

17 December 2007

Urban Design
ACT Planning and Land Authority
GPO Box 1908
Canberra ACT 2602

Forwarded via email: actpla.feedback@act.gov.au.

Dear Sir/Madam

**Braddon Commercial Area Planning Study
Draft Report 2007**

This submission is presented on behalf of [REDACTED]. Our clients are pleased to see that the Planning Authority is moving forward with this important initiative. We note that it is intended to be implemented in March 2008.

Your team has addressed a range of complex issues and has had to accommodate a variety of competing objectives. Our review of the report indicates that a very thorough approach has been taken and the proposals put forward are comprehensive. There are only two areas on which we would like to comment, being carparking and building height, as discussed below:

Building Height

The proposals for building height limits, as set out in the diagram on page 19, include 3, 4 and 6 storey areas. Blocks 8 and 9 of section 20 are shown to have a 4 storey limit. The explanatory note on the diagram says in part:

“Increase the maximum building height generally to 4 storeys...Allow the maximum height on some blocks, where it does not impact on solar access, to 6 storeys...”

Six storey height limits, extending one or two blocks from corners are proposed on the northern and southern ends of sections 28 and 29 and on the northern ends only of sections 20 and 21. The southern end of section 20 is very similar to the southern end of sections 28 and 29 and we propose that the six storey limit be applied to blocks 8 and 9 of section 20 in the same way that it is

applied to blocks 8 & 19 of section 28 and blocks 13 & 12 of section 29. The three sites are effectively identical.

We note that overshadowing is considered to be a key issue and that this is the basis for decisions on height allocation. It may be that you have considered that, because Eloura Street is narrower than Cooyong Street the overshadowing impact will be more severe. In particular we assume that it would be considered desirable to maintain high levels of solar access to the southern footpaths in Eloura Street including the outdoor eating at Coggans café.

We are able to advise that, even under the worst case scenario with a six storey building set back 3 metres from the boundary of block 9, there is no shadow on the Coggans eating area in mid-winter. We have prepared shadow diagrams to illustrate this which are attached for your review. The cross section in particular illustrates the fact that the outdoor seating area is free of shadow at midday in mid-winter. The diagrams have been prepared using Autocad 2008, configured for Canberra's latitude and longitude, and we are confident of their accuracy. In light of this information we trust that you will be able to apply the six storey limit to blocks 8 and 9, and do so with confidence that there will be no impact.

Carparking

We believe that a more positive statement on parking provision requirements would be helpful in achieving the intended planning outcomes. Braddon is an inner city location where non-private car transport modes are available and should be encouraged. The Canberra Sustainable Transport Plan, adopted as Government policy, strongly promotes this position. The "default" approach for any development proposal in Canberra, wherever located, is the rigid application of the Parking and Vehicular Access Guidelines. In our experience it is not usually possible to negotiate a relaxation of guideline parking requirements on the basis of good access to public transport or other factors.

This planning study and its recommendations should be more positive on this aspect. A recommendation that the Parking Guidelines should be applied in the context of the central location of Braddon and the need to encourage alternative transport modes would be very helpful and the Guidelines should be amended to reflect this.

Yours sincerely

[Redacted signature]

[Redacted name]

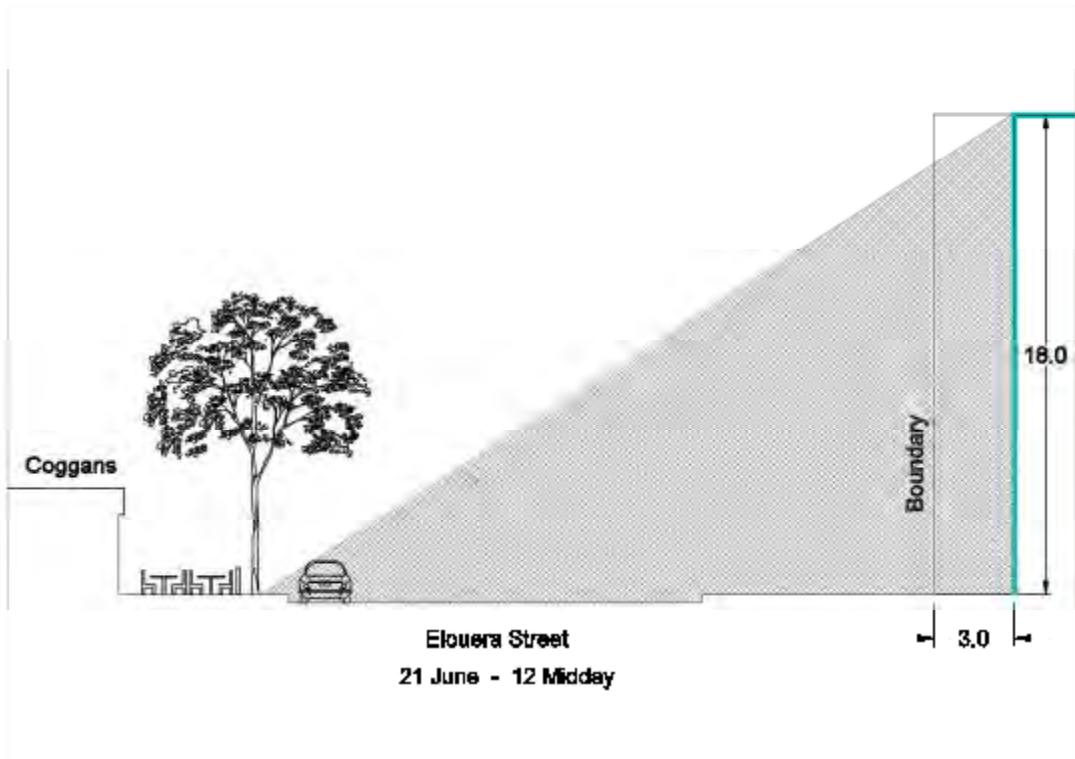
[Redacted address]

[Redacted contact information]

[Redacted phone number]

Attachments

ELOUERA STREET CROSS SECTION



SHADOW DIAGRAMS



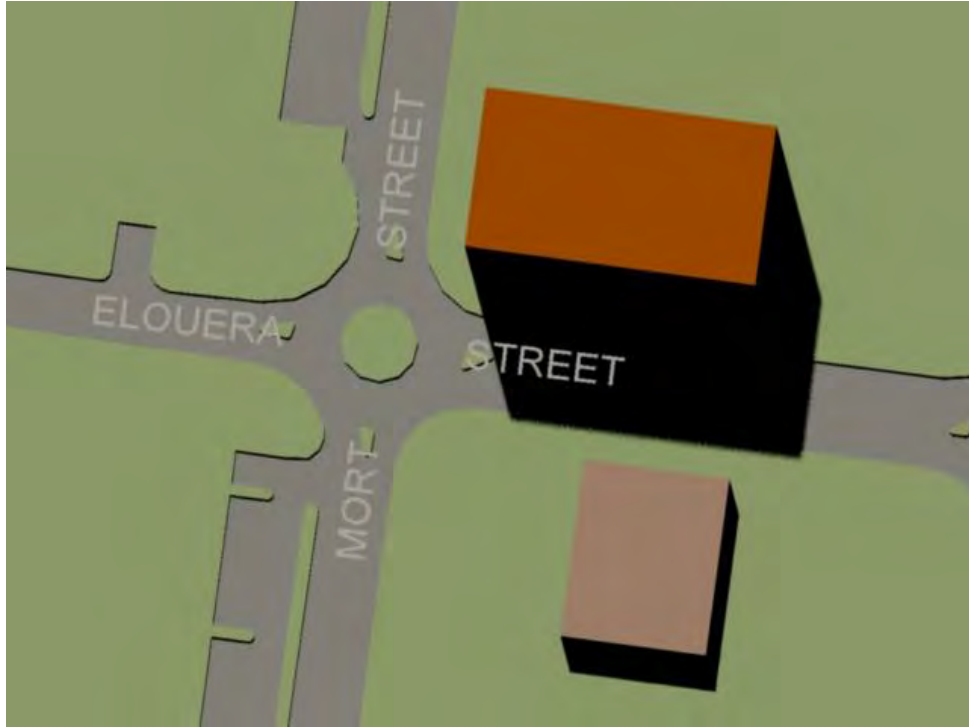
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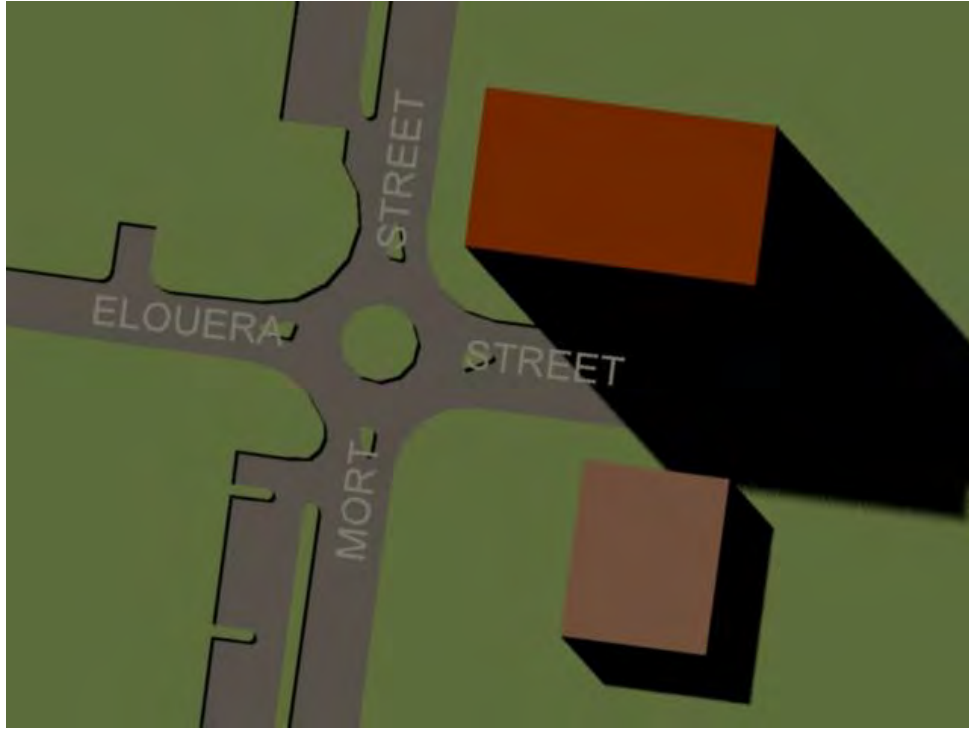
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21 JUNE - 3 PM



17 December 2007

Mr D. Brooks
Project Manager – Braddon Planning Review
ACT Planning & Land Authority
GPO Box 1908
CANBERRA ACT 2601

Dear Mr Brooks

Braddon Commercial Area Planning Study


Thank you for the opportunity to provide comment on the Braddon Commercial Area Planning Study.

support, in principle, the key recommendations contained within the Study, especially the increase in plot ratios and building heights to encourage redevelopment and we see Braddon as a key strategic area in providing a suitable mix of residential and commercial development close to Civic.

also represents a number of key stakeholders who have business interests in the area and are very keen to ensure that the longer term vision for Braddon is strategic and will deliver the best outcome for the area in its proposed built form.

Having reviewed the document, we do have some concerns regarding the perceived inflexibility of requiring residential use above the first level, as a mandatory requirement. supports a more flexible and performance-based approach to possible demands that may eventuate over time. sees a more flexible approach delivering more sustainable buildings, especially where a number of blocks are amalgamated. Tenants are now far more demanding and their ongoing demands have forced building designers and developers to produce more environmentally sustainable buildings. believes that there are great opportunities, given appropriate flexibility by the planning process to create quality, energy-efficient and sustainable developments in Braddon.

sees Braddon as an ideal opportunity for developing small businesses to gain access to affordable office space close to Civic and, specifically, office space that will provide visitors with the opportunity to gain short-stay parking close to that business destination. This type of office space is currently not available in Civic and it is very difficult, if available, to access it for short-stay visitation.



The primary intent for Braddon should be to create a precinct with active ground-floor industry users and active streets with restaurants and other inter-active types of businesses. [REDACTED] concern, again, is that mandatory residential above level one will be a significant component of any development and will be occupied by residential units that will not generate daily business activity. It is quite likely that the majority of these occupants will not be working in the Braddon area, but will be working in other larger employment-base areas like Civic or Belconnen. [REDACTED] supports a sensible mix of residential and commercial, but are conscious of the need to create a more dynamic business centre during the day to ensure that businesses are sustainable by ongoing patronage.

The requirement to include residential above the first floor level will do little, if any, to address the current housing affordability crisis, as mixed-use developments will require additional lift access to the upper levels and separate stairwells which add excessive costs to the unit-rate.

Concerns have been raised in the study regarding car parking for business and for potential residents. [REDACTED] again believes that a more flexible approach, where blocks can be amalgamated, may provide a greater opportunity to provide basement or under-croft car parking with rear lane access. This potential is not available on smaller, narrow blocks as a large portion of the allowable space is taken up with entry and exit ramps.

[REDACTED] also believes that there needs to be more flexibility with the plot ratio requirements, especially where blocks are amalgamated, to ensure that a potential developer can maximise site development and thereby create a more viable and sustainable development. Block amalgamation will also give greater flexibility with building envelope design. Therefore it is critical that there is flexibility within the system to deliver the best possible planning outcome.

In summary, [REDACTED] believes that careful consideration needs to be given when incorporating mixed-use residential as the dominant criteria for encouraging active participation. [REDACTED] encourages further dialogue with stakeholders and the Planning Authority to ensure that we create a sensible balance in an area that we believe will play a critical role in creating an active precinct close to Civic.

Yours sincerely

[REDACTED]

[REDACTED]



Dear [redacted]

Re: Final Braddon Commercial Area Planning Study

Thank you for your submission, dated 17 December 2007, providing comment on the Draft Braddon Commercial Area Planning Study.

The matters raised in your submission were considered in relation to the overall proposals for the precinct and matters raised by other submissions. This has resulted in several changes to the Final Braddon Commercial Area Planning Study, which will be available on the ACT Planning and Land Authority web site during early April.

The Final Planning Study has informed changes to City Centre Precinct Code of the restructured Territory Plan. These changes were agreed to by the ACT Legislative Assembly on March 6, 2008 and will commence with the new Planning System on March 31, 2008. The Territory Plan can be accessed now from the Legislation register at <http://www.legislation.act.gov.au/ni/2008-27/current/default.asp>

Yours sincerely

Chris Gell
Urban Design
ACT Planning and Land Authority
Ph. 6207 2642

27 March 2008

[REDACTED]

Dear [REDACTED]

Re: Final Braddon Commercial Area Planning Study

Thank you for your submission, received 17 December 2007, providing comment on the Draft Braddon Commercial Area Planning Study.

The matters raised in your submission were considered in relation to the overall proposals for the precinct and matters raised by other submissions. This has resulted in several changes to the Final Braddon Commercial Area Planning Study, which will be available on the ACT Planning and Land Authority web site during early April.

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Yours sincerely

Chris Gell
Urban Design
ACT Planning and Land Authority
Ph. 6207 2642

27 March 2008



Dear 

Re: Final Braddon Commercial Area Planning Study

Thank you for your submission, dated 11 December 2007, providing comment on the Draft Braddon Commercial Area Planning Study.

The matters raised in your submission were considered in relation to the overall proposals for the precinct and matters raised by other submissions. This has resulted in several changes to the Final Braddon Commercial Area Planning Study, which will be available on the ACT Planning and Land Authority web site during early April.

The Final Planning Study has informed changes to City Centre Precinct Code of the restructured Territory Plan. These changes were agreed to by the ACT Legislative Assembly on March 6, 2008 and will commence with the new Planning System on March 31, 2008. The Territory Plan can be accessed now from the Legislation register at <http://www.legislation.act.gov.au/ni/2008-27/current/default.asp>

Yours sincerely

Chris Gell
Urban Design
ACT Planning and Land Authority
Ph. 6207 2642

27 March 2008



Dear 

Re: Final Braddon Commercial Area Planning Study

Thank you for your submission, dated 16 December 2007, providing comment on the Draft Braddon Commercial Area Planning Study.

The matters raised in your submission were considered in relation to the overall proposals for the precinct and matters raised by other submissions. This has resulted in several changes to the Final Braddon Commercial Area Planning Study, which will be available on the ACT Planning and Land Authority web site during early April.

The Final Planning Study has informed changes to City Centre Precinct Code of the restructured Territory Plan. These changes were agreed to by the ACT Legislative Assembly on March 6, 2008 and will commence with the new Planning System on March 31, 2008. The Territory Plan can be accessed now from the Legislation register at <http://www.legislation.act.gov.au/ni/2008-27/current/default.asp>

Yours sincerely

Chris Gell
Urban Design
ACT Planning and Land Authority
Ph. 6207 2642

27 March 2008

[Redacted]
[Redacted]
[Redacted]

Dear [Redacted]

Re: Final Braddon Commercial Area Planning Study

Thank you for your submission, dated 10 December 2007, providing comment on the Draft Braddon Commercial Area Planning Study.

The matters raised in your submission were considered in relation to the overall proposals for the precinct and matters raised by other submissions. This has resulted in several changes to the Final Braddon Commercial Area Planning Study, which will be available on the ACT Planning and Land Authority web site during early April.

The Final Planning Study has informed changes to City Centre Precinct Code of the restructured Territory Plan. These changes were agreed to by the ACT Legislative Assembly on March 6, 2008 and will commence with the new Planning System on March 31, 2008. The Territory Plan can be accessed now from the Legislation register at <http://www.legislation.act.gov.au/ni/2008-27/current/default.asp>

Yours sincerely

Chris Gell
Urban Design
ACT Planning and Land Authority
Ph. 6207 2642

27 March 2008



Dear 

Re: Final Braddon Commercial Area Planning Study

Thank you for your letter, received 24 December 2007, which was forwarded to the ACT Planning and Land Authority by the Planning Minister, Mr Andrew Barr, as a submission providing comment on the Draft Braddon Commercial Area Planning Study.

The matters raised in your letter were considered in relation to the overall proposals for the precinct and matters raised by other submissions. This has resulted in several changes to the Final Braddon Commercial Area Planning Study, which will be available on the ACT Planning and Land Authority web site during early April.

The Final Planning Study has informed changes to City Centre Precinct Code of the restructured Territory Plan. These changes were agreed to by the ACT Legislative Assembly on March 6, 2008 and will commence with the new Planning System on March 31, 2008. The Territory Plan can be accessed now from the Legislation register at <http://www.legislation.act.gov.au/ni/2008-27/current/default.asp>

Yours sincerely

Chris Gell
Urban Design
ACT Planning and Land Authority
Ph. 6207 2642

27 March 2008



Dear [REDACTED]

Re : Final Braddon Commercial Area Planning Study

Thank you for your submission, dated 20 November 2007, providing comment on the Draft Braddon Commercial Area Planning Study.

The matters raised in your submission were considered in relation to the overall proposals for the precinct and matters raised by other submissions. This has resulted in several changes to the Final Braddon Commercial Area Planning Study, which will be available on the ACT Planning and Land Authority web site during early April.

The Final Planning Study has informed changes to City Centre Precinct Code of the restructured Territory Plan. These changes were agreed to by the ACT Legislative Assembly on March 6, 2008 and will commence with the new Planning System on March 31, 2008. The Territory Plan can be accessed now from the Legislation register at <http://www.legislation.act.gov.au/ni/2008-27/current/default.asp>

Yours sincerely

Chris Gell
Urban Design
ACT Planning and Land Authority
Ph. 6207 2642

27 March 2008

[Redacted]
[Redacted]

Dear [Redacted]

Re: Final Braddon Commercial Area Planning Study

- [Redacted]

Thank you for your submission, dated 12 December 2007, providing comment on the Draft Braddon Commercial Area Planning Study.

The matters raised in your submission were considered in relation to the overall proposals for the precinct and matters raised by other submissions. This has resulted in several changes to the Final Braddon Commercial Area Planning Study, which will be available on the ACT Planning and Land Authority web site during early April.

The Final Planning Study has informed changes to City Centre Precinct Code of the restructured Territory Plan. These changes were agreed to by the ACT Legislative Assembly on March 6, 2008 and will commence with the new Planning System on March 31, 2008. The Territory Plan can be accessed now from the Legislation register at <http://www.legislation.act.gov.au/ni/2008-27/current/default.asp>

Yours sincerely

Chris Gell
Urban Design
ACT Planning and Land Authority
Ph. 6207 2642

27 March 2008

ACT Planning and Land Authority
GPO Box 1908
Canberra ACT 2602

16th December 2008

Re: BRADDON COMMERCIAL AREA REZONING

[REDACTED] I wish to comment on the 'Braddon Commercial Area Planning Study Draft Report', as part of the consultation process from November 14 to December 17, 2007 as advertised on your website. There are some major inconsistencies in this report which need to be considered before any amendments to the Territory Plan are made. In particular, the stated objectives of 'increasing diversity of uses' and 'increasing development opportunities that are consistent with the character of Braddon', cannot be met by the recommendations of the draft report which limit street frontage and number of storeys.

The six metre maximum street frontage proposed on page 26 would not be practical for encouraging effective redevelopment. The resultant shop size would be six metres wide by approx 45 metres deep; long and very narrow, restricting prospective retailers. [REDACTED] is occupied by *Officeworks* and takes up the whole street frontage, as does *1 Choice Liquor* at the end of Mort Street. A number of other enterprises, both retail and service, have similar land requirements.

It is impractical to limit new tenants to only a six metre street frontage; businesses require flexibility in choice of premises size to remain successful. The proposal to limit shop size will reduce the likelihood that businesses can remain successful, resulting in higher business closures and shop vacancies. The 'Braddon Commercial Area Planning Study Draft Report' (page 8) states that 'Future development must not limit opportunities for service trade uses to remain in the area' and on page 18 that 'Buildings (are) to have a capability for change and be able to accommodate a variety of functions-future adaptability and diversity require flexible building spaces' and that a mix of uses need to be encouraged. Uniformly limiting ground floor tenancy frontages to six metres as proposed on page 26 will not fulfill these objectives.

The draft report discusses the retention of solar access to the east side of Mort and Lonsdale streets. However the nine storey constructions to the west on Northbourne Avenue, are already determining the level of incoming sun, so the blocks closest to Civic on Mort Street can be rezoned to six storeys (not four as proposed), without impeding incoming afternoon sunlight.

The west facing view of virtually all of Mort Street is long stay, paid car parking backed by nine story buildings on Northbourne Avenue, therefore redevelopment will best be encouraged by rezoning the whole of Mort Street to six story development, not just the corner blocks. The Haig Park Pine Break is a perfect buffer at the end of the high rise development in Braddon. The logical height progression to meet the report's stated objectives and encourage cohesive redevelopment while maintaining Braddon's character is nine storeys on Northbourne Avenue, six storeys Mort Street,

six storeys on the west side of Lonsdale Street, four storeys east side of Lonsdale Street and three storeys in Torrens Street.

It is clear that the land available in the city area is very limited and much sought after and restricting the height of the buildings along the inner city section of Mort Street to four storeys will limit redevelopment due to the high cost of building for the potential return. Future inner city needs as Canberra continues to grow will not be able to be met.

A suitable mix of uses for the six story locations on Mort and Lonsdale streets as I propose here could be the first three storeys designated as commercial and offices and the other three residential, giving more people the opportunity to live in the city as Canberra continues to grow. This approach would encourage mixed uses and follows the stated objectives of the 'Braddon Commercial Area Planning Study Draft Report'.

The setback for the upper levels in Lonsdale Street is a good proposal, as the large trees which divide the road give a boulevard feel down Lonsdale Street. The proposed building set-back for the upper levels need not apply in Mort Street as the only view west across the road is over long stay car parks and nine story buildings.

The draft report states that the character of Braddon needs to be maintained, however it would be inconsistent with this report and limiting to future redevelopment as Canberra's population grows to allow a nine story development in Turner and then limit the height to four storeys in Mort Street, which is virtually in the city.

The city should be exactly that, 'a city'; high-rise is a fact of life. Allowing people the freedom to live and work in the city overcomes transport and parking problems. The gradual move to apartment style living has much less impact on the environment and allows more free time for leisure activities.

Braddon needs to be rezoned such that six-storey buildings surround the heart of the city, leading from the eight storey heart of the city, down to four and three storey developments on the periphery of the city. The 'Braddon Commercial Area Planning Study Draft Report' proposes an inconsistent approach, with six storey construction in areas that are furthest from the heart of the city (Girrawheen Street), and four storeys closest to the city (mid-Mort Street), limiting future growth of the city centre and resulting in a patchy skyline.

I do hope these suggestions will be seriously considered as part of the consultation process and look forward to effective redevelopment that will revitalize Canberra's growing city centre.

Sincerely,

A large grey rectangular area redacting the signature and name of the author.



**BRADDON COMMERCIAL AREA
PLANNING STUDY DRAFT REPORT**



ACT Planning and
Land Authority

December 17 2007

BRADDON COMMERCIAL AREA PLANNING STUDY DRAFT REPORT
RAIA submission prepared by

INTRODUCTION

The context of the area known as the Braddon Commercial area has changed significantly since the current controls were written. This review is welcomed as an opportunity for the Braddon Commercial area to grow and to build on the characteristics that make it unique.

LANDUSE

supports the policy that the Braddon Commercial precinct should remain an area for service businesses that service the entire City Centre and the inner north community. This includes car sales, garages, printers, small professional offices etc. The precinct needs to be seen as a part of the whole City Centre and not a stand alone discrete area, as implied in the Braddon Neighbourhood Plan objectives.

recommends the following be considered:

Residential Development - Appropriateness of residential development throughout this area needs careful consideration in terms of its compatibility with current uses.

The Government must be confident that inclusion of residential in the mix will not, over time, inhibit other service sector uses in the area. Planning controls for the precinct will need to provide for the operation of the businesses, including out of hours servicing and the like, to ensure a genuinely mixed use environment will continue.

There is already significant residential development on the east and west perimeter and under the Section 84 Masterplan to the south and this may be appropriate to retain as the primary model.

Duplication of services - Permitting supermarket development and the like when there are major supermarkets and stores within easy walking distance could undermine the relationship to the rest of the City Centre by duplication.

BUILT FORM

The nature of the area as a service business location needs to be considered in setting any planning controls. The current “vibrancy” of the area comes from the market driven variety of uses and the mix of frontage types.

Tenancy frontage

The 6m width limit on tenancy frontage is inappropriate to some existing and some likely users potentially making it impossible for the mix of uses, that add to the character of the area, to continue to operate here. For example, car sales could easily take up the existing frontages occupied within a denser development. Wholly indoor salerooms for cars are common throughout city centres worldwide however they are based on display of products, necessitating appropriate sized frontage. In addition many of the existing restaurants and stores currently have wider frontages which suit indoor outdoor connections and display of products.

A variety of frontage widths should be permitted and encouraged as, supported by a robust streetscape structure, it would maintain the mix of diverse uses and provide enhancement of the public realm.

Building heights - Torrens Street

Building height restrictions to 3 storeys on Torrens Street seems excessive given that most development opposite is already 3 storeys. Stepping up one storey to give 4 storeys in a mixed-use context is more likely to support lift accessed office & residential development.

Streetscape design controls

Streetscape design controls need be agreed with all relevant ACT Government departments to ensure that services, awnings, large street trees and lights are managed and can coexist. Current attitudes towards tree management tend to restrict the planting of large-scale trees where there are awnings required. The capacity to manage larger trees by selective pruning, as is done in cities like Berlin to facilitate their planting, needs to be considered.

PARKING

The parking numbers required or permitted for development in this area should be considered with regard to policies that support Public Transport.

To facilitate this [REDACTED] recommends the following be considered:

- Public Transport links to a frequent daytime circuit throughout the City Centre (similar to the CAT bus system in Perth),
- Local parking control regimes to ensure limited parking does not just displace cars to the surrounding areas,
- Retention of extensive on-street short stay parking to support business activity, and
- Street section design that reflects the commercial nature of the area in balancing pedestrian amenity with serviceability.

CONCLUSION

The review of controls in Braddon with a view to increasing the development potential, improving the public realm and supporting a wide range of uses of the area is welcomed.

The planning for Braddon should form part of an overall City Centre master plan and be linked to a comprehensive Public Transport plan that includes a high level of daytime connection from this area to the rest of the City Centre.

[REDACTED] recommends the work done on the Braddon Area and the comments received be used to inform consideration of the role of Braddon in an overall master plan for the City Centre, as well as modifications to local planning controls for the area.



Monday, 17 December 2007

Urban Design
ACT Planning and Land Authority
GPO Box 1908
DICKSON ACT 2602

Dear Sir

Braddon Commercial Area – Draft Planning Study

This submission is in response to the invitation to comment on the draft planning study. We act for

This is a large, amalgamated site which if redeveloped would contribute greatly to the revitalisation of the precinct, with the ability to act as a demonstration of sustainable and innovative urban design, consistent with its intended role as a mixed use adjunct to the CBD.

My clients and I have had numerous discussions with the Authority over a period of 4 to 5 years about various redevelopment concepts for the site. On the whole, the response to these concepts has been favourable, but until the release of the current draft report, there seems to have been no tangible progress by the Authority in reviewing the existing, outdated policy. It was particularly disappointing to note that the new draft Territory Plan continued to mandate the current restrictive building height and plot ratio controls.

My clients were therefore please to note that draft Planning Study has taken the opportunity to propose a new planning and design framework for the precinct, which should encourage new development, redevelopment and refurbishments, consistent with an enhanced mixed use role in the changing inner city. We believe the new policy direction is in the best interests of the community who use the area, government, property owners and business. We strongly support the policy direction contained in the draft Planning Report, but wish to make the following specific comments relating to Part A (3) – CZ3 Service Zone, Braddon.

R1.1.1 and R1.1.2 (Restriction on Use)

The Rules provide a very prescriptive land use mix, whilst the Criteria state that this is a Mandatory requirement, which would seem to suggest that there is no flexibility for a merit assessment. In effect this restricts the first floor of any new development to Office or Other Non Retail Commercial uses and



[REDACTED]

the second floor and above to Residential Use. There is no explanation of the rationale for this inflexible land use arrangement, other than to suggest there is an amenity issue related to the immediate juxtaposition of retail and residential activity.

At various meetings with the Authority and at a meeting with the Minister on 17 July 2007, my clients advised of the strong unmet demand for private office space, driven mainly by a need for professional suites for lawyers, accountants, architects, engineers, medical and para medical practices, IT and research companies etc. The demand for individual suites may vary from 100m² to 1000m² and above and in my clients view the total demand would certainly exceed the available space provided by one floor of any new building on their site.

All the new major projects are targeting Commonwealth Departments and Agencies and provide little or no opportunity for private office use. Even if the opportunity did exist, many professional practices are not attracted by the anonymity of a small part of a CBD office building.

The Braddon Commercial Precinct provides an ideal opportunity to meet these types of needs, particularly given the identity which can be achieved and the benefits to be gained from co-location. These types of uses lend themselves to a highly articulated building form and most have a high level of customer and client interaction.

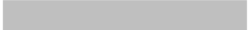

Our view is therefore that Rule R1.1.2 needs to be removed or amended to allow lessees the freedom to respond to market requirements in a flexible manner, whilst recognising the need to retain street level frontages for active uses. If some residential activity is considered desirable in every building for social reasons, then it could be achieved in a less prescriptive way through an appropriate performance measure, i.e. there should be relevant criteria for merit assessment.

R2.1.1 (Height)

The Rules prescribe a 4 storey height limit [REDACTED] Criteria C2.1.1 (b) requires building height not to cause detrimental impacts including overshadowing and excessive scale. We note from Figure 2 at Appendix E however that a 6 storey height limit applies on the southern frontages of the Lonsdale Street and Eloura Street intersection, i.e. [REDACTED] There is no analysis in the document to suggest that the “overshadowing and excessive scale” criteria differs on one side of the intersection compared to the other. Our own analysis suggests that the impacts are manageable on all sites in this vicinity, irrespective of whether the height is 4 storeys or 6 storeys, particularly if there is some additional set back on the 5th and 6th floor frontages. It is also my client’s view that there should be some recognition in the Rules of the benefits of the comprehensive development outcome which can be produced on a large amalgamated site, e.g. 3 blocks or greater. An additional, alternative approach would be to allow the additional two floors, subject to the overshadowing, excessive scale and amalgamated site test, when the additional development is used for residential purpose only.

We request therefore that you review the 2.1 Height provisions [REDACTED] in a manner that facilitates and encourages a high quality urban design outcome, consistent with your broader objectives and vision for the precinct, in the form of an articulated, fine grain, mixed use, mixed

[REDACTED]



height (up to 6 storeys) development. The current proposed provision runs the risk of producing a bland, monotonous, 4 storey box.

2.2 Plot Ratio

Rule R2.2.1 appears to allow a plot ration of 3 to 1, where one third of the building is used for residential use. Our own view is that plot ratio is an unnecessary restriction and is a dated planning tool derived in the 1960s when planning controls were based on almost entirely quantitative rather than qualitative criteria. Given all the Rules and Criteria proposed for the precinct, including building height and set backs, there would appear to be no additional value to be gained from the imposition of a plot ratio control.

Developments in other Major centres, including civic and the Town Centres, are generally not subject to any plot ratio control in the Territory Plan and its retention in the Braddon Commercial Precinct would seem unwarranted.

My client suggests therefore that the plot ratio provisions be removed, but if they are to be retained, the plot ratio should be increased commensurate with other comments above about increased building height.

My clients request therefore that all the specific comments above be taken into account and the documents amended accordingly.

Yours faithfully



Braddon Planning Study
List of Submissions

No.	Organisation	Person
1	Roads ACT	Karl Cloos
2	Individual	[Redacted]
3	[Redacted]	[Redacted]
4	Individual	[Redacted]
5	ACTPLA Leasing	Dulce Landers
6	TAMS Environment protection	Helen McKeown
7	ACTEW sewer & water	Des Allen
8	Individual	[Redacted]
9	[Redacted]	[Redacted]
10	Individual	[Redacted]
11	[Redacted]	[Redacted]
12	[Redacted]	[Redacted]
13	[Redacted]	[Redacted]
14	[Redacted]	[Redacted]
15	[Redacted]	[Redacted]
16	[Redacted]	[Redacted]
17	[Redacted]	[Redacted]
18	Individual	[Redacted]
19	Individual	[Redacted]
20	[Redacted]	[Redacted]
21	Individual	[Redacted]
22	Individual	[Redacted]



Dear [redacted]

Braddon Commercial Area Planning Study

Thankyou for your letters dated 10 and 19 September 2007 regarding the Braddon Commercial Area Planning Study.

The issues you have raised, including introducing performance measures to enable flexibility with height controls and methods of addressing the potential short stay parking deficiency are important. We will consider your comments during the consultation period for the Planning Study.

Thankyou for your continued interest in the study.

Yours sincerely

Doug Brooks
25 September 2007

Fiona, Ruth

From: Cloos, Karl
Sent: Friday, 16 November 2007 11:21 AM
To: Gell, Chris
Cc: [REDACTED]
Subject: RE: The Braddon Commercial Area Planning Study - Draft Report

Chris

Thank you for the message regarding the seeking of comments on the above report.

Unfortunately due to lack of resources and higher priorities I will not be providing comments to the report.

Regards

Karl Cloos
Manager Asset Management Planning
Roads ACT
Office of Transport

[REDACTED]

From: Gell, Chris
Sent: Thursday, 15 November 2007 11:48 AM
To: [REDACTED]
Subject: The Braddon Commercial Area Planning Study - Draft Report

The Draft Braddon Commercial Area Planning Study was released for public comment yesterday by the Minister for Planning.

The study proposes changes to the building controls aimed at increasing the incentive for redevelopment, while retaining and enhancing the area's character and mix of uses.

The period for comment will close on 17 December 2007. It is intended to incorporate the changes to the building controls (as detailed at Appendix E in the study) into the new Territory Plan, prior to its release in early 2008. This will be subject to comments received during the consultation period.

Your comments regarding the study and proposed changes to the building controls will be valuable.

Please email any comments either directly to myself or to actpla.feedback@act.gov.au ; or
 post to Urban Design, ACT Planning and Land Authority, GPO Box 1908, Canberra ACT 2602; or
 hand-deliver to the Authority's Dickson Customer Service centre at 16 Challis Street, Dickson;

Below is a link to the study, available on the ACT Planning and Land Authority's website

[Braddon Commercial Area Planning Study Draft Report \(PDF 1.1Mb\)](http://www.actpla.act.gov.au/_data/assets/pdf_file/0019/6715/Braddon_Commercial_Area_Planning_Study.pdf)
<http://www.actpla.act.gov.au/_data/assets/pdf_file/0019/6715/Braddon_Commercial_Area_Planning_Study.pdf>

Thank you.

Chris Gell

Urban Design
ACT Planning and Land Authority
p: 6207 2642
e: chris.gell@act.gov.au

Fiona, Ruth

From: Baxter, Rod
Sent: Monday, 19 November 2007 2:48 PM
To: Brooks, Doug; Gell, Chris; Williamson, Gay
Subject: FW: Braddon Commercial Plan

-----Original Message-----

From: Hart, David **On Behalf Of** ACTPLA Feedback
Sent: Thursday, 15 November 2007 8:49 AM
To: Baxter, Rod
Subject: FW: Braddon Commercial Plan

Rod

I understand that feedback in relation to the Braddon Plan is to be directed to your area. The following was received through the website.

Provided for your information.

Thank you

David Hart

Customer Feedback Unit
ACT Planning and Land Authority
Phone 62072035
E-mail david.hart@act.gov.au

-----Original Message-----

From: [REDACTED]
Sent: Thursday, 15 November 2007 8:35 AM
To: ACTPLA Feedback
Subject: Braddon Commercial Plan

Dear ACTPLA,

I think the proposals for Braddon Commercial Area are all excellent and will give a "European" feel to the locality. I am a strong supporter of "mixed" development, as has been introduced in parts of Dickson.

Sincerely,

[REDACTED]

Our Ref: [REDACTED]

Your Ref:

Tuesday, 20 November 2007

Urban Design
ACT Planning & Land Authority
GPO Box 1908
CANBERRA 2601

Dear Sirs

BRADDON COMMERCIAL AREA PLANNING STUDY

We act for the registered proprietor of [REDACTED]

Page 19 of the Draft Report proposes to increase the maximum building height to 4 stories generally, with a 3:1 building ratio. But in the blocks along the West side of Torrens Street, the height is to be limited to 3 stories with a 1:1 plot ratio. In effect this means there will be no consolidation of sites between Lonsdale St and Torrens St.

In our submission it would be much more sensible to have a uniform maximum building height and plot ratio for all blocks bounded by Lonsdale St and Torrens St.

There is no prospect that we would redevelop [REDACTED] if we were only permitted 1 story extra, so what will happen is that the existing small 2 story buildings will stay until the end of their economic life, and will be overshadowed by a string of narrow 4 story buildings along the Lonsdale St frontage. This is not good planning.

As the study notes, the development along the East side of Torrens St has been 3 stories, with massive consolidated sites. Its residents have looked down on our 2 story buildings for a decade now. A one story difference has not affected the streetscape. So why not allow 4 story buildings on the West side of the Street, and thus achieve consistency throughout the whole of the sites bounded by Lonsdale St and Torrens St?

We strongly object to the notion of 4 story buildings to the West of our 2 story building. Whatever the plot ratio and the maximum building height you decide



[REDACTED]

upon, it should be consistent for all blocks bounded by Lonsdale St and Torrens St. We would not object to 3 stories maximum, provided the same plot ratio and height applied to all blocks.

We further note that the consistency we seek, would make it much easier to arrange satisfactory underground carparking, with consolidated blocks for development.

[REDACTED]

Fiona, Ruth

From: Baxter, Rod
Sent: Thursday, 29 November 2007 4:25 PM
To: Gell, Chris
Subject: FW: Braddon Proposal [SEC=UNOFFICIAL]

Can you look at this one please Chris?

Thanks

Rod

-----Original Message-----

From: Hart, David **On Behalf Of** ACTPLA Feedback
Sent: Thursday, 29 November 2007 2:52 PM
To: Baxter, Rod
Subject: FW: Braddon Proposal [SEC=UNOFFICIAL]

Rod

The below feedback has been provided in relation to the Braddon Plan, for your information and action as required.

Thank you

David Hart

Customer Feedback Unit
ACT Planning and Land Authority
Phone 62072035
E-mail david.hart@act.gov.au

-----Original Message-----

From: [REDACTED]
Sent: Thursday, 29 November 2007 1:37 PM
To: ACTPLA Feedback
Subject: Braddon Proposal [SEC=UNOFFICIAL]

I would like to comment on the redevelopment of Braddon.

I have read through the submission and fully support it. If it does go ahead, I would like to open up a business in that area.

There was mention of the old Telstra exchange building. What is currently being done with it?

[REDACTED]

[REDACTED]

[REDACTED]

[Redacted text block]

[Redacted text block]

[Redacted text block]

[Redacted text block]

Fiona, Ruth

From: Lander, Dulce
Sent: Friday, 30 November 2007 12:50 PM
To: Gell, Chris
Subject: RE: The Braddon Commercial Area Planning Study - Draft Report

Chris

Looks good, no comments.

Dulce

Dulce Lander | Principal Officer | Leasing Section | Development Services Branch | ACT Planning & Land Authority |
Ph: (02) 6207 2112 | **Fax:** (02) 6207 1862 | **email:** dulce.lander@act.gov.au <<mailto:dulce.lander@act.gov.au>>

-----Original Message-----

From: Gell, Chris
Sent: Thursday, 15 November 2007 11:48 AM
To: [Redacted]

Subject: The Braddon Commercial Area Planning Study - Draft Report

The Draft Braddon Commercial Area Planning Study was released for public comment yesterday by the Minister for Planning.

The study proposes changes to the building controls aimed at increasing the incentive for redevelopment, while retaining and enhancing the area's character and mix of uses.

The period for comment will close on 17 December 2007. It is intended to incorporate the changes to the building controls (as detailed at Appendix E in the study) into the new Territory Plan, prior to it's release in early 2008. This will be subject to comments received during the consultation period.

Your comments regarding the study and proposed changes to the building controls will be valuable.

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 post to Urban Design, ACT Planning and Land Authority, GPO Box 1908, Canberra ACT 2602; or
 hand-deliver to the Authority's Dickson Customer Service centre at 16 Challis Street, Dickson;

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<http://www.actpla.act.gov.au/_data/assets/pdf_file/0019/6715/Braddon_Commercial_Area_Planning_Study.pdf>

Thank you.

Chris Gell

Urban Design
ACT Planning and Land Authority
p: 6207 2642
e: chris.gell@act.gov.au

Fiona, Ruth

From: Brooks, Doug
Sent: Wednesday, 12 December 2007 8:39 AM
To: Gell, Chris
Subject: FW: Braddon Commercial Area Planning Study

[Log into consultation schedule](#)

Doug Brooks

Urban Design Section
Planning Services Branch
ACT Planning and Land Authority

P: 02 6207 1817
F: 02 6207 5513
E: Doug Brooks@act.gov.au

-----Original Message-----

From: McKeown, Helen
Sent: Tuesday, 11 December 2007 11:02 AM
To: Brooks, Doug
Subject: Braddon Commercial Area Planning Study

Doug

The Environment Protection Unit has reviewed the Planning Study for the Braddon Commercial Area and has no comment to provide. Please note that we prefer to receive these documents prior to their release for public comment so any issues are addressed prior to the public seeing the documents

Helen McKeown
Conservator Liaison and Environment Coordination
Environment and Recreation

phone: 6207 2247 fax: 6207 2316



12 December 2007

The Manager, Urban Design
ACT Planning and Land Authority
G P O Box 1908
CANBERRA ACT 2602

**Braddon Commercial Area – Planning Study
Comments by ActewAGL on Water Supply & Sewer**

I refer to your Planning Study, which is currently out to public comment. ActewAGL comments with respect to water supply and sewer infrastructure are as below. ActewAGL acts as agent for ACTEW Corporation, the owner of these assets.

ActewAGL had already forwarded broad comments to you in August 2007, and these are further clarified here.

Sewer

- The two sewer mains through the area are over loaded and steps had already been taken by ACTEW in the form of a linking sewer upstream, to relieve high flows from one sewer passing through the area. The proposed redevelopment are expected to bring higher sewer loads, and to consider this properly a more detailed study needs to be undertaken. It is likely that the sewers will need to be upsized however.
- The sewers could be re-located into the public verge (or street) but the changeover from rear of blocks to the front would need to be on a progressive basis as each block is redeveloped, in a piecemeal or uncontrolled manner. To re-locate the sewer on a holistic basis, say for each Section and then require each new development to re-connect, would not be practical as internal drainage of blocks is oriented to the existing mains at the rear.
- Note that the engineering aspects and costs of relocating the sewers to the public verge have not been investigated.
- The sewers will need to remain in the rear of blocks and access alongside each block and along the sewer alignment will therefore be required. It is noted that this access is not provided in all proposed development situations, eg Appendix

E Figures 1, 3, and this is not acceptable to ACTEW Corporation. Alternatively, a continuous rear lane of adequate width should be provided.

- Overland spill flows should also be permitted from property to property along the rear boundary, which is in accordance with the agreement with ACTPLA in the other New Territory Plan categories.
- Notwithstanding the above, there are easements over all existing sewer mains passing through the blocks. Buildings or private services will not be allowed within these easements, and special conditions will apply to the construction of buildings adjacent to the easements.
- The above concerns about access and overland flows would also be similar for TaMS owned stormwater assets.
- There are also other aspects that would need to be addressed for each individual development, such as location of grease traps, overflow relief gullies, and water meters, all to be within the property boundaries.

Water Supply

- The sizes of existing water mains and hydrant spacings are adequate for the current development. However, subject to ACTFB requirements, there is likely to be a need for additional hydrants associated with each building development, and there may be a need to upgrade the size of mains. This latter point is particularly relevant to 6 storey developments proposed for certain blocks.
- The extent of upgrading of a main may extend along the street beyond a specific block frontage, in order to increase fire capacity to that block.

I trust the above is satisfactory, and would be happy to clarify any points if you wish.

Yours faithfully



Des Allen
Manager Water Supply System Development

Fiona, Ruth

From: [REDACTED]
Sent: Sunday, 16 December 2007 9:29 PM
To: ACTPLA Feedback
Subject: Braddon Commercial Plan - Comment

Dear ACT Planning

Firstly, thank you for the opportunity to comment on the Braddon commercial plan.

I support ACT planning taking measures to encourage commercialisation, including re-zoning of the area. It is important, however, that the area retains its boutique character as this is its key feature which will attract people.

I do not support six storey buildings on Elouera street. The six storey buildings at the beginning and end of Lonsdale street will act as gateways to the areas. Building higher buildings in the middle could act as cutting of the street in two parts, rather than creating a longer thoroughfare.

Further – it would be great to see a similar plan for the City Walk area in Civic which is also in need of re-development.

While out to the scope of this study, the Northbourne Oval site could be improved significantly. Its heritage listing is in recognition of its historical significance in Canberra's history, but retaining it as an inaccessible and drab looking oval means that the space is underutilised. It could be developed as a public space such as...outdoor cinema in summer, garden (an extension of the botanical gardens perhaps), Christmas markets and some residential or commercial development. It would also be great to see a plan for this area.

Regards

[REDACTED]

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Fiona, Ruth

From: [REDACTED]
Sent: Sunday, 16 December 2007 1:56 PM
To: ACTPLA Feedback
Subject: Braddon Commercial Area planning study feedback

Hello. My name is [REDACTED] and i've lived in Canberra for 23 years. I work in Braddon and will soon be buying a property in that area.

I've read the Braddon Commercial Area planning study closely and found it very interesting. The obvious implications of it are that it will be disasterous for parking in the area. Page 15 says 'Parking is a significant issue to address' but there is essentially nothing in the plan that addresses it, for the better. there are definitely several things that are terrible for it.

* Page 21 says that 'New buildings will be built to the front boundary, removing the ability to park in front of buildings.'

* Redevelopment of the Braddon club would reduce one of the largest parking areas there.

* Worst of all the increased height restrictions obviously will massively increase traffic and parking demand in the area, at the same time as available parking will be reduced. This is obviously madness. Parking and traffic around Braddon is already terrible and I find it unimagineable that this report could have been written by people with much experience of it.

I'm sure builders, developers and land owners will be very enthusiastic about it but this plan is an obvious disaster for all the normal people who will be living and working around there. As one of them I strongly encourage that the proposals I have asterisks against, above, be rejected.

Regards,

[REDACTED]
Canberra

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[REDACTED]

17 December 2007

The Minister
ACT Planning & Land Authority
16 Challis Street
DICKSON ACT 2601

Attention: **Doug Brooks**

Dear Sir

Braddon Planning Review

We refer to discussions earlier in the month and to previous advice provided by [REDACTED] in respect to the proposed changes within the Braddon commercial areas.

The draft Territory Plan review for Braddon proposes to change densities, height and land uses in the areas from Mort Street to Torrens Street, and is aimed at encouraging redevelopment to create a mixed use more vibrant commercial precinct with upper level residential.

[REDACTED] supports the initiative and planning changes but do have a number of concerns that we believe need refinement to reflect market sentiment.

The area of concern is that the uses permitted above Level 1 "must" be residential.

Original discussions were that if residential was to be provided in any redevelopment it could only occur on the upper levels, but was not mandated as a use.

We believe that the upper floors should allow either office or residential to permit some flexibility and cater for changes in demand over the period in which it will take to see redevelopment occur in Braddon.

As set out later in our market commentary, supply being provided in the market is primarily in the City Centre and is targeted almost entirely at Commonwealth or ACT Government tenants.

The higher land cost, smaller sites and lower car park ratios, makes most of the supply to expensive and not attractive to smaller private sector and corporate tenants.

Braddon is an ideal location on the fringe of the CBD to create an opportunity and an incubator for the smaller private sector users who seek access to office space in non high rise buildings with more generous parking.

Areas such as the Airport and Kingston Foreshore have attracted many such users due to the availability of supply, Braddon is better located for this type of supply and can feed off the increasing demand in the CBD and Commonwealth Government expansion.

We have attached the following market commentary document to show the level of supply that is being produced for primarily Government occupation.

[REDACTED]



1.1 CANBERRA OFFICE MARKET OVERVIEW

The Canberra Office sector has experienced dynamic market conditions over recent years. Underlying the market has been the forces of strengthening demand and increasing supply; which has led to high levels of investor confidence. The size and quality of Canberra's office market is being enhanced by the new supply that is in response to demand driven by an expanding Commonwealth Government.

Market growth is evident by a net absorption of over 80,000 square metres for the first six months of 2007. The tables below show data that has been collated from the Property Council of Australia (PCA) Office market report for July 2007.

Canberra's office market expanded by 23,235 square metres or 4.5% over the six month period and is particularly robust when compared to the 0.8% experienced for the whole Australian office market. The expansion of the Canberra CBD (Civic or City) as shown in Table 2 has been more modest 11,896 square metres or 2.9% over the same 6 month period.

Canberra Region	Jan 05	Jul 05	Jan 06	Jul 06	Jan 07	Jul 07
Total Stock	1,572,799	1,573,759	1,590,007	1,604,371	1,652,383	1,726,425
Total occupied stock	1,510,413	1,528,010	1,556,183	1,570,718	1,622,333	1,703,190
Total Vacant Stock	62,386	45,749	33,824	33,653	30,050	23,235
Total Vacancy level	3.97%	2.91%	2.13%	2.10%	1.82%	1.35%
Supply additions	28,585	6,478	24,267	14,374	59,061	97,268
Withdrawals	3,024	5,518	8,019	10	11,049	23,226
Net Absorption	41,687	17,597	28,173	14,535	51,615	80,857

Table 1 Source: PCA Office Market Report July 2007

The decline in vacancy levels is a clear indication of strengthening demand over recent years. The average Canberra Office vacancy level since 1990 is 4.8% compared to the current level of 1.35%. The Canberra CBD is also low although trending upward over the last 12 months.

Canberra CBD (Civic)	Jan 05	Jul 05	Jan 06	Jul 06	Jan 07	Jul 07
Total Stock	444,845	443,855	443,863	443,863	461,187	474,751
Total occupied stock	436,410	434,154	432,477	437,168	452,584	462,855
Total Vacant Stock	8,435	9,701	11,386	6,695	8,603	11,896
Total Vacancy level	1.90%	2.19%	2.57%	1.51%	1.87%	2.51%
Supply additions	12,435	4	17	0	24,000	22,786
Withdrawals	1,353	994	9	0	6,676	9,222
Net Absorption	15,474	(2,256)	(1,677)	4,691	15,416	10,271

Table 2 Source: PCA Office Market Report July 2007

The new supply is expected to have a diminishing effect on demand over the next four years and move the vacancy level closer to the long term average. This trend has already commenced in the Canberra CBD with some older stock as tenants move into new accommodation.



MARKET PROFILE

The quality of office stock in the Canberra market is relatively poor with only one quarter considered to be of 'A' grade standard and no premium grade accommodation. CICV has analysed the expected market growth over the mid term horizon that shows the proportion of A grade stock will be around 42% by Late 2012.

Canberra Region	Total Stock	Total Vacancy	Vacancy Level	Market Share
Grade A	449,737	-	0.00%	26%
Grade B	463,788	3,418	0.74%	27%
Grade C	737,282	17,726	2.40%	43%
Grade D	75,618	2,091	2.77%	4%
Total	1,726,425	23,235	1.35%	100%

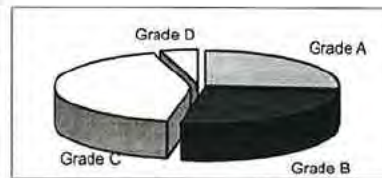


Table 3 Source: PCA Office Market Report July 2007

The Canberra CBD will experience the most dramatic improvement in office quality. The current proportion of 'A' grade stock is only 15% and we estimate this level to rise to approximately 32% by January 2013.

Canberra CBD (Civic)	Total Stock	Total Vacancy	Vacancy Level	Market Share
Grade A	72,491	-	0.00%	15%
Grade B	180,306	2,183	1.21%	38%
Grade C	198,763	8,424	4.24%	42%
Grade D	23,191	1,289	5.56%	5%
Total	474,751	11,896	2.51%	100%

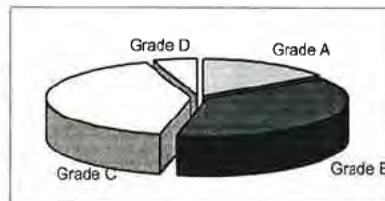


Table 4 Source: PCA Office Market Report July 2007

Vacancy levels are at record lows and are expected to remain low for 'A' grade stock over the mid term. The main concern for investors is secondary accommodation with short term lease expiry profiles. This type of accommodation (mostly lower B grade and C grade) will have the greatest risk of a vacancy level in excess of 10% within the next two to five years.

The last time the Canberra market experienced a significant increase in vacancy levels was in the mid to late 1990's. This caused some owners to change the use of their accommodation from office to residential.

Today's market conditions are, however, quite different to the mid to late 1990's. The current market is being driven by strong positive demand for greater volume as well as quality of accommodation. The 1990's experienced diminished demand as a result of government policies to down size and even abolish some agencies.

DEMAND

The strong demand driving the Canberra office market is a result of several factors as follows:

- The opportunity to move is now available to a large number of Commonwealth Government departments who entered into long term (10 to 15 year) lease in the 1990's.
- The growth of both the economy and the government sector has created the need for many departments and agencies to expand their operations. The need for more accommodation has therefore become stronger.
- Government affordability has been boosted by budget surpluses at a Commonwealth level.
- Tenant requirements for contemporary building and accommodation standards have also promoted the need for new development. Changes to building design to promote environmental sustainability has been evident in Sydney and Melbourne where building construction has been more concentrated over the last decade. The limited amount of new construction in Canberra between the mid 1990's and 2006 provided little opportunity to fully benefit from these advances in building technology.
- Environmental sustainability has been embraced by the new wave of office supply. Contemporary measures such as the Australian Green Building Rating (AGBR) System and Green Star Rating System are now important features and requirements of new accommodation.
- Planning authorities have responded to the growth of the market and the need to allow room for expansion. The implementation of the Griffin legacy, ANU exchange and the controlled release of commercial land have provided developers greater guidance as well as opportunity to produce new supply.

Braddon Planning Review
December 2007

SUPPLY

Market supply is constantly monitored by [REDACTED]. Our register of supply has been updated to show the new supply that has been delivered in the last 12 months and future supply that has been pre-committed. Table 3 below shows that recently delivered supply accounts for just under 80,000 square metres since the last quarter in 2006. Although this is a high volume when measured against the historical average, the vast majority of supply is yet to be delivered.

Location	Recently Delivered Supply		Area NLA (sqm)
	Tenant	Pre-Commitment	
National Circuit, Barton	PM & C	2007Q1	15,000
DITR Building, City	DITR	2006Q4	23,500
"Glasshouse", Phillip	CASA	2006Q4	8,000
"Glasshouse", Phillip	APSC & CSA	2006Q4	6,600
AusAid Building, City	AusAid	2007Q2	9,000
New Acton, City	ACCC	2007Q2	6,500
Centro Plaza, Phillip	FAC's	2007Q2	10,000
Total			78,000

Table 3 :Recently Delivered Supply Source CICV Canberra

[REDACTED] register of Committed Future Supply has been summarised in Table 4. The delivery timeframes and quantum of space have been sourced from owners, developers and tenants; but may be subject to variation. Table 4 shows 484,000 square metres of committed new accommodation will be supplied between late 2007 and January 2013.

Braddon Planning Review
 December 2007

Location	Tenant	Comment	Delivery	Area NLA (sqm)
Airport	DEWR	Substantially completed	2007Q3	10,000
Airport	Defence	Substantially completed	2007Q4	12,000
Airport	Defence	Substantially completed	2007Q4	4,500
Airport	Defence	Substantially completed	2007Q4	4,500
Airport	Defence	Substantially completed	2007Q4	4,500
Airport	Ratheon	Substantially completed	2007Q4	4,500
Airport	For Lease	Substantially completed	2008Q1	13,000
Barton	Spec – For lease	Not yet commenced	2008Q4	6,000
Barton	Attorney Generals	Old bldg demolished.	2009Q1	18,000
Barton	Environment & Spec	Not yet commenced	2012Q4	60,000
Belconnen	DIMA	Substantially completed	2008Q1	17,500
Braddon	ACC	Substantially completed	2007Q3	3,000
Braddon	Spec – For lease	Recently commenced	2008Q4	8,000
City	Environment	Substantially completed	2007Q3	8,000
City	Taxation	Substantially completed	2007Q3	40,000
City	DAFF	Substantially completed	2007Q4	27,000
City	NICTA/DAFF	Substantially completed	2007Q4	18,000
City	Taxation	Substantially completed	2008Q1	20,000
City	Spec	Construction has commenced	2008Q4	3,500
City	DEST	Not yet commenced	2009Q4	38,500
Fyshwick	Spec – For lease	Not yet commenced	2008Q4	2,500
Kingston	Owner occupiers	Not yet commenced	2008Q4	12,000
Kingston	Spec – For lease	Not yet commenced	2008Q4	2,000
Parkes	Australian Federal Police	Substantially completed	2007Q3	20,000
Parkes	ASIO/ONA	Not yet commenced	2010Q3	40,000
Phillip	Spec – For lease	Not yet commenced	2008Q4	3,000
Tuggeranong	Centrelink	Substantially completed	2007Q3	40,000
Phillip	DOHA (Health)	Not yet commenced	2010Q1	44,000
Total committed supply				484,000

Table 4: CICV Canberra

The information provided above is based on our knowledge of the timing and volume of future market supply as at August 2007. The reader should be aware that the information may vary due to changes in tenant demand, development processes / timing and general economic circumstances.

Braddon Planning Review
December 2007

POTENTIAL SUPPLY

are aware of several developments that have a strong likelihood of being delivered over the next five years, although no deals may have been executed as yet.

Location	Tenant	Delivery	Area NLA (sqm)
City	Speculative	2009Q2	9,000
Dickson	Speculative	2009Q4	16,000
Parkes	AFP or Other CoA	2010Q1	15,000
Phillip	For Lease	2010Q2	20,000
Tuggeranong	Likely to be CoA	2010Q2	19,000
City - Section 63	Not yet commenced	2011Q2	70,000
Belconnen	Speculative	2012Q1	18,000
Russell	Defence	2012Q2	80,000
Total Potential Supply			247,000

Table 6: CICV Canberra

The above information is highly subject to change. are aware that much of the supply shown in Table 6 may be considered as "Committed" supply in the near future. will therefore continue to monitor the above details and the impact any change will have on market behaviour.

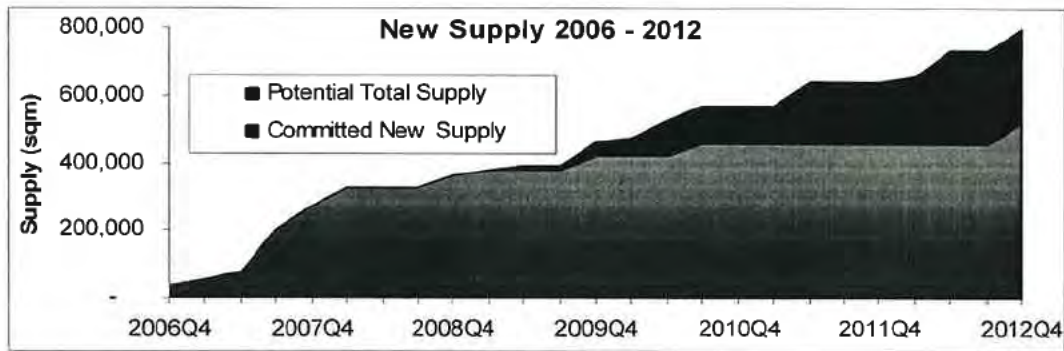
SUPPLY SUMMARY

The total supply from late 2006 to late 2012 has been summarised below.

Supply Type	Net Lettable Area	
Recently Delivered supply	78,000	square metres
Committed Supply	484,000	square metres
Potential (uncommitted) supply	247,000	square metres
Maximum supply	809,000	square metres

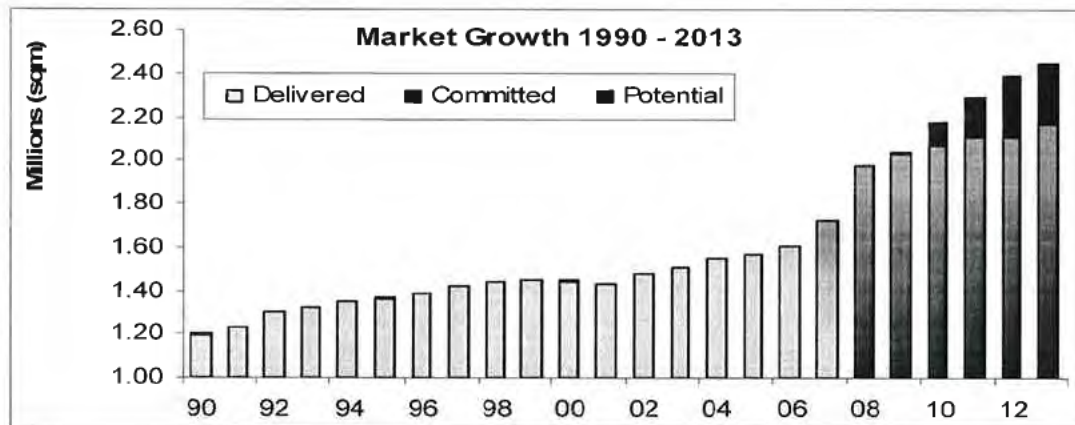
The total market growth for the period 2006 to 2012 will be at least 562,000 square metres with current potential to be 809,000 square metres. The market growth could therefore represent a 50% increase in the total market from 2006 to 2012.

MARKET DIRECTION



Graph 1: CICV Canberra

Only a small portion of the new supply has been delivered. Graph 1 illustrates a wave of new supply that will be delivered to the market over the next four years. The most significant increase in supply will be delivered in the next two years. We consider the vast majority of potential supply shown above will also be delivered to the market.



Graph 2: CICV Canberra

Market growth over the next two to four years will be the most significant since self government was established in the ACT. The office market size by Late 2012 is expected to be nearly double the size it was in 1990.

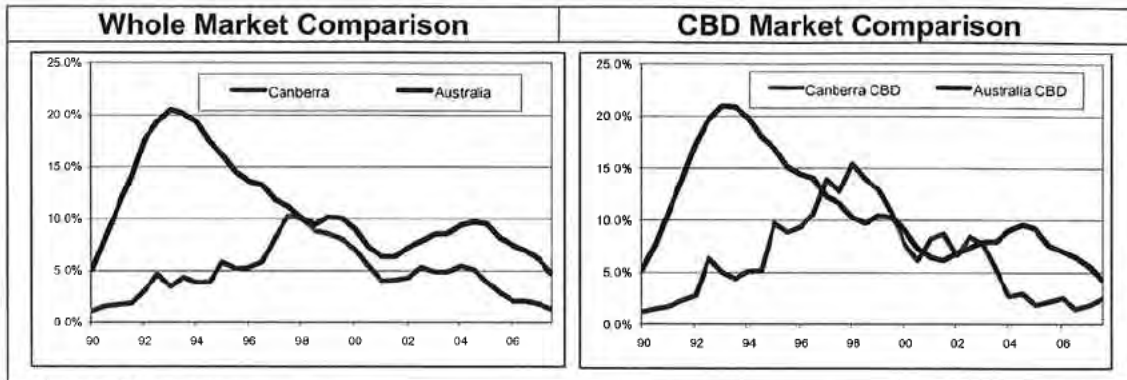
VACANCY LEVELS - COMPARISON TO NATIONAL MARKET

Table 7: CICV Canberra

Office vacancy levels in Canberra have traditionally been low when compared to the total national market and also tended to be less volatile. The Graph above (left side) shows a sharp rise in vacancy levels that occurred in the mid 1990's. The rise was in response to the downsizing of the Commonwealth Government sector that led to diminished demand for commercial office accommodation.

The Canberra market has experienced steady demand and little market growth up until late 2006. The result has been a gradual fall in vacancy levels and a widening of the gap between Canberra and the national average. This trend will change from late 2007 as more supply is absorbed by the market and older style accommodation is vacated and made available for lease.

The CBD (Civic or City) is Canberra's largest office market and has been compared to the average of all Australian CBD markets in the graph above (right side). The CBD has started to experience an increase in new supply and a higher vacancy level as tenants move into the new supply.

We do not envisage a significant increase in 'A' grade vacancy levels as the vast majority of new supply is pre committed. Secondary accommodation with non CBD locations will, however, experience a more dramatic increase in vacancy levels and more competitive leasing activity.

CONCLUSION AND KEY POINTS

- An expanding Commonwealth Government has underpinned strong demand.
- A substantial increase in supply is being delivered in response to the strong demand.
- Vacancy levels are at record lows and well below the national average.
- The Canberra CBD has experienced a slight increase in vacancy level but is still low and below the national average for CBD markets.
- The current development phase (2006 to 2012) will deliver 520,000 to 727,000 square metres, which could increase the market size by 50%.

Summary

The key factors to ensuring planning changes in Braddon are flexible and deliver outcomes that are desirable are as follows:

- Demand

There is no question that there will always be good demand from smaller private sector/corporate users for office space with more generous parking provisions than in the CBD.

As the Commonwealth Government continues to expand and consume all the space available, it will become more critical over the next 2 – 3 years that space is identified for smaller users.

- Supply

By 2009/2010 there will be a series of B, C & D grade buildings that will be vacant post Commonwealth tenant occupancy their new 4.5 star purpose designed buildings.

A number of things will happen to these buildings:

- Refurbish to 4 star and release to Government tenants on shorter terms and drawing users back from Airport
- Some redevelopment for alternate uses such as residential or hotel
- Some fully redeveloped and new buildings constructed

However, not many of the buildings will be suitable for private sector office space due to:

- Poor flexibility of floor plates
- Size of floor plates
- Insufficient vertical transportation infrastructure not suited for multiple tenant occupation
- Poor or no parking

There is currently not a lot of supply being created for smaller users with recent land sales at Kingston being purchased by some owner occupiers and developers that now have commitments.

Braddon will be a very suitable location for these users.

- Mixed Use

The intent of Braddon is to create a precinct with active ground floor industry users and restaurants that feed off the workers and residents of the suburb.

Our concern of mandatory residential above Level 1 is that a significant component of the development will be occupied by residential units that will not generate the daily demand needed in Braddon.



Braddon Planning Review
December 2007

Upper level office uses will create more dynamic day time activity in Braddon that will see business flourish.

A mix of residential and commercial can work but we believe flexibility needs to be available and not a mandated use for residential above Level 1.

- Affordability

The provision of mandatory residential units in a mixed use building will result in the requirement for an additional lift foyer and stairs, which will mean increased construction costs over that of pure residential projects in the nearby residential areas.

The cost of these additional services, plus potential buyer resistance from a mixed use building, will mean that residential will be less attractive and less profitable in the short to medium term.

We hope that this advice is of assistance in your considerations.

Please do not hesitate to contact the writer if you require to discuss any aspects of this submission.

Yours sincerely,





ACT Planning and Land Authority

18 Challis Street

DICKSON ACT 2602

Attention: Doug Brooks

Dear Doug,

Braddon Commercial Precinct. Urban Design Study

We are the owners of [REDACTED] For some years we have been holding discussions with the various planning personnel with a view of redeveloping this very important and strategically located site. Despite the obvious changes to the social changes to the social and commercial needs for this area there still seems to be some emotional attachments to this particular area despite the obvious changes taking place in this important area.

There is a distinct move by the [REDACTED] to relocate their core business to regional areas for their service and in some cases retailing [REDACTED]

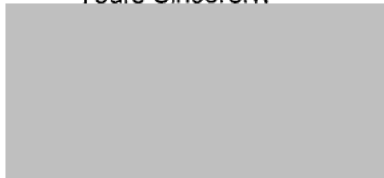
We in fact have our tenant on a short term lease as they are developing a site elsewhere. We are in discussions with them to maintain some retail and display options in any future development that may take place.

Whilst the newly released planning study addresses a lot of the issues for Braddon it still falls well short on flexibility relative to the limits on heights and uses within the building envelope. Whilst it would be nice and cosy to maintain certain emotional memories of “the good old days” for Braddon, reality is that planning guidelines should always be addressed to meet the social and commercial needs of the community. In case of Braddon there is clearly demonstrated need for office accommodation for organizations and professional service providers consulting to the government and the ACT community rather than being located within the city precinct

The reason for this is the high cost of city office accommodation and the inconvenience of making brief visits to these providers.

The need for residential accommodation is yet to be demonstrated but flexibility to include an element should be left to the market to decide.

Yours Sincerely,



CC: Andrew Barr ACT Planning Minister



11th December 2007

Urban Design,
ACT Planning and Land Authority
GPO Box 1908
CANBERRA ACT 2602

BRADDON REDEVELOPMENT

We are excited that at long last attention has been given to Braddon commercial area. We believe the proposed plan should be much more extensive with more emphasis on residential development. Our commercial office building in Torrens Street was vacant for 7 months from September 06 to April 07. We lost several prospective tenants to the Canberra Airport.

Your idea to allow redevelopment in Braddon bounded by Torrens, Mort, Girrahween and Cooyong Streets is necessary to help Civic become a vibrant and more people friendly place. Civic needs people to be successful. The proposed plan as it stands limits property owners in Torrens Street to take part in a change that would help to achieve what your Government proposes.

In Torrens Street the proposed plan will allow only very limited 3 storey development. The total area of a building allowed would be no greater than 80% of the land area. (Example) If the land is 1200 sq meters the building allowed can be no more than 960 sq meters. This means the proposed buildings if built over 3 storeys would occupy only 320 sq meters (31%) of the land. The buildings are now approx. 600 sq meters. The plan as proposed will allow an increase of only 350 sq meters. To achieve this and comply with the car spaces needed it would be necessary to demolish the present buildings and build underground parking. The proposed lease conditions are very restrictive and limited with little opportunity for residential development.

The present buildings in Torrens Street do not meet the requirements of the modern day planning of Canberra. They are neither a house nor a commercial venture. They do not comply with standards for Government use. They are open to vandals and drug users to

wander on to the properties. The open area at the front consumes lots of water to maintain.

The southern end of Torrens Street faces open parkland and adjoins commercial properties at side and rear. There is a wider than average nature strip. Therefore set-backs would not be necessary. There could be no objection to reasonable development. They are within a few minutes walk to Canberra Centre. They are perfect for residential and commercial development. There is little traffic noise and they are far better suited to development than those already developed in Northbourne Avenue where there are parking and traffic noise problems and they are NOT within reasonable walking distance to the Canberra Centre. Braddon is now claimed to be part of Civic and is levied by the CBDL as such. People living or working in South Torrens Street would not need to use a car to travel to Civic.

In Braddon there are old unapproved corrugated tin sheds that have been there for more than 60 years. This area needs a breath of fresh air. Please let us contribute to our city and let us build something that could contribute to Canberra.

Yours sincerely



16 December 2007

Urban Design
ACTPLA
GPO Box 1908
16 Challis St
Dickson ACT 2602



Dear Sir/Madam,

I wish to comment on the **Braddon Commercial Area Planning Study**.

Whilst Mort and Lonsdale Streets are in need of an upgrade, it is extremely short sighted to redevelop Northbourne Oval. In addition six storey towers on the corners on Girrahween, Elouera and Cooyong Streets have the potential to change the unique character of this precinct and it is questionable whether the redevelopment of the western side of Torrens St is warranted at this point in time given that it is a recent example of attractive and sympathetic urban renewal. The increased density proposed by the study will also have a detrimental impact on traffic, parking and infrastructure.

Northbourne Oval

Blocks 5 and 6 Section 30 are heritage listed. The oval is in a heritage precinct, surrounded by the oak trees on Torrens St, the Salvation Army Hall and Ainslie Primary School. It is part of Canberra's early history and part of the Walter Burley Griffin Legacy, with a corresponding oval in Turner and providing vistas to Mount Ainslie and Mount Majura. It was never intended to be part of a harsh urban, concrete environment but instead to reinforce the principle of the 'Garden City' and provide for the needs of its citizens for green space, sport and recreation.

There has been an ever increasing number of residents, shop and office workers in the city and Braddon in particular with no corresponding increase in green space. The study under discussion proposes further increases in population with absolutely no consideration for the recreational needs of the prospective residents and future generations. Braddon has the highest population density of any suburb in Canberra yet it has only one public park, a small park near Lowanna St in north Braddon and Haig Park.

If the lessees of Block 5 Section 30, (a concessional lease), no longer want the lease it should revert back to the Canberra community. Revenue from the Change of Use charge resulting from the sale of the Community's assets should revert back to the community by providing more community assets such as a public park. Northbourne Oval belongs to the community of Canberra and as such the oval and its surrounds should return to the present and future citizens of Canberra.

I have included some photographs of the surrounding area of Ainslie Oval, which is a publicly owned, enclosed oval like Northbourne Oval but where the surrounds are beautifully landscaped, the caretaker's cottage has been retained, there is a children's playground, an exercise circuit and walking track for pedestrians and their pets.



Children's playground and seating adjacent to Ainslie Oval



Exercise circuit adjacent to Ainslie Oval



Landscape, seating and hedge surrounding caretaker's cottage, Ainslie Oval

A similar treatment of Block 5 Section 30, with the retention of the caretaker's cottage for community use would:

- compensate the community for the loss of amenity suffered by increased redevelopment in the inner suburbs
- provide public recreational land for existing and future residents and office workers
- maintain Burley Griffin's vision for Canberra
- provide a green belt, demarcation and relief from the high rise, concrete environment of the CBD
- provide a buffer for the absorption of excess water and carbon emissions.

NB. as a community representative during the Neighbourhood Planning process, at no time was the redevelopment of Northbourne Oval ever canvassed.

Mort and Lonsdale Streets

These streets have a unique character. The commercial holdings are small, limited in height and the businesses are varied in character. Despite being in a commercial precinct, there is a vista north to Haig Park and these trees together with those of Northbourne Oval are ever present. 6 storey tower blocks would destroy this unique character. NB. height should be specified in metres to parapet rather than storeys as the two can vary significantly.

This commercial precinct is also of a historic importance to the development of Canberra yet the proposal for a 6 storey tower on Elouera St is on the site of the historic Coggan's Bakery. It is important that Canberra's early history be retained and remembered and not be overshadowed by high rise towers.

An important addition to the precinct might be anodised, all weather photographs of the buildings that used to stand on the various sites eg the steam laundry, the garages, the ice and cordial factory so that residents and visitors can go on walking tours of the precinct.

Torrens St

The redevelopment of Torrens St in the 1980's is extremely attractive. The red brick and tiled commercial premises are enhanced by the oak trees of Torrens St. It is an example of sympathetic integration of commercial premises with residential and should be retained.

Traffic and Infrastructure

In the ARUP Traffic Study for B1 development areas North Canberra (August 1995) the Torrens/Cooyong/Ballumbir intersection was singled out as of particular concern both in the short term and the long term.

The Torrens Street/Cooyong Street/Ballumbir Street intersection is located amongst many closely spaced intersections along this city outer distributor road (Cooyong Street) which are predominantly signalised. Furthermore site constraints and the current intersection layout do not favour major redesign. These factors limit the options which are available to manage any substantial increase in traffic at this intersection (p.12)

An up to date traffic study with short and long term projections, based on current and predicted traffic and parking generation needs to be conducted of the Braddon commercial area in relation to the CBD and the Canberra network before any redevelopment of the precinct is considered. The area is already congested with traffic and insufficient parking and the objective might be to improve what exists rather than create an extension of the CBD.

In addition a study needs to be conducted on the capacity of the existing infrastructure eg sewerage, stormwater etc. and the cost and implications of any upgrade.

Because of the number of contaminated sites an environmental impact study is also necessary before these sites are re-developed..



Fiona, Ruth

From: Hart, David on behalf of ACTPLA Feedback
Sent: Thursday, 20 December 2007 4:35 PM
To: Gell, Chris
Subject: FW: Braddon Commercial Area Planning Study - comments on [SEC=UNCLASSIFIED]

Chris

[Feedback on the Braddon Commercial Plan for your information](#)

David Hart

Customer Feedback Unit
ACT Planning and Land Authority
Phone 62072035
E-mail david.hart@act.gov.au

-----Original Message-----

From: [REDACTED]
Sent: Thursday, 20 December 2007 4:21 PM
To: ACTPLA Feedback
Subject: Braddon Commercial Area Planning Study - comments on [SEC=UNCLASSIFIED]

To: Urban Design, ACT Planning and Land Authority

Att: Chris

Re: **Comments on Braddon Commercial Area Planning Study**

Thank you for the opportunity to comment on the Study.

I am a long term owner/resident of Braddon (over 10 years) and live [REDACTED] - in the area covered by the Study. I utilise many of the businesses in Braddon, particularly the cafe/restaurant areas on Lonsdale Street, and have developed a strong social network involving these places.

Having read the study, I have also discussed the recommendations with a number of other users of the Braddon area within my diverse network, including cafe owners and potential owners, journalists, planners, business people, other residents, etc. The common view appears to be that Braddon could use some development, however, it must be implemented very carefully so as not to destroy the vibrant and diverse character of the area.

Further, redevelopment needs to be managed at a pace which allows develop to occur properly, not one determined by developers that may be interested primarily in commercial gain, more than other important, but less tangible, community and social values of Braddon - many of which the Study has picked up on, which I commend.

In short I have two areas of comment: (1) the increase in storey limit and (2) how the success of any redevelopment will measured over time.

1. Increase of storey limit to >4 stories.

I do not believe that the height limit can be increased from 2 to 4 stories across the majority of the Study area without significant negative impact on sunlight and sense of space, including the associated values of well-being, ambience and warmth.

Further, the proposed setback for >2 stories is minimal and the overall effect will close in the streets of Braddon. I am very concerned that what is currently a green, leafy and sunny place of vibrancies and gentle urban form will become transformed into a set of urban canyons, cold, shaded and without character.

I suggest that this recommendation to should be varied to a maximum of 3 stories.

In areas where a 6 story limit is proposed, this should be reviewed carefully in the context of my comments above with a view to reduction down to 4-5 stories.

2. Measuring the success of redevelopment

I would like to know what your criteria of success is for the aims and objectives of redevelopment of Braddon.

The Study picks up on and uses descriptors such as or pertaining to street buzz, vibrancy, sense of place. This is excellent and acknowledges the critical importance of Braddon to the social well-being and community of people in the area and indeed of wider Canberra.

How do you intend to measure how these values are being maintained or increased by the results of the Study and recommendations contained within it?

Thanks again for this opportunity. I will keep my comments brief as I appreciate you need to keep the process moving at this late stage of the working year. I would be more than happy to discuss my comments further.

Regards

[Redacted signature]

[Redacted contact information]

P.S. What is your intent for the Telstra site. That must an area crying out for redevelopment.

If you have received this transmission in error please notify us immediately by return e-mail and delete all copies. If this e-mail or any attachments have been sent to you in error, that error does not constitute waiver of any confidentiality, privilege or copyright in respect of information in the e-mail or attachments.

Mr Barr



Mr Andrew Barr, MLA
Minister for Planning,
GPO Box 1020
Canberra ACT 2601

24 Dec. 2007

Dear Mr Barr, Ref.Braddon Commercial Area Planning Study

We thank you for forwarding to us the above Draft Report, in reply to our letter to you of 16/11/2007.

It makes for very interesting reading.

However, we note that it is a DRAFT REPORT, so we are hopeful you will allow us as citizens- whose residence is in [redacted] - to say a few more words.

Acknowledgement required

We note that it is proposed (P.19 Precinct b4) to increase the height of buildings on the west side of Torrens St, to the same height as the buildings on the East side of the street.

Torrens St. is relatively narrow with no divider, like Lonsdale, so unless it is proposed to remove the trees on Torrens Street (see P.12 nominated heritage item) you will create a canyon-like effect, completely spoiling the present distinctive leafy character of the street (see P.9.5th paragraph). You will also block the present pleasant views from the upper stories on the east side of Torrens and reduce sunlight to all the east side. This situation is further exacerbated by your planned height increases on Lonsdale and Mort. Property value on the east side will consequently also be reduced.

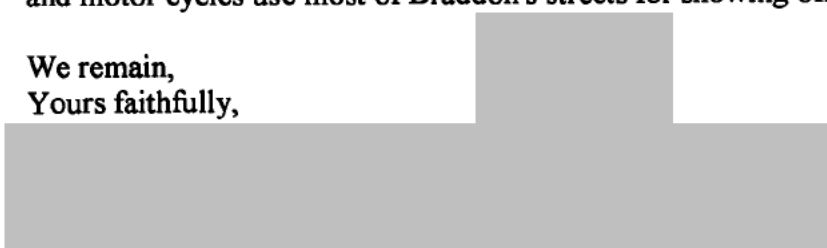
We are therefore understandably opposed to the Plan in its present form and will forward a copy of this letter to the Committee of the Body Corporate of [redacted] for circulation to all [redacted] owners as well as endeavouring to collect further support from all property owners on the east side of Torrens Street.

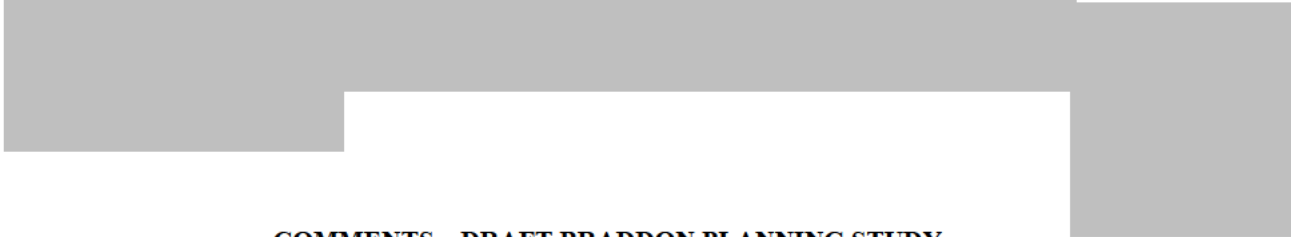
Torrens St. is at present heavily used by traffic as it is the only north-south thoroughway, without lights between Northbourne and Limestone leading directly into Civic.

We are glad to note the proposed improvements to pavement surfaces and the addition of such features as public seating, bicycle racks and awnings. However, the intention that building materials used in this area, should be such as to differentiate between it and Civic buildings, seems to specifically exclude the west side of Torrens St (P. 26).

As you must be aware, the edges of Haig Park, suffer from a certain level of drunken behaviour & consequent rubbish & vandalism particularly on Friday and Saturday nights. Souped-up cars and motor cycles use most of Braddon's streets for showing off speed and noise on those nights.

We remain,
Yours faithfully,





COMMENTS – DRAFT BRADDON PLANNING STUDY



As has been correctly identified within the draft report, Braddon commercial area was established to provide light industry support for the civic centre. What has not been mentioned, is that some of the trade business identified within the report commenced initial operation when Braddon was first established and have assisted the Civic community ever since.

Whilst [redacted] is not about stifling change, current proponents of the draft report have to acknowledge that the every changing Civic centre and expected office developments over the coming years, the continued support of [redacted] within the Braddon area will be paramount.

Of specific concern to [redacted] with the proposed planning study are:

1. Rental values

One of the objectives under the proposed new Territory Plan is “To provide for a range of conveniently located and relatively low-rent service trades and commercial uses close to residential areas”

As with most business rental cost along with wages continues to be one of the major cost impediments to remaining viable. [redacted] recoupment of all expenses comes through the sale of their labour at an hourly rate. Whilst each business determine what hourly rate they will charge the consumer, it will become quickly evident if the rate is outside what the consumer considers reasonable for the services provided. In fact if you were to complete a survey across the ACT you will find that there is not a large variation within the labour rate charged to the consumer.



█ would absolutely agree with the statement under **Future Role of the Braddon commercial area**, “Alternatively, an increase in the building height and plot ratio may promote redevelopment and residential use, although there is some risk that this will increase land values significantly, resulting in the displacement of the traditional service trades.” The government must not underestimate the importance of this identified problem in changing the current commercial aspects of Braddon to that of residential and commercial.

Speculation by current owners of property within the Braddon area as to the likely implementation of such a proposal has led to rental increases well above CPI increases for some time now. █ is concerned that rental values will now raise dramatically to the extent that any trade service providers will not be able to afford to remain within the area. █ notes that no protection against such action by current and future landlords is being contemplated by the government.

2. **Height restriction on ground floor**

One of the key recommendations states that the ‘ground floors to have a 3.9m floor-to-ceiling height to permit a wider range of uses’. This height level does not allow for most of the current trade services activities within the area. A height limit of 6.0m is required to allow the installation and safe operation of vehicle hoists.

Whilst some hoists can operate at the level indicated, they don’t allow for a vehicle to be lifted above the technicians head to properly investigate a customer request for repair. Failure to provide adequate height will raise serious OH&S issues.

█ would argue therefore that all ground floors to have a 6.0m floor-to-ceiling height to ensure the trades can effectively remain within the Braddon area.

3. **Parking**

Parking problems already exist within the Braddon area. The removal of verge parking to accommodate the construction of ground floor premises commencing on the front boundary will only exacerbate the current position.

Whilst this may provide an attractive streetscape, it will discourage consumers from utilising the trade services being offered. Customers must have the ability to park vehicles for repair at the business location. This allows the business operator the ability to discuss with the customer the repairs required and to inspect the vehicle with the customer to identify any additional work that may be required to be completed, especially if the additional work relates to a safety issue.

█ would argue that the re-development of a block must provide vehicle accommodation equal to the number of proposed residents plus allocate at least 10 parking spaces specific for customers parking.

4. **Odours/Noise**

The current Territory plan clearly identifies residential areas as distinct from commercial areas to ensure that residents are protected from the normal by-product of trade business which includes noise and odours.

Most trade services commence at 7am and finish around 6pm. The introduction of residential accommodation on floors above a business will have the potential to create conflict between the residents and the business operator. It has to be understood from the outset that no restrictions can be placed on a businesses ability to generate revenue to accommodate the lifestyle of the residents.



█ is of the opinion that the mix of residential and trade services without specific designated areas will lead to continued conflict and reduce the likely hood of re-development. Prospective residents must be fully informed on the terms and conditions that the trade services are able to operate as part of the sales process.

5. Truck deliveries

The delivery of goods within the trade services area range from a small pan-tech to semi trailer in size. These vehicles require additional turning space and height to operate effectively and in a safe manner both to the truck operator and the general public.

As the proposal fails to identify this as a concern, and thus offer a solution for consideration, █ is concerned that the manageability of these vehicles in a safe manner cannot occur without a major disruption to the normal traffic flow at any given time. Further the delivery of goods outside normal business hours will also generate noise levels that may not be acceptable to residents and business operators will be required to remain on site until the delivery has been completed. Further, other business operating within the area eg; restaurant operators would not consider it appropriate should a semi trailer commence a delivery during their peak consumer time.

6. Waste removal

As with any business, the generation of waste and how to effectively manage the collection and disposal that meets all environmental requirements is paramount. As with the delivery of goods mentioned above, the collection of waste although not completed in semi trailer size trucks, all utilise large trucks in various configurations.

█ again is concerned that this matter has not been identified and suitable options put forward for consideration.

7. Service Stations

Upon review of the Building heights under the proposal, █ is concerned that the 6 storey height limit applies to the sites currently being utilised by service station proprietors. Obviously, these sites are likely to be highly valued by developers due to the increased return on investment. However the removal of these sites would mean that consumers would not be able to purchase fuel within Canberra City area.

█ would also highlight the known contaminated groundwater plumes that exists in the area, and believes that the Environmental Protection Authority should provide a full report on the likely impacts on the whole Braddon/Civic area in completing rectification work before any further consideration into this proposal.

In conclusion, the █ has serious concerns that the viability of trade services within the Braddon area can be maintained under the current proposal and that the community and distinct characteristic of the Braddon area will be lost.

The █ would value any further discussion that might arise from this proposal and looks forward to meaningful consultation on this matter.

█

█



ACT Planning and Land Authority

18 Challis Street

DICKSON ACT 2602

Attention: Doug Brooks

Dear Doug,

Braddon Commercial Precinct. Urban Design Study

Thank you for the pre-release briefing on 27th August on your current planning and design studies of the Braddon precinct. We look forward to the release of your draft report, and to continuing stakeholders' involvement in the process leading to the adoption of the final planning policy for the precinct.

As you are aware, we are the owners of the [redacted] which comprises [redacted] blocks with a total area of some [redacted]. We have been involved in discussion with ACTPLA for more than four years about various redevelopment proposals, but have generally been disappointed at the Authority's inability to date, to establish a long term vision and redevelopment strategy for this important precinct.

The current Territory Plan controls can be traced back to the 1950's and 60's, and no longer provide the necessary incentive for owners to invest in innovative and appropriate redevelopment projects. We were also disappointed that the new Draft Territory Plan entrenched this outdated status quo.

We were therefore pleased to note, therefore that your current study is moving to establish controls which recognise the value and importance of the precinct, particularly given its location immediate adjacent to the CBD and Northbourne Avenue corridor.

We generally thought your new proposed planning framework is an excellent response to the needs of the area, although in our view, some flexibility achieved through performance measures will improve your overall proposal. Whilst we agree that a building height of 4 stories, and a plot ratio of 3.0 are an appropriate general base control, performance measures allowing up to 6 stories, with a commensurate plot ratio, could be considered. Such measures could refer to the need for articulated facades, active fine grain, street frontages, recessed upper stories, sustainable building design, land use mix, streetscape improvement contributions, avoiding overshadowing of public spaces at key times, e.g. mid-day, mid-winter, on site car parking and block size etc. Effective performance measures will also avoid the need to be prescriptive about tenancy sizes.

At the briefing, you also mentioned that "The Forum" in Sydney was a good model of the type of development envisaged for the Braddon precinct; We assume that you were referring to its bulk, scale, architecture, and activity mix, rather than its internalised focus. Our town planning consultant, [REDACTED] took the opportunity to visit the complex on a recent visit to Sydney, and we have attached some of the photographs taken by [REDACTED] I can assure you that we would be very happy to emulate this type of urban design response.

We trust that you will take the opportunity to consider the points made in this letter before finalising your draft report, but we look forward to making further comment during the consultation period.

Yours Sincerely,

A large grey rectangular redaction box covering the signature and name of the sender.

CC: Andrew Barr ACT Planning Minister

A large grey rectangular redaction box covering contact information, likely an email address.











19 September 2007

ACT Planning and Land Authority
18 Challis Street
DICKSON ACT 2602

Attention: Doug Brookes

Dear Doug,

Braddon Commercial Precinct - Car Parking

Further to my letter of 10 September 2007 I thought it also prudent to raise the importance of car parking management to the successful redevelopment and revitalisation of the precinct.

Given that the Authority envisages a vibrant, mixed use character for the precinct, with active street level activity, it is essential that adequate parking policies are adopted to support this aim. Given the pressure that exists on long stay parking in Civic, it is particularly important that parking policies prevent the workforce using Braddon as an overflow carpark.

Our suggestion is that car parking related to office and residential uses be required to be accommodated on each development and redevelopment site, in accordance with the provision rates specifies in the ACT Parking Guidelines. However, it is generally not practical for short stay visitors to a precinct to use private basements, which are normally subject to security entry and exit arrangements.

It is our view therefore that the short stay parking needs generated by active uses such as shops, cafes and restaurants be part of a public, accessible, parking supply, managed by government. This could partly be achieved by increased parking supply in Lonsdale Street, using the same right angle configuration that exists in Bougainville Street, Manuka. This could be supplemented by sensitive low rise, single aisle parking structure(s) in Haig Park, immediately abutting the Girrahween Street boundary to minimise the loss of parkland.. We also believe there is potential for a parking structure being incorporated into the future development of Northbourne Oval.

One way of implementing such an arrangement would be to establish a Parking Plan for the Braddon Commercial Precinct as part of the ACT Parking Contributions Scheme. Developments could then be subject to a parking levy in lieu of the provision of on-site short stay parking.

Again, we trust you will consider the points made in the letter prior to finalising your draft planning report.

Yours Sincerely,



CC: Andrew Barr ACT Planning Minister

