

**From:** [smartforms@act.gov.au](mailto:smartforms@act.gov.au)  
**To:** [EPD, Customer Services](#)  
**Subject:** DA201835109 - REPRESENTATION - [REDACTED] [SEC=UNCLASSIFIED, DLM=Sensitive: Personal]  
**Date:** Tuesday, 22 January 2019 12:03:02 AM  
**Attachments:** [99125120190122001261.xml](#)  
[99125120190122001261.pdf](#)

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## Representation for Current Development Application

### Form data summary

**Customer name** [REDACTED]  
**Reference code** VGSKYT

For issues or questions relating to SmartForms please contact the Payment Services Integration Team on \*5 4607 or email [smartforms.admin@act.gov.au](mailto:smartforms.admin@act.gov.au)

# Representation for Current Development Application - submission confirmation

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

Date and time

22 Jan 2019 12:01:11 AM

Reference code

VGSKYT

Thank you for your representation regarding development application number: DA201835109

The issues raised in your submission will be taken into consideration during the assessment of the development application and you will be notified in writing once a decision has been made.

Section 156(2) of the *Planning and Development Act 2007* states that a representation about a development application must be made during the public consultation period for the application. If your representation was made outside the public consultation period it cannot be considered during the assessment of the application.

Please Note: A copy of your representation will be forwarded to the development application applicant and can be released to the public on request, unless you have requested and been granted an exemption.

Access Canberra  
Environment and Planning Directorate

GPO Box 158  
Canberra City ACT 2601

Telephone: (02) 6207 1923

## Representor details

Title Given name \* Family name \*

Mr

Organisation name

Home phone number

Work phone number

Mobile number

Email address \*

# Development details

---

## Site details

Development application number \*

DA

Suburb/District \*

Section \*

Block \*

Unit

If you require help with suburb/district, section or block details, visit [ACTMAPi](#).

## Representation

---

Provide the details of your representation \*

The public transport network plan is incorrect both for the current network and the proposed new network. It does not accurately portray routes 30 and 31 (new network), and routes 1, 8 and 7 (Current Network).

The removal of bus parking on Anti street will further exacerbate bus parking in the Dickson area, particularly in relation to non-ACTION school services that congregate in the vicinity (Current bus layover area where coaches dock would be). No alternative parking/ layover parking provided.

Otherwise a suitable development roughly in keeping with the area.

You may upload any additional supporting documentation or photos.

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**From:** [smartforms@act.gov.au](mailto:smartforms@act.gov.au)  
**To:** [EPD, Customer Services](#)  
**Subject:** DA201835109 - REPRESENTATION - [REDACTED] [SEC=UNCLASSIFIED, DLM=Sensitive: Personal]  
**Date:** Friday, 25 January 2019 12:11:07 PM  
**Attachments:** [99125120190125124821.xml](#)  
[99125120190125124821.pdf](#)

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## Representation for Current Development Application

### Form data summary

**Customer name** [REDACTED]  
**Reference code** SY8TXH

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# Representation for Current Development Application - submission confirmation

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

Date and time

25 Jan 2019 12:08:45 PM

Reference code

SY8TXH

Thank you for your representation regarding development application number: DA201835109

The issues raised in your submission will be taken into consideration during the assessment of the development application and you will be notified in writing once a decision has been made.

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GPO Box 158  
Canberra City ACT 2601

Telephone: (02) 6207 1923

## Representor details

Title Given name \* Family name \*

Mr

Organisation name

Home phone number

Work phone number

Mobile number

Email address \*

# Development details

---

## Site details

Development application number \*

DA

Suburb/District \*

Section \*

Block \*

Unit

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## Representation

---

Provide the details of your representation \*

Dear EPD

The off-site works plan shows both driveways into McDonalds off Dickson Place being reconstructed in concrete along with the kerb. There does not appear to be any intention to re-pave the footpath or widen it along this section, contrary to all the other footpath areas on both sides of this road, all of which will receive new paving.

This is contrary to TCCS design standards that footpaths should always have priority over driveways, and contrary to the aims of the City and Gateway Urban Renewal Strategy, which also seeks to prioritise active travel. It is also counter to the Dickson master plan which identifies this route as a main pedestrian spine. The proposed new paving shown in front of Woolworths should continue across these new driveways all the way to Badham Street in order to give the footpath visual priority.

This section of path will be (and already is) very busy as it is the main pedestrian link between the Dickson library precinct and the Woolley Street restaurant precinct. In addition, cyclists will be required to ride on the footpath along here, as the road is proposed to be one-way in the opposite direction. It seems therefore, that the footpath width should be maximised. This can be achieved by removing the garden beds between the current footpath and the McDonalds car park, which appear to be on public land, bringing the new paving right up to the boundary.

Cheers

You may upload any additional supporting documentation or photos.

Click here for more information on applying for exemption from the public register.

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**From:** [smartforms@act.gov.au](mailto:smartforms@act.gov.au)  
**To:** [EPD, Customer Services](#)  
**Subject:** DA201835109 - REPRESENTATION - [REDACTED] [SEC=UNCLASSIFIED, DLM=Sensitive: Personal]  
**Date:** Wednesday, 30 January 2019 5:57:04 AM  
**Attachments:** [99125120190130059452.xml](#)  
[99125120190130059452.pdf](#)

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## Representation for Current Development Application

### Form data summary

**Customer name** [REDACTED]  
**Reference code** MTB6JN

For issues or questions relating to SmartForms please contact the Payment Services Integration Team on \*5 4607 or email [smartforms.admin@act.gov.au](mailto:smartforms.admin@act.gov.au)

# Representation for Current Development Application - submission confirmation

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

Date and time

30 Jan 2019 5:55:03 AM

Reference code

MTB6JN

Thank you for your representation regarding development application number: DA201835109

The issues raised in your submission will be taken into consideration during the assessment of the development application and you will be notified in writing once a decision has been made.

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Environment and Planning Directorate

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Telephone: (02) 6207 1923

## Representor details

Title Given name \* Family name \*

Mr

Organisation name

Home phone number

Work phone number

Mobile number

Email address \*

# Development details

---

## Site details

Development application number \*

DA

Suburb/District \*

Section \*

Block \*

Unit

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## Representation

---

Provide the details of your representation \*

To whom it may concern,  
Writing to express strong support for the new DA plans released for this development. It has taken into account previous community input. As a local resident home owner near the site - my family and I live in Downer [redacted] - we do support this development and would like to see it approved for this vitally needed community facilities. Our preference was to also include a Aldi supermarket too, however additional shopping community facilities is desperately needed in this area.  
  
We would like to see the ACT Government or the builder invest in upgrading the other parts of Dickson, such as the foot paths, pavers and landscaping, etc.  
[redacted]

You may upload any additional supporting documentation or photos.

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

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**From:** [smartforms@act.gov.au](mailto:smartforms@act.gov.au)  
**To:** [EPD, Customer Services](#)  
**Subject:** DA201835109 - REPRESENTATION - [REDACTED] [SEC=UNCLASSIFIED, DLM=Sensitive: Personal]  
**Date:** Wednesday, 30 January 2019 1:05:02 PM  
**Attachments:** [99125120190130132016.xml](#)  
[99125120190130132016.pdf](#)

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## Representation for Current Development Application

### Form data summary

**Customer name** [REDACTED]  
**Reference code** VT5X9X

For issues or questions relating to SmartForms please contact the Payment Services Integration Team on \*5 4607 or email [smartforms.admin@act.gov.au](mailto:smartforms.admin@act.gov.au)

# Representation for Current Development Application - submission confirmation

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

Date and time

30 Jan 2019 1:03:46 PM

Reference code

VT5X9X

Thank you for your representation regarding development application number: DA201835109

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Section 156(2) of the *Planning and Development Act 2007* states that a representation about a development application must be made during the public consultation period for the application. If your representation was made outside the public consultation period it cannot be considered during the assessment of the application.

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Environment and Planning Directorate

GPO Box 158  
Canberra City ACT 2601

Telephone: (02) 6207 1923

## Representor details

Title Given name \* Family name \*

Mr

Organisation name

Home phone number

Work phone number

Mobile number

Email address \*

# Development details

---

## Site details

Development application number \*

DA

Suburb/District \*

Section \*

Block \*

Unit

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## Representation

---

Provide the details of your representation \*

Upon review of the plans, it appears that approximately 240 current car parks will be demolished. Although the plan is to build 472 basement level car parks, this would be shared with 140 apartments.

Issues with the development involve the number of car parks to be constructed. Assuming the apartments use approximately 200 car parks, there will either be a negligible or no net increase in the number of public car parks. Due to the increased business in the area, less car parks will be available.

For the benefit of Dickson residents and to account for future growth, would it not be beneficial to increase the number of car parks to be constructed?

You may upload any additional supporting documentation or photos.

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**From:** [smartforms@act.gov.au](mailto:smartforms@act.gov.au)  
**To:** [EPD, Customer Services](#)  
**Subject:** DA201835109 - REPRESENTATION - [REDACTED] [SEC=UNCLASSIFIED, DLM=Sensitive: Personal]  
**Date:** Monday, 4 February 2019 2:37:03 PM  
**Attachments:** [99125120190204145156.xml](#)  
[99125120190204145156.pdf](#)

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## Representation for Current Development Application

### Form data summary

<b>Customer name</b>	[REDACTED]
<b>Reference code</b>	RPPS2P

For issues or questions relating to SmartForms please contact the Payment Services Integration Team on \*5 4607 or email [smartforms.admin@act.gov.au](mailto:smartforms.admin@act.gov.au)

# Representation for Current Development Application - submission confirmation

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

Date and time

04 Feb 2019 2:35:54 PM

Reference code

RPPS2P

Thank you for your representation regarding development application number: DA201835109

The issues raised in your submission will be taken into consideration during the assessment of the development application and you will be notified in writing once a decision has been made.

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Access Canberra  
Environment and Planning Directorate

GPO Box 158  
Canberra City ACT 2601

Telephone: (02) 6207 1923

## Representor details

Title Given name \* Family name \*

Mr

[REDACTED]

[REDACTED]

Organisation name

Home phone number

Work phone number

Mobile number

Email address \*

# Development details

---

## Site details

Development application number \*

DA

Suburb/District \*

Section \*

Block \*

Unit

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## Representation

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Provide the details of your representation \*

\* While development is occurring, where are vehicles that use the existing 237 going to be expected to park? Dickson appears to be very busy most of the time with a difficulties finding spots to park. Will a alternate nearby arrangement be made?  
\* Suggest requesting an increase in carparks made available so can be used by the wider Dickson area. Maybe increase basement carpark to a 3rd level or 4th level. This location is perfect for a large carpark as it is on the edge of Dickson town centre so less traffic will need to enter the more central areas.  
\* The side facing Anti Street has no active street facing use. If Anti Street was ever to be used for Light Rail, I assume a Light Rail stop would be located very close to this location. It would be more appropriate for the street frontage to have more pedestrian access, interest and use. The nearby residents on the other side of Anti may also appreciate that more as well.

You may upload any additional supporting documentation or photos.

Click here for more information on applying for exemption from the public register.

**From:** [smartforms@act.gov.au](mailto:smartforms@act.gov.au)  
**To:** [EPD, Customer Services](#)  
**Subject:** DA201835109 - REPRESENTATION - [REDACTED] [SEC=UNCLASSIFIED, DLM=Sensitive: Personal]  
**Date:** Tuesday, 19 February 2019 4:59:03 PM  
**Attachments:** [99125120190219161036.xml](#)  
[99125120190219161036.pdf](#)

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## Representation for Current Development Application

### Form data summary

**Customer name** [REDACTED]  
**Reference code** SFFYBD

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# Representation for Current Development Application - submission confirmation

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

Date and time

19 Feb 2019 4:57:54 PM

Reference code

SFFYBD

Thank you for your representation regarding development application number: DA201835109

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Access Canberra  
Environment and Planning Directorate

GPO Box 158  
Canberra City ACT 2601

Telephone: (02) 6207 1923

## Representor details

Title Given name \* Family name \*

Mr

[Redacted]

[Redacted]

Organisation name

Home phone number

Work phone number

Mobile number

Email address \*

# Development details

---

## Site details

Development application number \*

DA

Suburb/District \*

Section \*

Block \*

Unit

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## Representation

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Provide the details of your representation \*

I have lived at  DOWNER for over 30 years and so, I have an intimate knowledge of the street and its relationship to Dickson shopping centre directly opposite.

Over the years, I have observed a steady increase in the number of motor vehicles using the street; an increase in the number of ACTION buses parked opposite my house with their diesel engines left idling and polluting for hours; an increase in the number of Woolworths semi-trailers parked opposite my home with their diesel engines left running at all hours; the associated vibrations rattling my windows; the associated emissions poisoning my blood; an increase in the use of noisy petrol lawnmowers at 6 in the morning etc etc.

The proposed development will add a large supermarket and 140 apartments serviced by a loading zone and waste collection facility located directly opposite my house. That is a lot more noise, vibration and diesel fumes in a residential area meant to house people, families and children.

The proposed development will remove park and and at least 30 established trees directly opposite my house and replace them with a stinking eyesore of overflowing waste, graffiti and trucks parked all over the place. You only need to have a look at the rear end of other shopping centres around Canberra (and Dickson Place at the rear of Dickson Woolworths) to see what will become of Anti Street,

This is not acceptable in a residential area. The service areas of the proposed development should be located in a service lane within the development, away from houses and families. There should be a green buffer zone between the development and Anti Street, as there has been since the inception of Dickson shops.

I strongly object to the proposed development in its current form.

You may upload any additional supporting documentation or photos.

Click here for more information on applying for exemption from the public register.

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**From:** [REDACTED]  
**To:** [EPD, Customer Services](#)  
**Subject:** Friends of Dickson Pool submission re Development Application 201835109 - Block 21, Section 30  
**Date:** Tuesday, 26 February 2019 9:56:43 AM

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26 February 2019

### **Friends of Dickson Pool submission re Development Application 201835109 – Block 21, Section 30**

Thank you for the opportunity to respond to Development Application (DA) 201835109, a revision to the previous DA 201425744 for this site. This representation is submitted on behalf of the Friends of Dickson Pool (FoDP), a community group formed to promote the interests of pool users and protect the leafy green surrounds of the pool. The Dickson Aquatic Centre (DAC), though not in the DA precinct, is potentially impacted by the development of Block 21, Section 30.

In writing we look to highlight the long term community interest in parking matters associated with the current DA and its predecessor, seek that existing commitments in this area be acknowledged and ask that clearly identified options for any temporary parking arrangements be progressed in consultation with relevant stakeholders to minimise community disruption.

In 2014 FoDP began raising concerns about parking arrangements proposed in support of DA 201425744, notably a temporary car park proposed for Block 13, Section 72 immediately to the north of the pool. In 2016 the ACT Government Environment and Planning Directorate Deputy Director-General confirmed that the space would not be used as a temporary car park (Canberra Times, 29 June 2016). Minister Rattenbury also noted that sufficient car parks could be found to avoid the need to use the open space adjacent to Dickson Pool (email correspondence in response to FoDP representation, 20 June 2016).

The DA includes a December 2018 Traffic Impact Assessment (TIA) which considers some likely impacts of the development beyond the nominated Block 21, Section 30, including to local parking. We believe that the TIA cannot make useful findings about these impacts as it does not clearly outline parking options and it does not record an existing commitment regarding parking adjacent to the pool, in addition to other issues outlined below.

- Temporary parking: The current examination of parking options in the TIA refers variously to temporary contractor parking on Section 72 (TIA, p 52) as well as on Block 25, Section 72 (TIA, p 34). There must be clarification on the precise location for any new parking associated with the DA (both construction and operational phases) and in particular that Block 13, Section 72 be specifically ruled out for parking purposes in line with previous commitments.
- Shorter-stay parking: The TIA refers to March 2017 correspondence from the ACT Government Coordinator-General Parking regarding management of parking and interprets that, should the current DA be approved, there will be the 'Conversion of public car spaces within 200m of the Site to shorter stay parking' (TIA, p32). Parking adjacent to DAC is included in the Dickson Parking Survey but is not recorded in a table of parking areas within 200 metres of the DA site (TIA, Appendix C). This contributes to a lack of clarity about parking areas which may be subject to change.
  - We ask that parking areas which may be subject to shorter term parking arrangements be clearly identified and, if there is an impact for pool patrons, that DAC management is consulted regarding options.

FoDP very much appreciates the 2016 commitments to spare the leafy green backdrop to the pool from parking, and also subsequent efforts to meet parking shortfalls, both associated with the proposed development. This submission highlights the community's interest in parking matters, seeks acknowledgement of the current ACT Government commitments to preserve Block 13 and seeks clarification and consultation regarding any proposed parking changes.



**From:** [smartforms@act.gov.au](mailto:smartforms@act.gov.au)  
**To:** [EPD, Customer Services](#)  
**Subject:** DA201835109 - REPRESENTATION - [REDACTED] [SEC=UNCLASSIFIED, DLM=Sensitive: Personal]  
**Date:** Wednesday, 27 February 2019 12:09:02 AM  
**Attachments:** [99125120190227008765.xml](#)  
[99125120190227008765.pdf](#)

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## Representation for Current Development Application

### Form data summary

<b>Customer name</b>	[REDACTED]
<b>Reference code</b>	K29P32

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# Representation for Current Development Application - submission confirmation

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

Date and time

27 Feb 2019 12:08:20 AM

Reference code

K29P32

Thank you for your representation regarding development application number: DA201835109

The issues raised in your submission will be taken into consideration during the assessment of the development application and you will be notified in writing once a decision has been made.

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Access Canberra  
Environment and Planning Directorate

GPO Box 158  
Canberra City ACT 2601

Telephone: (02) 6207 1923

## Representor details

Title Given name \* Family name \*

Ms

[REDACTED]

[REDACTED]

Organisation name

[REDACTED]

Home phone number

[REDACTED]

Work phone number

[REDACTED]

Mobile number

[REDACTED]

Email address \*

[REDACTED]

# Development details

---

## Site details

Development application number \*

DA

Suburb/District \*

Section \*

Block \*

Unit

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## Representation

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Provide the details of your representation \*

The Anti St facing side of the building (Anti St elevation) has no activation, making it a bland, uninspired eyesore from Anti St. The backside of the building needs to be the underside. Hide the access ramp and the loading dock better, and dig deeper. Activating as much as possible of the building at ground/footpath level will ensure the community feel of Dickson shops is retained, and encourage and enable the already high-levels of foot traffic through the area.

Less symmetry in the facade may soften the very dominating and stark block of residential apartments being proposed.

The external finishes are very harsh and are not referential to the surroundings. The strong use of black on highly engineered elements in PCF 1, LV 1, BAL 1, CMR 1 and CMR 2 make the building very harsh. I think the design would be improved with a softening of some of the proposed harsh lines used in the design and a less severe colour palette. The use of actual brick on the Anti St facade is an improvement on previous designs. However, I think lighter, perhaps sand colour brick would work better.

Please do not bring another bland development into Dickson. This has the potential to be an iconic Coles and an architecturally interesting and human sensitive design would really add to the community feel of the Dickson shops. Dickson is not a Westfield. Thank you for the opportunity to comment.

You may upload any additional supporting documentation or photos.

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**To:** [EPD, Customer Services](#)  
**Subject:** DA201835109 - REPRESENTATION - [REDACTED] [SEC=UNCLASSIFIED, DLM=Sensitive: Personal]  
**Date:** Wednesday, 27 February 2019 8:35:02 PM  
**Attachments:** [99125120190227205218.xml](#)  
[99125120190227205218.pdf](#)

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## Representation for Current Development Application

### Form data summary

<b>Customer name</b>	[REDACTED]
<b>Reference code</b>	97K35Y

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# Representation for Current Development Application - submission confirmation

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

Date and time

27 Feb 2019 8:33:53 PM

Reference code

97K35Y

Thank you for your representation regarding development application number: DA201835109

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Environment and Planning Directorate

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Canberra City ACT 2601

Telephone: (02) 6207 1923

## Representor details

Title Given name \* Family name \*

Ms

Organisation name

Home phone number

Work phone number

Mobile number

Email address \*

# Development details

## Site details

Development application number \*

DA

Suburb/District \*

Section \*

Block \*

Unit

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## Representation

Provide the details of your representation \*

Submission re Development Application 201835109 – Block 21, Section 30

Thank you for the opportunity to make a submission on Development Application (DA) 201835109.

My comments concern the ongoing provision of adequate, long term, and preferably free parking near Dickson Pool (Dickson Aquatic Centre).

I understand that this area is not in Block 21 Section 30 but this area may be impacted by temporary parking during construction for DA 201835109 and/or changed parking arrangements associated with the development.

Dickson Pool is a fantastic facility that provides fairly affordable opportunities for people to learn water safety, to learn to swim, get and stay fit, have a healthier lifestyle, rehabilitate from injuries, meet up with friends and family, and have healthy fun. All of these are very important for the wellbeing of the Canberra Community.

Apart from the high quality facilities and excellent management, this pool is made a particularly great place to be because of the beautiful shady trees and grass areas, and the open space and trees surrounding this site.

The pool is used by a wide variety of the community ranging from very small and older children with their parents, young adults, older adults and seniors including very old people. The attractive environment means that more people are likely to use this facility with the associated health and community welfare benefits as discussed above. For many people, it is a great alternative to an indoor pool during the season.

The current parking arrangements near Dickson Pool means the above activities are accessible to and affordable for most people. Retaining these or similar arrangements is critical because many of the clients are parents with children and elderly people who would not be able to walk very far. The current parking arrangements are also safer for small children and elderly than the shopping centre car parks. In my opinion, there are already enough shops, there is only one Dickson Pool, and this should remain accessible to its wide range of users.


I am writing to strongly request that all of the current free long term parking that is available near Dickson Pool (Dickson Aquatic Centre) be retained. Many visitors to the pool (though not all) especially families, are there for extended periods.

Any temporary parking changes to the Dickson Pool vicinity should be progressed only with real consultation with stakeholders. These include Dickson Aquatic Centre management, Friends of Dickson Pool and the Dickson Pool users. It would not be in the interests of the Canberra community if the access to this wonderful, people's facility were compromised to provide advantage to commercial interests.

I also bring to your attention the previous proposal to provide a temporary car park in Block 13, Section 72 immediately to the north of the pool. I remind you that in 2016 the ACT Government Environment and Planning Directorate Deputy Director-General confirmed that the space would not be used as a temporary car park (Canberra Times, 29 June 2016). I understand that this was confirmed by Minister Shane Rattenbury.

Please acknowledge receipt of this submission.

Regards

  
Long time pool user  
27 February 2019

You may upload any additional supporting documentation or photos.

Click here for more information on applying for exemption from the public register.

**From:** [REDACTED]  
**To:** [EPD, Customer Services](#)  
**Cc:** [REDACTED]  
**Subject:** DA201835109 Block 21 Section 30 Dickson - Coles DA  
**Date:** Thursday, 28 February 2019 8:00:59 AM  
**Attachments:** [Summary of main concerns and relevant points.pdf](#)

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Dear Madam/Sir,

The history of this proposal has highlighted a series of shortcomings in the ACT's planning system, that remain of grave concern. Both the legislation and work practices in several Directorates urgently require reform, yet almost a year has elapsed since the Tribunal's decision was handed down in the proceedings of *Sladic & Charter Hall v ACTPLA* (ACAT 38 of 2018).

I'd like to thank the CGPD project manager Rebecca Thomas for taking on board the community's concerns and being consistently professional, well-intentioned and flexible.

For my own part, and on behalf of Dickson Residents Group, I am satisfied that this new proposal addresses the major concerns that the community groups raised in the ACAT proceedings as parties joined to Charter Hall. Attached is a summary of the main points and issues that we maintained were critical to get right in terms of public realm and design improvements.

As for the residential component of the development, I contend there is still scope for improvement, and conditions of approval are capable of addressing the facades and corner treatment, corridors, balustrades and roofline of the DA. Given that the Design Review Panel has to the best of my knowledge not been privy to the plans despite the Holding Lease status and 7 storeys, it could be useful to run the plans past them for recommendations about conditions.

I have a few concerns about the following items, that seem to me to need some further refinement or explanation:

- The intersection of Roads A and B, in particular at the junction where the new one way service road will merge with the traffic that's just come up the ramp exiting the basement - the sightlines here are poor and making sure that drivers yield is complicated. It may be sensible to redesign this convergent point, and if the shade tree is deleted I would suggest introducing a playful modern sculpture that complements the library (such as the kinetic sculpture featured at the airport by Phil Price)
- The traffic island between Block 21 and the Dickson Health Centre, and whether it would be better to direct all the foot traffic over to the Health Centre from Downer and put a wide east-west crosswalk here instead with a relatively small refuge
- The estimated shortfall of 40-50 car spaces, which I gather from the Traffic Impact Report the applicant proposes to address during the construction phase by leasing spaces off-site (see p33)
- The choice of oaks for the Antill St frontage, given the trip hazards for pedestrians and cyclists caused by acorns for an extended period of the year
- The lack of any apparent indents in the doorways for the upper floor apartments (to ameliorate the motel corridor effect)
- The disappointingly bland treatment of the NW corner and the missed opportunity for a more exciting gateway expression
- The lack of any indication at this stage of where signage will be located on or near the building

If there's scope to introduce timber eaves on the undersides of the awnings, it would help tie those in with the rest of the shopping centre (the library's eaves were originally timber so if the conservation management plan is ever applied they should be reinstated). I'm reluctant to comment on subjective design decisions and the colour palette, but I'd encourage the new designer and his client to be adventurous. By the time this building opens, it will be the 2020s - surely that justifies something slightly radical that signals that Canberra has come of age?

As for traffic and temporary parking, I've come to the conclusion this needs to be sheeted back to the ACT government and TCCS. We can't pretend it's not an issue. Having sold this lease to Coles and the southern carpark to Tradies, it's incumbent on the ACT government to produce a comprehensive traffic analysis that takes into account the likely scale and nature of development in the next 10 years, both within the group centre and its surroundings, and come up with a plan for traffic management and parking that's realistic. That will almost certainly involve at least one multi-storey carpark.

Finally, I wish to place on the record that the experience of the last 4 years has proven that the community's concerns about redevelopment done poorly with inadequate oversight were validated by the Tribunal, yet were capable of being addressed with goodwill. What was missing from the equation were people in positions of authority prepared to listen carefully, insist on compliance with the Territory Plan, and act responsibly. I remain deeply disappointed that the heritage values of Dickson Library were so easily dismissed by the ACT Heritage Council's Chair, despite the 2013 Conservation Management Plan and the mandatory exclusion zone in the Dickson Precinct Code. I remain alarmed that technical amendments were employed to rezone key areas of community facility land (CFZ) on not just one but two occasions to commercial CZ1, without any information being provided to the public that this was taking place or what it meant or why it was being done. I am particularly dismayed that the legislative uncertainty exposed during the hearing (Section 121 of the *Planning and Development Act 2007*) that radically restricted the scope of merit track assessment available during reconsideration, has not been dealt with as a matter of urgency by the ACT's Attorney-General in spite of it being forcefully underlined in the Tribunal's decision as a matter of the "highest priority". This leaves the door open to any developer who is refused, or approved with conditions they may not be happy about, to apply for reconsideration and thereby heavily restrict the normal range of planning considerations that must be had regard to by ACTPLA, or the Tribunal in an administrative review.

Kind regards

[REDACTED]

[REDACTED]

m: [REDACTED]

We support a development going ahead.

A centre that's attractive, safe, efficient, well integrated and connected with healthy pedestrian flows and good solar access is going to benefit the community as a whole.

Main concerns:

**RESPECT HERITAGE** – design interface with library that's sympathetic and complementary: no ramp or other building part inside the mandatory exclusion zone, consider views from inside the library and external views toward the library. Ensure that any vehicle travelling near the library's roof is adequately separated

**FACILITATE PEDESTRIAN FLOWS** – remove, minimise and relocate barriers, facilitate safe crossings via multiple desire lines, widen footpaths to 4m+

**PROTECT SOLAR ACCESS** – main square is heavily used, shade in winter after school would diminish this hub. We'd recommend pulling back the building at the SE corner and lowering the podium height along Roads A and B

**STRENGTHEN CORNERS** – these act as places of arrival and focal points and therefore need to welcome and invite, and communicate a sense of identity. The SE corner should link with the main square and open up here

**ACTIVATE FRONTAGES** – Badham, Roads A and B all need small ground floor tenancies that wrap around and spill out, with continuous awnings for weather protection.

**ENHANCE LANDSCAPE TREATMENT** – Antill St corridor is a busy arterial. An industrial back end is unsightly and visible from major approach routes and residential areas. Retaining significant trees and landscaping all along this frontage would help, and provide a buffer

**CONTAIN ACCESS WITHIN BLOCK BOUNDARY** – ramps and driveways should not impinge on the public domain

**ENSURE GOOD DISABLED ACCESS LONG TERM** – lifts, levels, surfaces, lighting, parking, toilets etc

## FURTHER POINTS:

Provide temporary parking during construction phase to support small traders

Setback building from Antill – preserve angular geometry and allow for a landscaped buffer facing Downer, retaining significant trees

Break up massing – this will help to reduce bulk and give the complex a less institutional monotonous character – see Michael Harrison's urban design report and 3 towers suggested

Integrate new and old - Upgrade paving, introduce new street furniture theme to the rest of the shopping core

Produce an accurate model and display that publicly when next DA is lodged

Comply with Territory Plan standards and objectives

Showcase best practice for commercial and residential developments

**From:** [REDACTED]  
**To:** [EPD, Customer Services](#)  
**Subject:** DICKSON Block 21 Section 30  
**Date:** Wednesday, 20 February 2019 4:58:55 PM  
**Attachments:** [image001.jpg](#)  
[image002.jpg](#)  
[image003.gif](#)  
[20190220 Ltr to ACTPLA.pdf](#)

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Please find attached correspondence forwarded today on behalf of the National Trust of Australia (ACT).

Regards

[REDACTED]  
[REDACTED]

EMA Logo Email Signature



**IMPORTANT NOTICE**

This message is intended for the named recipients only and may be confidential. If you receive it in error, please notify and then destroy the copy of the message. Although reasonable precautions are taken, Eric Martin & Associates does not represent, warrant or guarantee that the integrity of this communication has been maintained, nor that it is free from errors, virus or interference.

Description: frog email





NATIONAL TRUST

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T: 02 6230 0533

PATRON: The Hon Margaret Reid AO

Environment, Planning and Sustainable Development  
Directorate – Planning  
Gateway Team  
16 Challis St  
DICKSON ACT

Attention: [epdcustomerservices@act.gov.au](mailto:epdcustomerservices@act.gov.au).

## **DICKSON BLOCK 21 SECTION 30 DA2018 35109**

We note the proposed development and that it appears to respect the curtilage of the heritage listed Dickson Library, but there is a lack of clarity and information to make firm conclusions.

- There is no site plan that overlaps the Dickson Library curtilage with the proposed development so it is unclear if there is encroachment or not.  
Drawing 201 shows the buffer zone, but the plan is not clear and does not easily reconcile with the ground floor plan 009
- The streetscape elevation (Drawing 101) and Part 2 Design Overview on page 6 of the DA report only show the Dickson Library indicatively and does not show an accurate outline so the impact is open to interpretation.
- The images of the development exclude any image of the Library.
- The section through the site does not show the Dickson Library or the curtilage. The landscape drawing 26 provides a reasonable section through the space between the two buildings but does not include the carpark ramp or does it show the Library form correctly so the real impact is unclear.
- It is unfortunate that ACT Heritage do not make any comment on the impact of the development except services and traffic.

The development is a large one beside a heritage listed building so there will be a scale and streetscape impact.

It would be appreciated if more detail could be provided to make a better assessment of the proposal.

Yours faithfully



**From:** [smartforms@act.gov.au](mailto:smartforms@act.gov.au)  
**To:** [EPD, Customer Services](#)  
**Subject:** DA201835109 - REPRESENTATION - [REDACTED] [SEC=UNCLASSIFIED, DLM=Sensitive: Personal]  
**Date:** Thursday, 28 February 2019 6:51:06 PM  
**Attachments:** [99125120190228181859.xml](#)  
[99125120190228181859.pdf](#)  
[combined submission.pdf](#)

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## Representation for Current Development Application

### Form data summary

**Customer name** [REDACTED]  
**Reference code** HBLNKM

For issues or questions relating to SmartForms please contact the Payment Services Integration Team on \*5 4607 or email [smartforms.admin@act.gov.au](mailto:smartforms.admin@act.gov.au)

# Representation for Current Development Application - submission confirmation

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

Date and time

28 Feb 2019 6:50:22 PM

Reference code

HBLNKM

Thank you for your representation regarding development application number: DA201835109

The issues raised in your submission will be taken into consideration during the assessment of the development application and you will be notified in writing once a decision has been made.

Section 156(2) of the *Planning and Development Act 2007* states that a representation about a development application must be made during the public consultation period for the application. If your representation was made outside the public consultation period it cannot be considered during the assessment of the application.

Please Note: A copy of your representation will be forwarded to the development application applicant and can be released to the public on your request, unless you have requested and been granted an exemption.

Access Canberra  
Environment and Planning Directorate

GPO Box 158  
Canberra City ACT 2601

Telephone: (02) 6207 1923

## Representor details

Title Given name \* Family name \*

Ms

[REDACTED]

[REDACTED]

Organisation name

[REDACTED]

Home phone number

[REDACTED]

Work phone number

[REDACTED]

Mobile number

[REDACTED]

Email address \*

[REDACTED]

# Development details

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## Site details

Development application number \*

DA

Suburb/District \*

Section \*

Block \*

Unit

If you require help with suburb/district, section or block details, visit [ACTMAPi](#).

## Representation

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Provide the details of your representation \*

Please see attached representation

You may upload any additional supporting documentation or photos.

File: combined submission.pdf

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



28 February 2019

ACT Government  
Environment, Planning and Sustainable Development Directorate - Planning  
PO Box 365  
Mitchell ACT 2911

Dear Sir/Madam,

**Submission on Development Application 201835109 – Block 21 Section 30 Dickson**

We act on behalf of the owner, Charter Hall, of 1 Dickson Place and are writing in relation to the most recent mixed use development application for Block 21 Section 30 in Dickson (the site), DA No 201835109.

The current application proposes the construction of a seven storey mixed use development incorporating one supermarket, ground floor retail tenancies, 140 residential units, basement and podium car parking, communal resident areas and a new public space/square.

There are significant town planning, urban design, traffic and parking issues associated with his proposal. The key issues are outlined below, and are addressed in detail in the attached reports from Architectus, McLaren Traffic Engineers and Urbis.

**1. Urban Design**

The proposed development contains a number of poor design features which result in inconsistency with the Territory Plan and the objectives of the zone, as detailed in the Architectus report. These include:

a. Development integration

The proposed development does not integrate with the existing retail area and heritage library building. This should be addressed by the proponent revising the design, including:

- relocation of the travelator and lifts to link to the public domain (rather than the lobby of the proposed supermarket);
- improvement of visual connections between the development and other spaces; and
- redesign of the proposed vehicle ramps to be contained wholly within the proposed development.

b. Vegetative landscaping

The extent and type of vegetative landscaping proposed is inadequate to achieve an appropriate level of visual amenity. There should be a thickly vegetated landscape setback to Antill Street and increased tree numbers along the Antill St frontage. Trees should be planted flush with ground treatments, consistent with existing trees in the Dickson Centre, rather than in planters as is proposed.

c. Residential amenity

The proposed development does not comply with the Territory Plan requirements for housing diversity and solar access, compromising the amenity of the residential component of the proposed development. There is a high number of small apartments and only a small number of apartments which have adequate solar access and natural ventilation. This will result in low levels of amenity for a large number of occupants.

d. External design

A number of changes to building treatments and the design of the proposed public space are required to improve visual amenity.

## 2. Traffic and Parking

This application, along with all previous applications for the site, continues to inadequately address the key issues of traffic and parking. The Dickson Centre is a busy and important commercial centre. It is essential that the site be developed in a manner which does not compromise existing businesses during the construction period. It is also essential that the development facilitates adequate vehicle access and parking, without compromising pedestrian and cyclist safety. For the reasons set out in detail in the McLaren Traffic Engineers Report, the current application does not achieve these objectives.

a. Traffic congestion

The traffic report included in the development application acknowledges that there will be a significant increase in traffic as a result of the development and that this will result in major traffic congestion and the oversaturation of key intersections, which is contrary to the Territory Plan traffic criteria.

Additional and up to date data and modelling is required to fully assess the traffic impacts of the proposed development and the adequacy of proposed mitigation measures. These have not been adequately assessed and do not comply with the strict conditions of the ACT Planning & Land Authority's Group Centres Development Code.

b. Safety

Dickson Place "Road A" is currently used a primary thoroughfare by pedestrians. Design changes should be made to the development to improve road and pedestrian safety. For example, the proposed basement entry and exit ramps have inadequate sightlines. Although a detailed assessment of compliance with AS2890.1 is proposed to take place after detailed design, an assessment of safety must not be deferred.

Heavy vehicle loading dock access from Antill Street should be also constructed as a road profile, and not a driveway, to avoid a significant safety issue.

c. Public transport

Access to public transport is paramount to achieve good modern urban planning outcomes. Any compromise in accessing public transport will result in a negative impact to the existing economic performance of the centre. Changes should be made to ensure that access to public transport connections, including the Antill Street bus stop, is retained and uncompromised by the development of the site.

d. Parking

The development application includes inadequate information to enable the proper assessment of staff parking requirements and the impact of staff parking on available retail and replacement parking. The development does not specifically address the provision of long term free parking,

which is currently enjoyed by the local community on the site. A further breakdown of the required parking is outlined in the report from McLaren Traffic Engineers.

### 3. Planning

For the reasons set out in detail in the Urbis Report, the proposed development fails to address basic design principles, such as pedestrian safety and connectivity.

The development does not facilitate “open and accessible pedestrian access through the centre” which is an objective in the Desired Character Statement in the Dickson Precinct Map and Code. The current design has ‘overdeveloped’ the footprint of the site, by expanding the development to accommodate vehicular access within public areas. This is the result of maximising retail floor space to the detriment of good planning principles.

### Conclusion

The development as proposed fails to achieve basic standards associated with good urban design and amenity and the current application should be refused on this basis.

The enclosed reports describe these issues in detail and also indicate the changes which could be made in order for the development to achieve the desired character, objectives and requirements of the Territory Plan.

Yours faithfully



14/02/2019

Bradley Allen Love Lawyers  
9th Floor Canberra House,  
40 Marcus Clarke Street  
Canberra, ACT, 2601

Architecture  
Urban Design  
Planning  
Interior Architecture

To: [REDACTED]  
Senior Associate

**Architectural and Urban Design Review for submission to –  
Development Application for Dickson Village at Block 21 Section 30  
For land fronting Antill St, Badham St and lanes at Dickson, Canberra**

Dear [REDACTED]

Thank you for your request for me to provide this architectural and urban design review of the above DA (architectural drawings and perspectives by Turner dated 14.12.18 and landscape drawings by Turf dated 20.12.18). As background, I have reviewed an earlier DA and appeared in Court as an expert urban design witness against that DA.

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www.architectus.com.au

This review is focussed on the subject DA and makes no reference to the previous DA.

Adelaide  
Auckland  
Brisbane  
Christchurch  
Melbourne  
Sydney

**General comment**

The current architectural scheme does not meet some basic urban design and amenity objectives let alone be of good design appropriate to the Dickson Centre in its current form. The issues identified below are fundamental to be addressed before approval should be contemplated. In order to be helpful and to illustrate an acceptable way to address the issues, I have made suggestions below for improvements as the minimum necessary to achieve a good outcome in terms of public domain quality, pedestrian amenity, residential amenity and urban design quality.

For convenience I have structured this review in the order of the architectural drawings rather than by issue.

**Architectural and Urban Design Issues**

**1. Ground Plan**

- a. The proposed Dickson Square should be regular so that the south east corner of the site presents as two sides to the square – not as 4 staggered frontages.

Reason: Visual clarity and usefulness of the public domain.

- b. There should be a thickly vegetated landscape setback to Antill St of preferably 8m but 4m is acceptable given the wide road verge.

Reason: Consistency with landscape character of Antill St, to reduce visual presence of the loading dock ingress/egress, and to provide sufficient space for a second row of trees.

Note – a 4m wide landscape setback to Antill St could be achieved by reducing the depth of retail along the southern edge of the proposal and slightly reducing the floor area of the supermarket. The consequential changes elsewhere in the proposal are straight forward.

Architectus Group Pty Ltd  
ABN 90 131 245 684

Nominated Architect  
Managing Director  
Ray Brown  
NSWARB 6359

- c. Visual interest is needed to the solid walls facing Antill St such as public art/special architectural treatment. The Amended Design has plants growing on the solid walls – this is an acceptable part solution providing such landscaping can be assured by soil volume and irrigation (currently there is no room for soil volume on the site) – more variety is needed for such a long frontage such as locations for public art. No planting area is shown in the landscape plan within the boundary of the site.

Reason: Visual interest and streetscape quality.

- d. External walls to the supermarket must be glazed with clear glass and adjacent low-level product displays internally so that the line of sight from the footpath is drawn into the supermarket (i.e. windows to Antill St and Badham St). A development condition is needed to ensure low level displays of goods adjacent the street windows along Antill St and Badham St.

Reason: Visual interest and activation.

- e. The vehicle ramps within the lanes must be relocated to be wholly within the site. They should be located as close as possible to Antill St - preferably shopper parking ingress should be from Badham St and shopper parking egress should be co-aligned with the residential parking egress.

Reason: Pedestrian amenity and safety, integration of the new development with the existing shopping centre, appropriate relationship with the heritage listed Dickson library building, and better interface across the lane with potential development of the adjacent property west of Woolworths. I have considered the issue of the ramp locations very carefully and consider that the benefits of continuous footpaths around the site do not outweigh the reasons.

- f. Vehicle entry/egress points to/from the site should have external finishes continue into the entry as far as a pedestrian on the public footpath can see. Services, pipes and ducts should be screened from public view.

Reason: Public domain interface amenity.

- g. Read in conjunction with the landscape plans, tree planting at least at 8m centres should be along both street and lane frontages in the footpath. It is noted that the spacing of trees along the Antill St frontage within the road reserve has gaps that are too wide. The north elevation shows gaps of 22m.

Reason: Pedestrian comfort and amenity and integration with the Dickson Centre.

- h. The travelator and lifts from the basement parking should link direct to the public domain of the proposed Dickson Square, not into a lobby of the supermarket, so that shoppers are encouraged to disperse throughout the Dickson shopping centre.

Reason: Public domain amenity, activation, equitable access to the wider centre, and the importance to link public parking to the public domain not through private property.

- i. Columns in the supermarket lobby should be removed or re-aligned to the glazed wall.

Reason: Pedestrian amenity, pedestrian circulation with trolleys and clear sightlines.

## 2. Basement 1 Plan

- a. Remove this level of basement area in the laneway.

Reason: To provide soil volume for trees. Trees should not be in planters but should be treated like other street trees in the public domain of the village centre – that is, the base of the tree flush with the footpath and sufficient soil depth to allow full growth to maturity. It is noted that the landscape plans show trees in planters in the lanes – this is unacceptable for the amenity of the public domain, creates additional barriers to pedestrian circulation and is inconsistent with the treatment conditions of other trees in the village centre public domain.

- b. Remove vehicle ramps from beneath the lanes.

Reason: Maintain the public domain free of private development, barrier free pedestrian environment, pedestrian amenity, ease of pedestrian circulation between the proposal and the existing shopping village, visual interface with the library which is a heritage building, and to provide for trees along the lane footpaths.

## 3. Basement 2 Plan

- a. No comments.

Note: Parking can extend in the fashion proposed under the lane at this level because there would be sufficient soil depth above for trees in the lane and the soil depth would be contiguous with soil that has no structure beneath.

## 4. First Floor Parking Plan

- a. Regularise the south east part to suit a re-aligned Dickson Square discussed in Point 1a above.
- b. The Antill St frontage should be recessed 3m between the corner-built forms of the residential above to provide a visual gap between the ground floor and the residential above.

Reason: To provide visual interest to Antill St and to give visual prominence to the residential uses facing Antill St.

Note:

1. I have considered the merit of a setback at this level above the podium to the residential floors to assist in breaking down the bulk of the building – however, I recognise that the proposal presents a built form parallel to the street alignment without setback above podium which is consistent elsewhere in Canberra of similar height apartment buildings – and therefore on balance consider that no further building setbacks are needed (except for the Antill St setback at ground level for the whole building referred to in Point 1b above).

## 5. Level 2 Plan and Typical Floor Plan

- a. The residential floor plate should be broken into at least two building floor plates separated by a 10m gap.

Reason: Break down the scale of the building from a 104m long building by creating two x 40+m long buildings above the podium, interface with the public domain, internal amenity by shortening the common corridors, and more corner apartments for better aspect and cross ventilation.

Note:

1. Residential buildings longer than 60m are visually monolithic, overwhelm the public domain, and contribute to social anonymity.
  2. The gap will cause a loss of apartment yield. It would be acceptable in urban design terms to either extend the residential building along Badham St or to add a floor to each corner-built form of Antill St to compensate loss of floor space.
  3. Linking transparent narrow bridges in alignment to the internal common corridor would be acceptable for each level.
- b. Shorten the internal corridor on each level consistent with Point 5a above.
- Reason: The proposed internal corridor on each level is far too long at 104m long and services 28 rooms on each level – far too many rooms. Such an uninterrupted long length contributes to social anonymity and an institutional atmosphere. Social interaction and cohesion is encouraged by smaller groups of apartments up to 6-8 per floor where it is easier for neighbours to get to know each other.
- c. Provide variety in the design of the internal corridor such as wider parts of the corridor especially around lifts and views to the outside where people gather, wide and narrow recessed entries, and sidelight translucent windows to apartment entries.
- Reason: Visual interest, identity, comfort, and amenity.
- d. Provide additional residential amenities to the podium top such as a barbeque, children's play area, and a common room suitable for table tennis/meetings.
- Reason: residential amenity, common facilities for all ages, and social cohesion.
- e. Internal common corridors to have outlook and natural ventilation by having external windows at the ends of corridors in direct line of sight of the length of the corridor and the lift lobbies.
- Reason: Occupant amenity, environmental legibility and sustainability.
- Note: The proposal provides three external windows to the internal corridors on each level. Two of the windows are not in alignment of the corridor and the long length of the corridor mitigates their utility.

## 6. Elevation North (Antill St)

- a. Extend the Antill Street corner-built form treatment by another bay along Antill St at both ends.

Reason: To visually reinforce the importance of Antill St, and to ameliorate visual impression and building length

- b. Generally, lighten some external colours or provide contrasting lighter accents.

Reason: Visual interest. The current colour selection presents sombrely and presents heavily.

- c. All north facing windows wider than 1m without shading are to have window hoods for sun shading.

Reason: Occupant comfort and sustainability.

- d. Break the horizontality of the podium with vertical separation/articulation.

Reason: Pedestrian scale and visual interest.

- e. Provide variety to the balustrade design.

Reason: Visual interest and streetscape/public domain interface

Note: Except for the corner apartments, all apartments have the same balustrade design resulting in visual monotony.

#### 7. Elevation East

- a. Canopy over Dickson Square should be removed.

Reason: scale relationship with the heritage library building.

- b. Apartment windows and balconies to have moveable external shades.

Reason: occupant comfort and sustainability

- c. Break the horizontality of the podium.

Reason: pedestrian scale and visual interest.

#### 8. Elevation South

- a. Canopy over Dickson Square should be removed as discussed in Point 7a.

- b. Break the horizontality of the podium.

Reason: Pedestrian scale and visual interest.

#### 9. Elevation West

- a. Apartment windows and balconies to have moveable external shades.

Reason: Occupant comfort and sustainability.

- b. Break the horizontality of the podium.

Reason: Pedestrian scale and visual interest.

#### 10. Section BB

- a. The development to be setback at least 4m from the property boundary to enable thick vegetation landscaping as discussed in Point 1b.

#### 11. Additional issues

- a. Designate outdoor areas in Dickson Square for café seating generally out of direct paths of pedestrian movement

Reason: Public domain legibility and pedestrian amenity.

- b. The proportion of apartments with good solar access needs to be increased from less than 50% to at least 70%.

Reason: Residential amenity, consistency with the ACT Multi-Unit Housing Code, and such a freestanding site should be able to achieve greater than 70%.

- c. The proportion of apartments with good natural ventilation needs to be increased to at least 60%. This means windows opening on two sides of an apartment. Note: single aspect apartments that are wider than they are deep with ceiling fans would be acceptable.

Reason: Residential amenity.

- d. Apartment diversity by number of bedrooms is needed. I have been unable to check this aspect for lack of apartment layout plans. There appears to be too many small apartments.

Reason: Social diversity in a development.

- e. Provide a public art strategy inspired by local history and culture for ground level external solid walls and the proposed Dickson Square.

Reason: Public domain amenity, visual interest and sense of place.

### **Conclusion**

The above points are made in the light of the local planning policies and objectives and good practice urban design. Serious attention is needed to address each point. The development is capable of being of good urban design, but this must be demonstrated through design amendment.

Regards



Director Urban Design and Planning

## M<sup>C</sup>LAREN TRAFFIC ENGINEERING

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Division of RAMTRANS Australia ABN: 45067491678 RPEQ: 19457

Transport Planning, Traffic Impact Assessments, Road Safety Audits, Expert Witness

28th February 2019

Reference: 190040.01FB

A. Bradbury & Bradley Allen Love Lawyers

9th Floor Canberra House, 40 Marcus Clarke Street, Canberra ACT 2601

Attention: [REDACTED]

### RESPONSE IN REVIEW OF DOCUMENTS OF THE PROPOSED MIXED-USE DEVELOPMENT AT DICKSON GROUP CENTRE, BLOCK 21, SECTION 30, DICKSON ACT 2602

Dear [REDACTED]

Reference is made to your request to provide a Response in Review of Documents in relation to the Proposed Mixed-Use Development at Dickson Group Centre, Block 21, Section 30, Dickson ACT 2602. M<sup>C</sup>Laren Traffic Engineering has reviewed the documents listed in **Section 1**, noted comments of key documents in **Section 2**, and listed our key findings in **Section 3** of this letter.

#### **1 Documents Reviewed**

1.1 M<sup>C</sup>Laren Traffic Engineering has reviewed the following legislative codes, documents, expert reports and statements to formalise our findings to produce a detailed and informed response:

- a) *Access Compliance Report by Indesign Access (DDAJ0497\_181220) – 20 December 2018;*
- b) *ACAT, AT 43 & 44 of 2016: Expert Report of Christopher Coath: Transport Impact Evidence by GTA Consultants (Ref: N107680) – 21 November 2016;*
- c) *ACAT, AT 43 & 44 of 2016: Expert Report of Tim Rogers (Ref: 10330/1), 14 November 2016. Filed by Bradley Allen Love Lawyers for the Applicant (Charter Hall Retail REIT);*
- d) *ACAT, AT 43 & 44 of 2016: Expert Report of Tim Rogers (Ref: 10330/2), November 2016. Filed by Bradley Allen Love Lawyers for the Applicant (Charter Hall Retail REIT);*
- e) *ACAT, AT 43 & 44 of 2016: Meeting and Joint Report of Experts – 1 November 2016;*
- f) *ACAT. AT 43 & 44 of 2016: SoE, Graeme Shoobridge – 23 November 2016;*
- g) *ACAT. AT 43 & 44 of 2016: SoE, Timothy Nell – 25 November 2016;*
- h) *ACAT, AT 43 & 44 of 2016: SoFC, Alan Bradbury for Charter Hall – 14 November 2016;*
- i) *ACAT, AT 43 & 44 of 2016: SoFC, Felicity Rourke for Coles – 14 November 2016;*
- j) *ACAT, AT 43 & 44 of 2016: SoFC, Pamela Mathie for ACTPLA – 21 November 2016;*
- k) *ACAT, AT 43 & 44 of 2016: Tribunal Decision – Date of Orders: 29 March 2018;*
- l) *ACT Planning and Land Authority and Coles Group Property Developments Limited (Coles) – Dickson Section 30 Block 21 Deed of Variation (Series 1) (DI2015-250) – 4 April 2014;*
- m) *ACT Territory Plan 2008 Legislation (including relevant codes);*
- n) *Community Consultation Report by Knight Frank (256921) – December 2018;*
- o) *Dickson Group Centre Intersections Upgrade by Brown Consulting (C13152) – March 2014;*

- p) *Dickson Mixed Use Architectural Statement by Turner – December 2018;*
- q) *Dickson Mixed Use Development Schedule by Turner – 28 November 2018;*
- r) *Dickson Precinct Traffic and Parking Study by SMEC (3002303) – 25 July 2012;*
- s) *Dickson Traffic Modelling Technical Note by SMEC (3002363.107) – 6 August 2014;*
- t) *Noise Management Plan by Renzo Tonin & Associates (TJ35702F01) – 17 December 2018;*
- u) *Pedestrian Wind Environment Statement by Windtech (WC036-01F2) – 7 May 2014;*
- v) *Stage 1 Feasibility Road Safety Audit Peter Meredith Consulting – July 2014;*
- w) *Statement Against Criteria: Dickson Village by Knight Frank (256921.09) – December 2018;*
- x) *Traffic Impact & Parking Assessment by Mott MacDonald (332299) Rev. D – 1 July 2014;*
- y) *Traffic Impact & Parking Assessment by Mott MacDonald (338212) Rev. D 11 August 2014;*
- z) *Traffic Impact Assessment by Brown Consulting (C12182) Rev. 2 – 15 March 2013;*
- aa) *Traffic Impact Assessment by Northrop (CR181746\_EC01) Issue 1.3 – December 2018;*
- bb) *Urban Design Expert Review by Michael Harrison – 14 February 2019;*
- cc) *Waste Management Plan by Sellick Consultants (181174-181127) – 20 December 2018.*

1.2 *McLaren Traffic Engineering* has reviewed the following plans (both currently proposed and superseded) to formalise our findings to produce a detailed and informed response:

- a) *Anticipated Parking Availability During Closure of Block 21 30 Dickson (20160919\_094101);*
- b) *Traffic Relevant Extracts of Transmittal 170301. ACAT – Updated Plans (24 February 2017).*

1.3 It is worthy to note *McLaren Traffic Engineering* has requested the following documents and plans, which when reviewed and considered, may alter the final view and findings:

- a) Existing Dickson Group Centre economic impact assessment;
- b) Approved DA of Woolworths at 1 Dickson Place, Dickson ACT 2602;
- c) *ACTPLA's* assessment and consent conditions of approval in relation to the above DA approved Woolworths;
- d) Previously submitted DA plans relating to traffic and parking;
- e) Any Deed of Authority between the *ACT Planning and Land Authority (ACTPLA)* and businesses in the Dickson Group Centre, specifically those surrounding the subject site, 'Block 21'.

Throughout the reports, the existing onsite parking has been mentioned as 236, 240 and 242. It would be good to clarify the exact number. For calculating replacement parking rates and shortfalls, where this value has been inconsistent, the existing parking has been assumed as the lowest value of 236. On clarification of the existing provision, these values can be updated.

## **2 *McLaren Traffic Engineering (MTE) Comments of Reviewed Key Documents***

### **2.1 *ACAT, AT 43 & 44 of 2016: Tribunal Decision – Date of Orders: 29 March 2018.***

**MTE:** In reference to the proposed development's parking requirements, the 2016 application that was approved, provided a greater shortfall of parking than that of the 2015 application that was refused.

*Contentions 38, 39, 42, and 56 – MTE* agrees the proposed development's traffic impact will result in major traffic congestion of the primary intersections servicing the Dickson Group Centre, as well as pedestrian safety and vehicular hazard concerns (specifically the loading bay access from Antill Street).

*Contentions 219 and 220 – MTE* agrees, with respect to all documents reviewed as a part of *MTE's* review, that the service, delivery and general access to the site, pedestrian and cycle routes and the proposed development's traffic impact on the existing amenity of the Dickson Group Centre have not been adequately assessed, resulting in a development application unfit for approval as it does

not comply with the strict conditions of the *ACT Planning & Land Authority (ACTPLA)*'s *Group Centres Development Code*.

*Contentions 237 to 245* – *MTE* agrees with the Tribunal's concern regarding the increased risk to pedestrian safety along Dickson Place 'Road A', as a direct result of this proposed development and the placement of the access and egress basement ramps within Territory land on the existing carriageway. This is contrary to the safe and efficient environment expectations and requirements in the *Deed* between the *ACTPLA* and *Coles*, thus, resulting in a proposed development application that "*falls far short*" of one which would fit the existing desired character of the Dickson Group Centre.

## **2.2 Traffic Impact Assessment by Northrop (CR181746\_EC01) Issue 1.3 – December 2018.**

**MTE:** *MTE* agrees with the statement, with respect to the intersection of Antill and Badham Streets, that "*the introduction of the development due to traffic generation ... results in the intersection becoming oversaturated*". The traffic impact of the proposed development on this intersection will see the weekend peak queues increase from 108 metres to 410 metres (the data is unclear if it refers to metres or vehicles, the lesser of the two has been taken). This queue from the Antill and Badham Street intersection will bank traffic back to beyond the Antill and Melba Street intersection to the east.

With reference to this report and the others reviewed, *MTE* does not agree that oversaturation is isolated to this intersection as a result of this proposed development. *Northrop's* isolated assessment of the intersection of Antill Street and Dickson Place 'Road A' show queue lengths (approximately 68 metres) exceed the physical road distances; and are almost five (5) times that of the existing 'LoS C' queues.

The report identifies a requirement of 701 parking spaces for the proposed development, and proposes a provision of 655 spaces, of which 449 are available for public use to service the existing Dickson Group Centre and proposed retail, commercial shops and residential visitors.

The podium level is stated to include 206 spaces. *MTE* does not accept that the 23 remaining spaces (as a minimum of 183 must be allocated to residents) will be adequate to meet the parking demand of the required operational staff (retail, commercial shops and centre management of the proposed development). It is recommended a breakdown of staff parking requirements per tenancy is provided to stipulate the staff parking does not overflow into the insufficient retail and replacement (of existing) parking allocation.

As per the *Deed* between the *ACTPLA* and *Coles* there is a requirement to provide car parking fees not exceeding the amounts set out in the *ACT Road Transport (General) (Pay Parking Area Fees) Determination 2015 (No 2)*. No reference to this is made in the reviewed development applications for either the temporary sealed parking required during the construction period at Block 13 Section 72, Dickson or the subject site, Block 21 Section 30, Dickson.

## **2.3 Urban Design Expert Review by Michael Harrison – 14 February 2019.**

**MTE:** It is noted that the expert advice recommends the removal of the proposed access and egress ramps along Dickson Place 'Road A' as the proposed development should remain an existing public domain and be free of private development.

This advice is in alignment with the below extract from the *ACTPLA's Group Centres Development Code* and the *Dickson Precinct Map and Code* as well as the *Tribunal Decision Contentions (Date*

of Orders: 29 March 2018) with reference to traffic and parking. This advice is fully supported by MTE as in our view, the proposed ramps have inadequate sightlines to ensure safe access and egress to the parking levels (both the public basements and residential / commercial podium) and back into the supporting road network via Dickson Place 'Roads A and B'.

The proposed circulation paths on an already congested, over capacity Dickson Place 'Road A' would be an avoidable safety risk and concern for the existing (and an increased future) pedestrian amenity. Dickson Place 'Road A' is a "Primary Active Frontage" and a main pedestrian access route, as stated and depicted in **Annexure B**.

*"Group Centres Development Code  
Part B – General Development Controls  
Element 1: Restrictions on Use  
Rules 1.2 Existing Car Parks*

*R31 Development on existing car parks (Figures B1 – B17) complies with all of the following:*

- a) Retains the existing level of car parking*
- b) Accommodates onsite any additional demand for car parking that is generated by the development*
- c) Ensures that car parking remains available for public access*
- d) Complies with the Parking and Vehicular Access General Code*

*Criteria 1.2 Existing Car Parks*

*C31 Development on existing car parks (Figures B1-B17 may be considered where it meets all of the following:*

- a) In accordance with the Parking and Vehicular Access General Code, there is enough car parking for the needs of the centre as a whole*
- b) The development does not affect the overall function of the centre in terms of economic, social, traffic and parking and urban design impacts."*

The proposed development is contrary to and does not meet the ACTPLA's *Group Centre Development Code's Rules and Criteria*. In view of the foregoing, ACTPLA's considered view must be to refuse the proposed development for approval based on the non-compliance with the above criteria of ACTPLA's *Development Codes*. Specifically, the requirement of the level 'at-grade' quantity of parking to be retained, in addition to the parking provision required for the proposed development.

### **3 Key Findings and Comments**

#### **3.1 Removal of existing parking during the construction period**

The length of the construction period will negatively impact on the existing economic performance due to the reduction of traffic and parking convenience and pedestrian / customer access to the Dickson Group Centre. The proposed development application fails to mention the requirement to provide a minimum of 74 "two-coat seal pavement" spaces, to the east of the site across Cowper Street on Block 13 Section 72 Dickson (before any commencement works at Block 21, the subject site, can begin), as per the *Deed* between the ACTPLA and Coles.

The removal of the existing drop-off and pick-up zone within Dickson Place 'Road A' will cause an adverse effect to the existing pedestrian, traffic and economic operation of the Dickson Group Centre. Again, contrary to the *ACTPLA's Group Centre Development Code's Rules and Criteria*.

### 3.2 Inadequate parking provision

The proposed development application fails to provide an adequate parking provision for long term use of the site as well as during the construction phase(s), in accordance with the *ACTPLA's Group Centres Development Code* and the *Dickson Precinct Map and Code*. A breakdown of the required parking provision is outlined below in **Annexure A**. In view of the foregoing, *ACTPLA* can only reject the proposed development based on the non-compliance with the criteria of *ACTPLA's Development Codes*.

### 3.3 Pedestrian and cyclist safety, access and convenience

Currently, pedestrians use Dickson Place 'Road A', as a primary thoroughfare between the existing at-grade car park on the site, to the surrounding commercial services and businesses in the Dickson Group Centre (which in turn rely on the site for patron parking). Significantly increasing the flow of traffic through this road will greatly affect the safety of pedestrians and cyclists, as well as new and existing vehicles in the precinct.

Inadequate sightlines, short and operationally insufficient turning bays will create avoidable pedestrian and traffic safety concerns, in the already (as assessed by each of the aforementioned independent traffic and parking impact assessments) over capacity Dickson Group Centre road network. An inadequate pedestrian level of service has been assessed in relation to the primary access corridors at street level.

*MTE* recommends that if the site is to be considered fit for a future proposed development, as a minimum requirement, a carpark at the existing grade should be incorporated into the design to ensure the *ACTPLA's* rules and criteria of developments to existing car parks are achieved.

### 3.4 Loading bay access from Antill Street

In the expert opinion of *MTE*, allowing heavy vehicle access from Antill Street, a major collector road already exceeding the desired traffic, is a huge safety issue. If this is deemed an acceptable risk by the consent authority, it is recommended that the access to the proposed site be designed and constructed as a road profile, rather than that of a driveway profile, ensuring bicycles, pedestrians and other vehicles using Antill Street give way to the HRV and MRV's turning into the site.

Secondly, the removal of the bus stop along the site's Antill Street boundary will reduce the convenience of access to existing Dickson Group Centre patrons who rely on this service.

### 3.5 Public transport interface (sustainable outcomes)

Public transport and the bus stop on Antill Street should be retained as vital public transport connection, rather than being subservient to the proposed loading dock.

### 3.6 Inadequate road network capacity

With the conflicting reports and daily / peak vehicular assessments of the existing road network surrounding and servicing the Dickson Group Centre (Antill Street, Badham Street, Cowper Street and the three Dickson Place's [Dickson Place along The Dickson Tradies frontage and 'Road A' and

'Road B', as referred to in the reviewed documents]), an adequate traffic impact assessment of the proposed development is speculative at best.

The approximate additional 867 weekday and 852 weekend per hour trips have not been adequately assessed with respect to the existing road network traffic volumes and capacity with a detailed network analysis needed to prove the proposed developments viability.

### 3.7 Microsimulation

Given the complexity of the immediate road network, it is highly recommended that a microsimulation package such as Paramics or AIMSUM, should be employed to replicate the existing 'Levels of Service' for intersections around the subject site and to model the changes.

## 4 4. Conclusion

In conclusion, it is clear to *MTE* that all documents reviewed in reference to the proposed development have failed to:

1. adequately assess the existing traffic and parking conditions;
2. adequately assess impact the impact of the proposed development on the surrounding road network;
3. adequately provide a safe and compliant design that ensures pedestrian and cyclists safety with respect to the service / loading bay access from Antill Street (as well as associated traffic congestion);
4. to provide an adequate supply of parking (including an allowance for circulation) both during the construction period and future operation of the proposed development.

When you consider the site holistically, it is questionable whether the at-grade car park should ever be approved for redevelopment with any proposal requiring an onsite commercial (retail) scale loading dock, as each of the property boundaries, Antill Street (a key public transport interface), Dickson Place (a primary active frontage for pedestrians and cyclists) and Badham Street (a key access corridor to the Dickson Group Centre) are vital to existing operation, where removal of any would adversely affect the Dickson Group Centre.

Please contact Mr Tyler McLaren or the undersigned on 02 8355 2440 should you require further information or assistance.

Yours faithfully,

**McLaren Traffic Engineering**



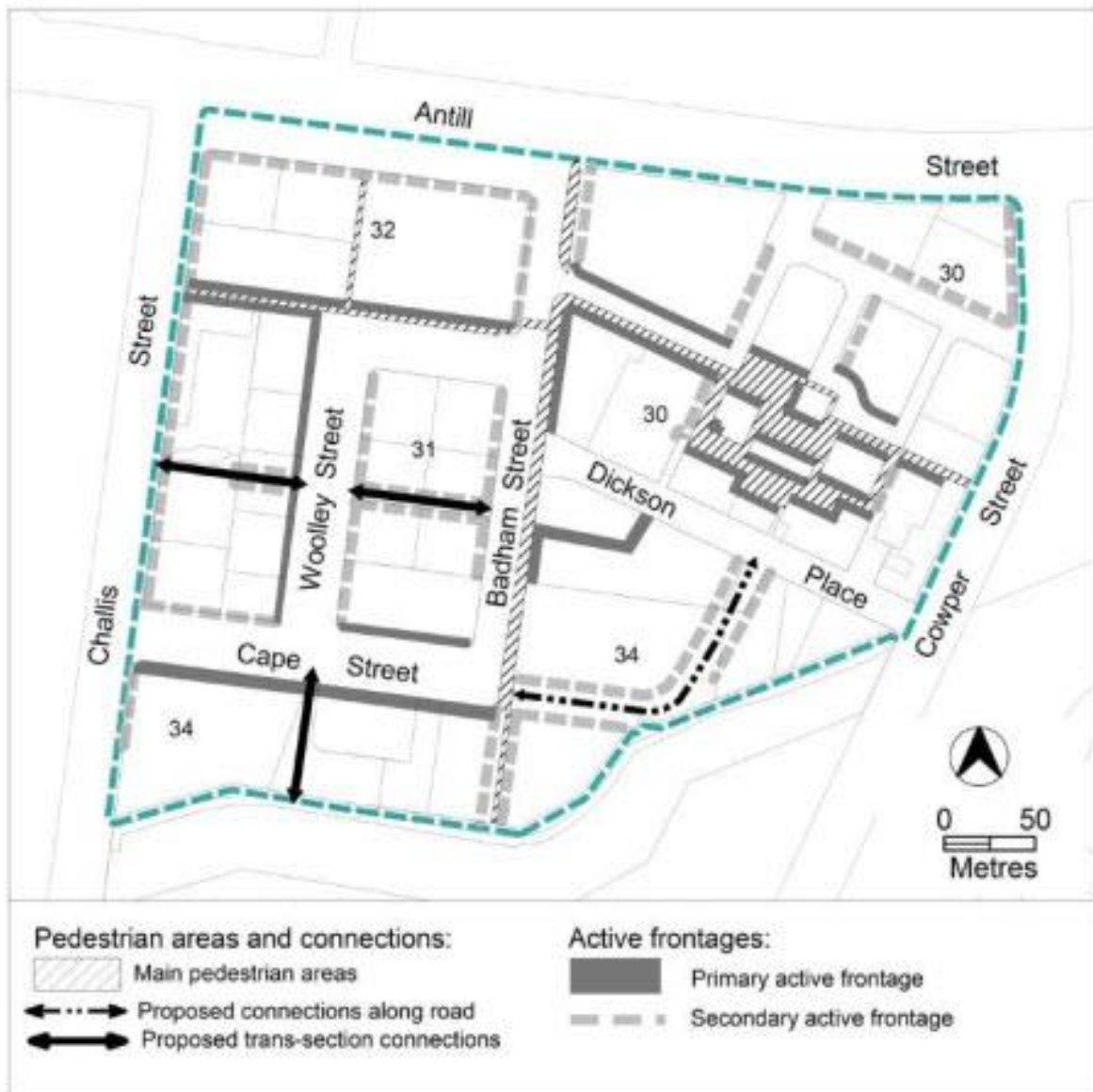
**Director**

BE Civil, Grad Dip (Transport Engineering), MAITPM, MITE  
RPEQ 19457  
RMS Accredited Level 3 Road Safety Auditor [1998]  
RMS Accredited Traffic Management Plan Designer [2018]

## ANNEXURE A: SUMMARY OF PROPOSED DA PARKING REQUIREMENTS (PAGE 1 OF 1)

ACT Parking Requirements Proposed Dev: Block 21, Section 30	Reports/Plans from which information was extracted:				2013		2014		2016		2017		2018	
	Brown (C12.182)	Matt MacDonald (B382.12)	GTA Consultants (N107680)	BLOC ACAT PLANS (DA10.01D)	NORTHROP (CR18.1746_EC01)	QTY	QTY	QTY	QTY	QTY	QTY	QTY	QTY	QTY
<b>Group Centre Car Parking</b>	1	60.00	135	70	70.00	70	70.00	70	70.00	70	70.00	70	70.00	
<b>Residential Apt</b>	1.5	90.00	5	7.50	82.50	5	82.50	5	82.50	5	82.50	5	82.50	
Two (MIN)	2	60.00	15	30.00	30.00	15	30.00	15	30.00	15	30.00	15	30.00	
Three (MAX)														
or														
One Bed	1	210.00	135	172.50	182.50	189	189	189	189	189	189	189	189	
Two	2	120.00	5	10.00	110.00	5	110.00	5	110.00	5	110.00	5	110.00	
Three +	2	60.00	15	30.00	30.00	15	30.00	15	30.00	15	30.00	15	30.00	
Visitor Apt.		240.00	REQ	175.00	210.00	REQ	210.00	REQ	210.00	REQ	210.00	REQ	210.00	
Spaces / Dwelling	0.25	37.50	155	38.75	35.00	140	35.00	140	35.00	140	35.00	140	35.00	
Retail		37.50	REQ	38.75	35.00	REQ	35	REQ	35	REQ	35	REQ	35.00	
Spaces / m2	0.05	5000	250.00	4737	236.85	4821	241.05	4815	240.75	3830	191.50	3830	191.50	
Shops		250.00	REQ	236.85	241.05	REQ	241	REQ	241	REQ	192	REQ	192	
Spaces / m2	0.05	0	0.00	655	32.75	568	28.40	612	30.00	1068	53.40	1068	53.40	
Commercial / Office		0.00	REQ	32.75	28.40	REQ	31	REQ	31	REQ	54.00	REQ	54.00	
CZ1		5000.00	RETAIL TOTAL	5392.00	5389.00	RETAIL TOTAL	5427.00	RETAIL TOTAL	5427.00	RETAIL TOTAL	4898.00	RETAIL TOTAL	4898.00	
Replacement Parking		1000	10.00	480	4.80	480	4.80	480	4.80	480	4.80	480	4.80	
Existing on Site		10.00	REQ	4.80	4.80	REQ	4.80	REQ	4.80	REQ	0.00	REQ	0.00	
No. Taken From Report		10.00	REQ	4.80	4.80	REQ	4.80	REQ	4.80	REQ	0.00	REQ	0.00	
STATED ON SITE		242.00	STATED ON SITE	240.00	236.00	STATED ON SITE	236.00	STATED ON SITE	236.00	STATED ON SITE	237.00	STATED ON SITE	237.00	
REPLACED		242.00	REPLACED	237.00	236.00	REPLACED	237.00	REPLACED	237.00	REPLACED	237.00	REPLACED	237.00	
DIF. OF EXISTING		0.00	DIF. OF EXISTING	-3.00	0.00	DIF. OF EXISTING	NA	DIF. OF EXISTING	NA	DIF. OF EXISTING	0.00	DIF. OF EXISTING	0.00	
TOTAL REQ		749.50	TOTAL REQ	725.65	727.75	TOTAL REQ	724.85	TOTAL REQ	724.85	TOTAL REQ	700.00	TOTAL REQ	700.00	
DEV PROVISION		746.00	DEV PROVISION	703.00	701.00	DEV PROVISION	655.00	DEV PROVISION	655.00	DEV PROVISION	655.00	DEV PROVISION	655.00	
PODIUM LEVEL*		-3.50	PODIUM LEVEL*	233.00	241.00	PODIUM LEVEL*	206.00	PODIUM LEVEL*	206.00	PODIUM LEVEL*	206.00	PODIUM LEVEL*	206.00	
DIFFERENCE		529.50	DIFFERENCE	-22.65	-26.75	DIFFERENCE	-69.85	DIFFERENCE	-69.85	DIFFERENCE	-45.00	DIFFERENCE	-45.00	
RETAIL REQ		529.50	RETAIL REQ	548.35	540.45	RETAIL REQ	542.35	RETAIL REQ	542.35	RETAIL REQ	518.00	RETAIL REQ	518.00	
DEV PROVISION		511.00	DEV PROVISION	470.00	460.00	DEV PROVISION	449.00	DEV PROVISION	449.00	DEV PROVISION	449.00	DEV PROVISION	449.00	
TRUE DIFFERENCE		-18.50	TRUE DIFFERENCE	-78.35	-80.45	TRUE DIFFERENCE	-80.45	TRUE DIFFERENCE	-80.45	TRUE DIFFERENCE	-80.45	TRUE DIFFERENCE	-80.45	
NO VIS.		19.00	NO VIS.	NO VIS.	NO VIS.	NO VIS.	NO VIS.	NO VIS.	NO VIS.	NO VIS.	NO VIS.	NO VIS.	NO VIS.	
DIFFERENCE		19.00	DIFFERENCE	-39.60	-45.45	DIFFERENCE	-58.35	DIFFERENCE	-58.35	DIFFERENCE	-58.35	DIFFERENCE	-58.35	
* The 'Podium' or Level 1 parking provision is not for public use, as such, the number of spaces has been deducted from the total retail, replacement and visitor requirements.														
<b>Motorcycle Spaces</b>		0.03	QTY	2177	2189	QTY	2175	QTY	2175	QTY	2100	QTY	2100	
Motorcycle Spaces		22.49	M.CYCLES REQ	2177	2189	M.CYCLES REQ	2175	M.CYCLES REQ	2175	M.CYCLES REQ	2100	M.CYCLES REQ	2100	
<b>Bicycle Spaces</b>		0.03	QTY	155	155.00	QTY	140	QTY	140	QTY	140	QTY	140	
Residents		150	150	155	11.92	140	10.67	140	10.67	140	10.67	140	10.67	
Resi. Visitors		0.002	0	0.00	1.31	568	1.14	612	1.22	1068	2.14	1068	2.14	
Shop		0.003	0	0.00	0.00	568	1.89	1068	3.56	1068	3.56	1068	3.56	
Shop Visitors		0.001	5000	5.67	5.32	4821	5.43	4815	6.42	3830	4.11	3830	4.11	
Supermarket		0.003	5000	16.67	15.79	4821	16.07	3830	12.77	3830	12.77	3830	12.77	
Supermarket Visitors		0.004	1000	3.00	0.92	480	1.92	0	0.00	0	0.00	0	0.00	
Office		0.001	1000	1.05	0.51	480	0.51	0	0.00	0	0.00	0	0.00	
Office Visitors		187.89	BICYCLE REQ	190.76	177.62	BICYCLE REQ	175.64	BICYCLE REQ	175.64	BICYCLE REQ	173.24	BICYCLE REQ	173.24	
RESIDENT BICYCLE SPACES CAN BE REPLACED BY STORAGE UNITS COMPLIANT WITH 3.2.3														

**ANNEXURE B:  
FIGURE 2 OF ACT DICKSON PRECINCT MAP AND CODE (PAGE 1 OF 1)**



**Figure 2 Main pedestrian areas and active frontages**



**TOWER 2, LEVEL 23  
DARLING PARK, 201 SUSSEX ST  
SYDNEY NSW 2000**

URBIS.COM.AU  
Urbis Pty Ltd  
ABN 50 105 256 228

28 February 2019

ACT Government  
Environment, Planning and Sustainable Development Directorate - Planning  
PO Box 365  
Mitchell ACT 2911

mailto:EPDCustomerservices@act.gov.au

Dear Sir/madam

**DA NO: 2018351109**

**BLOCK 21 SECTION 30 ANTILL STREET, DICKSON**

## **INTRODUCTION**

This submission has been prepared by Urbis on behalf of Charter Hall who are the landowners of the adjacent land to the immediate south of Block 21 Section 30 (Development Site) at 30 Dickson Place. Charter Hall continue to lease their site to Woolworths who operate a supermarket.

Urbis has previously prepared submissions in response to earlier schemes for the site in January 2015 and again in March 2016. In the case of both earlier submissions, in-principle support of the redevelopment of the car park was expressed to deliver the mixed-use outcome envisaged in the Dickson Precinct Plan and the contribution its offers to the revitalisation of the broader Dickson Centre.

This in-principle support was conditional on ensuring that the design was improved to better facilitate the pedestrian connectivity between the development site and the broader Dickson Centre. This broad position remains unchanged and is reflected in this response to the latest plans.

## **BROAD COMMENTS**

Given the number of development scheme iterations that have now been put forward we strongly suggest that all schemes could be viewed as an overdevelopment of the site. This is because all past and current schemes have each sought to maximise the building footprint at the ground plane. As a consequence, there is a need to overly rely on expansion of the site into the public realm to accommodate vehicular access.

In the absence of a plot ratio for the site, there will always be a market tendency to maximise site coverage when building height is capped. This results in a fundamental tension between the design of the ground plane where, in this instance, traffic generated by the development is still being concentrated into the same general area within the precinct as pedestrians.

This is a less than ideal outcome for the quality of public spaces as envisaged in the Desired Character Statement contained in the Dickson Precinct Map and Code. It also results in a situation where all landscaping proposed for the development is proposed outside of the site boundaries. Whilst not previously raised as an issue, it is nonetheless a noteworthy observation.

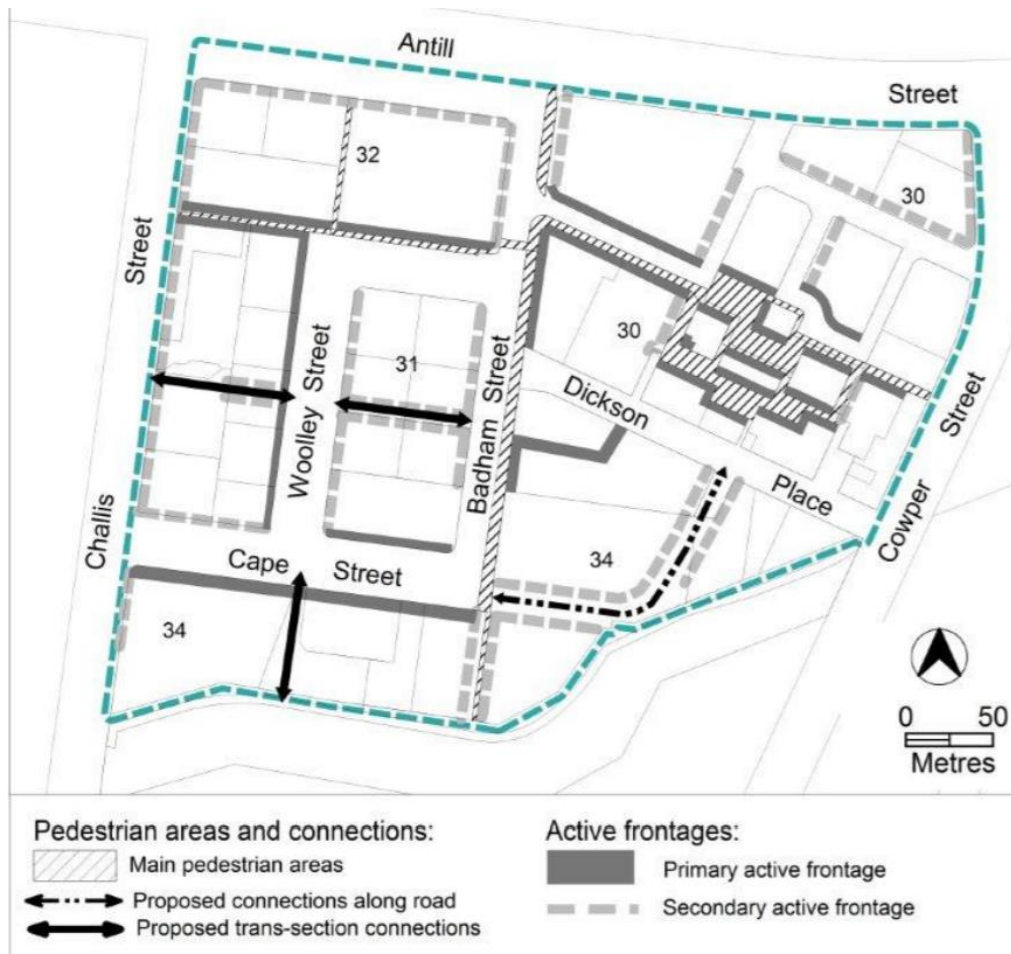
These concerns are reinforced further below and in the supplementary submissions made by Architectus (Urban Design) and McClaren Traffic Engineering (MTE).

## PEDESTRIAN SAFETY

### Street Activation

The Dickson Precinct Map and Code expressly requires the Activation of Street Frontages as per the diagram in Figure 1 below.

Figure 1 – Precinct Map



Implicit in this Rule in my opinion is a prioritisation of pedestrian movement over vehicular traffic on the street (Road A) that separates the Charter Hall/Woolworths site from the development site. This Rule is supported by the overarching objective to facilitate “*open and accessible pedestrian access throughout the centre*”. The achievement of this objective needs to be mindful of the focussing of pedestrian access towards Dickson Square and the community activities adjacent to the square.

I am of the view that the latest proposal still fails for the following reasons:

- The proposed driveway ramp access into the proposed basement still gives rise to a significant pedestrian and visual barrier on what is otherwise the primary active frontage. The submission by MTE highlights that over 850 peak hour trips will be generated by the development. The majority of this will be from the commercial elements of the scheme. This is not an insignificant number and the consequences of such volumes on the full primary frontage of both sides of Road A do not appear to have been properly assessed having regard to:

- Pedestrian safety. I note that the submission by MTE makes the explicit observation as follows:

### 3.3 Pedestrian and cyclist safety, access and convenience

Currently, pedestrians use Dickson Place ‘Road A’, as a primary thoroughfare between the existing at-grade car park on the site, to the surrounding commercial services and businesses in the Dickson Group Centre (which in turn rely on the site for patron parking). Significantly increasing the flow of traffic through this road will greatly affect the safety of pedestrians and cyclists, as well as new and existing vehicles in the precinct.

Inadequate sightlines, short and operationally insufficient turning bays will create avoidable pedestrian and traffic safety concerns, in the already (as assessed by each of the aforementioned independent traffic and parking impact assessments) over capacity Dickson Group Centre road network. An inadequate pedestrian level of service has been assessed in relation to the primary access corridors at street level.

- Pedestrian amenity, particularly noise impacts and visual segregation of the overall activated pedestrian precinct. The Noise Management Plan associated with the DA does not give any consideration to the effects on traffic noise traversing Road A on the quality and amenity of the public spaces within Road A. I note the observations of Architectus in their submission which in part states:

- e. The vehicle ramps within the lanes must be relocated to be wholly within the site. They should be located as close as possible to Antill St - preferably shopper parking ingress should be from Badham St and shopper parking egress should be co-aligned with the residential parking egress.

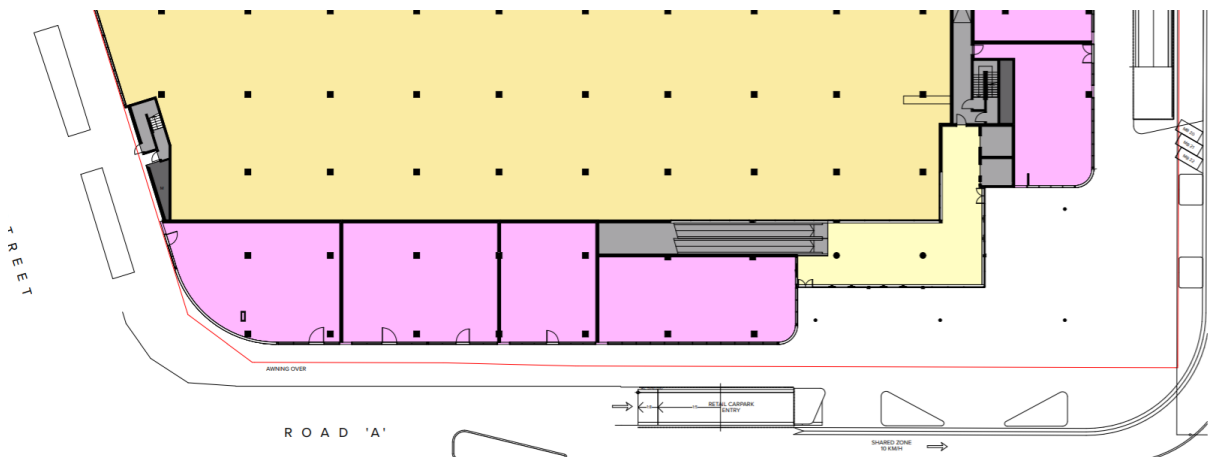
Reason: Pedestrian amenity and safety, integration of the new development with the existing shopping centre, appropriate relationship with the heritage listed Dickson library building, and better interface across the lane with potential development of the adjacent property west of Woolworths. I have considered the issue of the ramp locations very carefully and consider that the benefits of continuous footpaths around the site do not outweigh the reasons.

- The on-going retention of these ramps, particularly the entry ramp in Road A, calls into question precisely what the role and function of Road A should in fact be.

- In my opinion Road A sits at the lowest order of streets within the precinct, with the opportunity to contribute to a fine grained and intimate space where shoppers and pedestrians can mingle and dwell, and cars and vehicle movements play a very much secondary role. The planning objectives call for this by requiring activation along the entire length of both sides of Road A.
- The proposed plans show a row of speciality shops shaded pink fronting Road A as per the extract in Figure 2 below. It needs to be recognised that there is no means to service these shops other than via the front door off the street, precisely at the point where traffic for the overall development is being concentrated towards the entry to the basement access ramp. This in my opinion will lead to:
  - Potential conflicts between service vehicles that will need to park on the street to access these shops;
  - Conflicts with pedestrians as servicing / loading / unloading activities will intersect planned pedestrian flow lines;
  - The internalisation of these retail shops as they adopt measures to ensure shopper amenity is not unduly impacted by traffic noise;
  - The potential difficulty for these shops to be leased due to their poor amenity.

Each of these issues / scenarios above give rise to the potential conflict with the desired character for the centre.

Figure 2 – DA Plan Extract

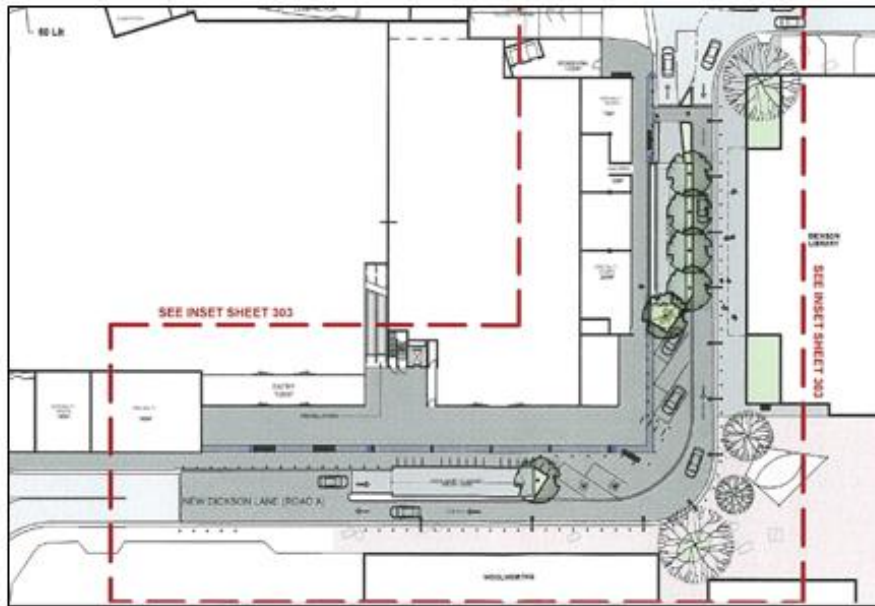


## Pedestrian Connectivity within the Centre

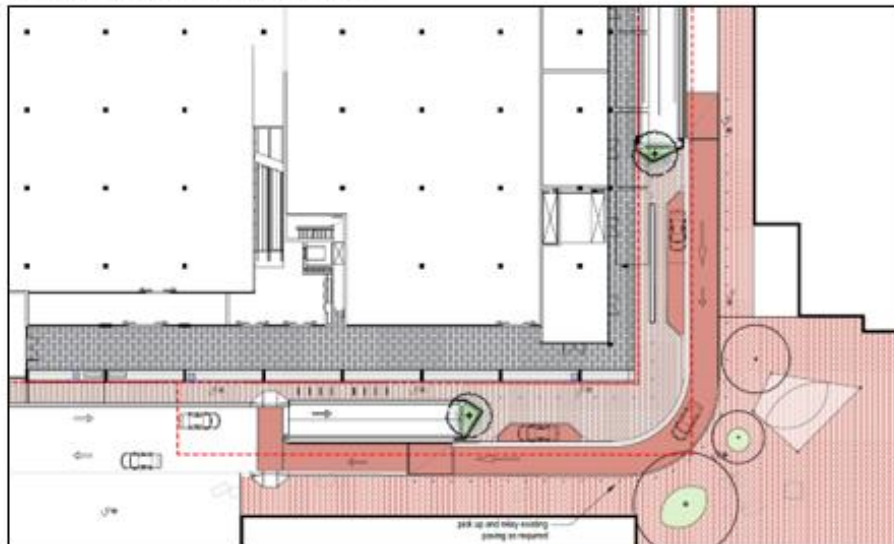
The following diagrams in Figure 3 below are extracts of previous schemes for the site. In our earlier submissions, consistent concerns were raised over the location of the travelators and the opportunity such could provide to better link private and public spaces. The diagrams overleaf show the earlier locations of the proposed travelator.

Figure 3 – Plan extracts previous DA Schemes

GROUND LEVEL PLAN- ORIGINAL SCHEME (2015)



GROUND LEVEL PLAN- REVISED SCHEME (2016)



In our submission to the 2016 scheme, we recommended the realignment of the travelators to provide better connectivity into Dickson Plaza and surrounding land uses.

The latest scheme appears to have made some effort to move the travelator eastward which provided opportunity for a more direct connection into Dickson Square. However, in the latest scheme the travelator continues to remain internalised as per the earlier schemes.

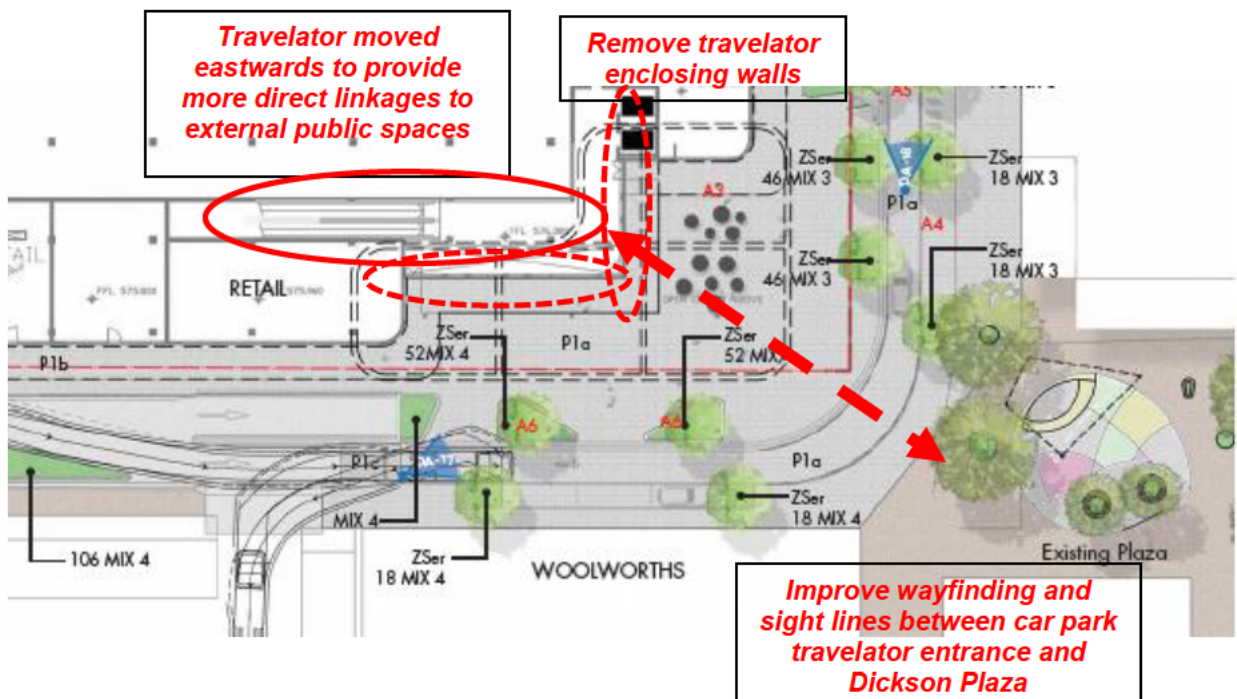
There does not appear to be any information how public access into the travelator is to be maintained on a 24/7 basis given the that the basement car park includes public car parking for the benefit of the entire precinct, including shopper parking for customers of the Woolworths supermarket.

Based on my review of the landscape plan included with the DA documentation, there appears to be opportunity to reconfigure interface between the travelator and the proposed plaza space in the south-eastern corner of the site for the following reasons:

- At present the travelator effectively connects to a proposed supermarket lobby. This in my view has the effect of creating a perception that it is a private space for the exclusive use by the proposed development.
- The enclosed wall around the travelator continues to create a disconnection between a number of public spaces, including the publicly accessible car parking within the basement.

A seamless interface between public, semi-public and private spaces that enables pedestrians to readily identify and logically way-find throughout the entire precinct, particularly when public access extends across ground and below-ground levels must be a key design outcome. This outcome is reflected in the marked-up extract of the latest Landscape Plan in Figure 4 below.

Figure 4 – Landscape Plan Extract: Current Scheme





## CONCLUSION

As per our submission to the original scheme dated 27 January 2015 and our further submission dated 31 March 2016, the Landholder remains supportive of the opportunity to redevelop the site to the north of its landholding and the wider benefits the mix of uses it could potentially bring to the Dickson Centre.

Whilst some improvements have been made, we strongly believe that the latest design still contains elements that fundamentally challenge what the ACT Government is trying to achieve for the Centre.

The concentration of a significant quantities of traffic in key places that are otherwise intended to be pleasant activated streets providing safe and attractive pedestrian amenity continues to act as a major barrier and continues to isolate the site from the wider Dickson Centre. This submission has identified areas where design reviews should be concentrated. The submission prepared by Architectus, also contains recommendations to improve the design. We concur with those recommendations as they specifically relate to issues raised in this submission.

Thank you for the opportunity to comment on this proposal and we look forward to a modified scheme which offers an improved ground level interface. Should you wish to discuss further, please do not hesitate to contact the undersigned on 02 8233 9900.

Yours sincerely,



NSW Regional Director

**From:** [smartforms@act.gov.au](mailto:smartforms@act.gov.au)  
**To:** [EPD, Customer Services](#)  
**Subject:** DA201835109 - REPRESENTATION - [REDACTED] [SEC=UNCLASSIFIED, DLM=Sensitive: Personal]  
**Date:** Thursday, 28 February 2019 3:55:06 PM  
**Attachments:** [99125120190228150603.xml](#)  
[99125120190228150603.pdf](#)

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## Representation for Current Development Application

### Form data summary

**Customer name** [REDACTED]  
**Reference code** SHDQZF

For issues or questions relating to SmartForms please contact the Payment Services Integration Team on \*5 4607 or email [smartforms.admin@act.gov.au](mailto:smartforms.admin@act.gov.au)

# Representation for Current Development Application - submission confirmation

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

Date and time

28 Feb 2019 3:52:55 PM

Reference code

SHDQZF

Thank you for your representation regarding development application number: DA201835109

The issues raised in your submission will be taken into consideration during the assessment of the development application and you will be notified in writing once a decision has been made.

Section 156(2) of the *Planning and Development Act 2007* states that a representation about a development application must be made during the public consultation period for the application. If your representation was made outside the public consultation period it cannot be considered during the assessment of the application.

Please Note: A copy of your representation will be forwarded to the development application applicant and can be released to the public on request, unless you have requested and been granted an exemption.

Access Canberra  
Environment and Planning Directorate

GPO Box 158  
Canberra City ACT 2601

Telephone: (02) 6207 1923

## Representor details

Title Given name \* Family name \*

Ms

Organisation name

Home phone number

0262480706

Work phone number

Mobile number

Email address \*

# Development details

---

## Site details

Development application number \*

DA

Suburb/District \*

Section \*

Block \*

Unit

If you require help with suburb/district, section or block details, visit [ACTMAPi](#).

## Representation

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Provide the details of your representation \*

I am writing to support the proposed development. The provision of housing as part of a mixed use development within the group centre provides a great opportunity for people with limited mobility to live independently even if they are unable to drive. There are medical, dental, physiotherapy and pathology services close to the site and, as well as the existing facilities, there will be a supermarket only a lift ride away.

I am not an expert in accessibility but I understand the report on this to say that the 2 and 3 bedroom flats are to meet adaptable standards. If this understanding is correct then I believe that this development will provide a rare facility for people who are elderly and for others who may find walking/riding to shops a problem. (If not then I would ask that any approvals for the development make this a condition)

You may upload any additional supporting documentation or photos.

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

**From:** [REDACTED]  
**To:** [EPD, Customer Services](#)  
**Subject:** Coles Development Dickson DA 201835109- DCA submission  
**Date:** Thursday, 28 February 2019 3:49:48 PM  
**Attachments:** [DCA submission DA 201835109.pdf](#)

---

Attached is the Downer Community Association submission Coles Development Dickson DA 201835109 currently on exhibition.

Thanks



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This email is intended for the addressee(s) named and may contain confidential and/or privileged information.  
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Applications Secretariat  
ACTPLA  
16 Challis Street  
Dickson 2602 ACT

Email: [esddcustomerservices@act.gov.au](mailto:esddcustomerservices@act.gov.au)

Dear Madam/Sir,

**RE: Development Application 201835109 - Coles Dickson Proposal for Mixed Use Commercial and Residential Development on Block 21 Section 30 Antill Street Dickson.**

Thank you for providing Downer Community Association (DCA) with an opportunity to provide comment on the above development application currently being publicly notified.

#### *Overall Design*

The DCA considers that this new proposal addresses the major concerns that the community groups have raised in with the previous iterations of the proposal and through the ACAT proceedings.

There would seem a lot of positives around the redesigned interface with the surrounding area of the shops. How the new building will address the public spaces of the adjacent heritage listed Dickson library and the existing public square should maintain and improve the public amenity of the area and hopefully proves to be equitable and functional for all parties. Incorporating measures to allow greater ease of public access to the underground parking areas and to the existing Dickson shops will be critical to success of the design.

#### *The Residential Component*

One area where further improvements could be made is the design of the residential component of the development. This is of particular interest to Downer residents as the northern elevation directly faces the residential areas of the suburb.

As recommended previously we would like to see greater emphasis given to breaking up the massing of one continuous façade into two or three discrete residential buildings above the commercial component of the development. This would help address the solar orientation, cross ventilation and long hallway design issues still evident in the residential design. It may also make the design more interesting and aesthetic.

The street appearance of the building over 100 metres in length multiplied by seven storeys would benefit from greater treatment in this way and be more livable and attractive than the currently proposed somewhat superficial indentations into the façade provide.

*Other Northern Elevation appearance from Downer matters*

The greening of the Antill Street ground floor street level around the northern elevation is supported as is larger street trees.

Will this vertical wall garden be mandated as part of the conditions of the determination? This will require a strong commitment for the maintenance of these wall plants and vegetation into future.

*Mid-Block Pedestrian crossing from Downer*

The main pedestrian thoroughfare from Downer mid-block is proposed to be altered from existing arrangements. The rationale for the construction of a pedestrian island traffic island between Block 21 and the Dickson Health Centre is acknowledged. It will allow people once they cross Antill Street to either go west to the Coles building or east towards the rest of Dickson which would appear logical.

The main point for the new traffic island is about safety and the details of materials it is to be constructed from. For parents with prams and other infants would need something substantial and raised concrete consistent with the Aust Standard Code. Without this it could be a more hazardous crossing than present aiming at a relatively small refuge with traffic potentially on both sides.


*Loss of trees*

More than 50 trees are being removed as a result of this development. The proposed replacement trees at ground level will be fewer than half (in terms of numbers) of what is currently there. While acknowledging that it would of course be difficult to retain identical tree cover when such a large development is going in, DCA wishes to highlight the proposed reduction in tree cover (particularly in light of recent local commentary on how Canberra is losing 3,000 trees a year), and emphasising that the DCA and community members will be keeping a very close eye on the replacement trees. Any further reduction in trees planted from what is currently proposed would be viewed very poorly. Maybe Coles could fund planting a grove of trees else where in Dickson Section 72 as an urban green offset?

If you have any further questions or points of clarification, please contact undersigned in this regard.

Kind regards



**From:**   
**To:** [EPD, Customer Services](#)  
**Subject:** Submission on DA201835109 for Block 21 Section 30 Division: Dickson  
**Date:** Thursday, 28 February 2019 3:10:08 PM  
**Attachments:** [Submission on Coles complex DA 28 Feb 2019.docx](#)

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I have attached a submission in response to Development Application 201835109 for Block 21 Section 30 Division: Dickson.

Thank you



3pm 28 February 2019

## **Index and Summary**

Submission on Development Application No: 201835109 Block: 21 Section: 30,  
Division: Dickson

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28 February 2019

## Introduction

I submit the attached comment on the Block 21, Section 30 Development Application as a long-term and frequent user of the Dickson Group Centre and the adjacent Section 72.

Much of the following input reflects not just personal views but also those of others I know who use the wider Dickson precinct on a regular basis.

I wish to be able to support the whole precinct's service, retail, social and recreational and other opportunities for many years to come.

Many of my comments are in line with the ACT Government's often reiterated planning philosophies of 'putting people first', encouraging and supporting 'active travel' and making our city more liveable, accessible, and also more resilient to worsening climate change effects.

While accepting that some necessary improvements have been made to the site's proposed developments since March 2018, my comments also address major traffic impact concerns which the Development Application's own Traffic Impact Assessment (TIA) by Northrop Consulting Engineers<sup>1</sup> reinforces, in its many assessments of 2018 and future intersection movements.

For example, at best the key Antill – Badham Streets intersection was at 98% capacity in 2018, already providing very poor ratings for comfort and convenience and the report concluded that even a small increase in traffic flow will cause 'operational problems'.

The size, function and use of Block 21's development will exacerbate these problems on all sides of the complex and the Development Application does not yet satisfactorily provide solutions or reassurance of any real improvement.

The reduced parking flexibility associated with the Block 21, Section 30 development, as well as the predicted increases in the inner north population, also suggest that many other issues have not been satisfactorily faced up to and addressed within the Development Application.

In relation to other matters the TIA report appears to be over-optimistic about the ability of the new environment around Block 21 Section 30 to ensure efficient and consistently 'excellent' opportunities as claimed for active travel, particularly public transport servicing. The problems arising seem to be pushed into future for others to address in the brand new environment.

Overall there appear to be many issues that need to be more closely addressed and acted upon in the immediate and long term for the sake of the surrounding residents, users of the

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<sup>1</sup> Traffic Impact Assessment Block 21, Section 30 Dickson Act: Development Application  
<http://203.9.249.10/e-registerfiles/pubnote/pdf/TRAFFICREPORT-201835109-01.pdf>

Group Centre, and visitors to the area, all of whom should be increasing considerably in number.

Block 21 is a central component of any renewal of the Dickson centre and should be an iconic and sympathetic addition to the high quality and well-designed large built forms, public spaces and landscaping that will make up the nearby Gateway corridor and conform to strict standards and other requirements.

This submission suggests that the planning for, and management of, Block 21's development should be improved in more functional and appealing ways, and be more sympathetic to the varying needs of Dickson centre users and the characteristics of the surrounding area.



28 February 2019

## I. Evidence of submission of Block 21, Section 30, Dickson plans to NCA/ACT Government Design Review Panel (DRP) and amendments arising.

1. There is no evidence attached to the Development Application (DA) that a Design Review Panel (DRP) assessment has been undertaken and the results addressed as part of the DA's completion.
2. A DRP assessment surely should have been (or be) undertaken, given:
  - the size, height (over four storeys) of the development, its key central location next to the Gateway corridor, and its being in the direct line of sight to and from that corridor which is to be developed to high design quality and landscaping standards as a nationally symbolic approach way
  - the large complex will be the first major commercial complex to be seen and probably visited by many travellers to Canberra, as well as thousands living in and around the inner north who visit the Dickson Group Centre
  - in the words of EPSDD the community needs to *get 'excellent value for (development) projects'*, and the DRP is *'part of a city-wide review process'* which EPSDD actively supports.
3. The Minister for City Renewal, at a public northside meeting on 20 February 2019, also reinforced the need for the DRP's focus and outcomes, in order to ensure high quality design standards and constructions not just for the narrow Gateway corridor, but also at some other major sites in Canberra: "Manuka" was mentioned – which presumably is the 6-storey hotel on S96, Canberra Avenue.
4. The Block 21, Section 30, Dickson Coles/residential complex is also on a prominent site in a busy residential and mixed use location, as well as being viewable from the nearby Gateway. The public requires reassurance and evidence that high quality architectural design, siting and landscaping standards will be met by this complex and also that it does not impact adversely on the public domain across 'central' Dickson.
5. DRP evidence is also required to restore faith<sup>2</sup>
  - if a DRP review has occurred, its results should be notified to all those providing input to this DA consultation, and the consultation period be extended
  - if a DRP review has not occurred, the reasons for this should be provided to the broader public as well as the current consultation participants. Advice about the actions leading to any non-involvement of the DRP, including when the decision was made, and by whom, should be provided in the public interest.

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<sup>2</sup> ***"We know that the community does not particularly trust us"***. Ms Karen Wilden (Director, Engagement and Executive Support, Environment, Planning and Sustainable Development Directorate), to the ACT Legislative Assembly *Standing Committee on Planning and Urban Renewal* inquiry into the 2017-18 Annual and Financial Reports, 9 November 2018.

6. The current ‘informal’ status of the DRP is irrelevant to any argument about not seeking informed assessment of the Coles complex plans: rather, the intent and spirit of the DRP process is relevant to this block’s history and current plans
  - while the Chief Planner stated in late December 2018 that the moves to formalise the Panel (under the Planning and Development Act) were ‘imminent’, it would seem that the DRP is still not a formal entity. But this is not an excuse for not using it in relation to the significant Block 21, Section 30 plans
    - in order to restore public faith in the process that accompanied the planning for Block 21, Section 30 over many years, and particularly the process surrounding the ACAT March 2018 rejection of the previous plans on many grounds, the ACT Government and Chief Planner should accept the spirit and intentions of the current DRP and seek a full panel assessment of the plans for Block 21, Section 30, if it has not been undertaken to date
    - **higher levels of oversight and review are required for this block in view of:**
      - **the ACAT’s findings that the earlier proposed development did not meet many planning criteria; and**
      - **well-founded expectations about the whole site needing to be of high quality, well designed, sympathetic to the character and functioning of the surrounding area.**

## II. Traffic Movements and Impacts

***“Appropriately managing the impact of any development on car parking in the Dickson Group Centre will be a priority.”<sup>3</sup>***

### A. Traffic impacts around Block 21, Section 30

1. The Traffic Impact Assessment (TIA) report for Block 21, Section 30 expects a low volume of traffic in the shared zone, but acknowledges that there will be vehicle queuing along there at times (p. 24). This means that the environment there for foot and bicycle traffic is degraded. It also takes an over-optimistic view of traffic in the shared zone, given that Ubers/taxis and private vehicles are likely to need to use this area to pick up and set down shoppers, particularly the elderly and people with disabilities, so it will not be car-free, despite what is suggested in the artist’s impressions.
2. The report also indicates worsening **lines of traffic banking up along both sides of Antill and Badham Streets** (both sides) given that these key streets are to be used to enter and leave the complex’s surrounds

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<sup>3</sup> Communication Unit, Economic Development Directorate, ACT Government, Survey *questionnaire*, “Dickson Centre Master Plan: Supermarket Options”, November 2011.

- currently traffic and people move and circulate easily across the whole site's area of parking, given that there are two lanes on the southern and eastern sides and **eight** entrances and exits to these roadways
  - vehicles seeking underground car parking will still need to slow down considerably to allow for the number-plate recognition to occur and consequently will contribute to queues along the streets around the complex.
3. The TIA does not indicate whether estimates have been made of the **build-up of vehicle emissions and airborne particles** along Badham Street and from the exit on to Antill Street, and also along the shared zone, as this will be quite narrow and enclosed compared to the current environment.
  4. These traffic impacts also have repercussions for public transport servicing routes on two sides of the development (see B below).

#### **B. Traffic impacts on public transport services**

1. It is not readily clear from the DA's street-by-street analyses if impending and future public transport servicing arrangements and requirements have been addressed thoroughly.
2. Disruptions to the new and increased public transport services that will operate around this large development site will need to be anticipated, addressed and avoided on a day-to-day basis in view of the many passenger connections that need to be made, stress-free, between bus and rail at the new nearby Dickson Interchange from April 2019.
3. These considerations apply to both
  - (a) ***the long construction phase***, with heavy equipment, machinery, materials and workforce moving to and from the site daily
    - at all times, bus services heading to Dickson Interchange and rail stop need to be given quick, priority access along Antill and Badham Streets
    - banking up of buses in any queues along Antill Street must be avoided so that passengers can make further timely and predictable connections within the public transport network as timetabled
  - (b) ***the post-construction phase*** will see an expected banking up of slow-moving vehicles along and across Antill Street and down Badham Street for entry to and exit from the complex (particularly at key times such as morning and early evening), with consequent problems for bus service schedule-keeping (the TIA analyses support this likelihood).

- the increased number of bus routes using these streets should be given bus lanes and high turning priority in view of the current number of traffic lights and crossings in the lead-up to Badham Street from the east and west.
4. In view of 1 - 3 above, both Antill and Badham Streets need redesigning to give priority to active travellers (foot, bike and bus traffic) and the 'putting people first' principles espoused in key December 2018 planning documents
    - this is a matter that the government and the developers of Block 21, Section 30 have to address, and **inform the broader public about before any construction starts.**
  5. Further, a clear commitment is required to ongoing close monitoring and problem solving on these matters as the site is developed, and when fully functioning.
  6. Bus timetabling should not have to have increased travel times factored in because of congestion caused by Block 21 construction and operations. Some post-April re-badged services, for example, to Civic, are already to be much longer than currently experienced
    - in short, active travellers should not be further disadvantaged by the construction and subsequent permanent operation of the site.
  7. While the DA's TIA report notes that '*public transport via the nearby bus interchange and light rail station is excellent*' (p. 49), this conclusion can only be realised if the impending increased number of bus routes on Antill and Badham Streets are given priority at all times
    - during the construction and post-construction phase; and
    - and over the movement of large, slow moving, over-length vehicles involved in goods delivery and waste pick-up activities right next to Antill Street.
  8. The reassurances and actions required in 1-3 above are also consistent with and complementary to, the ACT Government's commitment to managing car-parking impacts across the Dickson Group Centre during and after the site's redevelopment (see III below).

### **C. Leaving the built complex will be dangerous for drivers, cyclists and pedestrians**

1. The vehicle exit area from the complex is a maze of interlocking roadways and crossings
  - but there is only one road leading directly out
  - the junction of this road (on the eastern side of the complex) with the road along the northern boundary of the Dickson Library is assessed as a '*critical intersection due to a number of potential conflict points to be managed*' (TIA, p.24).
2. Once on that only exit road, drivers have two options:
  - go straight ahead to the dual left hand turn only lanes onto Antill Street

- turn right into the road alongside the north of the library, which leads to Cowper Street.
3. Drivers wishing to go east to Downer or Watson or Hackett or south to Ainslie will take the second option and turn right. They will not go out on to Antill Street because they will then have to circle back through the centre of Dickson to Cowper Street, or attempt a U-turn on Antill Street.
  4. The street along the northern side of the library, currently at 60% capacity, will become more highly trafficked, further disrupting the mostly pedestrian access to the range of established medical centres along the northern boundary of the road and also the parking area east of the library.
  5. **This planned arrangement is dangerous**
    - drivers emerging from the underground carpark and wanting to turn left will have to merge with traffic coming in from their right from the shared zone and at the same time be alert for traffic inbound from their right
    - drivers coming along the shared zone have first to merge with the traffic popping up from the underground car park and initially invisible which, as the TIA says, *“will require careful design resolution during the detailed design stage to optimise sight distance for vehicles in the shared zone to observe vehicles exiting the basement ramp”* (p. 24). The drivers will then have to be alert for traffic coming in from their right
    - then, immediately upon entering the road to Cowper Street, drivers have to be alert again for pedestrians using the crossing there – an issue apparently not addressed in the report.
  6. **These complexities create a strong potential for misjudgements, accidents, and long tailbacks into the underground carpark and the shared zone.**
  7. The TIA identifies some of the issues, but not the risk to people on the pedestrian crossing. Nor does it apparently offer any solutions.
  8. These complexities, and the seeming inability to improve the situations described, may cause many shoppers and Dickson service users to support other shopping/service centres.

### III. Parking impacts and remediation

1. In 2011 the ACT Government formally advised all consultation participants on Block 21, Section 30 options that ***“appropriately managing the impact of any development on car parking in the Dickson Group Centre will be a priority.”***<sup>4</sup>
2. Construction phase parking impacts and management need clear assessment, remediation, and communication to the broader public in relation to
  - all off-site parking by site workers during the day and night
  - easy community access to existing businesses and public services.
3. Construction workers should not use
  - any of the limited remaining car parking spaces along Antill Street, to the south of Woolworths, or in the remaining car park east of the library (Block 19) because this would greatly reduce short-term parking for the growing number of users of Dickson Centre (the inner north population is steadily increasing) – for example along Antill Street
  - any verges on or under tree spaces along Antill or Cowper Streets, because use of such spaces would
    - further compromise the health of existing trees on Antill and Cowper Street
    - be a long-term visual eyesore, given the very large number of trucks and utes associated with other sites, such as the large tradies parking area on the western side of ANU
    - pose safety issues as many vehicles would be arriving and leaving around peak traffic periods, including school times
    - add to the already acknowledged high level of traffic saturation along Antill and Badham Streets (Northrop report TIA Intersection Analysis descriptions and results, eg pp 20-24 refer) and recognition that this saturation will *‘significantly increases with the introduction of the development’* (p. 22)
    - be an unwarranted brake on the start of the well overdue landscaping and major perimeter regeneration on Section 72.
4. Since construction parking (or any other temporary parking) has also been ruled out for any part of Block 13, Section 72,<sup>5</sup> the site plans need to clarify the location of any new parking, whether in Section 72 or elsewhere
  - and the public be clearly informed before construction begins.
5. The DA does not appear to indicate that the current level of **free parking** will be available for the weekday and weekend periods that have applied for many years

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<sup>4</sup> Communication Unit, Economic Development Directorate, ACT Government, Survey *questionnaire*, “Dickson Centre Master Plan: Supermarket Options”, November 2011.

<sup>5</sup> Written Ministerial advice of 20/6/16 to submission makers on potential Block 13, Section 72 issues and EPSDD confirmation that Block 13 would not be used for car parking (Canberra Times, 29/6/16).

- currently 64 (27%) of the car parking places in the open car park space opposite Woolworths (Block 21, Section 30) are free of charge for 24 hours a day
  - in addition, all the current 236 car spaces available there are free for extended periods
    - from late afternoons until early the following morning Monday-Thursday
    - from the evening of Friday to early Saturday morning
    - from noon Saturday through until early Monday morning
  - this level of free parking availability needs to be confirmed as being **continued in the longer term within Block 21. It is a matter of equity**, as there is access to free parking in other main shopping centres.
6. Long-term permanent parking, ie the post-construction phase, should retain the current level of free all-day parking available in the complex's vicinity (including Section 72) for equity and visitation encouragement reasons, although those free spaces between Block 21, Section 30 and Cowper Street may need to be more time limited in future (eg 2 hours?).
7. It also needs to be recognised that many users of the Dickson Group Centre will not wish to negotiate a massive underground carpark and will find surface parking opportunities more efficient, particularly when traffic queueing is evident along Antill and Badham Streets. At the moment, even at busy times, parking is fairly efficient and the roadways negotiable. This may prove not to be the case for a very large underground car park wedged by already busy and almost over-capacity streets.
8. Conclusion: in view of the poor current and future outlooks detailed in the TIA's Intersection Analysis data, and the likely increasing parking pressures – especially given the growing inner north population - and the fact that some adjacent bus services will not be having their frequencies increased during the day for Monday through Friday, making car use potentially more attractive
- **further analysis and remedial action is required in relation to public and private traffic management, and meeting above-ground parking needs, as well as provision of free parking periods underground and above ground.**

#### **IV. Climate control, thermal comfort and landscaping elements: more evidence needed.**

1. The whole site requires more attention to the provision of
  - more trees and vegetation and other clearly defined steps to manage the heat island effects from the many new surfaces in such a new built-up area
  - more visual appeal and comfort for active travellers in and around the Block.
2. **The 2018 Planning Strategy** (pp 68-69) requires a range of mechanisms to help mitigate heat build-up from such a major structure. The Block 21, Section 30 plans

do not appear to address the complex's contribution to heat creation and mitigation in the Dickson central area. Yet this should be incorporated, given the use of the site's space principally for built forms.

3. In addition, the **2018 City and Gateway Urban Design Framework** makes clear the value of good landscape design to
  - *“soften... the impact of larger buildings and provide visual relief to the urban condition”* (p. 37); and
  - *“improve our living infrastructure to increase the city's resilience to climate change... to provide thermal comfort... and help promote active travel”* (p. 18)
  - the Framework also refers to the development within the existing Dickson Group Centre (p. 17) of which Block 21, Section 30 is a significant part and *“the need to foster the renewal of public spaces and vibrant street level activity centres”* there.
4. In relation to the intentions and objectives at 2 and 3 above, the 'living infrastructure' plans shown for Block 21, Section 30 is an inadequate response to improve the comfort of the increased number of people who are expected to enter and exit this area on foot, or by bike or bus (ACT Government active travel strategy official's advice 2018 refers)
  - a far more lush and softening approach, such as parallel rows of large shade-giving trees over all pathways, particularly in Antill and Badham Streets and on the north-south oriented part of the shared zone and the roadway to Antill Street, is required.
5. Block 21, Section 30 has direct servicing and route relationships to the Gateway's "Dickson Node" and also to the increase in pedestrian traffic that will occur between the two locations. Similarly with the traffic between the supermarket area and the bus stops on Antill and Cowper Streets and the to-be-developed Section 72 adjacent to Cowper Street
  - more deep shade producing trees are needed, not just along the Badham Street frontage of the block to counteract harsh summer sun there, but also around the rest of the site to improve pedestrian comfort and visual appeal
  - the same applies to good shade cover needed for efficient pathways to Antill and Cowper Streets bus stops and to the Dickson Interchange/Dickson light rail stop (see V below)
  - in addition, the potted plants shown in the plans should be provided as an accessory, for visual appeal only (assuming that they are watered and maintained), but not relied upon for heat island mitigation impacts around the complex. More trees and other responses are required in that area.
6. Given the extremes of temperature and associated weather conditions experienced in Canberra, pedestrians and other active travellers also should not be subjected to

cold, overshadowed wind tunnels, which is what the shared zone will be like for many months of the year

- the southern side of the complex is currently very sunny and warm throughout the winter. But on the plans it is a more narrow 'shared zone' with a tall wall of building mass in front of it
    - how will this 'share zone' be made more comfortable in winter and visually attractive all year round?
  - this narrow southern area, as well as the eventual pathways on other sides of the complex, will not create an appealing environment to negotiate, to use, to pass through, or to meet up with others for quite a number of months of the year
  - the 'plaza' or 'square' at the entrance to the Block 21 supermarket is basically a large area to assist movement of large numbers of people, trolleys, etc in and out of the building and will also be subject to much overshadowing and chilliness during winter days.
7. There is no evidence of shaded and efficiently linked pathways for pedestrians and cyclists leaving the complex, let alone consistency in climate control and landscaping approaches for these pathways which need to service areas of significant people movement between Antill and Cowper Streets and between Northborne Avenue and the Dickson Interchange:
- yet Block 21, Section 30 is a central, integral and contributing part of this much needed efficient pathway network (see also V below).
8. **The plans need to illustrate how the required responses on these landscaping, climate control and related infrastructure matters (as per the Planning Strategy and Gateway Framework) will be developed from the time of construction**
- this will help ensure that the environment surrounding the complex is more appealing all year round and better meets the needs of the increasing number of active travellers.

## **V. Other support elements – pathways, trolleys, retail options, site fencing and containment.**

To improve the public amenity and visual and practical attractiveness of Block 21 and its immediate surrounds, the following factors should be addressed:

### 1. Integrated pathways

- Block 21 cannot be considered as a viable and publicly acceptable development unless evidence is provided of planned integrated provision of safe and direct shaded pathways to encourage and assist movement of foot and bike traffic to and from Block 21, Woolworths and surrounding businesses

- the DA's claimed provision of more 'amenity' for bicycle users and pedestrians via wider surrounding paths and 'access' (TIA report p. 49) is useless unless these improvements are part of and link-up to far better and efficient people movement pathways across the whole area. They need to also give active travellers some priority in and across the area particularly Cowper Street bus stops, the Dickson Interchange, and the new rail stop, as well as priority over vehicle traffic and congestion impacts.
- Far better physical connectedness is needed to and from the area that will house both supermarkets.

## 2. Trolleys and trolley bays

- Wider and shaded pathways in 1 above must also be able to safely accommodate trolleys, given that the ACT Government's 'active travel' philosophy expects more shoppers at Dickson to arrive and leave by bus and rail in future, and go shopping more frequently, rather than a large car-supported expedition, say once a week<sup>6</sup>
  - many living in the large apartment complexes on Northborne Avenue near to the Interchange will also need to use trolleys on their return journeys after shopping.
- Well camouflaged and attractive trolley bays and coin retrieval machines need to be provided at the Interchange and also further north along Challis and Cape Streets, as well as Cowper Street and frequently cleared by the two supermarkets, given the many hundreds of shoppers who will soon be living in the vicinity and also passing through.

## 3. Block 21 retail options

- In the public interest, far more quality shopping options are required in the Dickson Group Centre to attract and retain shoppers and other visitors and encourage them to linger
  - to achieve this the ground floor spaces in Block 21 may need to be actively planned for rather than be left to chance – Dickson cannot support a fourth nail salon in that area
- or, particularly given Coles' recent financial performance, will the Coles' developer resist quality competition?
  - nevertheless, those 'retail' spaces should be designed initially to support a range of possible new functions such as a specialist or artisanal bakery.

## 4. Site fencing and containment

- Also in the public interest, good quality visual barriers are required around Block 21 for the construction period to help ensure
  - dust and noise do not carry across the surrounding area and into Downer

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<sup>6</sup> 'Active travel' official's advice during public consultation 'Walkshop' on Section 72, 1/5/18

- a far more visually pleasing impact is achieved than the rail corridor's inadequate quick-to-turn-to-tatters cloth screening.
- High, good quality metal screening should be used, such as surrounds the Constitution Place development in Civic.
- The accessibility and useability of the immediate Dickson Central area needs to be maintained and supported as much as possible, and Block 21's redevelopment must support this in more obvious 'environmental' ways.
- The liveability of Downer's residential areas also requires such consideration, and those passing through the area, eg from the adjacent nationally symbolic Gateway, also deserve an improved visual environment over what will be a long period of intensive building and construction work.

## **VI. Evidence required of development "lessons learned" by all.**

1. Much media coverage in recent weeks has highlighted ACT Government spokespeople using reassurances that the government:
  - has learned many lessons from the negative impacts experienced across the central Gungahlin shopping area, both on businesses and the public, during the long light rail construction phase; and
  - is now committed to applying these lessons elsewhere.
  
2. Can Coles, the developers and builders, and the ACT Government identify these lessons and advise of their plans for them being applied across the whole central Dickson precinct and Section 72, throughout the long construction phase there, especially in relation to:
  - encouraging and maintaining ease of movement for shoppers, other users, pedestrians and cyclists in and around the central area
  - promoting ease of movement of people across the whole area to maintain quick and easy access to key bus stops on Antill and Cowper Streets, the new Dickson Interchange and the light rail stop
  - maintaining ease of access to existing businesses of passing trade (see also II - V above)
  - minimising on-site noise levels affecting the surrounding area and Downer residents opposite (V also refers)
  - minimising the impacts in the immediate area on people and normal traffic of the large freight vehicles arriving and departing, as well as on Antill and Badham Streets (see also II and V above)
  - minimising the 'uglification' of the whole area for a long period of time (see also V above)
  - other critical factors identified by the ACT Government planning and development experiences?

3. All these factors **impinge greatly on the physical and visual amenity** of thousands of residents near and around Dickson and therefore demand a high degree of on-going and well-monitored attention and resolution, given the development's high degree of centrality and the existing adjacent public and commercial business services around Block 21.

## **VII. Conclusion: impressions**

- Overall the building's form and components do not come across as meeting the high standard of design, innovation, quality and landscaping that should be expected for the infill of such a large and prominent site
  - it still leaves the impression that its overriding priority is to fill up as much of the site as possible.
- Its mass, height and siting are still far too pronounced for the location and out of character with the surrounding environment.
- There is still far too little 'people space' connectivity and vegetation space incorporated in the current plans.
- Many of the forward-looking principles and objectives in relevant and key ACT Government planning documents released in December 2018 do not appear to have been addressed or picked up on in the plans
  - to say that they were not finalised or formalised when the Block 21, Section 30 plans were being reworked last year is not a sufficient reason for not showing evidence of their application in these re-worked plans
    - : the broad intents and contents of these documents remained unchanged from draft to final stage
    - : given the past history of planning for the Block 21, Section 30 site, and the planned complex's role and longevity on the site, a clear picking-up of the spirit and long term objectives of these documents would demonstrate a high-level recognition of the sort of sympathetic, yet creative contribution such an infill project could make on this site and to the Dickson central area.

Customer Service  
Dame Pattie Menzies House  
16 Challis Street  
DICKSON ACT



RE: Development BLOCK 21 SECTION 30 DICKSON

I am writing to you to submit my objection to this development of Dickson Block 21 Section 30, as the ACT Government has put a great emphasis on the Walter Griffin plan in relation to the tram, I can't see how this development fits in with the Griffin plan

"Walter Burley Griffin and Marion Mahony Griffin design envisaged - of parks and boulevards, public buildings and monuments - its leafy garden suburbs and landscape setting."

Can you explain how the removal of around 40 trees encompasses the Burly Griffin Plan and how does the new development capture the Griffin plan. Also, can you also inform me what impact will this development have on the Environment now and the future and if any modelling has been done on the impact of heat generated by this development? Will this cause another environmental hotspot in Canberra due Canberra's large increase in high rise buildings, the renewal programme and the disgusting development of Canberra with and removal of gardens and trees throughout established suburbs and replaced with Units being built throughout the Canberra area?

On a personal note as a Canberran who was born in Canberra and helped develop Canberra is makes me angry and sad to see this beautiful city being destroyed by lack of planning the for the purpose of generating revenue. May history condemn those who approve such developments

Surely this must be a better way to develop this city and to continue the Vision that Walter Burley Griffin and Marion Mahony Griffin had, and a good start would be to redesign the Dickson development.

Yours sincerely



28 February 2018

28 FEB 2019

CAN YOU INFORM ME WHAT PUBLIC MEETING HAVE BEEN RE THIS DEVELOPMENT!