



**Australian Government**  
**National Capital Authority**

# Consultation Report

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## Works Approval No 101744

10 Canterbury Crescent, Deakin  
(Block 14 Section 3 Deakin)

Demolition of Existing Dwelling and Construction of  
Three Dwellings

*Monday 20 April 2020*

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# Introduction

**Under the *Australian Capital Territory (Planning and Land Management) Act 1988*, the National Capital Authority (NCA) prepares and administers the National Capital Plan (NCP) to ensure Canberra and the Territory are planned and developed in accordance with their national significance.**

The Plan sets out the broad planning framework for the Australian Capital Territory (ACT). Areas designated as having special characteristics of the National Capital are subject to detailed planning policies and guidelines. Any buildings or structures, demolition, landscaping or excavation works in Designated Areas require the approval of the NCA. The NCA considers such proposals in the context of the relevant provisions of the Plan.

## BACKGROUND

On 20 December 2019 an application for works approval was received by the NCA from TT Architecture for the demolition of the existing dwelling and the construction of three dwellings at Block 14 Section 3 Deakin.

The application is for the:

- Demolition of the existing residential dwelling on Block 14 Section 3 Deakin
- Removal of the following trees:
  - 1 *Ulmus glabra*
  - 1 *Eucalyptus mannifera*
  - 1 *Cedrus deodara*
- Construction of three new residential dwellings (with one and two storey components)
- Landscaping works within the site boundary

The proposal for three dwellings (with one and two storey components), presents as one building form the Canterbury Crescent frontage. Access to the garage of each dwelling is via the existing driveway adjacent to the south east boundary. The dwellings are separated by courtyards and encircled with soft landscaping. Primary living areas have a northwestern orientation and maintain privacy for and to neighbouring properties. The proposed materials and finishes are of high quality with neutral finishes.

The dwellings are heavily screened by existing soft landscaping on the northern boundary, which abuts The Lodge Park. Existing and proposed soft landscaping will largely screen the dwellings from the Canterbury Crescent frontage.

The existing dwelling and adjacent verge are not listed on any heritage register or other list. There are no registered trees on the Block.

Block 14 Section 3 Deakin has an area of 1769m<sup>2</sup> and is located within a Designated Area of the National Capital Plan. Pursuant to Part III (12) of the *Australian Capital Territory (Planning and Land Management) Act 1988* any proposed 'works' within a Designated Area are required to be submitted to the NCA for assessment against the relevant provisions of the National Capital Plan.

# Public Consultation requirements

## 1.1 National Capital Plan (NCP)

Under the NCP, requirements for public consultation apply to:

- Major developments proposed for Section 9 Barton;
- A landmark building to RL617 adjacent to Commonwealth Avenue (within the Constitution Avenue and Anzac Parade Precinct);
- Detailed plans for development at Academy Close, Campbell;
- High-impact telecommunications facilities;
- All residential proposals within the Deakin/Forrest Residential Area Precinct; and
- All residential and commercial development proposed for Section 5 Campbell.

Public consultation was undertaken on the application as it is mandatory under the National Capital Plan.

## 1.2 Commitment to Community Engagement

The NCA's 'Commitment to Community Engagement' details how the NCA conducts consultation. The purpose is to achieve a greater level of consistency and transparency in the NCA's decision making process.

The 'Commitment to Community Engagement' describes the minimum requirements for consultation, and the process by which Works Approval (WA) applications that are released for public consultation will be assessed.

Part 2.7 *Works Applications and Attachment C Protocol for Development Applications for Works Which Require Consultation* of the NCA's 'Commitment to Community Engagement' describes the consultation process for WA applications. The NCA undertakes an assessment of whether a proposal is consistent with the National Capital Plan and level of public consultation required. An assessment is made in relation to adverse impacts on:

- public space and community amenity;
- environment, heritage or landscape values;
- amenity of the locality in terms of materials, finishes, scale, massing, design and quality; and
- consistency with an existing Heritage Management Plan.

When an application for works is lodged and public consultation is required, consultation with the community and stakeholders will be undertaken by the applicant, the NCA or both. Where consultation is undertaken by the applicant, the NCA may choose to stipulate specific requirements that the applicant is required to implement.

The NCA may set aside the requirement to undertake full public consultation where:

- previous consultation has been undertaken on the proposal;
- minor amendments to previously approved works are required;
- the NCA determines no stakeholders will be affected; and
- proposals are given exemption, as outlined in Part 2.3 of the 'Commitment to Community Engagement'.

Public consultation was undertaken as it is a mandatory requirement under the NCP, and significant community interest has been demonstrated in recent developments of the precinct and in planning policy proposals for the Deakin Forrest Residential Area Precinct.

## Summary of Public Consultation

### 2.1 The public consultation process

Public consultation was undertaken on the WA application by the NCA between Friday, 21 February 2020 to Friday, 13 March 2020. Consultation took the form of:

- On Saturday 22 February 2020, the NCA published a public notice in *The Canberra Times* detailing the proposed works and inviting submissions to be made to the NCA in relation to the proposal ([Attachment A](#)).
- Between 21 February 2020 and Friday, 13 March 2020, the NCA published the proposal and plans on the NCA's website.
- On 21 February 2020, one A1 size sign was placed on the subject site. It was removed on 13 March 2020 ([Attachment A](#)).
- On 21 February 2020 the NCA wrote to key stakeholders and community groups via email advising of the consultation process and inviting comments. They included:
  - Prime Minister and Cabinet ([vipops@pmc.gov.au](mailto:vipops@pmc.gov.au))
  - Forrest Residents ([mail@forrestresidents.asn.au](mailto:mail@forrestresidents.asn.au))
  - ISCCC ([chair@isccc.org.au](mailto:chair@isccc.org.au))
  - [angelatravelling@hotmail.com](mailto:angelatravelling@hotmail.com)
  - [mrynapier@yahoo.com.au](mailto:mrynapier@yahoo.com.au)
  - [Cvincent08@optusnet.com.au](mailto:Cvincent08@optusnet.com.au)
  - [Active\\_planning@me.com](mailto:Active_planning@me.com)
  - [Elliot\\_alex@hotmail.com](mailto:Elliot_alex@hotmail.com)
- On 21 February 2020, the NCA sent hard copy letters to all adjoining and near-by neighbours advising of the consultation process and inviting comments. They included:
  - 35 State Circle
  - 33 State Circle
  - 8 Canterbury Crescent
  - 11 Canterbury Crescent
  - 13 Canterbury Crescent

On Monday 15 March, the applicant was provided a copy of all submissions made during the consultation process, omitting names and personal information.

On 23 March 2020, the NCA provided formal advice to the applicant on changes that would be required to the proposal to address community concerns. The applicant provided a Tree Management Plan on 26 March 2020.

### 2.2 Key issues raised during consultation and NCA response

The NCA received a total of 17 submissions on the proposal. Three in support and 14 against. The main issues raised were:

- The proposal is not in keeping with the character of the area;
- Traffic and parking impacts;
- Insufficient setbacks; and
- Soft landscaping ratio.

Emails of acknowledgment were sent to submitters advising them that their submission would be taken into consideration before a decision is made. Issues raised in the submissions and NCA responses to all issues are detailed in [Attachment B](#) of this report.

## Conclusion

The NCA's consultation process was carried out in accordance with the Plan and the NCA's 'Commitment to Community Engagement'. The NCA has considered issues raised in the submissions as part of the assessment process.

On 23 March 2020, the NCA requested further information and a Tree Management Plan. The applicant provided responses and a Tree Management Plan on 26 March 2020.

The NCA believes that key concerns raised during the public consultation period have been addressed. The proposal is *not inconsistent* with the National Capital Plan and the Deakin/Forrest Residential Area Precinct Code – Landscape and Sustainability Guidelines.

On 20 April 2020, the NCA approved the proposal.

# Attachment A – The Canberra Times Public Notice and Site Notice

The Canberra Times Notice – Published on Saturday 22 February 2020



**Australian Government**  
**National Capital Authority**

## WORKS APPROVAL

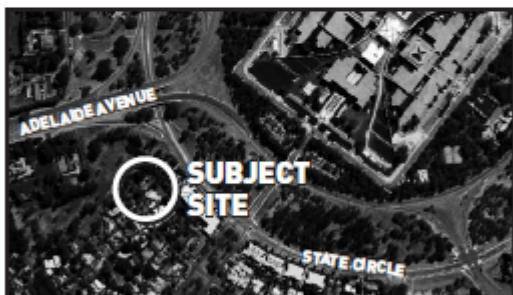
Open for Public Consultation

**Block 14 Section 3 Deakin  
(10 Canterbury Crescent)**

**Demolition of existing dwelling and construction of three residential dwellings**

The National Capital Authority (NCA) has received a Works Approval (WA) application from TT Architecture for the demolition of the existing dwelling and construction of three residential dwellings.

The plans and supporting documentation for this WA application can be viewed on the NCA's website.



The NCA welcomes feedback on this application **by close of business Friday 13 March 2020**. Submissions can be made via email to [worksapproval@nca.gov.au](mailto:worksapproval@nca.gov.au) or GPO Box 373, Canberra ACT 2601.

Please contact the NCA for further information on (02) 6271 2888.

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Site Notice and Proof of Erection of Sign on Friday 21 November 2020



*Building the National Capital in the hearts of all Australians*

## HAVE YOUR SAY



### WORKS APPROVAL BLOCK 14 SECTION 3 DEAKIN (10 CANTERBURY CRESCENT)

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Please contact the NCA for further information on (02) 6271 2888



# Attachment B – Detailed Submissions

The National Capital Authority (NCA) undertakes an open and transparent works approval application process. As part of this process the NCA prepares a Consultation Report for publication on the NCA website, which includes each submission, along with the name of each person making the submission.

Submission	Comment/Issue	NCA Response
<b>1.</b>	<b>Ms Fiona Poot</b>	
1.1	<p>I fully applaud the upgrading and updating of houses in this area.</p> <p>I have looked at the drawings and associated documents for the redevelopment at 10 Canterbury Crescent and find it to be a very sympathetic development which can only add to the amenity of the area.</p> <p>The extensive retention of old garden features available to each of the proposed dwellings makes for a charming environment which would be enjoyed by three separate occupants. Given the size of the block, I fear that the alternative of one dwelling being erected on the site would lead to an overlarge house not at all in keeping with the area and, in addition, available to one group only rather than three.</p>	Noted.
<b>2.</b>	<b>Mr Brand and Ms Peta Hoff</b>	
2.1	<p>This application is not in accordance with guidelines for our area. Our area guidelines are for single block, single buildings to maintain the character of the suburb.</p>	<p>The site is located within Figure 28 – Deakin Forrest Residential Precinct of the National Capital Plan (NCP). The land use policy for the site is Residential. The proposal will not alter the land use policy for the site.</p> <p>The importance of the Deakin/Forrest Residential Area Precinct stems from its frontage to the Main Avenue of State Circle and close proximity and relationship to Parliament House, its location within the Griffins’ land axis, and as an example of twentieth century ‘Garden City’ planning concepts that the Griffins’ adopted in their design for Canberra.</p> <p>The NCA’s ‘Issues and Policy Response Paper’ formed the first part of the NCA’s investigation into the Deakin/Forrest Precinct, to ascertain whether current planning and design controls within the National Capital Plan (NCP) were adequate to maintain the ‘Garden City’ and ‘City Beautiful’ concepts on which the area is based. The NCA</p>



Submission	Comment/Issue	NCA Response
		<p>determined that greater emphasis and clarification was required with regard to the landscape and sustainability policies within the NCP, therefore the NCA prepared Landscape and Sustainability Guidelines (the Guidelines), July 2018. The Guidelines are advisory only and aim to support existing objectives and policies of the NCP to preserve the Garden City character of the Precinct. The NCP and the Guidelines for the Precinct do not place a limit on the quantity of dwellings per block, however future development, including single dwelling proposals, will need to comply with specific requirements outlined in the Guidelines. This proposal complies with the specific requirements outlined in the Guidelines and also the relevant provisions of the National Capital Plan.</p> <p>The NCA considers that the proposal for three dwellings on the block allows sufficient space for landscaped areas, maintaining and enhancing the City Beautiful and Garden City concepts and character of the residential environment.</p> <p>Implementation of policies outlined in the NCP and the Guidelines naturally limit the built and hardscape environment in order to protect the Garden City and City Beautiful character of the Precinct.</p> <p>Griffin’s garden city concept refers to the geometric street layout of Main Avenues down to residential streets with dedicated margins for road reserves (the verge/nature strip). Wide city streets, grandly scaled rows of broad canopy trees, and the absence of front fences underpins Griffin’s vision and is included in the NCP.</p> <p>Part 4.5.3 of the NCP states the following objectives for Deakin/Forrest residential area precinct:</p> <ol style="list-style-type: none"> <li>1. The residential areas of Deakin and Forrest that lie between State Circle and National Circuit will maintain and enhance the character of the National Capital and will be planned and developed in accordance with its national significance.</li> <li>2. The principle residential character of the area and the use of the land primarily for residential purposes are to continue.</li> <li>3. Design of buildings in proximity to the Prime Minister’s Lodge must reflect the dominant urban design character of the locality.</li> </ol>

Submission	Comment/Issue	NCA Response
		<p>The 'Forrest Housing Precinct 1', 'Blandfordia 4 Precinct', 'Blandfordia 5 Precinct', and the 'Reid Housing Precinct' are listed places on the ACT Heritage Register. These places are significant for their Garden City planning philosophies and attributes, and will be preserved for their historic significance to the planning of Canberra and for tourists to enjoy.</p> <p>The subject site is located outside of the Blandfordia areas and heritage precincts of Forrest. The site is within close proximity to the City Centre, transport corridors (Adelaide Avenue, State Circle (potential future light rail route) and Canberra Avenue), and major employment and recreation hubs within Parkes, Barton, Kingston and Manuka.</p> <p>The Designated Deakin/Forrest precinct is a suitable place for redevelopment and urban intensification to reduce urban footprints, improve city sustainability and make better use of existing infrastructure, in accordance with Part 2.3 <i>Sustainability</i> and Part 3.3 <i>Urban Areas</i> of the National Capital Plan.</p> <p>The subject site has no heritage status. The landscape design included as part of the application aims to preserve and enhance the garden city character of the area providing formal landscaping to the Canterbury Crescent frontage and retention of large mature trees within the block. The verge and streetscape will not be impacted by the proposal.</p> <p>The National Capital Plan does not prohibit multi-unit development within the Deakin/Forrest Residential Area. Development is subject to consistency with the relevant design and siting provisions. The NCA's 'Issues and Policy Response Paper' formed the first part of the NCA's investigation into the Deakin/Forrest Precinct, to ascertain whether current planning and design controls within the National Capital Plan (NCP) were adequate to maintain the 'Garden City' and 'City Beautiful' concepts on which the area is based. The NCA determined that greater emphasis and clarification was required in regards to the landscape and sustainability policies within the NCP, therefore the NCA prepared <i>Landscape and Sustainability Guidelines</i> (the Guidelines), July 2018. The Guidelines are advisory only and aim to support existing objectives and policies of the NCP to preserve the Garden City character of the Precinct.</p>

Submission	Comment/Issue	NCA Response
		<p data-bbox="1144 233 2085 288">Respecting character does not mean preventing change and is not intended to result in replication of existing building stock. It does not mean mimicry or pattern book design.</p> <p data-bbox="1144 328 1581 352">Part 2.3 Sustainability of the NCP states:</p> <ul style="list-style-type: none"> <li data-bbox="1167 360 2040 416">a. Urban expansion should be contained so as to minimise impacts on valuable natural and rural areas.</li> <li data-bbox="1167 456 2085 552">b. A substantial portion of new development must be located within existing urban areas such as town centres and along public transport routes or other strategic sites that allow for efficient use of infrastructure.</li> </ul> <p data-bbox="1144 592 2085 807">The proposed site is located within an ‘Urban Area’ of the General Policy Plan – Metropolitan Canberra, as shown in Figure 2 of the NCP. The future shape and character of metropolitan Canberra (in particular, the role of the Central National Area in the growth of the city) are of major interest to the contemporary planning and development of the capital. Topical issues include the Garden City landscape character, economic and environmental sustainability, limited land supply, a changing demographic, and a growing demand for central city living.</p> <p data-bbox="1144 847 2085 1038">The Propositions and Strategic Initiatives of the Griffin Legacy provide a coherent framework for accommodating growth in the Central National Area. The Propositions complement the Canberra Spatial Plan, a planning policy document of the ACT Government, predicated on a population increase of 100–170,000 people within thirty years – requiring some 60-90,000 new dwellings. The Canberra Spatial Plan nominates residential intensification within a 7.5 kilometre radius from Central Canberra.</p> <p data-bbox="1144 1078 2051 1302">The Deakin/Forrest Residential Precinct is located close to major employment areas, the city, and major transport routes (the subject site is located approximately 3.8km from the City Centre). Current approaches to urban planning suggest that such locations should be utilised for higher density development to help reduce urban footprints, improve city sustainability, and make better use of infrastructure. More compact cities can assist in containing the extent of infrastructure we build and maximise the number of people it serves, making it more cost and energy efficient.</p>

Submission	Comment/Issue	NCA Response
		<p>The precinct also benefits from close proximity to restaurants, retail, cultural institutions and opportunities, and major recreation spaces such as Lake Burley Griffin and its parklands. Changes in population, demographics and lifestyle have resulted in demand for alternative dwelling forms that receive the benefits afforded by locations such as the Deakin/Forrest Residential Precinct, but do not consist of single house on a large block with extensive garden. Opportunity exists to offer a variety of dwelling types in the precinct.</p> <p>The street and immediate locality contain a diversity of building scale and development types. The NCA considers that the proposal is of high quality and will not have a detrimental impact on the precinct.</p>
2.2	<p>This is close to the Lodge and Parliament. It signals the start of ever increasing density and height of residential buildings. Does the NCA really, eventually, want our Parliament House surrounded by high rise apartment blocks? I therefore believe the application should be rejected.</p>	<p>The NCP and the Guidelines for the Precinct do not place a limit on the quantity of dwellings per block, however future development, including single dwelling proposals, will need to comply with specific requirements outlined in the Guidelines. This proposal complies with the specific requirements outlined in the Guidelines and also the relevant provisions of the National Capital Plan.</p> <p>Part 4.1 – The Central National Area of the National Capital Plan aims to revitalise the Griffin vision by accommodating growth to contribute to a compact, sustainable city that fosters a healthy community and offers: increased housing, employment and recreation choices, ease of movement, integrated transport and land-use; and respect for the natural environment.</p> <p>With regard to the notion of ‘high rise apartment blocks’, Part 4.5.5 Deakin/Forrest Residential Area Precinct Code allows development to be no more than two storeys and no more than eight metres above natural ground level. The proposal is only two storey in sections and is 7.2m high, 80cm under the allowed limit. For reference, please see 4.5 Deakin/Forrest Residential Area Precinct Code, in particular Figure 27, 28, 29, 30, 32 and 33 for indicative development plans for residential sites fronting State Circle between Hobart and Adelaide Avenues.</p>

Submission	Comment/Issue	NCA Response
<b>3.</b>	<b>Ms Pam Nielson</b>	
3.1	<p>As a former resident of 20 years in 'old Deakin' at 14 Robe Street I fully applaud the upgrading and updating of houses in this area. 14 Robe Street was an Oliphant designed cottage for Mr Green the then Head of Forestry in Canberra. The cottage was charming but heating and hot water provision was no longer a tenable option. I believe that the area was enhanced by this and the modernisation of other dwellings in Robe Street without losing the original character of the area.</p> <p>I have looked at the drawings and associated documents for the redevelopment at 10 Canterbury Crescent and find it to be a very sympathetic development which can only add to the amenity of the area.</p> <p>The extensive retention of old garden features available to each of the proposed dwellings makes for a charming environment which would be enjoyed by three separate occupants. Given the size of the block, I fear that the alternative of one dwelling being erected on the site would lead to an overlarge house not at all in keeping with the area and, in addition, available to one group only rather than three.</p>	Noted.
<b>4.</b>	<b>Mr James French</b>	
4.1	<p>I am writing to express concern regarding the proposed multi-townhouse development application at 10 Canterbury Crescent Curtin. The proposed development is out of keeping with the character of Canterbury Crescent and the Deakin-Forrest Residential Precinct heritage area.</p> <p>Every residence on Canterbury Crescent is a single dwelling apart from one duplex on the corner of National Circuit. The street is a very quiet and peaceful residential area which does not have the infrastructure capacity to manage a tripling of residents.</p>	The architectural vernacular of Canterbury Crescent is varied ranging from the Cambodian and Myanmar embassies to modern housing other than a detached dwelling at 19 Canterbury Crescent. There are multi-unit dwellings on the surrounding State Circle, Melbourne Avenue and Daly Street. Ample landscaping has been provided on the front boundary and sufficient setbacks have been proposed. This proposal is not discordant with the site or general amenity of the locality in terms of design, colours, finishes and materials.

Submission	Comment/Issue	NCA Response
		<p>10 Canterbury Crescent is not listed on or nominated for any Heritage list (aqua square shows subject block and the red hatching shows nearby Heritage area) – accessed on ACTmapi 23 March 2020.</p>
4.2	<p>Retaining the nationally significant heritage characteristics of the residential precinct requires a coherent plan and oversight of regulation by the Commonwealth parliament in order that short term profiteering by developers does not cause a permanent loss. With this in mind, it is imperative that the NCA should formulate a plan which specifies limits on subdivisions of residential blocks (eg no more than 1 residence per 1000m) and seeks parliamentary approval for any intensification of development within the nationally significant Deakin/Forrest precinct. Intensification of development is inappropriate and undesirable to the vast majority of local residents, as previously shown by responses to the draft 89A. An insufficiently regulated piecemeal approach benefits only the developers, to the detriment of us all.</p>	See response to 2.1 above.
5.	Mr James Koundouris	
5.1	<p>We make the following comments in regards to the proposed development on the Development Application for 10 Canterbury Crescent, Deakin.</p> <p>Front setbacks need to be in keeping with the existing home. How can the character of the area continue if there is substantial change in the setback of the streetscape. No consideration has been given to the existing set back of the existing home.</p>	<p>The proposal complies with the <i>Conditions for buildings other than detached houses</i> regarding the performance and quantitative standards for front setbacks. The proposal has a front setback of 6 metres (in relation to the one storey section) and 7.5 metres (in relation to the two storey section).</p>



Submission	Comment/Issue	NCA Response
5.2	<p>The above application proposes three homes which are on a 1769sqm2 i.e.: One dwelling per 589sqm. The existing character of the area, as defined by the NCA in their 'Issues and Policy Response Paper' dated April 2017 on page 6 under clause 1.2 states; the majority of blocks have a single dwelling. This is proposal is there for not in keeping with the character of the area. The NCA also (on the same page), makes the comment that residential blocks are typically large, ranging in size from 1050m2 to 3,832m2. We believe that this is fundamental to the character of the area. This assertion is also supported in the Martin report. We also draw your attention to recent Land and Environment Court decisions including <i>Sterling Projects Pty Ltd v The Hills Shire Council [2011] NSWLEC 1020</i> where the Commissioner said in its consideration of compatibility with neighbouring character:</p> <p style="padding-left: 40px;">a. Character is not limited to a consideration of streetscape but includes the wider context of the site, in particular the characteristics of the properties which adjoin the site (predominantly detached homes on large allotments).</p> <p style="padding-left: 40px;">b. The length of the proposal (including its intrusion into a green zone) is uncharacteristic of the area</p> <p>Our assertion is that the character of the area includes all planning principals not just the front streetscape e.g. built form, number of dwellings per block size, driveways, canopy setback, landscaping, proximity and impact on neighbours to the rear and side. The case above is just one of many we could point to in terms of the way the word character should be considered in assessing applications. The existing proposal has 12 facades.</p>	<p>See response to 2.1 above.</p> <p>With regard to the legal decision in <i>Sterling Projects Pty Ltd v The Hills Shire Council [2011] NSWLEC 1020</i>, the NCA distinguishes this matter on its facts for the following reasons:</p> <ul style="list-style-type: none"> <li>- The matter involved an appeal against a refusal of a development application for four townhouses on a site of 790m<sup>2</sup>. This proposal is a development of three townhouses on a site of 1769m<sup>2</sup></li> <li>- The matter turned on whether Clause 15 of the SEPP (Affordable Rental Housing) 2009 was satisfied, which provided that the provisions of the Seniors Living Policy Urban Design Guidelines must be met. The NCA's statutory framework has no such instrument or obligations.</li> <li>- Commissioner Tuor considered 'character' when deciding whether Clause 15 was met or not and stated that character is not limited to a consideration of streetscape and includes the wider context of the site. In the subject proposal, the wider context includes the neighbouring streets of State Circle, Melbourne Avenue and Daly Street which all have buildings other than detached dwellings and a varied architectural vernacular.</li> <li>- 'Intrusions into Green Zones' and 'lengths' are terms particular to NSW planning laws and are not applicable to the National Capital Plan.</li> </ul>

Submission	Comment/Issue	NCA Response
5.3	The soft landscaping calculation is incorrect and does not comply with the definition on page 5 of the landscape and sustainability guidelines documents. Further, the 40% is a minimum noting that the existing character of the area substantially exceeds 40%.	The soft landscaping calculation is correct and complies with the 40% soft landscaping requirement. There is 733.78m <sup>2</sup> (41.6%) of soft landscaping.
5.4	There has been no meaningful consultation with residents in the area. This does not accord NCA's commitment to community engagement document in particular clause 2. Consultation.	The NCA has complied with its <i>Commitment to Community Engagement Guidelines</i> . Public consultation for this proposal took the form of: <ul style="list-style-type: none"> <li>• On Saturday 22 February 2020, the NCA published a public notice in <i>The Canberra Times</i> detailing the proposed works and inviting submissions to be made to the NCA in relation to the proposal (Attachment A).</li> <li>• Between 21 February 2020 and Friday, 13 March 2020, the NCA published the proposal and plans on the NCA's website.</li> <li>• On 21 February 2020, one A1 size sign was placed on the subject site. It was removed on 13 March 2020 (Attachment A).</li> <li>• On 21 February 2020 the NCA wrote to key stakeholders and community groups via email advising of the consultation process and inviting comments.</li> <li>• On 21 February 2020, the NCA sent hard copy letters to all adjoining and near-by neighbours advising of the consultation process and inviting comments.</li> </ul>
5.5	There is no 2m tree root protection zone. The roots of this tree will get damaged and this significant tree will die.	It is unclear which tree is being referenced, however the NCA will require the applicant to submit a Tree Protection Plan before works commence.
5.6	There is no traffic impact report. There has been no consideration given to higher density developments in the area and what effect this will have on parking, traffic, etc.	The proposal is for three residential dwellings and is not of a significant scale to warrant a safety audit report. The proposal meets the parking requirements outlined in the Design and Siting Code of the National Capital Plan. Front and reversing vehicular movements may be made in the existing driveway.
5.7	The overshadowing diagram confirms there is overshadowing which is not in keeping with the standard.	There is no overshadowing diagram associated with this proposal. The proposal meets the provisions relating to setbacks. The NCA is satisfied that there will be <i>no</i> overshadowing and the privacy of neighbours will be maintained.



Submission	Comment/Issue	NCA Response
5.8	Any approvals in the area should include a Traffic Management plan during construction.	A traffic management plan will be prepared/contracted by the builder for construction and is subject to a future/separate works approval application.
5.9	Large existing tree is to be removed from the west boundary. It will open up the building to the lodge. Is this the outcome the NCA is looking for?	The large existing tree to the west was determined in an independent tree report to be dangerous and in ill health. The tree will be replaced by additional tree plantings. There are sufficient existing and proposed plantings on the Lodge boundary which will screen the development from the Lodge.
5.10	Car reversing out of unit 1 will potentially crash into the existing tree. Therefore another existing tree will need to be removed.	Front and reversing vehicular movements may be made safely in the existing driveway. The proposal must comply with relevant TCCS laws relating to driveways. The small scale of the proposal does not warrant a safety audit report.
5.11	Upper floor level in unit 1 is less than 7.5m from the rear boundary. The north east boundary	<p>The rear property setback is 7.5m from the building line to the property boundary. There is one section where eaves encroach into the 7.5m distance; however setbacks are measured from the building line to the property boundary, not the eaves.</p> <p>Additionally, <i>'The quantitative standards contained in these conditions are objective guides to the performance standards adopted by the National Capital Authority. Compliance with the quantitative standards will therefore not necessarily result in works approval unless the performance standards have, in the opinion of the NCA, also been achieved. On the other hand, works approval may be given under special circumstances when the performance standards can be achieved without complete compliance with the quantitative standards.</i> There is enough distance to provide for adequate light and ventilation to preserve privacy of neighbours. There is no overlooking/shadowing to neighbouring blocks due to the design of the east/west elevations. The NCA is satisfied that the performance standards in relation to rear boundaries have been met. The rear setbacks are <i>consistent</i> with the National Capital Plan.</p>
5.12	The garages are not included in the plot ratio. If this development was approved on this basis this alone would be an appealable point.	Garages are excluded from plot ratio calculations for buildings other than detached dwellings.

**Appendix B – General Definitions**  
**Gross Floor Area**

Submission	Comment/Issue	NCA Response
		<i>'In the case of commercial, multi-unit residential, industrial or business, building floor space does not include any areas used for elevator shafts or stairwells, fixed mechanical plant or car parking'.</i>
5.13	Tree nominated in the front yard on the south of driveway appears to have already been removed. ( from the aerial view provided by actmapi) Was this done with consent?	The tree in the front yard was considered to be dangerous and in ill health by an independent tree report. The owner sought approval from the ACT Government (not knowing they had to seek approval from the NCA) to have the tree removed two years ago. The ACT Government approval for that tree is attached to the submission. The owner is retrospectively seeking approval for the removal of this tree from the NCA, the relevant authority. The NCA agrees with the ACT Government's decision to approve the removal of the dangerous tree.
5.14	The setback to the park should be greater as if is left as 1.8 m then when the "as mentioned proposed multi story development " is designed they will also want 1.8m and 4 stories. Wouldn't a minimum 4-6 meter setback be appropriate?	There are no proposed multi-story developments proposed to the rear of the subject site – this is a mistake in the applicant's drawings. The NCA has received no such application. The subject site is not considered to be a corner block because it does not have "continuous frontage to a road" on the Lodge side boundary. The side set-back requirements are consistent with the National Capital Plan. The established plantings on the boundary edge will be retained and will largely screen the development from the park/Lodge.
5.15	From the NCP <i>"In relation to a detached house, the objectives of the policies are to provide for the residential amenity of the occupants of the house and the maintenance of amenity of adjoining houses and to ensure that an acceptable environmental quality is obtained in the neighbourhood."</i> Canterbury Crescent Deakin is over developed. Maintaining amenity of adjoining house has not been achieved.	The proposal is a <i>building other than a detached house</i> and provisions relating to detached houses do not apply. See response to point 2.1 regarding the maintenance of amenity in the area.
5.16	From the NCP <i>"Since Canberra's inception the garden city concept has been an integral part of residential environment. This has been achieved by an emphasis on the landscaping of streets and front gardens and upon the avoidance of structures in front of dwellings discordant with the suburban streetscape. These principles underlie the performance and quantitative standards which follow."</i> Canterbury Crescent Deakin has proposed structures in the front of the building with blade walls and extra-large eaves over hangs!	The proposal has ample front soft landscaping between the building line and the boundary. With regard to <i>Structures in front of buildings</i> , the provision states <b>'Generally, no structures are to be erected between the building line and the front property boundary'</b> . The NCA is of the opinion that the stone 'blade' wall erected between the building line and the property boundary provides architectural interest. Additionally, the large eaves and sustainable and provide architectural interest. Setbacks are measured from the <i>building line</i> to the property boundary, not from the eaves. See response to 5.11.

Submission	Comment/Issue	NCA Response
5.17	From the NCP <i>“One Storey buildings: The building line of a one storey building may be more than but not less than 6 metres from the front property boundary”</i> . Canterbury Crescent Deakin has 2 frontages, the one to the park should be considered as a special frontage and have a greater frontage set back than 1.8m, suggest a minimum of 4m even suggest 6m.	The subject site is <i>not</i> a corner block (see response to 5.14). The proposal’s side setbacks are <i>consistent</i> with the National Capital Plan.
5.18	From the NCP <i>“Corner Blocks: Each corner block will have two building lines. The building line in respect to the major frontage must be in accordance with one storey buildings and buildings of more than one storey above. The building line in respect to the minor frontage must be not less than 4.5metres in the case of one storey building and not less than 6 metres in the case of a two storey building.</i> See notes above about little setback to park.	See response to 5.17.
5.19	From the NCP: <i>Except where provided for below, no structure, including fences, car shelters or clothes hoists, but excluding lighting posts, letter boxes and retaining walls of a reasonable height will be permitted between a minimum building line and a front property boundary.</i> There are walls at the front of the house confirm that the above is not satisfied.	This provision applies to <i>Conditions for detached houses</i> of 4.19 Design and Siting General Code and not to this proposal because it is not a detached house. The relevant provision for <i>Conditions for buildings other than detached houses</i> is explained in the response in 5.16.
5.20	From the NCP: <i>Quantitative Standards: The min. distance between the rear wall of a single storey building and the rear property boundary must be 4 metres and the corresponding distance for a 2 storey building must be 7.5metres.</i> The rear property setback for the upper story is less than 7.5m	See response to 5.11 above.
5.21	From the NCP: <i>Plot Ratio: must not be greater than 0.40 for residential buildings other than detached houses, and 1.00 for commercial and industrial buildings, unless otherwise specifically provided for.</i> There is nothing that states garages are excluded from the plot ratio.	Garages are excluded from plot ratio calculations for buildings other than detached dwellings.  <b>Appendix B – General Definitions</b> <b>Gross Floor Area</b> <i>‘In the case of commercial, multi-unit residential, industrial or business, building floor space does not include any areas used for elevator shafts or stairwells, fixed mechanical plant or car parking’.</i>

Submission	Comment/Issue	NCA Response
5.22	From the NCP: <i>Residential building: Two spaces per dwelling unit if such unit is designed for family accommodation and one space per dwelling unit plus adequate space for visitor parking if such unit is designed for single accommodation.</i> No visitor parking provided for 3 units. Visitor carparks are required to be provided onsite. Surely the NCA is not promoting that visitor parking on all future development of the area be provided on the street?	The requirement states that two spaces per dwelling unit are required and that requirement has been met. There is ample street parking for visitors.
<b>6. Mr Dennis Martin</b>		
6.1	This submission covers the same points as submission 5.	See responses to submission 5.
<b>7. Mr Peter Jansen</b>		
7.1	I live in Canterbury Crescent in a dual occupancy property which we moved to some 13 years ago. Our biggest problem in moving within the area from Yarralumla was the lack of housing choice in the inner south of Canberra, we wanted a smaller block and an environmentally friendly home and garden. We did not want an apartment, like those on State Circle, without outdoor areas and garden but we did want a smaller block with some garden and some outdoor area. We had no choice but to settle with a 945M2 block which we were not happy about however it is 1/2 the size of our previous block. The proposal for 10 Canterbury Crescent helps fill the gap for diversity of housing choice as well as being sympathetic with the surrounding area. Ageing in place is often referred to as a desirable output however its realisation is sorely lacking. The State Circle units are a partial solution however do not offer the same sort of openness of outdoor and garden areas which the 10 Canterbury Crescent proposal will have. My information is that the Canterbury Crescent and Daly Place areas when first released for development is that diversity of style, character and design were strongly encouraged. The current DA proposal would continue that theme. I totally support the DA as it improves the local diversity because of its architectural merit, liveability, & environmental responsibility. Unfortunately the existing residence at 10 Canterbury Crescent does not	Noted.

Submission	Comment/Issue	NCA Response
	offer any of the aforementioned qualities with the opposite being the case, in my opinion.	
<b>8.</b>	<b>Mr Ian and Ms Gillian Graham</b>	
8.1	This submissions contains points 1-15 of submission 5.	See responses to submission 5.
<b>9.</b>	<b>Ms Stephanie Lourandis and Ms Lynne Cirulis</b>	
9.1	This submission contains the same points of submission 5.	See responses to submission 5.
<b>10.</b>	<b>Mr John Bell on behalf of the Deakin Residents Association (DRA)</b>	
10.1	I am writing to provide feedback on the proposal to redevelop this site. In the view of the Deakin Residents Association (DRA), the proposed development would not maintain the character of this residential area. In addition, the proposal is in breach of several provisions of the NCA's General Code – Conditions for buildings other than detached houses. The DRA's major problem with this proposal is that it would result in overdevelopment of the site. One of the reasons that the NCA was given responsibility for this area (and the adjacent area in Forrest) was because it was seen as an important part of Canberra's garden city concept. Proposals such as this one will destroy one of the key reasons for giving the NCA oversight of this area.	See response to 2.1 above.
10.2	The proposal claims to have a plot ratio of 0.4. It can only do this by excluding the above-ground garages. The NCA code appears to allow developers to use this loophole to cover more of the site than would be allowed in the rest of Deakin. Excluding the area of the garages might have been appropriate when there was a single dwelling on the larger blocks in	Garages are excluded from plot ratio calculations for buildings other than detached dwellings.  <b>Appendix B – General Definitions</b> <b>Gross Floor Area</b>

Submission	Comment/Issue	NCA Response
	Deakin/Forrest. However, in our view it is totally inappropriate when multiple dwellings cover the site, such as proposed here.	<i>'In the case of commercial, multi-unit residential, industrial or business, building floor space does not include any areas used for elevator shafts or stairwells, fixed mechanical plant or car parking'.</i>
10.3	The proposal does not meet the building line requirements (building line within the one storey setback of 6m). There are wall and roof encroachments forward of the building line. Further, in the view of the DRA, the site should be considered to be a corner block, in which case the proposal is non-compliant at only 1.8m off the boundary. There are also eave encroachments on the southern boundary and on the rear corner on the Unit 1 stairwell. The upper floor eaves extend well into the setback.	Setbacks: See response to 5.11 above.  The block is not considered to be a corner block. The Lodge park boundary does not have continuous frontage to a road.
10.4	In addition, the soft planting area {1769-(704+140+246+paths)} is less than the 40% required. These examples of breaches of the Code support our view that the proposal is over-development.	The soft landscaping calculation is correct and complies with the 40% soft landscaping requirement. There is 733.78m <sup>2</sup> (41.6%) of soft landscaping.
10.5	The DRA is also concerned at the loss of trees on development proposals such as this. This proposal has only very weak commitments to maintain vegetation around the boundaries. The canopy cover of 15% comes at a time when the ACT Government is setting a target of 30%. Proposals such as this fail to help meet that target. The DRA notes that the NCA issues paper 'Our Trees' outlines robust tree protection measures that incorporate Australian Standards AS4970-2009 Protection of Trees on Development Sites. AS4970 requires a Preliminary Arboricultural Report and an Arboricultural Impact Assessment Report. Where are these reports?	The proposal maintains the vegetation of the Lodge side boundary but for one tree which was deemed to be dangerous and in ill health by an independent arborist report. There are ample replacement tree plantings (25% canopy coverage) to mitigate this loss which exceeds the 15% requirement. They include 10 new canopy trees (crown spread min. 8m). The proponent cannot remove soft landscaping outside the block boundary, and there is significant existing soft landscaping on the front and Lodge side boundaries which will screen the dwellings.  The NCA's Tree Management Policy covers National Land owned and managed by the NCA. The subject block is located within an NCA Designated Area, however it is not National Land, it is Leased Territory Land. The NCA's Tree Management Policy does not apply to this block, the NCA's Landscape and Sustainability Guidelines apply.  There are two arborist reports and one ACT Government approval for tree removal attached to this proposal. All trees were deemed to be dangerous and in ill health. There is ample tree replacement as discussed above to mitigate this loss.

Submission	Comment/Issue	NCA Response
10.6	The DRA is sympathetic to the owners' desire to age-in-place, but this should not be achieved at the expense of the character of the area. It is also very likely that when the current owner moves, any new occupants will no longer be 'ageing-in-place.' The development should be treated with this in mind. The DRA is not opposed, in principle, to redevelopments involving more than one dwelling. However, in the view of the DRA, if the NCA were to approve this proposal it would be a dereliction of NCA's responsibilities. If it is approved, the DRA will join other community groups in seeking to have the Deakin/Forrest zone removed from the responsibility of the NCA.	See response to 2.1 above.
<b>11.</b>	<b>Ms Karen Fogarty</b>	
11.1	The development is out of character with the current streetscape and the current houses in Canterbury Crescent, National Circuit and Daly Crescent. This is a quiet, narrow suburban street without footpaths and it is currently used by its residents and of the neighbouring areas for daily walking, bike riding and car movements;	See response to 2.1 above.
11.2	The increased traffic movements associated by increasing the single dwelling to three dwellings is contrary to the Garden City planning principles. Increased safety issues with increased traffic movement. Increased parking problems.	See response to 2.1 above.  The proponent must comply with relevant Traffic and Building Code laws. The proposal is consistent with the car parking provisions of the National Capital Plan and provides two spaces per dwelling. The proposal utilises the existing driveway where safe vehicular movements may be made. The proposal is of small scale and does not warrant a safety audit report.
11.3	The density of the development with associated hard surfaces for car accesses;	The proposal has a plot ratio no greater than 0.4 which is consistent with the National Capital Plan.
11.4	The plot ratio of 0.4 is achieved by excluding the enclosed double garage from the calculation	Garages are excluded from plot ratio calculations for buildings other than detached dwellings.  <b>Appendix B – General Definitions</b> <b>Gross Floor Area</b> <i>'In the case of commercial, multi-unit residential, industrial or business, building floor space does not include any areas used for elevator shafts or stairwells, fixed mechanical plant or car parking'.</i>

Submission	Comment/Issue	NCA Response
11.5	The increased density in this small area is incompatible with the planning requirements for the remainder of the ACT;	See response to 2.1 above. The subject site is within a Designated Area is consistent with the National Capital Plan, the relevant planning legislation for the area.
11.6	The foreshadowed precedent of approval of similar projects in the Deakin precedent if this is approved.	All applications for works approval are assessed against the National Capital Plan and the Landscape and Sustainability Guidelines on a case by case basis, including consideration of site constraints, streetscape, landscape setting, neighbourhood amenity, road networks and excellence in urban design.
<b>12. Mr Greg Stretton</b>		
12.1	<p>Consistency with Planning Guidelines should require high density development primarily in areas around shopping centres and not in residential streets.</p> <p>Canterbury Crescent is a residential street, not suitable for multi-unit development. It is nationally and culturally significant with the Lodge, the Prime Minister's official Canberra residence, located between Canterbury Crescent and Adelaide Avenue. Canterbury Crescent is the access road for visitors and dignitaries visiting the Lodge as well as the security patrols which provide its protection.</p>	See response to 2.1 above.
12.2	The proposed development has a 3 double garages and is located on a right-hand bend in the roadway. Multiple cars backing out onto Canterbury Crescent at this point are a major traffic hazard and will impede the flow of visitors and the security patrols protecting the Lodge.	<p>The applicant must comply with relevant Traffic and Building Code laws. The proposed driveway is the same as the existing driveway. Cars will be able to safely turn within the block enabling a front vehicle movement to exit. The proposal is of small scale and does not warrant a safety audit report. The advice from Transport Canberra and City Services (TCCS) is:</p> <p><i>As per TCCS Municipal Infrastructure Standard (MIS 07 Clause 1.1.4) driveway access which services less than 4 dwellings or Units is classified as residential driveway category. Driveway access which services 4 and more dwellings or Units are classified as industrial driveway category. Design acceptance is required only for the industrial driveways from TCCS. Since the number of units in this situation is less than 4 (3 in the particular development), whoever approves the associated building within the block (Certifier/NCA) should confirm that the driveway is constructed to TCCS standards.</i></p> <p>Prime Minister and Cabinet are the custodians of the Lodge. They have been consulted regarding the proposal and they have no objections.</p>



Submission	Comment/Issue	NCA Response
12.3	<p>If the proposed development is allowed there will be a domino effect which will exacerbate the problems referred to above. The owners of 8 Canterbury Crescent have stated their intention of developing their block with multiple residences if the project proposed for 10 Canterbury Crescent is allowed to proceed.</p> <p>Refusal of the proposed development will have the advantage of preserving the streetscape and the amenity of the area. It should not be allowed.</p>	See response to 12.1
<b>13.</b>	<b>Mr Aleksander and Mrs Mojgan Miladinovic</b>	
13.1	<p>Identified as 'Designated Area' within the Deakin/Forrest precinct as defined by the National Capital Authority's (NCA) National Capital Plan (NCP), we believe the proposal is not reflective nor sensitive to this nationally significant area.</p> <p>Whilst we would not object to two dwellings being developed due to the block size allowing for this without it appearing distasteful, the increase to three provides greater issues, mainly due to the parking and traffic implications associated with a larger multi-unit development. Our objections and concerns are outlined below:</p> <ul style="list-style-type: none"> <li>- The proposed development is out of character with the current street scape and the current homes located on Canterbury Crescent;</li> </ul>	See response to 2.1 above.
13.2	The increased traffic movements associated by increasing the single dwelling to three dwellings will negatively impact the street traffic flow and create an eye-sore due to additional demand for street parking;	The applicant must comply with relevant Traffic and Building Code laws. The proposal complies with the parking requirement in the National Capital Plan of two off-street car spaces per dwelling. A traffic management plan will be prepared/contracted by the builder for construction and is subject to a future/separate works approval application. Front and reversing vehicular movements may be made safely in the existing driveway which is not proposed to be changed.
13.3	<p>As the property is directly opposite our home, and as we'll soon have three children under the age of three years old, there are increased safety issues with increased traffic movements;</p> <p>There would be on-flow increased parking problems for the narrow street;</p>	<p>The NCA does not consider a safety audit report would be warranted for this type and scale of residential development.</p> <p>The advice from Transport Canberra and City Services (TCCS) is:  <i>As per TCCS Municipal Infrastructure Standard (MIS 07 Clause 1.1.4) driveway access which services less than 4 dwellings or Units is classified as residential driveway category. Driveway access which services 4 and more dwellings or Units are classified as industrial driveway category. Design acceptance is</i></p>

Submission	Comment/Issue	NCA Response
		<p data-bbox="1189 229 2054 352"><i>required only for the industrial driveways from TCCS. Since the number of units in this situation is less than 4 (3 in the particular development), whoever approves the associated building within the block (Certifier/NCA) should confirm that the driveway is constructed to TCCS standard.</i></p> <p data-bbox="1151 395 1765 422">The applicant must comply with TCCS building standards.</p> <p data-bbox="1151 466 2018 518">The proposal is consistent with parking requirements as outlined in the National Capital Plan.</p>
13.4	<p data-bbox="302 528 1122 715">The Proposal does not adequately address the effect of the street scape in size or amenity. Currently, the proposal accommodates onsite parking for six cars accessed by a single driveway. There is no additional on-site parking other than that provided by the double garage for each unit. As a result, there will be a higher demand for the residents of the three units as well as their respective visitors to park on the street.</p> <p data-bbox="302 724 1122 1209">Though there is currently 2 hour on-site parking allowed on the left-hand side of Canterbury Crescent, this is generally only utilised during parliamentary sitting days. On these days, most of the parking on that side of the street is fully utilised and already presents a serious safety issue for residents as it is difficult for two-way traffic to operate safely on Canterbury Crescent. With the proposed development, this will likely be a daily occurrence rather than an event-driven situation. Constant parking at the front of our property will also affect vehicle reversing sight-lines, making it difficult to safely reverse as we will be impacted by parked cars and competing with increased traffic on a very narrow street. Considering we are also located on a corner, this will be made even more challenging given we won't be able to see cars turning the corner. Our neighbours who also reside to our right and opposite this proposed development will also be negatively impacted both by this proposal as well as the upcoming application next to it.</p> <p data-bbox="302 1219 1122 1369">The erosion of the ideal single dwelling residence or two dwellings for larger blocks, would reduce the area to a multi-unit development, with smaller gardens, hard surfaces and not be suitable for families. If this proposal is approved for three units and taking into consideration that the property next to 10 Canterbury Crescent has similar development plans,</p>	See response to 13.1-13.3

Submission	Comment/Issue	NCA Response
	<p>there will be a precedent set for similar developments throughout the precinct and the street. The lack of safety, amenity, increase of traffic movements and parking will negatively impact other home owners on the street and will encourage them to either redevelop themselves given their large block sizes, or alternatively on-sell it to other developers.</p> <p>Given the property is within close proximity of 'The Lodge', the Australian Prime Minister's property, there should be special considerations made for the standard of any multi-unit development within this area. If any 'garden city' ideals should be enforced in the Nation's Capital, it should be within close proximity of The Lodge given it hosts national and international delegates.</p> <p>The damage to the precinct if this development is approved will be irreversible and its negative impacts long-lasting. We ask that you consider our objections as outlined above and protect the interest of the precinct and this significantly important street in the heart of the Nation's Capital.</p>	
14.	<b>Ms Moira Smythe on behalf of the Forrest Residents Group</b>	
14.1	<p>Forrest Residents Group (FRG) welcomes the opportunity to comment on the above Works Approval (WA) application within the NCA's Deakin/Forrest Residential Area Precinct. We regard the proposed redevelopment replacing a single dwelling with three houses, albeit on a large block, as totally inappropriate for this special area. As specified in the Deakin/Forrest Residential Area Precinct Code (the Code), the NCA is mandated to "maintain and enhance the character of the National Capital" and ensure that "development surrounding, and in close proximity to, Parliament House is of the highest design quality". The Code, Section 4.5.2, points to the area's close proximity to Parliament House, its location within the Griffins' land axis, and its importance as an example of the twentieth century 'Garden City' planning concepts the Griffins adopted in their design for Canberra. It is further specified in the both the Code and the Landscape and Sustainability Guidelines, Deakin/Forrest Residential Area, that "buildings in proximity to the Prime Minister's Lodge must reflect the dominant urban design character of the locality". 10 Canterbury Crescent is located on the border of the parkland surrounding The Lodge, beside the Japanese cherry trees, a gift of the Japanese Government to mark the opening of new Parliament House.</p>	<p>See response to 2.1 above.</p> <p>See response to submission 5 above (Mr. James Koundouris' submission).</p>

Submission	Comment/Issue	NCA Response
	<p>There are few properties in closer proximity to The Lodge. It is visible from The Lodge's windows in a tranquil, serene area of open space and sunlight. The dominant urban character of this area is clearly single houses on large blocks. The Deakin area of the Precinct, State Circle excepted, consists of 34 properties, all but two of them single houses on large blocks. Only five properties have been redeveloped since first built and three of them are single dwellings. Two are dual occupancies, one located inconspicuously in Daly Street and the other, built in the 1980s on the corner of National Circuit and Canterbury Crescent, has one house facing each street so each appears as a single residence. The area's buildings, old and new, are predominantly of high quality although a few are showing their age. Apart from the aforementioned dual occupancy on the corner of National Circuit, Canterbury Crescent consists entirely of single dwellings. They include the embassies of Cambodia and Myanmar, the Myanmar ambassador's residence, and Malcolm Fraser's private residence in Canberra before he became Prime Minister. It is not a suitable area for multiple occupancies. The NCA has no mandate to assist property owners 'in optimising their financial position' under an Ageing in Place agenda as described in the Planning Report section of this WA. In the last six months there have been three WAs for multiple occupancies in the Deakin/Forrest precinct. The Code has no specific guidelines for multiple occupancies other than the apartment blocks on State Circle. Our experience in following the progress of a multiple occupancy proposal for 12 Hobart Avenue, Forrest, has been that NCA officers are focused primarily on its compliance with required specifications and reluctant to consider the overall nature of the redevelopment, its impact on the character of the area or its detrimental effect on neighbours. The approval of any of these applications would create a deplorable precedent for further such developments. We understand an application will be lodged for four houses at 8 Canterbury Crescent if the 10 Canterbury Crescent proposal is approved. Given the potential profits to be made from multiple occupancy development, the character of this significant area of our national capital could very soon be destroyed. Many technical flaws and non-compliant factors in the proposed design for 10 Canterbury</p>	

Submission	Comment/Issue	NCA Response
	Crescent are identified in the submission from James Koundouris and others. FRG strongly supports this submission. However, we do not believe the correction of these faults would remedy the fundamental undesirability of such a development.	
15.	Ms Megan Dick	
15.1	I strongly oppose the proposal to replace an existing single dwelling with three two story dwellings at Block 14 Section 3 Deakin. It is not in keeping with the character of the area which everyone (including the architect) acknowledges is characterised by large blocks with a single dwelling. In very recent years, the single dwelling characteristic of the area has been eroded by the NCA's approval of multi-unit developments in a bid to increase density. Therefore, it is only in the last 8 years that the character of the area has changed to include multi-unit developments of the kind currently under consideration. This should not be allowed to continue otherwise there will be nothing remaining of the original character which was large blocks with a single dwelling. Unlike in the adjoining part of Forrest and Deakin which has ACT planning jurisdiction, where they have retained the single dwelling characteristic absolutely and the look and feel of those areas is so much more in keeping with how this area was planned.	See response to 2.1 above.
15.2	I believe that the calculations of the soft landscaping as meeting the 0.4 plot ratio are incorrect and need independent calculation to verify. The three residences and accompanying driveways and other hard landscaping take up far too much of the block, thereby removing the lovely nature of the area which is large, leafy gardens with large canopy trees.	<p>The soft landscaping calculations are correct and propose 41.6% coverage which exceeds the 40% requirement.</p> <p>The proposal provides for 25% tree canopy coverage which exceeds the 15% provision in the Landscape and Sustainability Guidelines for the Deakin/ Forrest Residential area.</p> <p>Tree Removal - Two arborist reports and one ACT Government approval for tree removal accompanied the proposal. All trees proposed for removal were deemed to be dangerous and in ill health. The arborist reports were published to the NCA's website as part of the consultation process. Sufficient replacement tree planting is proposed to mitigate the tree removal, including 10 new 'canopy' trees (crown spread min. 8m).</p>

Submission	Comment/Issue	NCA Response
15.3	Can you please stop the the degradation of the character of this small part of Forrest which has come about by the NCA continuing to approve multi-unit, higher density developments, eroding the garden characteristic of this area. Soon, this area will be so extremely different in character from the adjoining streets of Forrest and Deakin it will look completely incongruous. However, it appears that the NCA are committed to making this a higher density area, which is against its mandate which is to retain and enhance the area. There are several elements of the planned buildings which also do not comply with the NCA's landscape plan for the area including front setback, structures in front of the building, requirements for new canopy trees etc. Can you please halt the irreversible changes to the character of the area brought about by continuing to approve multi-unit developments, a trend which only started within the last decade? Once the lovely park-like, garden feel of the area is lost, it is gone forever!	<p>The proposal is <i>consistent</i> with <i>Buildings other than detached buildings</i> - Setback provisions.</p> <p>With regard to <i>Structures in front of buildings</i>, the provision states '<b>Generally, no structures are to be erected between the building line and the front property boundary</b>'. The NCA is of the opinion that the stone 'blade' wall erected between the building line and the property boundary provides architectural interest.</p> <p>See response 15.1-15.2</p>
16.	Mr Ian Grigg	
16.1	The setbacks to the proposed house are quite different from the existing house. More congested and not well aligned with neighbouring properties.	The setbacks are <i>consistent</i> with the National Capital Plan. The NCA is satisfied that the performance standards in relation to front, rear and side setbacks have been met. There is enough distance to provide for adequate light and ventilation to preserve privacy of neighbours.
16.2	3 proposed homes on the existing block are totally out of keeping with the area and with your earlier guidelines. it is an excessive over development request	See response to 2.1 above.
16.3	Large trees are to be removed which defoliate the area and reduce the ambience nature of the Griffin plan.	<p>The applicant proposes 41.6% soft landscaping coverage which exceeds the 40% requirement of the National Capital Plan.</p> <p>The proposal provides for 25% tree canopy coverage which is exceeds the 15% provision in the Landscape and Sustainability Guidelines for the Deakin/ Forrest Residential area.</p> <p>Tree Removal - Two arborist reports and one ACT Government approval for tree removal accompanied the proposal. All trees proposed for removal were deemed to be dangerous and in ill health. The arborist reports were published to the NCA's website</p>

Submission	Comment/Issue	NCA Response
		as part of the consultation process. Sufficient replacement tree planting is proposed to mitigate the tree removal, including 10 new 'canopy' trees (crown spread min. 8m).
16.4	<p>It is within the area and adjacent to Parliament house and ignores the intention to have –Under the Griffin plan – single house developments and gardens to establish a Garden City concept. This congested over development fails on all counts.</p> <p>I request that the NCA reject this development application because it is excessive in both size and inconsistency with the surrounding neighbourhood. And certainly with the Griffin Plan for this” designated “ area..</p>	See response to 2.1 above.
17.	Ms Glenys Kaufline	
17.1	<p>In respect to the Works Approval Application within the NCA’s Deakin/Forrest Residential Area Precinct, I consider the proposed redevelopment of three houses to replace a single house on a large block unacceptable in this specific area. The Deakin/Forrest Residential Area Precinct Code requires the NCA (the “Code”) to “maintain and enhance the character of the National Capital”. The NCA is required to ensure that the “development surrounding, and in close proximity to, Parliament House is of the highest design quality”. The Code and the Landscape and Sustainability Guidelines, Deakin/Forrest Residential Area specify that “the buildings in proximity to the Prime Minister’s Lodge must reflect the dominant urban design character of the locality”. The “dominant urban character of the locality” – in very close to the Prime Minister’s Lodge – is “single houses on large blocks”. This particular area is unsuitable for multiple occupancies.</p>	See response to 2.1 above.

