

4 April 2015

To:
Land Development Agency, brickworks@act.gov.au

Copy to:



**Submission on the Canberra Brickworks + Environs Planning and Development Strategy February 2015
(Deadline 4 April 2015)**

Dear Sir/Madam,

I live at [REDACTED], Yarralumla, ACT 2600 and wish to make the following submission.

I fully support the Yarralumla Residents Association Submission to the Land Development Agency of 1 April 2015 on the Canberra Brickworks and Environs Planning and Development Strategy February 2015, including its call for:

- A comprehensive traffic survey, with peer-reviewed modeling, of the existing suburb of Yarralumla, and adjacent suburbs to assess future traffic flows and impacts;
- The development's scale to be reduced to one in keeping with the character of Yarralumla and site topography, with a mix of dwellings and heights (no more than 3-4 storeys);
- Retention of the current landforms, buffering of the development from the current suburb with connected natural parkland instead of a formal park along Denman Street, retention of continuous walking /cycling trails and of the golden sun moth and natural temperate grasslands within that corridor;
- A revised strategy for the Canberra Brickworks and Environs that is consistent with the National Capital Plan;
- Transparency from the ACT Government on costings for preservation and adaptation of the core Canberra Brickworks elements, and calls for establishment of a formal trust, with Government funding, empowered to raise funds from the private sector and public.

Furthermore I urge the retention of existing landscape and green buffers – in particularly not proceeding with any development that significantly changes the existing topography of the site, which forms part of the original Burley-Griffin plan for Canberra, or anything that results in removal of more than the bare minimum number of mature trees from the landscape. Any development should also retain the existing

“green buffer” between the developed areas and Adelaide Avenue, by not building on the existing urban park area between Kintore Circle and Adelaide Avenue.

I also strongly recommend that the results of the telephone consultation carried out by Winton Sustainable Research Strategies, published on 25 March 2015, be reviewed and interpreted carefully. I have been alarmed by some of the headlines, including articles published on the ACT Government websites that selectively interpret and quote from the survey to misrepresent support for the current deeply flawed plans. I hope that this sort of misrepresentation is an isolated event and that the LDA intends to carry out a true consultation and not selectively use inputs to support a pre-determined conclusion. It is notable that the survey shows that almost 75% of the population are no more than “moderately in favour” of the plans put forward, which is a pretty damning indictment of what should be a flagship project for inner Canberra; less than 17% of the sample said there were no negative aspects, whereas almost 30% complained about the overpopulation and almost 25% complaining about overdevelopment. In the same vein, over 55% said the housing aspects should be improved, citing issues with density, height of buildings, too large a total number of dwellings being constructed etc. The top 3 positive aspects mentioned by those surveyed were the provision of recreational spaces, adding to open space/parklands, and preserving the heritage value of the area. The first two suggest that many respondents did not fully understand the proposal as it will actually vastly reduce the amount of open spaces, and even for recreational spaces, the proposed scarring of the landscape from massive earthworks and levelling will mean many years of reduction in such amenity. Meanwhile, although the survey does show the importance to people of preserving the heritage value of the area, in order to achieve this the LDA should ensure they preserve the existing landscape as per the Burley-Griffin plan, and that new housing is consistent with and sympathetic to the buildings in the same and adjacent areas.

Yours sincerely,

A large black rectangular redaction box covering the signature area.


Submission to the Yarralumla brickworks and environs plan 2015

Thank you for the opportunity to comment on the brickworks plan.

As a resident of Deakin I have a number of concerns about the impact that an additional 3,000 people, which would effectively double the population of Yarralumla, would have on the amenity of the area. Specifically, the traffic congestion and noise.

Noise on Adelaide Avenue

Adding 3,000+ people to the Yarralumla brickworks site would certainly increase traffic on Adelaide Avenue. Adelaide Avenue is already heavily used with traffic noise during peak periods able to be heard hundreds of meters away. This is because of the volume of traffic, the speed (many cars travel in excess of the 80km/h limit), and the noise of the cars themselves.

Adding more vehicles onto Adelaide avenue will almost certainly not only make peak periods noisier, but also extend peak periods, significantly reducing amenity for local residents. In addition, many houses are only meters away from Adelaide Avenue on both the Deakin and Yarralumla sides, and these residents face hearing speeding traffic at all times of the night.

To address the issue of Adelaide Avenue noise I suggest limiting the speed on Adelaide Avenue outside peak periods (7am-10am, 4pm-7pm) to 60km/h. This would significantly reduce noise so that Deakin and Yarralumla residents living close to Adelaide Avenue can have greater peace in their homes.

Traffic congestion at Deakin Shops

Introducing 3,000+ people into the area will also significantly increase patronage of the Deakin Shops. While the Yarralumla shops are closer to the brickworks, residents of the Brickworks commuting to and from the Parliamentary Triangle and Civic will find it much more convenient to shop at the Deakin shops due to its proximity to Adelaide Avenue.

While the Novar Street and Cotter Road overpasses have been earmarked for upgrade, the Hopetoun Crt intersection has not. It is already a dangerous intersection for pedestrians crossing to and from Deakin and Yarralumla, particularly children travelling to schools in each of those suburbs. Despite the STOP signs, cars travel at speed from Adelaide Avenue onto Hopetoun Crt. In addition, particularly during peak times, it is almost impossible to turn from Gawler Street onto Hopetoun Crt due to the non-stop traffic coming from Adelaide Avenue. The increased traffic from the Brickworks will just make things worse.

To address this, I propose two solutions. Firstly, pedestrian crossings should be installed on each of the onramps and off-ramps to and from Adelaide Avenue. They should be raised to force drivers to slow down and make pedestrians more visible. This will increase safety for pedestrians.

In addition, a roundabout should be installed at the intersection of Gawler St and Hopetoun Crt. This has been previously proposed in the Deakin Implementation Plan and the Yarralumla Brickworks proposal makes it all the more important.

The Canberra Brickworks and Environs Planning and Development Strategy February 2015

Submission

We have lived in Yarralumla for over 20 years and value the amenities that Yarralumla provides, access to the lake, walking and cycling tracks through wooded areas and relatively low population density, which give Yarralumla a village atmosphere within the city, something to be cherished and nurtured. The proposed development is totally out of character of Yarralumla and Deakin, does nothing to restore the historic Brickworks, will result in further traffic congestion, and pressure on Yarralumla shops, local schools and other facilities. In many parts of the world they are rethinking their high density developments and going to great lengths to recreate, preserve and enhance natural features, not create high density concrete jungles. The majority of the issues raised in the 2010 and 2013 development strategy consultation remain.

We are concerned about many aspects of this proposal, however there are some that stand out and deserve special mention;

1. The devastation of the environment and landscape through the flattening out of the forested ridges through the removal of 245,00 cubic meters of soil causing a drop of up to seven meters in some areas and includes the heritage listed remnants of Westbourne Wood. The claim that the intent is “to retain as much of the natural topography of the area as possible within the construction and planning constraints” is an out an out lie.
2. The industrial grid layout, its orientation and some of the building heights do not fit with the topography and bears no resemblance to surrounding residential area or any aspect of Yarralumla and is totally unsuited to the location. Better planning is available now in 2015 than back in the 1950s.
3. The significant loss of green space, trees and parkland. It is critical that the Oaks, the landscape green buffer planned by Burley Griffin and established by Weston between the city, Woden, Curtin and including part of the original Westbourne Woods be retained. The loss of this would be a national issue.
4. The “Old Uriarra Track”, walking and cycling track highly valued by the community would be an appalling loss, covered by streets, concrete and glass.
5. The cutting short of Dunrossil Drive and the loss of the Elm trees which I understand are heritage listed.
6. Doubling the size of the population will increase the traffic flow and congestion throughout Yarralumla. Roads and intersections will not cope with increase traffic flow. Major road infrastructure upgrades will be needed at great expense. Increased traffic flows could also result in greater risk to drivers, cyclist and pedestrians.
7. Yarralumla shops currently have a gross shortage of car spaces, and increased population would impact not only on Yarralumla services but also on those in Deakin and Curtin.
8. There is no indication of the restoration of the historic brickworks, only that it will be “made safe”. The ACT Property Council state that “the redevelopment of the Brickworks will be a landmark project that will benefit the people of Canberra” and I agree, however if all around is destroyed and replaced by a housing estate it will not be the feature that draws visitors.
9. It would seem that the development is inconsistent with the national Capitol Plan 2014, the Canberra Spatial Plan 2004 and the ACT Planning Strategy 2012 and the sustainable development principles of the ACT Territory Plan and the Estate development Code 2013 to say nothing of the destruction of Heritage listed Westbourne Wood and Dunrossil Drive with its heritage listing.

10. The original idea was to build on the area immediately next to the brickworks to finance this restoration, a much smaller housing development which fitted into the local area. With this increased development it would seem that restoration cannot be funded!!

This proposal seems to have little to do with the Brickworks and everything to do with a land grab and infill at any price. The scale and density of the proposed development seem to be driven by the need for revenue from these land sales to fund the light rail perhaps! Given the reduction of land releases by the ACT government in other areas and the forward thinking suggestion of creating high density living in office buildings near the city and urban centres there would appear to be no unmet current or future housing demand requiring such a huge scale development.

The proposed development does not provide for the 'Restoration of the Canberra Brickworks to create a major new destination in Canberra' and this is unacceptable.

We are not against development or urban infill; however development of this heritage site must be sensitive, sympathetic and in keeping with the current charm and character of the Yarralumla and Deakin suburbs, focus on the preservation of the green space, trees and parkland, and the sustainable development of the Brickworks.

We agree with and support the submission and suggestions made by the Yarralumla Residents Association

Yours sincerely

[Redacted signature]

Date 31 March 2015.

[Redacted name]

Yarralumla ACT 2600

[Redacted address line 1]

[Redacted address line 2]

From: [REDACTED]
Sent: Friday, 3 April 2015 6:57 PM
To: Brickworks
Subject: Yarralumla Brickworks proposal, April 3, 2015

Dear madam / sir

Thank you to LDA for the opportunity to comment on this February 2015 proposal. As it is a strategy for both the Brickworks **and** Environs you might find that many existing residents have some interest, as **no single proposal could threaten as much damage as this.**

Over the 20+ years that I have lived nearby, this is the third or fourth iteration for the Brickworks redevelopment. IT IS BY FAR THE WORST, in terms of the scale, density and type of (multi-storey) residences – and in terms of detriment to recreational access. This proposal represents a social and environmental disgrace, as has been painstakingly spelt out in the YRA submission of April 1, 2015. **I fully support that YRA Submission to the Land Development Agency.**

Although I feel sure that there is scope for modest medium density residential development in this area, the LDA has not demonstrated, in this or previous proposals, the environmental, economic and social repercussions related to the site, adjacent suburbs, and the transport corridor from Cotter Road to the City and Parliamentary Triangle. The LDA and ACT Government need to devise a plan that takes into account all the likely impacts of its development proposal. The LDA and ACT Government also need to demonstrate genuine commitment to engage effectively with Yarralumla and other affected residents (voters).

I am fortunate that I have elected representatives who will listen to and act on behalf of the community – their electorate. This letter is copied to our political representatives, local and federal.

Like most people of Yarralumla, Deakin and Curtin – like most Canberrans – I consider infill to be one of the practical, realistic and environmentally sound ways of managing for the future needs of the city. I live in Yarralumla, but **the direct and indirect detriment from the current LDA proposition is unthinkable** were it to advance.

Why can't agencies such as LDA take on board taxpayers/ratepayers communications from previous discussions to remediate and develop the Brickworks? Some of these were:

- the first LDA proposal (2010) for 950 dwellings in this area was rejected by the community (and political representatives at the time) as being excessive. That proposal would have destroyed the treasured features of this suburb;
- the next (2014) proposal of 1400-1600 dwellings was nothing but a call from the development lobby, and a grab for land sales, maximum rates. The suburb has about 1300 residences at present, so to propose another 1400 was totally contrary to the widely canvassed and accepted community views;
- the current proposal (up to 1800 dwellings) merely slaps the community further – what would motivate LDA to become deliberately inconsiderate of the existing resident and ratepayer?

As shown by YRA's April 1st 2015 submission, the key issues are:

1. The new plan **destroys valued open spaces**, ridge buffer, walking trails and biodiversity. I am appalled that the Canberra Brickworks Planning and Development Strategy 2015 will lead to flattening of this 49 hectare site, and destroy some 2000 trees, imposing an urban design incompatible with the site topography. Yarralumla residents and the local community value highly the connectivity between the open green spaces/natural parklands, mature trees (including the oak plantation) and walking trails in the development site. **The Strategy respects none of these values, and will destroy and eliminate the ridge buffer between South Canberra and Woden Valley – referred to in the National Capital Plan.**
2. **Traffic impacts.** I can only reiterate the major community concerns about the impact of the town centre scale development on traffic, existing street networks and parking in Yarralumla and surrounding suburbs. The YRA has rightly called for a comprehensive traffic survey, with peer-reviewed modeling, of the existing suburb of Yarralumla, and adjacent suburbs to assess future traffic flows and impacts.
3. **Scale and density.** There is scope for modest scale medium density residential development on the proposed site that could provide additional housing options, for both Yarralumla residents and the broader public. However, neither the Canberra Brickworks Planning and Development Strategy 2015, nor the LDA's specialist consultants' reports, provides justification for the figure of 1800 new dwellings in the development. The proposed density, doubling Yarralumla's population, bears no relationship to Yarralumla's existing character, including existing land use patterns, local street network, community facilities, and the built form. This is an abrogation of The Territory Plan, the Spatial Plan 2004, the ACT Planning Strategy 2012 and the National Capital Plan 2014 precepts, amongst others, with which the Territory Government must comply.
4. **Contravenes National Capital Plan.** Implementation of the Canberra Brickworks Planning and Development Strategy 2015 will impact adversely on the Main Avenue and Approach Route to the Governor General's residence. It will remove the direct entrance to Dunrossil Drive and replace it with a main access road to the new housing estate along the proposed Brickworks Road.
5. **Conflates Brickworks conservation and adaptation with residential development.** The Canberra Brickworks Planning and Development Strategy 2015 continues to conflate Brickworks conservation and adaptation with a massive residential development and multi-million dollar arterial road realignment. This has been pointed out in my previous submissions but once again has been ignored – without explanation.

Can there be infill development and Brickworks remediation without becoming a land and cash grab process that's so detrimental to the existing community? I hope so.....do you.....do our elected representatives?

Regards,


YARRALUMLA ACT

[REDACTED]

From: [REDACTED]
Sent: Thursday, 2 April 2015 7:12 PM
To: Brickworks
Subject: Feedback on Brickworks Proposal

Dear Sir

In simple terms we are not opposed to the development of the Brickworks site. That said, this plan appears to focus on the smallest possible investment in the brickworks site, some few million dollars, coupled with the largest possible revenue from the sale of land which will be in the many tens of millions of dollars.

We have many concerns with three the current plan. Our three major concerns are:

First, the density of people and traffic. The significant increase to the population of Yarralumla is not sustainable. The size of the development should be reduced and the roads should be widened and more graciously planned. There is no reason to cram in the maximum amount of dwellings possible on the site. This appears to be revenue raising rather than effective planning.

Second, the Yarralumla Shopping Precinct. The shopping area is too crowded already. Parking is a significant problem, particularly in mornings, evenings and on the weekend. Whilst we acknowledge that the redevelopment provides some parking, it is further away and will in no way cater for the approximately 3000 additional residents, a reasonable percentage of whom must inevitably use the shops.

Third, the landscape. We object to the proposal to modify/flatten the natural landscape. This is a feature of our suburb. Surely a more limited development is possible, one which takes into account the natural rise and fall of the land, the age and heritage style of the suburb and the access to Government House.

Yours sincerely,

[REDACTED]
Yarralumla

2 April 2015

Sent from my iPad

To whom it may concern

Re: Submission – Proposed Canberra Brickworks and Environs Development 2015

As a resident of Yarralumla, I am strongly opposed the latest proposal by the LDA and ACT government.

I will continue to oppose this development until the following main concerns in this submission are properly addressed : -

1. **The increasing number of residential households**

According to the 2011 census, the population of Yarralumla is 2922 and with the proposed additional 1800 households, the projected population is expected to be more than doubled **without significant budgeted increase in infrastructure.**

2. **The proposed traffic management plan is not viable – residents will use the quickest route (i.e. via existing streets in the suburb).**

Abbott and Woolls street will carry the majority of the increased traffic to and from the proposed residential development. These two streets are the smaller of the streets in comparison to Kintore and Maxwell streets. This needs to be addressed. Abbott Street is 7m wide, Woolls street is 6.3 m wide whereas Maxwell Street (which connects to Western Street) is 9.2m wide.

3. The traffic load to existing streets can be alleviated by **NOT** connecting the higher density proposed development to the existing streets in the suburb. So far there are no studies done on the impact of the additional traffic on these streets. Over the last 3 years the traffic flow into Novar Street has increased considerably with the opening of new suburbs in Western Creek.

- a. The connection of existing roads to the proposed development will encourage “rat running” for traffic trying to avoid the congestion between Cotter road/YarraGlen and Adelaide Avenue during peak periods (see Figure 2). This includes traffic from the new Western Creek suburbs as well as additional traffic from the proposed development. This is in part acknowledged in The Traffic, Transport and Infrastructure Report, Part 2, which states that *“DudleyStreet still carries some rat - running traffic but the congestion is greatly relieved. With the added connectivity, traffic between Cotter Road and North Yarralumla is also seen to be using the Brickworks Road – Denman Street Woolls Street route as an alternative.”*

I believe that “rat running” will be significantly worse than predicted.

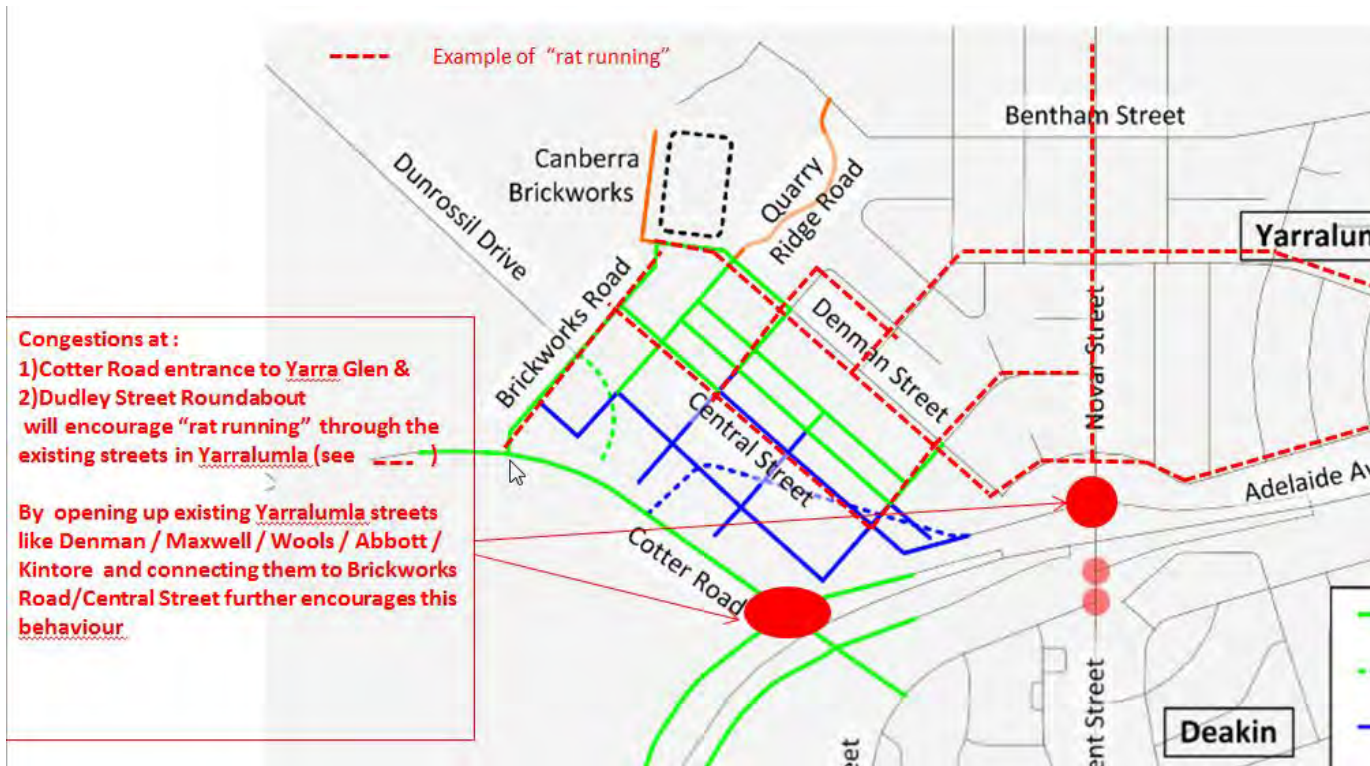


Figure 2 – Opening up existing streets to the proposed development will greatly encourage “rat running” as traffic avoid the congestion of Cotter Road and YarraGlen.

In addition to the above points, I have **serious concerns over the handling of these development proposals over the last 5 years:** -

- **The government does not appear to be listening to constituents.** In 2010, constituents opposed the proposal of 990-1000 dwellings. Regardless, we now have a proposal for 1800 dwellings. The number of proposed residential households has increased with each subsequent proposal (see attached table). This increased in residential housing has a direct increase on the traffic flow to existing roads and infrastructure. .

2010-Proposal- π	2014-Proposal- π	2015-Proposal- π
No-of-dwellings: 990-1100 π	No-of-dwellings: 1600-on-42-hectare-site- π	No-of-dwellings: 1300-on-42-hectare-site, plus-500-on-an-additional-7-hectare-site π Total 1800 π

Table 1 – History of proposed number of dwelling with each proposal

- **Proper planning Process**

This development was not part of a strategic plan for the ACT. It would seem reasonable to assume that the ACT Government is pursuing urban infill without proper planning, at any cost to fund projects such as the light rail development.

In conclusion, I would like to note that I am not opposed to properly planned urban infill but I remain strongly opposed to this development going ahead in its current form.

Yours faithfully

██████

██████████

Yarralumla

4th April 2015

brickworks@act.gov.au

Land Development Agency

This submission is to comment on the proposed 'infill' in Yarralumla and Deakin which would be better described as a new suburb.

I understand and accept urban infill is necessary for housing the population growth of Canberra. I expect this to be done in a manner that is aspirational in terms of design including being compatible with the adjacent or surrounding existing suburb and meeting the ACT's strategic planning documents.

I consider the *Canberra Brickworks + Environs Planning and Development Strategy (2015)* and associated documents to be an improvement on the less than satisfactory 2014 Strategy but it still completely fails practically all tests of what might constitute an acceptable development. The Strategy document is patently a land marketing glossy brochure with many possibilities that have no connection to rules or criteria.

I note that this is only the latest in a series of failed attempts to sell this land with an overriding aim to gain revenue.

The better elements include changes to traffic provisions and specific provision for a modest commercial space in Yarralumla. It is extremely disappointing that this is the best that can be said, especially when they were effectively forced by community pressure.

Because LDA's approach to this project is so fundamentally wrong, the only way forward is to start again. The residential area needs to be totally separated from the Brickworks conservation and remediation and approached to enable:

- LDA to focus solely on marketing the land to developers otherwise there is a clear conflict of interest;
- ACTPLA, or preferably an specific urban / suburban (re)development body to guide the town planning aspects; and
- a separate body to manage the Brickworks.

The Winton Survey

I am very critical of the totally misleading message that LDA is determined to draw from the Winton survey and only comment on it because of this. I accept that the survey has been carried out within appropriate standards but I totally disagree with the marketing message that I can see will be trumpeted to support the LDA's proposal. Specifically, I understand that only 139 of the survey respondents live in Yarralumla. Most of the remaining 1261 respondents understandably cannot be expected to have done more than cursorily read the very misleading glossy brochure to understand what is really being proposed for the residential development, and therein lies most of the criticism being made in regards to this proposal. The brochure's early pages are largely devoted to the Brickworks and the remainder is little less than an idea of what might be, but probably won't.

The perceived positive aspects on page 8 of the report support this concern:

“The five most positively perceived characteristics of the revised proposal are that it (with my comments in red):

- provides recreational facilities (no mention that it removes the much valued walking area for existing residents, and a lot of open space)
- opportunities and uses (34.7%) (it is not clear whether this refers to the Brickworks development or the residential area, but could only refer to the former and is misleading to be reported as if it were both)
- adds to open space and parklands (34.3%) (patently nonsense, as most of the open space will be built on)
- protects the history and heritage of the site (22.3%), (again this can only refer to the Brickworks but is not reported as such)
- provides additional housing for Canberra (20.3%), and
- that it will provide more access for people to visit (19.4%) (again, this can only refer to the Brickworks but is not reported as such). “

This demonstrates why the glossy brochure is so misleading. Canberra residents should not be treated in this way. Another example is the Design principles in Section 4.6 of the strategy – there is no linkage between these sketches and ‘may’ statements and what will eventuate. Given the failure of the Kingston Foreshore project such emotive sketches and descriptions should not be used.

A sample of major issues

I do not intend to reiterate the very long list of serious concerns in submissions from a number of organisations representing inner south Canberra interests such as the Yarralumla Residents Association, Inner South Canberra Community Council, Deakin Residents Association, Inner South SEE-Change, and Weston Creek Community Council. The following is a small sample.

Density

Despite consistent and rational arguments to proceed more moderately, the LDA seems determined to squeeze the densest possible development onto the available land regardless of impact. The current proposal is the worst.

The estimated population of the proposal is greater than that of the existing Yarralumla suburb, which makes the development and surrounding area of town centre proportions without any of the facilities of a town centre, let alone the planning processes.

The proposed density is in the order of four times the average Inner South density – this negates any concept of the proposal being compatible with nearly any other area even in the broader Canberra area.

Compliance with ACT Government Strategies

The single sentence response as to how the proposal meets the ACT Government planning strategies is woeful and could be considered contemptuous.

Traffic and Transport

It is apparent that these elements are also outside the remit of the LDA given how, after so many attempts, it has only boosted the 2014 proposal following strong and rational criticism and still hasn't addressed, for example, peak hour traffic overflows, active transport such as safe on-road bicycle lanes and safe accessibility to the Adelaide Avenue trunk route. This further demonstrates the gulf between town plans and land marketers.

Landscape and environment

I am appalled by the SMEC reference to cut and fill to meet the proposed design. The ridges may have been the last remaining feature of what makes the site in landscape terms.

The removal of the critically endangered golden sun moth habitat must be taken into consideration given that it will require assessment under the Environment Protection and Biodiversity Conservation Act. I view any reference to the potential for offsets as of great concern because there is no guarantee of doing this sufficiently well nor in perpetuity.

The Yarralumla community is understandably very concerned about the loss of the 'desire line' walking trail. It could be a big selling point to retain this trail in recognition of its use.

I trust that the NCA will make a strong submission regarding the vista (buffers and ridges) from the Woden Valley and the downgrading of the ceremonial entry to the Governor General's residence.

In the context of compliance with ACT Government planning strategies, and despite the meaningless statements of compliance, there seems to be no attempt to incorporate water sensitive urban design, environmentally relevant construction and facilities, nor any attempt to address climate change.

In addition to the above the removal of so many mature trees gives the impression that a 'scorched earth' landscape will result, and that this will be accompanied, or followed by, significant disruption to the local community.

Conclusion

I can only reiterate that this whole development should be re-commenced, without the LDA's guidance.

Yours truly



4 April 2015

Griffith

[Redacted]

From: [Redacted]
Sent: Friday, 3 April 2015 5:34 PM
To: Brickworks
Subject: Submission on the Canberra Brickworks + Environs Planning and Development Strategy February 2015

Date: Friday 3 April 2015

To: Land Development Agency

Copied:

[Redacted]

[Redacted]

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[Redacted]

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[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

Dear Sir/Madam,

I have been involved in the Brickworks discussions for two decades. I live at [Redacted], Yarralumla ACT.

The original idea of renovating and making safe this area for community good, was that some residential development would meet some costs. To achieve this, a sensible balance was always sought. The current LDA proposal makes that premise redundant and irrelevant, as the strategy LDA have adopted is clearly

directed to making \$money for the LDA and building developers. Not only have community concerns have been repeatedly ignored, but in this latest proposal LDA appears to be taunting the community with its crude 'strategy' to *up the ante* and to increase the number of dwellings and resultant detriment to existing residents.

Community (>4,000 signature petition) have been dismissed by an undocumented phone survey. Some 1800 new residences will mean some 2500 new cars in this small area. Open space recreational areas will be lost. The trees gone, most of the ridge flattened and the small valleys infilled. Yes, it's a pathetically crude land grab. Would you want this and the resultant congestion in your living / recreational area?

In short, I fully support the YRA's Submission to the Land Development Agency of 1 April 2015 on the Canberra Brickworks and Environs Planning and Development Strategy February 2015, including its call for:

- A comprehensive traffic survey, with peer-reviewed modeling, of the existing suburb of Yarralumla, and adjacent suburbs to assess future traffic flows and impacts;
- The development's scale to be reduced to a level in keeping with the character of Yarralumla and site topography, with a mix of dwellings and heights (no more than 3-4 storeys);
- Retention of the current landforms, buffering of the development from the current suburb with connected natural parkland instead of a formal park along Denman Street, retention of continuous walking /cycling trails and of the golden sun moth and natural temperate grasslands within that corridor;
- A revised strategy for the Canberra Brickworks and Environs that is consistent with the National Capital Plan;
- Transparency from the ACT Government on costings for preservation and adaptation of the core Canberra Brickworks elements, and calls for establishment of a formal trust, with Government funding, empowered to raise funds from the private sector and public.

Yours sincerely,

[REDACTED]

[REDACTED]



ACT Heritage Council

Phone: [REDACTED]
 File ref: Yarra 1-102
 Contact Officer: [REDACTED]

Ms Kristi Jorgensen
 Land Development Agency
 Level 7 Transact House
 Dickson ACT 2602

Dear Ms Jorgensen

Canberra Brickworks & Environs – Planning and Development Strategy 2015

Thank you for the opportunity to comment on the *Canberra Brickworks and Environs Planning and Development Strategy, 2015* (the Strategy). The Heritage Council (the Council) provides the following comments in relation to the Strategy, specifically the *Conservation Development Strategy*, (the Conservation Strategy) at Appendix A of the Strategy.

The Council supports the primary heritage objective for the site, to establish a future use that ensures the physical conservation and retention of key heritage values in the longer term.

References to the *Australia ICOMOS Burra Charter, 2013* should be used rather than to the *Australia ICOMOS Burra Charter, 1999*.

The diagrams at page 8 of the Strategy are not clear on the extent of demolition around the Machine Bays. While the Conservation Management Plan (the CMP) does not preclude the demolition of skillion roof structures between the machine bays and the kilns, the retention of these roofs provides for continued interpretation of the development of the site and could provide space for activities associated with the adaptive reuse of the site. In relation to the machine bays, the CMP identifies the Machine Bays as supporting elements, and Conservation Policy 9 states “*Generally, retention of supporting elements is preferred however these elements provide greater flexibility than core elements with regard to change and alteration, particularly internally. Where alterations or changes are proposed, these should be guided by the policies and recommendations included in this report, and should have regard for the identified aspects of heritage significance both for the specific element and the values of the complex as a whole. A key consideration is the impact of any proposed change on the legibility and presentation of the complex as a whole.*” Additionally, the ACT Heritage Register Entry for the Precinct identifies the Machine Bays as Schedule 2 elements of moderate significance, and features intrinsic to the significance of the place. Justification for the demolition of these structures will still be required.

The Diagram on pages 12 and 21 (Section 4.1) of the Conservation Strategy suggests the possibility of the demolition of the Hardy Patent and Downdraft Kilns as part of Stage 3 development of the site. These elements should be retained and adapted as both are identified within the ACT Heritage Register Entry as Schedule 1 Elements of Exceptional Significance and features intrinsic to the significance of the place. While Conservation Policy 9 provides greater flexibility for the adaptation and intervention of these elements, justification of the proposed removal of these elements would be required before the Council would support their demolition.

The Conservation Development Strategy does not appear to address the potential future development on the site of the former Brickworks Accommodation Village. Requirement ii) f) of the Heritage Guidelines for the Brickworks states: "Development may occur on the site of the remains of the Brickworks Accommodation Village, subject to a detailed recording and suitable interpretation of the historical significance of the site". To date, this recording has not occurred. The Council will require this recording and interpretation before development of this area can be supported.

Policy 15 of the CMP states: "A predictive historical archaeological assessment should be undertaken for the study area and abutting sites. This study should identify the relative potential for sub-surface remains on the site and their likely nature and significance. Depending on the outcome of such a study, an Archaeological Management Plan should be prepared prior to any development or disturbance of the site". The Council notes that this has not yet been undertaken. This assessment should be undertaken as soon as possible to inform master planning for the site and will be required prior to the commencement of any works to the site.


The Council notes the proposed landscape treatment of the former Railway Remnants and Quarry and welcomes further discussion regarding Railway Remnants Park and Quarry Park as the project develops.

Please contact [REDACTED] if you would like to discuss this matter further.

Yours sincerely

[REDACTED]
Secretary (as delegate for),
ACT Heritage Council

2 April 2015


2 April 2015

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CANBERRA BRICKWORKS + ENVIRONS: PLANNING AND DEVELOPMENT STRATEGY

We wish to lodge the following comments on the ACT Land Development Agency's (LDA) revised Canberra Brickworks + Environs Planning and Development Strategy (CB+E Planning and Development Strategy) released in February 2015.

The LDA states that the revised Strategy responds to key community issues raised during the 2014 community engagement process. That claim beggar's belief as on nearly every issue of concern raised by the Community, the LDA has responded to the contrary, and not for the first time as you compare the 2011, 2014 and 2015 proposals. With each iteration the "Strategies" becomes worse.

The revised Strategy remains wholly unsatisfactory and we remain of the view that joining together the two separate proposals, to make safe the heritage Canberra Brickworks and the proposed high-density development of open parkland adjacent to Adelaide Ave, Denman St and Dunrossil Drive is a cynical attempt by the LDA to confuse and muddy the limited consultation that has been undertaken by the LDA.

The LDA suggests the revised Strategy reflects the outcomes from consultations undertaken to date. The actual outcome of Community consultation to date suggests some community support for limited restoration of the Brickworks but next to no support for the proposed residential development of the parkland. The following comparative analysis clearly demonstrate that the LDA continues to ignore the outcome of those consultations.

In 2011 **notwithstanding the general feedback from that consultation process** it is understood that the LDA finalised their intentions resulting in;

- The addition of new premises to accommodate 900-1100 dwellings = 2,500 residents approximately in what is currently parkland between Denman Street, Dunrossil Drive and Adelaide Avenue;
- With a mixture of single dwellings, double storey townhouses, three and four storey apartments and two storey mews type buildings;
- New shopping precinct near the present entrance to brickworks;
- 3-4 storey apartments in brickworks behind Woolls and Schomburgh Streets;

- The provision of extensive commercial premises in the vicinity of Novar and Denham St;
- Limited restoration of the Brickworks area; and
- New traffic to be separated from current roads with appropriate road design and an interchange at the Mint.

In 2014 **without any further consultation the LDA** has proposed the following;

- The addition of new premises to accommodate 1600 dwellings = 4,000 residents approximately in what is currently parkland between Denman Street, Dunrossil Drive and Adelaide Avenue; (note; the current population of Yarralumla at the last census was 2,992);
- With a mixture of townhouses and up to six storey apartments;
- A possible super market in West Deakin;
- 8 storey apartments near Adelaide Ave, Cotter Rd and the golf course;
- The provision 2 story residential premises in the vicinity of Novar and Denham St;
- Limited restoration of the Brickworks area has been abandoned and it is now proposes to make the site safe; and
- No new provision for expected significant increased traffic.

On every important measure the LDA had moved in the complete opposite direction to the outcomes of the 2010/11-consultation process. The Community was ignored and no explanation was provided for such a discourteous approach.

In February 2015, the LDA released the CB+E Planning and Development Strategy, which includes the following:

- 1,885 dwellings, an increase of over 400 dwellings on a 49 hectare site;
- The retention of 8 storey dwellings in Deakin, with a substantial number of 4-6 storey dwellings near Adelaide Avenue, next to the golf course and near the Cotter Road, with maximum 4 storey development in the remainder of the site;
- Mixed use precinct and parking located near the brickworks;
- Reduced number of dwellings in the Quarry behind Woolls and Schomburgh Streets and 2 storey residential development on Kintore Street;
- \$5m to be spent on conserving and adapting the Canberra Brickworks. However, there is no indication of the full cost of decontamination;
- Mint interchange reinstated;
- More parking in Bentham Street and near the Uniting Church;
- Provision of open space which will result in replacement of informal open green spaces by a formal Denman Park
- The loss of the formal entrance to Dunrossil Drive from Cotter Road for Government House.
- Revised traffic arrangements that will result in major, traffic impacts for adjoining streets e.g. Woolls, Abbott, Kintore and Novar Streets.

Once again the LDA has overwhelmingly ignored the extensive feedback from the Canberra Community and has continued to exacerbate the numerous problems previously highlighted by the Community. Seemingly a very perverse outcome from a so-called consultation process.

Canberra was recently judged as the most liveable city in the OECD. Why is the LDA so committed to ensuring that Canberra should lose that title? The current proposal is entirely inconsistent with the existing development within the Yarralumla/Deakin area resulting in a massive change in the existing environment and amenity of the area and as such does not have our support.

In the interest of proper consultation and fair treatment of the community the LDA must separate these two proposals so that each can be discussed and considered on their own individual merits.

We suggest the Yarralumla development proposal should consider the following;

- ❖ Character of Yarralumla suburb. Retention of Yarralumla as a residential suburb only. Any further development should be in keeping with the current character of the suburb, i.e. maximum two storey separated dwellings and wide street setbacks. Consider aged care and embassy development. Any redevelopment should be of such a small size it can be integrated into the existing suburb, i.e. not a separate enclave.
- ❖ Scale of development is too high. The proposed scale of development is too dense with certain adverse impacts on traffic, infrastructure, loss of recreation space and quality of life for residents, as well as issues in ensuring principles of sustainability are established. Any development should be no more than a 10% increase in the existing population of Yarralumla.
- ❖ Impact on Yarralumla and traffic. Lack of clarity and detail on the impacts on Yarralumla by surrounding developments – especially traffic. This includes developments in Deakin (most current being the Equinox building and the Hellenic Bowling Club), the Molonglo suburbs and the proposed mixed commercial development. We understand that anticipated traffic flows in the Revised Strategy are based on out-of-date traffic data.
- ❖ Overarching plan and sustainability compliance. Need for overarching plan for Yarralumla, which considers all aspects of planning and likely impacts. Particular attention to sustainability and preservation of current amenity.
- ❖ Inadequate, or no attention given to impact on, or provision of enhanced, shopping, health, child care, schooling, aged care, recreation and infrastructure facilities/services needed to service such an increase in the proposed population.

- ❖ Zoning of parkland. Current parkland should be zoned open urban space parkland for perpetuity.
- ❖ Green open space and Sun moth. Retention of green open space (buffer to the suburb as designed by Griffin) in its natural form with respect for existing walking tracks. Protection of the endangered Golden Sun Moth habitat and natural grasslands.
- ❖ THE LDA promote the creation of 5 new parks in support of the proposal, which in total are said to comprise around 7 hectares. They choose to ignore that they are removing something in excess of 49 hectares of current parkland.
- ❖ The loss of most trees, including windbreak for south western Yarralumla, due to “cut and fill”; loss of existing walking routes, native grasses and sun moth habitat and view lines to mountains is unacceptable. A key concern is the loss of up to 25% of Dunrossil Drive and its heritage listed trees, which will destroy the character of Dunrossil Drive and detract from the ceremonial entry to Government House. Such an outcome will largely destroy what is one of the most important ceremonial routes in Australia for the short-term commercial gain of the ACT Government and property developers.
- ❖ The LDA claim the proposal is “Breathing new life into the Brickworks”. It is clearly not doing that as it is only intended to make it the Brickworks site safe with consideration of further development of this aspect of the Plan not scheduled for 8 or 9 years

Comment on the Brickwork proposal can be made when the 2 proposals are separated and the scope for the LDA to misuse/confuse the comments received is eliminated.

Regards

(Signed and posted April 2015)

