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Standing Committee on Environment,
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Submission Cover Sheet

Inquiry into Petition 002-25: Hawker Village shops redevelopment

Submission number: 069

Submitter: Friends of Hawker Village

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COVERING PAGE, SCULLIN, WEETANGERA AND HAWKER

LA Committee on Environment, Planning, Transport and City Services

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Inquiry into Petition 002-25: Hawker Village shops redevelopment

Friends of Hawker Village Inc. (FoHV) is a voluntary, apolitical, community-based group established in 2010. Its purpose is to protect and enhance the residential, suburban, social and environmental qualities of the commercial precinct known as Hawker Village and the surrounding suburbs of Hawker, Page, Scullin and Weetangera. FoHV has a strong interest in promoting the best outcomes for the community when development changes are proposed. We advocate strongly for planning decisions which are made through appropriate processes and which are based on a clear and comprehensive understanding of all relevant issues.

Executive Summary

1. In 2023, the Woolworths Group Ltd announced its intention to apply for the Direct Sale of public land (totalling 7,104 sq.m.) at the Hawker Village shopping area in order to facilitate a major redevelopment which would involve significant changes to the Woolworths Metro supermarket, to a range of other shops and services and to parking arrangements.
2. FoHV believes that the nature and scope of any development at the Hawker Village shopping precinct should enhance, not undermine, the character, design efficiency, accessibility and functionality of this area. We believe that there are elements of the proposed redevelopment currently proposed by Woolworths in its Direct Sale Application which are not consistent with these criteria.
3. Particular concerns include the proposed loss of quick, convenient and accessible parking on the Springvale Drive car park (as noted in the present Petition). Traffic and noise associated with the proposed development would adversely affect nearby residents, including residents of the 21 apartments at the lower level of the shopping precinct and guests at the Belconnen Way Hotel and Serviced Apartments.
4. The Direct Sale process, as it currently operates, contains numerous deficiencies which disadvantage both the community and the Government in assessing the appropriateness of the sale of significant blocks of public land in established locations such as the Hawker Village shopping precinct. In particular, the process provides no public transparency

- regarding the Application and its supporting material; associated Government reports and documents; and the Government's decision-making process with regard to the application.
5. Woolworths' Direct Sale Application does not make a compelling case for the need for a full-line supermarket at Hawker nor does it reflect consideration of the demographics of the catchment areas. The current Woolworths Metro in Hawker is the only Metro on the southern side of Belconnen that is convenient for those with mobility limitations.
 6. Should shop-top housing be included in a revised application, even more careful consideration will need to be given to the implications for overall design, parking and the amenity of public areas.

Direct Sale process: inadequate transparency and community consultation

The Direct Sale process, in the present case, will need to consider:

1. the sale of public land for the purpose of facilitating a major redevelopment which would include replacing the current Woolworths' Metro supermarket with a full-line supermarket and replacing a large, open street-level parking area with basement parking, as well as the construction of additional buildings for shops and offices; and
2. a revised application, should Woolworths choose to include shop-top housing, as requested by the Minister for Planning in March 2025.

Deficiencies in the current Direct Sale process constitute barriers to ensuring that these matters are subject to a rigorous and carefully considered process. The Direct Sale application is not a public document even for significant blocks of public land. The Government is not even required to provide public notification of a Direct Sale application. The Woolworths Direct Sale Application and related documents were provided to FoHV in October 2024 in response to a Freedom of Information request. A summary of our response to those documents is attached to this submission.

The Direct Sale process might be appropriate for some areas of public land; however, it has deficiencies which make it particularly problematic with respect to the sale of significant blocks of public land in established locations such as a shopping centre in a residential area. A particular concern is that the Direct Sale process involves virtually nothing in terms of transparency, publicity or meaningful community engagement. This means that the initial and fundamental issue of whether the land should be sold for development, as opposed to what the development would consist of, is not subject to a systematic and prescribed process for public consideration and comment.

The Direct Sale process allows no opportunity for community scrutiny of and comment on the application and, hence, no way for the community to question the basis upon which Woolworths makes its claim for Direct Sale eligibility. The decision about Direct Sale eligibility and, hence, about progressing to the Development Application stage, is based entirely on internal Government processes, without the benefit of community input.

Inadequate community consultation has been a particular feature of the Direct Sale process with respect to the present Application. Community engagement activities undertaken by Woolworths were minimal and were not, in FoHV's view, consistent with the level of engagement and

consultation that would be expected for a proposal of this nature and size. Other than two poorly-publicised drop-in sessions conducted by Communication Link, the only information about the redevelopment proposals which was provided at the Hawker shops was distributed by FoHV. Many Hawker traders, including even some Woolworths staff, indicated to FoHV that they were unclear about what was being proposed.

It does not appear that Direct Sale applicants are required to comply with Consultation Guidelines prior to submitting a Direct Sale application. This allows a developer-driven community engagement process, with the prospective buyer having complete control over consultation design, implementation and interpretation. The resulting information has potential implications for Government decision-making.

In the absence of an independent consultation process, the approach to community consultation for Direct Sale applications for significant areas of public land should, at the very least, conform to the principles described in the Planning (Good Consultation) Guidelines 2023 (No 1). This is especially important given that the new Planning Act excludes the previous requirement for pre-DA consultation. FoHV believes that pre-DA consultation for significant developments should be required in the interest of achieving quality outcomes and minimising contentious issues at the DA stage.

In the current Direct Sale process, whatever form of community engagement the applicant chooses to conduct and report on, prior to submitting an application, is followed by internal Government consideration, with no opportunity for the community to view or comment on the application. This means that it is not possible for the community to question the basis upon which Woolworths makes its claim for Direct Sale eligibility, included purported public benefits.

The decision about Direct Sale eligibility and, hence, about progressing to the Development Application stage, is based entirely on internal Government processes, without the benefit of community input. Discussions are apparently held between the Government and the Applicant but not between the Government and the community.

The Communication Link community engagement report and a survey conducted by the Belconnen Community Council suggest that there is support for improvements to the Hawker shopping precinct but there is a lack of strong support for extensive redevelopment which would reduce accessible parking and erode the precinct's local feel.

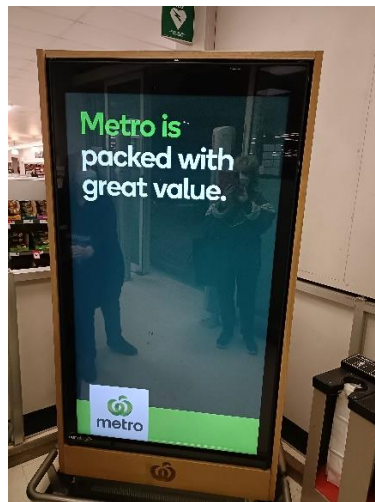
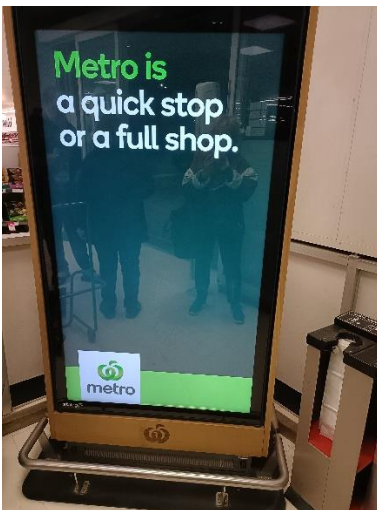
FoHV's ongoing engagement with residents and visitors to the Hawker Village Centre has highlighted the significant proportion of older people and those with mobility limitations who have expressed major concerns about how they would be disadvantaged by the proposed redevelopment, particularly with respect to parking arrangements. Many have also expressed a preference for a Metro, rather than a full-line supermarket, at Hawker.

We have heard from visitors to the Hawker shopping precinct that they visit this centre in order to access health and medical services or that they visit this centre specifically because the convenient and accessible parking allows easy access to shops and services.

In considering the Woolworths Direct Sale Application and related documents, FoHV has identified numerous areas of concern, (as detailed in our response to the FOI documents, attached).

These concerns include:

- The process involves no community transparency or opportunity for scrutiny of or comment on the Direct Sale Application.
- The proposal involves decisions by a private developer to remove attributes of a long-established shopping area that are valued by significant portions of the community.
- A compelling case for a full-line supermarket has not been made. The current Woolworths Metro at 1,574 sq.m. is larger than many other Metro stores. Woolworths' attempt to justify the need for a full-line supermarket at Hawker based on population appears to be based on flawed calculations, oversights and an apparent lack of understanding of the local retail market. Taking into account the proximity and easy access of the primary and secondary catchment areas to the Belconnen town centre, Jamison and Kippax, there are currently five full-line supermarkets which serve this population, with more planned (including those at Kippax and at the Molonglo Town Centre), in addition to three ALDI supermarkets, as well as the Capital Food Markets. The catchment populations are, therefore, not nearly as poorly served as Woolworths suggests.
- Woolworths has strongly supported the virtues of their Metro supermarket at Hawker, as illustrated in these recent electronic display screens at the entrance to the Hawker supermarket



The above three signs were photographed in Woolworths, Hawker, in 2024

In the absence of changes to increase transparency and community consultation, FoHV believes that significant blocks of public land should be excluded from eligibility for the Direct Sale process.

Inadequate community consultation

FoHV's ongoing engagement with residents and visitors to the Hawker Village centre has highlighted the significant proportion of older people and those with mobility limitations who visit

this centre and who have expressed major concerns about how they will be disadvantaged by the proposed redevelopment. Many of these individuals have explained that they visit this centre in order to access health and medical services or that they visit this centre specifically because the convenient and accessible parking allows easy access to shops and services. A number of individuals with mobility limitations have also noted that the parking at this centre -- which is at street level and only a short distance from the shops -- was a major factor in their decision to move to one of the nearby suburbs.

The Communication Link survey report and a survey conducted by the Belconnen Community Council indicate that there is support for improvements to the Hawker shopping precinct but there is a lack of strong support for extensive redevelopment which would reduce accessible parking and erode the precinct's local feel.

In the present situation, community engagement is entirely developer-driven, with the prospective buyer having complete control over consultation design, implementation and interpretation. This has resulted in weaknesses in the consultation process, with potential implications for Government decision-making. If it is not possible to implement an independent consultation process, free from the biases and interests of the potential buyer and seller, the approach to community consultation for Direct Sale applications for significant areas of public land should, at the very least, conform to the principles described in the Planning (Good Consultation) Guidelines 2023 (No 1).

Specific features of the proposed redevelopment

Greater clarity about specific features of the proposed redevelopment should be provided before and not after a decision is made to progress the application to the Development Application stage. Issues about which additional information should be provided include:

- Basement and other parking: basement parking entry and exit points; noise and traffic impacts; pedestrian impacts; whether pay parking will be introduced; at what hours basement parking will be accessible; pedestrian access between parking and shopping areas; availability of disabled and short-term parking; loss of customers who will avoid basement parking; potential for future Park 'n Ride spaces;
- Loading dock: entry and exit points and impact of noise levels on nearby residents and businesses;
- Building heights;
- Traffic congestion;
- Children's play area; and
- Specific design features of the redeveloped areas and their integration into other areas of the precinct.

Parking has, of course, been a central issue in proposed developments at the Hawker Village shopping area and requires particular consideration. The potential loss of street-level parking was a key issue in the lack of support for the ACT Government's draft Master Plan in 2011-2012. The Springvale Drive car park, with its many trees and shrubs, is an important and functional open space which provides a visual and sound buffer between the shops and the nearby residential area. It allows quick and easy access in close proximity to shops and other

services, including being one of the few places in this part of Belconnen where tradespersons can park trucks and trailers.

The accessible design of this shopping area has also been highlighted by visitors. Many of those who have spoken to FoHV have emphasised that the Post Office, pharmacy, bakeries and various health and medical services are among the reasons that older people and those with health issues visit this shopping precinct. The attributes of the area that are important to them include the street-level design which enables them to easily access the various shops and services without having to navigate stairs or other obstacles.

Seventeen areas of concern have been identified in the FOI documents. Among these concerns are those relating to:

- a generic approach without a local focus;
- failure to acknowledge or consider the particular history, character and location of the Hawker Village shopping area and its clientele;
- the lack of consultation leading up to the current Application (see section III below??) and inaction in response to EPSDD's requests to Woolworths to engage meaningfully with the community;
- questionable claims regarding community support;
- failure to highlight issues relating to basement parking at this location;
- reliance on flawed calculations, oversights and a lack of understanding of the local market to support the need for and benefits of a full-line supermarket;
- failure to consider local demographics and age-friendly development;
- failure to acknowledge the location of and to consider the impact of the redevelopment on health and medical services in this precinct, as well as other businesses and adjacent apartments; and
- insufficient regard to the impact of noise associated with the proposed redevelopment.

Inconsistent with Canberra as an Age-Friendly City

The ACT Government's vision is "for Canberra to be an inclusive, welcoming city, where growing older is celebrated and supported" (https://hdp-au-prod-app-act-yoursay-files.s3.ap-southeast-2.amazonaws.com/3417/1316/0988/Final_AFCP_Summary_Discussion_Paper_150424.pdf). With the older population of the primary and secondary catchment areas for the Hawker Village precinct exceeding the ACT average, efforts to be an "age-friendly city" must include incorporating the needs of older citizens, as well as other age groups, into shopping centre design.

The quick and convenient street-level parking, together with the size of the Woolworths Metro and easy access to the Post Office and other services, currently makes Hawker Village an attractive destination for older people and for those with mobility limitations. We support the views expressed by Advocacy for Inclusion that there should be "... joint pursuit of age- and disability-friendliness in city planning. Population projections show rapid growth in the cohort of older Canberrans, and the prevalence of disability rises with age. These changing demographics have serious implications for how people live and work in, move through, use

services, and interact with their surroundings.” (<https://www.advocacyforinclusion.org/age-friendly-city-plan-2025-35/>)

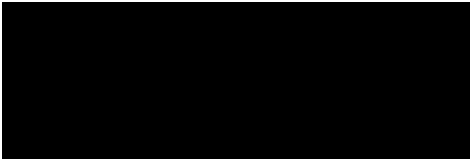
It has been increasingly recognised that the planning process needs to reflect liveability factors across the lifespan. The Woolworths Direct Sale Application, however, ignores the implications of local demographic data in relation to needs and preferences, including physical access. Shopping centre redevelopment should include a focus on ensuring that the needs of vulnerable members of the community are accommodated. This is especially relevant to a location such as Hawker Village, with its older population and health and medical services. We do not believe that replacing the large and accessible Springvale Drive car park with basement parking would be consistent with the ACT’s commitment to age-friendly urban planning.

Conclusion

Much of the character, efficiency, convenience, functionality and popularity of the Hawker Village centre derives from its size, design and accessibility. Hawker Village is and was designed to be an intermediate-sized centre in a residential area. FoHV believes that there are compelling reasons that the proposed Direct Sale of the Springvale Drive car park should not be approved and that the current Direct Sale process does not provide a sound basis upon which to assess or to approve Woolworths’ application for this and other Government-owned land at the Hawker Village shopping precinct.

FoHV is not opposed to changes and improvements at this shopping area which are of appropriate scale and design for this location and which are consistent with community needs, preferences and expectations. There has been no consideration, for example, of options other than a full-line supermarket and no consideration given to improvements to the current supermarket which do not require building on the current parking area. Promotional language and promises about a ‘fresh’, ‘modern’, ‘revitalised’ and ‘vibrant’ development should not be a substitute for detailed information and critical assessments of exactly what is proposed and what the implications would be for the community.

We are hopeful that the present Inquiry will increase the understanding of both procedural and substantive issues in relation to the Direct Sale of significant areas of Government-owned land at Hawker and will result in thorough, informed and conscientious consideration being given to future development for this popular and long-established shopping precinct.



Colin Lyons,
Convenor
Friends of Hawker Village Incorporated

30 April 2025

ATTACHMENT to submission for Direct
Sale of public land in Hawker Village



18 December 2024

Friends of Hawker Village – Response to documents released under Freedom of Information Request re Woolworths Direct Sale Application

Friends of Hawker Village (FoHV) has received documents under Freedom of Information relating to the 2024 Woolworths Direct Sale Application for Government-owned land at the Hawker Village shopping precinct. FoHV is taking this opportunity to raise concerns about matters associated with the information contained in these documents.

We are concerned that the Woolworths documents appear to contain unsubstantiated claims, oversights, lack of logical arguments and inaccurate or misleading information. It is important that these are drawn to the attention of EPSDD and others involved in assessing this Application, as they suggest that there are aspects of the Woolworths Direct Sale Application which deserve careful scrutiny and should not be taken at face value.

1. Misrepresentation of FoHV position on the proposed re-development of Hawker Village Shopping Precinct (HVS)

The statement in the FOI documents (Pack 2, Page 15), that FoHV “would prefer to have no change” and is “resistant to change” is a misrepresentation of FoHV’s position. FoHV recognises the potential benefits of appropriate improvements to the Hawker Village shopping precinct (HVS), which has been allowed to deteriorate as a result of neglect by private property owners and by the ACT Government.

Based on the feedback that we have received from the community, however, we do question the scale and some features of Woolworths’ proposed re-development. We do oppose the sale of the public Springvale Drive car park and its replacement with basement parking. We would support changes which involved redevelopment within the current (or even slightly enlarged) footprint of the centre. We note that the environmental aspects of street-level parking can be improved and are the subject of a tree-planting project at nearby Jamison Plaza, Macquarie.

2. Site and character of HVS

The Direct Sale Application pays insufficient regard to the history, character and location of the HVS. Indeed, it is striking that the maps of the area provided by Woolworths do not identify or acknowledge the nature and clientele of most of the surrounding businesses and services (see section 13, below). HVS was for decades referred to as an ‘intermediate centre’, i.e. larger than

a local shopping centre but smaller than a group centre. We understand that this occurred when an area of land along the southern boundary was sold for residential use (townhouses along Undoolya and Limbunya Streets). As an intermediate centre, the HVS was never intended to include a large supermarket. In recent years, the ACT Government discontinued the term ‘intermediate centre’ and the HVS has been referred to as a Group Centre, although it has very much retained the character of an intermediate centre.

Unlike other ACT Group Centres, HVS is surrounded by long-established residential zones on three sides (Springvale Drive, Beetaloo Street as well as the aforementioned townhouses). To the north of HVS are the Belconnen Way Hotel and Serviced Apartments, established over 50 years ago and still under the same ownership. Adjacent to the hotel, in unit-titled areas of the building, is the Liquor Legends business and a Bhutanese restaurant/function centre which hosts large events. To the west of the retail area are a church, vicarage, medical centre, allied health businesses, professional offices and the Pinnacle apartments (these apartments directly front the Hawker Place extension which forms part of the Direct Sale Application). As the primary catchment suburbs of Weetangera, Page and Scullin no longer have local supermarkets, HVS has become the local shopping area for many people living in those suburbs.

3. Woolworths Consultation (Lack of)

It should be noted that Woolworths’ efforts at informing and consulting the community about its redevelopment proposals, including during the July-August 2023 “community engagement” period, have been minimal. The focus of the 2023 community engagement on the community’s “vision for the Hawker shopping precinct’s future” was deliberately vague.

Many of the HVS traders commented to us that they had not been contacted by Woolworths and Woolworths did not undertake any of the normal measures that one would expect would be undertaken to inform HVS customers and clients about the proposed redevelopment, such as displaying notices on shop windows and distributing information leaflets to customers. Consequently, FoHV has made ongoing efforts to inform the community about the proposals.

Many community members who attended one of the two drop-in sessions organised by Woolworths at the HVS said that they had not been given any advance notice of these sessions and only happened upon them by chance; they had also not been aware of the proposed redevelopment. Others commented that the single evening workshop (with only 45 participants) was held at an inconvenient time.

During the 2023 community engagement period, the community was given no specific information about Woolworths’ “vision”, either general or specific, for the HVS. No examples of designs to which the community could respond were available. This means that any expression of community views about the desired appearance, ambiance and functionality of the HVS would not have been able to take account of any clear notions of what Woolworths might have envisaged.

There are at least 12 instances in the FOI documents where EPSDD has encouraged Woolworths to engage with the community and in particular with FoHV. Despite this advice, Woolworths has not sought discussions with FoHV for any purpose, including (as EPSDD specifically recommended) to obtain a better understanding of the community's concerns about the former draft Master Plan for the area.

Woolworths has undertaken no community engagement activities since August 2023 (prior to release of detailed plans of the proposal). One notice about the proposed redevelopment which was belatedly placed in the window of the Woolworths Metro supermarket, was, as we understand, not a Woolworths' initiative but was placed at the request of a local MLA. To the extent that Woolworths has relied on members of the community accessing their website, the website has contained inaccuracies about the Direct Sale process.

In early April 2024, Communication Link, acting for Woolworths, sent an email to those who had participated in the 2023 community engagement to advise them that Woolworths had submitted a Direct Sale application. This email included links to the Master Plan developed by Woolworths. Although email recipients were invited to contact Communication Link with any questions or comments, FoHV received what was apparently the standard response to questions or comments: "It is too early to address specific details like those outlined in your letter" and that more information would be provided if the Application proceeds to the development application stage.

Woolworths states (Pack 3, Page 79) in an email to Ms Hicks "please be assured that we are responding promptly to any queries or requests for information that we receive from members of the community and other stakeholders. There have been very few since we submitted the (Direct Sale) application" in April this year. That is not surprising, as few visitors to HVS would be aware of the implications of their Direct Sale Application or know that it had actually been lodged earlier this year, as no public notification was required.

As noted, FoHV was told that a response to our concerns will have to wait until a Development Application is lodged. This is contrary to the consultation experience in 2010-12 when Government-initiated consultation on plans to re-develop HVS occurred. We are not aware of a Woolworths presence at HVS during 2024 and there has been no 3D model, much less opportunities for face-to-face questions and community feedback.

It is unrealistic and unreasonable for Woolworths to expect the community to contact them with concerns about the proposed re-development. In our experience, those who have a view about proposals such as this will contact the ACT Planning Minister and/or their local MLAs. This is exactly what appears to have occurred in this case, with numerous members of the community writing to the Minister and their MLAs rather than to Woolworths. Indeed, a Ginninderra MLA responded to one local resident's letter by acknowledging that she had "heard from lots of residents" about the proposed sale. This is in contrast to Woolworths' statement to EPSDD (4 July 2024) that they have received "very few" queries or requests for information from members of the community or other stakeholders.

There is obviously much that Woolworths is unaware of (or has chosen to ignore) and has, therefore, not communicated as part of their Direct Sale Application in relation to the “public benefit” of a Direct Sale. Whilst it is true that there is community support for improvements to the HVS, it is the nature of those improvements and who should be responsible for them that are at issue.

4. Claims regarding community support, etc.

The claimed support for “revitalisation” of the HVS cannot be taken as support for any specific elements of Woolworths’ proposals, as no specific information was provided to the community at the time of the 2023 community engagement. The claim, in June 2023, that Woolworths would be seeking “a thorough understanding of the issues relevant to our proposal” from local stakeholders (Pack 2, Page 31) is not supported by their actions. The July-August 2023 community engagement period included no details of Woolworths’ proposal, making it difficult to obtain a “thorough understanding”.

As previously noted, the fact that Woolworths was seeking advice from EPSDD about how they are meant to be “engaging meaningfully with the community” (Pack 3, Page 93) is a striking indictment of their understanding of and commitment to community engagement. It is certainly the case that members of the community have written to the Planning Minister and other MLAs about the proposals, which is exactly what most people would do to ask questions and express concerns about planning and development issues.

5. No information about what the community wants

No information is provided about what the community actually wants in terms of Woolworths’ visions for a “safer and improved public realm” or a “vibrant, interesting and lively retail experience and activated streetscape”.

According to what many Hawker Village shoppers and community members have told us, local customers value a quiet and efficient experience, without noise and crowded areas, and the ability to meet friends for coffee and go about their business efficiently.

Many customers have also expressed their disappointment and concern that the ACT Government is willing to abandon its responsibility for improving and maintaining the public spaces for the benefit of the community and is willing to transfer this responsibility to a private developer whose focus is on commercial interests.

6. Community concerns

Concerns raised by members of the community, in their representations to the ACT Planning Minister and other MLAs, are relevant to the consideration of Woolworths’ Direct Sale Application. Based on copies of these letters provided to FoHV by those who wrote them, an overarching concern is that the sale of the public land to Woolworths will result in the destruction of the very features that attract people to this shopping area and will turn it – a

modest, easy-access, low-rise precinct in the middle of a residential area – into an oversized and inappropriate development with the inconvenience of basement parking. These concerns are consistent with the feedback that FoHV has continued to receive over the past 20 months from those who have become aware of Woolworths’ proposals.

Since lodgement of the Woolworths Direct Sale Application, FoHV has engaged with hundreds of shoppers entering or leaving the Woolworths Metro supermarket. Our engagement has been face-to-face, asking people if they are aware of the Woolworths proposals and the various elements of those proposals. A significant proportion of people remain unaware of the proposals. We have also recently surveyed community members who attended the Weetangera Primary School fete on November 2024, with these survey results to be the subject of a separate communication.

Typical responses from our face-to-face engagement with Woolworths shoppers at HVS include:

- Many shoppers have said that they were unaware of Woolworths’ proposals.
- Many shoppers, including those from outside the primary catchment area, have said that the convenience and accessibility of parking at the HVS were key factors in their decision to shop at Hawker. The open street level parking along Hawker Place and the large Springvale Drive car park were singled out as particularly convenient. These shoppers have said that they would go elsewhere if this quick and convenient parking is removed.
- Many older people and parents with babies and young children have said that basement parking does not meet their needs and that they avoid visiting shopping areas where basement parking is required.
- An overwhelming majority of older people and those with health or mobility issues have cited the importance of the current street-level design which allows unimpeded access to a range of shops and services.
- Many of those who were aware of the proposals have expressed concern at the apparent lack of consultation with representatives of older people and of those with physical disabilities.
- Tradesmen with large vehicles and/or trailers have said how important it is to have access to open, street-level parking and that basement parking at HVS would be completely unsuitable for their vehicles.

7. Basement Parking

The Woolworths Direct Sale Application does not highlight the company’s intentions to replace street-level surface parking with basement parking, which is a major focus of concern among community members. It is crucial for the Government to understand what it would mean for the community if the Government-owned Springvale Drive car park is sold to Woolworths and replaced with basement parking. The prospect of undercroft parking was also a major source of community opposition to the previous draft Master Plan for the Hawker shopping precinct.

It is clear that convenient, open parking areas at local shopping areas are regarded as essential not only by HVS shoppers. Canberra Times journalist Megan Doherty has written that she visits her local shopping centre every day (“I’m no good at online grocery shopping. I am just not that

organised.”) and especially values “their big carpark where you can always get a park for free ” (‘With 2023 almost gone, these are the little things I’m grateful for this year’, 10 Dec 2023, at: <https://www.canberratimes.com.au/story/8452775/>).

In relation to HVS, Woolworths told FoHV in 2023 that their motivation for a full-line supermarket, with associated basement parking, is to capture a higher retail spend. There was no acknowledgement of the importance that many in this local community place on accessible, street-level parking in close proximity to shops and services or even the reality that a significant portion of shoppers value the HVS as ideal for a “quick shop”.

A full-line supermarket at Hawker is likely to inconvenience the many customers who want to do less than a big weekly shop, while not offering enough to compete with the retail offerings at locations such as Westfield Belconnen.

The commercial importance of a “quick shop” should not be under-estimated; there is evidence that food retailers generate more income per square metre from shoppers doing a “quick shop” than they do from those intending to do a larger, weekly shop because the former are more likely to make impulse buys. According to Dr. Paul Harrison (Unit Chair of Consumer Behaviour in the Department of Marketing at Deakin Business School, Deakin University):

“Research shows if you can get a customer in for five or ten minutes, they spend more per minute than a customer who is in for 30 minutes or so. The high-value customer is the short-visit customer” (CHOICE, Supermarket psychology: Tactics to get you to spend more, 10 Jan. 2023, at: <https://www.choice.com.au/shopping/everyday-shopping/supermarkets/articles/supermarket-sales-tricks>).

An inconsistency in Woolworths’ claims is that, while they acknowledge that time pressures are a major consideration for many shoppers, they fail to acknowledge that the ability to get in and out of a supermarket quickly, combined with quick and convenient parking, are what shoppers value in relation to mitigating these time pressures.

The proposal for basement parking is linked to Woolworths’ claim that a full-line supermarket is needed in this location (see comments below regarding this claim). Woolworths is trying to ‘have it both ways’: they maintain that there is a “need” for a full-line supermarket in this location whilst also acknowledging that people would continue to patronise other shopping centres because of the larger retail offerings there (including additional supermarkets and other retail outlets).

There is no acknowledgement by Woolworths that, for many people, particularly but not exclusively older people, basement parking is an unwelcome aspect of shopping centre design; nor is any evidence provided to support Woolworths’ claim that there will be better access for people with a disability (Pack 1, Page 31). The proposed basement parking will require the use of a travelator or lift in order to access shops and services, as opposed to the short and direct street-level pedestrian crossing which is currently available.

Consistent feedback to FoHV indicates that ground level, easy access parking at HVS is crucially important for older people, for shoppers with prams, for those requiring mobility aids and for those with disabilities. There is no doubt that open street-level parking with safe pedestrian crossings is convenient and accessible, whereas basement parking is more difficult and time-consuming.

8. Unsupported “need” for and “benefits” of a full-line supermarket at Hawker

(a) *No need based on population*

Woolworths’ claim that a full-line supermarket is needed at Hawker is based on flawed calculations, oversights and an apparent lack of understanding of the local retail market. Woolworths bases their calculations on a population of 28,000 in the primary and secondary catchment areas and on the expected provision of a full-line supermarket for every 8,000 – 10,000 people. On the generous side, that would mean 3.5-4 full-line supermarkets for this population.

In fact, there are currently five full-line supermarkets which serve this population. Without a full-line supermarket at Hawker and with the current retail expansion at Kippax, there will be full-line supermarkets at Westfield Belconnen (2), Kippax (2), and Jamison (1), in addition to three ALDI stores, all within a few kilometres of and easily accessible to this population. Woolworths fails to acknowledge that, while these full-line supermarkets may not be located strictly within the boundaries of the HVS catchment suburbs (as defined by Woolworths), they are only a few kilometres away and are easily accessible by private or public transport.

In their simplistic calculations, Woolworths also does not appear to have taken account of distinct ACT characteristics, such as detailed planning in relation to the location of supermarkets, better road networks and suburb-to-suburb public transport. (The supermarkets at Westfield Belconnen, Hawker and Kippax are accessible via the same ACTION bus route which also travels through Weetangera.) It should, therefore, be recognised that, in relation to full-line supermarkets, the catchment populations and nearby areas are not nearly as poorly served as Woolworths suggests – in fact, they are well-served.

It should also be noted that a 1,500 sq.m. supermarket is scheduled to open in Ginninderry (border of Strathnairn and Macnamara) in late 2027 and planning for a Molonglo Town Centre with full-line supermarket(s) (nine minutes’ drive from HVS) is underway. There are also a number of smaller supermarkets in this area. In addition to the current Woolworths Metro at Hawker and a recently-opened Woolworths Metro at Wright, nearby smaller supermarkets include those at Florey, Cook, Latham and Holt, as well as the recently revamped Capital Food Markets (2.3kms from HVS). There is also a large Woolworths supermarket with open, street-level parking at Charnwood (an eight-minute drive from HVS and closer to some of the suburbs in the secondary catchment area).

Pack 1, Page 50, refers to a population growth of only 1,100 people in the next 18 years (2023-2041) in the main trade area. *Based on all of this information, there is a lack of compelling*

evidence for an undersupply of supermarkets for the primary and secondary catchments, both now and for the foreseeable future. Certainly, the feedback that FoHV has received from shoppers is that they value the Woolworths Metro at HVS and agree that it could be improved, however, their reasons for doing their “weekly shop” elsewhere (for example, at Westfield Belconnen, which is only 2.4 kms from HVS) have less to do with the size of the Woolworths Metro and more to do with the opportunity to visit other retailers (KMart, Target, ALDI etc.) and services (banks, health insurance etc.) at the same time.

(b) Questionable argument in support of “benefits” of full-line supermarket

The argument that a full-line supermarket at Hawker would provide access to a greater range of products without having to travel further afield does not stand up to scrutiny, as this argument could be made in support of a full-line supermarket in every suburb. Woolworths claims that the increased patronage generated by a larger supermarket would benefit other HVS businesses, however, no evidence is provided for this claim. This claim also ignores the contrary economic argument that there can be negative impacts on smaller food businesses which are unable to compete with a major supermarket chain.

Woolworths mentions their desire to provide additional supermarket services at Hawker in the form of home delivery and direct-to-boot. Home delivery is currently available to residents of the catchment area and Woolworths at Westfield Belconnen, which is 2.4 kms from HVS, provides direct-to-boot service.

9. Time pressures considered – or not?

While Woolworths notes (Pack 1, ‘Needs Analysis’) that “time pressure” is the major issue that people face when doing regular food shopping, they choose to ignore this in relation to major aspects of their proposals which would result from the proposed Direct Sale. For example, it is difficult to understand how the proposed basement parking arrangements would be superior to the current quick and accessible street-level parking in terms of time efficiency. The claim that there would be a “convenient basement car park” (Pack 3, Page 46) ignores the inconveniences of basement parking and the relative convenience of the current open, street-level parking.

Shopper feedback to FoHV has indicated that there are two time-relevant reasons that people choose to shop at the Woolworths Metro at Hawker: access to quick and easy parking and the size of the store which permits shopping to be completed quickly without having to walk the length and breadth of a full-line supermarket. A Direct Sale to Woolworths would result in a full-line supermarket with basement parking and would, therefore, be inconsistent with those time concerns.

10. Local demographics and “Age Friendly” Development

The population data in the Woolworths documents indicate that 36% of the primary catchment is aged 50+ years and 25.2% of the primary catchment is aged 60+ years. Excluding those aged <14 years who obviously would not require parking, the proportion of people over 50 years is 43% and those 60+ years is 30% of the population.

Canberra's efforts to be an "age-friendly city" must include incorporating the needs of various age groups into urban design. Woolworths acknowledges, in their Economic Impact Assessment (Pack 1, E.I.A. Page 16, Table 22), that more than 25% of the population of the Hawker catchment area are age 60+ and that more than 21% of each of the secondary catchment sectors area also aged 60+ -- well in excess of the ACT average of 18.3% for this age group. Woolworths has chosen to ignore the implications of the local demographic data in relation to shopping centre accessibility needs and preferences.

11. Reinforcing market dominance

An overview of existing ownership of supermarkets in the 17 ACT Group Centres is provided at Pack 1, Page 62. It is difficult to see how a full-line Woolworths supermarket at Hawker will do anything other than reinforce market domination by Woolworths. Currently, Woolworths has ten supermarkets in group centres, Coles six and Supabarn has one. It is difficult to make sense of Woolworths' assertion (Economic Impact Assessment, Page 39) that the proposed redevelopment would somehow constitute, "increased competition between supermarkets . . . and will not adversely affect the balance of the centre hierarchy."

12. HVS location

It is not clear what is meant by Woolworths' reference to the Hawker site being "accessible to passing traffic" with Belconnen Way being "a major connector Road in the region." There is no direct access to the HVS from Belconnen Way. The only access is via residential streets: Springvale Drive, Beetaloo Street and Coniston Street. There is a controlled intersection at Belconnen Way and Springvale Drive with traffic lights installed in 2021 due to the increase in traffic in that area.

13. Significant businesses, services and residences not acknowledged

Several of the maps of the current HVS provided with the Woolworths Direct Sale Application fail to highlight the location of significant health and medical services as well as other businesses and adjacent apartments.

Referring to Pack 3, Page 41, 'The Existing Site', it should be noted that Birubi Chambers (to the west of the HVS) accommodates not only the pathology collection service but also the Hawker Medical Centre (26 employees) and other professional offices. The Allied Health Services building which accommodates a large physiotherapy practice and psychology services is not labelled nor are the Pinnacle apartments which face onto the proposed Hawker Place extension. There is also no mention of the lower-level businesses on Hawker Place, opposite the Pinnacle apartments.

To the north of the Springvale Drive car park, the Belconnen Way Hotel and Serviced Apartments are marked. However, the building is strata-titled and also accommodates the Liquor Legends business and the Meet Point Bhutanese restaurant/function centre, neither of which are shown.

All of these businesses, services and residences would be significantly impacted by the Direct Sale of the Government-owned land and the scale of Woolworths' proposed development, which the Direct Sale is intended to facilitate. The clients and customers of these businesses also have relied, for many years, on the accessibility of the Government-owned Springvale Drive car park.

It would obviously be important for the Parking Survey mentioned in the FOI documents to include consultation with these businesses regarding the impact of basement parking and of proposed entry and exit points, replacing open, street-level parking.

In relation to the parking survey and related reports: The documents show that Woolworths asked EPSDD (on 13 August 2024) (Pack 3, Page 92) when information can be made public, including the report by JPS Engineering, which was to be completed in June 2024. There is no further information about this report and its status.

This is an important issue in relation to transparency: information regarding relevant reports including site investigations and related studies which are undertaken and paid for with public funds as part of the Direct Sale assessment process, should be made publicly available in a timely manner. Indeed, the questions posed by Woolworths on 7/8/24 (Pack 3, Page 96) about "initial site investigations" are equally relevant to the community.

14. Tell-tale sign of non-local focus

The Economic Impact Assessment (which is full of 'developer-speak') is an obvious cut-and-paste from another Woolworths development in Queensland. See Pack 1, Page 24 which refers to Greenbank Shopping Centre. This Centre is approximately 29km south of Brisbane in an area expected to house a population of around 138,000 people – in other words, nothing like the HVS and its surrounding area. The apparent re-use of information undermines the credibility of Woolworths' arguments and purported focus on HVS and suggests a lack of genuine understanding of and sensitivity to the shopping patterns and preferences of the local community.

15. Use of mobile phone data to determine shopping centre patronage

There are limitations associated with the use of mobile phone "ping data" to determine patronage of the HVS. For example, this data would not include individuals without mobile phones, those whose phones are switched off and those who choose not to take their phones with them. This information also does not indicate whether people have accessed the HVS on foot or by private or public transport. It also provides no information about the reasons that people visit the HVS. Some may visit for supermarket shopping but many may primarily visit HVS to visit other businesses and services. Our discussions with those who actually visit the HVS indicate that, regardless of the main purpose of their visit, the vast majority of visitors place a high value on the free, open, 24- hour parking that the Springvale Drive car park provides.

16. Noise impact on residential amenity

To those familiar with the residential area which surrounds the HVS, it is clear that Woolworths' redevelopment plans give insufficient regard to the likely negative impacts of increased traffic and noise, including around vehicle entry and exit points and at the Springvale Drive-Belconnen Way intersection. The Direct Sale of the Hawker Place extension for access to basement parking would have a major impact on the residents, shops and services in that area, including the church, the medical centre, a number of allied health services and the residential units directly facing and with access from that road. Based on current plans, it is difficult to see how additional noise from a loading dock servicing a full-line supermarket would not adversely impact local residents, as well as guests at the Belconnen Way Hotel.

Traffic noise, including from delivery vehicles, cannot be dismissed as a mere nuisance. A recent review has highlighted findings which indicate that, in addition to the well-established adverse health effects of vehicle-related air pollution, exposure to traffic noise can result in measurable risks to metabolic and cardiovascular health. Night-time noise poses particular risks to health due to the disruption of circadian rhythms and sleep quality and can have severe cardiovascular effects, including elevated blood pressure, increased arterial stiffness and heightened oxidative stress (Münzel, T., Daiber, A., Engelmann, et al., 2024. *Noise causes cardiovascular disease: It's time to act*. Journal of Exposure Science & Environmental Epidemiology, 1-10. DOI: 10.1038/s41370-024-00732-4, <https://www.nature.com/articles/s41370-024-00732-4>).

17. Construction management issues

An aspect of construction management that does not appear to have been included in the Woolworths documents is the financial impact on HVS trades and services and the impacts on community during the construction stage if the Direct Sale is approved. Whilst no details have been provided about how construction would be managed to minimise the impact on traders and the community, the FOI documents (Pack 1, Page 87) indicate a single stage development schedule from July 2027 to September 2028. This suggests an impact on a range of retail and other services at HVS during the construction phase, particularly given the major excavations that would be required for the proposed basement parking; however, there is no apparent information about the likely financial impact on traders and the community during this period.

The loss of the Springvale Drive car park during the construction phase would place extreme pressure - from staff, shoppers, health and medical patients, hotel guests, restaurant patrons and construction workers - on the remaining street-level car park behind the service station and on the very limited parking for staff, clients and patients at Birubi Chambers. Visitors to the church regularly utilise these parking spaces, as the church has no dedicated on-site parking.

Because of the likely impact on numerous businesses and services, we believe that it is essential for construction management to be discussed with HVS staff, clients and customers prior to any decision to invite Woolworths to submit a Development Application.

18 December 2024