		 <p data-bbox="728 1157 1220 1204">Figure 2 Response to DCP proposal</p> <p data-bbox="1310 1101 1646 1236">Maintain building line with Campbell High and in keeping with AWM</p> <p data-bbox="705 1268 1758 1300">Greenbelt required to be maintained to preserve the National Estate- AWM to Ainslie Ave.</p>


Submission no.	Submitter name	Submission
		 <p data-bbox="703 1098 1727 1126">Setback and Greenbelt to be preserved as part of the National Estate- Ainslie Ave- AWM</p>


Submission no.	Submitter name	Submission
		 <p data-bbox="703 1118 1935 1214">Native grassland and Ainslie volcanic outcrop rock formations require preservation being the closest native grasslands to the CBD and need to be managed as unique Canberra landscapes to be preserved and maintained.</p>

Submission no.	Submitter name	Submission
		 <p data-bbox="703 979 936 1007">Native fauna on site</p>
2	Tony Maple	<p data-bbox="703 1031 1872 1098">I attended the public information session on the Concept Plan and revised Development Control Plan (DCP) for Blocks 4 and 5 of Section 38, Campbell.</p> <p data-bbox="703 1118 1845 1185">The session was well run and informative, and I came away with a much better appreciation of the constraints on the site and the developer's concept.</p> <p data-bbox="703 1206 1926 1273">I am pleased that landscape architecture will play a large role in the plan, but have reservations about the vehicular access aspects.</p>

Submission no.	Submitter name	Submission
		<p>However, my chief concern is the impact on an early settlement marker in the form of a prominent rock situated on the higher parts of the site.</p> <p>The site has a longer history than that outlined in the public briefing. The area was originally part of Robert Campbell's Duntroon estate. In the 1880s, Ebenezer Booth erected a building nearby at the intersection of the Queanbeyan-Yass road and the old Scott's Crossing road. (i.e. now near the intersection of Allambee and Limestone Ave). Booth conducted farming operations on the site, and also acted as the postmaster for Canberra. The building was later occupied by the Kinlyside, Murty and McIntosh families who carried on the farming and postmaster functions until the building was demolish in 1926.</p> <p>As the post office, the building had a prominent function in Canberra from around 1880 to 1925 when it served as a communications hub for the district. In addition to the postal functions, telegraph and telephone services were added over time. Because of those vital services, the site was very familiar to the people of Canberra in the late colonial and early Commonwealth periods.</p> <p>Following the selection of Canberra in May 1909 as the site of the Federal capital city, the surveying teams led by Charles Robert Scrivener conducted a series of surveys of a topographical and cadastral nature. Scrivener erected a prominent survey marker on the higher parts of Block 4 of the site and named it 'Murty', probably as a token of recognition for Mrs. Priscilla Murty who had undertaken the post mistress function for nearly 30 years. In the process of carrying out their work, the surveyors selected prominent sites from which they took panographic photographs of the Canberra site. That which they made at the Murty site is found in the Sheaffe papers at the National Library here: https://trove.nla.gov.au/version/254813265</p> <p>You will see the image is labelled as being ' Sheaffe Papers. Photographic panorama titled 'City series from rear of Canberra Post Office, Federal Capital Site'. View is from lower slopes of Mount Ainslie.'. This indicates it was sourced from the records of Percy Lempriere Sheaffe, a prominent surveyor and early character in the foundation of Canberra. See here for background.</p> <p>That Sheaffe panograph with my locational markup is below, together with markup highlighting a prominent rock feature of the Ainslie volcanics type on the site. In my view, the panograph gives one of</p>

Submission no.	Submitter name	Submission
		<p>the best representations of the core area of the Canberra site as it was in 1910, before Griffin and indeed before the Federal Capital Territory had been surveyed. The rock still exists on the site which makes it almost a unique survivor given almost every part of the land surface of central Canberra on both sides of the lake has been extensively modified.</p> <p>That rock was visible in the long indigenous period predating colonial settlement. It was there when colonial settlers stripped the land of trees for sheep grazing and cropping, and it witnessed the comings and goings of people collecting their mail in early Canberra. In September 1915 the funeral cortege of General Sir William Throsby Bridges, commander of the Australian Imperial Force, passed by just below on the old Queanbeyan road as it made its way to his grave at Duntroon. And it has survived to the present day, despite the site being used in recent times for CSIRO purposes. As such it is both an early settlement marker and a silent witness to Canberra's history up to present moment.</p>

Submission no.	Submitter name	Submission
		 <p data-bbox="705 1230 1942 1287">Today the rock is among trees, shrubs and coarse grass on the development site. A close up is provided beneath my signature block. In the picture above the rock can be seen the present context. And I</p>

Submission no.	Submitter name	Submission
		<p>represent the approximate location on the planning picture below. While I have not conducted an exact analysis of the Concept Plan to locate it precisely, it is very close to the northern-most of the two taller buildings near Limestone Avenue.</p>  <p>So in my view, the rock ought to be preserved in its present location. It is distinctive natural marker that has survived to the present day and it features in one of the best images of the Canberra site before the present city was built upon it. It is an almost unique landscape marker that allows people to locate themselves on the surface of pre-Griffin Canberra.</p>

Submission no.	Submitter name	Submission
		I believe it would be a great pity to destroy or move the rock, but I trust that is not the only approach open. DOMA has shown a great regard for landscaping and natural textures in their concept plan. I therefore hope the NCA will require the DOMA Group to propose creative and sympathetic ways of making the rocks a distinctive heritage addition to their development.
3	Benjamin Damyon	<p>As a local resident I am interested in access arrangements for children and locals transitting along/adjacent to the informal road at the north boundary.</p> <p>The plans appear to show that the road access from the development to Hayley st will be maintained.</p> <p>With the volume of traffic likely transitting from due to the development, how will safety of pedestrians be ensured?</p> <p>Ideally, a path with pedestrian road crossing points would ensure the safety of children travelling to & from campbell high and pedestrians in general.</p> <p>I would ask that the development proposal address this concern.</p>
4	William Goff	<ol style="list-style-type: none"> 1. Thank you for the opportunity to comment on the proposed redevelopment of the old CSIRO headquarters site above Campbell High School, offered in a letter from your Chief Planner, Andrew Smith, dated 1 July 2019. The linked materials, especially the minutes of the discussions of the National Capital Design Review Panel (DRP), were very useful in gaining a 'feel' for the yet-to-be-finalised proposal from Doma Group. 2. I am a private citizen currently living in a unit facing Quick Street Ainslie, and therefore overlooking the proposed redevelopment site. I have no formal qualifications in planning or associated fields, but do have an active interest in the quality of our built and natural environments. 3. This submission <u>does not</u> relate to the interface between the development site and my residence. My reading of the DRP minutes indicates to me that issues relating to the townhouse elements of


Submission no.	Submitter name	Submission
		<p>the proposal, which most directly affect residents on my side of the site, are being properly managed by the NCA.</p> <ol style="list-style-type: none"> 4. I would, however, like to raise a couple of issues relating to the proposed apartment blocks facing Limestone Avenue. Of the two issues I outline below, I think the second is the more significant. 5. I note that questions regarding overshadowing of houses on the Western side of Limestone Avenue are already being addressed, but that is a local and hopefully manageable aspect of the proposal. 6. As to my first concern, I observe that, at eight storeys each, the proposed apartment blocks would be, by a very large margin, the tallest structures adjoining the entire length of Limestone Avenue, indeed beyond that into the extensions at either end (Majura Avenue and Fairbairn Avenue). 7. It would be useful to know the rationale or justification for such a radical departure from the existing norm, whether or not such a departure is permitted under current zoning categories. If such a rationale or justification exists it would probably deal with my concern on this point <u>unless</u> approval of the apartments element sets a precedent for future such developments along Limestone Avenue. The avenue, with its wide and tree-filled centre strip, currently provides a peaceful and even elegant touch to the ambience of Canberra's Inner North. 8. The second element of this submission has, I suggest, wider implications. It relates to the positioning of the apartment buildings in relation to Canberra's most famous vista - the formal and symbolic corridor between Parliament House and the Australian War Memorial. 9. When viewed from Parliament House or nearby, the proposed apartment blocks would be less


Submission no.	Submitter name	Submission
		<p>than ten degrees to the left of the War Memorial, and therefore well within the peripheral vision of people . Given their height, especially in relation to surrounding buildings, they therefore have the potential be a significant distraction from the experience of the symbolic corridor for the hundreds of thousands of tourists (and locals) who view it each year.</p> <p>10. At least the old Administrative Buildings at the bottom of Anzac Avenue had the virtue of providing a symmetrical frame for the overall view of the corridor, but the proposed apartments have no such advantage.</p> <p>11. In the context of national significance, I am reminded of the lone skyscraper dominating the middle-distance view from several elevated parts of central Paris. Among those elevated parts are the Fields of Mars, from where millions of visitors to the Eiffel Tower (including myself) have been shocked by this grotesque departure from the overall dignified and understated visual impact of the architecture of that wonderful city. Of course, the analogy with the proposed Limestone Avenue apartment blocks is far from perfect, but it does provide food for thought. The fact that the apartments are a private sector development with no relevance whatsoever to the public importance of the vista is one similarity that could be considered.</p> <p>12. I submit that at the very least, the colour scheme of the proposed apartment blocks should be closely consistent with the neutral earth-oriented colours of the corridor - and the War Memorial itself - blending also with the similarly neutral and green-tinged themes of the suburb of Reid below the site.</p> <p>13. Preferably, and in addition to the colour consideration, I submit that the height of the apartments be reduced by at least two storeys, so that their potential to derogate from people's experience of</p>


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		<p>the nationally recognised corridor is reduced to a more acceptable level.</p> <p>14. I was unable to attend your information session on 10 July 2019, so I hope the foregoing thoughts do not unduly duplicate any issues raised there. Thank you again for the opportunity to comment.</p>
5	Jack Kershaw	<p>I think my earlier comments on the subject site's development were about preserving the former CSIRO buildings etc. Of course, sadly, they're now history.</p> <p>I also may have also mentioned the fact that the Commonwealth Department of Infrastructure, in its detailed plan for an east-coast inter-city high speed rail system, after careful examination of several alternatives including at the airport, recommended that Canberra's (terminus-style) station be in Civic underneath lower Ainslie Avenue. Access to the station is via a tunnel under Mt Ainslie and under Ainslie Avenue itself, down its length. This has many advantages, i.e. speed, safety, quietness, no land acquisition required, and so on. I may have also mentioned a concept of a better "National Capital Arrival Experience" station, which could see the above route's station's glass-walled arrival concourse elevated above the intersection of Ainslie Avenue and Limestone Avenue, affording great views of the city, the Central National Area, and beyond. The rail route is not on the subject development's site, but is quite near it, and any impacts, would need to be considered. See attached PDF above.</p> <p>Pressure has been applied by the owners of Canberra Airport to site the VFT station at the airport. However, as mentioned, the Department has not favoured that location. In any case transport dynamics are rapidly changing with the development and construction of Sydney's new 24 hour airport at Badgerys Creek underway, perhaps usurping some related functions that the local airport saw itself taking up in connection with the VFT.</p> <p>The city centre would clearly benefit greatly (mostly) from the VFT station being there, and, in any case, light rail is planned to connect Civic to the airport.</p>


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		<p>The VFT would be an ideal infrastructure project right now, with interest rates at an all-time low, and the Reserve Bank urging spending on such projects - and Canberra-Sydney is the recommended first stage of the overall Brisbane-Melbourne system.</p> <p>There would clearly be mutually beneficial synergies between the subject proposed development, and a HSR station located and designed as described above, and illustrated in the PDF attachment.</p> <p>On the current Concept Plan and revised Development Control Plan.</p> <p>Clearly, a lot of good work has gone into the analysis of the site including its micro and macro contexts etc, and of course, into the design of the proposed development. If anything, perhaps the site is overdeveloped, especially in relation to the level of amenity that purchasers may expect in a prestige development on such a nationally significant site.</p> <p>However, my main comment relates to massing, and the placing of buildings of varying heights on the site.</p> <p>I believe it would be beneficial for the city, the national capital, the local environment, and terms of urban design; as well as for the quality of the development itself, if, in general terms, the group siting of the high-rise and low-rise buildings was reversed.</p> <p>That would see the high rise structures located on the higher ground, approximately where the former main CSIRO buildings were, and the lower-rise building located towards, and fronting Limestone Avenue, and elsewhere.</p> <p>This concept of taller buildings on higher ground has historical roots in striking places like Italian hill towns, and is enhanced by the taller buildings being of varying heights (some could be even taller, and hence slenderer, than proposed in the subject Concept/Control Plans) and with varying plan footprints as well.</p> <p>This arrangement has the additional advantage of the taller buildings not blocking the outlooks of the lower-rise ones, and site's general orientation is such that overshadowing could be minimised or avoided.</p> <p>And of course, the outlooks from the higher rise building would be significantly enhanced and protected.</p>

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6	Hazel Moir	<p>This is yet another example of the complete failure of planning regulators to preserve Canberra's unique attractiveness as the "bush capital", These concrete towers m which seem to have no architectural merit, will dominate the landscape, blocking views of Mt Ainslie and providing instead more views of concrete towers. Between them the NCDC and the ACT government seem determined to ruin Canberra = wherever one turns there is a high-rise tower blocking previous views of trees and hills.</p> <p>Canberra has a narrow economic base and tourism is important. Why do we seem hell-bent on ruining our unique selling point - the bush capital?</p> <p>The proposed development is entirely unsympathetic to this iconic site - right next to the War memorial.</p> <p>There is little public transport in the area and the development will add pressure to the already over-stressed road system.</p> <p>Please step back and exercise some vision - the development needs to be far lower and sit better within the unique site.</p>
7	Michael Dundas	<p>Thank you for the opportunity to comment on the proposed development. In keeping with the ascetics of the area surrounding the Mount Ainslie I strongly object to the height of the development proposals for the construction of the apartment blocks. It is totally not in keeping with the present architecture and the beauty of the surrounds.</p>
8	Penleigh Boyd	<p>This submission objects to the proposed Concept Plan and Revised Development Control Plan for development of Blocks 4 and 5 Section 38 Campbell on the basis of:</p> <ol style="list-style-type: none"> 1. Unimaginative site planning and layout 2. Poor massing of the built elements 3. Poor consideration of urban planning imperatives on this important site 4. Poor environmental and solar aspects to the layout of the buildings

Submission no.	Submitter name	Submission
		 <p><i>Buildings layout on site, as supplied</i></p> <p>1. UNIMAGINATIVE SITE PLANNING AND LAYOUT</p> <p>This hillside site, on the foothills of Mount Ainslie, gives the opportunity for wonderful vistas towards the distant Brindabella mountain range to the south-west of Canberra. In addition, the predominant site</p>

Submission no.	Submitter name	Submission
		<p>contours for the Limestone Avenue part of the site run in a south-east to north-west direction (approximately at 45 degrees to Limestone Avenue).</p> <p>Common sense and good site planning would take these natural site attributes as a starting point. Instead, the proposed site plan has buildings arranged in an unimaginative, lock-step grid of “army barracks” staring across small, often vehicular trafficked, courts at each other.</p> <p>The only buildings to recognise the inherent contours of the site are the two high rise towers adjacent to Limestone Avenue but here the towers run contrary to the contours with the long dimension cutting into the hillside..</p>  <p><i>Site Survey, as supplied [Note superior orientation of buildings originally on this site]</i></p> <p>The whole layout could be far better planned in a manner best suited to the natural attributes of the site.</p> <p>2. POOR MASSING OF THE BUILT ELEMENTS</p>

Submission no.	Submitter name	Submission
		<p data-bbox="703 327 1937 459">The form of the site, on the foothills of Mount Ainslie, has a steep slope up from Limestone Avenue at the south-west rising to a plateau about half way towards the Mount Ainslie mountain backdrop. The original CSIRO building sat on the crown of the slope looking fully integrated with its hillside setting. At six stories the top of that building came within the “RL 617 rule” and Mount Ainslie towered behind.</p>  <p data-bbox="703 932 1688 959"><i>Siting of the original CSIRO Building on the crown of the foothill (base RL 597 approx.)</i></p> <p data-bbox="703 983 1937 1150">The Proposed Concept Plan has the building massing completely at odds with the site’s attributes. It is all “arse-about”. The low three-storey buildings should be down at the Limestone Avenue end of the site and the taller buildings should be up near the crown of the site. Such a build-up of massed form leads the eye naturally to the backdrop of Mount Ainslie with its summit high above the site at RL 843 metres above sea level.</p> <p data-bbox="703 1174 1937 1273">Furthermore, this more logical massing gives far better outlook from all the buildings, just as grandstand seating does. Why the developer has not taken this approach is a complete mystery as such a course of action would also resolves other problems with the design (refer Objection item 3 below).</p>

Submission no.	Submitter name	Submission
		<p data-bbox="701 328 1753 352">3. POOR CONSIDERATION OF URBAN PLANNING IMPERATIVES ON THIS IMPORTANT SITE</p> <p data-bbox="701 379 1921 440">This significant site, very close to Civic, borders Limestone Avenue on that avenue’s major approach from Civic, and the northern suburbs, to the Australian War Memorial just 250 metres away (as shown below):</p>  <p data-bbox="701 1027 1738 1054"><i>Limestone Avenue, adjacent to DOMA block, looking east to the Australian War Memorial</i></p> <p data-bbox="701 1078 1912 1246">Limestone Avenue is a grand four-lane boulevard and is presently a refined and fitting approach towards the War Memorial. To the south of the site, on the other side of Limestone Avenue, is the heritagised suburb of Reid with its historic 1920s and 1930s single storey houses. The urban built form, including nearby Campbell High School, is intentionally low in scale so as not to interfere with the significance and dignity of the Australian War Memorial just coming into view.</p>

Submission no.	Submitter name	Submission
		<p>The DOMA concept plan, as submitted for comment, has two 24 metre high, eight-storey tower blocks set a mere 15 metres back from the Limestone Avenue boundary. It is worth noting that the adjacent road level here is RL 581 and the roof level of the tower blocks is to be RL 614 resulting in an effective building height of 33 metres (equivalent to an 11 storey building) above Limestone Avenue.</p> <p>Not only will the tower blocks overshadow Limestone Avenue for much of the day but their hulking presence will completely overpower and unbalance the current deliberately low scale built approach to the War Memorial. Furthermore the urban design incongruity with the single storey historic houses on the other side of the road will simply look absurd.</p> <p>The NCA must insist on appropriate, high quality, world best standard urban planning for this important site.</p> <p>As stated in item 2 above, the two 24 metre high towers should be relocated to the crown of the hill where, reduced to six storeys high, they will come within the “RL 617 rule”.</p> <p>Some of the lower buildings may be allowed, by the NCA, to rise to four storeys to compensate. The proposed three storey townhouses should then be located down at the Limestone Avenue end of the site where their massing will be far more sympathetic to the site’s significant Limestone Avenue frontage.</p> <p>4. POOR ENVIRONMENTAL AND SOLAR ASPECTS TO THE LAYOUT OF THE BUILDINGS</p> <p>Further to comments made in objection Items 1 and 2 above, not only does the layout of buildings miss the opportunity of maximising views from the site, but the solar aspect of most of the proposed residences is also very poor.</p>

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		 <p data-bbox="705 1093 1937 1228">The tower blocks, rectangular in plan, have their short ends facing north and their long facades facing east or west. East facing apartments will get only morning sun (and no distant views) and west facing apartments will get unwanted scorching summer afternoon sun. Better elementary site planning would make for much improved amenity and far lower energy use for residences on this site.</p>

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		<p>The National Capital Authority should demand better, world class urban planning for Canberra, especially on this very significant site close to Civic and the Australian War Memorial.</p> <p>Thousands of Canberrans and visitors to Canberra pass this site every day. It is an important place in Canberra's urban fabric.</p> <p>Furthermore the Blocks 4 and 5 Section 38 Campbell will become home to hundreds of people who deserve a better amenity and environmental outcome than what is presented here.</p>
9	Friends of Grasslands	<p>Friends of Grasslands (FOG) is a community group dedicated to the conservation of natural temperate grassy ecosystems in south-eastern Australia. FOG advocates, educates and advises on matters to do with the conservation of grassy ecosystems, and carries out surveys and other on-ground work. FOG is based in Canberra and its members include professional scientists, landowners, land managers and interested members of the public.</p> <p>Thank you for the opportunity to meet with NCA staff to discuss the proposed plans.</p> <p>FOG understands that there are no identified conservation values within the development area. However, as there may be considerable inadvertent damage to the critically endangered Natural Temperate Grassland and Yellow Box – Blakely's Red Gum Woodland adjacent we recommend the following actions:</p> <ol style="list-style-type: none"> 1. Cat containment: we urge that this be implemented from inception. All new suburbs developed by ACT Government are required to ensure cat containment. This development is adjacent to Mt Ainslie Nature Reserve. 2. Fencing of the entire grassland and woodland area to the north of the development during the construction period; a gate for access for local residents at each end of the current pathway is acceptable. 3. Landscaping within the development area to include no species that may become invasive and spread beyond the development area. Where possible local endemic species should be included to enhance habitat.

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		<p>4. If any native trees are to be removed from the development site, the logs from these trees to be placed in the woodland adjacent or within Mt Ainslie Nature Reserve to enhance habitat.</p> <p>5. That the developers work with relevant managers and community groups to develop a program to ensure long-term protection of the area of grassland and Golden Sun Moth habitat. This may include preparation of educational material to inform future residents, including development of wording for signage and possible publication of information about the threatened habitat to the north of the site. A process similar to that applied at Forde in Gungahlin may be considered, in which a partnership between developers, conservation and other community groups and other stakeholders was established.</p>
10	Walter Burley Griffin Society	<p>The Walter Burley Griffin Society is currently experiencing a few other priority demands and regrets missing the 10 July information session. I am impressed however by the publicity and the comprehensive basic studies and documentation provided on NCA's website.</p> <p>We have also been enabled to respond by virtue of the numerous discussions on this subject raised among our members and network of other interested citizens.</p> <p>The redevelopment of the former CSIRO Headquarters site is but the latest of a series of developments that impact on Griffin's legacy and heritage imbedded in the chosen plan, structure, landscape setting, national symbolism and geometry of Central Canberra. They are generally changes from local to national land uses and affect Griffin's major axes, radials, avenues and landscape vistas. Some of these impacts are already evident whilst others are prospective and, in our view, generally degrade these great assets.</p> <p>The corollary to this loss of heritage, there is a steady contraction of land available for or even designated as national capital uses, present and future. This trend is just being allowed to happen without the constraints of frameworks, boundaries, master plans or future national scenarios. The Development Control Plan for Section 38 thus lacked binding national asset assessment or contingencies.</p> <p>By comparison the USA national capital Washington has a Core Framework Plan, a Comprehensive Plan of Federal Elements and a Memorials and Museums Master Plan, all projected into future potential needs.</p>

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		<p>Examples of this creeping appropriation of national land in Canberra for other purposes, local residential, commercial and educational, are Anzac Parade, City Hill, West Basin, Constitution Avenue, University Avenue, Ainslie Avenue, Northbourne Avenue, Edinburgh Avenue, Canberra Avenue, Adelaide Avenue, Melbourne Avenue and Majura Avenue. In each instance the many and various forms of degradation could have been prevented by planning and lease management means.</p> <p>In the case of Section 38 Blocks 4 & 5 Campbell, the site is so extensive and elevated as to be effectively the terminus of Ainslie Avenue, already so degraded, and will with its building mass distract from Mt Ainslie. I found the critique of the National Capital Design Review Panel strong on architectural aspects but quite deficient with respect to the landscape architecture and all round vistas, that is towards the site and along Limestone and Ainslie Avenues. The mass of 241 dwellings, the spread of the estate and the pronounced elevation amount to unsuitable and excessive development.</p> <p>It is not too late to scale back the spread, height and mass of this project in order to harmonise, rather than clash, with the National Capital Plan and Griffin Plan heritage.</p>
11	Julie Doyle	<p>The following is written in support of comments which have been prepared by various residents regarding the above proposals and the DOMA Planning Report.</p> <p>The concept plan for terrace dwelling is acceptable but the proposal to construct two eight-storey apartment blocks on the site is totally out of keeping with the surrounding area.</p> <p>Since DCP 16/01 was approved in 2016 the ACT Government has developed the ACT PS 2018 (PS) which was developed following a lengthy period of consultation with all relevant stakeholders and reflected many views expressed at during consultation.</p> <p>The PS clearly identifies sites suitable for Urban Intensification Localities which are depicted in purple on the plans shown on pages 7 and 40 of the PS. Areas identified as suitable for Urban Intensification are consistently described in the PS as the city centre, town and group centres, and transit corridors which are areas of high accessibility.</p>

Submission no.	Submitter name	Submission
		<p>The proposal to construct two eight storey apartment blocks on Limestone Avenue appears to be inconsistent with the PS.</p> <p>Many professional stakeholders and community groups devoted a great deal of time and effort to contribute to the development of the PS.</p> <p>It is discouraging to find that the NCA is now considering approving works that appear to be inconsistent with it on a significant site.</p> <p>While the National Capital Plan prevails over the Territory Plan and the NCA is not bound by the PS, in this particular case the Planning Report states that the land will be ceded to the Territory after the works are completed and the land will then be treated by the Territory as if it was zoned RZ5.</p> <p>The RZ5 zoning is the highest density residential zoning in the Territory. The maximum height for an RZ5 building is 21.5 metres. However, the proposed eight-storey buildings may potentially be constructed to a height which is non-compliant with the Territory Plan prior to it being handed over to the Territory. It is not clear from the information currently provided if building to RL617 will permit construction exceeding 21.5 metres on the site.</p> <p>At page 54 of the Planning Report it states that in response to a query by the Minister about whether any changes to the Territory Plan would be required as part of the amended DCP the response was “As the Minister would be aware, the National Capital Plan overrides the Territory Plan so if the development complies with the NCP there are no issues.”</p> <p>In circumstances where the site is going to be developed for residential use and ceded to the Territory, the NCA should ensure that the maximum height limitations contained in the Territory Plan are complied with.</p> <p>The NCA should also reconsider the provisions of DCP 16/01 to ensure they are consistent both with the 2018 PS and the zoning of the residential suburbs surrounding the site.</p> <p>Under the current provisions of DCP 16/01 a written assessment against the requirements of the ACT PS is required. The proposal to amend the DCP includes an amendment to push that requirement back to “prior</p>

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		<p>to approval of the works” rather than the current requirement for providing it “prior to approval of the concept plan”.</p> <p>If the NCA is not prepared to review the DCP to make sure it is consistent with the PS, the requirement in the current DCP to provide the written assessment against the requirements of the PS should remain in place. That written assessment should then be made publicly available as part of the public consultation process.¹</p> <p>As mentioned above, the Urban Intensification Localities are depicted in purple on the map on page 7 of the PS.</p> <p>Limestone Avenue is not within a purple zone.</p> <p>Consistent with the PS, construction of higher rise apartment blocks is proceeding along Northbourne Avenue, Cooyong Street and Constitution Avenue, (which are within a purple zone), however, this development is being approved so that the taller buildings are facing the major transit roads, and shorter buildings are being constructed on the interface between the new developments and the residential suburbs. This structuring of the shorter buildings towards the suburban interface demonstrates that care is being taken through the urban intensification process to maintain the amenity and character of the adjoining suburbs.</p> <p>At page 42 of the PS it states that urban intensification opportunities will be investigated having regard to locational criteria which includes being within 1000 metres of the city centre. The Planning Report claims that the proposed development on Limestone Avenue is approximately 1 kilometre from the City centre. It appears from the documents provided for public consultation that the buildings will be located slightly further than 1 kilometre from the City centre.</p>

¹ That written assessment should include information about how many metres above ground level each building will be. That information is not included in the Planning Report as far as I could see. Providing information such as RL 617 to describe the height of a building is not useful for public consultation.

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		<p>The 1km distance from Civic would not automatically make it a suitable site for construction of eight-storey apartment buildings under the provisions of the PS.</p> <p>The PS also states at page 42 that opportunities for infill development will be considered by neighbourhood characteristics.</p> <p>This proposed development is in the middle of two low rise residential suburbs. The residential areas in Ainslie and Reid surrounding the site are zoned RZ1 and the residential areas along Ainslie Avenue are zoned RZ4.</p> <p>The maximum number of storeys for a home in RZ1 is two and the maximum height for homes in RZ4 is 12.5 metres. The construction of two eight-storey apartment blocks in the middle of these suburbs will be out of character.</p> <p>Should the proposal be altered to replace the two eight-storey apartment blocks with more terrace houses, that would be more appropriate to the location and consistent with the Territory legislation which will ultimately govern the site.</p> <p><u>Proposed amendments to DCP 16/01</u></p> <p>The Planning Report at pages 22 to 51 does not assess the proposed development against DCP 16/01. Instead it assesses the proposed development against the proposed amendments to DCP 16/01 which are referred to as DCP 19/XX.</p> <p>For example, at page 27 the proposed development is assessed against a provision to “Provide allowance for buildings with an appropriate scale along Limestone Avenue” and it is claimed that the two apartment buildings of eight storeys are consistent with that provision.</p> <p>DCP16/01 currently states “Provide allowance for buildings with an appropriate scale in relation to adjacent residential development and community facilities along Limestone Avenue”. The adjacent residential development and community facilities are two-storey buildings. The construction of two eight-</p>

Submission no.	Submitter name	Submission
		<p>storey apartment blocks is not in appropriate scale to the surrounding residential development and community facilities.</p> <p>The proposal to exclude the words “in relation to adjacent residential development and community facilities” from DCP 16/01 may be construed as a concession that the construction of the two apartment buildings is not in appropriate scale in relation to adjacent residential development and community facilities.</p> <p>Similarly, in Part 5 of DCP 16/01 it is proposed to change the requirement to “demonstrate that the proposed height of the buildings shall not dominate the landscape setting of the locality” to “demonstrate that the height of the buildings shall minimise overshadowing to surrounding developments and the landscape setting”.</p> <p>Again, this could be construed as a concession that the construction of two eight-storey apartment blocks may in fact dominate the landscape setting and that the proposal may not be compliant with the current DCP.</p> <p>It would appear that the proposed apartment buildings will be out of character with and dominate the surrounding suburban areas creating an incongruous vista along Limestone Avenue and from Mount Ainslie.</p> <p>The proposed changes to DCP 16/01 referred to above are inconsistent.</p> <p>In addition:</p> <ul style="list-style-type: none"> • In Part 2 it is proposed to include the words <i>“The development anticipated in this DCP is akin to development that is currently permitted in the Territory Plan RZ5 high density residential zone which is to apply to the site once the land is transferred to Territory land.”</i> - However, there does not appear to be sufficient detail provided to date about the potential height above ground level of the two apartment buildings to know if the buildings will be compliant with RZ5 requirements. Further, the RZ5 zoning permits buildings to 21.5 metres in height only where that is consistent with the desired character of the area.

Submission no.	Submitter name	Submission
		<ul style="list-style-type: none"> • In Part 4 the inclusion of the words <i>“Building heights in each block shall be no higher than the built envelope depicted in Figure 2.”</i> The building height required in the DCP should be consistent with RZ5 requirements. It is not clear from the information currently provided for public consultation whether building to RL 617 will limit the building height to the RZ5 limitation of 21.5 metres. • In Part 4 the replacement of the words <i>“not cast a”</i> with the words <i>“minimize”</i>. • In Part 4 the removal of the words <i>“All plant and equipment are to be totally concealed from view from Mount Ainslie and Limestone Avenue.”</i> The vista from Mt Ainslie in particular is an iconic Canberra vista and should be protected. • In Part 5 the replacement of the word <i>“maximise”</i> with the word <i>“appropriate”</i>. • In Part 5 the replacement of the words <i>“take into account”</i> with the word <i>“consider”</i>. • In Part 5 the removal of the words <i>“retain existing trees where possible.”</i> • In Part 5 under the heading <i>“Supporting Reports and Studies”</i> the proposal to require completed reports prior to approval of the works plan instead of prior to approval of the concept plan. It is important to the community that all the relevant reports are completed and available for consideration prior to the concept plan being approved and the works proposal proceeding. • In Part 5 the removal of the requirement to address <i>“the existing storm water problems experienced on the Limestone Avenue frontage of the site preferably utilising onsite methods.”</i> • In Part 5 the removal of the requirement to provide a heritage assessment and heritage impact statement and to provide them to the ACT Heritage Council for consideration. <p><u>Public Consultation and Traffic Congestion</u></p> <p>The Planning Report doesn’t include any comments relating to consultation with the Campbell Community Association. Two Doma representatives did attend a public meeting in Campbell organised by the CCA. They provided a power point presentation demonstrating how the proposal had been reduced from the initial 600 and something dwellings to 200 and something dwellings.</p>

Submission no.	Submitter name	Submission
		<p>Many residents present expressed opinions and concerns regarding both public safety and the volume of traffic that would be generated along Limestone Avenue which is congested during peak hours. Those opinions and concerns have not been included in the Planning Report.</p> <p>In Summary:</p> <ul style="list-style-type: none"> • The proposal to construct two eight-storey apartment blocks on the site should not be approved because: • The proposed eight storey apartments are not in appropriate scale in relation to residential development and community facilities in the nearby suburbs including with buildings along Limestone Avenue and Ainslie Avenue. • Insufficient detail has been provided to date to determine if the apartment buildings will be compliant with the Territory Plan in circumstances where it is proposed to cede the site to the Territory on completion of construction. • The proposal to construct two eight storey apartment blocks on Limestone Avenue appears to be inconsistent with the PS. • Traffic issues raised by residents have not been sufficiently addressed.
12	Thomas Basan	<p>The proposal to construct two eight-storey apartment blocks on the site should not be approved because:</p> <ul style="list-style-type: none"> • The proposed eight storey apartments are not in appropriate scale in relation to residential development and community facilities in the nearby suburbs including with buildings along Limestone Avenue and Ainslie Avenue. • Insufficient detail has been provided to date to determine if the apartment buildings will be compliant with the Territory Plan in circumstances where it is proposed to cede the site to the Territory on completion of construction. • The proposal to construct two eight storey apartment blocks on Limestone Avenue appears to be inconsistent with the Planning Strategy.

Submission no.	Submitter name	Submission
		<ul style="list-style-type: none"> • Traffic issues raised by residents have not been sufficiently addressed. <p>As a resident of Campbell I am writing to you to provide some comments on the proposed Concept Plan for Blocks 4 & 5, Section 38, Campbell (the site) and the proposed changes to DCP 16/01.</p> <p>I have no objection to the concept plan for the terrace houses. However, I have an objection to the plan to construct two eight-storey apartment blocks on the site.</p> <p>Since the DCP 16/01 was approved in 2016 the ACT Government has developed the ACT Planning Strategy 2018 (the Planning Strategy). The Planning Strategy was developed following a lengthy period of consultation with relevant stakeholders in the ACT and was shaped by the many views expressed during consultation.</p> <p>The Planning Strategy clearly identifies sites suitable as 'Urban Intensification Localities' which are depicted in purple on the plans shown on pages 7 and 40 of the Planning Strategy. Areas identified as suitable for 'Urban Intensification' are consistently described in the Planning Strategy as the city centre, town and group centres, and transit corridors which are areas of high accessibility.</p> <p>The proposal to construct two eight storey apartment blocks on Limestone Avenue is inconsistent with the Planning Strategy.</p> <p>Many professional stakeholders and community groups devoted a great deal of time and effort to contribute to the development of the Planning Strategy.</p> <p>It is therefore disheartening to find that the NCA is considering approving works that are inconsistent with the planning strategy and on a significant site.</p>

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		<p>While the NCA Plan prevails over the Territory Plan and the NCA is not bound by the Planning Strategy, in this particular case the Planning Report states that the land will be ceded to the Territory after the works are completed and the land will then be treated by the Territory as if it was zoned RZ5.</p> <p>The RZ5 zoning is the highest density residential zoning in the Territory. The maximum height for an RZ5 building is 21.5 metres. However, the proposed eight-storey buildings may potentially be constructed to a height which is non-compliant with the Territory Plan prior to it being handed over to the Territory. It is not clear from the information currently provided if building to RL617 will permit construction exceeding 21.5 metres on the site.</p> <p>At page 54 of the Planning Report it states that in response to a query by the Minister about whether any changes to the Territory Plan would be required as part of the amended DCP the response was “As the Minister would be aware, the National Capital Plan overrides the Territory Plan so if the development complies with the NCP there are no issues.”</p> <p>In circumstances where the site is going to be developed for residential use and ceded to the Territory, the NCA should ensure that the maximum height limitations contained in the Territory Plan are complied with. The NCA should also reconsider the provisions of DCP 16/01 to ensure they are consistent both with the 2018 Planning Strategy and the zoning of the residential suburbs surrounding the site.</p> <p>Under the current provisions of DCP 16/01 a written assessment against the requirements of the ACT Planning Strategy is required. The proposal to amend the DCP includes an amendment to push that requirement back to “prior to approval of the works” rather than the current requirement for providing it “prior to approval of the concept plan”.</p> <p>If the NCA is not prepared to review the DCP to make sure it is consistent with the Planning Strategy, the requirement in the current DCP to provide the written assessment against the requirements of the</p>

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		<p>Planning Strategy should remain in place. That written assessment should then be made publicly available as part of the public consultation process.²</p> <p>As stated above, the Urban Intensification Localities are depicted in purple on the map on page 7 of the Planning Strategy. Put simply, Limestone Ave is not within a purple zone.</p> <p>Consistently with the Planning Strategy, construction of higher rise apartment blocks is proceeding along Northbourne Avenue, Cooyong Street and Constitution Avenue, (which are within a purple zone), however, this development is being approved so that the taller buildings are facing the major transit roads, and shorter buildings are being constructed on the interface between the new developments and the residential suburbs. This structuring of the shorter buildings towards the suburban interface demonstrates that care is being taken through the urban intensification process to maintain the amenity and character of the adjoining suburbs.</p> <p>At page 42 of the Planning Strategy it states that urban intensification opportunities will be investigated having regard to locational criteria which includes being within 1000 metres of the city centre. The Planning Report claims that the proposed development on Limestone Avenue is approximately 1 kilometre from the City centre. It appears from the documents provided for public consultation that the buildings will be located slightly further than 1 kilometre from the City centre.</p> <p>However, even if the proposed development was within 1000 metres of the city centre that would not automatically make it a suitable site for construction of eight-storey apartment buildings under the provisions of the Planning Strategy.</p>

² That written assessment should include information about how many metres above ground level each building will be. That information is not included in the Planning Report as far as I could see. Providing information such as RL 617 to describe the height of a building is not useful for public consultation.

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		<p>The Planning Strategy also states at page 42 that opportunities for infill development will be considered by neighbourhood characteristics.</p> <p>This proposed development is in the middle of two low rise residential suburbs. The residential areas in Ainslie and Reid surrounding the site are zoned RZ1 and the residential areas along Ainslie Avenue are zoned RZ4. The maximum number of storeys for a home in RZ1 is two and the maximum height for homes in RZ4 is 12.5 metres. The construction of two eight-storey apartment blocks in the middle of these suburbs will be out of character.</p> <p>Should the proposal be altered to replace the two eight-storey apartment blocks with more terrace houses, that would be more appropriate to the location and consistent with the Territory legislation which will ultimately govern the site.</p> <p>Additional Comments</p> <p>Proposed amendments to DCP 16/01</p> <p>The Planning Report at pages 22 to 51 does not assess the proposed development against DCP 16/01. Instead it assesses the proposed development against the proposed amendments to DCP 16/01 which are referred to as DCP 19/XX. Eg, at page 27 the proposed development is assessed against a provision to “Provide allowance for buildings with an appropriate scale along Limestone Avenue” and it is claimed that the two apartment buildings of eight storeys are consistent with that provision.</p> <p>DCP16/01 currently states “Provide allowance for buildings with an appropriate scale in relation to adjacent residential development and community facilities along Limestone Avenue”. The adjacent residential development and community facilities are two-storey buildings. The construction of two eight-storey apartment blocks is not in appropriate scale to the surrounding residential development and community facilities.</p>

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		<p>The proposal to exclude the words “in relation to adjacent residential development and community facilities” from DCP 16/01 may be construed as a concession that the construction of the two apartment buildings is not in appropriate scale in relation to adjacent residential development and community facilities.</p> <p>Similarly, in Part 5 of DCP 16/01 it is proposed to change the requirement to “demonstrate that the proposed height of the buildings shall not dominate the landscape setting of the locality” to “demonstrate that the height of the buildings shall minimise overshadowing to surrounding developments and the landscape setting”. Again, this could be construed as a concession that the construction of two eight-storey apartment blocks may in fact dominate the landscape setting and that the proposal may not be compliant with the current DCP.</p> <p>I submit the proposed apartment buildings will be out of character with and dominate the surrounding suburban areas and will create an incongruous vista along Limestone Avenue and from Mount Ainslie.</p> <p>Grounds for Objection</p> <p>I object to the proposed changes to DCP 16/01 for the reasons indicated above.</p> <p>I also object to the following further proposed amendments to DCP 16/01:</p> <ul style="list-style-type: none"> • In Part 2 it is proposed to include the words <i>“The development anticipated in this DCP is akin to development that is currently permitted in the Territory Plan RZ5 high density residential zone which is to apply to the site once the land is transferred to Territory land.”</i> - However, there does not appear to be sufficient detail provided to date about the potential height above ground level of the two apartment buildings to know if the buildings will be compliant with RZ5 requirements. Further, the RZ5 zoning permits buildings to 21.5 metres in height only where that is consistent with the desired character of the area.

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		<ul style="list-style-type: none"> • In Part 4 the inclusion of the words <i>“Building heights in each block shall be no higher than the built envelope depicted in Figure 2.”</i> The building height required in the DCP should be consistent with RZ5 requirements. It is not clear from the information currently provided for public consultation whether building to RL 617 will limit the building height to the RZ5 limitation of 21.5 metres. • In Part 4 the replacement of the words “not cast a” with the words “minimize”. • In Part 4 the removal of the words <i>“All plant and equipment are to be totally concealed from view from Mount Ainslie and Limestone Avenue.”</i> The vista from Mt Ainslie in particular is an iconic Canberra vista and should be protected. • In Part 5 the replacement of the word “maximise” with the word “appropriate”. • In Part 5 the replacement of the words “take into account” with the word “consider”. • In Part 5 the removal of the words “retain existing trees where possible.” • In Part 5 under the heading “Supporting Reports and Studies” the proposal to require completed reports prior to approval of the works plan instead of prior to approval of the concept plan. It is important to the community that all the relevant reports are completed and available for consideration prior to the concept plan being approved and the works proposal proceeding. • In Part 5 the removal of the requirement to address “the existing storm water problems experienced on the Limestone Avenue frontage of the site preferably utilising onsite methods.” • In Part 5 the removal of the requirement to provide a heritage assessment and heritage impact statement and to provide them to the ACT Heritage Council for consideration. <p>Public Consultation and Traffic Congestion</p> <p>The Planning Report doesn’t include any comments relating to consultation with the Campbell Community Association. Two Doma representatives did attend a public meeting in Campbell organised by the CCA. They provided a power point presentation demonstrating how the proposal had been reduced from the initial 600 and something dwellings to 200 and something dwellings.</p>

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		<p>Many residents present expressed opinions and concerns about the amount of traffic that would be generated along Limestone Avenue which they said is already quite congested during peak hours. Those opinions and concerns have not been included in the Planning Report.</p> <p>Thank you for your consideration of these comments on the proposed concept plan.</p>
13	Catherine Cronan	<p>am a resident of Campbell and am writing to you to provide some comments on the proposed Concept Plan for Blocks 4 & 5, Section 38, Campbell (the site) and the proposed changes to DCP 16/01.</p> <p>There is no objection to the concept plan for terrace houses. Objection is made to the plan to construct two eight-storey apartment blocks on the site.</p> <p>Since the DCP 16/01 was approved in 2016 the ACT Government has developed the ACT Planning Strategy 2018 (the Planning Strategy). The Planning Strategy was developed following a lengthy period of consultation with all relevant stakeholders in the ACT and was shaped by the many views expressed during consultation.</p> <p>The Planning Strategy clearly identifies sites suitable for Urban Intensification Localities which are depicted in purple on the plans shown on pages 7 and 40 of the Planning Strategy. Areas identified as suitable for Urban Intensification are consistently described in the Planning Strategy as the city centre, town and group centres, and transit corridors which are areas of high accessibility.</p> <p>The proposal to construct two eight storey apartment blocks on Limestone Avenue appears to be inconsistent with the Planning Strategy.</p> <p>Many professional stakeholders and community groups devoted a great deal of time and effort to contribute to the development of the Planning Strategy.</p>

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		<p>It is therefore disheartening to find that the NCA is now considering approving works that appear to be inconsistent with it on a significant site.</p> <p>While the National Capital Plan prevails over the Territory Plan and the NCA is not bound by the Planning Strategy, in this particular case the Planning Report states that the land will be ceded to the Territory after the works are completed and the land will then be treated by the Territory as if it was zoned RZ5.</p> <p>The RZ5 zoning is the highest density residential zoning in the Territory. The maximum height for an RZ5 building is 21.5 metres. However, the proposed eight-storey buildings may potentially be constructed to a height which is non-compliant with the Territory Plan prior to it being handed over to the Territory. It is not clear from the information currently provided if building to RL617 will permit construction exceeding 21.5 metres on the site.</p> <p>At page 54 of the Planning Report it states that in response to a query by the Minister about whether any changes to the Territory Plan would be required as part of the amended DCP the response was “As the Minister would be aware, the National Capital Plan overrides the Territory Plan so if the development complies with the NCP there are no issues.”</p> <p>In circumstances where the site is going to be developed for residential use and ceded to the Territory, the NCA should ensure that the maximum height limitations contained in the Territory Plan are complied with.</p> <p>The NCA should also reconsider the provisions of DCP 16/01 to ensure they are consistent both with the 2018 Planning Strategy and the zoning of the residential suburbs surrounding the site.</p> <p>Under the current provisions of DCP 16/01 a written assessment against the requirements of the ACT Planning Strategy is required. The proposal to amend the DCP includes an amendment to push that requirement back to “prior to approval of the works” rather than the current requirement for providing it “prior to approval of the concept plan”.</p>

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		<p>If the NCA is not prepared to review the DCP to make sure it is consistent with the Planning Strategy, the requirement in the current DCP to provide the written assessment against the requirements of the Planning Strategy should remain in place. That written assessment should then be made publicly available as part of the public consultation process.^[1]</p> <p>As stated above, the Urban Intensification Localities are depicted in purple on the map on page 7 of the Planning Strategy.</p> <p>Put simply, Limestone Avenue is not within a purple zone.</p> <p>Consistently with the Planning Strategy, construction of higher rise apartment blocks is proceeding along Northbourne Avenue, Cooyong Street and Constitution Avenue, (which are within a purple zone), however, this development is being approved so that the taller buildings are facing the major transit roads, and shorter buildings are being constructed on the interface between the new developments and the residential suburbs. This structuring of the shorter buildings towards the suburban interface demonstrates that care is being taken through the urban intensification process to maintain the amenity and character of the adjoining suburbs.</p> <p>At page 42 of the Planning Strategy it states that urban intensification opportunities will be investigated having regard to locational criteria which includes being within 1000 metres of the city centre. The Planning Report claims that the proposed development on Limestone Avenue is approximately 1 kilometre from the City centre. It appears from the documents provided for public consultation that the buildings will be located slightly further than 1 kilometre from the City centre.</p>


^[1] That written assessment should include information about how many metres above ground level each building will be. That information is not included in the Planning Report as far as I could see. Providing information such as RL 617 to describe the height of a building is not useful for public consultation.


Submission no.	Submitter name	Submission
		<p>However, even if the proposed development was within 1000 metres of the city centre that would not automatically make it a suitable site for construction of eight-storey apartment buildings under the provisions of the Planning Strategy.</p> <p>The Planning Strategy also states at page 42 that opportunities for infill development will be considered by neighbourhood characteristics.</p> <p>This proposed development is in the middle of two low rise residential suburbs. The residential areas in Ainslie and Reid surrounding the site are zoned RZ1 and the residential areas along Ainslie Avenue are zoned RZ4.</p> <p>The maximum number of storeys for a home in RZ1 is two and the maximum height for homes in RZ4 is 12.5 metres. The construction of two eight-storey apartment blocks in the middle of these suburbs will be out of character.</p> <p>Should the proposal be altered to replace the two eight-storey apartment blocks with more terrace houses, that would be more appropriate to the location and consistent with the Territory legislation which will ultimately govern the site.</p> <p>Further Comments</p> <p><u>Proposed amendments to DCP 16/01</u></p> <p>The Planning Report at pages 22 to 51 does not assess the proposed development against DCP 16/01. Instead it assesses the proposed development against the proposed amendments to DCP 16/01 which are referred to as DCP 19/XX.</p> <p>For example, at page 27 the proposed development is assessed against a provision to “Provide allowance for buildings with an appropriate scale along Limestone Avenue” and it is claimed that the two apartment buildings of eight storeys are consistent with that provision.</p>

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		<p>DCP16/01 currently states “Provide allowance for buildings with an appropriate scale in relation to adjacent residential development and community facilities along Limestone Avenue”. The adjacent residential development and community facilities are two-storey buildings. The construction of two eight-storey apartment blocks is not in appropriate scale to the surrounding residential development and community facilities.</p> <p>The proposal to exclude the words “in relation to adjacent residential development and community facilities” from DCP 16/01 may be construed as a concession that the construction of the two apartment buildings is not in appropriate scale in relation to adjacent residential development and community facilities.</p> <p>Similarly, in Part 5 of DCP 16/01 it is proposed to change the requirement to “demonstrate that the proposed height of the buildings shall not dominate the landscape setting of the locality” to “demonstrate that the height of the buildings shall minimise overshadowing to surrounding developments and the landscape setting”.</p> <p>Again, this could be construed as a concession that the construction of two eight-storey apartment blocks may in fact dominate the landscape setting and that the proposal may not be compliant with the current DCP.</p> <p>I submit the proposed apartment buildings will be out of character with and dominate the surrounding suburban areas and will create an incongruous vista along Limestone Avenue and from Mount Ainslie.</p> <p>I object to the proposed changes to DCP 16/01 referred to above, for the reasons indicated above.</p> <p>I also object to the following further proposed amendments to DCP 16/01:</p> <ul style="list-style-type: none"> • In Part 2 it is proposed to include the words “<i>The development anticipated in this DCP is akin to development that is currently permitted in the Territory Plan RZ5 high density residential zone</i>”

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		<p><i>which is to apply to the site once the land is transferred to Territory land.” - However, there does not appear to be sufficient detail provided to date about the potential height above ground level of the two apartment buildings to know if the buildings will be compliant with RZ5 requirements. Further, the RZ5 zoning permits buildings to 21.5 metres in height only where that is consistent with the desired character of the area.</i></p> <ul style="list-style-type: none"> • In Part 4 the inclusion of the words <i>“Building heights in each block shall be no higher than the built envelope depicted in Figure 2.”</i> The building height required in the DCP should be consistent with RZ5 requirements. It is not clear from the information currently provided for public consultation whether building to RL 617 will limit the building height to the RZ5 limitation of 21.5 metres. • In Part 4 the replacement of the words <i>“not cast a”</i> with the words <i>“minimize”</i>. • In Part 4 the removal of the words <i>“All plant and equipment are to be totally concealed from view from Mount Ainslie and Limestone Avenue.”</i> The vista from Mt Ainslie in particular is an iconic Canberra vista and should be protected. • In Part 5 the replacement of the word <i>“maximise”</i> with the word <i>“appropriate”</i>. • In Part 5 the replacement of the words <i>“take into account”</i> with the word <i>“consider”</i>. • In Part 5 the removal of the words <i>“retain existing trees where possible.”</i> • In Part 5 under the heading <i>“Supporting Reports and Studies”</i> the proposal to require completed reports prior to approval of the works plan instead of prior to approval of the concept plan. It is important to the community that all the relevant reports are completed and available for consideration prior to the concept plan being approved and the works proposal proceeding. • In Part 5 the removal of the requirement to address <i>“the existing storm water problems experienced on the Limestone Avenue frontage of the site preferably utilising onsite methods.”</i> • In Part 5 the removal of the requirement to provide a heritage assessment and heritage impact statement and to provide them to the ACT Heritage Council for consideration.

Submission no.	Submitter name	Submission
		<p data-bbox="701 328 1193 355"><u>Public Consultation and Traffic Congestion</u></p> <p data-bbox="701 384 1939 528">The Planning Report doesn't include any comments relating to consultation with the Campbell Community Association. Two Doma representatives did attend a public meeting in Campbell organised by the CCA. They provided a power point presentation demonstrating how the proposal had been reduced from the initial 600 and something dwellings to 200 and something dwellings.</p> <p data-bbox="701 555 1910 659">Many residents present expressed opinions and concerns about the amount of traffic that would be generated along Limestone Avenue which they said is already quite congested during peak hours. Those opinions and concerns have not been included in the Planning Report.</p> <p data-bbox="701 686 853 713">In Summary:</p> <p data-bbox="701 740 1933 767">The proposal to construct two eight-storey apartment blocks on the site should not be approved because:</p> <ul data-bbox="752 794 1924 1102" style="list-style-type: none"> <li data-bbox="752 794 1850 882">• The proposed eight storey apartments are not in appropriate scale in relation to residential development and community facilities in the nearby suburbs including with buildings along Limestone Avenue and Ainslie Avenue. <li data-bbox="752 898 1888 994">• Insufficient detail has been provided to date to determine if the apartment buildings will be compliant with the Territory Plan in circumstances where it is proposed to cede the site to the Territory on completion of construction. <li data-bbox="752 1010 1924 1066">• The proposal to construct two eight storey apartment blocks on Limestone Avenue appears to be inconsistent with the Planning Strategy. <li data-bbox="752 1082 1610 1102">• Traffic issues raised by residents have not been sufficiently addressed.

Submission no.	Submitter name	Submission
14	Shane West	 <p data-bbox="703 1031 1648 1110">Does this impact on the view of Mt Ainslie and the streetscape of Limestone Ave? Yes, it certainly does.</p>

Submission no.	Submitter name	Submission
		<p data-bbox="757 357 1621 384">Figure 6-8: Indicative Visual Impact cnr Limestone Avenue and Quick Street</p>  <p data-bbox="757 1098 1048 1118"><i>Source: Colin Stewart Architects</i></p> <p data-bbox="701 1150 1895 1251">Even the earlier five storey design (with sympathetic background sky rendering) clearly empathises the brutal impact of what previously was a vista of Mt Ainslie and the Ainslie Volcanics and a treelined streetscape that captured the “Bush Capital” qualities from Ainslie Ave to the AWM.</p>


Submission no.	Submitter name	Submission
		<p>The proposed design desecrates the natural landscape. The Ainslie Vocanics – (once put forward to the ACT Government for Heritage listing) and the last remnant of the Limestone Plain is a very significant landscape to Canberra.</p> <p>The flawed EPBC allows the removal of these valuable outcrops, the offsetting of the endangered species such as the proven reserve of the Sun Ray Daisy , native grassland and the habitat of the GSM.</p> <p>The panel knows the issues .</p> <p>Critique April following site visit 10 April</p> <p>The panel supports the proposal as a predominately low scale medium density residential development in this location as it provides a unique opportunity for residents to live close to Mount Ainslie Nature Reserve and within walking distance to the city centre. The panel considers that the proposed built form that transitions from two storey townhouses at the rear of the site to the medium rise apartments addressing Limestone Avenue, provides an appropriate scale and gesture to the surrounding native landscape setting. Due to the significant cross fall across the site, the panel has identified the opportunity to increase the height of part of the development in the centre of the site to achieve a transition of built form height from Limestone Avenue to the foothills of Mount Ainslie. Accompanying the exploration of additional height, we would encourage a “loosening” of the masterplan figure ground, thus affording greater retention of natural landscape features. This is discussed further below. This should be informed through further visual analysis for the proposal and ensure that due consideration for any overshadowing on neighbouring residential, the Campbell High School playing fields and adjacent public spaces has been appropriately minimised. This visual analysis should seek to understand the visual effect of development, particularly as it relates to height, bulk and mass, when viewed from the hills and ridgelines surrounding the central Canberra valley, including views from Red Hill, Black Mountain and the O’Connor ridge. The panel was encouraged to hear that engagement with adjacent lessees has commenced and encourages the design team to continue to undertake further engagement with nearby residents and Campbell High School.</p> <p>This is not correct</p>


Submission no.	Submitter name	Submission
		<p>Michael Johns has not been contacted and this house is the one that will be in shadow till 9.20 am Winter</p> <p>The panel considers that there are further opportunities to explore and refine the integration of the proposed development into the broader landscape context. This includes how the proposed master planning for this site could better integrate and capture the highly valued ‘bush capital’ elements, such as the rocky outcrops within the site and a ‘blending’ of the native vegetation at the edges of the site. The panel had noted that earlier iterations of the masterplan retained the existing rock outcrop within the site and that this was considered to be a desirable outcome. This is considered by the panel as a fundamental design issue that requires addressing in the next iteration of the masterplan.</p> <p>The panel acknowledges that the proposal presented by the proponent is in the early design phase of the masterplan and as such did not provide comments regarding the architectural expression. However, the panel considers that the proposed materials, colours and massing indicated at this early stage is appropriate to the site and its location</p> <p>Completely disagree</p> <p>The Google box top penthouses look like shipping containers and are completely out of context with the site. They are exclusive excesses catering for the top end of town at the expense of the rest of the community- Likewise with the tennis court. The residents could use Campbell High’s tennis courts like the rest of the community- This land had been quite correctly zoned Community Facility and should remain so - open to the public. Community Facility and public access must remain.</p> <p>The Key Issues and Recommendations provide detail advice to the proponent, consistent with the above recommendation.</p> <p>Site context and the Bush Capital 1.1 The panel considers that the sites location and surrounding context provides the opportunity to acknowledge and reflect the ‘Bush Capital’ character of the hills and surrounds. To achieve this, the panel strongly recommend that the proponent undertake a visual analysis of the site to inform how the proposal could better respond to the landscape context.</p>

Submission no.	Submitter name	Submission
		<p>YES</p> <p>Strident criticism of the design is well deserved:</p> <p>2.1 The panel consider that the inherent qualities of the site have not yet been realised in the proposed landscape design, specifically retention of the large remnant eucalypts and the existing limestone outcrops. The panel recommend that the proponent further explore opportunities to integrate these existing site features as part of the common open space network through the site. Additionally, opportunities to provide a more integrated transition planting at the edge of the site should be further explored, investigating how existing trees could be retained on the site and integrated as part of the open space network.</p> <p>They are not Limestone outcrops but Volcanic Dacite outcrops, still used by ANU to study these unique volcanic examples and they need to remain open to the community.</p> <p>2.4 The panel understands that there are EPBC requirements for the site that limit opportunities for pedestrian access along the northern boundary. However, the panel is also conscious that this requirement will need to be balanced so not to create a gated community in a location that is considered to be highly walkable to the city centre and Mount Ainslie Nature Reserve. In this regard, the panel encourages the team to continue to review how the site could better interface with the adjoining open spaces and streets, and to promote high levels of pedestrian access to the site.</p> <p>The EPBC was a very flawed document with no remedying features to save anything on the site, CSIRO heritage or endangered species known to be on the site- allowing complete offsets and oversite clearing and even incorrectly stating that the site had no aboriginal significance. The EPBC suggesting that a fence would help protect or preserve the remaining ACT component of the last section of the treeless Limestone plain grassland, this is a sad joke- the ACT Government has let cars be driven all over it and the site still has asbestos strips left from the copper thieves stripping the pipe insulation off the copper pipe of the old building and leaving the debris lying in the reserve and grassland. The samples were analysed by Robson’s Environmental, Fyshwick and shown to have asbestos contamination. The positive asbestos lagging was</p>

Submission no.	Submitter name	Submission
		<p>brought to the ACT Government’s Environment Department attention well over a year ago and are still lying around the site</p> <p>3.1 The panel supports the proposed arrangement of the two apartment towers to Limestone Avenue, noting the increased solar access to Limestone Avenue road reserve, protection from the south-west winds, good solar orientation and provision of vista opportunities between the buildings. However, the panel note that the solar diagrams illustrate the solar access to the single residential development on Limestone Avenue (Section 18 Reid) from 9:30am. The proponent is requested to demonstrate the overshadowing from 9am and to further engage with the lessees. Given the size of the site and opportunities for a range of development types, the panel does not support overshadowing of the adjacent existing houses on Limestone Avenue, as tested on the winter solstice from 9am</p> <p>This seems to be watered down in the May critique- They have not contacted the leasee- Michael Johns. They are now trying to have the shading accepted till 9.30am- see revised DCP. The answer of course is to change the design to get rid of the impactful Google box penthouses and reduce the height to the original Stewart design of 5 floors as below:</p>

Submission no.	Submitter name	Submission
		<p data-bbox="763 359 1729 391">Figure 6-8: Indicative Visual Impact cnr Limestone Avenue and Quick Street</p>  <p data-bbox="792 1129 1061 1149">LIMESTONE AVENUE & QUICK STREET INTERSECTION</p> <p data-bbox="1742 1129 1809 1149">PROPOSED</p> <p data-bbox="770 1187 1088 1209"><i>Source: Colin Stewart Architects</i></p>

Submission no.	Submitter name	Submission
		<p data-bbox="701 328 1921 392">Even a five storey design is impactful, however the reduction in height completely eliminates shading of the residence across on the other side of Limestone Ave. Imagine having a house shaded till 9.20 am?</p> <p data-bbox="701 411 1921 475">Earlier designs showed that the rocky outcrop could be kept. The tennis court needs to go and must have been included as a token appeasement item which can be shown to be removed in good faith.</p>  <p data-bbox="701 986 1825 1066">https://www.nca.gov.au/sites/default/files/consultation/Community%20Consultation%20Flyer%202023%20August%202018%20A.pdf</p>

Submission no.	Submitter name	Submission
		 <p data-bbox="705 869 1926 1005">The earlier Abacus and Doma designs (even the outrageous design above) must have realised that rocky outcrops were off limits. I believe the weak EPBC decision has now been the reason that Doma, Purdon's and Stewart's think they can have a tilt to remove the rocky outcrops and replace it with a tennis court with this new design and get away it.</p> <p data-bbox="705 1021 1556 1061">All of the Ainslie volcanic outcrops (they are not Limestone) must remain.</p>

Submission no.	Submitter name	Submission
		 <p data-bbox="703 1177 990 1206">Ainslie volcanic outcrops</p> <p data-bbox="703 1228 1872 1257">The Ainslie volcanic outcrops need to be incorporated into the landscape design – not to be removed</p>

Submission no.	Submitter name	Submission
15	Department of Finance	<p>I refer to your letter of 2 July 2019 to the Department of Finance (Finance) advising that the National Capital Authority (NCA) had released for public consultation the Concept Plan and revised Development Control Plan (DCP) to guide the development for Blocks 4 & 5 Section 38 Campbell (the Site).</p> <p>We note that the proposed Concept Plan outlines the broad development intent for the planning and design of the site prior to the submission of detailed development plans. We are also aware that the DOMA Group (DOMA) is also seeking changes to the existing DCP to facilitate the adoption of the proposed Concept Plan. After careful review and consideration of the documentation released for public consultation, Finance is able to advise that it has no objection or comment in regard to the proposed variation.</p> <p>On 24 July 2019 Finance and NCA staff met to discuss DOMA's proposal and the processes following the outcome of the NCA's public consultation process. It was agreed that once the NCA has made its decision on the Concept Plan and revised DCP, Finance will be in a position to consider a proposal by DOMA to seek a variation to the existing Crown Lease - the terms of which will be discussed with the NCA. It was also noted and agreed that any proposed works approval applications to be considered for approval in respect of the Site will need to be consistent with the terms of the varied Crown Lease.</p>
16	Michael Johns and Cathie Gough	<p>We are writing to voice our deep concerns in relation to the DOMA development proposed on the Campbell CSIRO site. Our address is 27 Limestone Ave Reid and we are directly across the road from the proposed development.</p> <p>Winter Solstice Overshadowing</p> <p>To provide context, we hold an approved DA for a knockdown rebuild of a Solar Passive house for 27 Limestone Ave, including rooms at the front of the house to take advantage of the morning sun. We understand from the DOMA design NCA review document that DOMA mentions oversight and shadow fall that affects their own development, however does not seem to provide the same concession to houses</p>

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		<p>impacted externally of the development. The NCA document implies that DOMA has been in contact with us in relation to overshadowing. We have not had any contact from DOMA in relation to this matter at all. We understand that DOMA is requesting an additional 30 minutes in the overshadowing period in their development. We find this proposal entirely unacceptable. In the design of our own new dwelling we ensured that we simply complied with all overshadowing restrictions, and designed to incorporate those building envelope restrictions.</p> <p>Building scale and setback</p> <p>In addition to above major concern, there is no precedent for an 8 story building anywhere along the length of Limestone Avenue. The only two buildings of significant height are Campbell High School and the Australian War Memorial. Both these buildings have very large setbacks from Limestone Ave. The large setbacks add to the tree lined promenade feel of the road, which is at the very essence of what is old Canberra. Reid is a heritage area and a development of the proposed scale in such close proximity to the road will simply dwarf both the Reid locality and the Australian War Memorial building which of course is a national icon.</p> <p>General concerns</p> <p>We also predict considerable impact on the amenity of the suburb through:</p> <ul style="list-style-type: none"> • increased traffic, and future traffic management • reduced walking access to mount Ainslie, and • encroachment of residential tower block in old Canberra heritage area.

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		<p>We are not opposed the development of the site, our concerns focus simply on the scale and visual volume of the proposed development without regards to the values of the locality.</p> <p>We would welcome the opportunity to discuss our concerns with you in person as soon as possible.</p>
17	Christine Vincent	<p>As an introduction to my submission I wish to make it clear that I am not opposing housing development on Blocks 4 & 5, Section 38 Campbell. However I strongly oppose two high-rise (8-9 storey) apartments adjacent to Limestone Avenue. All comments should be read within this context.</p> <p>I welcome the “overall low scale-medium density” (see Design Review Panel p4) development on the site, the reduction in gross floor area and lowering of building heights over the majority of the site.</p> <p>In March 2016 the NCA released Draft DCP 16/01 for public consultation. In submissions I, and others, argued that it would be inappropriate to permit high-rise buildings on Limestone Avenue. In the subsequent Consultation Report (May 2016) the NCA’s constant response to comments relating to the lack of specific controls over site planning, building density, building height and land use, was that the DCP is “<i>a broad framework for further planning work to be undertaken. The upper limits on development capacity of the site and broad land use controls will provide sufficient flexibility for the lessee to investigate future uses for the site.</i>” It was disappointing that the DCP gave such broad flexibility to the developers. It provided scant professional guidance on such important issues and virtually left it to the developers to come up with their preferred ideas.</p> <p>In the interests of due process, it is hoped that the revised DCP will be agreed and published before the Concept Plan is adopted. Given that the DCP sets the framework for planning, the process demands that sequence. Unfortunately the NCA website and the Purdon Planning and Design Report January 2019 (Purdon Report) continually refer to this process in the wrong order. The proposed changes to DCP 16/01 are not minor. Knocking out words here and there to “avoid ambiguity”, and “minor” changes to over-shadowing and setback provisions actually changes the substance and the spirit of the existing DCP regarding the place of the development in its broader environment. The original words were put there for a purpose.</p>

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		<p>I welcome the establishment of the National Capital Design Review Panel (DRP). For brevity I will resist commenting on its many excellent recommendations, but it is hoped that they are carefully considered in the amendments to the DCP and revised Concept Plan. The DRP wrote <i>“Noting the early stage of the master planning process, the panel recommends that the key issues and recommendations outlined in this advice are addressed by the proponent and welcomes a further review by the panel for an amended proposal, prior to lodging the proposal for works approval.”</i></p> <p>Further, the NCA notes that the Concept Plan is to guide detailed planning and design. It seems that the presented Concept Plan is not reflective of the DRP’s suggestions which begs the question whether any significant changes are going to be made, and if the community will have the opportunity to review them before the process moves to the works approval stage when it is too late for meaningful input? I submit that there should be a public consultation (not just an Information Session) where the recommendations from the DRP are discussed in detail and responded to by the developer and NCA. So much of the Panel’s thinking reflects the community views that I am hearing.</p> <p>The problem with writing this submission is that one wants to continually reference the DRP to support various comments against amendments to the DCP and issues of contention in the Purdon Report which would make the submission ridiculously long. However, if the two submissions were separated the DCP could be dealt with and the Concept Plan considered within the approved DCP. The way it is now, it seems the DCP is being designed to support all the developer’s requirements rather than being an objective Development Control Plan for the National Capital. There is no indication where the NCA stands on the proposed amendments. It must have a view? If the proposed amendments to the DCP have been circulated by the NCA does this indicate the amendments are supported by the NCA?</p> <p>Proposed amendments to DCP 16/01</p> <p>DOMA Group purchased the lease of the land from Abacus in June 2016 with DCP 16/01 in place. In its introduction to this current Public Consultation the NCA states that <i>“Planning and design provisions already established by the DCP are not subject to change, including:</i></p>

Submission no.	Submitter name	Submission
		<ul style="list-style-type: none"> • <i>A maximum permitted height limit of RL617</i> • <i>Residential land use. “</i> <p>(It is not clear which other “<i>planning and design provisions</i>” are not subject to change?) Unfortunately the NCA advocates flexibility for the developer, but no flexibility in addressing community concerns re siting because it argues that the developer has the right to put any building up to RL617 anywhere it chooses on the site. I submit that this is a very unsatisfactory method of planning. There are other provisions in the DCP that, if words are to have any meaning, should restrict the proposed siting of the 8 storey apartments on Limestone Avenue. Also there are other areas on the site where RL617 could be achieved without having an overbearing and destructive impact on the character of Limestone Avenue and surrounds. Note the DRP’s suggestion: “<i>Due to the significant cross fall across the site, the panel has identified the opportunity to increase the height of part of the development in the centre of the site to achieve a transition of built form height from Limestone Avenue to the foothills of Mount Ainslie.</i>” If this suggestion were followed the apartments in Block 1 could be reduced to an acceptable size and the plan still provide a similar number of apartments/townhouses for the market.</p> <p>It should be noted that the southern apartment tower appears to be 9 storeys not 8. (see AO16 Built Form Perspectives).</p> <p>Comments on Proposed Amendments</p> <p>Below I have included extracts from DCP 16/01 which show proposed amendments I wish to oppose, plus sections of the DCP (underlined) which provide context for my objections. My comments are in Blue, the proposed amendments are in Red. All numbering has been removed.</p> <p>Metropolitan Planning Objectives</p> <ul style="list-style-type: none"> • Ensure development and redevelopment is carefully managed so that it achieves a high standard of residential amenity, makes a positive contribution to the neighbourhood and landscape character of the area and does not have unreasonable negative impacts on neighboring properties.

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		<ul style="list-style-type: none"> • The development anticipated in this DCP is akin to development that is currently permitted in the Territory Plan RZ5 high density residential zone which is to apply to the site once the land is transferred to Territory Land. <p>I oppose this amendment. It is an explanatory statement rather than a Planning Objective.</p> <p>The Purdon Report states that this is a medium-density development (See 2.1, 3.2 p.4) – the DRP describe it as “predominantly low, medium scale”. In its assessment against the proposed DCP 19/XX the developer explains that this amendment is <i>“to provide clarity about the type of development that this would be similar to that permitted in the Territory Plan.”</i> (Purdon Report p.25).</p> <p>I refer to the ACTPLA definition of RZ5 – High Residential Zone</p> <ul style="list-style-type: none"> • <i>Buildings have a maximum height of 21.5m and are generally up to <u>6 storeys</u></i> • <i>If located near to low rise residential areas, community facilities or parks and recreation areas, a maximum of <u>three storeys</u> is required to limit the impact of high rise buildings in terms of <u>bulk and scale as well as overshadowing.</u> (My underlining)</i> <p>It further states that <i>“Some RZ5 areas are subject to precinct code provisions that may specify lesser or greater heights or other provisions that are deemed to be appropriate. “</i></p> <p>I submit that no case has been presented to show why a greater height on Block 1 of the proposed Concept Plan is appropriate, other than the developers want it (and admittedly NCA says they can have it) but that doesn’t make it right for the site. Given the unique nature of the site, its proximity to the community facility Campbell High School (CHS) and the Australian War Memorial (AWM) it is yet to be argued how 8 storey buildings could be considered appropriate or meet the Urban Design Objectives.</p> <p>Urban Design Objectives</p> <p>Development of the site is to demonstrate its consistency and applications are to provide specific details on how the following urban design objectives are met.</p>

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		<ul style="list-style-type: none"> • Enhance the character of Limestone Avenue as a Main Avenue of the National Capital and recognize its importance as one of the main approaches to the Australian War Memorial and Anzac Parade. • Encourage modulation, tactility, silhouette and human scale in relation to built form and streetscape design. • Maintain and reinforce the character of both Ainslie Avenue and Limestone Avenue and the wider landscape setting of the National Capital. • Provide allowance for buildings with an appropriate scale in relation to adjacent residential development and community facilities along Limestone Avenue. <p>I oppose this amendment. It clearly shows that the developers recognize that high-rise buildings are not appropriate in relation to adjacent areas and school. Purdon Report p.27 states <i>“The reason for this is to remove any ambiguity that these word created with respect to the objective of increase height and density on the site.”</i> Ambiguity is not the problem: it is the siting of two inappropriately high buildings that is. I say, don’t change the Design Objectives; change the design to meet the Objectives. Even if the proposed deletion were agreed, how can it be argued that the 8/9 storey buildings are of an appropriate scale and maintain and reinforce the character of Limestone Avenue? What is the character of Limestone Avenue? There are NO 8 storey buildings on its entire length or its continuation onto Majura or Fairbairn Avenues in either direction. The nearest high-rise are those newly built in Canberra City at the end of Ainslie Avenue more than 1km away.</p> <p>Land use and desired planning outcomes</p> <p>Development Area</p> <p>Permitted land uses on the site are Residential and ancillary uses only.</p> <p>This amendment is noted, however there has been no proper community discussion regarding change of zoning from Community Facility. I reluctantly accept that this is a lost cause and a loss to the community.</p>

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		<p data-bbox="701 328 1861 355">The gross floor area (GFA) of all building erected on the site must not exceed 40,000 square metres.</p> <p data-bbox="701 379 1939 507">This is an unnecessary amendment and one wonders why it has been suggested except for publicity purposes. It is welcomed that a lower GFA is planned, but just because there is a greater GFA allowed does not demand that the developer use it to the maximum. DOMA say it is a restriction they have put upon themselves!!</p> <p data-bbox="701 531 936 558">Landscape Zone 1</p> <p data-bbox="701 582 1787 609">This area shall be 8m wide and can incorporate private open space to the southern boundary.</p> <p data-bbox="701 633 1861 697">The retention of the 8m wide landscape zone is accepted but I strongly oppose the incorporation of private open space into this and all Landscape Zones.</p> <p data-bbox="701 721 1939 920">This southern boundary is shared with the CHS. Previously the 20m access road joined this buffer zone providing more than 28m building setback from CHS. The proposed amendment moves townhouse development up to the 8m buffer zone. The incorporation of private spaces and courtyards up to 2m into that 8ms brings it far too close to the school. There are other resultant impacts including the removal of existing buffer trees, over-sighting etc. and it should be noted here that the developer proposes to remove all but a couple of existing trees from the entire site.</p> <p data-bbox="701 944 1926 1149">My comment here applies to all the various encroachments and proposed changes to landscape zones, whether they are for articulation, stairs, tennis court, swimming pool, or whatever. The developer has 4 hectares to play with, no old building in the way, and knew exactly where the borders and setbacks were. It is inconceivable that architects and planners can't plan within the given parameters and still provide an acceptable financial return and a decent design outcome. Wasn't there a design competition (Purdon Planning p. 4)? Why is it that boundaries, literally, are always pushed?</p> <p data-bbox="701 1173 1926 1300">Minor encroachments of building elements may be located within the landscape zone where they contribute to the articulation of the building form. These elements may encroach within the landscape zone no more than a maximum of 2 metres. The total area of all building encroachments on the site is to be no more than 2.5% of the total area of all the landscape zones. Building is defined as a structure with a</p>

Submission no.	Submitter name	Submission
		<p>roof and walls. Other structures such as courtyard walls, fences, terraces and stairs associated with the private open space are permitted within the zone.</p> <p>The articulation should be within the existing boundaries: just plan it. If stairs or terraces up to 2m are permitted in Zone 1 they would be just 6m from the CHS boundary. This is unacceptable.</p> <p>References to 2.5% of all landscape zones are not informative unless the total area of the landscape zones is known. Is it included to show it is just a tiny percentage of encroachment? But the percentage is an irrelevance anyway. What is relevant is the 2m encroachment near the southern school boundary, and even further in other landscape zones.</p> <p>Landscape Zone 2</p> <p>This area shall form the building setback to the Limestone Avenue frontage. This area shall be a minimum of 15m wide and shall be well landscaped with native trees and/or shrubs appropriate to the commensurate with the landscape character of the surrounding area Mount Ainslie. This area will need to mitigate the potential impacts of major infrastructure on the site. Accepted.</p> <p>Structures such as a pool and associated recreation facilities and amenities are permitted in this area. No structures, buildings or articulation elements are permitted to encroach on Landscape Zone 2.</p> <p>This amendment is opposed. What compelling argument is there for overturning the existing requirement which specifically does not permit encroachment of structures, buildings or articulation elements? This is not to say that a pool and tennis court should not be within the development, but they should be within the boundaries, not encroaching into the Landscape Zones. Purdon Report (p.30) states that <i>“the pool is setback 6 metres from the front boundary and this area will be landscaped”</i>. I submit that the current 15m setback in Landscape Zone 2 should be retained as stated for planting to mitigate the potential impacts of major infrastructure.</p> <p>It is disappointing to note in Purdon Report (p.53) that plans were discussed with the NCA, <i>including frontage to Limestone Ave, perimeter landscape buffers and landscape design</i>. These are then described on the NCA website as <i>“encroachment of minor building elements, and recreation facilities within the</i></p>

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		<p>landscape zones". With due respect, one has to wonder if any opposition to the developer's wishes are going to be independently considered.</p> <p>Landscape Zone 3</p> <p>This area shall form the building setback along the northern frontage of the site. This area shall be a minimum of 10m wide with considered intrusions permitted for articulation, and shall be well landscaped with a mixture of native trees and/or shrubs appropriate commensurate with to the landscape character of the surrounding areaMount Ainslie.</p> <p>Minor encroachments of building elements may be located within the landscape zone where they contribute to the articulation of the building form. These elements may encroach within the landscape zone no more than a maximum of 3 metres. The total area of all building encroachments on the site is to be no more than 2.5% of the total area of all the landscape zones. Building is defined as a structure with a roof and walls. Structures such as tennis court are permitted in this area.</p> <p>This area will need to mitigate the potential impacts of major infrastructure on the site. No structures, buildings or articulation elements are permitted to encroach on Landscape Zone 3. Access roads and associated infrastructure may be permissible to facilitate the access point shown in Figure 1.</p> <p>See comments made above in Landscape Zone 2. In this zone the minor "articulation" intrusions into the 10m buffer zone are up to 3m and it seems the encroachment of the tennis court is 5.5m and is strongly opposed. It is presumed that a tennis court will have a high mesh fence which would be an intrusive visual impact on the northern edge of the site. The DRP also made comments in relation to the "tight" siting of the court. Please</p> <p>note the proposed deletion of "This area will need to mitigate the potential impacts of major infrastructure on the site." That is an important issue.</p> <p>Landscape Zone 4</p>

Submission no.	Submitter name	Submission
		<p>This area is to provide for the main access road from Limestone Avenue to the site (Figure1). This area shall be 20m wide and can incorporate a new access road and parking (limited to a maximum of 3 parking spaces).</p> <p>Minor encroachments of building elements may be located within the landscape zone where they contribute to the articulation of the building form. These elements may encroach within the landscape zone no more than a maximum of 5.5 metres. The total area of all building encroachments is to be no more than 2.5% of the total area of all the landscape zones. Building is defined as a structure with a roof and walls. Structures such as tennis court are permitted in this area.</p> <p>Changes to the main access road are not opposed, but all other amendments are for the reasons mentioned previously.</p> <p>Urban design principles</p> <p>Buildings should provide high quality articulated frontages to Limestone Avenue. ... Built form shall be distributed as to ensure no specific building dominates the site and will be sufficiently separated to provide ample space for functional open space areas and provide sufficient sunlight to areas of the public realm.</p> <p>Comment: N.B "...to ensure that no specific building dominates the site"!!</p> <p>Buildings and structures on the site shall conform to the requirements of part 3 of this DCP. The height of buildings is to be such that the shadow cast at 9.30am on 21 June must not encroach on Sections 11 or 18 Reid. No structure shall exceed RL 617.</p> <p>Amendment strongly opposed. Much could and should be written about this, but for brevity it is suggested that this clause would be redundant if buildings in Block 1 were of a reasonable height where there would be no overshadowing extending across the width of Limestone Avenue or onto CHS grounds.</p>

Submission no.	Submitter name	Submission
		<p>The height of buildings must minimize not cast a shadows on the outdoor playground areas of the Campbell High School during between 9am to 3pm. Overlooking of the High School grounds should also be mitigated through building design and siting.</p> <p>Amendment strongly opposed for the same reason as above. Also “minimize” is a relative term; “not cast a shadow” should remain.</p> <p>Deletion of “Overlooking of the High School grounds etc” is a serious concern and must not be agreed. I reiterate, words were inserted in DCP 16/01 for a purpose, and nothing has changed to make these words redundant.</p> <p>Articulation elements are not permitted in accordance with the to encroach in the Landscape Zones as described in Section 3 by Figure 1. Blank facades to public spaces or streets are not permitted.</p> <p>Amendment strongly opposed for reasons stated earlier.</p> <p>Detailed transport assessment and network design</p> <p>I refer to my submission to the draft DCP 16/01 three years ago where I detailed traffic implications. The only change since then is that traffic is significantly heavier. The AECOM Traffic Impact Assessment is seriously outdated, even with a SCATS update on 7 August 2018. Crash analysis figures date back to 2016. (AECOM Report p.5). Living on Limestone Avenue I am aware of the problems when trying to enter the Avenue and generally it is preferable to detour to the Ainslie Avenue lights to access Limestone Avenue in either direction. This will not be an option for residents in the new development.</p> <p>Please note that the intersection of Limestone Avenue / Euree Street / Treloar Crescent is not signalised as stated in the AECOM Report (p5) which is where most of the reported crashes occurred (p6). One can imagine that this intersection will get worse as more parents use Treloar Crescent to take children to CHS rather than via Quick Street, and additional resident traffic is trying to turn from Limestone Avenue into Euree Street or U-turn into Limestone Avenue northbound.</p>

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		<p>Heritage assessment and impact statement /Ecological assessment and EPBC Act Requirements --- The proposed action for medium to high density residential development has been referred to the Commonwealth Department of the Environment and Energy (DEE). On 27 July 2018, DEE issued an approval with conditions under the EPBC Act (EPBC 2014/7372). Any concept plan or detailed development proposal is to be consistent with the relevant conditions of the EPBC approval. Reference is made to the Planning and Design Report as to how any concept plan or detailed development proposal complies with the EPBC approval.</p> <ul style="list-style-type: none"> • heritage significance and values of those existing elements of the site shall be assessed and formal heritage assessment prepared by a heritage consultant shall be provided as part of the concept plan. A heritage impact statement (HIS) must be provided for any redevelopment works and must include advice on mitigation measures to protect any identified heritage values. The assessment and HIS is to should be provided to the ACT Heritage Council for consideration. • Ecological assessment and EPBC Act requirements– Any adverse environmental impacts arising from the development proposals shall be identified by the lessee in accordance with the relevant Commonwealth and Territory legislation. The lessee shall demonstrate compliance with the <i>Environment Protection and Biodiversity Conservation Act 1999</i> (Cwth) in relation to any matters of National Environmental Significance on the site or adjacent to the site as part of the concept plan. <p>This amendment is opposed. Obviously the wording has to be changed but a DCP should not include statements relating to actions that have been taken by the proponent. Nor should Heritage and Environment be lumped together even if both are addressed in the EPBC Referral. The EPBC referral process was appalling with no community involvement as evidenced by the sole submission from Department of Finance which opposed it! This amendment refers to the “proposed action for medium to high density residential...”: so which is it: low/medium, medium/high? So many inconsistencies.</p> <p>Public Consultation</p> <p>Any concept plan and detailed development proposals prepared for the site, in accordance with this DCP, will be subject to public notification and consultation prior to approval by the relevant planning authority.</p>

Submission no.	Submitter name	Submission
		<p>Any subsequent approval of the concept plan does not remove or prejudice the requirements of future developments to be assessed by the relevant planning authority against the Plan, this DCP and any approved concept plan.</p> <p>Detailed development proposals will be accessed for consistency against provisions of this DCP and the approved concept plan.</p> <p>This amendment is welcomed.</p> <p>Conclusion</p> <p>It has been hard not to get side-tracked into trying to deal with many contentious issues in the volume of material in the Purdon Report and attachments. It is all too much, which is why I have chosen to focus on amendments to the DCP. Also I am unsure what the DCP is going to look like and therefore how the circulated Concept Plan might change. I recognize the DCP and Concept Plan are, to an extent, inter-dependent but there should be an order of precedence for consideration.</p> <p>I request that there be another Public Consultation, (not just an hour of Information) where the proposed amendments, plus recommendations from the DRP could be discussed and responded to by the developer and NCA before the DCP is finalized. That would provide true community consultation. If widely advertised a forum to open up discussion about development on such a significant National Capital site would, no doubt, be highly regarded and attract input from the wider community who have an abiding interest in the development of the National Capital.</p> <p>Finally, there are many serious issues of concern about the Concept Plan, including but certainly not limited to</p> <ul style="list-style-type: none"> • lack of any reported consultation with the local Indigenous community; • planned removal of all existing trees • the apparent planning for a “gated community”

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		<ul style="list-style-type: none"> • the removal of natural landscape features, particularly the “rocky outcrops” which were considered “fundamental design issues” by the DRP • apparent lack of understanding and response to this unique site within the context of the Bush Capital and significant National Capital environment • the complex change of responsibility from the NCA, via the Department of Finance to the ACT Government jurisdiction and the resultant lease arrangements, betterment taxes; all issues out of public sight. <p>I again stress how inappropriate it is to introduce two 8 storey towers into a low scale suburban environment. They would be blight on the street and landscape for decades to come. This development will be on the most significant and beautiful site remaining for housing development in the National Capital. It cannot be a lost opportunity.</p> <p>With due respect, I can say that planning around this site has been a seriously flawed process. Three years of communicating with the NCA, Department of Environment and Energy and Department of Finance has been a disturbing and unrewarding experience. Now I look forward optimistically, particularly if the NCA takes note of input from the Design Review Panel and listens to voices from the community who care deeply about their city.</p>
18	Jane Goffman	<p>Background</p> <p>I know this stretch of Limestone Avenue quite well, having driven along it twice a day for many years, cycled it on weekends to reach the lake, and walked it to attend the Anzac Dawn ceremony. I am a professional planner, a member of the Council of the National Trust (ACT), convenor of Dickson Residents Group, and have been an active member of North Canberra Community Council for approximately 7 years.</p> <p>Issue No. 1 Poor consultation methodologies produce poor outcomes</p> <p>Experience shows that most people will be busy with their own lives, work, families, health, studying, or other volunteering and social commitments, and rely on government planning agencies to discharge their responsibilities. The material provided on the NCA’s website comes to 83 separate reports and files, far</p>

Submission no.	Submitter name	Submission
		<p>beyond the capacity for most members of the public to wade through and digest, let alone make a meaningful response to. Lack of any zipfile makes downloading and reviewing these an absurdly laborious and time consuming process. The online survey tool is a useful barometer, but leading questions and assumptions built in to those questions will distort results. The probability remains that most respondents will have a limited understanding of what the development and DCP consist of, because very few owner-occupied homes lie close enough for affected residents to engage directly with a complex major development of this type.</p> <p><i>Issue No. 2 The sheer complexity of the project acts as a deterrent to engagement</i></p> <p>The nature of this project is complex by virtue of its relative scale and numbers, the history of the sale and CSIRO heritage aspects, plus its proximity to a wide range of surrounding land uses. The site itself is large, the topography and geology and vegetation are varied, the context is unusually multi-faceted and there are potentially a number of environmentally significant aspects and triggers to consider. Limestone Avenue is a major arterial road that connects to both Fairbairn Ave and Anzac Parade so its function within the road network is critical, Campbell High School and its rear car park serve a very wide catchment, the residential dwellings nearby comprise both private homes and a mix of public housing (including the specialised services of Ainslie Village), there is the heritage precinct and character of Reid, Mt Ainslie nature reserve and the Australian War Memorial, the Reid oval, the hotel and pub, and the city centre over 1km away. A further layer of complexity arises because this process is all being administered by a federal entity at a remove from Territory government, answerable to its own Board and non-ACT Minister, with its own legislation.</p> <p>Given that complexity, failing to differentiate between the many stakeholders and devise a suitable variety of techniques for engagement is likely to produce a narrow set of findings. A low response rate and narrow field may be used to undermine the credibility of those submissions that are received. Treating the survey results and submissions as a valid sample of public opinion would be a mistake, but they will nevertheless be the tip of the iceberg and a useful guide.</p> <p><i>Issue No. 3 The traffic and road safety impacts are serious and have not been properly analysed</i></p>

Submission no.	Submitter name	Submission
		<p>Limestone Avenue is a major arterial, whose southern alignment dates back to the Old Yass Road, which pre-dated Federation and passed the early settlers' original post office in what became known as Ainslie (later gazetted as Reid). The Griffins' Plan realigned the road slightly to create a symmetry with the axial of Majura Avenue and linked it via a railway station to Wattle Street further north, but the final alignment was shifted to allow room at the base for important public land uses.</p> <p>The traffic report fails to address a raft of important issues and adopts a number of questionable assumptions. The results in my opinion are unreliable.</p> <p><i>Issue No. 4 The social, heritage and environmental impacts have been glossed over</i></p> <p>I am not confident that the new concept proposal is objectively well suited to the site and its surroundings, or that the many likely adverse impacts of redeveloping this site have been adequately addressed and mitigated. An EIS would be the best way of dealing with those issues. I believe the scale (RL617 with a setback of 15m produces a likely 30m structure ie the equivalent of 9-10 storeys depending on rooftop plant structures) is excessive and will generate a number of significant adverse impacts over years to come. Those include overshadowing Limestone Avenue during the morning peak period in winter when ice on the road is hazardous, and dominating the skyline and main approach in the immediate vicinity of the War Memorial and Anzac Parade. View corridors to Mt Ainslie and the War Memorial from multiple vantage points will be diminished by the seemingly random placement of two large and highly visible new apartment buildings jutting out with no apparent relationship to surrounding built form, landscape characteristics or the Ainslie Avenue axis.</p> <p>The approach to heritage and environmental impacts has contrived to ensure that the built fabric that might have been saved has been lost, endangered species found are destroyed, and the landscape is cleared and substantially excavated and modified. Placement of a luxury compound on a site that's regularly traversed by school students and public housing tenants suggests that this is likely to become a gated community, in direct sight of the Australian public. That would send a very disturbing message about the symbolic values that the National Capital Plan is meant to uphold.</p>

Submission no.	Submitter name	Submission
		<p>Conclusion</p> <p>Working through the plans and different versions of the DCP together with a multitude of documents is not a reasonable proposition. Having spoken with residents of the three suburbs most immediately affected (Ainslie, Reid and Campbell) and residents of the other suburbs that regularly use Limestone and Fairbairn Avenues (Braddon, Dickson, Downer, Watson and Hackett) and listened to two separate presentations by Mr Rob Purdon to the NCCC, I am concerned that the consultation from the start has been paternalistic, superficial and dismissive. There has been no apparent attempt to confront the elephant in the room, which is the long term urban planning consequence of developing and servicing a high density multi-unit proposal at this particular location on the outer edge of the city centre, contrary to and in conflict with the 2018 ACT Planning Strategy and City Renewal Authority's program.</p> <p>In summary, the visual impact of the two major buildings proposed closest to Limestone Avenue will create a potentially unsightly anomaly. In my opinion, the traffic and road safety plus environmental and social impacts if this goes ahead without further changes are likely to erode support for the 2018 ACT Planning Strategy and City and Gateway framework, and may ultimately reduce confidence in the professionalism and integrity of the NCA and the National Capital Design Review Panel.</p> <p>I therefore cannot support the proposal in its current form and regard the revised DCP as a weak compromise and ineffectual form of development control. I would argue that an EIS is warranted and necessary.</p>
19	John Warren	<p>I am a resident of Campbell. I have the following comments. I tried to take the on-line survey, but it lost much of the important parts of my input.</p> <p>Cycle access:</p> <p>I wish to see cycling access maintained between Hayley Street, Ainslie, and Treloar Crescent, Campbell. Cycling in Limestone Avenue is dangerous, given the narrow road lanes and the heavy traffic, especially large trucks towing large trailers.</p>

Submission no.	Submitter name	Submission
		<p>7-8-storey apartment buildings along Limestone Avenue:</p> <p>I am opposed to 7-8-storey apartment buildings along Limestone Avenue on the approaches to the Australian War Memorial, and Anzac Parade.</p> <p>Overshadowing of outdoor playground areas of Campbell High School:</p> <p>I consider that there should be NO overshadowing of outdoor playground areas of Campbell High School between 800 a.m. and 400 p.m.</p> <p>Traffic effects:</p> <p>The proposed development will exacerbate the existing heavy traffic in the area (Limestone Avenue, and the roundabout at Anzac Parade by the War Memorial) during peak periods. The need for all traffic exiting the development to turn left (generally South-Easterly) into Limestone Avenue, even traffic eventually wanting to head in a North-Westerly direction along Limestone Avenue, will add to the peak-period chaos at the roundabout !</p> <p>I would like to be advised by the NCA of further consultation on the revised Development Control Plan.</p>
20	National Trust of Australia (ACT)	<p>We note that DCP 19/01 has planning objectives:</p> <p>“Design quality and landscape structure of the National Capital” and “a high standard residential amenity, makes a positive contribution to the neighbourhood and landscape character of the area and does not have unreasonable negative impacts on neighbouring properties.”</p>

Submission no.	Submitter name	Submission
		<p>This is followed up with Urban Design objectives that include quality urban design, excellence in architecture, landscape architecture, enhance character of area, human scale of built form, streetscape design and maintain character of both Ainslie Avenue and Limestone Avenue.</p> <p>The urban design principles provide further details articulating the above points and include such items as no specific building dominates the site, continuous parapets are not permitted, high quality communal space, and respect to corner of Limestone Avenue and Ainslie Avenue by the two main buildings. All the above aim at a quality of design and maintenance of the urban design and streetscape character plus a human scale.</p> <p>The National Trust is concerned with the impact of the proposal on the urban design, its relationship to the adjacent heritage listed area of Reid and views along Ainslie Avenue which is an important planning avenue of Canberra.</p> <p>The proposal:</p> <ul style="list-style-type: none"> • Removes all vegetation from the site • “Does not significantly overshadow adjacent properties”. • Does not address urban design issues related to Reid Housing Precinct and scale. <p>The proposal in our opinion does not appropriately respond to the urban design requirement or make a positive contribution to the neighbourhood. It also does not achieve the high quality of landscape design and the human scale of the built form is not met. There is over shadowing of adjacent properties and there is a substantial continuous parapet of the major buildings. The buildings show a substantial massing that faces the intersection of Ainslie Avenue and Limestone Avenue and has little respect to the human scale of the Reid precinct. The design report states it enhances the character of Limestone Avenue with no justification or supporting argument. Views from Ainslie Avenue and Mt Ainslie and along Limestone Avenue with the Reid Precinct would have been useful in assisting understanding the proposal.</p> <p>Further comments on the Design report include:</p>

Submission no.	Submitter name	Submission
		<p>P25</p> <p>The two towers will enable views to Mt Ainslie between the two towers but from the images provided this is minimal.</p> <p>P27</p> <p>The use of sandstone and rock walls is no replacement for the large rocky outcrops that have always dominated the site.</p> <p>P26-27</p> <p>There is no discussion on the relationship of the design to the Reid Precinct and domestic scale that exists at present.</p> <p>We believe the proposal needs more work to achieve the Urban design and heritage related objectives of the DCP.</p>
21	Peter Hislop	<p>Having lived opposite the site for more than 10 years and attended the public information session last month, I offer the feedback below on the current proposal:</p> <p>I believe that changed use and built form of the current proposal is inappropriate for this site which forms the city/bush boundary:</p> <ul style="list-style-type: none"> • The former commercial use of the site was low-key as was appropriate for such a sensitive interface site. It left large sections of the site in a natural state, and it was only occupied during office hours, five days per week. The current proposal replaces this with an anomalous island of high-density residential dwellings disconnected from others by the barriers of Limestone Avenue, Campbell High School, and public reserves. • While the permitted maximum building height above sea level is unchanged, the former single tower was set back to the centre of the site, and well screened from Limestone Ave by vegetation. Instead of being a transition between the urban landscape and the greenery of Mount Ainslie

Submission no.	Submitter name	Submission
		<p>Reserve and the War Memorial, the two proposed towers will dominate the vista along Limestone Avenue.</p> <ul style="list-style-type: none"> • Recent public discussion about redevelopment of government sites raise concerns that the current proposal may set a high-rise precedent for changing other nearby streetscapes. • Discussions of the site traffic access to and from Limestone Avenue at the information session seemed unresolved and perhaps optimistic. I'd like to see this better addressed.
22	Bert Read	<p>I am an architect who has worked in Canberra and surrounding New South Wales since the early 1970s beginning as supervising architect for the NCDC-funded Swinger Hill Stages I and II cluster housing project.</p> <p>I wish to comment on the proposed development of the ex-CSIRO site in Campbell. If this special land is for some irrefutable reason to be used for housing rather than more appropriately as an extension of the open spaces to the east and west of the War Memorial, it must be obvious to even the most uninformed and insensitive among us that this housing demands that it be contiguous with the scale and texture (if not the density) of its adjoining and surrounding neighbourhood.</p> <p>The pattern of attenuating the height, volume, density and scale of the City Centre towards a domestic scale at the suburban edges is one which is imminently reasonable and practicable at every conceivable level, but here we have once again the planners capitulating to the developers in allowing this unimaginably inappropriate, random and out of character insertion of two 8 story blocks into this housing scheme. Quite apart from ignoring and militating against the texture and scale of the new, as well as the existing built environment, these blocks embody a form and style of living quite different from, and in conflict with, that of the planned low scale dwellings. Moreover by overlooking them deprive the townhouse residents of privacy.</p> <p>The insertion of these towers into this scheme would be just one more nail in the coffin of the splendid capital city which Canberra might have become.</p>

Submission no.	Submitter name	Submission
23	Luisa Capezio	<p>Please find herein my feedback and objection to the proposal to build two eight-storey apartment blocks on the ex-CSIRO site.</p> <p>Design and quality</p> <p>These proposed eight-storey buildings on this site appear to be inconsistent with the sites identified as suitable for urban densification as set out in the ACT Planning Strategy.</p> <p>The decision to sell this land and subsequently rezone to achieve a high-density RZ5, places greater emphasis and need to design quality, healthy and livable residential buildings. The ACT government and the NCA should be held accountable to the Territory Plan and associated rules and criteria's, and not what appears to be the desires of the developers.</p> <p>Consultation process</p> <p>While Purdon and DOMA representatives engaged at two community meetings, it was clear from the outset their presentation was a mere formality. Purdon disregarded the community feedback, specifically concerns or request for detail on traffic management and parking. During this period it was allegedly suggested that if the proposed design was rejected, then the developer would revert back to a higher density building design. This insinuation alone, if correct, is completely unethical but sadly not uncommon (quote 71 Constitution Ave, Campbell). What was also apparent in these consultation processes was the dismissive response to traffic, public safety and parking in the development.</p> <p>Building height</p> <p>I am objecting to the proposed height of these two buildings and suggest it is completely out of step with the character and developments along Limestone Avenue. It remains unclear if the proposed plans are within the 21.5m height cap. To achieve the proposed number of storey's and stay within the mandated height will require further detail.</p>

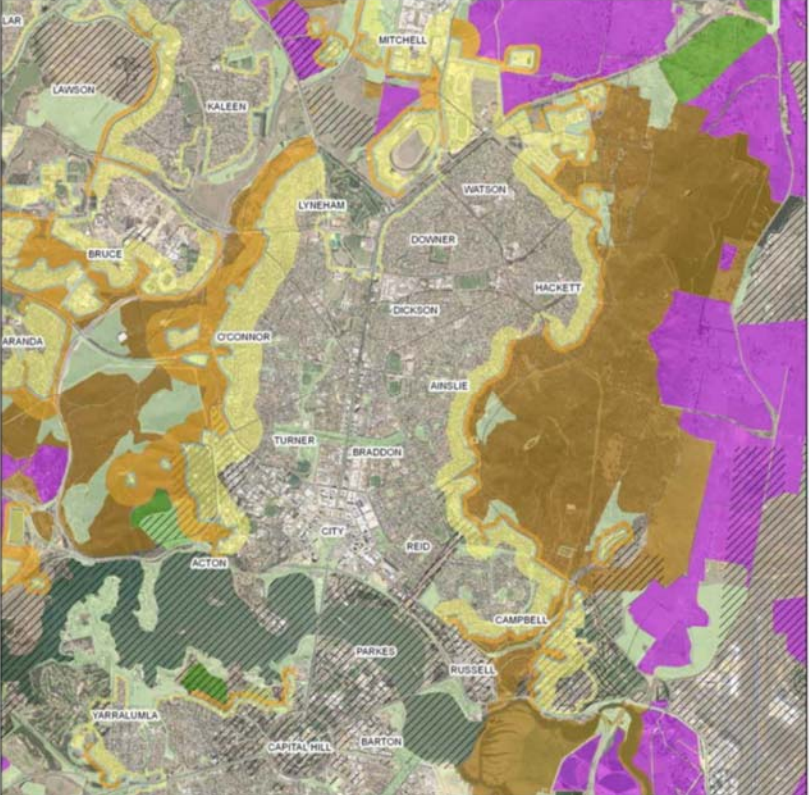

Submission no.	Submitter name	Submission
		Overall, this proposal should not be approved due to insufficient detail (1) confirming the height remains within 21.5 meters and (2) the concept plan is compliant with the Territory Plan and (3) suggesting this plan is in character with the surrounding residential, community and commercial surrounds.
24	Reid Residents' Association	<p>Thank you for the opportunity to provide comment on the proposed Concept Plan and a revised Development Control Plan (DCP) to guide the development of Blocks 4 and 5 Section 38 Campbell (the site).</p> <p>Reid Residents' Association (RRA) makes the following recommendations:</p> <ul style="list-style-type: none"> • Repositioning and lowering the height of the proposed twin towers • Incorporating the site's considerable assets/site features of mature trees and extraordinary rock formations into future landscaping • Increasing the setback to enable deep-rooted plantings of many trees • Extending the opportunity for genuine engagement/consultation with the community to achieve a development more apposite to the site <p>We, as neighbours, cannot see that the Concept Plan and DCP optimise the potential of the location and place, landscape and topography of this magnificent site.</p> <p><i>Location and place</i></p> <p>This site is located adjoining the suburbs of Campbell, Reid and Ainslie. These are mainly low-rise residential suburbs zoned RZ1 with 2 storey height limits. The exception to this occurs along Ainslie Avenue zoned at RZ4 i.e. medium density with buildings generally of 3- storeys, and part of Cooyong Street on the site of former Bega Flats zoned CZ5 i.e. Mixed- Use Zone where buildings may be constructed to 12 storeys. The latter, of course, reference the height allowable in the inner-city core of Civic NOT the residential areas of Reid and Ainslie.</p> <p>Constructing 8-storey buildings along Limestone Avenue does not acknowledge the character of this location and place i.e. the prevailing low built-form of the surrounding area. Twin towers of the proposed</p>

Submission no.	Submitter name	Submission
		<p>height are out of proportion to the scale of these immediately adjacent suburbs. We note the text changes from DCP 16/01 to DCP 19/XX with its attendant loss of important detail. The reality of the proposed 'scale' of 8-storeys does not 'reflect adjacent residential development and community facilities' but actually eclipses these suburbs and imposes on the approach to the Australian War Memorial and Anzac Parade.</p> <p>The retention of 'Provide allowance for buildings with an appropriate scale in relation to adjacent residential development and community facilities along Limestone Avenue' is the much-preferred wording for the DCP. In the current situation, the appropriate scale would be regarded as 3 to 4 storeys. Adjusting for topography the height of the twin towers could be viewed from various view points as being effectively 11 storeys. The combined bulk of such visual impact gives even greater cause for concern.</p> <p><i>Landscape and topography</i></p> <p>Currently, and for many decades, the site has had the appearance of a grassy woodland, albeit with some introduced trees and shrubs. Originally zoned for community use with an overlay of science, the building of the former CSIRO Headquarters (architects McConnel, Smith & Johnson) did not appear to impose on the site.</p> <p><i>Carefully sited within the landscape setting to avoid the rocky outcrops, and set back from the main road, Building 1 presents as a dominant structure, yet is partially hidden and screened by the surrounding trees.</i></p> <p>www.nca.gov.au/sites/g/files/net791/f/consultation/WA%20c38%20Campbell%20Heritage %20Report.pdf</p> <p>While the suburb of Reid epitomises the Garden City concept, RRA appreciates the natural 'bush capital' aesthetic typified by the slopes of Mt Ainslie. The proposed razing of the site of its well-established trees, shrubs and rocks, including remnant Ainslie Volcanics, again fails to optimise the potential of the site.</p> <p>We note, and appreciate, the proposal to locate low-rise dwellings on the higher slopes of the site even if solar access appears not to be a guiding principle. Surely, if careful siting of buildings was possible in the 1970s it is entirely feasible to repeat such an approach half a century later. The trees, contours and</p>

Submission no.	Submitter name	Submission
		<p>stunning rock formations should be regarded as high value elements and be integrated with the landscape rather than impose on the site yet another example of clichéd landscaping.</p> <p>The view from the site will, of course be stunning. The views of the site, devoid of its naturalising vegetation after clear-felling, sadly will be considerably diminished, particularly when dominated by what appear to be such formidable twin towers. Further, the proposed twin towers, whether 8 or 11 storeys, will compromise view corridors and even dwarf the Australian War Memorial, surely an unintended and perverse consequence. Should even the view from the air be dominated by the bulk of these twin towers?</p> <p>Further, the Concept Plan and DCP, fail to establish that the unique landscape and topography provide the very basis for inspiring building design that not only respects but that is sympathetic to the site. A concept plan and DCP that repositions the twin towers away from Limestone Avenue, that lowers the towers' height and that works with contours, solar access and other characteristics or parameters of the site, should be given serious consideration.</p> <p>Screening by trees will unfortunately take many decades to remediate what will be a scarred landscape. Under the increasing effects of climate change a set-back of 15 metres is insufficient for the appropriate numbers of deep-rooted trees to thrive and contribute to the landscaping of the site. Even in the fullness of time such trees will only be high enough to screen the lower half of these proposed towers.</p> <p>The RRA, therefore, strongly endorses the points made by the National Capital Design Review Panel May 2019 critique:</p> <p><i>1.2 The panel previously expressed concern for the inherent qualities of the site that have not yet been realised in the proposed landscape design, specifically retention of the large remnant eucalypts, management of the level changes and the existing limestone outcrops. This issue remains as it is considered an important consideration at the concept plan stage. The panel recommends that the proponent further explore opportunities to integrate these existing site features as part of the common open space network. Ensuring that key features of the site are better integrated with the broader design of the proposal will result in a greater contextual response for the proposal.</i></p>

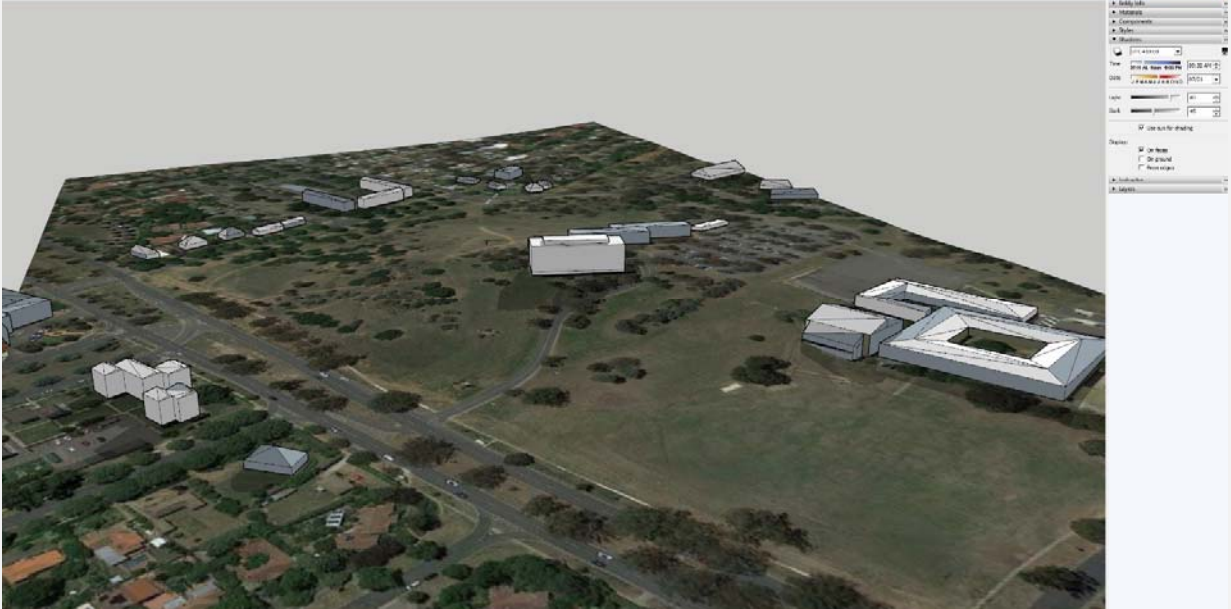
Submission no.	Submitter name	Submission
		<p data-bbox="701 328 1942 528"><i>2.4 The panel support the proposal of additional native trees to be planted informally at the edges of the site and outside of the block boundary to ‘soften’ the edges of the site and provide a transition between the external landscape context and the site. The panel would anticipate native tree species capable of growing to a scale of between 15 and 20m and which integrate the site with its surroundings. Similarly, the panel supports the proposal to integrate a variety of fence treatments at the edges of the site to provide some transparency and visibility into the development.</i></p> <p data-bbox="701 555 1767 616">www.nca.gov.au/sites/default/files/consultation/National%20Capital%20Design%20Review%20Panel%20-%20Panel%27s%20Critique%20-%202022%20May%202019.pdf</p> <p data-bbox="701 659 1926 754">Further, razing the current vegetation will also mean loss of communities that do still include endangered species. The EPBC reports would appear to overlook this consequence. Environmental offsets to mitigate loss of species and communities are acquiring an increasingly dubious reputation.</p> <p data-bbox="701 778 981 802">Further considerations:</p> <p data-bbox="701 831 1942 892">Have the relevant and appropriate Aboriginal people i.e. Ngunnawal, Ngunawal and Ngambri people, been genuinely consulted?</p> <p data-bbox="701 916 786 940">Traffic</p> <p data-bbox="701 968 1942 1029">Limestone and Ainslie avenues will obviously be impacted and Allambee, Coranderrk and Euree streets will also be subjected to increased traffic flow. How is this to be managed and ameliorated?</p> <p data-bbox="701 1053 752 1077">Fire</p> <p data-bbox="701 1106 1926 1201">Under increasingly dynamic and intense climate conditions what fire protection is proposed for this area? Please see Attachment 1. North Canberra Fire Management Zones. This clearly marks the site being directly adjacent to the Ember zone.</p> <p data-bbox="701 1225 1021 1249">Consultation/Engagement</p>


Submission no.	Submitter name	Submission
		<p>It is unfortunate that the consultation/engagement processes followed were, in reality, information delivery sessions. The Commonwealth Fair Work Ombudsman Stakeholder Engagement Strategy provides a useful and contemporary framework and principles for stakeholder engagement that could be taken into consideration for progressing the Concept Plan and DCP for this site. Please see Attachment 2.</p> <p>The RRA will look forward to having the opportunity to provide further input to achieving a more creative development in keeping with this magnificent site.</p> <p>Attachment 1: North Canberra Fire Management Zones</p> <p>http://www.esa.act.gov.au/wp-content/uploads/2011/08/act-sbmp-ember-zones-central-canberra.pdf</p>

Submission no.	Submitter name	Submission
		 <p data-bbox="1534 331 1702 518">  Strategic Bushfire Management Plan 26/09/09 </p> <p data-bbox="1534 542 1702 1093"> Fire Management Zones 2009 to 2014 <ul style="list-style-type: none"> ■ Ember Zone ■ Inner Asset Protection Zone ■ Outer Asset Protection Zone ■ Strategic Firefighting Advantage Zone (ACT Government Land or NSW) ■ Strategic Firefighting Advantage Zone (Leased Land) ■ Agricultural Fire Management Zone ■ Landscape Fire Management Zone Cooperative Management Area ACT Border </p> <p data-bbox="705 1149 1937 1284"> Attachment 2: Fair Work Ombudsman (FWO) Stakeholder Engagement Strategy extract ‘Stakeholder Engagement Strategy’, Version 1.2, July 2019, https://www.fairwork.gov.au/.../fairwork-ombudsman-stakeholder-engagement-strate... </p>


Submission no.	Submitter name	Submission
		<p>The FWO values the expertise, knowledge and experience that stakeholders contribute and we aim to harness this to ensure we make the best informed decisions in relation to our strategic priorities, policies and operations. We are open to different views, needs and expectations to continuously improve and better target our work.</p> <p>The FWO is committed to building relationships with stakeholders and the community based on trust and respect to increase our impact in the community and achieve quality outcomes (p. 2).</p> <p>Further, to progress the concerns raised by the community regarding Campbell 38, the following engagement principles (p. 5) would be useful:</p> <ul style="list-style-type: none"> • Purposeful and effective • Inclusive • Timely and responsible • Transparent and accountable • Respectful.
25	Marcus Hipkins	<p>My comments in relation to the proposed development are:</p> <ul style="list-style-type: none"> • The traffic impact assessment report is inadequate for the following reasons: <p>The SIDRA analysis for the PM Limestone Ave / Ainslie Ave intersection states that the number of vehicles making a right turn from Ainslie Ave to Limestone Ave will increase from 174 vehicles to 334 vehicles while also stating that the delay associated with this turning movement will decrease from 62.5 seconds to 59.3 seconds. I find it quite remarkable that a near doubling of vehicles making this turn would result in a lower delay and suggest that the figures in this report need to be independently checked. In any case, this turning movement is one of the major approach routes for the proposed development and, according to the analysis presented, is operating at an unacceptable level of service E.</p> <p>Page 15 of the report states that most of the vehicles accessing the site from the east will choose to route via Corranderrk Street and Cooyong Street however the report contains no analysis of intersections along</p>

Submission no.	Submitter name	Submission
		<p>these streets. The ACT Guidelines for Transport Impact Assessment states that all road links within 2km of a development of this size should be studied.</p> <p>In addition, as an Ainslie resident I always use Fairbairn Avenue over Parkes Way when travelling from Majura Park, the airport, Fyshwick, Queanbeyan and similar areas. The assumption on page 15 that “the only origin area in the ACT that would be likely to access the site from Fairbairn Avenue is Campbell based traffic” is false. There are a number of traffic lights on Corranderk Street and Cooyong Street which cause significant delays and are best avoided. I think that the access arrangements proposed for the development have a very high risk of causing significant rat running through residential streets of Reid and these issues need to be studied properly.</p> <p>The report fails to discuss the turning moments at the AM Limestone Ave / Treloar Crescent / Euree Street intersection currently operating at level of service E or F and fails to discuss the additional delays that the development will cause in relation to these turning movements. This intersection is adjacent to a school and has a high accident rate.</p> <p>The report fails to consider the impact of the loss of the school drop-off point currently on the site of the proposed development.</p> <p>The report fails to consider the loss of the cycle and pedestrian access for school students between the school and southern Ainslie.</p> <p>The report fails to give special consideration to students attending the school who are likely to have lower levels of road spatial awareness.</p> <ul style="list-style-type: none"> • I found the plans and illustrations generally unhelpful in visualising the scale of the development in relation to the surrounding area so I prepared my own sketch which includes the immediately surrounding buildings (see attached). Based on this sketch I do not think that the scale of the proposed development is appropriate considering the adjacent residential developments and community facilities.

Submission no.	Submitter name	Submission
		<ul style="list-style-type: none"> • The changes proposed to the Development Control Plan are clearly designed to accommodate the proponent's proposed development and weakens the Plan in a number of areas including overshadowing, overlooking and building scale. The proposed changes are at odds with the name and function of a Development Control Plan. • My general impression of the development is that it exceeds the boundaries of what is socially acceptable for this site and displays little imagination and creativity. I do not believe this is a development that will enhance the local area and has the potential to create significant problems. I therefore can see no reason to support the development or the proposed changes to the Development Control Plan.  <p>The image shows a 3D architectural rendering of a residential development. It features several large, modern-style houses with flat roofs and light-colored facades, interspersed with greenery and trees. A road with a median runs through the site. The rendering is viewed from an elevated perspective. On the right side, there is a software interface with various panels and controls, including a 'Layers' panel, a 'Properties' panel, and a 'View' panel, indicating that this is a screenshot from a 3D modeling or rendering software.</p>

Submission no.	Submitter name	Submission
		
26	Shane Mortimer	<p>It has been suggested throughout repeated documentation regarding the ex CSIRO HQ site that there are no places or objects within the site identified as reflecting Aboriginal cultural or historical values. The Purdon Planning Doma analysis and EPBC are in fact severally flawed in examining this assumption that the site has no Aboriginal significance because it simply has not been currently included in the Commonwealth Heritage listing under the EPBC Act.</p> <p>It well known that Mt Ainslie, the Foothills and Corroboree Park has tremendous significance by all local Aboriginal groups and is known for select vegetation on the Mountain itself which is agreed to by all clans as “Women’s business”. The nearby Corroboree Park and Foothills have extremely high relevance to the Aboriginal Heritage.</p>

Submission no.	Submitter name	Submission
		The Foothills and boulders area are a most significant Aboriginal cultural corridor with the descendant of John Ainslie and his Aboriginal partner (then guide for Ainslie) being my direct descendants. It is well known that the site of Ainslie's first camp was Corroboree Park. Corroboree Park was the place of shelter that provided shade and water on the surrounding treeless Limestone Plain.

Submission no.	Submitter name	Submission
		 <p data-bbox="703 1232 1814 1264">Ainslie Volcanic outcrops clearly seen on the treeless Limestone plain, view from Mt Ainslie</p>

Submission no.	Submitter name	Submission
		<p>Just as the Corroboree tree in Corroboree Park has been placed on the ACT Heritage register https://www.tccs.act.gov.au/__data/assets/pdf_file/0005/474989/Ainslie-PTR118.pdf the Commonwealth needs to Act and ACT Heritage as well to place the Ainslie volcanic boulders on the Commonwealth Heritage Listing as Aboriginal heritage cultural corridors and extremely significant cultural places.</p> <p>The fact that the developer has given the title “Foothills”, itself shows the impact that the development would have on this significant site. The EPBC ruling that the entire site can be developed and all vegetation removed including the known endangered species and last remnants of grassland in close proximity to the CBD is vandalism in the eyes of many, not only Aboriginal and is extremely flawed and needs overturing and re-examination.</p> <p>The ACT Government as well has in fact had a flawed analysis of an earlier application to have the Ainslie volcanics heritage listed (please see attached). The boulders should have the same relevance as the registering of the community concerns for conservation as the Corroboree tree. The fact that the Ainslie volcanic outcrops have not had the same Heritage registration as the Corroboree tree requires urgent revision by both the Commonwealth and the ACT Governments.</p> <p>The community request to have the Ainslie volcanic boulders heritage listed was before any site development was suggested. The ACT Heritage Council assessment, incorrectly made the assumption that all of the site was Commonwealth land when a great percentage of the outcrops are on land under ACT control making the following incorrect statement regarding Heritage listing in 2013 by stating :</p>

Submission no.	Submitter name	Submission
		<p style="text-align: center;">STATEMENT OF REASONS</p> <p style="text-align: center;">DECISION NOT TO PROVISIONALLY REGISTER CSIRO LIMESTONE AVENUE BOULDERS (Block 4 (part) Section 38, Campbell) IN THE ACT HERITAGE REGISTER</p> <p>The Council has decided, at this stage, not to enter CSIRO Limestone Avenue Boulders, Campbell, in the ACT Heritage Register because:</p> <p style="text-align: center;">The place is located on National Land, and as such the <i>Heritage Act 2004</i> does not have direct effect.</p> <p>The Council has not formed a view about the heritage values of this place.</p> <p>The Council will encourage the Commonwealth to assess the potential heritage values of this place and, if justified, to recognise and protect the place.</p> <p>Both the failure of ACT Heritage and the EPBC to analyse the Aboriginal significance of the site demonstrates the ongoing subjugation of Aboriginal lands and heritage and the proclivity to exclude.</p> <p>As a direct descendant that can prove DNA links and heritage as well as Allodial title where has been the compliance to Ask first? http://www.nrm.wa.gov.au/media/86488/ask-first.pdf Under the provisions of the Commonwealth Aboriginal and Torres Strait Islander Heritage Protection Act 1984, an assessment of all impacts under the EPBC Act must comply with the Significant Impact Guidelines 1.2 (Actions on , or impacting upon, Commonwealth land and actions by Commonwealth agencies, 2013), which includes consideration of Aboriginal and Torres Strait Islander Heritage values.</p>

Submission no.	Submitter name	Submission
		<p>Definitions</p> <p>Indigenous heritage is dynamic. It includes tangible and intangible expressions of culture that link generations of Indigenous people overtime. Indigenous people express their cultural heritage through ‘the person’, their relationships with country, people, beliefs, knowledge, law, language, symbols, ways of living, sea, land and objects all of which arise from Indigenous spirituality.</p> <p>Indigenous heritage places are landscapes, sites and areas that are particularly important to Indigenous people as part of their customary law, developing traditions, history and current practices. All Indigenous heritage places have associated Indigenous heritage values. Indigenous heritage values include spirituality, law, knowledge, practices, traditional resources or other beliefs and attachments.</p> <p>The precautionary approach is taken where an activity involves a risk of significant irreversible damage to a place. Uncertainty about heritage values at the place should not be used as justification for proceeding with that activity. This approach should be used when there is uncertainty or debate over the significance of a place to ensure that heritage values are not damaged.</p> <p>None of the “Ask First” issues have been addressed other than in a perfunctory way.</p> <p>Reconciliation and remediation</p> <p>This land has been here since millennium and the brutality shown in the last 100 years especially in the last decade with rampant development must stop now and these measures undertaken:</p> <ul style="list-style-type: none"> • The site be rezoned to a new classification being Aboriginal heritage • Renaming of Mt Ainslie • Immediate remediation of the site to return to pre 1920 traditional ownership and land care adopted i.e Removal of massive rabbit and warrens, controlled burns and protection of grassland • A Custodian for the site appointed

Submission no.	Submitter name	Submission
		<ul style="list-style-type: none"> The establishment of a First people walking track and heritage trail encompassing Corroboree Park, the Foothills, Mt Majura and Mt Ainslie reserves that explains the history and culture and protects and respects the First peoples beliefs and law.
27	Margaret Dudley	<p>I would like to submit some comments regarding the development of the old CSIRO site on Section 38 of Campbell. I am a long time resident of Campbell and have concerns about what is proposed for the site and its impacts on the surrounding suburbs and increased traffic associated with the development. Below is a summary of these concerns:</p> <ul style="list-style-type: none"> The old CSIRO building, due to the colour and its setback from Limestone Avenue and Quick Street was unobtrusive and did not impact on the view to Mount Ainslie or the characteristics of the suburb bordering it. This can not be said of the two eight storey apartment buildings on Limestone Avenue planned for this site. The site is bordered by low rise residential suburbs and high rise apartment blocks would be totally out of character and out of scale with its surroundings. I understand that the development will be ceded to the Territory government in the future and therefore it is only logical that the development complies with the Territory Plan. As it stands, there has not been enough detail provided to determine if this is the case. The traffic issues arising from funnelling vehicles from 132 townhouses and 104 apartments (given that most residents will have two vehicles) has not been satisfactorily addressed. Limestone Avenue is already a busy thoroughfare, particularly at peak times. The traffic congestion caused by this increase in road users is of particular concern. <p>I do not have the expertise to thoroughly go through all the documents relating to this development, however I believe that is what a meaningful public consultation process should address - letting the community know, in plain language, what is planned so that they are able to understand what sort of impact it will have on them and the character of their suburb with the ability to have their concerns heard and taken into account early in the planning process. I maintain that this has not been satisfactorily done.</p> <p>The old CSIRO site is a wonderful site. It should be used for something architecturally exceptional, not the cookie cutter developments that are more about maximising profit rather than providing something</p>

Submission no.	Submitter name	Submission
		environmentally sympathetic that people actually want to live in. I hope the NCA planning team ensures this is the case.
28		<p>The North Canberra Community Council endorses the concerns raised in the submission provided by Jane C. Goffman of Active Planning:</p> <ul style="list-style-type: none"> • Poor consultation • The high level of complexity of the project, which acts as a deterrent to engagement • The traffic and road safety impacts. In addition, road impact Statement is based on 2011 data. This is fundamentally out of date with all the large traffic growth traffic now going to Majura Park/Airport • Social, heritage and environmental impacts. <p>We believe that the proposal should not proceed until those concerns are addressed.</p>
29	ACT Government Environment, Planning and Sustainable Development Directorate	<p>Please accept the following key considerations and attached comments as the ACT Government public submission about DCP16/01 and the Concept Plan.</p> <p>As a key stakeholder in the future development of the site I request that you consider this ACT Government submission in finalising the amendments to the Development Control Plan and the Concept Plan. I was disappointed that the initial DCP 16/01 was approved prior to the lodgement or consideration of the ACT Government submission about this important development site and proposal.</p> <ol style="list-style-type: none"> 1. Emergency access/egress -The site has one point of access via Limestone Avenue. In this regard, ACT Fire and Rescue recommends exploring alternative access points. This would improve general site access but is most important for emergency situations. In an emergency, a single point of access is likely to create traffic congestion for emergency vehicles attempting to access and protect the site at the same time that occupants are seeking to evacuate. 2. Bushfire protection -ACT Fire and Rescue is seeking clarification of the asset protection zones (APZs) for the site and surrounds. Currently the bushfire assessment report relies on the APZs being

Submission no.	Submitter name	Submission
		<p>established and maintained external to the site in perpetuity. The formal agreement of the affected land manager would need to be gained in order for these APZs to be utilised as the basis of bushfire protection. Alternative APZs could be introduced within the boundary of the site. Transport Canberra and City Services (TCCS) is the adjoining land manager.</p> <p>Natural Temperate Grasslands - The DCP appears to be at odds with condition 4 of the Environment Protection and Biodiversity Conservation (EPBC) legislation approval. The draft DCP requires that Landscape zones 2 and 3 " shall be well landscaped with a mixture of trees and/or shrubs appropriate to the landscape character of the surrounding area". While the EPBC approval condition 4 requires " ... a (1m) buffer zone of species associated with natural temperate grassland along the northern boundary with Block 4 Section 63, Campbell ACT to minimise impacts to protected matters during the occupancy phase."</p> <p>There are concerns that the proposed landscaping could 'out compete' and overshadow the grassland species which are shade sensitive. Accordingly, it is appropriate for those parts of the proposed landscape zones 2 and 3 abutting the natural temperate grassland on the adjoining land, to be landscaped using natural temperate grassland species in a way that is sympathetic to the conservation, functioning and landscape character of that grassland community. If done properly it is likely that grassland wildlife would utilise and move to and from planted species and the adjoining grassland.</p> <p>These issues are detailed in full at Attachment A. Also included at Attachment A, is a range of other comments and relevant requirements of the various ACT Government agencies in planning for the future development of the site. These include:</p> <ul style="list-style-type: none"> • Contaminated land assessments and approvals by the ACT Environment Protection Authority • Water supply with capacity for emergencies on site as requested by Icon Water • Stormwater management options including retardation basins • Landscape zones – encroachments and deep root plantings to minimize urban heat island effects. <p>ACT Fire and Rescue has also provided general advice relevant to future development on the site for your consideration at Attachment B.</p>

Submission no.	Submitter name	Submission
		<p data-bbox="701 328 869 352"><u>Attachment A</u></p> <p data-bbox="701 379 1473 403">1. Access/Egress - bushfire, structure fires and emergency vehicles</p> <p data-bbox="701 430 1921 595">ACT Fire and Rescue has concerns about the proposed single access to the site. This is likely to result in traffic congestion and access issues for responding emergency service vehicles attempting to access/protect the site at the same time that occupants are seeking to evacuate. Given that the site is located on bushfire prone land there is a likelihood that this could occur for any bushfire event or equally for a major structure fire within the site.</p> <p data-bbox="701 622 1877 683">ACT Fire and Rescue recommends exploring alternative access opportunities to improve site access in general and for emergency situations.</p> <p data-bbox="701 710 1122 734">2. Bushfire protection requirements</p> <p data-bbox="701 761 1030 785">Bushfire assessment report</p> <p data-bbox="701 812 1906 906">ACT Fire and Rescue has reviewed the bushfire assessment report DG180117 _ BRAC-Report_ Sep18 - prepared by Bushfire Protection Planning & Assessment Services Pty Ltd and concur with its findings and recommendations including the provision and specifications of:</p> <ul data-bbox="752 933 1928 1102" style="list-style-type: none"> <li data-bbox="752 933 1400 957">• Asset Protection Zones (Temporary and Permanent) <li data-bbox="752 970 972 994">• Water supplies <li data-bbox="752 1007 1928 1067">• Specific bushfire construction requirements for structures, including the use of alternate solutions to reduce bushfire attack level (BAL) ratings <li data-bbox="752 1080 1370 1104">• Any other ACT Fire and Rescue recommendations <p data-bbox="701 1129 976 1153">Asset protection zones</p> <p data-bbox="701 1181 1921 1241">Clarification is sought about the asset protection zones (APZ) proposed for the site. Currently the bushfire assessment report relies on the APZs being established and maintained external to the site in perpetuity.</p>

Submission no.	Submitter name	Submission
		<p>Formal agreement of the land management would need to be gained in order for these APZs to be utilised as the basis of bushfire protection. Alternative APZs could be introduced within the boundary of the site.</p> <p>Asset protection zones (APZ) assist with bushfire risk mitigation in the urban area by reducing the impact of embers, radiant heat and flames on properties. APZs also provide access for firefighters (and their vehicles) to conduct fire suppression activities and provide space to evacuate if required.</p> <p>APZs are required to be maintained as per the ACT bushfire management standards (2014) Table 4 (Pg. 4) which is available via the following link: https://esa.act.gov.au/about-esa/publications/strategic-bushfire-management-plan</p> <p>3. Natural Temperate Grasslands</p> <p>The Environment Planning and Sustainable Development Directorate previously advised the National Capital Authority of the highly significant patch of Natural Temperate Grassland (NTG) that partly lies within the land subject to the DCP and partly within adjoining land to the north. This native grassland is listed nationally as critically endangered and is known habitat of the critically endangered Golden Sun Moth. Due to the presence of these features the proposal had to be referred for approval under the Environmental Protection Biodiversity Conservation Act 1999 (EPBC). Approval was subsequently given subject to a series of conditions.</p> <p>The draft Development Control Plan (DCP) does not mention the presence of adjoining NTG nor does the draft DCP consider that natural grassland is part of the adjoining landscape.</p> <p>It is a significant issue that the DCP appears to be at odds with condition 4 of the EPBC approval. The draft DCP requires that Landscape zones 2 and 3 u •••• shall be well landscaped with a mixture of trees and/or shrubs appropriate to the landscape character of the surrounding area". While condition four requires" ... a {1m} buffer zone of species associated with NTG along the northern boundary with Block 4 Section 63, Campbell ACT to minimise impacts to protected matters during the occupancy phase." Trees and shrubs are only very rare elements in NTG so it is difficult to see how any plantings of woody species (and the DCP allows for exotic plantings) could be appropriate to the landscape character of the surrounding grassland.</p>

Submission no.	Submitter name	Submission
		<p>It is also difficult to see how such landscaping would allow for the buffer of species from the NTG community, which by their nature are sensitive to shading.</p> <p>The proponents planning document does say that in line with EPBC condition 4 a fence and 1m grassland buffer will be established around the northern edge, but this is missing from the draft DCP and their landscape plans show almost complete shading of this buffer area. In addition, the landscape plans indicate that the drip line of trees at maturity will impinge over NTG outside of the DCP area.</p> <p>4. Contaminated land</p> <p>Given the potential for contamination from past activities at the site and the proposed change in land use, an intrusive environmental assessment (and remediation if required) must be undertaken at the site to determine whether these past activities have impacted the site from a contamination perspective, and to determine whether the site is suitable for the proposed and permitted land uses.</p> <p>All assessment and remediation works must be independently audited by an Environment Protection Authority (EPA) accredited contaminated land auditor and the findings of the independent audit into site suitability reviewed and endorsed by the ACT EPA prior to the transfer of land from the Commonwealth to the Territory and prior to a change of use at the site.</p> <p>5. Water supply</p> <p>The existing water network has sufficient capacity to provide the required flow. However, Icon Water requires a water feed with capacity for emergencies. Both ACT Fire and Rescue and Icon Water have raised concerns that the proponent only proposes 'DN150 water feed' to the development. This does not allow for any contingency for an emergency including a bushfire or structure fire within the site. A water supply of higher capacity is required by Icon Water.</p> <p>Buildings greater than 3 storeys in height are considered to be a higher residential fire risk and are classified fire risk type 'F4' for water supply purposes. Both ACT Fire and Rescue and Icon Water have concerns that the development only proposes</p>

Submission no.	Submitter name	Submission
		<p>'DN150 water feed' to the development. This does not allow for any contingency for an emergency.</p> <p>Due to the potential of fires occurring within rear lanes and unit complexes, and the inability to access hydrants from the street front, ACT Fire and Rescue policy requires hydrant provision for rear lanes and unit complexes be consistent with the fire risk classification of the development.</p> <p>The location of hydrants in rear lanes and unit complexes should be designed to comply with Australian Standard 2419.1-2005. Performance based solutions for water supplies may also be accepted but will require in principal support from ACT Fire & Rescue Fire Safety Section.</p> <p>6. Stormwater</p> <p>There are identified stormwater and flooding problems at Limestone Ave near Quick Street. The land near the intersection of Quick St and Limestone Ave on the subject site presents an opportunity to manage and possibly solve this flooding issue through the construction of a retarding basin. There is a significant catchment area upstream and drainage depressions adjacent to Quick Street and the gazetted but not constructed Wolseley Drive reservation leading up to the Mount Ainslie cut-off drain.</p> <p>7. Landscape Zones</p> <p>Soft landscaping is known to be a cost-effective measure in helping to reduce the urban heat island effect, which is where pavements, roads and buildings absorb the sun's heat and radiate it back day and night, leading to increased temperatures and stopping the city from cooling down. This effect is becoming a greater problem as climate change causes warmer weather and more extreme temperatures. Therefore, soft landscaping, as well as permeable surfaces should be maximised to lessen this effect.</p> <p>In section 3 of the revised Development Control Plan 19/01, minor encroachments of building elements may be located within the landscape zones (zones 1, 3 and 4) where they contribute to the articulation of the building form. The term building</p>

Submission no.	Submitter name	Submission
		<p>elements, or minor building elements should be clearly defined for clarity and to ensure only suitable elements are included within these zones. It is unclear why the term 'building' has been defined within these sections and therefore should either be deleted or further clarity provided.</p> <p>Landscape Zone 1 is to have a mixture of native and exotic plantings, which previously was to consist of 'a continuous canopy of deep rooted trees and shrubs endemic to the ACT'. There is concern with the deletion of the words 'deep rooted trees' and these should be reinstated.</p> <p>Landscape Zone 2 allows for 'structures such as a pool and associated recreation facilities and amenities are permitted in this area'. The term 'associated recreation facilities and amenities' is ambiguous and it is requested that this be made more explicit by including exclusions, such as built structures.</p> <p>Similarly, Landscape Zone 3 allows for 'considered intrusions permitted for articulation'. Again, this term is ambiguous and greater clarification and definition could be provided.</p> <p>It is noted that canopy tree planting within Landscape Zones 2 and 3 do not appear to accord with the EPBC approval conditions. It is requested that the plans be amended to explicitly demonstrate compliance, and ensuring that any canopy tree planting in these zones are not located within and will not shade the buffer zones.</p> <p>It is requested that point 7 of the Landscape Structure Section within the Urban Design Principles table in the report be updated to state 'deep soil zones exclude building footprint and foundations, basement car parks, services, swimming pools, tennis courts, other building elements and impervious surfaces including car parks, driveways and roof areas'.</p> <p>There is concern that the basement servicing the apartment buildings extends well into the front setback of the building and will greatly limit the potential for deep soil tree planting and provision of permeable surfacing in this area. It is suggested that the basement plan be revised so as not to extend within the front setback, for which there seems to be ample opportunity, given the footprint of the two apartment buildings.</p>

Submission no.	Submitter name	Submission
		<p>There is no or limited capacity for canopy trees and or vegetation to be provided in the primary open space areas of the townhouses.</p> <p>8. Sustainable design</p> <p>Consideration should be given to integration of sustainable measures that will help to reduce greenhouse gas emissions and provide high energy efficiency. Matters to consider include:</p> <ul style="list-style-type: none"> • Transport - provision of electric vehicle charging stations on-site • Waste - stream sorting, provision of on-site composting • Stationary energy- transition away from gas for heating, cooking and cooling systems (HVAC) • Buildings - construct new buildings that are fit for purpose for the future warmer/dryer climate, including high energy efficiency and low energy use specifications. Requiring environmentally sustainable design reports to be submitted with future applications will assist in achieving this • Power supply- consideration of localised power generation (e.g. rooftop solar panels) and battery storage to supplement capacity. <p>9. Electricity</p> <p>Evoenergy as no objection to the proposed development but indicates that the following matters should be considered in relation to any future development on the site:</p> <ul style="list-style-type: none"> • The proponent is required to contact Evoenergy prior to commencement of development to negotiate the connection or any proposed new, upgrades to or relocation of electricity assets. • All development is to comply with minimum clearance to overhead assets and minimum separation to underground assets • The existing high voltage network may require relocation under the proposed development work • The proponent may be required to provide space for a substation if there is existing supply available including the following: <ul style="list-style-type: none"> ○ Negotiate with Evoenergy as to the location of the substation

Submission no.	Submitter name	Submission
		<ul style="list-style-type: none"> ○ Any substation will require special earthing, if that substation is to be located within 100metres of a 'special location' (including child care centres, public pool etc) to less than 1ohm. <p>Although there is existing supply available for lighting, if the existing supply is not adequate for the new load anticipated by future development on the site, then the developer is required to contact: network.connectionadvice@evoenergy.com.au to investigate options for upgrading the supply.</p> <p>10. Sewer</p> <p>Icon water advises that the existing sewer network has sufficient capacity to deliver the full flow from the development proposed.</p> <p><u>Attachment B</u></p> <p>ACT Fire and Rescue requirements relevant to future development on the site</p> <p>ACT Fire and Rescue pumper requirements</p> <p>All roads and driveways for the development site are to be suitably constructed to allow the access and egress of fire fighting vehicles, crews and equipment.</p> <p>ACT Fire and Rescue pumpers require a minimum turning circle of 18 metres and weigh 14 tonne. The dimensions of an ACT Fire and Rescue urban pumper is 2.5m wide, 8.1m long and 3.2m high.</p> <p>Paths of travel that traverse over or are in close proximity to basement surfaces or water retention pits require pavement loading suitable for ACT Fire and Rescue emergency vehicle access/egress.</p> <p>ACT Fire and Rescue access requirements for rear lanes and unit complexes</p> <p>It is recommended that driveway access and rear lanes be constructed to provide vehicular access for emergency services in all developments where direct access is not available from the street front. This is particularly important where garaging and rubbish services etc. are intended to be provided within a complex or at the rear of properties.</p>

Submission no.	Submitter name	Submission
		<p>Minimum access standards for unit complexes and rear lanes intended to be trafficable for emergency vehicles are to be in line with the rear lane requirements of Estate Development Code, Table 2A: Street network requirements - all estates except in industrial zones, where:</p> <ul style="list-style-type: none"> • Minimum carriageway width of 5.5m (5.0m where the lane is <60m in length), with verge of 1.5m; • Pavement loading for driveways suit able to carry a 14 tonne appliance; • Minimum horizontal radius to accommodate a 12.5m single unit truck; • The carriageway width measurement is not to include any designated car parking spaces, cycling lanes, indented car parking bays or medians; • Maximum longitudinal gradient of 12.5%; and • On street parking is prohibited. <p>ACT Fire and Rescue access requirements for buildings greater than 3 storeys</p> <p>Where buildings are greater than 3 stories high, the "Bronto Skylift" aerial appliance may be required to access the upper levels in an emergency. The Bronto Skylift has the following dimensions:</p> <ul style="list-style-type: none"> • Length – 11.2m • Minimum height clearance – 3.9m • Width – 2.9m (with mirrors) • Weight – 30t, with point loads up to 11 Bars@ 21t on each out rigger (no ground plate) and 3 bars @21tonnes (with ground plate) • Minimum turning radius – 21m • Working footprint – 12 x 6.5m <p>Appropriate access and a working footprint is required to at least one corner of all buildings to give the Bronto Skylift access to two sides of a building. When set up, the Bronto Skylift requires a working footprint of 12m x 6.5m with a maximum gradient of 6 degrees and should not be further than 15m from the building wall. Potential point loads up to 21 tonnes (within surface area of 0.7 m2) may be applied by</p>

Submission no.	Submitter name	Submission
		<p>the ground pads, and must be taken into account for pavement loadings and particular care taken when in close proximity to basement or podium surfaces.</p> <p>ACT Fire and Rescue Compressed Air Foam System</p> <p>ACT Fire and Rescue Compressed Air Foam System (CAFS) 8000 fire appliances are specifically designed for the urban interface however can be used as a multi-functional vehicle. CAFS are predominantly used for asset protection from bushfire sources along the urban interface. The internal and perimeter roads of the development need to be designed to allow access for these vehicles. Specifications of Volvo FM9 CAFS 8000 is the larger of the two vehicles and has the following dimensions:</p> <ul style="list-style-type: none"> • Length – 10.5m • Width – 3.2m (with mirrors) • Height – 3.7m • Weight – 23 tonnes • Turning circle – 21.2m <p>All emergency access gates are to be fitted with standard Fire Brigade locks.</p> <p>Fencing in areas at risk of bushfire</p> <p>ACT Fire and Rescue supports the provisions identified in NSW Rural Fire Service Fast Fact 2/06 Dividing Fences in Bushfire Prone Areas.</p> <p>For sites rated as Bushfire Attack Level 12.S and 19, where a timber fence connects directly to a dwelling or has less than a minimum of 1m separation from the dwelling, then it is recommended that the fence be constructed using non-combustible material only. If the fence is over 1m from a dwelling then hardwood may be used. It is not recommended to use soft wood for timber fencing. Fencing for sites rated as Bushfire Attack Level 29 or above, should use non-combustible materials for fencing.</p>

Submission no.	Submitter name	Submission
		<p>In all cases where timber fences are proposed, care should be taken in the selection, location and maintenance of landscaping adjoining the fence. Unmanaged landscaping could promote fire activity due to ember, radiant heat and direct flame contact and further impact timber fencing.</p> <p>Reference: https://www.rfs.nsw.gov.au/resources/publications/building-in-a-bush-fire-area/fast-facts</p> <p>Landscaping in areas at risk of bushfire:</p> <p>Landscaping of residences within the site is to be managed to inner Asset Protection Zone standards as per Table 4 of the ACT Bushfire Management Standards (2014).</p> <p>Landscaping should also consider the principals detailed in Appendix 5 of NSW Planning for Bushfire Protection 2006 via the following link:</p> <p>https://www.rfs.nsw.gov.au/plan-and-prepare/building-in-a-bush-fire-area/planning-for-bush-fire-protection</p> <p>Landscaping can also be informed by the use of fire retardant plants - Yarralumla nursery Garden Advice series located on the following website:</p> <p>http://www.tams.act.gov.au/data/assets/pdf_file/0012/389937/Fire_retardant_plants_for_canberra.pdf</p> <p>Emergency Management and Evacuation Plan</p> <p>ACT Fire and Rescue recommends that a bushfire emergency plan be developed as a part of the overall emergency plan for the facility, and maintained for the life of the development. Compliance to the appropriate Australian Standard should be demonstrated for example AS3745 - Planning for emergencies in facilities.</p> <p>Hazardous Materials:</p>

Submission no.	Submitter name	Submission
		<p>Demolition and asbestos management must be undertaken in accordance with the Building Act 2004, Dangerous Substances Act 2004, Work Health and Safety Act 2011 and Work Health and Safety (How to Safely remove asbestos Code of Practice) approval 2014.</p> <p>Removal of asbestos or asbestos containing materials is to be conducted by appropriately licensed asbestos removal list.</p> <p>Information about demolition and asbestos management is available from the Access Canberra website or phoning 13 22 81. ACT Fire and Rescue request notification on commencement and completion of all significant asbestos removal. Notification can .be made to the ACT Fire and Rescue Communication centre on 62004111.</p> <p>Street Furniture, Landscaping and Tree Planting:</p> <p>ACT Fire and Rescue has the following requirements in relation to the location of street furniture, landscaping, existing trees and tree planting. The following should be observed:</p> <ul style="list-style-type: none"> • In ground and above ground hydrants, other water supplies and all services shut offs must not be impeded by street furniture, landscaping, trees or be covered by materials; • Hydrants should be clearly identified, easily accessible and not have vehicles parking over them; and • Street furniture, landscaping and trees must not impede the progress of emergency service vehicles attending the facility. The minimum height clearance for ACT Fire and Rescue vehicles is 4.5 metres. Site maintenance should include pruning of any overhanging branches over driveways and pathways. <p>ACT Fire and Rescue Fire Safety Section:</p> <p>Compliance to the National Construction Code and inbuilt fire safety systems are outside the scope of this document and will be assessed separately by ACT Fire and Rescue Fire Safety Section at the building approval stage.</p>

Submission no.	Submitter name	Submission
		All significant alterations and construction or extensions of buildings greater than 500m2 will require a fire safety review at the building application to ensure National Construction Code compliance.
30	ACT Government Transport Canberra and City Services	<p>Traffic Impact Assessment report claims that the proximity of the existing bus stops to the site are an acceptable walking distance and the existing infrastructure for the active travel paths to/from these facilities is also acceptable, it seems obvious that the road and current traffic volumes are barrier to pedestrian movement and a major deterrent to walking. Proponent to address these matters at the DA stage.</p> <p>TCCS understands that the current spacing of signalised intersections is too wide to provide an efficient pedestrian network and a significant proportion of crossing manoeuvres are likely to be made, or would want to be made, remote from these intersections. This includes access to/from bus stops as well.</p> <p>Whilst TCCS recognises that the slope in the median offers some difficulties, the consultant should at least be recommending where the deficiencies could potentially be remedied.</p> <p>It seems secondary access previously referred to original submission is removed from the revised one. We understand that an emergency access appears to be required by Emergency Service Authority. Proponent to discuss matter with ESA for an agreed location if need be.</p> <p>The current stormwater conditions in front of the proposed development on Limestone Avenue experiences road flooding from overland flow from the existing Blocks (Map Attached). To prevent further issues, stormwater on site should be managed by incorporating on-site detention. TCCS will through assess the stormwater plan at DA stage.</p> <p>At this stage, TCCS would like the existing street furniture and prunus trees to be retained as far as practicable.</p>
31	Australian War Memorial	Thank you for your letter received 9 July 2019 and our recent meeting regarding the Blocks 4 & 5 Section 38 Campbell - Concept Plan.

Submission no.	Submitter name	Submission
		<p>I am pleased to confirm that the Memorial has no objection to the proposed Development Control Plan or Concept Plan for this site. As per our discussions however we do note concerns regarding the potential use by contractors working on the former CSIRO site of the Memorial's public parking lot and consequent impacts on members of the public visiting the Memorial.</p> <p>Clearly this would not be acceptable and we seek surety from yourself that any permits granted for these works will include suitable controls to ensure this does not occur. This is particularly the case given the Memorial itself will also be undergoing redevelopment activities and is undertaking considerable work to ensure that its own contractors do no impact the public in this fashion.</p> <p>We look forward to continuing to work with yourself and the Doma Group to minimize the impact of our concurrent projects on the local community and visitors to the Memorial.</p>

Attachment C – Record of public information session

Subject

Blocks 4 and 5 Section 38 Campbell – Concept Plan and revised Development Control Plan
Public information session

Details

Date: 10 July 2019

Time: 6.00pm

Location: National Capital Exhibition, Regatta Point, Barrine Drive, Commonwealth Park

Meeting attendees

Andrew Smith (Chief Planner, National Capital Authority)

Rebecca Sorensen (Director Strategic Planning, National Capital Authority)

Sarah Treble (Senior Strategic Planner, National Capital Authority)

Kate Still (Director National Engagement, National Capital Authority)

Jure Domazet (Doma Group)

Sam Toole (Doma Group)

Marcus Graham (Stewart Architecture)

Michael Hatch (Stewart Architecture)

Approximately 30 members of the public attended.

Discussion

Andrew Smith (AS) commenced the session by providing an introduction of key people and presentation including background information on the site, the current status of the proposed Concept Plan, proposed changes to the Development Control Plan and the next steps in the process. The next steps include:

- 1 July to 9 August 2019 - Public consultation period (submissions to be made by 9 August 2019)
- August 2019 – Consultation report prepared by National Capital Authority (NCA)
- September 2019 – Concept Plan and revised DCP to be considered by NCA Board
- Detailed development plans to be submitted once Concept Plan and revised DCP is approved
- Further public consultation to be undertaken on detailed development plans.

Jure Domazet (JD) provided a short overview of Doma's history with the site.

Marcus Graham (MG) provided a presentation outlining:

- Existing site conditions
- Proposed access to the site and internal road and driveway network
- Location of car parking spaces on site
- Location of apartment buildings and townhouses
- Extent of deep rooted planting and landscape areas
- Details of type and location of landscaping (native and exotic)
- Sketch plans of the landscape plaza between the two apartment buildings
- Artistic perspective and sketches of the main internal street
- A series of drawings showing the various construction layers of a precinct of townhouses including the existing topography, location of garages and driveways, townhouse built form and landscaping
- Shadow diagrams
- Photomontages of the proposed development when viewed from Parliament House and Mt Ainslie to the site
- Artistic perspective of development when viewed from Limestone Avenue.

At the conclusion of presentation, AS invited questions. Below is a summary of questions asked, and comments made, by members of the public, together with the response provided by the NCA, Doma, and/or Stewart Architecture where relevant. The questions and comments have been grouped by theme, rather than the order in which they were put forward at the public information session.

Traffic and movement

Several questions were asked, or comments made, regarding the existing informal access located at the northern end of the site, including:

- Will this informal access-way remain? It is currently used by many people living in Ainslie to access Campbell High School, with many parents using it as a 'drop-off' point for students.
- Consultation should be undertaken with Campbell High School to discuss any changes to access and drop-off arrangements.
- While Doma has indicated that access arrangements and site development will dissuade people from using the informal road access, this view is not shared.
- Road access at the northern edge of the site is not supported.
- Alternatively, road access at the northern edge of the site makes sense, as it provides a route to places like Ainslie shops.
- At some stage site ownership will move from Doma Group to a body corporate. Could an owner's corporation then provide a road to the rear of the site at a later date?

Session attendees were advised that the Concept Plan does not incorporate road access at the northern end of the site. Pedestrians will still be able to walk around the site boundary.

The site is surrounded by Territory Land, such as Campbell High School and urban open space. It is unlikely that a future body corporate would be able to negotiate a revised access arrangement. Site planning, including dwelling layout and the movement network, would also make it difficult to retrofit a new road access at a later date.

A number of session attendees raised strong concern about traffic more broadly, notably the potential impacts on Limestone Avenue. The following issues were discussed:

- Limestone Avenue is already bumper-to-bumper in peak times. Potential future residents may not want to try and contend with this.
- The traffic report providing as part of the Concept Plan documentation makes an error concerning the location of traffic lights at the intersection of Limestone Avenue /Euree Street /Treloar Crescent, and there is concern that there may be more errors.
- There is likely to be additional traffic pressure on Treloar Crescent given the intended changes to access from Quick Street.
- The amount of traffic generated by the development, and its impact on the road network generally, is of concern.
- Currently, the traffic travelling south on Limestone Avenue in the AM peak is not a substantial issue (and was also not a substantial issue when the site was occupied by CSIRO given few people were leaving the site). But it will likely become an issue with the site utilised for residential development, with many people will likely want to leave the site in peak times.
- Is there potential to provide site access via an extension of Ainslie Avenue?

Doma responded that it would consider the issues raised and review the Traffic Impact Assessment.

Construction

During discussion concerning the existing informal northern access, an attendee questioned whether this access would be used during the construction process.

Doma responded that the informal northern access will be used for construction activities, with construction on site expected to take up to three years. There will be a substantial initial effort to establish site infrastructure, with construction of dwellings to commence with the apartment buildings fronting Limestone Avenue.

A Construction Management Plan is required to guide construction activities, and this plan will be made public.

Parking

The following comments were made concerning parking arrangements on site:

- Doma has indicated that there will be lots of visitor parking on the site noting that recent developments have limited visitor parking on site, effectively restricting people from having visitors, or otherwise results in illegal parking impacting (for example) root zones of trees planted within nature strips.

Doma clarified that all visitor parking will be accommodated on site. There is some visitor parking in the forecourts of the apartment buildings and along internal streets, but there will also be visitor parking located in basement areas. On-site parking will be provided at rates above what is required by relevant parking codes.

Environmental matters (including grasslands and landscape)

Several environmental matters were raised, ranging from impacts and management of the grasslands adjacent to the site, to landscaping proposals for apartment buildings and townhouses. The following issues were discussed:

- A question was raised as to whether solar panels would be utilised in the development.

Doma advised that solar panels on townhouses is possible but will be a decision for individual owners. Solar panels on apartment buildings is more difficult from a management perspective, although mechanisms exist that enable this to occur (for example, to apportion proportional costs to each apartment). Solar panels will be installed on the apartment buildings.

- Comment was made that the landscape plans should make provision for not only trees, but shrubs and other lower level vegetation. This will help to attract and support the movement of birds and insects. Related to this comment was a question concerning whether there would be opportunities for roof top gardens.

Doma confirmed that the landscape concept provides for both trees and understorey planting. In regard to roof top gardens, these are not being explored for the apartment buildings as it restricts the application of other infrastructure such as solar panels. Townhouses will have the capacity for roof top gardens, however the decision to establish such a garden will be at the discretion of individual owners.

- What is intended in regard to fencing between the grassland area and the development? For example will any fencing be softened by landscaping? Preference is that the fencing is not pre-fabricated metal.

Doma explained that the decision under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) requires that a fence be located one metre off the site boundary between the grasslands and the subject block. The intent is to construct a masonry style fence, however there are limitations on the types of planting that can occur within the one metre between the fence and site boundary.

- Concern was expressed that the development appears as a 'gated community'. One attendee noted that they were not convinced about environmental arguments to restrict direct access to the grasslands, and that fencing the perimeter of the site lends itself to being a gated community.

Doma and NCA representatives explained that proposed fencing and no direct access between the site and grasslands is a result of the conditions of approval under the EPBC Act. Fencing the site also considers adjacent land uses such as the school.

Other comments

A number of other questions and topics were raised, as follows:

- Will there be commercial development as part of the proposal?

Doma responded that no commercial tenancies are to be provided as part of the development. Initial exploration undertaken into land uses for the site suggested that small scale retail or cafes may be appropriate, however these types of uses are unlikely to be viable.

The DCP does not need to be amended to accommodate a proposal that does not include commercial development, however the proposed amendments to the DCP effectively 'lock in' the development intent (including in relation to building heights).

- How has the Monash Drive road reservation been taken into account?

The NCA explained that if the ACT Government wished to pursue the construction of Monash Drive, this would involve a separate planning and environmental approval process.

- Concern was expressed that site heritage will be lost with the proposed development. The rocky outcrops on site are evident in photographs from early Canberra days, and it was questioned whether these would be retained?

Doma responded that the bulk of rocky outcrops in the area are located off the development site. The attendee who raised the matter subsequently responded that the critical outcrop is located on the site, and it was preferable that they be retained.