CONSOLIDATED COMMENTS KINGSTON ARTS PRECINCT - DRAFT MAJOR SUBDIVISIONS (ESTATES) CIRCULATION 1 – 31 January 2025

All agency comments have been consolidated into the table of response below for the Developer's consideration, response and or action.

Some entities have raised comments that will require to be addressed prior to endorsement of the draft Major Subdivisions (Estate). Any revised documents submission must include a response addressing entity comments and any relevant written entity endorsements provided must be clearly linked to an identified document version.

AGENCY	COMMENTS	PROPONENT RESPONSE
Deed Management	Block details plan: A. Why are blocks a/AA and c/AA separate? Is this intended to be separately leased? If it is all intended to be Territory Land in the future, these blocks could be combined. B. Suggest access easements on block b/AA are removed from this plan, and the access easement left only as a planning control. This will allow flexibility with a future building design on this block. C. Why is the road access around the future car park shown to include a pedestrian access easement? Is this road intended to be a shared zone? This easement also omits vehicular traffic. D. Label the power house block (in all relevant plans) as new block boundary has been proposed, and also identify the block area.	Block Details Plan: A. The project wishes to retain the flexibility to lease the blocks separately in the future and therefore ha separated the blocks B. Noted, easment to be removed, will be a planning control in territory plan. Block detail plan will have easements on it. This is as easements are intrinsic details to the block. PCP- The plans must only identify those requirements that are sought for inclusion into the Territory Plan. Therefore these are controls ONLY. C. With regard to the rationale for the proposed easement accommodating waste vehicle and pedestrian movement, this was intended to facilitate an east—west
	Planning Controls Plan: E. Please show the access connection requirements on block b/AA as indicative (arrow icon/annotation only), to indicate the requirement for an access connection and minimum width, but that does not lock in a location for this easement connection as part of this SDA. The planning controls could be included in the relevant TP codes and be considered as part of the future building DA where it can be coordinated with a responsive building design.	active travel connection while also ensuring service access to the blocks. This has been addressed in the Planning Report. D. The boundary around the powerhouse has been dissolved. Planning Controls Plan: E. Red Carpet Axis: Will be changed to a planning control within the Territory Plan(TP), with additional

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- F. Please take easements off this plan these are to be shown on the block details plan & subdivision plan only
- G. Query if these access easements need to be for vehichles/emergency vehicles? This would remove a driveway crossing on Eastlake parade and provide a better pedestrian/active travel priority.

General:

- H. The access road to Printers Way appears quite congested, and has a number of competing vehicular/pedestrian movements. This includes reversing movements for waste vehicles servicing block b/AA, waste collection for the adjacent block 1 Section 52, public pickup/setdown traffic to the precinct as well as ingress/egress to the future car park. This area may require further assessment/coordination with TCCS to ensure this will function adequately
- The design should consider future pedestrian desire lines through the site to Trevillian Quay, and determine if pedestrian priority measures should be adopted (shared zone, ped crossing etc) to enable safe passage along these desired connections.
- J. Block b/AA should include the minimum number of driveway crossovers the future building DA could put forward additional access/egress as required.

requirement for emergency service access to be able to reach the S49 B12.

Trevillion Quay Axis: Will be changed to a planning control with the TP, with additional requirement for emergency service access to be able to reach S49 B12. Car Park Loop: Will be changed to be an additional requirement, where in additional requirement for emergency service access to be able to reach the eastern edge of Fitters Workshop and the northern edge of former transport depot.

The plans must only identify those requirements that are sought for inclusion into the Territory Plan. Therefore these are the 2 controls ONLY. The remainder sits as easement conditions which are reflected on the block details.

- F. Duly noted. Planning Control Plan will only reflect provisions to be included in the Territory Plan. The plans must only identify those requirements that are sought for inclusion into the Territory Plan. Therefore these are the 2 controls ONLY. The remainder sits as easement conditions which are reflected on the block details.
- G. As per response E.

General:

- H. The easement for block AAc has been provided for exactly the issues raised. The vehicles need to loop around the block. Pedestrian movements have been broadly detailed, and can be further worked out at main works DA for the car park. Further ARUP has considered these as part of the TIA.
 - We can organise TCCS meeting if needed at SDA
- I. A pedestrian crossing to Eastlake Parade is outside the scope. This will be determined and addressed in the future DA for block AAb. A potential future pedestrian

		desire line can be added to the Active Travel Plan in this area at a diagrammatic level. J. Duly noted
ACT Heritage - Meaghan Russell	20250226 - Advice - Kingston Arts Precinct	
	 A. 'Amendments to the Site Analysis Plan (ref AR-0-100-005-01) to adequately identify all heritage considerations as it is understood that this plan is being used as a foundation for associated planning; B. Further information and amendments to demonstrate that all significant heritage trees are to be retained (where extant) and that future development will not preclude required reinstatement of the historical planting pattern in accordance with Specific Requirement iii) a) and Conservation Policy 7.1; a. This must include a finalised arborist report which clearly identifies extant heritage trees and impacts to these trees, and which describes measures to avoid and minimise impacts to tree health during works. This report must also identify if adequate space for replanting sympathetic trees will be retained; 	 A. Noted, document to be updated B. Existing trees to be retained are identified on the Tree Management Plan. Future development including public realm works to the Territory Asset are indicated on the Indicative Landscape Master Plan, which also indicates reinstatement of the historical planting pattern. Further detail is subject to future DA, note the indicative Landscape Master Plan. The indicative Landscape master plan shows minor encroachment and the demolition plan shows scraping of natural ground and removal of existing pavement. Protection measures and TPF will be finalised as the report is updated to this stage of review. Arborist to indicate protection works during construction that includes fencing to TPZ.
	C. Amendments and further information to demonstrate that modification to and new services within the railway embankment will not have significant adverse heritage impacts. Specifically, the following is required: a. Detailed mapping all proposed works overlain with the embankment and areas of known railway tracks within the embankment; b. Reduction in the extent of works to the embankment that would significantly change the form or affect original fabric, to ensure adequate conservation of this significant feature; c. Consideration of alternatives that could minimise heritage impacts, and adoption of these were reasonably practicable;	C. Proposed services within this area are subject to Future DA. Detailed mapping can be provided at this stage.

- D. Assessment by a structural engineer of all earthworks adjacent to heritage structures, to evaluate whether works may have adverse effects on the structural integrity of those structures. This assessment must also include recommended measures to implement during works to maintain the integrity of heritage structures, including a vibration monitoring program
- E. 'A desktop archaeological study which considers the area of ground disturbing works to the north-east of the Depot as required by Conservation Policy 2.5;
 - a. Where the above identifies the need for archaeological excavation to assess whether railway tracks are present, a variation to the project's Excavation Permit must be sought and obtained prior to the additional excavation work being undertaken.
- F. In the event that the above actions and/or further Council advice identify that early works may diminish the heritage significance of the Powerhouse Precinct or Depot:
 - a. Alternatives that could avoid or minimise heritage impacts must be reviewed and adopted where reasonably practicable; and
 - b. Where heritage impacts cannot be avoided, a Statement of Heritage Effect application must be made under Section 61G of the Heritage Act 2004, to demonstrate this to the Council's satisfaction;
- G. It is also noted that any future development application/s resulting from the Draft Major Subdivision must include the following:
 - An Archaeological Management Plan (AMP) to be implemented during all ground disturbing works (including enabling works) as required by Specific Requirement iii)e) and Conservation Policy 2.3. This must, at minimum:
 - a. Identify archaeological areas with specific management requirements, as informed by the desktop archaeological study and completed archaeological testing;
 - b. Identify areas for archaeological monitoring, and provide a methodology for monitoring including thresholds at which monitoring would cease and/or manual archaeological excavation would commence; and

- D. Noted. structural design of new buildings will consider impacts to heritage structure, and a specification of vibration monitoring during construction will be developed.
- E. Provided within Heritage ESO.
- F. Duly noted. Documents will be provided for review prior to any commencement of works on site.
- G. Duly noted. Documents will be provided for review prior to any commencement of works on site.
- H. Duly noted

	 c. Describe Unanticipated Discovery Protocols (UDPs) and set stop work provisions for archaeological finds that are significant to the Powerhouse Precinct or the Depot; and d. Measures to manage any recovered heritage objects. H. Detailed information on redevelopment outcomes is not available at this stage, and further information will need to be submitted to the Council to inform future heritage advice on the broader project. The Council will also provide separate advice to the proponent on heritage conservation requirements for the Powerhouse Precinct and the Depot that should inform detailed design. 	
ACT Parks and Conservation Service	- Comments provided through the Conservator	Duly Noted
Climate Change Policy	We have no comments to provide.	Duly Noted
Conservator Liaison - Stacee Coghill	The ESCP concept drawing (CC-0-110-005), the Indicative WSUD Master Plan (CC-0-113-003) and the Pre-circulation Reports and Annexures, are supported in principle. The DA submission drawing(s) will need to: Reference and use of the 2022 ACT EPA Guidelines for Construction and Land Development. Provide technical notes advising inspection regimes, showing standard arrangement drawings, and other relevant assessment information. Provide a washdown area adjacent to the main construction accesses. Make contour labels more legible. Include overland flow path directional arrows. Any other control measures to ensure all construction runoff is contained and treated onsite.	Combined response for comment 20, 24 and 25, which relates to the need to comply with EPA guidelines. As part of that, the proposal must align with the contamination ESO requirements. For instance, the cut and fill drawings will involve excavation works, which must be undertaken in accordance with the protocols outlined in the contamination ESO. These requirements will need to be clearly reflected in the drawings. Proposed note to be included on relevant plans: "Note: this drawing acknowledges the requirements detailed in EPA Endorsement Letter dated 30.06.2021. Refer to the Development Environmental Management Plan (reference PS103124-CLM-REP-101 RevF, dated April 2021), for further details of mitigation and control measures related to civil works within contaminated soil."

Department of Finance – Icon Fibre - David Eefting	Confirming that the project looks like it has no impact to existing ICON and DDTS infrastructure.	Duly Noted
Development Assessment - Richard Davies	A. The Heritage and TCCS comments will significantly inform the Authority's assessment for this development. It is noted both have provided feedback. Similarly see Impact teams comments regarding the ESO.	A. Duly Noted B. Town Planner has confirmed Compliance.
	B. The subdivision layout does not raise any obvious functionality issues although it is noted other entities/EPSDD have picked up on certain elements to be addressed. The Territory Plan including the Inner South District Policy has specific elements to be addressed for the DA when made. The Design Outcomes report (and matching plans etc) will need to address these TP requirements including potential any future development elements/outcomes established by the subdivision. It is also noted the Territory Plan GFA limitations for the site.	C. Noted, to be addressed in Built Form DA D. Noted, 2nd tranche included in the program.
	C. The building massing will be assessed more in detail at the relevant stages and individual DAs. Initial concerns are raised for 'self' overshadowing and therefore solar access to lower residential uses shaded by proposed northern elements. Detailed assessment information will be required at relevant DA stages. Consideration of stepping upper elements and/or reduced massing is recommended.	
	D. The subdivision DA will be "significant" therefore subject of 2 public notification periods under the Planning Act 2023. The second notification will commence soon after the applicant's submission to the Authority responding to entity comments and representations from the 1 st notification period.	
Development & Implementation - Roshan Bhandari	 A. Information around the yield and mix of uses will assist in determining servicing, parking and future intensions for the site. B. Information pertaining to stormwater management, including considerations regarding the direction and flow of stormwater 	A. Building development and use on block is indicative, subject to future design and siting DA. Indicative building footprints and GFA have been provided, servicing indicatively within block is based on approximates of this.

	towards the lake, as well as the associated water quality management practices.	B. The stormwater layout considers existing site falls and drainage points; the proposed design intends to retain existing drainage points. Water quality treatments are proposed to improve water quality discharges. Refer WSUD masterplan CC-0-113-003
Education Directorate - Krystal O'Callaghan	We have no comments to provide.	Noted
Environment Protection Authority - Angela Challis	The Office of the Environmental Protection Authority (EPA) provides the following comments: Contamination A. The site has been assessed, remediated, and independently audited and was found to be suitable for the "use(s) permitted by its zoning 'CZ-5 Mixed Zone'". EPA endorsement of the audit findings in 2021 is attached. 20210630_Section_4 9_Heritage_Area_SAS_ B. The development will be subject to compliance with the environmental management plans specified in the attached endorsement letter. Construction C. All works must be carried out in accordance with "Environment Protection Guidelines for Construction and Land Development in the ACT, August 2022" available at ACT Environment Protection Guidelines or by calling 132281. D. An Erosion and Sediment Control Plan (ESCP) must be submitted to and be endorsed by the EPA prior to works commencing on site. Any subsequent changes to the ESCP must be endorsed by EPA prior to implementation. E. All sediment and erosion control measures shall be in place prior to commencing works and shall be maintained until development completion. F. Adjacent roads shall be swept clean at all times.	Contamination A. Combined response for comment 20, 24 and 25, which relates to the need to comply with EPA guidelines. As part of that, the proposal must align with the contamination ESO requirements. For instance, the cut and fill drawings will involve excavation works, which must be undertaken in accordance with the protocols outlined in the contamination ESO. These requirements will need to be clearly reflected in the drawings. NH/Arup: Proposed note to be included on relevant plans: "Note: this drawing acknowledges the requirements detailed in EPA Endorsement Letter dated 30.06.2021. Refer to the Development Environmental Management Plan (reference PS103124-CLM-REP-101 RevF, dated April 2021), for further details of mitigation and control measures related to civil works within contaminated soil." B. Combined response for comment 20, 24 and 25, which relates to the need to comply with EPA guidelines. As part of that, the proposal must align with the contamination ESO requirements. For instance, the cut and fill drawings will involve excavation works, which must be undertaken in accordance with the protocols outlined in the contamination ESO. These requirements will need to be clearly reflected in the drawings. NH/Arup: Proposed note to be included on relevant

- G. For sites greater than 1 hectare, sediment control ponds must be incorporated during the construction phase of the development until 85% of the site is stabilised. Pond construction should be in accordance with the following guidelines:
 - Be of adequate size to control all runoff from the site.
 - No discharge from dam unless sediment level is less than 60mg/litre. If sediment level is greater, then prior to discharge, the dam must be dosed with either Alum or Gypsum and allowed to settle until the sediment is less than 60 mg/litre.
 - Water level must never exceed 20% capacity to ensure there is runoff storage during a rain event.
 - Regular dredging of the dam must be carried out to remove silt.
 - Site drawing and details must be provided to the Environment Protection Unit, Environment ACT for approval prior to works commencing.
 - Temporary Erosion & Sediment control ponds must be incorporated into each stage of development.
 The size of the ponds must be a minimum of 190 cubic metres per hectare and the temporary ponds shall not be removed until 85% of the developments are complete or all the disturbed areas are stabilised. The lessee shall comply with the Environment Protection Act 1997 and all relevant policies and guidelines.

Excavation

- H. All excavations that collect rainwater during a rainstorm event would be considered a sediment control pond and must meet the following condition:
 - No discharge from pond unless sediment level is less than 60mg/litre.
 - If sediment level is greater than 60mg/litre, prior to discharge, the pond must be dosed with either Alum or Gypsum and allowed to settle until the sediment is less than 60 mg/litre.

plans: "Note: this drawing acknowledges the requirements detailed in EPA Endorsement Letter dated 30.06.2021. Refer to the Development Environmental Management Plan (reference PS103124-CLM-REP-101 RevF, dated April 2021), for further details of mitigation and control measures related to civil works within contaminated soil."

Construction

- C. NH/Arup: Proposed note to be included on relevant plans: "Note: this drawing acknowledges the requirements detailed in EPA Endorsement Letter dated 30.06.2021. Refer to the Development Environmental Management Plan (reference PS103124-CLM-REP-101 RevF, dated April 2021), for further details of mitigation and control measures related to civil works within contaminated soil."
- D. ESCP to be submitted and endorsed by the EPA before works commence on site
- E. To be stipulated in the CONSTRUCTION CONTRACT
- F. To be stipulated in the CONSTRUCTION CONTRACT
- G. To be stipulated in the CONSTRUCTION CONTRACT

Excavation

H. To be stipulated in the CONSTRUCTION CONTRACT

	General Noise I. Building work, by its nature, is noisy. In the identified area and when the building work will take longer than two weeks, any noisy activities that include material deliveries and work site preparation are only permitted between the following hours: — 7:00am to 6:00pm, Monday to Saturday — At all other times, noise emissions must not exceed the zone noise standard. J. Noise from proposed infrastructure and plant after construction must comply with the noise Zone Standards at the boundary of the property at all times. It is recommended this be outlined in a basic Noise Management Plan detailing how the proposed will achieve compliance with EPA standards. For further information, please contact the Environment	General Noise I. To be stipulated in the CONSTRUCTION CONTRACT J. NMP is suitable from a planning perspective. Additional detail will be developed as the design progresses.
Emargancy Sarvicas	Protection Authority Planning Liaison at EPAPlanningLiaison@act.gov.au .	CC-0-113-005 documents the minimum that will be provided
Emergency Services Agency - Jo Nadin	Kingston Arts Precinct Signed.docx SES DA Response KINGSTON-12-49 - KINGSTON-14-49 - Template - KINGSTON Dam.pdf Dam.pdf KINGSTON-15-49 - Dam.pdf	according to Icon's charter. Based on early consultation with ACT Fire and Rescue, the precinct wide plans have integrated access requirements for emergency vehicles. This will be refined as the design progresses. Note proposed building layouts are indicative only and subject to future design and siting DA
Evoenergy - Chandika Dassanayake	A. Evoenergy would like to understand the scope and the timing of the development to define expected maximum demand and network augmentation to be done to supply the development as limited spare capacity is available in the existing 11kV network in the vicinity.	A. Project timelines, expected maximum demand and network augmentation to be discussed with Evoenergy through consultation. Works associated with this DA are

- B. The developer must conduct an earthing study in consultation with Evoenergy to identify earthing related hazards at Telopea Park zone substation under all possible fault scenarios. This included determining the system response to all cases which will result in an earth potential rise at or near equipment. The earthing system study report must submit to Evoenergy's endorsement with proof of calculations to ensure that voltage hazards within existing and future development areas are appropriately managed.
- C. There appears to be removal of ~0.8 to 0.5m cover from the existing 11kV cables entering the substation from the southwest substation boundary and existing electricity network assets within the block to be relocated to accommodate the development.
 - The developer is required to submit a Preliminary Network Advise (PNA) application via Evoenergy website.
 - Any relocation works must ensure that Evoenergy retains all existing and potential future value available from its existing assets.
 - Ratings of relocated sections of network are to be equal or better than the design rating for the original section of network, or the achieved installed throughput rating, whichever is the greater.
 - Any proposed alteration to ground levels over any underground mains can have a significant impact.
 Therefore, the details of any proposed alteration of levels that will adversely impact Evoenergy's assets should be submitted to Evoenergy for assessment.
 Raising the ground level may decrease heat dissipation and reduce the rating of the cables and lowering the ground level will reduce the amount of cover and make the cables vulnerable to damage and/or increase risk to the public.
 - The relocated network will be installed with adequate clearances from other existing network infrastructure to ensure the ratings of that infrastructure are maintained.

- expected to be completed over a 6 / 12 month period starting in Q1 2026.
- B. Duly noted, for inclusion in future DA package in consultation with EvoEnergy
- C. Ongoing EvoEnergy coordination.
- D. Duly noted, for inclusion in future DA package in consultation with EvoEnergy
- E. Discussed in meeting 27/5/25 between KAP Project team and Evo. Arup presented approach to include non-habitable space of the logistics zone / waste storage hub within the indicative 10mm offset from the substation. Arup presented the context and reasoning of this approach with the existing site conditions including some small blast walls. New construction is proposed to follow required construction codes. Project team requests the existing blast studies for this area and details of the 2022 blast walls from Evo. Evo to provide confirmation on blast wall requirements given the context.
- F. Response as above. Discussed in meeting with Evo Energy. Refer PNA ID 292 dated 15 Oct 2024. Receipt number 1142198.
- G. Duly noted, for inclusion in future DA package in consultation with EvoEnergy
- H. No works within the proposed substation block boundary are proposed. The proposed block boundary has been updated in the SDA package.
- I. Ongoing EvoEnergy coordination to confirm easement location.
- J. It is not the intention of the SDA to relocate alignment of 11kV or 132kV into Eastlake Parade.
- K. Duly noted.
- L. Comment acknowledged, proposed trees, landscaping and services layout within the block boundaries are shown only indicatively and are subject to a future DA in consultation with EvoEnergy.

- The relocation works will not affect the cost and feasibility of options for likely future network development. This includes access to future routes or substation sites that would be impacted as a result of the relocation.
- The functionality of secondary systems, such as protection systems, optic fibre and pilot cable network is to be maintained.
- The developer responsible to consult other parties affected by the asset relocation to obtain their written agreement and notify Evoenergy when this has been done
- It is responsible of the developer to make suitable arrangements (including funding) with individual customers to organise alterations to their individual service connections if they are affected by the proposal.
- D. The developer needs to conduct a substation fire and blast study in consultation with Evoenergy for the proposed development and submit to Evoenergy for endorsement.
- E. Minimum buffer zone around Telopea Park zone substation to be defined in consultation with Evoenergy. Buffer zone for the zone substation must take into account factors including but not limited to the following:
 - the necessity to achieve statutory clearances;
 - Asset security;
 - structural stability;
 - consideration of safety issues arising due to induced voltages;
 - consideration of safety in the event of an asset failure;
 - consideration of safety issues arising due to the flow of earth fault currents;
 - access for maintenance and construction;
 - future construction requirements;
 - environmental requirements;
 - refurbishment allowances.

- F. As per drawing AR 0110-005 Rev 01, Evoenergy observed that, waste storage (min 200sqm) has been proposed closer to the Telopea Park ZSS wall. Evoenergy understanding is this storage located in the potential buffer zone, that will not be compliant with the earthing, substation fire & blast study results. Therefore Evoenergy request the developer the to reconsider the particular waste storage location or other mitigations that may be required.
- G. Evoenergy require to include optical fibre conduits and pits within the development area that must comply with Evoenergy standards. The developer must share design drawings for Evoenergy comments.
- H. Evoenergy needs conformation that, no modification to be done for the existing substation boundary walls with the proposed development.
- I. New constructions or alterations are not allowed within the easement of 132kV underground cable.
- J. Verge along Eastlake Parade should be widened to make provision for the 11kV and 132kV asset that to be relocated from the block and maintain minimum separation requirements with other services .
- K. 132kV underground cable jointing bay locations to be confirmed after completion of detail design of Causeway switching station decommissioning project.
- L. As per drawing, AR 0110-003 Rev 01, shows tree canopy on existing underground cables. Evoenergy would like to clarify if trees or shrubs offer canopy on the southern side of Telopea between the parking area and Telopea ZS wall. No trees should be planted over the existing underground cables.

Health Protection Service - Gemma Parker	The Health Protection Service (HPS) notes that the draft includes the proposed subdivision of Section 49 Block 15 into four new blocks, adjustment of Section 49 Block 12 boundary around the Powerhouse, establishing three key planning controls for the subject site, verge upgrades and on-site clearance, removal of services, and grading to have the estate ready for the Major Works stage of development, subject to future Development Applications (DAs). There are no public health concerns at this stage in relation to the draft.	Noted
Icon Water - Nabin Dahal	 Please see Icon Water response on water and sewer master plan: Provide detail of existing and proposed water main including material and size. Water master plan should show the responsibility line based on block boundary. Water service and fire service table is not complete. Master plan should show the connection point to all future blocks to confirm capacity in existing water network. Sewer master plan should show the responsibility line based on block boundary. Provide detail of existing and proposed sewer main including material and size. Icon Water requires separate easement for water and sewer main. Masterplan should show each easement clearly with dimension. Earthing report will be required to confirm sufficient clearances between proposed assets and existing substation. Long section for both proposed water and sewer main will be required to confirm vertical clearance from other assets. Provide cross section to confirm clearances between water & sewer main from other assets including trees. 	Discussed in meeting with KAP Project Team and Icon 3/6/25. Proposed scope for SDA includes works within verge and street and water meters and connections within boundary. The proposed layout thereafter within block is subject to further design and DA.

	 Detail of development is required to confirm water and sewer capacity. Upgrade of existing mains may be required. Water and Sewer Capital Contribution charge will be applicable for this development. This charge is payable before connection. Clearance between proposed tree and existing water and sewer main is required to confirm if its acceptable. 	
Impact Assessment - Hayden Pini	Blocks 12 and 15, Section 49 in Kingston are included on the register of contaminated sites under the <i>Environment Protection Act 1997</i> and therefore trigger the requirement for environmental impact assessment under Schedule 1, Part 1.2 Item 23, of the <i>Planning (General) Regulation 2023</i> . On 17 April 2023 the planning and land authority (now known as the territory planning authority) granted a conditional Environmental Significance Opinion (ESO202300003) in relation to construction, on Blocks 12 and 15, Section 49, Kingston, of a mixed-use precinct that includes a range of public, arts and private spaces, including: • new buildings for arts organisations, including retail spaces, artist accommodation and open events space; • public spaces; • public carparking; and • spaces for residential dwellings and other permissible uses to complement the surrounding Kingston Foreshore and broader Kingston area. A copy of ESO202300003 is attached to this email and has also been submitted with the Draft Major Subdivision (Estate) for the Kingston Arts Precinct.	Contamination ESO is submitted and approved, Heritage ESO is submitted and under review.

As identified on the <u>ESO webpage</u> on the planning.act.gov.au website, ESO202300003 expired on 20 October 2024. Blocks 12 and 15, Section 49 in Kingston are still included on the register of contaminated sites. Therefore, prior to submitting a development application for the proposal, the proponent is required to obtain a new ESO from the territory planning authority indicating that the proposal is not likely to have a significant adverse environmental impact.

As Blocks 12 and 15, Section 49 Kingston are also identified heritage registered places, the proponent should seek advice from ACT Heritage to confirm if an ESO under Schedule 1, Part 1.2 Item 21, of the *Planning (General) Regulation 2023* is also required. At the time of preparing ESO202300003, the territory planning authority was of the impression that the proponent would be submitting a separate ESO application for heritage related matters, but I am unable to find a record of this on file or in the documentation submitted with Draft Major Subdivision (Estate) for the Kingston Arts Precinct.

The proponent can contact the Impact Assessment Team at EPDImpact@act.gov.au should they have any questions.

Infrastructure Canberra

- Nicky Cootes

As the proposed custodian of the territory assets, it is preferred that all territory assets both existing and proposed be consolidated to one block. Territory assets consisting of the Powerhouse, the former transport depot, the fitters workshop, and the switch room, excluding the multi-story carpark which is to have its own block and section identifier.

This can be achieved by subdividing Section 49 into 4 blocks being a parcel of land for divestment, the multi-story carpark, the substation and a territory asset block. Within the territory asset block by collapsing the boundaries around block 14 the former transport depot, block 12 the Powerhouse and block 37 the switch room would provide iCBR with one parcel of land to manage.

Comment noted, the boundary around block 12, the Powerhouse and block 37, the Switch Room have been collapsed however the boundary to block 14, the Former Transport Depot has been retained due to contamination constraints.

Block 37 is a proposed block and not registered. We are only reflecting changes to Registered Blocks.

	iCBR has concerns about the proposed approach to value management for the project and the lack of a revenue source to contribute to the ongoing maintenance of infrastructure once constructed.	
Jemena - Andrew Moore Land Supply	A. Jemena has reviewed the location of the Development Application and undertaken a review of the documentation provided. Please note this must comply with the ACT Government regulations & Development/Building Approvals https://www.legislation.act.gov.au/View/a/2010-41/current/html/2010-41.html B. Jemena has no objection to this development application if it meets these requirements. It is noted that there is a gas network in the vicinity however, all care is to be taken around our underground assets & please Please ensure appropriate Before You Dig Australia (BYDA) processes are followed as part of the construction process. If a meter relocation or service pipe relocation is required, you must comply with Evoenergy standards please contact your gas retailer, only people accredited by Evoenergy can carry out this work. - Comments provided through Development & Implementation	 A. Climate Change and Greenhouse Gas Reduction Act 2010 at this stage of SDA would not be triggered. Would be beneficial to seek further clarification. B. To be stipulated in the CONSTRUCTION CONTRACT
Leasing Services - Aaron Oshyer	The subdivision of Block 15 Section 49 Kingston is proposed to create four distinct land parcels, each with specific purposes: a Territory-owned arts precinct, a mixed-use residential land parcel, a multilevel car park block and a substation block which cordons off the existing substation asset. Additionally, the boundary of Block 12 Section 49 Kingston will be adjusted on the southeastern corner to better accommodate the Powerhouse expansion and improve opportunities for further development on this block, enhancing its functionality and development potential.	This will be undertaken as part of the leasing process during SDA assessment.

	The Power House is an Executive Crown lease and will need to be consolidated with the additional land. Provided the additional land is unleased, the consolidation can be done through an Authorised Plan and a surrender and regrant of the Crown lease process. We have no further comments on this proposal.	
National Capital Authority - Joseph Sutton	 A. The NCA has no objections with the proposed subdivision and site layout. B. The NCA requests that future development applications consider the Kingston Foreshore Special Requirements under Section 4.26 of the National Capital Plan. The NCA has some concern the height and length of some buildings on indicative plans may detract from the massing of the Kingston Powerhouse building. Building length requirements are not included in the Kingston Foreshore Special Requirements, but were considered in the Planning Report. Considering building length provisions from the City and Gateway Corridor as a guide for future building design might ease concerns about larger buildings detracting from the mass of the Powerhouse building at future stages. C. The NCA supports the indicative increase of soft landscaping on Wentworth Avenue. 	 A. Duly noted B. Detailed will be ironed out at Main Works stage. Heights at this stage of SDA are indicative C. Duly noted
NBN - Kenny D'Cruz	If there's a future requirement to determine the location of nbn's infrastructure or a relocation/impact assessment, you will need to perform the below; • Submit an application, for nbn's plans, via "https://www.byda.com.au"; • Engage an accredited plant locator to determine the physical location of nbn's infrastructure; • Record the physical location of nbn's infrastructure; • Overlay your planned construction work against nbn's located infrastructure;	Duly noted, Design Engineers assumes no additional information required at this stage.

	 Determine if nbn's infrastructure will be affected by your planned work; and Submit a construction plan to https://www.nbnco.com.au/develop-or-plan-with-the-nbn/relocation-works illustrating the area where nbn's infrastructure may be affected. 	
Office of the Surveyor - General and Land Information - Joanne Hawkes	 OSGLI comments are: A. Block 12 Section 49 Kingston has no road frontage, an access easement may be required. B. After the development is approved, the developer/Lessee should contact DigitalData@act.gov.au to formalise addressing for the site. C. Given there are no new roads, only a private access road, no formal naming instrument is required from Place Names. Should the developer wish to name the access road, Place Names could review any potential name for uniqueness and to avoid duplication for service delivery and emergency services. D. Ensure assets are protected by easements in gross where required by the service provider E. It is an offence to destroy a survey mark unless authorised by the Surveyor-General pursuant to section 53 of the Surveyors Act 2007. a. Please include a provision for the preservation of survey infrastructure as part of the development. 	 A. Different access setbacks to Powerblock have been provided for these access reasons, distributed in the subdivided blocks. Please see commentary 11 and 12. Final SLA strategy. Commentary noted. B. This is actioned once the DA is approved. C. Duly noted D. Co-ordination with EVO required E. To be stipulated in the CONSTRUCTION CONTRACT
Sport and Recreation - Simon Dolejsi	We have no comments to provide.	Noted
Strategic Planning & Policy - Gisela Copioli Barrera	We have no comments to provide.	Noted
TCCS Development Coordination	Traffic: Please see below compiled TAM team comments on the KAP TIA. Comments in bold are inputs from Roads ACT and the Active Travel	TCCS Transport Assessment and Modelling (TAM) Team Review of KAP TIA prepared by Arup dated 20/12/24

- Rashed Yamin

team are required which relate to proposed infrastructure upgrades and mitigation measures.

TCCS Transport Assessment and Modelling (TAM) Team Review of KAP TIA prepared by Arup dated 20/12/24

- A. General Please submit all SIDRA files for TCCS review. In addition, please include the SIDRA outputs including site layout, movement summary, lane summary and phasing summary as an appendix to the report.
- B. Section 2.3.2, pg. 5 Why wasn't the most recent crash data up to December 2024 when the report was drafted analysed. The crash data analysed is up to the year 2022. The dates of the crash data analysed are also unclear. Is it from 1st Jan 2012 to 31st December 2022?
- C. Section 2.3.2, pg. 5 Information of the types of crashes are missing in addition to any safety concerns that likely resulted in the crashes.
- D. Section 2.7, pg. 10 It is understood the 2016 Census was used to understand travel behaviour and mode share. How does the data compare to the 2021 Census and why wasn't the 2021 Census used? In addition, the 2022 Household Travel Survey can be used to understand mode share and travel destinations. Link to the survey here:

 https://www.transport.act.gov.au/planning-for-the-future/household-travel-survey
- E. Section 2.8.4, pg. 14 Please submit SIDRA files and include SIDRA outputs in the appendices. In addition, how was the existing conditions SIDRA models calibrated? E.g. Were queue length surveys used to calibrate/validate the model?
- F. Section 3.2, pg. 18 How will the development integrate with existing public transport infrastructure to ensure efficient access for residents and visitors, and are there any planned improvements to bus routes or stops?
- G. Section 3.2.2, pg. 19 Have the access points been assessed against safety? For example, does the Wentworth Avenue access point require a deceleration lane?

- A. SIDRA files will be forwarded.
- B. Noted. Updated crash data will be provided at detailed design phase and any improvements required will be incorporated where feasible. A review of the 2023-2025 available crash data reveals six crashes involving injuries on Wentworth Street, Eyre Street, Dawes Street and Eastlake Parade (ie within close proximity of the site). One of these incidents involved a pedestrian, and the remaining involved vehicles. These incidents do not follow any discernible pattern. 27/5 Meeting this to be updated within report for resubmission.
- C. Duly noted
- D. 2021 Census data is not considered representative due to COVID. Census data is considered more representative than Household travel survey as it considers a larger sample.27/5 Meeting: Arup to with compare TIA with Household Travel Survey produced by TCCS
- E. SIDRA files will be forwarded.
- F. As detailed in 4.7 there are minimal impacts to public transport as a result of the additional traffic generated by the proposed development, and therefore no impacts to the operation of existing bus stops are expected.
- G. Highway design will be explored at detailed design phase. 27/5 Meeting: TCCS: Since there will be future DAs after this SDA, TCCS may be able to condition this to have it assess at future DA, TBC.
- H. Duly noted
- I. As detailed in 3.6.3 the peak parking demands of nearby sites were analysed in a separate assessment which totalled 430 spaces. The development itself would provide 556 spaces and therefore accommodate parking demand for nearby uses.
- J. The office and commercial trip rates are sourced from GtTGD (RTA, 2002), the retail trip rates are based on TDT2013/14A (RMS, 2013), and the residential rates are

- H. Section 3.5.1 and 3.5.2, pg. 22-23 Under the current Planning Act 2023, the required bicycle parking is outlined in the Commercial Zones Technical Specifications. The Bicycle Parking General Code is no longer in effect.
- I. Section 3.6.3, pg. 26 How will the relocation of existing car parks impact the surrounding developments in the Kingston Foreshore Precinct and are there any plans to coordinate with nearby developments to manage the overall parking demand and supply in the area?
- J. Table 12 and Table 14, pg. 28-30 For each land-use, please outline the source of the trip rates and the inbound/outbound factors.
- K. Section 4.4, pg. 30 In the Trip Distribution section (Section 4.4), the study has assumed various inbound/ outbound split percentages "... based on the proportion of car parking provided in the site ...". Although the 'car parking location & provision' may provide trip distribution to some extent, it cannot provide accurate splits for the wider network context. The TIA study should refer relevant reports such as the ABS Census Journey to Work data (2021) to identify the trip proportions originating and destinated to/ from the Kingston area.
- L. Table 17, pg. 31 Commentary above Table 17 outlines that trip distribution was assumed. Why was this not based on census data, the 2022 Household Travel Survey or CSTM Origins/Destinations?
- M. Section 4.5, pg. 31 As part of the TIA analysis (Section 4.5), the combined traffic from the development and future base years was considered and intersection analysis was carried out (using SIDRA) for all specified sites. Although this approach is reasonable, this alone doesn't provide the 'actual' traffic impact caused by the development itself (not just general traffic). Therefore, it is strongly suggested to undertake analysis with 'future base year ONLY' traffic and then compare with the 'future base year + development' scenario, to answer the key questions such as:

- based on ACT Engineering Advisory Note (EAN 14). The trip rates were refined and agreed with TCCS in 2024.
- The inbound and outbound distribution for community centre, cultural facilities and theatre were determined on parking spaces, assuming 100%/ 10% AM, 100%/ 10% PM and 100%/ 50% weekend. The residential and office inbound and outbound distribution used 20%/ 80% in AM, 80%/ 20% in PM and 50%/ 50% at the weekend. The remaining retail and artist accommodation inbound and outbound distribution was 50%/ 50% for AM, PM and weekend.
- K. The 2021 census data is not considered to be accurate due to COVID and therefore the trip distribution has been based on the most recent and accurate data available, ie the car parking proportions site accesses.
- L. The traffic distribution was based on the most recent and accurate data available, ie the car parking proportions site accesses.
- M. As detailed in Table 18, 2027 future base (no development) and 2027 future base plus development scenarios have been proposed for each intersection. The difference can be subtracted from the two to see the impact and increase from the proposed development only.
- N. Queuing analysis to be forwarded
- O. Comment acknowledged. 27/5 Meeting: TCCS Will forward to RoadsACT for confirmation of scope.
- P. Comment acknowledged. 27/5 Meeting: TCCS Will forward to RoadsACT for confirmation of scope.
- Q. Travel surveys may be undertaken to track any changes or trends in travel behaviour by analysing trip purpose and mode of travel. The implementation of measures from the Green Travel Plan will encourage sustainable travel. These measures will include education, promotion of public transport and active travel, car park management, carpooling and working from home.

- How much traffic impact will the development alone cause onto the surrounding road network?
 What is the contribution? Will be it be a significant?
- How much traffic impact will the general traffic cause likely to cause?
- N. Section 4.5, pg. 31 Was queuing analysis undertaken at the site access points? If not, please undertake queuing analysis as per AS2890.1 in addition to the traffic modelling analysis.
- O. Section 4.5.1.1, pg. 35 Wentworth Ave/ Eastlake Pde/ Telopea Park upgrade:
 - It is understood that this site is expected to experience operational issues in the 2032 PM peak (as per Table 19, pg. 33). During this period, this intersection is likely to reach to its practical capacity (DoS – 0.98), delays over 1 min, compromised level of service (LoS E), and extensive queueing up to 500m.
 - As such the study has proposed a left-turn slip lane on the Wentworth Ave eastbound, which shows to improve the intersection operation to LOS D and reduced the queueing congestion to 220 m max.
 - From the traffic analysis/ modelling perspective, this proposal seems to have merits. However, it is strongly recommended to discuss with Roads ACT on the practicality and feasibility of such upgrade from a civil design, traffic management, and signals operation perspective. TCCS Active Travel team will also need to be consulted regarding the left-turn slip lane as this will have implications for pedestrians and cyclists.
- P. Section 4.5.2, pg. 37 Causeway Precinct:
 - When considering the Causeway Precinct, the analysis indicates some intersections along Wentworth Ave such as Giles St and Eastlake Pde are likely to experience heavy congestion with

Monitoring the travel surveys will determine if further intervention is required to achieve more sustainable mode shares.

- 750m 850m queueing, and over capacity (DOS > 1.0), and over 2 min delays.
- Hence, the study has made recommendations such as active travel/ mode shift encouragement, removing the median lanes at Eastlake Pde signalised intersection, and providing additional lanes on Wentworth Ave. These mitigation measures need further discussion with TCCS Active Travel Team and Roads ACT.
- Q. Section 5.3, pg. 42 How will the periodic travel surveys be designed to effectively capture the travel behaviour of tenants and the success of the Green Travel Plan measures, and what specific criteria will be used to evaluate performance?

Traffic Signals – Roads ACT

From a signal's perspective, TCCS would not have any issue with this as it will only serve to improve the performance of the intersection.

It's suggested that the proponent ascertain whether the extension of the slip lane is feasible financially given there is a Telstra pit located where the slip lane extension would be. Services may also be under the verge which will need to be relocated for the slip lane extension.

<u>Traffic Signals – Roads ACT</u>

Comment acknowledged, the project will work closely with TCCS during the detailed design phase.

4.5.1.1 2032 plus development scenario – with upgrade

To improve performance of the Wentworth Avenue / Eastlake Parade / Telopea Park intersection in PM peak hour in the 'plus development' scenario, the provision of an additional left-turn short appropriate that the west approach could be considered. This upgrade layout is shown in Figure 23.

NH Architecture Pty Ltd 294419-00 | Rev 01 | 20 December 2024 | Arup Australia Pty Ltd Kingston Arts Precinct Traffic Impact Assessment



Figure 23 Proposed upgrade at Wentworth Avenue / Eastlake Parade / Telopea Park intersection (marked in

TREE

Urban Treescapes (Design and Development Coord) have reviewed the submission for **Kingston Arts Precinct – Draft Major Submission,** and give in principal support for the proposal provided the following for tree protection on unleased land is addressed:

A. Please confirm if new services are proposed along Eastlake Parade and show on the TMP, including Pipe Protection Envelope (PPE). There are many civil drawings that are already fairly advanced and TCCS want to ensure that trees (existing

Trees

A. For further discussion with TCCS. Engagement with TCCS is underway to further resolve TMP coordination. On block work will be undertaken as part of future DAs.

Existing and proposed services can be shown indicatively on Verge Works Plan.

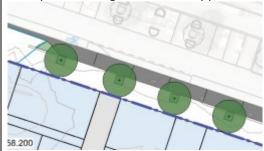
There are some minor adjustments to sewer on Eastlake. In the future there may be further adjustments to comms connections but the final location and detailing the of connections would be developed in subsequent stages once the connection points are finalised as part of future DA.

27/5 Meeting: Amend verge works plan to overlay services for the purposes of Authority review of potential clash between services (existing and proposed) and trees (existing and proposed).

Part of this SDA requires ALL services to touch block boundary. If we are seeking proposed services approval in this SDA it will be shown. Otherwise it is not seeking approval and part of future works."

- B. Amend Tree management plan to include trees retained, removed and proposed to verge. To adjacent blocks trees retained and removed to be tabulated, with trees proposed to be indicative subject to future DA.
 Issues of tree removal need to reflect SDA scope. If trees are removed from territory asset as part of this SDA, tmp will reflect this. Canopy contribution will be impacted.
- C. Amend drawings to indicate no works to northwestern section of Eastlake Parade; existing trees and footpath to be retained.

- and proposed) are thoroughly coordinated with services for long term canopy sustainability and asset protection.
- B. Please add total number of trees to be retained, removed and proposed to the 'Indicative Tree Canopy Plan' dwg LA-0-110-003. Retention of healthy, valuable street trees will be a priority for TCCS and unlikely to be supported.
- C. Please consider permeable materials to the north-western length of Eastlake Parade to allow street trees better access to water.
- D. Please confirm Available Soil Volume targets (ASV) (refer to MIS 25) are being achieved. TCCS request a plan that demonstrates ASV volumes for all verge trees.
- E. Confirm if strata vaults or structural soil will be used. In future rounds of documentation please clearly indicate the extents of strata or structural soils.
- F. Any existing or proposed services will need to be captured on plans and sections to coordinate clearances early. In addition to standard clearances, it is also important to consider PPE (Pipe Protection Envelope) for Icon Water assets as many Icon clearances are measured from the outside of the PPE to trunk of tree.
- G. Tree pits along Eastlake Parade must be min of 2m x 2m. It appears there are opportunities to increase the tree pit or garden bed size to maximise growing conditions for new trees. Again, in this area, permeable paving should be maximised for optimal tree growth. See snippet below.



H. If pruning is required, to existing trees, the applicant will need to provide information about the proposed work for review and approval. Information must include photos indicating where the branches will be cut. Pruning must not be

- D. Amend drawings to include ASV to proposed trees, and negotiated tree species to southwestern section of Eastlake Parade (Zelkova serrata).
- E. Amend drawings to include proposed extents of structural soil to southwestern section of Eastlake Parade, including proposed verge section.
- F. Duly noted, detailed design will be completed in consultation with TCCS and Icon Water. 27/5 Meeting: Amend verge work plan to overlay services.
- G. 27/5 Meeting: discussed. Refer meeting minutes concern over conflict with carparking and low branches. TCCS offered additional offline conversation, a matter of identifying risks and mitigation of footpath configuration.
- H. Duly noted, no pruning is required at this stage of the works.

undertaken without written support from TCCS - Urban Treescapes.

ACTIVE TRAVEL

Following are some high-level comments:

- A. All consultants need to make themselves aware of the planned Active Travel routes documented in the new Active Travel

 Planning Tool which shows the network planned for around and through this site
- B. The provision of Active Travel Routes across the site isn't clear.
- C. The Active Travel linkages across the site appear to be using roadways (shared roadways?). Suggest that options for providing more separated infrastructure be explored
- D. It appears that the cross-site (north-west to south-east) appears to be a continuous roadway that could be used as a rat run. Suggest designing road loops rather than a continuous roadway (whether it's intended to be "shared" or not.
- E. North-western car park has no surrounding active travel linkages and appears to be intended to be a roadway rather than shared space. Provide paths to facilitate cross-site Active Travel movement mentioned above.
- F. Active Travel interface with Printers Way is unclear are footpaths provided and how will people move in and out of the site?
- G. Footpaths in surrounding verges are inconsistent widths. These need to be made consistent.
- H. The Active Travel "Routes" shown on drawing CC-0-111-004 are not correct. The plan notes infrastructure, not routes and

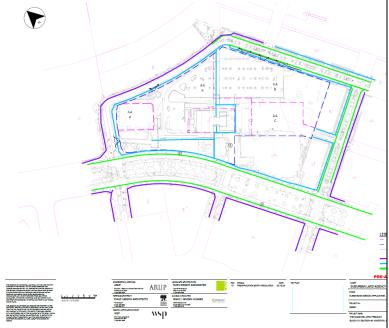
Active Travel

- A. Duly noted
- B. Figure 13 illustrates the proposed pedestrian and cycling routes through and around the site. As detailed on page 18 key cyclist access routes would be provided on Eastlake Parade and Printers Way and pedestrian access would be provided via several access points, with a zebra crossing on Eastlake Parade to connect to the northern end of the site.

The active travel routes will be refined at detailed design phase.

- C. The active travel linkages will be further developed at detailed design phase
- D. Roadway specifications will be refined at detailed design phase
- E. The active travel linkages to car parks will be further developed in detailed design phase
- F. The active travel interface with printers way will be further developed at detailed design phase
- G. The footpaths will be further developed at detailed design phase.
- H. The routes will be updated to match TCCS terminology at detailed design phase
- Highway design will be explored at detailed design phase. 27/5 Meeting: Drawing notes driveway design standard. Details of vehicle type to be added to drawings to clarify design assumptions.

needs to be updated to match TCCS terminology:



I. Driveway splays along Eastlake parade driveways appear to be very wide – narrow to ensure perpendicular Path interfaces.

Transport – Action Bus

The proposed relocation of the bus stop conceptually is accepted, as indicated during consultation meeting. The details and appropriate location with regards to distances to intersections will need to be negotiated with TCCS, to ensure compliance with appropriate MIS standards and other safety considerations.

Waste:

A. Waste proposal will need to comply with the DCC Waste Code 2019. At present, some of the proposed truck movements appear to have conflicts with kerbs, parking areas or may require more than a 3-point turn, which will not supported. Please ensure the design meets the expectations of the waste code and provides for safe movement for HRV within the

Transport – Action Bus

Noted - to be further developed and discussed with TCCS.

Waste

- A. Waste vehicles at the logistic road are under further detailed investigation but have been based on a 12.5m vehicle. The road design will be refined further in subsequent design stages.
- B. The road design will be refined further in subsequent design stages

Other

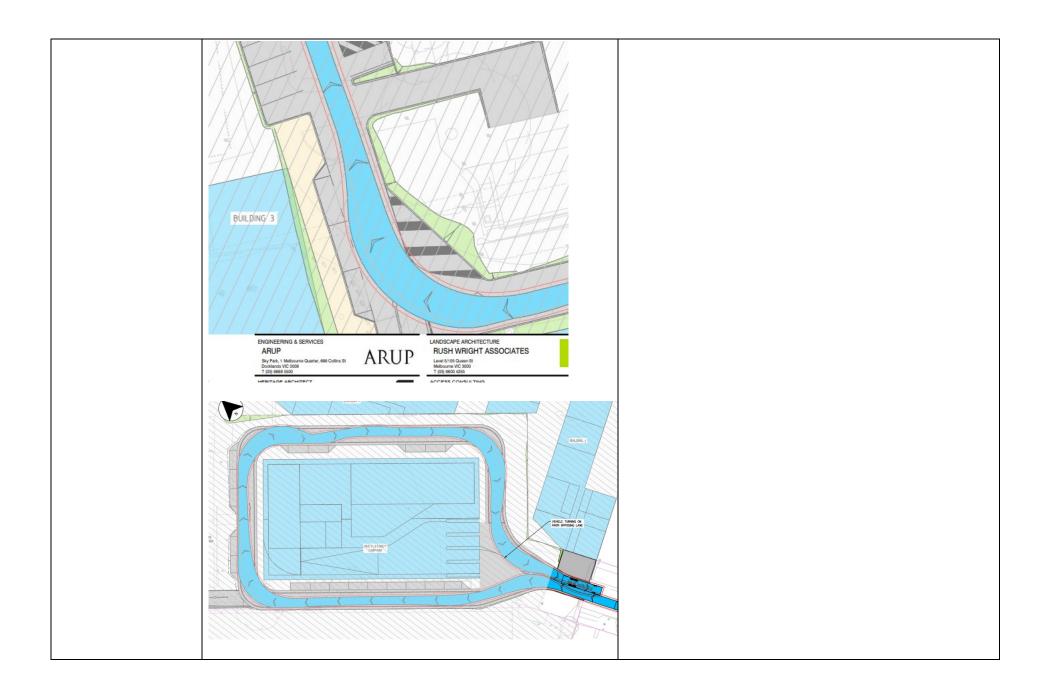
Duly noted

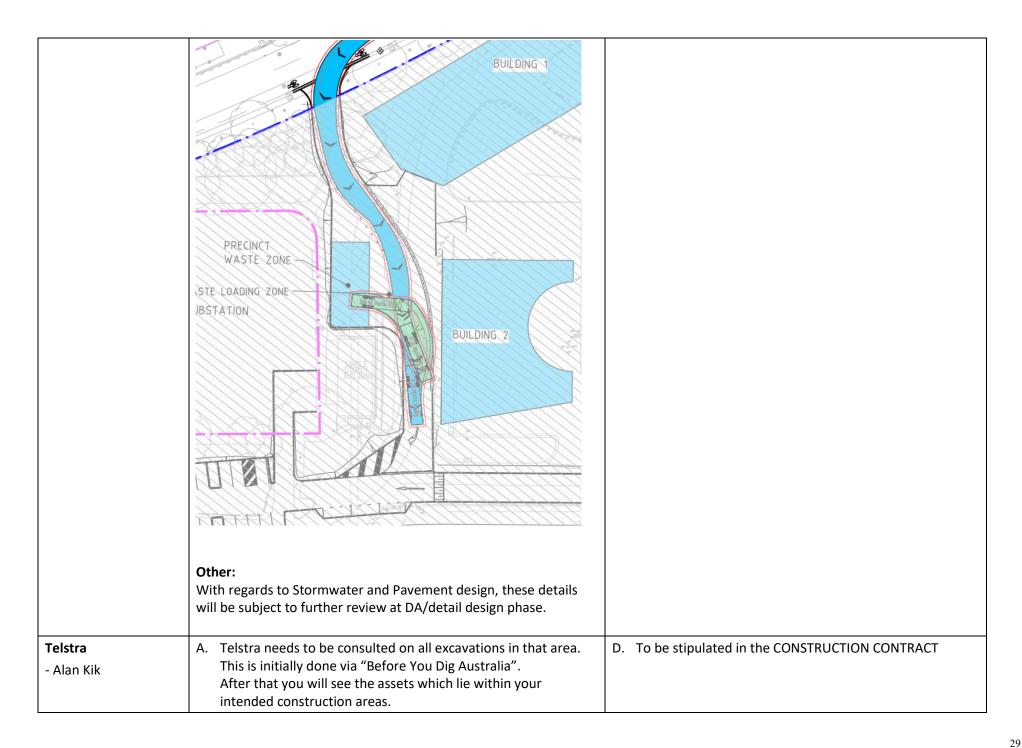
precinct. Where the proposal departs from the requirements, a justification under the Performance Based Solutions will need to be provided.

B. The proposed HRV truck movement/loop around the multistory car park at Printers Way entry is not ideal and needs to be further resolved.

Some ref examples re comments:







	 B. Please pay particular attention to any new installations of HV electrical networks. C. There is also a long notification time for any relocations as there are critical assets in the area that may need to be rerouted or relocated. 	 E. Detailed information has been requested in EvoEnergy PNA ID 292 dated 15 Oct 2024, receipt number 1142198. Awaiting response from EvoEnergy F. Independent access available to service each block. If required we can show an indicative connection from the nearest pit, but final detailing of connections would be developed in subsequent stages once the connection points are finalised. Can be further developed with TCCS
Territory Plan & Coordination Section	Territory Plan & Coordination Section has reviewed this proposal. The site (Block 15 Section 49 Kingston) is currently zoned Commercial CZ5 Mixed Use. The proposed uses for this site are suitable for this zoning. There are buildings in the development (Powerhouse, Fitter's Workshop and Switchroom) and associated items that have been considered appropriately due to their heritage listing and CMP for this historic precinct. The scale of the development proposed seems compatible with surrounding existing development with similar setbacks and heights. TP&C has no immediate issues of this proposal.	Duly Noted
TransACT (TPG) - Alan Sadler	We have cables within the site that will need to be relocated due to this work. (as shown on plan). We have cables running around the boundary of the site that may be impacted by the construction of new driveways on Eastlake Parade. (If impacted, they will need to be relocated.) We have wifi units on streetlights on Eastlake Parade that may be impacted by the new street scape. (If impacted, they will need to be relocated.) For any building that will be mixed use, we request 1x P100mm comms conduit into that building back to existing TPG/TransACT network. This needs to be dedicated for TPG/TransACT only. We can provide banded pit lids for any pits to be installed for us by the developer. Cable paths cannot be shared with any other carriers until we are in the building.	Independent access available to service each block. If required we can show an indicative connection from the nearest pit, but final detailing of connections would be developed in subsequent stages once the connection points are finalised. Can be further developed with TCCS

Happy to liaise/approve detailed design for TPG/TransACT conduit reticulation.	