Sent: Wednesday, 21 December 2022 10:42 PM

**To:** Works Approval Consultation

**Subject:** Block 2 Section 4 Parkes – Anzac Park East Redevelopment

Submitted on Wed, 2022-12-21 22:42

Submitted by: Anonymous

Submitted values are:

Are you an individual or an organisation?

Organisation

## **Organisation Name**

**Campbell Community Association** 

#### First name

Cherill

#### Last name

**Hopkins** 

### **Email**

monsieurhulotholiday@gmail.com

## **Postcode**

2612

## What Works Approval application are you making a submission for?

- WA102975 Construction of a new commercial office building, WA102646 Construction of a mixed-use residential development
- WA102975 Construction of a new commercial office building

Chief Planner National Capital Authority Treasury Building Parkes ACT 2600

Dear Chief Planner

Works Approval Anzac Park East Development: Comments re WA 102975 – Construction of a new commercial office building and WA 102646 – Construction of a mixed-use residential development

This submission provides comments from the Campbell Community Association (CCA) in relation to both the above works approvals.

The CCA is a voluntary, not for profit, community-based association operating in the ACT suburb of Campbell. The CCA has been involved in providing community views in response to many development applications and works approvals over the past five or more years. Our comments reflect the experience we have had with these many new developments in the suburb.

Due largely to the intense urban development along Constitution Avenue since 2016, the population of Campbell has increased by 42% since 2016 from 3220 to 4,588 (ABS, 2021 Census). CCA membership has also increased, and Campbell residents also account for much of the boost in membership of the North Canberra Community Council in 2021-22. When we set out, we were prepared to work with developers to achieve high quality, liveable outcomes for the community. However, as developments have been completed and our suburb has changed, there is a growing concern about development impacting adversely on the suburb and residents. There is also a growing sense that despite residents contributing to development consultations such as the War Memorial redevelopment, their views are ignored, consultation is futile, and residents are on a losing side of a "fustian bargain".

Soon, the number of apartments in Campbell is set to overtake the number of single dwelling houses in the suburb. The impact assessments provided for these works approvals do not factor in the proposed further urban intensification foreshadowed in the ACT Government's district plans. If this strategy eventuates there will be increased pressure on green space for recreation and dog walking, parking, traffic, and services, over and above that estimated in the works approval assessments.

Against this background, the CCA highlights the following principal concerns with the proposed Anzac Park East works approvals.

## Building heights

We note the building heights for the portal and neighbouring buildings in Figure 81 of the Constitution Avenue and Anzac Parade Precinct Code in the National Capital Plan (NCP) (25 metres for residential buildings, RL600 for the portal building). If, however, the developer/builder proposes to increase the heights of the building above these levels, this must be made public and there must be a public consultation process. This was the process for 71 Constitution Avenue. The CCA position is that there should be no increase in building heights above those in the current precinct plan and the NCP.

## Access to the Lake via Wendouree Drive

From time to time in the past five years, construction of new developments has closed pedestrian access for Campbell residents to Commonwealth Park and the lake foreshore via Wendouree Drive and the Reid underpass. We ask that throughout the construction of Anzac Park East, that Campbell residents have continuous safe access to the Lake and Kings and Commonwealth Parks via Wendouree Drive. Some of our disabled residents use the new Wendouree carpark to access the Lake and this access is appreciated and needs to be continued.

## Geotechnical survey and construction noise

The works approval documents do not appear to include a geotechnical survey or an assessment of the impacts of excavation and construction noise and vibration on surrounding buildings and their residents. This is a requirement in built-up areas in most other capital cities.

The geology of Campbell is complex, and some developments have struck unexpected issues. The result is that the additional costs of excavation have had to be covered by cutting costs on building finishes, reducing double-glazing and landscaping. The result is that buildings are not built to plans lodged with the NCA or ACT Government.

## Quality design and quality finishes

The CCA agree that the Anzac Park East buildings and in particular the portal building need to be high quality, high specification and have high quality finishes that are environmentally efficient and sympathetic to the location's character and heritage values. The brutalist concrete finishes on many new developments in Campbell has been a concern to residents. Visually, the look is not great, and we think, not appropriate for Anzac Park East. The plans we saw in consultations on these other buildings did not indicate that raw concrete would be the final, external finish. Apartment buyers were also caught off-guard to find their building was not the lovely colour in the brochure. With time, the concrete has darkened, and some buildings have stains. Owners' corporations in some buildings are now increasing or raising special levies to undertake trials on sections of their buildings to see if they can be cleaned or if owners will need eventually to pay for a new architectural finish. It's like a kind of cost-shifting from developers to owners though we hope that is not the case.

We welcome the proposed solar panels on the portal building roof, the proposed use of solar energy and that gas will not be used for hot water in the buildings.

The lighting and landscape designs in the works approval documents appear to be intent or concept only. We look forward to seeing this high-quality design and build objective achieved. The proposed landscape lighting across the complex looks understated and has the potential to make the site distinctive, and hopefully, beautiful.

#### Trees

Various plans in the works approval documents set out tree protection and tree removal plans. No plan is the same as the other. A walk around the site this week (Dec 2022) shows that many of the trees on the plan marked for retention have already been removed. We have also seen in recent days that orange ribbons have been tied around the established trees on the public land between the Anzac Park East south boundary and Parkes Way. Is it necessary to remove the tall established trees that appear in healthy condition since the rain?

This is another example of the extensive removal of established trees in Campbell and surrounding areas over the past five years. New apartment developments are sold on the basis that buyers will be enjoying tree lined, leafy Campbell but increasingly this is not the character that people are finding in Campbell – we are not one of Canberra's leafiest suburbs anymore and indeed we experienced heat islands in the most recent drought. This concerns residents deeply and they want to see these practices reversed.

The CCA strongly advocates for natural 30% of ground site vegetation cover and, if possible, canopy cover in new developments consistent with the ACT Government's urban forest policy. We would strongly support an increase in green landscape for this redevelopment, including planting of local, original species such as wattles and grasses that grew here before Messrs Campbell and Ainslie overgrazed the area.

WA 102646 shows the plan for the carpark access and egress onto Wendouree Drive. There is a clump of three trees proposed to the left of the basement exit onto Wendouree Drive. This should be looked at again for traffic safety. Perhaps the trees could be relocated elsewhere on the verge where they don't cause a driver visibility issue. There needs to be trees and plantings on the verge as the proximity of the building along Wendouree Drive is going to create a very solid, hard surface look compared to the open space that was previously there.

## Traffic and parking

We note the traffic assessment. The NCA may be aware that the ACT Government has proposed a whole of suburb traffic and parking study for Campbell in 2023. This follows a community petition to the Legislative Assembly, given a scarcity of parking facilities around the shops, primary school, and new developments. With permanent on the road parking and a lack of fines for those who contravene parking signs, and many defence personnel who park in residential areas, the suburb is becoming dangerous for pedestrians and bicyclists.

# Noise

The NCP objective for the Constitution Avenue Precinct is a 24-hour community. Feedback from new and long-term residents is that Campbell is a noisy suburb due to constant major construction projects over the past decade, increased road traffic and increased light aircraft traffic since pandemic restrictions lifted. Residents in various parts of Campbell are reporting difficulties sleeping due to traffic noise at night, particularly along Parkes Way and to a lesser extent, Fairbairn Avenue (most of the suburb is located between these main roads). Double-glazing is becoming a necessity across the suburb, and outside amenity in yards and balconies is being compromised. Trees and vegetation once helped to muffle traffic noise and its extensive removal at major development sites (such as the War Memorial, C5 etc) and on individual blocks is contributing to the higher noise levels being experienced by residents.

We thank the NCA for the opportunity to comment. We look forward to seeing a response to our concerns.

Yours sincerely

Cherill Hopkins CCA Chair

21 December 2022

## - WA102646 - Construction of a mixed-use residential development

Chief Planner National Capital Authority Treasury Building Parkes ACT 2600

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Yours sincerely

Cherill Hopkins CCA Chair

21 December 2022

I have read and understood the submission terms and conditions above. Yes

No, I do not consent to the publication of my submission.  $\ensuremath{\mathsf{No}}$ 

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