

Consultation Report

Works Approval No 100168

Blocks 4 and 5 Section 38 (30 Limestone Avenue) Campbell

Demolition of all existing buildings

April 2017

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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 (the Plan) 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.

On 16 December 2016 the NCA received a Works Approval application from Doma Group for the demolition of all existing buildings located at Blocks 4 and 5 Section 38 (30 Limestone Avenue) Campbell.

Public Consultation requirements

1.1 National Capital Plan

Under the Plan, 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.

None of these requirements are applicable to the Works Approval application. However public consultation was undertaken as the proposed demolition of all existing buildings prior to the completion of a concept plan for the site is a requirement of Development Control Plan (DCP) 16/01 for the site (Blocks 4 & 5 Section 38 Campbell).

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 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 will make an assessment of whether a proposal is consistent with the National Capital Plan and if it requires public consultation. 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 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 on the application as the proposal may have adverse impacts on public space, community amenity, environment, heritage and landscape values.

Summary of Public Consultation

2.1 The public consultation process

Public consultation was undertaken by the NCA between 4 and 27 March 2017 in the following manner:

- On Saturday 4 March 2017, publishing 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 4 and 27 March 2017, publishing details of the proposal on the NCA's website
- Between 6 and 27 March 2017, placing one A1 size sign on site (Attachment A)
- The NCA writing to adjoining lessees, neighbours and interested stakeholders advising of the consultation process and inviting comments.

An article was published in the Canberra Times on 23 March 2017 outlining the proposal to demolish all existing buildings on the site development.

2.2 Submissions Received, Comments and Response

The NCA received a total of 16 submissions on the proposal. All submissions objected to the proposal to demolish the buildings. The names of individual objectors or name of the group objecting are detailed in the table below.

Public Submissions	Public Submissions	
Jack Kershaw	Petition with 45 signatures	
John Beales	National Trust of Australia (ACT)	
Matt Shepley	Christine Vincent	
Belinda Riethmiller	Josip Sladic	
Penleigh Boyd	Change.org online petition with 160+ signups	
Matt Bayliss	Friends of Grasslands	
Julie Bassett	Nancy Opdyke	
James Eldridge	Anonymous submission	

Emails of acknowledgment were sent to all submitters advising them that their submissions will be taken into consideration before a decision is made on the application. The key issues raised in public submissions and NCA response to those issues is detailed in the following section of the report. The full submissions are detailed in <u>Attachment B</u> of this report.

2.3 Key issues raised in public submissions and NCA response

A number of submitters raised similar issues and these are listed below along with a NCA response to each of the key issues raised. The key issues raised are listed:

- 1. Heritage significance and listing of buildings
- 2. Environmental (flora and fauna) significance and impacts
- 3. Potential for adaptive reuse of existing buildings
- 4. Future redevelopment of the site
- 5. Vehicular access and traffic issues
- 6. Incomplete planning and heritage reports accompanying application
- 7. Demolition is contrary to Crown lease requirements
- 8. Demolition of buildings is contrary to Development Control Plan (DCP) 16/01

- 9. Changes should be made to the NCA policy and procedures so the NCA will represent and consult in the best interests of the Canberra community.
- 10. Concern regarding tree removal
- 11. Inadequate steps taken by development to prevent vandalism of buildings

1. Heritage significance and listing of buildings

Submitter issues

The vast majority of submissions raised concern regarding the demolition of the existing buildings due to the perceived heritage significance of the buildings that formally housed the Commonwealth Scientific and Industrial Research Organisation (CSIRO) Headquarters. Many submissions assert that the buildings should be retained and protected by a heritage listing.

NCA response

The existing buildings are not listed on either the Commonwealth Heritage List or ACT Heritage Register. As per the *supporting Reports and Studies* outlined in DCP 16/01 the application is accompanied by a Heritage Assessment by GML Heritage Pty Ltd. The Heritage Assessment has undertaken an assessment of the existing buildings against the ACT Heritage criteria of the *Heritage Act 2004* (ACT) with the report indicating that the buildings meet the threshold for listings against three criteria- for historic, representative characteristics, and associated values. In addition to requiring a heritage Assessment DCP 16/01 indicates that the heritage report should be provided to ACT Heritage Council for consideration. The heritage report has been provided to the ACT Heritage Council and comments had not been provided at the time of finalising this consultation report. In addition, on 31 March 2017 the Department of Environment and Energy informed the NCA that the Department had received an application for the emergency heritage listing of the buildings on Blocks 4 and 5 Section 38 (subject site).

The NCA is currently waiting commentary from the ACT Heritage Office and the outcome of the application for emergency heritage listing to the Department of Environment and Energy.

2. Environmental (flora and fauna) significance and impacts

Submitter issues

A number of submissions have indicated that the demolition of the existing buildings will have considerable environmental (flora and fauna) impacts on threatened and endangered species both within the subject site and surrounding lands.

NCA response

The provisions of the National Capital Plan and DCP 16/01 require consideration of the proposal with regards to the relevant provisions of the *Environmental Protection and Biodiversity Act 1999* (EPBC Act). As part of the assessment of the Works Approval application the NCA has referred the proposed works and supporting documentation to the Department of Environment and Energy (DoEE) for consideration and comments. On the 31 Mach 2017 the Director of Assessment (NSW, ACT) and Fuel Branch of the DoEE provided written advice to the NCA on the Works Approval application. This letter outlined that prior to lodgement of the current Works Approval on 11 April 2016 development of the site was determined to be a controlled action due to likely significant impacts on listed threatened species and communities (section 18 and 18A) and on the environment on Commonwealth land (sections 26 and 27A) of the EPBC Act. With regards to the proposed demolition of the existing buildings the DoEE stated "The Department considers that activities related to development of the site (including demolition of existing buildings) are part of the controlled action and requires assessment and a decision as to whether or not to approve the proposed action". The advice indicates that a decision on whether or not to approve the action has yet to be made and development of the site many not be undertaken before approval is granted

under the EPBC Act. The recommendation from the DoEE states that "any approval granted by the National Capital Authority, for demolition of existing buildings at the site, should make clear the requirements for separate approval of demolition activities under the EPBC Act."

The NCA and applicant have discussed the EPBC Act requirements regarding controlled actions on the site as outlined in the DoEE letter. The applicant has advised the NCA that they are working actively with the DoEE to satisfy all relevant provisions of the EPBC Act.

3. Adaptive reuse of buildings

Submitter issues

A number of submitters have expressed a desire for the existing buildings to be retained and repurposed as part of any redevelopment of the site. Also concern have been raised regarding the loss of embodied energy if the buildings are demolished this concern relates to environmental sustainability considerations.

NCA response

The applicant has asserted that adaptive reuse of the existing buildings (office use) is incompatible with the desired future land use (residential) stating the following "it has been concluded that the re-use would be costly, difficult to achieve and would not result in efficient floor plates, would lead to changes in the building facades and would compromise a better utilisation of the for a residential precinct." In addition the applicant has stated in the supporting documentation that all buildings have been subject to considerable vandalism since they were vacated by the CSIRO, this vandalism includes removal of the cooper roofing and internal damage.

The NCA is considering both the applicant justifications to demolish the existing buildings and the public submissions which seek to ensure the buildings are retained and repurposed as part of the sites redevelopment.

4. Redevelopment of site

Submitter issues

A number of submissions raised concerns regarding the potential redevelopment of the site. The concerns relate to the changes to the natural environment and potential impacts from anyl future land uses.

NCA response

This Works Approval application is seeking to demolish the existing buildings along with removal/redirect existing underground services, and removal of one tree adjacent to a high voltage line. Any future redevelopment of the site requires the approval of a concept plan and Works Approval application. The requirements of DCP 16/01 indicate that further public consultation will be undertaken for any concept plan (redevelopment) for the site. Accordingly, matters regarding the future redevelopment and land uses are not applicable to this Works Approval application.

5. Vehicular access and traffic issues

Submitter issues

An issue has been raised regarding the vehicular access and traffic from trucks associated with demolition of the existing buildings. Submitters have also raised concerns relating to traffic in association with redevelopment of the site.

NCA response

The application is accompanied by Authorisation of Temporary Traffic Management Plans approved by the Delegate of the roads and transport authority. The TTM specifies daily authorised times and locations of associated road signage. The NCA is considering this matter as part of the detailed assessment and will look to ensure that all vehicular access for trucks associated with demolition works do not unreasonably impact on surrounding residential uses and roadways.

6. Planning and heritage reports accompanying application are contradictory and inadequate

Submitter issues

A number of submitters have raised concerns regarding the accuracy and quality of both the planning and heritage assessment accompanying the Works Approval application.

NCA response

The NCA is aware of the conflicting information within each of the supporting reports and has sought to clarify and resolve these matters with the applicant.

7. Demolition is contrary to Crown lease requirements

Submitters issue

A submitter has indicated that the proposal to demolish the existing buildings is contrary to the current requirements of the lease.

NCA response

The NCA has referred the Works Approval application and supporting documentation to the Department of Finance for consideration. On 6 April 2017 written advice was provided by the Acting Assistant Secretary of Property and Legislation and Advice Branch within the Department of Finance. The written advice indicates that the Department of Finance does <u>not</u> support the proposal to demolish the existing buildings, on the ground that the proposed works conflicts with a number of provisions in DOMA's existing Crown Lease for the land. The advice also state that Finance will be able to reconsider its position once the following matters are satisfied:

- a. Detailed concept plan for the Land has been finalised (including the necessary public notification and consultation), as required by the DCP;
- All EPBC Act clearances have been obtained and any conditions that might be imposed by Environment to protect relevant environmental and heritage values have been reflected in any updated DCP for the Land; and
- c. Finance has received an application for the surrender and re-grant of the Crown Lease to address DOMA's proposed development and future use of the Land (subject to the successful completion of items (a) and (d) above).

The NCA notes the advice from the Department of Finance and will discuss these matters with the applicant. This is a significant outstanding matter and the NCA requires this to be resolved to be able to determine the application.

8. Demolition of buildings is contrary to DCP 16/01

Submitters issue

A number of submitters have indicated that the proposed demolition of existing buildings is contrary to the provisions of the DCP 16/01 which is applicable to the subject site.

NCA response

The NCA is considering both the applicants justification to demolish the existing buildings which are covered in **3.** Adaptive reuse of buildings and the public submissions which seek to ensure the buildings are retained and repurposed as part of the sites redevelopment. Once all key outstanding issues are addressed the NCA will be in a position to determine the appropriateness of demolishing the existing buildings.

9. NCA policies and procedures should be changed to better represent interests and consult with the Canberra community.

Submitters issue

A submission has raised concerns regarding the NCA policies and procedures not reflecting and representing the best interests of the Canberra community.

NCA response

The NCA has completed public consultation as per the requirements of the "NCA Commitment to Community Engagement" which is detailed in **2.1 The public consultation process** of this report. As outlined the future redevelopment of the site will be subject to a concept plan which includes the requirement for further public consultation.

10. Concerns regarding tree removal

Submitters issue

Objections have been raised regarding for the removal of existing trees from the site.

NCA response

The applicant has clarified the tree removal works indicating that the removal of one tree adjacent to a high voltage line is required to enable removal of the existing substation on the site and redirection of the high voltage line. The tree removal works were identified by ACTEW AGL as necessary to redirect the high voltage line around the existing buildings. The NCA will consider the proposal to remove one tree from the site once all key matters are addresses by the applicant. The applicant has also clarified that all other trees on the site will be retained and protected as part of this Works Approval application.

11. Inadequate step taken by the developer to prevent vandalism of buildings.

Submitters issue

A number of submitters have indicated that the developer has failed to take adequate steps to protect the buildings from vandalism.

NCA response

The applicant has indicated that both temporary perimeter fencing and on call security guards have been used to protect the vacant building from vandalism. The NCA is considering this matter as part of the detailed assessment of the Works Approval application.

Conclusion

The NCA's consultation process was carried out in accordance with the Plan and the NCA's 'Commitment to Community Engagement'. The NCA will take into consideration the issues raised by the various public submissions, and where relevant to planning these matters will be taken into account as part of the assessment process.

The Works Approval application is currently being assessed by the Development Assessment team and discussions are ongoing with the both the applicant and key stakeholders, regarding those matters raised during public and stakeholder consultation. Given the significant outstanding matters the NCA is currently not in a position to determine the application.

Attachment A

The Canberra Times Public Notice and Site Notice



WORKS APPROVAL

Open for Public Consultation Blocks 4 & 5 Section 38 Campbell (30 Limestone Avenue)

The National Capital Authority (NCA) has received an application for the demolition of all existing buildings only.

Future public consultation will be undertaken by the NCA in relation to the concept plan for the site and future development proposals, as required by the relevant Development Control Plan.



The NCA welcomes community feedback on this application by close of business Monday, 27 March 2017. The application can be viewed on the NCA's website and submissions can be made via email to worksapproval@natcap.gov.au or sent to GPO Box 373, Canberra ACT 2601.

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







Attachment B

Public submissions

Jack Kershaw

To the National Capital Authority, with a copy for parties who may be interested,

Re Works Approval Application for the proposed demolition of former CSIRO buildings on Blocks 4 and 5, Section 38, Campbell, being *National Land* close to major city avenues - at 30 Limestone Avenue near the axis of Ainslie Avenue.

(Attachment included.)

Retention of the existing buildings would seem to be a commendable and feasible option, given their national significance (CSIRO HQ, most of which were built in 1970), and that they are clearly fine examples of their architectural style ("Late 20th Century International Style"), in good condition. The main buildings were designed by the award-winning architects McConnel Smith and Johnson (now MSJ Group). Another building was added in the 1980's designed by the Department of Housing and Construction, in similar style. As a group of buildings, they are well laid out, and orientated, forming an interesting and cohesive arrangement, with a compositional focus provided by the iconic 5-storeyed Building 1 (by MSJ), the loftiest of the buildings, offering magnificent views of the Central National Area and beyond. Significant building interiors remain, exhibiting fine timber joinery.

However, the applicant's consultant's comprehensive "Heritage Assessment" accompanying the application falls short of a strong recommendation to retain the buildings, while the applicant's consultant's "Planning Report" recommends their demolition, citing (superficial, surely) vandalism damage. Haven't we lost enough such buildings in Canberra already? Referral of this application to ACT Heritage is apparently recommended by the NCA.

Neither report mentions "adaptive re-use". It is a common-sense redevelopment path, acknowledged by ICOMOS*, that doesn't necessarily rely on formal "heritage listing", while respecting the history and design qualities of the place. Adaptive re-use would seem to be quite appropriate, and economically feasible in this case, given that the buildings are clearly significant in the history of Canberra and the Nation, while being clearly structurally sound, and possessing suitable dimensions and proportions, horizontally and vertically, for a range of uses. Adaptive re-use would save most of the substantial embodied energy of the existing structures.

Adaptive re-uses that I'm sure would be economically viable, could include Hotel (with various suite types), Residential, and ancillary Commercial, in a range of formats offering unique user experiences in interesting surroundings. Such re-use offers interesting awareness of the place's history and style. The reused buildings could be supplemented by carefully planned and designed additional ones with similar uses, and suitable landscaping.

This is a common arrangement all over the world, and Canberra needs more of it.

Although the Planning Report (not-so-strangely) doesn't advise the RL (height above sea level) at the top of Building 1, it would appear, from the surveys and drawings provided, to be close to RL 617 metres, the height limit set by the NCA in its Development Control Pan for the subject site. A part of the existing plant room on top of Building 1 might penetrate the height limit, and then only by a relatively small amount, which could be removed down to RL 617, while still maintaining the (revised and upgraded) plant room functions for a suitable adaptive re-use.

Jack Kershaw FRAIA 5 Lovegrove Place Kambah ACT 2902 62310524 March 10, 2017

* International Council on Monuments and Sites.

P.S. On a related matter: The Commonwealth Infrastructure Department's current very detailed and excellent plan for a Brisbane-Sydney-Canberra-Melbourne High Speed Rail installation contains a tunnel through Mt Ainslie, a very sensible arrangement, enabling in- and out-train high speeds, quietness, and no adjacent land acquisitions. In the plan, the tunnel delivers the railway to a central Canberra City station location under lower Ainslie Avenue. In a recent public debate on the location of Canberra's HSR station with the Planning Manager of Canberra International Airport (a location for the station rejected, after exhaustive and wide-ranging analysis, by the Department in favour of an inner City one), I submitted a slight modification of the recommended location, that highlighted the "National Capital arrival experience" aspect, largely missing in the underground station location. Notably, this location is relatively close, and readily accessible to the airport. My submission relates to the site of the buildings in the subject Works Approval Application, and their possible uses. I attach my Power Point presentation used at the debate (which I won) for your consideration.

John Beales

Isn't it wonderful that a site that was the national headquarters for country's major scientific organisation is judged by the developer as "not appropriate for commercial use or a hotel, not for scientific research, but was "very appropriate for residential."

Also if the site is a safety risk and there are concerns about theft, would it not be a good idea to lock the security fence and close access, rather than removing the remaining copper and leaving the site open for further disturbance and safety risk?

Matt Shepley

I wish to make public comment on the proposed demolition of the old CSIRO buildings.

I support this demolition - with the caveat that the buildings are not replaced with buildings above the tree line. If that is the plan, then I do not support demolition; active re-use of the building should be pursued.

I have always felt that the CSIRO building was totally inappropriate for the site at the base of Mt Ainslie. Viewed from the city, the building is too tall and isolated, and starkly silhouetted against the Mt Ainslie reserve and the residential surrounds. It is also too tall in such proximity to the War Memorial. The Mt Ainslie side of Limestone and Fairbairn Aves should be low-level development only, in order to preserve the vista of Mt Ainslie and the dignity of the AWM.

I hope that media reports about the site redevelopment including mid rise apartments - up to 8 stories - are false. The site is inappropriate for any development above the tree line. 8 stories is taller than the existing buildings and will be a worse outcome than retaining the current building. The site should be returned to a residential setting below the tree line - perhaps with a mix of traditional houses and townhouses, and low-rise apartments.

This development is an opportunity to remove an eyesore from this important part of Canberra.

Thank you

Belinda Riethmiller

I realise I'm late to comment, but I'm a resident of the nearby Howe Cres and **very** against both the demolition of an historic landmark and the subsequent proposed development.

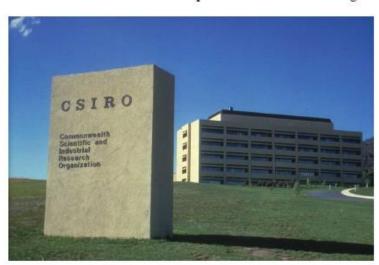
Penleigh Boyd

NCA - Blocks 4 and 5 Section 38 Campbell - Demolition of Existing Buildings

NATIONAL CAPITAL AUTHORITY BLOCKS 4 AND 5 SECTION 38 CAMPBELL WORKS APPROVAL - DEMOLITION OF EXISTING BUILDINGS PUBLIC CONSULTATION

WRITTEN SUBMISSION

This written submission objects to the proposed Demolition of Existing Buildings at Blocks 4 and 5 Section 38 Campbell - as described in the Works Approval documentation for Blocks 4 and 5 Section 38 Campbell - Demolition of Existing Buildings



Reasons for Objection:

1. From the NCA's website: "The mission of the National Capital Authority is to build the National Capital in the hearts of all Australians....(giving) Australians an opportunity to learn about the history of Canberra, and the unique and important role the city plays as our nation's capital."

The CSIRO main building (1970), pictured above, dates from Canberra's "glory days" when Canberra was supported and encouraged by federal government. It was, and still is, an imposing and grand building. With some imagination it could be re-purposed for current day use, such as luxury apartments. The developer should be asked to try harder.

The destruction of such a grand building does not fit with the NCA's mission of building "the National Capital in the hearts of all Australians". If the NCA continues to allow even further destruction of Canberra's historic fabric, Australians will come to believe that Canberra was all constructed in the 21st century. Good examples of the past, such as the CSIRO main building, need to be preserved for community benefit.

NCA Public Consultation Feedback

March 2017 - submission author: Penleigh Boyd

p.1

- 2. From an environmental perspective, it is extremely wasteful of embodied energy and materials to demolish all the buildings on the CSIRO site. The developer should be required to re-use at least the main building in any redevelopment.
- 3. It is surprising that part demolition of the main building has already commenced before NCA demolition approval has been granted. Are there NCA penalties for such action?

It is reported (Canberra Times 24 March) that the condition of the buildings had deteriorated since being vacant, with vandalism and lack of maintenance, broken windows, vermin access, water damage and the removal of shelving and furniture. Most of the copper roof of the conference centre had been stripped off. Most of the copper roof had been stolen from the smaller buildings, along with copper piping and the developer has since removed copper from the inside to deter further theft. If that is not demolition, by default, then what is?

The NCA must insist that developers secure, and suitably safeguard, property pending any works approval (even if demolition) so that the proponent cannot declare, for example, that the building is too far gone to save.

The NCA should enforce community expectations of probity in building ownership and not let owner neglect of their own building become an excuse for demolition.

The current neglected state of the building is no reason to demolish it. Repairs, now necessary due the developers own lack of care, would still be more cost effective than demolition and rebuilding anew.

4. The approved Development Control Plan for the CSIRO site, unde the previous owners, encouraged the retention of the existing buildings.

The CSIRO headquarters, built in 1970, and prominent at the foot of Mount Ainslie, were planned as a landmark. They were late 20th century international style, with a high level of integrity and typical of the style of McConnel, Smith and Johnson architects, using functional designs, simple geometric shapes and robust materials. They are a relatively intact example of the architects' work, with most of the other Canberra buildings by the same architect now demolished or changed. The approved DCP should be upheld, and strengthened, especially in regard to retention of the main 1970 CSIRO building.

Penleigh Boyd

Matt Bayless

As a resident of nearby Howe Crescent, I am opposed to this demolition and subsequent redevelopment of this site on the following grounds:

- The building itself has historical significance to me, and would hate to see a landmark destroyed for yet more apartments.
- The proposed height of the apartments is well above the height of the current CSIRO building, and would impact the view to and from Mount Ainslie.
- The demolition and construction process WILL impact endangered plant and wildlife, because of noise, ground vibration, some loss of habitat, and less sunlight because of increased building height.
- More people means more traffic, and Howe Crescent will be adversely affected. There will be more
 traffic down Quick Street, and Chisholm Street many commuters seem to prefer Chisholm Street
 because the traffic lights mean an easier time of getting onto Limestone Ave turning left onto
 Limestone from Quick during morning peak-time can be tricky. Also Chisholm is preferred for getting
 into the city centre as crossing Limestone at Quick Street is difficult of a morning.
 So, with increased traffic down both sides of Howe Crescent, it will be more difficult to join traffic on
 either end of my street.

Julie Bassett

I am writing to object to the demolition of the CSIRO building and most importantly the building of an 8 story 457 apartment building. It is far too close to Mt Ainslie and the War Memorial. It will be a visual blight on Mt Ainslie.

James Eldridge

SUBMISSION IN RELATION TO DEVELOPMENT OF BLOCK 4, SECTION 38 CAMPBELL, ACT.

My main concern with the proposed development is the large number of units proposed for the site (Block 4 Section 38). Does the development have to include so many units? Up to 457 units means a high density of people living on a relatively small site. If the adjacent site (Block 4 Section 63) is also developed for residential purposes, the number of people living on the two blocks, could be in the thousands. This would have a significant impact on surrounding roads due to increased traffic. The roundabout at the War Memorial end of Anzac Parade where it joins Limestone Avenue is already congested with poor traffic flows during peak hours. The suburban roads leading back into Ainslie towards the shops would also become more congested and dangerous for cars, cyclists and pedestrians, as well as Ainslie Avenue and other roads leading down to the city.

There would also be an impact on the environmental values of the site. Both Section 38 and Section 63 have some interesting rocky outcrops which provide homes and shelter for a range of wildlife, including echidnas, kangaroos and wallabies, and various reptiles and small mammals. Although the only endangered species identified in the area is the Golden Sun Moth, the increased number of people living and moving around on the site, will reduce the ecological value of the site.

Neighbouring apartment blocks between the proposed site and Civic have had major problems with drug and alcohol use and social dysfunction for many decades. There needs to be some consideration about how to avoid this new development degenerating in the same way.

Aesthetically an eight storey building (or more than one eight storey building), would be much more prominent than the existing five storey building which is tucked away behind trees and the rocky outcrops. Could the development be restricted to five stories to reduce its prominence and aesthetic impact on the surrounding suburbs and roads, and to retain the aesthetics of what already exists?

The GML heritage assessment notes that the buildings are not heritage listed or nominated but that they have heritage significance for their historic characteristics and associative values. It is disappointing that the site has already been sold with the understanding that the developer will demolish the buildings without any further consideration about whether they could or should have been heritage listed. Although they may not have been ideal to redevelop for apartments, aspects of the building could have been preserved, for example the conference hall or the bulk of building 1.

It seems odd and a pity that such a prime central site close to the War Memorial, the city, Mt Ainslie and the lake could not have been earmarked as a site for a building of national significance, rather than as an opportunity to make money from residential development.

Another concern I have with site redevelopment, is why the site was not secured between being vacated and demolished. The outcome is encouragement of vandalism and a black market trade in building materials and salvaged metals. While it is good that materials are being reused or recycled, it could be done in a more organized way.

Anonymous submission

22 March 2017

Application for Demolition

30 Limestone Avenue

Blocks 4&5 Campbell



As a concerned neighbour and long term resident of Canberra I am writing in response to the above application,

<u>Demolition Proposal</u>: The only justification for this proposal to proceed is that the buildings have deteriorated and they have been vandalised. The buildings were vacated a short time ago and from casual observation were left in secure, clean and working order. The owners have stripped the buildings, not secured the site and allowed the site/buildings to deteriorate.

The main fabric of the buildings appear to remain solid and in good condition yet the proposal does not indicate if any studies have been carried out to re-use the existing buildings as office accommodation or alternatively conversion to other accommodation options.

It appears that NCA has agreed to consideration of the demolition proposal as a permitted use under the existing purpose clause although I don't see any scientific merit in the proposed demolition

Environmental Issues: The buildings and site are significant and have been part of the Canberra landscape for nearly 50 years and do not pose any known current environmental problems. The buildings are substantial structures and if approved the demolition will generate a considerable environmental impact that has only been addressed in general terms in this proposal. The dust, noise, heavy vehicle traffic and duration of works will be substantial and will adversely impact on the Ainslie Hostel, the Campbell High School the residents in the area weekdays from 7am – 6pm.

The rubble from the demolition will create thousands of cubic metres of concrete and other rubble, yet there is only general information on how and where this material will be disposed and no information on the

environmental impact this will have. There does not appear to be any consideration for reuse of this material or reducing the environmental impact of the demolition and disposal of the rubble to zero.

A full environmental impact study addressing these and all others issues should be completed prior to consideration of the demolition approval.

<u>Traffic Issues</u>: The demolition proposal directs inbound trucks along Quick Street and along an informal track at the back of the site. This is not a legal access to Blocks 4 & 5 Campbell and the track is on Territory land. This track is not a designated road; it is not suitable for large heavy vehicles and should not be used as a legitimate access to Blocks 4&5. Quick Street and the access road to the Ainslie Hostel are also not built for heavy vehicular traffic like the number of truck movements required to remove the thousands of tons of demolished material.

A complete traffic survey should be provided on the traffic impact this proposal will have on the area, based on the number of truck movements per day for the duration of the proposal.

The proposal lacks significant information and raises serious environmental issues. Prior to consideration of a demolition proposal the whole site should be subject to a **Master Plan** that covers the total proposal for the future use of the site. This will enable the public and neighbours to have early input into a total proposal for the future use of this significant site. The current piecemeal approach starting with advertising the demolition of the buildings, in advance of any other documentation or information on the sites future use, is seen as development by stealth and will only result in token public consultation.

Signed petition with 45 signatures

PETITION

To the National Capital Authority and to the Speaker and Members of the ACT Legislative Assembly

This petition of residents of the Australian Capital Territory opposes the application that has been submitted to the National Capital Authority (NCA) for the demolition of all existing buildings on Block 4 and 5, Section 38 Campbell (30 Limestone Avenue).

The petitioners believe that more work is required to provide a suitable development that falls within the existing crown lease requirements and the conduct of the NCA's actioning of a Works Approval for demolition of this significant building being agreed to prior to the release of the Heritage & Environment Assessments is a breach of the requirements listed in the DCP. The original DCP approval had the main CSIRO HQ building being sensibly shown as repurposed. The current plan for demolition of the main CSIRO HQ building is not supported by the community

The unnecessary waste stream of the demolition with loss of embodied energy by demolishing a building that the Heritage study has shown to be significant, shows that NCA has made a poor decision issuing a Works Approval for its demolition. It is also an incredibly poor sustainability option supported and approved by the NCA. The demolition plan utilising Quick St is unacceptable, especially with Campbell High students in close proximity. The proposed 457 apartments and Health Club is an excessive development with major traffic issues stipulated and highlighted to the developers of the site as a major traffic congestion issue no less than by the original lessor the Commonwealth Department of Finance.

The proposed demolition of a significant Canberra building and the proposed excessive development will lead to degrading of the local environment and community amenity. The petitioners support a parliamentary review of the NCA's operations to facilitate changes to the policy and procedures of the NCA with the actioned outcome to provide proactive protection of the local environment and community amenity.

	NAME (please print)	ADDRESS	SIGNATURE
1	Leila West	12 Canning st, Ainslie	- Sweet
2	SHAVE WEST	12 CANNING ST AINSLIE	Angre West
3	Lakshmi West	12 Canning St, Anslie	10
4	PHIL THOMSON	10 CANDING ST AINSLIE	Phil Thomason
5	M. Kane-Lee	18 Canning St Ainslie	do.
6	(a) 156	B PANNING St. AINSLIK	1 Cleve
7	Cheoffren Simn	13 HAYLEY ST ANGLIE	aco
8	Henry Chang	2/17 HAY LEY ST A INSLIE	J-U
9	M. Neuthol	1 Winneaue & Anto	morelle
10	A Maher	GA HASCALL ST AINSLIE	The state of the s
11	Lina lee	9 winelle st, ainste	1 CM

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12 S.M. lliggn	15 Winnedle Street Ainslie	Shy!
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14 R. Cooper	17 Winnecke St Ainslie	134 00005
15 T. Shiel ub	25 Winnecke St Ainslie	TTTY
16 & ME COLLOCK	27 WINDERER 3T AINSLE	porefflore
17 HARRIS	26 WINNEGET ST AINSUC	
18 SACK PEZZEY	28 WINNEEDEST AINSLIE	Cyceszen
19 Adam Granguis		75000
20 Sue Kesteven	19 Couning St Assle	
21 Emily Smith	24 Canning St Ainstic.	Sulle
22 Ben Basser Sirk	22 Canning St Airslie	Wy /
ged Meller	16 Carring St Mislie	100
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26 Floring Walls	6 Canno St Austo	
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28 Ann Hade-	3 Quick St Ainslie	Quitane
29 tames Perry	10 Lowanna St Braddon	Rem
30 Sally Brades	12 8 Canning St Ainslie	
31 GREW SHALLOR	9 CANDING & ANGLE	That
32 Juhi Best	11 Canning St Arnshe	1915est
33 AARON MATPHENS	II CANNINGST AINSLIE	College
34 Gruham Smith	24 Canning st. Ainslie	
35 M DAVOREN	13 CANNING ST HINSLIE	
36 S. Parker	15 Carring St, Arishe	Parker
37 T /c/w	15 Canara St Annilie	7400
38 Sanny Dest	12 Canning St. Ainste	San M. Al
39 Patrick Barret	36 Canning & Anglie	But
40 Lachlan Parcons 41 TOPVOR LAMP	131 111	Taken land
12	35 CANNING ST AINSLIE	Stake County
43 Jan Keishaw	39 Canning St. Ainslie	
44 Z. DATCHIMA	2/14 Canning St Amiscis	A Latin
45 A. DATCHING	2117 Carnhaga MARLIA	- Tracel
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National Trust of Australia (Australian Capital Territory)

NATIONAL TRUST of AUSTRALIA (AUSTRALIAN CAPITAL TERRITORY)
ABN 50 797 949 955

27 March 2017

National Capital Authority GPO Box 373 CANBERRA ACT 2600

email: worksapproval@natcap.gov.au



NATIONAL TRUST

Unit 3.9, Level 3, Griffin Centre 20 Genge Street, Canberra ACT 2600

PO BOX 1144 CIVIC SQUARE ACT 2608

EMAIL: <u>info@nationaltrustact.org.au</u>
WEB: www.nationaltrustact.org.au

T: 02 6230 0533 F: 02 6230 0544

PATRON: The Hon Margaret Reid AO

CAMPBELL BLOCKS 4 AND 5 SECTION 38

Flora and Fauna

The initial public notification did not include all studies re flora and fauna values of the site and despite additional information being provided late in the consultation process there remains concern about adequate detail, assessment and what other information is still to be provided.

Demolition

We note the DA is for demolition, yet demolition has already started with the removal of copper and some equipment. This action needs to be prevented and unauthorised actions considered in assessing the Works Approval.

Significance

The GML Heritage Assessment Clause 3.2 clearly indicates that the site meets criteria a), d) and h) which is sufficient to include it on the Commonwealth Heritage List and/or the ACT Heritage Register. The significance is defined in Section 3.3.

Any action to demolish is contrary to protect he heritage values of the site and should not be permitted.

Purdon Report

The report is misleading as the EPBC Act is triggered (Clause 4.2) as the building has heritage value as identified in the GML Heritage Assessments.

The flora and fauna values also need further clarification and may also trigger a referral.

The comments in Section 6.2 are also misleading as the building has heritage value and there is no substantive discussion as to why they should be demolished and the impact on the heritage values if they were considered for demolition.

It is not logical that demolition of a building of significance will not adversely impact it heritage values.

Conclusion

The works approval for demolition cannot be supported given the heritage values of the building.

Penalties should apply as demolition has begun pre-approval.

Yours sincerely

Eric Martin AM

Chirstine Vincent

27 March 2017

Mr Andrew Connor
Development Assessment
NCA
worksapproval@natcap.govau

Dear Mr Connor,

Block 4 and 5 Section 38 Campbell Application from Doma Group for demolition of all existing buildings

I refer to your letter of 6 March advising that an application was submitted to the NCA for demolition of all existing buildings, and also reference the plans and supporting documentation on the NCA's website.

I note that your letter indicates that "responses received will be considered before a decision is made on the proposal". I would like to believe this is the case but any reading of the documentation, particularly the minutes of the meeting between NCA and Doma Group on 17 October 2016 suggests that the public are being asked to comment on a situation which is virtually a fait accompli. Yet again it is apparent that development consultations in the ACT are organised to benefit the owner/developers' requirements rather than the broader community. In this particular case I am concerned about what seems to be a lack of correct process and I submit the following comments.

1. Crown Lease

The Block 4 Section 38 Campbell lease was granted in June 2002 for a term of 90 years.

I refer to Purdon Planning's Urban Planning Report dated March 2017:

The lease purpose clause permits the "...use of premises for Scientific Research Establishment and any other purposes ancillary thereto"... and

'The proposed application for **demolition does not impact on the requirements of the crown lease**. Any future Works Application for redevelopment is likely to require a lease variation."

Clearly demolition of the buildings **does** impact on the requirements of the crown lease which purpose is for the "use of premises". If the premises are removed for whatever reason, it must be in contravention of the lease. Obviously any future development on the site is going to require a lease variation, but it should be done in the correct order with all due consultations required.

1.1 I submit that no demolition should proceed until a lease variation is approved.

2. State of buildings

In support of the application for demolition much is being made of the degraded state of the buildings, both in the Purdon Planning Report and 7.1 of the Minutes of meeting on 17 October where is it noted that "it is intended to undertake the demolition asap".

When the site was sold by Abacus to Doma Group in June 2016 the buildings were not vandalised as they are now even though they had been empty for some time. Doma Group has been negligent in maintaining the buildings and given their request to demolish, it was no doubt in their interests to let the

buildings deteriorate.

2.1 I submit that rather than using this as an excuse for demolition, the owners should be required to make good the buildings until such time as a DA for total redevelopment of the site is submitted, passed through the public consultation process and approval received.

3. DCP 16/01

It is significant that item 7.0 of the Minutes of 17 October state that "NCA noted that the DCP had a degree of flexibility to change and address new development requirements". DCP 16/01 was finalised less than a year ago, and is a broad ranging planning document so the need for change now begs the question as to what it is that the new owner is proposing that cannot be accommodated in the current DCP? Unfortunately the DCP does not require that the existing buildings be retained although it does state that "Adaptation and reuse of the existing CSIRO Headquarters buildings is encouraged". Far from reuse being encouraged, the NCA now appears to be encouraging demolition.

I thought a Development Control Plan was exactly that, a Control, but it seems it is more a Development Concept Plan which can be changed to suit the developer. It is very disappointing for those who have made an effort to contribute to the development of DCP 16/01 to see it being changed so willingly. Are there more issues other than those noted in 4.0 of the Minutes?

3.1 I submit that no Works Approval for demolition of any buildings on this site should proceed until there is public consultation on a Master Plan and proposed changes to the DCP.

I have not gone to the substantive issue of whether or not the existing buildings should be demolished because that would be addressed if due process as outlined above is followed.

I request that the three submissions herein be given careful consideration and I further request a response by the NCA to all public submissions before any demolition approval is granted.

Yours faithfully,

Christine Vincent

Josip Sladic

Dear Sir or Madam,

I would like to comment on the proposed demolition of the former CSIRO Headquarters on Limestone Avenue in Ainslie.

I was disappointed to hear that we will be losing yet another landmark building of heritage significance in such a prominent location to be replaced with inappropriate low quality high rise flats.

DOMA (Mr Domazet) has a track record of developing every inch of land right up to the boundary and even encroaching onto public space beyond the boundary.

Their buildings do not stand the test of time, defects are evident soon after they are built and sold.

The former CSIRO site was meant to contain a low profile high quality building nestled into the foot of Mt Ainslie, with associated landscaping and bush setting.

The existing building is of high quality and integrity in the international style of the late 20th century. It should be preserved and promoted for future generations to appreciate.

There is no reason why it could not be converted into high quality residential accommodation without impacting on Ainslie residents, the adjacent high school and Mount Ainslie reserve.

I strongly oppose the proposed demolition.

Friends of Grasslands

NCA

GPO Box 383

Canberra ACT 2601

email: worksapproval@natcap.gov.au

Dear Sir/Madam

Demolition of existing buildings on the former CSIRO headquarters site, Campbell (WA100168)

Friends of Grasslands (FOG) is a community group dedicated to the conservation of natural temperate grassy ecosystems in south-eastern Australia. FOG advocates, educates and advises on matters to do with the conservation of grassy ecosystems, and carries out surveys and other on-ground work. FOG is based in Canberra and its members include professional scientists, landowners, land managers and interested members of the public.

FOG has a-long standing interest in endangered species and communities on and adjoining this site, and commented on the Development Control Plan (DCP) 16/01 Blocks 4 & 5 Section 38 Campbell. Our concerns included a potential lack of compatibility between the provisions of the DCP and the future viability of the endangered species and communities at and adjacent to this site. The environmental values include a significant population of the endangered Hoary Sunray (*Leucochrysum albicans* var. *tricolor*) and area of Natural Temperate Grassland (NTG) listed in the ACT Government's *Action Plan 28* as an area of conservation category 2, as well as the Golden Sun Moth population mentioned in the Planning Report (February 2017). In this regard, we note that the Planning Report mentions endangered species but ignores the endangered communities present.

The tree assessment states that "where feasible the majority of high quality trees should be maintained on the site...." but makes no recommendation about specific tree retention or removal. This is very loose and in fact could allow removal of any tree if it is decided by planners that it is necessary. The Planning Report (February 2017) does say that only tree 27 will be removed. There needs to be clarification that the proposal will only remove the one tree.

Loss of mature native trees in woodland and grassland is identified as a threatening process in the critically endangered Yellow-Box – Blakely's Red Gum Grassy Woodland, and FOG would like to see that any removal of mature, naturally occurring trees is avoided.

The Planning Report (February 2017) also states that there will be no impact on threatened species on adjoining areas. However, it is difficult to ascertain what steps are to be taken to ensure that this will not occur. We could not find the attachments that are referred to in the mitigation section, which is presumably where these details are provided. Nor could we find any reference to protecting the area of NES in the civil plan under the protective fencing section (section 5). At the very least fences should be raised to protect the area and barriers erected to prevent damage from run-off.

Yours sincerely

Sarah Sharp

Advocacy Convenor

26 March 2017

Nancy Opdyke

Dear NCA,

I live at 72 Limestone Avenue, Ainslie, worked at CSIRO for 3 years, and also am a member of the Canberra Alumni committee, including a group that is trying to preserve the history of some of CSIRO's scientific legacy through collection of oral histories from aging former staff.

I didn't realize that an application had been filed to demolish the CSIRO buildings on Limestone avenue until I caught up on the weekend newspapers today. I know they had been sold but assumed the buyers would put in development proposals first. I think it is a mistake to let them take down the buildings before understanding what potential there is for reuse and what other plans they have.

Having read the material at

https://www.nationalcapital.gov.au/index.php/commitment-to-community-engagement/public-consultation/4515-blocks-4-and-5-section-38-campbell-demolition-of-existing-buildings I write to express my objection to the demolition of the CSIRO headquarters buildings.

I believe the heritage assessment shows that the complex has enough heritage value that it should at the very least be protected from 'demolition by neglect' and further documented, as well as investigated for adaptive reuse.

I also think the environmental assessment is rather cursory. Having worked in that building I know that the natural environment around it, with its rocky outcrops, snakes, echidna, birdlife, and mix of native and some exotic plants is unique in terms of being a fairly natural area so close to, and so accessible from, the road, but also serves as a sort of bridge to the suburb, for both people and birds / animals.

The rocks and other natural features are as iconic from the road as the buildings are - and so much more interesting and imposing than Campbell High School next door. Just think about the impact if that CSIRO block is emptied, the trees and some of the other features removed and/or smoothed over, as developers do, and something much more generic built there. It will then be the fairly bland high school next to a predictably bland new complex of some kind, and the whole area will be much less interesting.

We should be able to do better in Canberra, so close to landmarks like the War Memorial and Olims hotel. We should be able to turn the exiting buildings into something cool - perhaps a convention complex with the office building converted to a hotel and the existing conference center and the old finance building becoming meeting areas. At the very least the old conference center should have to be preserved - the woodwork is amazing. If the site is destined to be apartments or offices, maybe the conference center could be the gym or an on-site restaurant. Or, how about aged care accommodation in the office blocks with the conference centre being a dining room / activities hall.

Sorry - that's all just fantasy for an alternate future where developers don't rule the world - but back to the present issues: I don't think the new owners should be allowed to tear the buildings down before they have said what their plans are - presumably they want to both save money and avoid development approval problems later, but I think for such an iconic and visible site they should just have to go slowly. In particular, I think the new owners should have had to provide security and protection for the buildings. I gather from both the newspaper article I read, as well as the heritage assessment, that there has been vandalism and looting. That should not have been allowed to happen, the new owners should be held responsible for the damage to a possible heritage site, and should have to protect it while this application is under consideration, rather than thinking they can claim that the damage now means they have tear everything down! Shame on them, and shame on our system if we don't protect buildings that may have heritage value while that value is being assessed!

In conclusion, I object to the demolition of these buildings. I think the recommendations of the heritage assessment should be considered carefully, the buildings should be secured and physically protected while that is happening, and I think a more thorough assessment of the combination of the environment and its relationship to the buildings, the heritage significance of the buildings, the iconic nature of the site and it's visibility from a major street so close to the War memorial and heritage buildings like Olims, and the potential for adaptive reuse should all be taken into account.

My Regards,

Change.org online petition with 161 online signatures – submitted by Shane West

Subject: Help stop the demolition of the landmark CSIRO HQ building- submissions close on the 27th! Change.org

Dear Andrew,

Please refer to the 160 + concerned Canberra citizens who have signed the online petition wanting changes to the NCA policy and procedures so the NCA will represent and consult in the best interest of the Canberra community. This will require a redirection of effort and policy by the NCA to now accommodate appropriate heritage and environmental studies to be conducted before even considering Works Approval for demolition.

The Works Approval for demolition is not supported by the local community as ascertained by the two street survey submitted by Graham Crompton and the 160 + online petitions attached.

We would greatly appreciate if the local environment, heritage and associated concerns raised in these petitions are discussed urgently and appropriate community consultation and planning issues are fully considered and addressed by the NCA planning section and NCA board of management.

https://www.change.org/p/help-stop-the-demolition-of-the-landmark-csiro-hq-building-submissions-close-on-the-

<u>27th/share?utm_medium=email&utm_source=notification&utm_campaign=recruit_notification</u>
Regards

Shane West