



3 November 2016

Environment, Planning and Sustainable Development Directorate
GPO Box 365
Canberra City ACT 2601

Re: Development Application 201630298

The Belconnen Community Council strongly opposes this development application (DA). This DA does not meet the expectations of the community at large. The proposed fast food drive through facility is inappropriate for the location, and contrary to the expectations of the community following the release of the updated Belconnen Town Centre Master Plan (the master plan). It would also create significant traffic issues on a problematic corner.

The recently released master plan is the result of the most extensive community consultation process undertaken by the ACT Governments Environment and Planning Directorate (EPD) for any master plan to date. In both the draft and final master plan process, EPD received more submissions from the public and community groups than any other master plan.

In the many public meetings and information sessions held by both EPD and the Belconnen Community Council (BCC) during the consultation process, it was clear that Emu Bank was important to Belconnen residents, workers and visitors. The master plan creates a vision for future development in this area that would address the frustrations people identified with Emu Bank, and enhance the aspects that the community loved.

A strong aspect of the new master plan is to provide an incentive for property owners along Emu Bank to relocate fast food drive through businesses to other more suitable locations in the town centre (such as the services and trades area), that are better served by suitable road access for the types of traffic that drive through fast food outlets create.

As the master plan is now in place, the precinct code governing permitted development is about to be updated. The community consultation process is due to begin shortly. The development on this corner would be unlikely to be approved under the proposed precinct code, based on the community expectations that the new master plan has created, and the vision of Emu Bank that ACT Government planners have presented to the community.

Although the precinct code hasn't been updated, it doesn't mean this DA should be approved. It is contrary to everything the community expects. People must have faith that the views they expressed through the master plan consultation process have been considered.

The traffic issue that this proposal would create is of particular concern. The traffic report accompanying the DA indicates that access to the site is restricted to entry and exit to the left. As the report states:

“The reasons for this restriction on right turning movements is due to the limited road width available for right turning vehicles entering the site (with no capacity for a right turn lane for storage of right turning vehicles) and the proximity of the signalised intersections (15 metres to the west and 45 metres to the east) and high volume continuous traffic streams in both directions along Emu Bank”

The limited road width is a concern if drivers seeking to access the site are travelling in the ‘wrong’ direction, undertaking a U turn further along Emu Bank will be quite dangerous. The existing fast food drive through locations already create traffic bottlenecks, another is not required and is contrary to the ACT Governments expressed desire to address traffic issues along Emu Bank by encouraging existing fast food drive through businesses to relocate.

In the calculations of vehicle numbers, the traffic report does not take into account new developments already underway such as Wayfarer, at the corner of Eastern Valley Way and Aikman drive, with 331 new apartments expected to house over 500 cars. There are further apartments to be built in this area including the Section 200 complex of residential towers on the Labor club car park and the two apartment blocks on Emu Bank immediately in front of the Westfield carpark facing Lake Ginninderra. Residential development will also be built along Aikman Drive. All this extra traffic will impact Emu Bank and the entrances proposed in this DA will only create traffic issues on this problematic corner.

Public transport interactions and other heavy vehicles in the area do not appear to have been given a reasonable level of consideration in the DA. The site is directly opposite a major public transport facility entrance with several hundred movements a day all running past the proposed entrance or exit to the proposed facility.

How will amelioration of peak traffic periods be dealt with in road and access infrastructure planning for this facility? It is not clear. What is clear is that the cost would be borne by the ACT community and not the developer of the site.

The DA is also makes it clear that cyclist and pedestrian access to the site is secondary and not well planned in relation to the drive through aspect. This is of concern given the target market is clearly reliant upon children at the skate park and the high school only 100 meters away.

In summary, the DA proposed for this particular location is inappropriate on the following grounds:

- Community expectation around the Belconnen Town Centre Master Plan process indicate that Emu Bank problems must be addressed, not added to.
- This DA would not be compliant with the precinct code that will emerge from the Master Plan process.
- The drive through aspect of the proposal will locate extra driveways very close to the corner of a road that carries enormous volumes of traffic. The fast food drive through further along Emu Bank already creates traffic issues.
- Access by trucks seeking to service the proposed facility will create dangerous traffic issues.
- The entrance/exit is directly opposite the Belconnen bus interchange exit., impacting public transport.
- Access by pedestrians or cyclists to the building is not clear and appears perfunctory, with the drive through customer aspect predominantly catered for

- The new Master Plan suggests redirecting traffic away from Emu Bank. This development designed for people in cars to drive through and not stop, conflicts with the ACT Governments intentions.
- Emu Bank already has disaggregated car parking with many confusing entrances and exits. This development proposes to add two more.

A further observation unrelated to planning, but clearly felt by the Belconnen community is that the ACT government advocates healthy lifestyles. Permitting a fast food outlet next to a skate park used almost exclusively by youths, and so close to a high school, conflicts with this intention and undermines programs aimed at reducing obesity.

The BCC rarely oppose private developments taking place in Belconnen. In this instance the proposed DA is highly inappropriate and should not be approved.

The site is problematic and that is borne out by several failed and lapsed DA's that precede this one. The BCC recommend that this block be acquired by the ACT Government and incorporated into the existing skate park or turned into some much needed green space for the future residents of the high-density residential accommodation planned for the area.

Emu Bank has great potential that is currently not best realised. The new master plan has created great expectations in the community that the poor planning decisions made in the past, that have led to the problems along Emu Bank today, can be resolved over time. The BCC request that this DA is not approved. Approving this DA would conflict with the vision contained in the new master plan, and be contrary to community expectations.

Regards



Damien Haas
Chair, Belconnen Community Council
3/11/2016