

Comments from the public

The pre-Development Application community consultation for Common Ground Dickson commenced on 12 September and closed on 7 November 2019.

Comments were received through the YourSay website, by email or by phone calls. The total number of individual comments received was 76.

The following key issues were raised via YourSay, email and phone:

Issues	Number of submissions
Support for the Common Ground model	20
Opposition to the removal of trees	20
Building height	8
Opposed to proposed site	13
Poor design	3
Problems with information provided	6
Traffic and parking impacts	11
Support and management structure for Common Ground	3
Potential site flooding	4
Block 25 should be part of a plan that covers all of Section 72	5
Facilities and operations of Common Ground	9
Need for additional facilities in surrounding area	2
Need for an Environmental Impact Statement	1
Soil contamination	2
Consideration of heritage, climate and social impacts	1

The issues and comments captured in writing were also reflected at pop-up information sessions. The key issues raised are summarised below and responses are provided.

Support for Common Ground

There were twenty submissions supporting Common Ground. In some instances this was conditional on other issues being addressed, such as the removal of trees.

Response

Support is noted.

Opposition to the removal of trees

There were twenty submissions which raised concerns about the possible removal of trees both within and outside of Block 25.

Response

There is one Regulated tree located along the eastern boundary of Block 25 Section 72. The retention of this tree has been included in the proposed design.

The proposed design has been revised to show a driveway for waste access along the southern boundary of the block. The proposal has always included a stub road along the northern boundary of the site, but this has been redesigned to include additional surface car parking. These elements are both within the boundaries of Block 25 and as such there are no regulated trees affected by them.

There is no intention to remove any trees beyond the boundary of Block 25 to facilitate the construction of Common Ground Dickson. A tree management plan will be prepared to make sure any potential impact construction works may have on surrounding trees beyond the block boundaries are considered.

The proposed design seeks to retain the many valuable trees surrounding Block 25, including the *Quercus Suber* (Cork Oak) and the *Eucalyptus Maidenii* (Maiden's Gum) trees to the south, and optimise views and access between the development and these surrounding areas. The established landscape setting of Section 72 provides a visual buffer between the proposed development, the Dickson channel and nearby residences along Dumaresq Street.

The design concept for Common Ground Dickson has been developed in response to community feedback (received during community engagement undertaken by the Environment, Planning and Sustainable Development Directorate in 2018). The design seeks to take advantage of the immediate surrounds, including the trees along the Dickson channel corridor to the immediate south of Block 25 which will provide improved amenity for the residents. Additionally, a high quality landscaped area is proposed for the Common Ground development, with deep rooted plantings located across the site which will add to the existing plantings in the area enhancing the landscape character of the site.

It is noted that there will be further work on the remainder of Section 72 which will consider the trees, as well as connections and movement through the area.

Building height

Eight submissions considered that the proposed height of Common Ground Dickson was too high, with the community supporting developments similar to existing buildings in the area but no more than three to four storeys.

Response

The design of the building has been guided by a range of factors, including the views expressed by the community on Section 72 during the 2018 community engagement. There were a range of issues considered important such as green space, urban amenity, retention of trees, a mix of land uses and building types, building height and design, public safety and improved walking and cycling connectivity. The dwelling mix and design is also influenced by the people who will be living there – with a focus on supporting women and children, families and single parents and older women.

Translating these issues into a design has seen the size of the block reduced to allow for roads and access ways, to address connectivity issues, retain trees and provide extensive green and communal spaces as part of Common Ground Dickson.

During the community engagement undertaken on the urban renewal of Section 72 during 2018, there was support for a range of building heights. Of the 21 comments relating to building heights:

- 5 supported 3 – 4 storeys
- 4 supported 4 – 6 storeys

- 1 supported a mix of building heights.

The majority of the building is four storeys or below (86.6 per cent), with a limited six storey element in the middle of the building. This means the majority of the building sits below the height of the trees running alongside the Dickson Channel. Combined with the 75 metre separation between the proposed building and the nearest properties (Dumaresq Street), this allows for a generous natural buffer across the Dickson Channel.

The six storey element is confined to the centre of the building which minimises the impact of the taller element on the surrounding area. The design has also been peer reviewed by the National Capital Design Review Panel which is supportive of the proposal.

The design of the building is sensitive to the natural and built environment that surrounds it, and reflects the increasingly urban form of the Dickson Town Centre. The building has been designed to take advantage of the vistas to Mount Ainslie, Mount Majura and Black Mountain, whilst ensuring that there will be minimal overlooking of the properties to the south of the site. The development takes advantage of the established tree line to the south and the distance to the residences along Dumaresq Street to minimise any impact, which includes overlooking and overshadowing. The shadow diagrams show that the nearby dwellings will not be affected.

It is considered that the proposed design responds to the existing urban design environment and evolving urban form of the adjacent Dickson Group Centre, and aims to achieve the best possible design outcome for the building and the surrounding public spaces.

The design does not set a precedent for further development in the area. The design is an individual response to the site and establishes its own identity and character. There will be further engagement with the community by EPSDD about the future urban form of Section 72.

Opposed to proposed site

There were thirteen submissions which opposed the site as the location for Common Ground.

Response

The site is considered to be a good location for Common Ground - it is in close proximity to amenities and essential services such as transport, education, employment, retail, health and community services. This location in Dickson will support people from diverse backgrounds who want to access services, play, learn, live and enjoy the area like every other local resident. The proposed development will replace a vacant site with a high-quality community facility.

The intention to build a Common Ground within Section 72 was announced in 2016 in the lead up to the ACT Election. It was agreed as a policy priority by ACT Labor and ACT Greens in the Parliamentary Agreement for the 9th Legislative Assembly. In the 2018 community engagement undertaken by EPSDD on Section 72, the intention to construct Common Ground within the precinct was referenced and discussed as part of the broader conversation around the future of Section 72.

In discussions to date with the community about Section 72 Dickson there has been broad support for sustainable, supportive and community housing, co-housing, public housing and housing for people to age in place in this area.

Common Ground is not public housing, it is a community housing model that provides housing for people who are experiencing homelessness or are at risk of homelessness plus affordable renters. There will be on-site support services provided for residents which is designed to help tenants

achieve and maintain housing stability – this model of support is not provided to public housing tenants.

There have been discussions with the Common Ground Canberra Board and others on the strengths and weaknesses of the first Common Ground Gungahlin and new features to be included in Common Ground Dickson, e.g. ground floor community spaces to be more flexible, space for a social enterprise, and a park area to allow for improved connections with the community. The spaces on the ground floor will be available for use by the broader community. The change will bring increased social infrastructure to the area with greater opportunities for community activities, social interaction and a centralised plaza with a playground and community gardens.

The design of the building is sensitive to the natural and built environment that surrounds the site. The development takes advantage of the trees to the south and the distance to the residences along Dumaresq Street to minimise any impact, including overlooking and overshadowing.

There is no intent to remove any trees in the green corridor to build Common Ground Dickson on Block 25.

Poor design

There were three submissions concerned about the proposed design.

Response

The design of the building has been guided by a range of factors, including the views expressed by the community on Section 72 during the 2018 community engagement. There were a range of issues considered important such as green space, urban amenity, retention of trees, a mix of land uses and building types, building height and design, public safety and improved walking and cycling connectivity. The dwelling mix and design is also influenced by the people who will be living there – with a focus on supporting women and children, families and single parents and older women.

Translating these issues into a design has seen the size of the block reduced to allow for a road and accessway to address connectivity and retain trees and provide extensive green and communal spaces as part of Common Ground Dickson.

The majority of the building sits at four storeys or below (86.6 per cent), with a limited six storey element. It is considered that the proposed design responds positively to the existing urban design environment and evolving urban form of the adjacent Dickson Group Centre and aims to achieve the best possible design outcome for the building and the surrounding public spaces.

There is no shadowing of the residences along Dumaresq Street and the trees to the south of Block 25 provide a natural buffer to any overlooking of the properties, which are some 75 metres away.

This design is in line with Housing ACT's ongoing commitment to provide tenants with safe, affordable and appropriate housing in a sustainable social environment that are well-designed and energy efficient which moves away from the early designs of public housing, such as those along Northbourne Avenue.

Problems with information provided

There were six submissions which raised concerns about the ability to understand the information presented – with specific comments about the drawings.

Response

The plans and information were intended to provide the community with as much information as possible about the proposed development of the site. Some of the information was updated during the community consultation period to clarify details and to provide new information in response to questions from the community. This added transparency to the process.

At the same time as the pre-Development Application community consultation, EPSDD released Draft Variation to the Territory Plan No 367 to show the proposed changes to the Territory Plan.

Undertaking the community consultation for the Territory Plan Variation and the pre-Development Application in parallel was considered to provide the community with a fuller understanding of the development.

Traffic and parking impacts

There were 11 submissions which raised concerns about potential traffic and parking issues.

Response

The development of the site has been guided by a range of factors, including the views expressed by the community on the future of Section 72 during the 2018 community engagement. There were a range of issues considered important such as permeability and improved walking and cycling connectivity.

To make sure that the development of Block 25 does not constrain future connections the developable area was reduced and an access way (to the south) and road (to the north) are proposed. These will provide access to the site, space for a garbage truck and on-site parking. The pavement will be designed to Territory standards so that when the future connections are finalised, there is limited further work required.

The traffic and parking issues associated with the Common Ground Dickson development have been addressed through the design progression and a traffic impact assessment is being submitted with the Development Application. The traffic impact assessment considers that the increase in traffic generated by Common Ground Dickson will not adversely affect the operation of either the intersection of Hawdon Place and Antill Street nor Hawdon Place.

Given the proximity of the site to excellent public transport and active transport infrastructure the level of car parking shown in the pre-DA designs was less than that which would be required under the *Parking and Vehicular Access General Code* (the Code). However, in response to the community's feedback, the car parking provision for Common Ground Dickson has been reassessed and the number of car parks has increased substantially in the proposal that will be submitted for development assessment.

In summary, the number of car parks in the basement has been increased to a minimum of 36 – which includes 20 accessible car parking spaces. If none of the accessible parking spaces are required, the car park can be reconfigured to provide 45 spaces. The number of car parking spaces in the northern road and southern access way is now 48.

The use of Hawdon Place, and the verge areas, for parking during sporting events at the Dickson Playing Fields was noted. This impact seems to be restricted to mornings on the weekends, and when athletics events/training (e.g. Little Athletics) are held (which focus on the south western area

of the Dickson Playing Fields). The final proposal includes eight car parking spaces along Hawdon Place.

The proposed design has been revised to show a driveway for waste access along the southern boundary of the block. The proposal has always included a stub road along the northern boundary of the site, but this has been redesigned to include additional surface car parking. These elements are both within the boundaries of Block 25 and as such there are no regulated trees affected by them.

There is no intention to remove any trees beyond the boundary of Block 25 to facilitate the construction of Common Ground Dickson. A tree management plan will be prepared to make sure any potential impact construction works may have on surrounding trees beyond the block boundaries are considered.

Support and management structure for Common Ground

There were three submissions which asked questions about the tenancy and support services to be provided at Common Ground.

Response

Common Ground is a community housing model that provides for a minimum of 50 per cent of the total dwellings to be supportive housing for people who have experienced, are experiencing or are at risk of homelessness, meaning residents will receive on-site support services. The remaining dwellings (up to a maximum of 50 per cent) can be for community housing comprising affordable rental that will be managed by a community housing provider.

It is intended for tenancy and property management services to be delivered separately from resident support services. The provider of property and tenancy management and the provisions of services to residents will be determined through a tender process which will be undertaken at a later date.

For some residents, Common Ground Dickson will be a long-term home, for others it may be a step to either renting privately or purchasing their own home. The wrap-around support services Common Ground offers enables tenants to pursue whichever path they choose to take.

A range of issues will be considered when deciding who should live at Common Ground Dickson, and taking their circumstances into account, people will choose whether they want to live there or not. The success of the Common Ground model relies on on-site support services for residents, which are offered to help people achieve and maintain housing stability, with the aim of supporting them to move back into the community as and when that occurs. It is not expected that all applicants will be experiencing domestic and family violence - the evidence suggests that there are other emerging cohorts experiencing or at risk of homelessness, such as young people aged 16 to 24 and older women.

Need to consider impact of flooding.

Four submissions raised the risks associated with the site potentially being flooded.

Response

The Sullivan's Creek catchment is not prone to extensive flooding, although it experienced minor flood events in 2002, 2010, 2011 and 2012 and a major flood was experienced in the top end of the catchment in February 2018. The rainfall which was the source of this event appeared to begin in the

Ginninderra catchment, moving south east and peaking at Southwell Park. The rainfall event was measured as exceeding the 0.2 % Annual Exceedance Probability (AEP) (1 in 500 year event). Rainfall intensity dropped away to 5% AEP (1 in 20 year event) in other parts of the Sullivan's Creek catchment.

The ACT Government has re-assessed predicted flood paths and flood levels for catchments in the ACT using flood studies based on current industry standards. The latest flood maps, which have been developed for each catchment and reviewed by independent experts for accuracy in accordance with industry standards, were released on 4 December 2018 (see: actmapi.act.gov.au) and show Section 72 as having less than a 1% chance of flooding in any given year.

The overland flow paths from outside the site are captured by the road drainage via Hawdon Place and Antill Street. The overland flow paths within the existing roads all drain into the previously mentioned floodway located on the south of the site.

The designs for Common Ground Dickson have considered this information. The detailed designs for Common Ground Dickson will respond to previous flooding in the area and consider the most recent flood mapping. Possible design and construction responses will be further considered during development of final plans.

Block 25 should be part of a plan that covers all of Section 72

There were five submissions which considered that Block 25 should be part of an overall plan for Section 72.

Response

Addressing housing affordability and homelessness is a long term commitment of the ACT Government. It was agreed as a policy priority by ACT Labor and ACT Greens in the Parliamentary Agreement for the 9th Legislative Assembly. In the 2018 community engagement undertaken by EPSDD on Section 72 the intention to construct Common Ground within the precinct was referenced and discussed.

In the 2018 community engagement, a range of issues were considered to be important to the community such as green space, urban amenity, retention of trees, a mix of land uses and building types, building height and design, public safety and improved walking and cycling connectivity. The design for Common Ground Dickson has responded to these issues. For example, a public plaza to the northwest of the block will facilitate a future central 'heart' for the area, a community garden/green space will enable others in the area to come and participate, there are communal areas which will be available to the community as well as a 'social hub' which could be used as a café, in the south-west corner of the building.

These communal spaces in the building will be available for residents of Common Ground Dickson specifically, as well as for the broader community. While the design responds to the surrounding uses, such as the residential areas, the development needs to establish its own identity and character. This is being done through a different form, scale and heights than what may be expected in such an area.

Facilities and operations of Common Ground Dickson

Nine submissions asked questions about the type of facilities, utilities and services that would be provided at Common Ground Dickson.

Response

Housing ACT will consider installing water meters into individual units, which would allow residents to monitor their own usage of water. But it is noted that tenants do not pay for water usage, so such meters would be provided for information only.

All units within Common Ground Dickson have been designed to meet Class C Adaptable standards (AS4299). The corridors and lifts provide adequate space for people who may need a wheelchair or who have mobility requirements. Noting all units will be adaptable, it is not possible to identify which will actually be occupied by people with disabilities or mobility requirements. This will be a matter for the future tenancy and property manager to consider. However, the property manager can enter into a Personal Emergency Evacuation Plan with tenants as and when required.

The installation and ongoing maintenance of solar panels will be considered as part of the overall project budget. The building has been designed with a high level of consideration given to the safety and security of its residents. Security features (e.g. swipe cards) will control the movement of people into and throughout the building. An ongoing concierge service may be provided depending on funding availability. The building design also offers a high level of passive surveillance to both common areas and the street and urban realm, which has been found to discourage anti-social behaviour. Designing a building or site for the safety of women and children is designing for the safety of all.

There have been discussions with the Common Ground Canberra Board and others on the strengths and weaknesses of Common Ground Gungahlin and new features to be included in Common Ground Dickson, for example designing the ground floor community areas to be more flexible, space for a social enterprise, and a park area to allow for improved connections with the community.

Need for additional facilities in the surrounding area

Two submissions considered that there needed to be additional facilities in the area.

Response

There are communal areas being provided as part of Common Ground Dickson and the site is close to the Dickson Playing Fields, the Dickson Wetlands, Majura Tennis courts and the Dickson Aquatic Centre. Throughout the community engagement on Section 72, one of the community's top priorities for Section 72 Dickson was upgrades to the Dickson Pool forecourt. In response, a number of improvements to revamp the Dickson Pool forecourt area during summer are being trialled. There are currently no plans to redevelop Dickson Aquatic Centre into a year round facility.

In addition to this, the following play spaces were selected by community members in the Better Suburbs Play Spaces Forum last year to receive either an amenity upgrade (e.g. new shade sail, seating, path access, etc) or a refresh (new paint, mulch, edging, etc). These works have either been completed or will be completed by the end of June 2020:

- Campbell – White Crescent – paths and refresh
- Campbell – Glossop Street – shade sail
- Hackett – Bragg Street – natural elements
- Hackett – Tyron Street – refresh
- O'Connor – Cockle Street – access/inclusion

- Lyneham – Lambert Place – refresh

Two other play spaces in the inner north have been nominated for upgrade works – Simpson Street and Harding Street in Watson. Glebe Park in Civic was also selected by the Play Spaces Forum members for a new nature play space. Construction will begin very soon and will be completed by next year (2020).

Need for an Environmental Impact Statement

One submission raised the need for an Environmental Impact Statement.

Response

Housing ACT considers that the development of Common Ground Dickson on Block 25 does not require an Environmental Impact Statement.

In 2014 a report was prepared on the general ecological characteristics of, and to identify potential ecological constraints associated with the potential for future development of Section 72 Dickson. Based on the work conducted the report advised that there were no ecological triggers for an Environmental Impact Assessment, and therefore the potential re-development of Section 72 is not subject to assessment in the impact track under the *Planning and Development Act 2007*.

The report further advised that the potential re-development of Section 72 would not have a significant impact on matters of national environmental significance. A referral under the Environmental Protection and Biodiversity Conservation Act is not warranted.

There has been no further assessment into the ecological characteristics of Section 72.

Soil contamination

Two submissions raised concerns about possible soil contamination on the site.

Response

Block 25 Section 72 Dickson is not recorded on the Environment Protection Authority's contaminated sites management database or geographic information system. Nor is the site recorded on the Register of Contaminated Sites under section 21(A) of the *Environment Protection Act 1997*.

In 2010, the Canberra Space Dome and Observatory was destroyed by fire. The buildings contained asbestos but the records held by the Environment Protection Authority (EPA) show no record of receipt of a clearance certificate following demolition and clean-up of the site.

A Phase 2 environmental assessment of the site was carried out in 2014 which concluded that the site would be suitable for land uses permitted under CZ6: Leisure and Accommodation on the condition that an asbestos management plan and unexpected finds protocol were implemented prior to any earthworks on the site.

Based on the 2014 environmental assessment and the absence of any significant changes, an updated 2019 preliminary site investigation report concludes that the site is also considered suitable for the land uses permitted under the CFZ: Community Facilities zone, including sensitive land uses such as childcare centres. The site is also considered suitable for residential uses.

The 2019 site investigation report was submitted to the EPA for its consideration. The EPA has assessed the report and supports the consultant's findings that the site is suitable for the land uses permitted under the community facility zone, including residential uses such as supportive housing and community housing, and other sensitive land uses such as childcare centres. This is subject to

the condition that a site specific Construction Environmental Management Plan (CEMP), incorporating an unexpected finds protocol and an asbestos management plan, must be prepared by a suitably qualified environmental consultant and implemented during development works. The CEMP must include, amongst other things, appropriate procedures for the identification, assessment, management, validation and disposal of potential contamination at the site and contractor induction procedures into the use of the CEMP.

Consider social, climate and heritage impact

There was one submission which asserted that the social and heritage impact of Common Ground Dickson being developed on Block 25 Section 72 Dickson needed to be considered.

Response

Canberra's original aerodrome is not listed on the ACT Heritage Register (nominated or otherwise). No nomination has been received for the aerodrome as of 13 November 2019. Should a nomination be received, the ACT Heritage Council will notify all interested persons.

It is noted that since the aerodrome was closed, the area has been developed for urban uses, including the licensed club and planetarium that occupied the site before fire destroyed it in 2010. The history of the area as an aerodrome has previously been acknowledged with a plaque at the Dickson Library.

The *ACT Climate Change Strategy 2019-2025* has a strong focus on reducing greenhouse gas emissions. Siting Common Ground Dickson close to Dickson Group Centre and its associated public transport services (including direct access to a major cycle path) will encourage people to use active travel to reach shops, health, employment and other community services. Gas will not be supplied to Common Ground Dickson and electricity will be sourced from renewable sources from 2020. The possibility of establishing solar panels on the roof to source power for common area uses will be explored.

Canberra's Living Infrastructure Plan: Cooling the City sits alongside the *ACT Climate Change Strategy 2019-2025* and recognises the Government's commitment to a development target of 70 per cent within the existing urban footprint.

As the designs for Common Ground Dickson are finalised a landscape plan will be prepared which will maximise both tree canopy cover and the use of on-site permeable surfaces.

Any development on this block must comply with the water sensitive urban design general code which establishes requirements for responsible urban water management including features such as on-site capture of stormwater generated by the development with that water being used for irrigation or for toilets and laundry purposes.