

Works Approval Application

Attention:	Ilse Wurst National Capital Authority Treasury Building King Edwards Terrace Parkes ACT 2600 Ilse.wurst@nca.gov.au
From:	Annalisa Dietrich
CC:	Margot Andrew (Infrastructure Canberra)
WA subject:	Light Rail Stage 2A Public Art – “The City She Drew”
CMC Works Approval Ref:	DWA 5
Lodgement Date:	13/03/2026
Name of Applicant:	Canberra Metro Construction
Site location:	Commonwealth Avenue median, north of the intersection of London Circuit and Commonwealth Avenue
CMC Doc #	LRS2A-CM CON-ENV-WKA-0030

1. Project Background

The LRS2A Project comprises 1.7km of light rail from the existing terminus at Alinga Street to a new stop at Commonwealth Park and includes the construction of two intermediate stops at Edinburgh Avenue and City South. LRS2A will integrate seamlessly with Light Rail Stage 1 (LRS1) with light rail vehicles travelling the full length of the combined LRS1–LRS2A line. Operations and maintenance will be managed by the same entity for the full LRS1–LRS2A line.

There are multiple approvals that form part of the broader scope of works Canberra Metro Construction will deliver as the LRS2A project. Including;

1. DA202341467 & WA103077 for LRS2A
2. DA202341861 for Traction Power Substation (TPS) 6
3. WA103410 for the Commonwealth Avenue Utility Relocation.

The construction phase comprises three main components:

1. **Early works:** involving survey, dilapidation reporting, potholing, geotechnical, contamination and to inform the subsequent two stages.
2. **Enabling works:** involving utilities relocation and permanent protection works, and the initial establishment of site compounds. There are two stages to the utilities relocation and permanent protection works
3. **Main works:** involving the various construction works required to deliver Stage 2A of the Canberra light rail.

The NCA have responsibility for determining detailed conditions of planning, design and development for proposals in Designated Areas. Approval for the design of the LRS2A project was granted by the NCA in July 2023 under WA103077, referred to as DWA1, with ancillary approvals as described above for utilities relocation and TPS 6. This provides the reference design footprint. Further design works approval will be forthcoming for additional detail as required.

For efficiency, Works Approvals associated with the Light Rail Stage 2A Project will typically be separated into design (DWAs), construction (CWAs) and traffic (TWAs) Works Approvals. DWAs will seek approval for permanent elements of the Project. CWAs will seek approval for temporary works including survey works, construction site establishment, construction methods, and construction environmental management. TWAs will seek approval for traffic management.

The separation of WAs in this way allows CWAs to cover larger scopes of works appropriate to the nature and location of temporary works. Construction of a given element will not commence until there is both a design and construction WA in place which addresses that element.

2. Summary of works

This planning report forms part of a Design Works Approval (DWA) application for the installation of public art north of the intersection of London Circuit and Commonwealth Avenue. The artwork is titled “The City She Drew”, a sculpture honouring Marion Mahony Griffin. The works would include:

- Construction of a plinth and installation of a 4.5m high sculpture
- Under boring of conduits across Commonwealth Avenue for lighting
- Installation of up to 4 luminaires within casings to up-light the artwork
- Minor extension of the existing garden bed to accommodate the works and reinstatement of soft landscaping.
- Small plaque with name of artwork and artist details.

This planning report provides an assessment of the proposed works against the relevant provisions of the *ACT Planning and Land Management Act 1989* (PALM Act) and National Capital Plan (NCP).

The proposed works address all relevant statutory planning controls and considerations, and therefore it is concluded that the proposed works are not inconsistent with the provisions of the PALM

Act and NCP. Accordingly, the proposal warrants the support of the NCA through a positive determination of the WA application.

3. Site Description

The works are to be located on a Designated Area in the City Hill Precinct. The artwork is proposed to be located in the median of Commonwealth Avenue, to the north of the intersection with London Circuit (Refer to Figure 1 and 2).

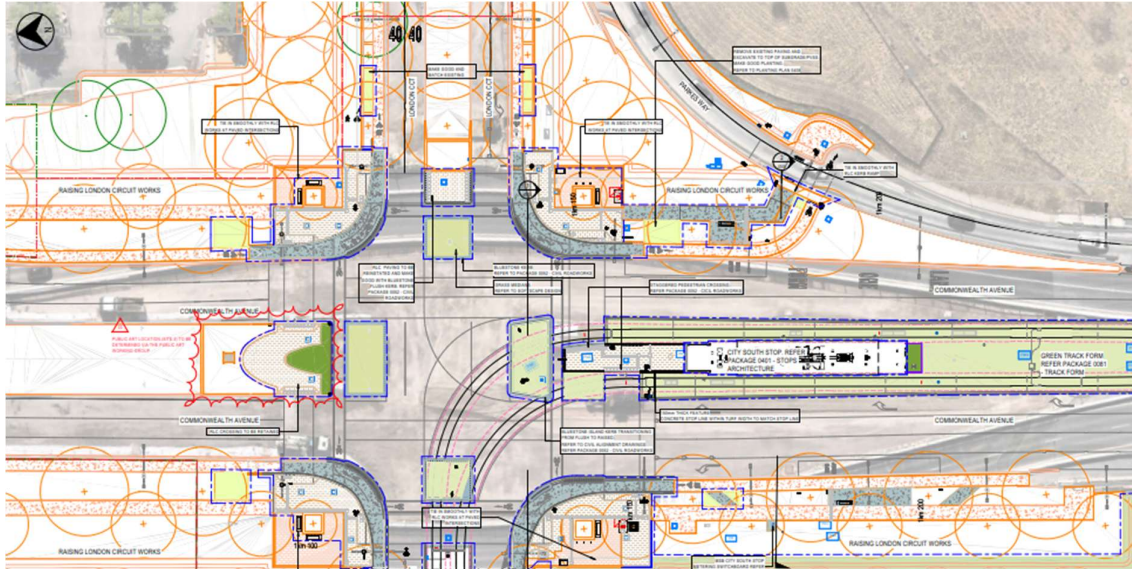


Figure 1 Location of works (Hassell, 2025)

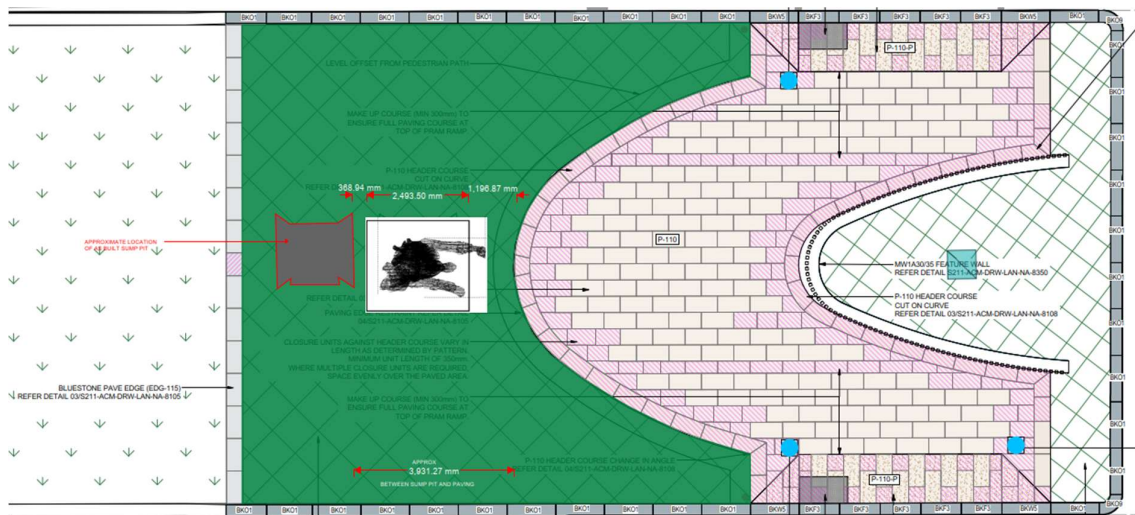


Figure 2 Site plan – detail (Hassell, 2025)

4. The Proposal

4.1 General Description

“The City She Drew” honours Marion Mahony Griffin — the architect, artist, and visionary who significantly contributed to the planning and design of Canberra, and has largely been unrecognised for her work.

The Public Art and Culture Strategy (November 2022) for the Canberra Light Rail Stage 2 identified curatorial precincts to guide the public art strategy. Around City Hill, the curatorial precinct is *Radiating Heart: Women in Design*. This artwork embodies this curatorial theme, drawing on both the physical geometry of the Griffin plan and the emotional resonance of Marion’s largely unseen contribution.

The artwork, designed by April Pine, is a single, 4.5m high sculpture made of Corten steel, assembled from vertical metal sheets with intersecting horizontal sheets (Refer to Figure 3). Marion is shown to have the momentum of walking and being in motion. She holds a gesture of drawing while holding plans. The sculpture is designed to be viewed in the round, with each side sculpted to be reactive to the multiple axes..

The sculpture would sit on a 400mm high, dark-coloured, reinforced concrete plinth surrounded by low-level landscaping to cover the plinth. Currently in the area a garden bed of *Juniperus conferta* exists, the garden bed would be expanded slightly to surround the sculpture and plinth. The plinth is designed to be discreet and would sit just below the height of the surrounding planting, with the Marion Mahony Griffin, standing proud of the landscape. The proposal also includes the installation of four luminaries to provide lighting, which would require underboring and utility works to install.

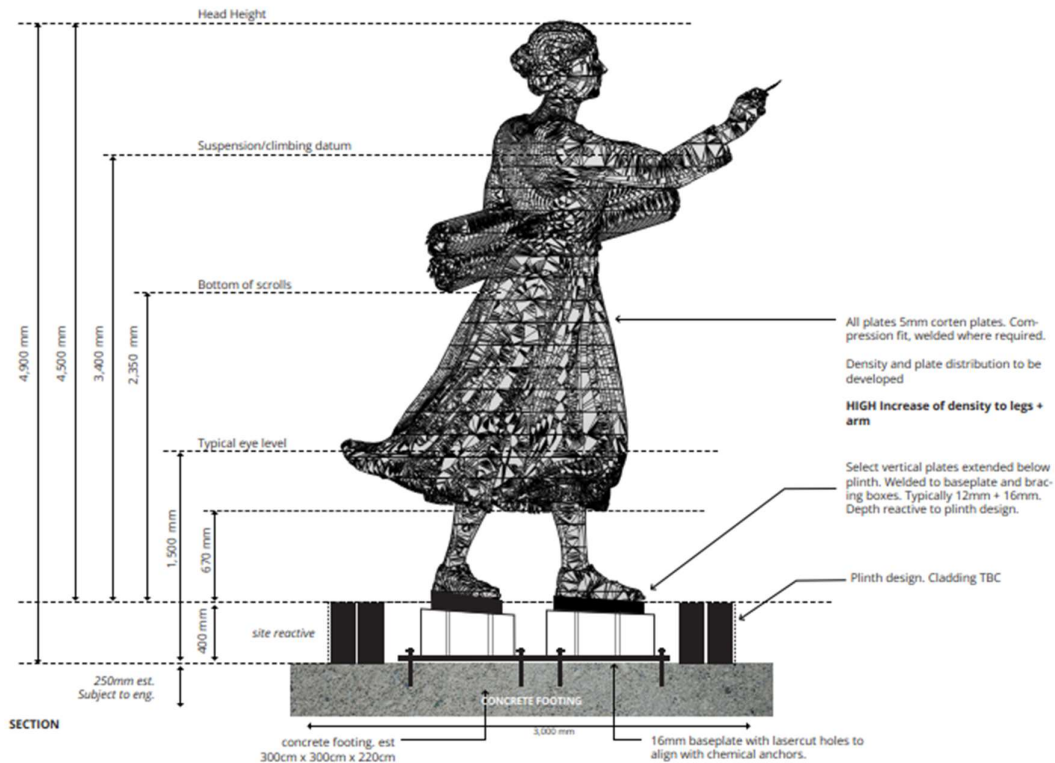


Figure 3 “The City She Drew” sculpture of Marion Mahony Griffin (Image April Pine, 2026)



Figure 4 Indicative perspective looking south towards Lake Burley Griffin (Image – Hassell, 2025)

4.2 Materiality & Maintenance

The artwork is proposed to be made from Corten (weathered) steel and would sit on a reinforced concrete plinth. The use of Corten steel and concrete provide a robust artwork suitable to its proposed location and environment.

The Corten steel sheets would be a combination of 3mm or 5mm providing the structural strength required. The metal sheets are to be individually treated then hammered together to create a compression fit with select welds where required. The methodology requires micromillimetre tolerances which are achieved by using techniques developed in close relationship with regular suppliers.

The finish, being an integrated rather than an applied finish, will develop a natural patina as part of the aging process. The sculpture will be sandblasted and acid washed prior to installation to accelerate the oxidization process. The textured, dark brown rust finish would take about 12 months to settle into its desired colour (refer to figure 5).

With regard to maintenance of the sculpture, graffiti can be sandblasted away, scratches would naturally be weathered into the metal, and any build-up of bird droppings can be power washed without damage to the sculpture.

The species selected for the landscaping, *Juniperus conferta* is a vigorous, hardy plant that is low maintenance and its use is consistent with non-trafficable areas around City Hill.



01. Pre-weathered steel.

Once sculpture is fabricated it will be sandblasted to remove oil and lubricants so a consistent rust colour is achieved.



02. First Acid Wash

Approximate shade at the time of delivery.

Sculpture has its initial acid wash in the studio to minimise initial run off. This occurs 2 - 4 times before delivery to site.



03. First Year

Approximately shade 4-6 months after installation



04. Oxidisation complete

Approximate shade at the end of oxidisation period. 12-18 months after installation

Figure 5 Proposed colour change of the Corten steel during the oxidisation process (April Pine, 2025)

4.3 Construction Methodology

The following details are provided on the construction methodology of works included as part of this application.

- Works will be constructed over a 20 week period, from the end of 2026 to the beginning of 2027.
- Prior to any works commencing, and following all necessary approvals, protection areas will be put in place.
- All services/conduits would be installed first by either open trenching or under boring for the lighting
- Following completion of the services for lighting, construction of the plinth would occur, followed by installation of the prefabricated sculpture.
- Once the sculpture, plinth and lighting is in place, the area around the plinth would be planted with the new soft plantings and other areas would be reinstated.

4.4 Reinstatement Requirements

Any areas that are impacted as part of the proposed works will be rehabilitated, with areas rehabilitated to an equivalent condition prior to the disturbance.

Landscaping and remediation of impacted areas will occur when the works are substantially complete to avoid potential damage and rework of the landscape. The soft landscaping will be maintained after installation to ensure the health and longevity of the landscape planted. Remediated areas requiring grass will be reinstated with 'Canberra Blend' grass.

4.5 Construction management and temporary traffic management

The site of the works will be secured by hording or temporary construction fencing consistent with other construction hoarding used on the Light Rail Stage 2A Project, and construction will be managed in an orderly and safe manner.

Existing vehicle access will be unchanged along Commonwealth Avenue. Temporary traffic measures will be place during the period of proposed works to minimise disturbance to traffic and pedestrian access. A separate Traffic Works Approval will be submitted for any required temporary traffic management.

4.6 Timing

Table 1 outlines the indicative timeframes for delivery of the works once approval is received.

Table 1 Key milestone dates

Key Milestone	Indicative Date
Construction commences	Oct 2026
Completion of civil works / lighting	Dec 2026
Installation of sculpture	Jan 2027
New landscaping / soft-scaping	Feb 2027
Reinstatement works	Mar 2027

4.7 Consultation

A Public Art Working Group (PAWG) was established as part of the Light Rail Stage 2A project, an advisory body to provide guidance to CMC on procurement and design of public art. The PAWG includes representatives from;

- ACT Government Architect (Chair)
- NCA Chief Planner
- iCBR Urban Design Representative
- iCBR First Nations Representative
- artsACT Representative
- City and Environment Directorate (CED) Landscape Architect Representative
- City Renewal Authority (CRA) Place Engagement Lead
- First Nations Ngunnawal Representative

This concept from April Pine was first tabled to the PAWG at PAWG Meeting #4 on 23 May 2025 with the PAWG unanimously endorsing the assessment recommendation to award the commission to the artist.

CMC have also met previously with representatives of the NCA in relation to the works.

5. Environment

CMC have developed a Construction Environmental Management Plan (CEMP) which forms part of the environmental management system used to manage construction impacts during the Light Rail Stage 2A works. The works would also be conducted in the context of the CWA (WA001376) submitted as part of the broader Stage 2A works. These works will be delivered within and in accordance with this management system and are generally outlined below.

5.1 Flora and Fauna

The works would not impact on the habitat of the Golden Sun Moth or any other sensitive flora and fauna.

There is no requirement for tree removal as part of this Works Approval submission.

5.2 Contaminated land

There is the potential for asbestos, and other forms of contamination, to be identified during the works, including, but not limited to asbestos-lined service pits and utilities adjacent to the site.

The works will be undertaken under the CEMP, Contamination Management Plan, and Unexpected Finds Protocol, which includes relevant documentation relating to material management and disposal under EPA Guidelines.

5.3 Noise

Work will typically be undertaken within hours 7am to 6pm, Monday to Friday, and Saturday 7am to 1pm.

Any work that is required to be carried outside of the set hours will be managed through an Out of Hours Work (OOHW) Plan. These are prepared by CMC and provided to iCBR for approval and detail the type of work to be undertaken, equipment used, and other information as necessary. This information is used by the stakeholder and communications team who then consult with potential receivers about the OOHW.

5.4 Erosion and Sediment Control

There is the potential for erosion, and transport of sediment, from the construction area into the surrounding environment. The existing Erosion and Sediment Control Plan (ESCP) for the area will be used for the proposed works.

5.5 First Nations Heritage

It is noted that no indigenous sites within the works area are included on the ACT and Commonwealth Heritage Registers.

For the proposed works, CMC has developed an Unexpected Finds Protocol, which includes a process of management for any Aboriginal archaeological remains.

5.6 Historic Heritage

The works are not within the curtilage or any listed Heritage item, however, is in the vicinity of the Commonwealth Heritage Listed Parliament House Vista (place ID 105466), and City Hill registered on the ACT Heritage Register (20002).

A Heritage Impact Assessment (HIA) conducted in 2023 as part of the Environmental Assessment used to support the Light Rail Stage 2A Works Approval (WA103077). Given the small scale of these works, potential impacts on Historic heritage are considered negligible.

6. Statutory Planning Context

This section sets out the planning context of the works included in this submission against the National Capital Plan.

An assessment of the National Capital Plan legislation has identified the following relevant codes and legislation:

Table 2 Applicable Planning Legislation

Legislation	Relevance
National Capital Plan	Relevant - See Section 5.2 of this report
National Capital Plan General Codes	Not relevant

The proposed works are located along Commonwealth Avenue which is a Main Avenue under the National Capital Plan, and the site enjoys a prominent location within the Central National Area of Canberra.

6.1 Designated Areas

Figure 1 of the National Capital Plan identifies the Designated Areas, and the subject site is located within the central extent of the Designated Areas. Therefore, the National Capital Authority is the consent authority for planning/development approval and the proposal must be assessed as a Works Approval (which is the context of this submission).

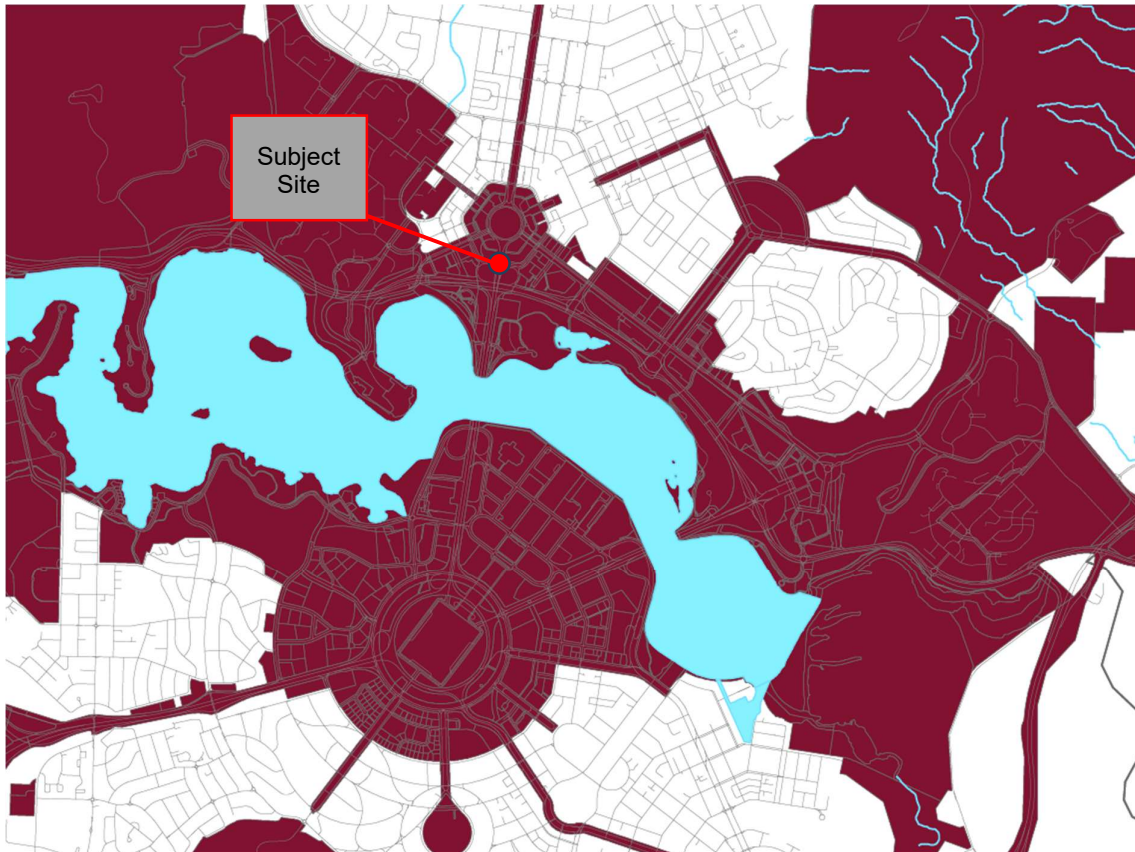


Figure 5 Extract from ACTMapi National Capital Authority - Designated Areas (February 2026)

6.2 National Capital Plan Precinct Codes

The works that form part of this application are located in the City Hill Precinct (Precinct 4) as identified in Figure 6 below. The Precinct Code controls are addressed below.



Figure 6 Extract from Figure 12 in the NCP (December 2025).

6.3 City Hill Precinct Code

The subject site is within the Central National Area and includes works within the City Hill Precinct (Figure 7). Development within this area is guided by general principles as provided in the NCP, while detailed conditions for planning are provided in the Precinct Code. The objectives of the City Hill Precinct Code are addressed in Table 3 below along with a response detailing how the proposed works are not inconsistent with the objectives.

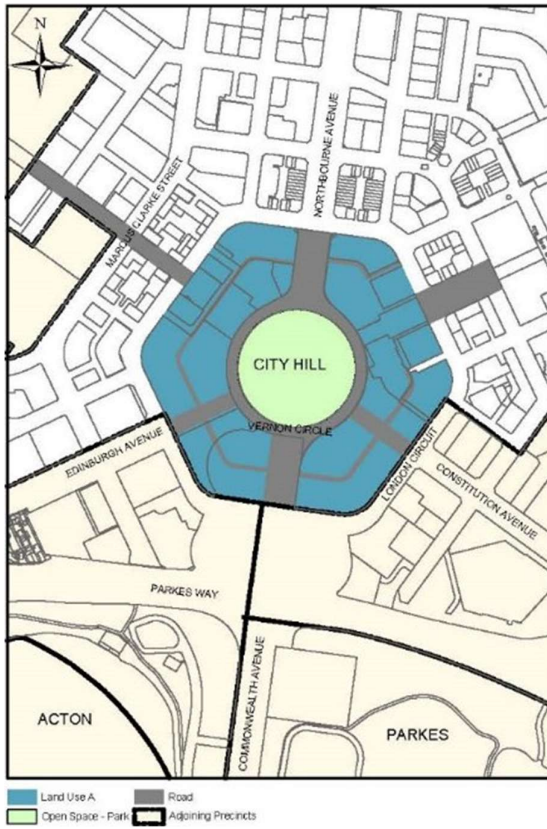


Figure 7 City Hill Precinct (Figure 39 of National Capital Plan) (NCA, 2025)

Table 3 Assessment against City Hill Precinct Code

Control	Response
4.6.3 Objectives for City Hill Precinct	
<ol style="list-style-type: none"> 1. Maintain and promote the City Centre as the main commercial centre of Canberra and the region – with the City Hill Precinct as the preeminent heart of City. 2. The design of buildings and the amenity and environmental quality of the main public spaces should result in an accessible, attractive, high quality and distinctive centre, consistent with the City’s role as the major metropolitan centre and its location at one point of the National Triangle, the major organising element of the Central National Area. 3. That the City Hill Precinct provides a vibrant, interesting and lively centre with high levels of human activity. 4. Development must command the highest standards of urban design, sustainability, exemplary architecture 	<p>The proposed works are not inconsistent with the objectives for the City Hill Precinct.</p> <p>No building works are proposed and therefore objectives in relation to built form are not relevant to this specific application.</p>

<p>and social inclusion, reflecting the character of the National Capital.</p> <ol style="list-style-type: none"> 5. The City Hill Precinct must complement and actively relate to, and integrate the existing and future structure of the rest of City. 6. Encourage a mix of land uses, including residential uses, which contribute to a diverse and active character. 7. Major buildings of municipal or cultural significance should be located adjacent Hill Park, with their main address to Vernon Circle. 	
<p>4.6.4 Land Use for City Hill Precinct</p>	
<p>Land use for the City Hill Precinct should be in accordance with Figure 39.</p>	<p>The works are proposed in the area listed as “Road” in Figure 39 of the NCP.</p> <p>The works would be in accordance for the Land Use within the City Hill Precinct.</p>
<p>General</p>	
<p>New or altered buildings must ensure that:</p> <ol style="list-style-type: none"> 1. Sunlight access to open space within the City Hill Precinct and major pedestrian areas is maintained. 2. The vista to City Hill Park is framed and enhanced by new development. 3. Predominantly active frontages are provided at ground floor level for building elements fronting London Circuit and the Main Avenues that radiate from City Hill. 4. Subdivision patterns should be designed to minimise amalgamation of land and achieve a mix of development scales including fine urban grain. 5. New buildings are encouraged to be delivered through design competitions in order to encourage innovation and design excellence. 6. The symbolic importance of the City Hill Precinct should be reinforced in the design treatment of the streetscape and public places. 7. Public art and art spaces in new development should be encouraged. 8. Landscape and streetscape treatments are to be of a high quality emphasising 	<p>Not Applicable. No new or altered buildings are proposed as part of this WA.</p> <p>However, the proposed works being public art is consistent and supports the development requirement for public art and art spaces in this precinct.</p>

<p>the geometry and formality of the Main Avenues.</p> <p>9. New development should exemplify sustainability principles and demonstrate excellence in urban design, landscaping and architecture.</p>	
<p>City Hill Park as a central open space</p>	
<p>City Hill Park should be retained and enhanced as an enclosed central park serving a functional role within an urban built form.</p> <p>The topography of City Hill Park may need to be modified to create an urban park, accommodate pedestrian desire lines and integrate with Vernon Circle.</p> <p>City Hill Park is the primary public place for the Precinct. Any buildings located on City Hill Park must be ancillary to this purpose and be designed, sited and of a scale that complements the landscape character.</p> <p>New public spaces created within the Precinct must complement and not diminish the pre-eminence of City Hill Park.</p>	<p>The proposed works do not impact on the continuing function of City Hill Park in its role as a central open space.</p>
<p>Open space- Building Height</p>	
<p>Building heights of up to 25 metres (generally six to eight storeys) above adjacent kerb levels of London Circuit, Vernon Circle and Northbourne, Edinburgh, Constitution and Commonwealth Avenues are permissible in all areas of City Hill Precinct.</p> <p>Landmark buildings up to RL617 (generally 14 to 18 storeys) will be restricted to the locations identified in Figure 42, generally being the corners of the main avenues intersecting with London Circuit.</p> <p>Buildings more than 25 metres in height are to be the subject of wind testing, including down draught conditions and turbulence, to ensure development does not have adverse impacts on building entrances and the public domain.</p> <p>Buildings fronting Vernon Circle should have a minimum height of 16 metres (equivalent to four storeys) to create a sense of enclosure around City Hill Park.</p> <p>Minor building elements that extend building height above 25 metres will be considered where this enhances the architectural quality</p>	<p>Not Applicable. No buildings are proposed as part of this WA.</p>

<p>of the building and fosters energy efficiency, indoor amenity and appropriate urban scale.</p>	
<p>Active frontages</p>	
<p>Street level frontages should, where possible, be active. Primary retail activities should be off London Circuit with secondary food and beverage activities occurring along north-south laneways so as to optimise sunlight access during peak periods. Buildings on the avenues must have predominantly active frontages at ground floor</p>	<p>Not Applicable. Street frontages and buildings are unchanged as a result of works proposed in this WA.</p>
<p>Avenue connections and vistas</p>	
<p>New road connections to Vernon Circle from Constitution and Vernon Circles should facilitate access for local traffic and pedestrians.</p> <p>View corridors must be retained from radiating avenues to City Hill Park. No buildings should bridge these avenues.</p> <p>A limited palette of high-quality pedestrian pavement materials, street furniture and lighting will be used. Pavement and landscape design should have an elegant, simple and bold design emphasising the geometry and formality of the main avenues.</p>	<p>Not Applicable. No new road connections are proposed as part of this WA.</p> <p>The sculpture will enhance the view of the vista of City Hill to Commonwealth Avenue and provide an opportunity for pedestrians to reflect on the connection on the avenue.</p> <p>Landscaping is consistent with the existing landscaping.</p> <p>Lighting will be consistent with luminaires proposed as part of the Light Rail works for Stage 2A.</p>
<p>Heritage</p>	
<p>The heritage values of the Sydney and Melbourne Buildings are to be considered and addressed by new buildings adjacent to these sites.</p>	<p>Not Applicable. The proposed works would not impact on the heritage value of the Sydney and Melbourne Buildings.</p>
<p>Traffic</p>	
<p>Major modifications to the existing traffic management arrangements are dependent upon the continuing implementation of peripheral parkways and city bypass routes including Gungahlin Drive, Majura Parkway, Clunies Ross Street, Fairbairn Avenue, Marcus Clarke Street and Cooyong/Ballumbir Streets and the removal of the Parkes Way cloverleaves.</p> <p>Traffic engineering devices (e.g. slip lanes) should be designed to promote pedestrian amenity, safety and access and bicycle movements</p>	<p>Not Applicable.</p> <p>No modifications to traffic arrangements are proposed as part of these works.</p>

<p>Parking</p>	
<p>Replacement of existing surface car parks and public car parking should be provided for as identified in the ACT Government Parking Strategy. Development of existing surface car parks will need to demonstrate that an adequate public car parking provision (on street or in appropriately designed structures) will meet the needs of City Hill Precinct.</p> <p>Car parking for new development is to be accommodated in basements or in above ground structures that do not dominate the public domain.</p>	<p>Not Applicable.</p> <p>No modifications are being made to existing car parks or car parking demand as part of this WA.</p>
<p>Public transport</p>	
<p>London Circuit should operate as the main public transport circuit for Canberra City.</p> <p>Redevelopment of the City Hill Precinct should take place in the context of an integrated public transport plan.</p> <p>Mechanisms should be introduced to give priority to public transport.</p>	<p>Not Applicable.</p>
<p>Laneways</p>	
<p>Existing laneways should be retained and new laneways created to provide permeability and create service access. Opportunities should be identified to create laneways with active frontages, particularly in relation to heritage and public buildings and at intersections.</p>	<p>Not Applicable.</p> <p>No laneways are proposed.</p>
<p>Pedestrian and bicycle links</p>	
<p>New development, including public spaces, will facilitate pedestrian connectivity and bicycle movements within the City Hill Precinct and between the City Hill Precinct and Canberra Central.</p>	<p>The proposed works will not impact on the safe movement of bicycles and pedestrians through the London Circuit and Commonwealth Avenue intersection.</p>

6.4 Main Avenues and Approach Routes Precinct Code

The proposed works are located within the Main Avenues and Approach Routes Precinct.

Development within this area is guided by general principles as provided in the NCP, while detailed conditions for planning are provided in the Precinct Code.

Table 4 Assessment against the Main Avenues and Approach Routes Precinct Code

Control	Response
4.15.3 Objectives for Main Avenues and Approach Routes	
<ol style="list-style-type: none"> 1. Establish and enhance the identity of the approaches to the Central National Area as roads of national significance and, where relevant, as frontage roads for buildings which enhance the National Capital function and as corridors for a possible future inter-town public transport system. 2. Ensure that works within the road reservations are carried out to the highest standards, by maintaining and enhancing landscaping, and by facilitating the flow of traffic as far as possible. 3. Reinforce and, where possible, express the integrity of the Griffin Plan’s visual structure by strengthening the geometry and form of main avenues, vistas and public spaces. 4. Improve the urban design and streetscape qualities of the Main Avenues as approaches to the Central National Area. 	<p>The sculpture is consistent with the objectives for the Main Avenues and Approach Routes Precinct.</p> <p>The sculpture is proposed within a road reservation, and has been designed to the highest standards and will be incorporated into the existing landscape.</p> <p>The sculpture improves the urban design and streetscape quality of Main Avenues through improvements to the public realm. It is consistent with the landscaping proposed for LRS2A that continues the formal planting of Main Avenues as expressed in the Commonwealth Avenue Master Plan, and public realm design elements that are commensurate with the character and quality befitting of the Central National Area.</p>
4.15.4 Detailed conditions of planning, design and development	
General	
Traffic is to be managed to ensure the continued effective function of the Main Avenues and Approach Routes. The Main Avenues will provide access to fronting buildings where practicable, and where traffic safety and flows are not adversely affected.	<p>Not Applicable.</p> <p>No modifications to traffic arrangements are proposed as part of these works.</p>
Landscaping	
The Main Avenues and Approach Routes will be developed and maintained as high quality landscaped corridors. In built-up areas, the established design theme of verges and medians and formal tree plantings will be	The sculpture will be incorporated into the existing landscaped corridor for the Main Avenues of Commonwealth Avenue.

<p>maintained. In areas of intensive pedestrian use, high quality paving is to be used.</p>	
<p>Signs</p>	
<p>Signs will generally comprise traffic, directional and visitor information signs, and unnecessary repetition will be avoided. Commercial roadside signs are not permitted in road reservations, except on bus shelters. Non-commercial signs may be permitted where they comply with the requirements for signs set out in the Signs General Code.</p>	<p>Signage for the sculpture will comprise of a memorial signage with the name of the sculpture, date and artist details. Therefore, the Signs General Codes does not apply.</p>
<p>Streetscape design</p>	
<p>A streetscape hierarchy, that complements the road hierarchy, should be established.</p> <p>This hierarchy should give primacy to main avenues, emphasise continuity along their length through avenues of appropriately scaled trees, consistent pedestrian pavement materials, street furniture and lighting.</p> <p>Development should generally be constructed to the street boundary to define and enclose streets and create continuous street frontage while allowing variations in individual buildings and uses.</p> <p>A limited palette of high quality pedestrian pavement materials, street furniture and lighting will be used. Pavement and landscape design should have an elegant, simple and bold design emphasising the geometry and formality of the main avenues.</p> <p>Streetscapes are to be well lit for pedestrians and optimise security and safety for night time use.</p>	<p>The material for the sculpture are high quality in design and the lighting strategy is appropriate for the Central National Area, as detailed in the response to the NCA Outdoor Lighting Policy addressed below. Lighting for the sculpture will be consistent with the lighting strategy for LRS2A.</p>

6.5 NCA Outdoor Lighting Policy

This Policy is applicable to proposed external lighting within the Central National Area.

Table 5 Assessment against the Outdoor Lighting Policy

Control	Response
Part one: urban context - Strategies	
1a) Express the key geometric elements of the Griffins' formally adopted plan for the city through lighting design and distribution.	
<ol style="list-style-type: none"> 1. Emphasise the three node points of the Griffins' National Triangle by creating and maintaining strong visual 'anchors' at Parliament House, City Hill and Russell. 2. Create a unique identity for the roads that form the Griffins' National Triangle, being Commonwealth, Kings and Constitution Avenues, through careful selection and installation of an integrated suite of street furniture and lighting. Achieve a high degree of uniformity in lighting performance on these three main avenues. 3. Illuminate the Griffins' Land Axis by retaining the existing ANZAC Parade street lighting and illumination of Federation Mall. 4. Reinforce the Griffins' Water Axis by illuminating the promenade along the southern foreshore, Commonwealth Place and the International Flag Display. 5. Use full cut-off light fittings in all landscape areas, roads, paths and car parks within the Central National Area (except where noted in this policy). 6. Use full cut-off street and pedestrian lighting on all main avenues that contributes to their development as high quality landscape boulevards. 7. Align lighting hardware to strengthen the framing of the National Triangle, main avenues and formally landscaped open spaces. 	<p>Lighting for the sculpture will be consistent with the lighting strategy for LRS2A.</p> <p>The lighting strategy for LRS2A facilitates the expression of the Griffin Plan during darker hours through achieving uniformity of illumination and consistency with the landscape setting and public realm and complementing the formal character of Main Avenues and open spaces within the Central National Area.</p>
1b) Create a clear hierarchy of built environment illumination in central Canberra.	
<ol style="list-style-type: none"> 1. Illuminate the exterior of key built elements to reflect their relationship to Griffin's National Triangle and their symbolic function, according to the following comparative luminance values in candela per square metre (cd/m2): 	<p>Lighting for the sculpture will be consistent with the lighting strategy for LRS2A.</p> <p>The lighting strategy for LRS2A considered the illumination requirements of the National Triangle and is located to minimise glare and</p>

<p>Level Four- all other buildings adjacent to Constitution Avenue = (5cd/m2)</p> <ol style="list-style-type: none"> 2. Create a dramatic backdrop by restricting the use of external lighting for other buildings within City Hill Precinct, Parkes, Reid, Campbell and Russell to entrances, window displays and signage. Consideration will be given to additional building lighting where it contributes to identity, legibility, silhouette, architectural expression, façade articulation and Canberra's unique skyline at night. 3. Use full cut-off light fittings for new building façade lighting installations, that are carefully integrated into the building's structure. 4. Minimise any sources of light spill or glare throughout Commonwealth Park, Kings Park, Rond Terrace, Black Mountain Peninsula, Yarralumla Bay, Weston Park, Grevillea Park, Yarramundi Reach, Acton Peninsula and Kingston Foreshore. 5. Minimise any sources of light spill or glare beyond the intended area to be lit. 	<p>provide the necessary illumination to achieve required standards.</p> <p>Proposed lighting retains the city backdrop within the City Hill precinct.</p>
<p>1c) Maintain subtle illumination of the city's topography.</p>	
<ol style="list-style-type: none"> 1. Consider identification of Red Hill and Mount Pleasant through the installation of a single light source, such as a navigational lighting beacon. 2. Use full cut-off lighting of pedestrian pathways and landscape areas in proximity to the edge of Lake Burley Griffin around West, Central and East Basin, that effectively manages the unwanted effects of light spill on the lake ecosystem (unless otherwise noted in this policy). 3. Use full cut-off lighting in all areas of the Inner Hills to control the effects of light spill. 	<p>Lighting is not proposed to the Inner Hills or edge of Lake Burley Griffin.</p>
<p>1d) Conserve significant heritage lighting fabric and design elements.</p>	
<ol style="list-style-type: none"> 1. Consider all relevant Heritage Management Plans in developing lighting designs. 2. Retain the essential character and lighting performance characteristics of any existing lighting installation with identified heritage value, in any 	<p>Lighting for the sculpture will be consistent with the lighting strategy for LRS2A and will not impact on heritage items.</p>

<p>proposed maintenance or replacement activity.</p> <p>3. Preserve the appearance, location and layout of lighting installations with heritage value.</p> <p>4. Do not replicate or extend poor performing heritage lighting hardware into new areas or in new installations.</p>	
<p>Part two: Place-making – Strategies</p>	
<p>2a) Ensure the scale and character of lighting is appropriate to the location.</p>	
<ul style="list-style-type: none"> • Use lighting standards and categories of a lighting type and quality that is appropriate to the application and location. • Light public art installations with individual designs according to the intentions of the artist, where it is not contrary to the objectives or strategy of this policy. • Manage the inter-relationship of lighting intensity and character between all structures, landscape elements and buildings. • Ensure that the colour and finish of light poles and fittings in landscape areas integrates with and visually complements their surroundings. Lighting installations in proximity to the edge of Lake Burley Griffin must mitigate the visual impact of poles or fittings on the landscape during the day. • Add visual interest to public spaces through engaging, interactive lighting designs where appropriate. • Locate light sources and poles to highlight the repetition and rhythm of their form, spacing and pattern, giving consideration to the definition of space and their role as sculptural elements in the urban landscape. 	<p>Lighting for the sculpture will be consistent with the lighting strategy for LRS2A.</p> <p>The siting of luminaires has been designed to complement the surrounding context and is consistent with the City to Commonwealth Park urban design context.</p> <p>The lighting for this public art installation meets the objectives of this policy.</p>
<p>2b) Ensure the form, material and finish of lighting hardware is appropriate to the location and co-ordinated with other street and park furniture so as to form an integrated, cohesive palette of materials and fittings.</p>	
<ul style="list-style-type: none"> • Use high quality light fittings and hardware with a high standard of detail and finish. • Locate lighting hardware outside key desire or movement lines, to optimise accessibility and safety. 	<p>Lighting for the sculpture will be consistent with the lighting strategy for LRS2A.</p>

<ul style="list-style-type: none"> • Locate lighting hardware around trees, signs, and street furniture to achieve a spacing, pattern and alignment that complements these and other urban elements. • Consider opportunities for integration of lighting into street furniture, built form or road/bridge structures. • Co-ordinate the colour and finish of light poles and fittings and with other lighting hardware and street furniture. • Develop lighting plans in advance of any wide-scale installation or replacement of poles or fittings within the Parliament House Vista and Lake Burley Griffin and adjacent parklands. Address the context and the character of the landscape setting and its elements including street furniture in the lighting plans. 	
<p>2c) Ensure the colour and form of the physical environment is accurately rendered.</p>	
<ul style="list-style-type: none"> • Use lamps that offer a colour temperature close to the appearance of daylight (approximately 4500-6500 degrees Kelvin). • Select lamps that offer good colour rendering ability, of 80 or greater on the Colour Rendering Index. • Select lamps and fittings that provide the most accurate colour rendition of landscape possible throughout the parklands surrounding Lake Burley Griffin, along the main avenues, and in the Parliamentary Zone. 	<p>Lighting for the sculpture will be consistent with the lighting strategy for LRS2A.</p>
<p>Part three: Safety – Strategies</p>	
<p>3a) Maintain a well-connected movement network of public paths, roads and spaces.</p>	
<ul style="list-style-type: none"> • Install and maintain lighting throughout the network of pedestrian and cycling paths and formally-recognised public spaces in the Central National Area. • Install and maintain lighting on all public roads and car parks in accordance with the volumes and patterns of activity and their role within Canberra's transport network. • Select light poles and locations that minimise the risk of injury for people travelling on paths or roads. 	<p>Lighting for the sculpture will be consistent with the lighting strategy for LRS2A.</p> <p>Lighting responds to the needs of diverse public space users and luminaires are located to minimise risk of injury for road and path users.</p>

3b) Ensure Australian Standards for illumination are met as a minimum.	
<ul style="list-style-type: none"> • Demonstrate compliance of lighting design proposals with the Australian Standard AS/NZS 1158 - Lighting for Roads and Public Spaces and the suitability of the proposed lighting category for the intended application. • Demonstrate compliance of lighting design with other relevant Australian Standards relating to the installation and operation of outdoor lighting. Where an inconsistency arises between this policy and any Australian Standard, this policy prevails. 	<p>Lighting for the sculpture will be consistent with the lighting strategy for LRS2A.</p>
3c) Effectively manage glare	
<ul style="list-style-type: none"> • Select lamps of the lowest required intensity. • Select light fittings and optical systems that shield light from being directed sideways or upwards. • Locate light sources beyond the typical field of view for people in any given area, through the location and scale of light poles and fittings. • Minimise any sources of light spill or glare beyond the intended area to be lit. 	<p>Lighting for the sculpture will be consistent with the lighting strategy for LRS2A.</p> <p>Lighting associated with the sculpture would be designed to limit spill into non-target areas and up-lighting would be capped by structures. Light colour would be designed to complement the adjacent area.</p>
3d) Create integrated lighting designs that enable the human eye to adapt to changes in light levels.	
<ul style="list-style-type: none"> • Achieve a high degree of uniformity in illumination levels along pathways and roads. • Install transitional lighting treatments between areas of contrasting illumination that accommodate the human eye's capacity to adapt to changes in light levels. 	<p>Lighting for the sculpture will be consistent with the lighting strategy for LRS2A.</p>
Part four: Environment and sustainability – Strategies	
4a) Manage light pollution through the selection and placement of lighting hardware.	
<ul style="list-style-type: none"> • Use full cut-off light fittings, lens diffusers, or light sources that provide indirect or reflected light (unless otherwise noted in this policy). • Select optical systems and shielding designs for artificial light sources that effectively manage glare and light distribution behind and above the light source. 	<p>Lighting for the sculpture will be consistent with the lighting strategy for LRS2A.</p> <p>Lighting associated with the Project would be designed to limit spill into non-target areas and up-lighting would be capped by structures. Light colour would be designed to complement the adjacent area.</p>

<ul style="list-style-type: none"> • Install and operate lighting only where it responds to a demonstrated need or requirement. Consider the removal of lighting where it does not fit this criteria. • Co-ordinate the removal or replacement of existing light fittings in proximity to any proposed lighting works to reduce variances in lighting hardware and effect. • Minimise the distribution of artificial light beyond the intended area to be lit. 	
<p>4b) Minimise energy use.</p>	
<ul style="list-style-type: none"> • Select lighting hardware components that offer a long service life, feature an enduring aesthetic appeal, be of a high quality construction and offer reliable, low maintenance performance. • Consider energy use and value for money in any lighting upgrade or new installation. • Install efficient lighting control systems that can adjust illumination to suit activity levels, saving energy whilst maintaining safety when required. • Use co-ordinated lighting management systems to reduce energy and maintenance and improve uniformity and safety. 	<p>Lighting for the sculpture will be consistent with the lighting strategy for LRS2A.</p> <p>Lighting associated with the Project would be designed to limit spill into non-target areas and up-lighting would be capped by structures. Light colour would be designed to complement the adjacent area.</p>
<p>4c) Ensure the installation and maintenance of lighting infrastructure does not have a detrimental effect on landscape.</p>	
<ul style="list-style-type: none"> • Design light poles and outreach arms around the long-term form of trees to maintain light performance and minimise tree maintenance. • Locate light poles and power cables around established tree and root locations. 	<p>Not applicable. No lighting poles or lighting around trees is proposed as part of this application.</p>
<p>4d) Minimise the impact of lighting operation on wildlife health.</p>	
<ul style="list-style-type: none"> • Use full cut-off light fittings within landscape areas to reduce impact on wildlife. • Reduce the intensity or turn off lighting at times it is not needed in landscape areas, to reduce impact on wildlife. • Reduce the intensity and duration of external building lighting operation during migration periods of the Bogong moth in October and between February and April. Shut off lights that are not 	<p>Lighting for the sculpture will be consistent with the lighting strategy for LRS2A.</p> <p>Light fittings will be selected to provide required illumination to meet relevant standards and limit the need for unnecessary lighting.</p>

needed during the second half of the night at times of peak moth migration.

- Ensure that the design and operation of lighting does not cause wildlife or avifauna disorientation, injury or death.

7. Other Matters

7.1 National Capital Design Review Panel

This application is for a standalone sculpture given the scale of the works and consultation already undertaken as part of the Public Art Working Group, this proposal has not been presented to the National Capital Design Review Panel.

8. Conclusion

This Works Approval application submission has been designed to address the provisions of the PALM Act and National Capital Plan.

This report has demonstrated that works are not inconsistent with the National Capital Plan and create no adverse impacts.

The proposed works address all relevant statutory planning controls and considerations, and therefore it is concluded that the proposed works are not inconsistent with the provisions of the PALM Act and National Capital Plan.

Accordingly, the proposal warrants the support of the NCA through a positive determination of the Works Approval application.

Attachment A

Document No.	Revision No.	Date	Title
07-HAS-DRW-LAN-DO-0108	00	19/08/2025	Site Plan
S211-ACM-DRW-LAN-NA-8124		07/02/2026	Site Plan - Detail
		07/02/2026	Indicative Section
		07/02/2026	Marion Mahoney Griffin Proposal – April Pine