

Ms Sally Barnes
Chief Executive
National Capital Authority
WAconsultation@nca.gov.au

Dear Ms Barnes,

Works Approval applications for City Block 16 Section 10 (WA102651 and WA102762)

Thank you for the opportunity to comment on the two Works Approval applications for City Block 16 Section 10, comprising site preparation and the construction of three buildings up to 9 storeys, basement parking and landscaping, including a pedestrian plaza from London Circuit to Allara Street.

The City Renewal Authority (the Authority) considers this development to have the potential to contribute to the desired character and vitality of this part of Canberra City, subject to a range of key issues being addressed, including:

- Building 2 ground floor design which would result in a weak connection to London Circuit and amenity issues for future level 1 residents;
- Ensuring the plans accurately conform to future London Circuit verge conditions;
- Sustainability measures are deficient in several areas including canopy cover, permeable surfaces, deep soil zones and bike storage;
- The viability of the landscape on basement podium;
- Poor dwelling mix and inadequate solar access into residential units;
- Overshadowing of the neighbouring Forum apartments; and
- Tree removal.

Further information on these and other issues is provided below.

Interface with London Circuit

A key issue is the interface of Building 2's ground floor (GF) with London Circuit. The floor would be sunken – almost 3m below footpath level – and with a slab-to-slab height of only 3.8m, passers-by will look directly into adjacent level one apartments. This would affect privacy for residents and result in headlight glare. The Authority recommends the GF floor-to-ceiling height be



substantially increased to enable the ground level to have a stronger and more generous street presence, support residential amenity and allow long-term adaptability.

As you are aware, the raising of London Circuit under Light Rail Stage 2 will begin soon, and this development needs to be designed accordingly. Several plans provided (for example, elevations WA-2003 and WA-2005) suggest the future verge conditions are reflected. The Authority recommends the proponent maintain close engagement with Major Projects Canberra to ensure future verge conditions are accurately reflected in the plans for this development and they are updated in response to any revisions that may occur.

Sustainability

The scheme is deficient in several key areas crucial to the sustainability and liveability of the city. Canopy and permeable surfaces coverage is only 15.4 per cent and 20.8 per cent respectively, well below the Territory's target of 30 per cent. Medium-to-large canopy trees have been almost entirely eliminated from the scheme. Deep soil zones are confined to the remnant edges of the site, affecting drainage and ground water recharge. This development needs to improve its performance in line with the Territory's and the community's expectations for sustainable development. This includes achieving canopy and permeable surface coverage of at least 30 per cent and revising the basement design to allow for larger areas of deep soil in conjunction with planting of large trees. Given the site is in walking distance to employment and public transport, a reduction in car parking from the proposed 409 spaces should be considered.

While the provision of a bike hub is supported, 90 spaces is significantly inadequate to cater for 356 units. Residents who do not secure a space within the bike hub should not be expected to store their bikes in storage cages. These spaces are not sufficiently sized to accommodate bikes alongside general household storage. The Authority recommends the number of secure bike storage spaces be increased to allow for at least one space per unit.

Landscape viability and management

The proposed landscape rests almost entirely on a basement podium. Detailed sections should be provided to demonstrate that soil depths will be sufficient to allow tree roots to develop properly so the trees are stable and healthy.

The plans also show landscaping that extends past the site boundary onto the London Circuit verge. The proponent will need to confirm their intention to



cover landscaping construction costs and agree on ongoing management arrangements with Transport Canberra and City Services as soon as possible.

Dwelling mix and solar access

Only 51 per cent of units would receive more than 3 hours of sunlight between 9am and 3pm on the winter solstice. This is well below the 70 per cent expected. The Authority strongly recommends this be addressed to ensure amenity for future residents and demonstrate a commitment to achieving high standards of urban living in this important designated area.

The current scheme lacks dwelling diversity, with 1 and 2 bedroom units appearing to comprise the vast majority of the development, and only three 3 bedroom units identified out of 356 units. The number of apartments with 3 or more bedrooms should be increased, to support social diversity and make city living a more viable option for families. The Authority recommends aiming for a minimum of 20 per cent, in line with our *Sustainably Strategy 2021-2025*.

Overshadowing of neighbouring Forum apartments

The shadow diagrams show the neighbouring Forum apartments will experience significant overshadowing between midday and 3pm in winter. The Authority considers it reasonable to require the upper two levels of building 3's eastern side be set back, in an effort to mitigate this and support equity for both existing and future residents in this section of the city.

Accessibility from London Circuit to Allara Street

The provision of a clear and inviting pedestrian connection from London Circuit to Allara Street is strongly supported. The Authority understands addressing the level changes between the two streets is challenging and the current scheme proposes to do this predominantly through stairs and terracing. Further information on the accessible path (which may include the use of lifts) should be provided to demonstrate that people with mobility issues or pushing prams are not excluded. The accessible route needs to be clearly signposted, legible, equitable and convenient.

Tree removal

There is a clear lack of consideration for the retention of trees on site. 28 trees have been identified for removal including several on public land. The Authority considers the retention and protection of trees of good health and structure, where possible, as essential. This would include revising the boundary of the



basement structure. Advice should be directly sought from the ACT Conservator of Flora and Fauna.

Thank you for considering our comments as part of your evaluation. If you wish to discuss, please get in touch with myself or Lucy Wilson, Executive Branch manager, Design and Place, on Lucy.Wilson@act.gov.au or (02) 6205 2995.

Yours Sincerely

A handwritten signature in black ink, appearing to be 'Malcolm Snow', written over a horizontal line.

Malcolm Snow
Chief Executive Officer
City Renewal Authority

20 June 2022

