

[REDACTED]  
[REDACTED]  
[REDACTED]

30 March 2015

The Chief Planner  
ACT Land Development Agency  
470 Northbourne Avenue  
Dickson ACT 2602

Dear Sir,

**CANBERA BRICKWORKS + ENVIRONS  
COMMENT ON PLANNING & DEVELOPMENT STRATEGY February 2015**

**1. Introduction and Summary**

I am writing as a resident of Yarralumla seriously concerned about your current proposals, LDA2015, for expansion of this suburb. My career has been as a practising architect and I have post-graduate qualifications in town planning. I note that the Yarralumla Residents Association has prepared a comprehensive and highly critical submission with which I am in substantial agreement. Accordingly, I have chosen to confine this response to a summary of issues which cause me most concern, and rely on the details provided by the YRA to substantiate my comments.

Above all, I am concerned about the proposed scale and density of your design, and I have been alarmed to see the progressive increases at every iteration of the plan - **2010** - 900 to 1100 dwellings on 42 ha, **2013** - 1600 dwellings on 42ha, **2015** - 1885 dwellings on 49ha. I regard this action as a wilful assault on the existing suburb of Yarralumla and the high quality planning principles that have created the beautiful suburb that it is.

I believe that the amalgam of serious problems inherent in your 2015 plan are an inevitable result of the excessive number of dwellings you are attempting to accommodate on a site which has so many real constraints. If the quantum of dwellings is paramount, I suggest that an alternative site might present fewer constraints, prove less costly to develop and allow you to avoid the many compromises that plague your current scheme. For instance, I question whether the horse paddocks on the south side of Cotter Road might offer a suitable greenfield site which would be infinitely easier to access and which would relate well to the Curtin Shopping Centre, a facility with good parking and considerably more scope to enlarge than the Yarralumla shops. In any event, I believe an alternative site, or more than one site needs to be found to accommodate such a large number of new dwellings.

On the other hand, if the Yarralumla site must be used, I believe that can only be successful with the accommodation drastically reduced. At the same time, I consider the narrow strip of land across Adelaide Avenue fronting Denison Street quite alien in its detachment from the Yarralumla site and unsatisfactory for the development you propose. Your inclusion of housing on that site in your 2015 plan appears to be a desperate contrivance to increase the dwelling numbers without thought to its suitability.

## 2. Specific Concerns

In addition to excessive development, my principal concerns for the problems inherent in your 2015 plan are listed briefly below.

**2.1 Traffic** - There will be a considerable additional traffic load on the existing streets of Yarralumla and parts of Deakin and it appears that proper traffic movement surveys have not been carried out. In particular, concern must be held for Novar, Maxwell and Bentham Streets, none of which are designed for the likely loads.

**2.2 Park'n'ride Facility** - The proposal for major bus stops on both sides of Adelaide Avenue is unconvincing in its suggested design, indicating complex traffic movements on such a busy road - potentially very dangerous.

**2.3 Denison Street Development** - As stated above, this narrow strip of land will not relate to the Yarralumla residential site. Also, any development here will eliminate a car park which is currently fully utilised for the West Deakin office complex, immediately across the road, and remove the limited soft landscape band which completes the visual separation between Adelaide Avenue and the office complex.

**2.4 Shopping Facilities** - The proposed development will bring a huge additional load on to the Yarralumla shops, which are already under considerable strain. Although the plan provides scope for additional 'facilities and mixed use' at the south entry to the Brickworks site, the planning does not suggest that a meaningful community shopping centre is likely to eventuate.

**2.4 Parking associated with Shopping Facilities** - Parking provision at Yarralumla shops is currently inadequate and problematic. The plan anticipates additional parking up Bentham Street, west of Hutchins Street, but this is on steep ground, too far removed for the convenience of shoppers and inadequate. I have written separately, suggesting possible acquisition of Blocks 12 and 16 Section 64, at Hutchins Street immediately opposite the shops, for use as a public car park for the shops (my letter dated 18 March 2015).

**2.5 Excessive Excavation** - The proposal to excavate as much as 7.0m in the vicinity of Denman Street and the start of Dunrossil Drive is a matter of sheer vandalism. Apart from removing a whole woodland including valuable century-old elm trees, grassland and the habitat of the rare golden sun moth, it eliminates the 590m ASL ridge that currently provides a landscape feature to Adelaide Avenue and a green buffer to the residential suburb, both of which are important elements under the National Capital Plan.

**2.6 Access to Government House** - The plan to access Dunrossil Drive from the Brickworks road rather than from a main distributor road (Cotter Road) is an unfortunate compromise, reducing the length of the ceremonial drive by as much as 20%, with commensurate loss of ornamental deciduous trees and mixing official and ceremonial traffic with local traffic. This will inevitably cause inconvenient delays for the public on occasions when the passage of dignitaries will be given priority.



**2.7 The Flouting of Established Planning Principles** - The proposed development is inconsistent with planning principles required under the National Capital Plan 2014, the Canberra Spatial Plan 2004, the ACT Planning Strategy 2012 and the sustainable development principles of the ACT Territory Plan and the Estate Development Code 2013. Clear elaboration of these deficiencies is given in the Yarralumla Residents Association submission, as is also the case for most of the points I have stressed above.

In conclusion, I believe that your current proposal, LDA2015, indicates a serious dereliction of your obligations to effect good planning for the further development of Canberra's suburbs, and it should be either substantially further revised or totally abandoned. A copy of this letter will be sent to the National Capital Authority urging them to take an active interest in the process.

Yours faithfully

[REDACTED]  
[REDACTED]

Copies to:

- Andrew Barr, barr@act.gov.au
- Simon Corbell, corbell@act.gov.au
- Jeremy Hanson, hanson@parliament.act.gov.au
- Steve Doszpot, doszpot@parliament.act.gov.au
- Giulia Jones, jones@parliament.act.gov.au
- Shane Rattenbury, rattenbury@parliament.act.gov.au
- Meegan Fitzharris, fitzharris@parliament.act.gov.au
- Mick Gentleman, gentleman@act.gov.au
- Alistair Coe, coe@parliament.act.gov.au
- National Capital Authority
- YRA, info@yarralumlaresidents.org.au

[REDACTED]



[REDACTED]

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**From:** [REDACTED]  
**Sent:** Tuesday, 7 April 2015 8:38 AM  
**To:** Brickworks  
**Cc:** [REDACTED]  
**Subject:** Brickworks submission

Dear Sir/Madam,

We live at [REDACTED] and wish to make the following submission. We acknowledge the closing date for submissions was over the Easter Long Weekend but request that you accept this submission notwithstanding, as we had prior family commitments over the submission closing date.

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

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

Yours sincerely,

[REDACTED]

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Thursday, 2 April 2015 10:30 AM  
**To:** Brickworks  
**Cc:** [REDACTED]  
**Subject:** Canberra Brickworks and Environs Planning and Development February 2015

Date 2 April 2015

To:

Land Development Agency, brickworks@act.gov.au

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

Dear Sir/Madam,

I live at [REDACTED] and wish to make the following submission.

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

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

Yours sincerely,

[REDACTED]

[REDACTED]

Copy to:

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Mr David Dawes  
CEO  
Land Development Agency

Dear Mr Dawes

**Submission on the Canberra Brickworks and Environs Planning and Development Strategy 2015**

Firstly, I fully endorse the submission made by the Yarralumla Residents Association to the Canberra Brickworks and Environs Planning and Development Strategy 2015 and submitted on 1 April 2015.

I am very concerned about the traffic impacts the proposed development will have on Yarralumla and the surrounding suburbs.

Expert advice points out that the proposed Cotter Road extension into Deakin through the Mint Interchange would expose Deakin, Forrest, Barton, Griffith and the Central National Area to “rat running”, especially by car movements emanating from a portion of the expected 55,000 residents of Molonglo seeking to avoid worsening traffic congestion on the Adelaide Avenue and State Circle road network in order to reach office centres in Parkes and Barton. In addition, it would be highly dangerous for an extended Cotter Road to dump cars onto the Denison Street, Strickland Street, and Stonehaven Crescent network amidst the slow moving traffic that circulates throughout the health and medical precinct centred on Calvary John James Hospital. The solution proposed, to install more traffic lights, hardly seems to be an adequate engineering response.

The traffic modelling in the engineering reports for the proposed development provided seems to be mis-calibrated. The results of the AusTraffic from 31<sup>st</sup> July 2014 are included in Appendix A of the engineering report, but these real world traffic counts have not been used to update the Strategic Traffic Modelling, other than on Dudley St. For streets like Novar, Denison, Kent and Strickland, the Strategic Traffic Model shows counts at half the values from the 31<sup>st</sup> July 2014 survey results.

Under the traffic modelling many Yarralumla streets, including Maxwell, Banks, Woolls, Abbott, Denman and part of Bentham Street, are showing existing counts at zero which is clearly not correct. If one takes the example of Weston Street (between Novar and Hutchins streets) which is shown with an existing count of zero. The stage 1 traffic modelling shows the development adding 2,000 vehicle movements per day (vpd) to Weston Street and the Roads ACT actual traffic count from 2012 has the street with 1,880 vpd. Thus the stage 1 traffic modelling should be showing the traffic on Weston Street (between Novar and Hutchins streets) with a count of 3,880 vpd nearly double the model figure of 2,000 vpd.

In stage 3 of the development, Quarry Road is connected to Bentham Street and the traffic modelling shows a doubling of the traffic past the Yarralumla Centre and shops. Bentham Street at Yarralumla Shops is a car park, which fails to meet Australia Standards. ACT Roads have acknowledged that the accident rate at Yarralumla shops is one accident per day and most of these accidents are unreported. Doubling the traffic will gridlock this street and many of the surrounding streets.

The Estate Development Code, provides a simple mandatory metric for estimating traffic volumes for new development, "A rate of 6 vehicle movements per day per dwelling for multi-unit developments." The Yarralumla side of the development will be 1,500 dwelling (with 300 in West Deakin). Using the Estate Development Code metric, the residents of this new development will generate 9,000 vehicle movements per day. The traffic modelling provided in the engineering report, shows a figure of about half that obtained by applying by the metric in the Estate Development Code. The traffic modelling seems to be mis-calibrated and is providing erroneous results that are a significant under estimate. This in turn means that the suggested street hierarchy is incorrect and underspecified to meet the requirements of Estate Development Code.

Most the traffic generated by this new development will travel along Central Street and/or Brickworks. Brickworks Road is shown in the proposed development as a Minor Collector (1,001 to 3,000 vpd), yet the figures from the traffic model show this Road with 5,000 vpd which would place it at Major Collector level in the required street hierarchy. In addition not only is Brickworks Road the only direct connection to an arterial road (Cotter Road) for the new 1,500 dwellings, it is also a replacement for Dudley Street for traffic entering/leaving Yarralumla (4,170 vpd, 31<sup>st</sup> July 2014 traffic count). This means the likely traffic on Brickworks Rd is 6,001 to 10,000 vpd which places it in the range of Sub-Arterial Road requirements. Central Street is it the main access road to many of the new 1,500 residential dwellings and is likely to be in the 3,001 to 6,000 vpd range of a Major Collector but is currently specified as a Minor Collector.

Quarry road is shown as Access Street A (0 - 300 vpd), the traffic modelling show 2,700 vpd or a Minor Collector. The engineering report states that Quarry Road is included as a bypass road for traffic into existing Yarralumla to stop rat running of the new development. So the traffic on this road is likely to be in the 3,001 to 6,000 vpd range of a Major Collector. The Street Hierarchy of the development clearly needs to be reviewed and upgraded to comply with the Estate Development Code requirements.

The traffic model does not correctly show the existing traffic volumes and underestimates the traffic generated by the development. Most traffic modelling shows the following:

- Existing traffic volumes
- Traffic generated by development
- Total traffic volumes on roads.

The current model does not, however, use actual traffic count data and has not been validated. There needs to be a comprehensive survey to obtain current traffic counts of the existing traffic in Yarralumla and Deakin. The Mint Interchange will deliver traffic directly to Denison Street and this significant change needs to be modelling for both the local area in West Deakin and the wider area of including Deakin, Forrest and Griffith.

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3 April 2015

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## **Canberra Brickworks and Environs Revised Planning and Development Strategy February 2015 Comments**

Thank you for organising the drop in information session on Saturday 28 February 2015. In regard to the changes to the development proposal it was good to see the reinstatement of the Mint Interchange at the Cotter Road, Adelaide Avenue and Yarra Glen. Also the reinstatement of Dudley Street. The proposed traffic

Our points in regard to the revised planning and development strategy are as follows:

- We spoke with the traffic consultant at the information session to ask why Maxwell Street is not extended to link with the new Brickwork development. The consultant advised the Land Development Agency (LDA) said the park has to stay across the top of Maxwell Street.

Maxwell Street which leads into Banks and Weston Streets is a through street for the suburb; Maxwell Street is a direct route to the shops, lake and Weston Park. Common sense and good planning would dictate that Maxwell Street should be linked directly with the new development, as it is the through street. The design as shown raises the question why is LDA/Government minimising the traffic impact on Maxwell and Weston Streets? While Abbott and Kintore Streets being smaller streets will be significantly impacted to the detriment of the residents. Spreading the distribution of traffic across Maxwell, Abbott and Kintore Streets will help minimise the traffic impact. This is demonstrated in the development at Kingston Foreshore, where all the existing roads were connected to the new development, thus helping to spread the increased traffic.

In other new housing developments built in existing suburbs such as new Latham, Gaslight Estate in Evatt and Bruce (three distinct areas) the traffic is directed back to main roads. There are no roads linking the existing part of the suburb to the new development areas.

These examples demonstrate you either open all the streets up in the suburb to reduce the impact or you exclude them altogether. The planners of the past have obviously considered the existing residents, however in the case of Kingston it is simply linking the new high density area with the commercial hub of Kingston and other high density housing.

The proposal also shows Woolls Street being connected to the new development. This street is narrow and makes a long diversion to get to the shops. This again raises the question why is Maxwell Street, a road that is wider, more direct to the shops not being linked and utilised for the new residential development? The difficulty of navigating Woolls Street will force traffic to transit on Abbott and Kintore Streets.

The New development as proposed may more than double the population and traffic, changing the very nature of the suburb impacting negatively on the current residents, detrimental for amenity, peace and quiet enjoyment and for those in what

are now quiet streets turned into main streets having a further negative impact on the value of their property. Every resident negatively impacted by this development would be entitled to have their rates reduced.

- Cross road intersections prove to be accident prone. Many of the existing intersections in older suburbs have now been realigned so that these intersections require the driver to drive around the traffic calming device which stops vehicles going straight through an intersection. Following on from the traffic calming measures above, it is not logical to directly line up streets such as the extension of Abbott and Woolls Streets.
- The proposed park on Denman Street is very large. Usually the only area that will be utilised to a high degree is where there is play equipment or BBQ facilities. In most cases a large park is not utilised to its potential. This creates a park where residents do not feel safe to walk alone as public activity/interaction is far away if someone is being threatened.

The extension of Maxwell Street to the new development would split the park enabling significant extra parking bringing more people to the area to enjoy functions in the park, church or brickworks.

A parking area adjacent to the park on Abbott Street would be utilised by the Church on Sundays and at other times making it difficult for the park to be fully utilised during times of church functions. This further demonstrates that Maxwell Street should be linked to the new development with parking on both sides of the street thus allowing better flow of traffic, easy parking and easy access to the two parks.

- In the Community Needs Assessment dated February 2015 by SGS Economics and Planning Report, under point 3.11 Aged Care Services recommends “The suburb of Yarralumla could generate a need for around 44 residential aged care places by 2027. This demand could potentially be accommodated in one of the existing residential aged care facilities in Deakin, Hughes or Curtin.” In 2013/14 these aged care facilities were full and had waiting lists, which is the case in most aged care facilities in Canberra. Quoting population projections is one thing but unfortunately the reality is another. Our family has experienced first-hand on more than one occasion the difficulty in obtaining aged care in Canberra. The aging crisis is here now.

A number of inner south suburbs provide aged care facilities from self care through to high care. However this type of facility is not included in the planning for Yarralumla, which has an aging population that would love to stay in the suburb in what could be a landmark style development. A Monash Goodwin style development would attract huge interest and would be a valuable addition to the suburb as it would also provide significant employment opportunity.

The real estate market is already showing signs of an oversupply of units which may take years to fully occupy. There are more units being developed in the ACT than jobs and employment opportunities being created, so this oversupply may lead to a significant down turn to Canberra's economy especially if there is an interest rate increase.

The real need in the inner south is not for more high density A class units but for townhouses and cluster homes in a park like setting, similar to Shackleton Park in Mawson. This development was constructed in the early to mid 80's and is still highly sort after as there are no real alternatives available in any of the inner suburbs.

- Development access for contractors to the entire proposed development area should be restricted to a new access road off the Cotter Road. The removal of debris or hazardous materials such as asbestos under no circumstance should be through the existing streets in the suburb. Therefore no access should be allowed through Abbott, Kintore or Maxwell Streets during the development.

It would seem that the very sensible and complimentary development proposals such as aged care, diplomatic missions, cluster housing and premium single residential blocks have been totally ignored in the proposed Brickworks redevelopment. The LDA has strongly demonstrated that their motivation is for the biggest bang for the buck, to have as many rate payers as possible. This is a great location and should be enhanced by great planning that is sympathetic to the area would be a great outcome, instead of the agenda been driven by maximizing the number of apartments that can be developed.



4 April 2015

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Friday, 3 April 2015 5:57 PM  
**To:** Brickworks  
**Cc:** [REDACTED]  
**Subject:** Submission on Canberra Brickworks Strategy Document of February 2015

I am a Yarralumla resident at [REDACTED] and wish to record my dismay at the Agency's continued disregard of the concerns about their development proposals conveyed to the Agency by the Yarralumla Residents Association.

While the LDA is answerable to the government of the day in the first instance, it is the responsibility of that government to ensure that its actions take account of the concerns of its electorate. I assure the politicians to whom this submission is copied that my vote, and that of my acquaintances in Yarralumla and Deakin, in the next election will be determined by the responsibility they show in correcting or disavowing the lamentable shortcomings of the current strategy. While politicians might be motivated by the short term financial benefits of the land sales involved in this development, the long term harmful consequences to the current, and new, residents will be felt and expressed in future votes.

You have the thoughtful and constructive submission put forward by the YRA on 1 April. I fully endorse this submission and reinforce what they say about traffic consequences, communal consequences, and landscaping and the environmental impacts of the proposals in their current form.

[REDACTED]

Sent from my iPad

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Thursday, 2 April 2015 2:20 PM  
**To:** Brickworks  
**Cc:** [REDACTED]  
**Subject:** FW: Yarralumla brickworks

Dear Sir/Madam,

We, [REDACTED] live at [REDACTED], and have done so [REDACTED]. We fully support the Yarralumla Residents Association Submission to the Land Development Agency of 1 April 2015 on the Canberra Brickworks and Environs Planning and Development Strategy February 2015.

We also wish to make the following submission. They bear equal weight and should therefore not be considered as a 1-7 level of importance.

### **Topography and walking tracks**

At the Saturday information day there was the opportunity to talk to a number of people, both from the LDA and interested parties with independent views. There were two sides to the story. The LDA assured residents that there was no intention to have a 'scorched earth' outcome, ie that the new development would, "where possible" (and those are the key words) follow the natural contours of the land, whereas other people who were independent of the LDA indicated that many of the natural contours and ridges would be flattened out to make it easier and cheaper to build. It would seem that the independent people are closer to the mark, and it is an affront that the LDA thinks that it can treat the people of Yarralumla with such disdain. It was pretty apparent when you looked at the plans, drawings and even the model that the whole development is predicated on the land being as flat as possible.

We do not agree to this proposal, and wish to lodge an objection.

What protects the suburb of Yarralumla from the wind, dust and pollution that comes from Adelaide Avenue and beyond is the undulation of the land on which the proposed housing estate is to be sited. The impact on the proposed new housing estate and old Yarralumla will be horrendous – it will be dusty, dry and polluted; it will drift down into the suburb and ultimately will end up in Lake Burley Griffin either through the air or through the storm water systems as it washes down with the rain. Both to retain a 'healthy' suburb and follow sound environmental practice, the current landforms, buffering the development from the current suburb must be retained.

At the present time many people, Yarralumla and Canberra residents alike, walk, jog, ride, walk their dogs and in general actively exercise making great use of the shared use paths and walking tracks that are a feature of Yarralumla, and in particular around the proposed housing estate site, including the track that runs along the Canberra Golf Club at the end of Lane Poole Place through to Dunrossil Drive. Under the present proposal there is no connection between Dunrossil drive back to the proposed linear park or the proposed quarry park other than through the new housing estate. Not only are these walking tracks a permanent loss to the people of Canberra, they will be a loss to those who will move into the new housing estate as they will not have easy or ready access to the walking areas in Yarralumla. The proposed linear park is nothing more than an extra wide grassed nature strip. From reading the proposals all existing trees will be removed, and limited re-planting will occur. The proposed limited tree plantings will take years to grow to a decent size. This will result in a hot, dry, uninviting place that will serve little purpose. It will not be a focal point in the new development, just a dustbowl and a likely receptacle of all the rubbish that will blow around.

There should be connected natural parkland instead of a formal park along Denman Street, retention of continuous walking /cycling trails and a suitable environment for protection of the golden sun moth and natural temperate

grasslands within that corridor. Provision should be made for a shared continuous walking/cycling tracks to connect Dunrossil drive with all the park and recreational areas proposed. It is essential in a proposal where there is medium density apartment accommodation that people living there should have nice places to walk, which doesn't mean trudging the streets, especially in the hot weather.

### **Traffic flow.**

It is disappointing to see that there is little improvement in the potential for an influx of traffic from the new housing estate back into old Yarralumla. Under the present proposal, it is planned for 1800 new dwellings and on current trends most of those will have 2 cars per dwelling. Conservatively this would be around an extra 3000 cars. While there is an exit point onto Cotter road, the other main exit points are to come in at either end of Denman street where they will either go right and down Abbott street or left into Maxwell street and then into Weston Street ending at Novar street. Even with traffic lights at or near the Kent Street Bridge it will be increasingly difficult to turn right particularly from Abbott street which will result in cars turning left into Novar Street, increasing the traffic flow down through the suburb.

Access to the existing streets that run off Denman street should be blocked off (permanent bollards would work) to cars and so that traffic can be channelled either out the Cotter Road exit or the new road what will lead out to the Kent street bridge.

There must be a comprehensive traffic survey, with peer-reviewed modeling, of the existing suburb of Yarralumla, and adjacent suburbs to assess future traffic flows and impacts;

### **Loss of Green Space in Dudley/Novar Street**

In the early 1990s the Yarralumla community was involved in the planting of trees in the area bounded by Kintore, Novar and Dudley Streets and the Uniting Church. With our two young children we assisted in planting several trees and have enjoyed watching them grow. Every time we drive in that area, we remember the time when we and our son and daughter shared doing something constructive for the community. We have shown our grandchildren the trees that we all planted, and they are appalled and saddened at the thought that those trees are going to be cut down. They ask the question "why?" and we can't give them an answer and also ask "why?". This proposal will destroy the connection that our family together with friends and neighbours have with Yarralumla. If the development continues as proposed, it robs all Canberrans of areas in which we can regularly walk with friends as well as destroying a green space which we, together with our family and friends, helped create.

### **Shopping precinct and parking issues**

In one of the original discussions, there was talk of a shopping strip to accommodate the new housing estate. At the presentation at Yarralumla Primary School this was all very vague, with mention of a mini mart, possibly a cafe. The shops at Yarralumla currently cater for a population of around 3000 and it is struggling. Not only do we have shops and cafes we also have one side of the street with businesses, eg solicitors, doctor, etc. While I'm sure some of the shopkeepers will love to have access to another 3500 customers, the fact is that the current shopping/business precinct can't cope with the existing population. Parking is non-existent most of the time, and putting further parking at the top of Bentham street is not for the benefit of the shops but is more geared to the proposed Quarry Park. There are a great many elderly people in Yarralumla who would find it a hardship to lug their shopping 500 metres up a hill, especially in hot weather. The parking at Yarralumla shops is totally inadequate now and to add 3000 more cars will make it impossible.

A housing development of the size proposed both for number of dwellings (an increase of 100% + on what currently exists in old Yarralumla) warrants a shopping and business precinct of its own. Considering it is hoped that the Brickworks will bring more people into the area as visitors, it should be obvious that a shopping precinct would have great potential to thrive. Increasingly, Canberrans are enjoying going out for breakfast/brunch, especially on the weekends. Because of the lack of a shopping precinct in the new area, they will have no place to go other than out of the suburb and if they decide to drive to the existing Yarralumla shops, they will find nowhere to park their cars.

### **The Design of the new Development**

The current proposal of 1800 new dwellings, is outrageous. The proposal put forward in 2014 of 1500 dwellings was resoundingly rejected by the Yarralumla/Deakin community, yet the LDA thinks that 1800 dwellings would be more acceptable. It is nothing more than a cynical exercise to take even more land on the pretext that the dwellings will be reduced from 8 to 6 storeys, even though that height is also too high. This is made even worse by the proposal to flatten out all the ridges and undulations. The proposal put forward in 2010 for 900 is more the adequate and should be the maximum number of new dwellings. The development's scale must be reduced to one in keeping with the character of Yarralumla and site topography, with a mix of dwellings and heights, and none higher than 3-4 storeys

Even though the stated intention is to make this new housing estate aesthetically pleasing with street trees and grass verges, this can never happen. Many of the streets in old Yarralumla curve in and around the suburb. There are streets that are crescent shaped, have gentle bends in the road, and come off main roads at different angles. The new housing estate is a grid pattern. It is a reminder of the housing estates that were constructed post WW2 in England and other parts of Europe. They are utilitarian, lack total imagination and potentially will become the slums of the future. This style of development has been shown not to work and to generate social problems. Don't think that because it has the name "Yarralumla" attached to it that will be protected from social problems. The proposal seems to be for a vast number of one and two bedroom apartments, with a minimum number of 'family housing' of three or more bedrooms. This leads to a community that arrives home from work, drives into their underground car parks, enters their home, rarely entering into the outside world of their apartment building. Despite the so called green spaces they are not large enough or enticing enough for people within this new precinct to use them, and they are more likely to get in their cars on the weekend and go somewhere else. They will feel no ownership of their environment, which is something unique to the residents of Yarralumla. With no proposed shopping precinct with the potential for cafes, there will be even less reason to make use of their external environment

This proposed development is just too big. The area size of the proposed housing estate so small in comparison to the size of Old Yarralumla, yet you plan to put in more than double the existing housing stock.

No matter what the final figure is, (it should be reduced by 50%) there needs to be a definitive commitment and accountability by ACTPLA to make sure that the buildings being constructed have good garden spaces within each development. In Hampton street, Yarralumla recently there have been built three medium density complexes. One of them has minimal garden space in the front 4 townhouses. On the whole they are concrete constructions with wide concrete driveways under the building, service cupboards for dustbins and recycling and very limited garden space considering the size of the developments. We do not want or need the style of architecture that has been allowed around the Woden shopping Plaza or the new areas of Molonglo all of which resemble something that would not look out of place in China. This must not and cannot be allowed to be repeated in this proposed housing estate. An example of how to improve on this is the four storey developments on State Circle, which have wide grassed verges from the public footpaths to the front of the buildings and plantings from the balconies which now drape and soften the look of the buildings. Increased plantings around and on the buildings must increase the "health" of the building and environment not to mention being more aesthetically attractive to those people who will live there.

### **Canberra Brick Works**

There needs to be a revised strategy for the Canberra Brickworks and Environs that is consistent with the National Capital Plan. In 2010 we were told that the sale of the land was to repair, restore and revive the Canberra Brickworks so that it became an arts/crafts hub and an attractive Tourist attraction. While the amount to be spent on the brickworks has been increased, it does not restore the buildings to being useful or a precinct that anyone would want to visit, be it Canberrans or tourists. Unless the buildings are properly repaired and restored, and made useful again, any money that is spent to make them safe will be wasted. We will find in 10/15 years' time the conversation starting again on what to do with the brickworks, and there will be no land in Yarralumla left to sell to restore them. If this land is to be sold for redevelopment, with the resultant loss of amenity to the residents of Yarralumla, then enough money from the sale of the land must be set aside to repair and restore the brickworks to their full potential. Perhaps consider making this the permanent home for Floriade.

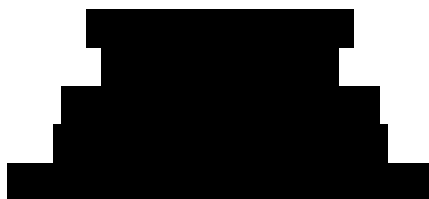
There must be transparency from the ACT Government on costings for preservation and adaptation of the core Canberra Brickworks elements, and calls for establishment of a formal trust, with Government funding, empowered to raise funds from the private sector and public.

## **Naming the new development**

Looking around at the presentation morning, many people were of the opinion that given the size of the development and the number of people who are expected to live there that it should have its own name and should not be part of the suburb of Yarralumla. This is a valid point. As construction starts it won't be long before clever real estate agents will start to talk about old and new Yarralumla, so why not start with a new name altogether. However, if great care is not given to make this an attractive place to live, you may find that Canberrans will refer to it as Yarraslumla, in the same way they did when the monocrete houses were constructed during the 1950s. Maybe Dunrossil would be somewhere to start.

Yours sincerely,

A black rectangular redaction box covering the signature of the sender.



Mr David Dawes  
Chief Executive Officer  
Land Development Agency  
[brickworks@act.gov.au](mailto:brickworks@act.gov.au)

### **SUBMISSION ON THE LDA'S CANBERRA BRICKWORKS PROPOSAL, FEBRUARY 2015**

Over the past few years the Yarralumla community have regularly been presented with proposals for the brickworks and environs. Award winning and renowned interstate planning firms such as Hill Thalys (Architects and Urban projects), Jane Irwin (Landscape Architects) and Elton Consulting have cost the ACT taxpayers thousands of wasted dollars on these proposed plans, which do not integrate or account for the issues raised by the local community.

Now once again Yarralumla residents are presented with a proposed development for the brickworks which also encompasses all the surrounding open spaces. And once again the government has ignored the community's concerns on:

- inappropriate consideration of the impact of traffic flow on Yarralumla streets
- inappropriate density and number of proposed housing
- inappropriate height of buildings
- dramatic increase to parking demands at the local shops
- complete disregard for the National Capital Plan
- inappropriate change to the ceremonial drive to Government House
- insufficient funds for restoration of the brickworks
- loss of open green space

#### **Traffic flow.**

Already traffic flow through Yarralumla in peak morning periods has increased since completion and habitation of the first Weston/Molonglo suburbs. When Adelaide Avenue congests, and this happens often during AM peak time, cars "rat run" into Yarralumla, then along Weston Street to Hopetoun Circuit, using the on ramp to access Adelaide Avenue via a dedicated lane, much easier than banking up on the Cotter Road waiting to integrate onto Adelaide Avenue. However this increase in traffic directly impacts on children riding their bikes and walking to schools. As more Molonglo/Weston suburbs come on line common sense says this traffic can only increase. **Unless the Cotter Road flyover/Interchange to the Deakin commercial area is completed as first priority the whole area will become more chaotic.** We have concern at the proposed three sets of traffic lights at either end of the

Novar/Kent Street bridge over Adelaide Avenue. To date traffic lights in Canberra generally are not very well co-ordinated so one can hope these 3 intersections will be strictly co-ordinated. If the brickwork proposal proceeds, three streets, Abbott, Maxwell and Woolls, will become main thoroughfares. These are quiet residential streets that were not built to take this capacity of traffic and we can't understand why Woolls Street has been designated as a thoroughfare as it encompasses a sharp right angle bend.

### **Density and number of proposed housing.**

The sheer density of the proposed housing estate will lead to many problems. Conflict resolution research shows that since infill has been implemented there has been a huge spike in reported neighbourhood conflict and living in such a density is a recipe for future health problems. Some of the problems surfacing include noise, lack of privacy, parking, lack of secure outdoor space, vandalism, and with 60% of properties in the new development predicted to be rentals we have to ask the question; are we creating unsustainable densities and robbing future generations of biodiversity?

### **Height of buildings.**

The majority of building heights in Yarralumla consist of single storey homes, followed by double storey homes and townhouses and a small number of three and four storey apartments, mainly backing onto Adelaide Avenue. The plot ratios will be smaller (currently approximately 780 square metres with larger blocks in the Embassy area) however it is our belief that any new residential buildings should conform to the general residential character of Yarralumla.

### **Parking at the shops.**

Yarralumla has a high proportion of ageing residents (last census 30% over 60) who already find it difficult to park at the shops and access the chemist, medical centre, supermarket, drycleaners, post office, etc (just ask the medical centre receptionists trying to accommodate sick/elderly patients). Three thousand (more than doubling the suburb) additional residents in the planned extension to Yarralumla with only plans to add a mini mart and café to this new area, will increase congestion and chaos for parking at the shops. This is going to seriously hurt our vulnerable elderly residents. Do you have elderly relatives and has any thought at all been given to the elderly in Yarralumla? Many residents already shop at Deakin (which is also congested) and this will considerably add to their parking woes (gym clients parking at Deakin shops) and so the effect snowballs.

### **National Capital Plan.**

The National Capital Plan is a strategic plan for Canberra. It ensures that Canberra and the Territory are planned and developed in accordance with their national significance including

- a. respect for the key elements of Walter Burley Griffin's formally adopted plan for Canberra
- b. creation, preservation and enhancement of fitting sites, approaches and backdrops for National Institutions and ceremonies as well as National Capital uses.
- c. the development of a city which both respects environmental values and reflects national concerns with the sustainability of Australia's urban areas.

This recognises the values of the unique purpose, setting and character and symbolism of Australia's national capital.

The Yarralumla brickworks proposal plans for 215,000 cubic metres of "cut and fill", with ridges from near Dunrossil Drive through to the brickworks being cut between 2 and 7 metres, and the soil used to fill low lying areas. This is a large area and encompasses destruction of all of Walter Burley Griffin's planned buffer zone ridge and complementary tree plantings between the inner city suburbs and the satellite town and suburbs of Woden. This is **definitely contrary to the National Capital Plan**. This leads us to the ceremonial drive to Government House.

### **The ceremonial drive to Government House.**

Presently the drive from the Cotter Road down to Government House has always been regarded as a ceremonial drive. It is planted with heritage protected trees (some of which have been recently replaced). It is a quiet and rather beautiful avenue used only by the Governor General, his staff and visitors or by tourists and walkers/bike riders who park their cars and use the walking/bike path which winds along the lake foreshore from outside the gates of Government House and circumnavigates the entire lake. A sharp dogleg from near the Cotter Road will change the ambience of the avenue and at the Cotter Road end this avenue will not only be shared by the residents who will live in the proposed new development but will be at that point part of suburbia. **Therefore the ceremonial avenue of Dunrossil Drive will be compromised and this will be contrary to the National Capital Plan.**

### **Restoration of the brickworks.**

Money has only been allocated to make safe the site and conserve the kilns, not to restore, preserve and maintain the kilns. The brickworks is Canberra's "first factory", built to facilitate Canberra's construction and has a high level of historical, scientific, aesthetic and social value to both the local area and the broader Canberra region. The restored kilns could and should provide future generations with a window onto the early days of Canberra's development. The different kilns and ancillary brickworks buildings, demonstrate the changing processes of brick and clay production. The Staffordshire kiln was the first of its kind to be used in Australia and is believed to be the only surviving example of this kiln type in Australia and one of only a few left in the world. The brickworks ceased operation in 1976. Lack of maintenance and wilful neglect of the structures by successive government bodies over the years has led to a continual deterioration of the fabric.

### **Loss of open green space.**

Green spaces are the lungs of a city and our urban lung capacity is being frittered away by insensitive development. Governments are selling off our green spaces and developers are designing homes surrounded by impermeable surfaces simply because they can cram more buildings into a footprint thus generating more profit. Maintaining green space is important and increasingly of significance in Yarralumla where new large homes encompass a large percentage of the block, much of what is left is given over to paving or low hedging. The international scientific community recognises that carbon emissions must be reduced. The ACT government's Territory and Municipal Services Department concur and accept the

reality of climate change. It is indisputable that trees play a large part in the reduction of carbon emissions.

**In conclusion** we feel that the economic problems of the ACT Government will override the objections and sensible argument of not only the residents, but Urban Ecologists such as University of Melbourne's Dr Mark McDonnell, Australian Institute of Landscape Architects, environmentalists and conservationists. Not to mention the ACT governments approved ACT Heritage Council's Conservation Management Plan Report by respected heritage specialists Lovell Chen (June 2010).

We have always believed in Abraham Lincoln's words from his great speech, ie that government is of the people, by the people, for the people. That translates to; consulting with the residents, listening to their views and compromising to suit those same people. In the last few years this has not and does not appear to be happening. It is to be hoped that after years of consultation the brickworks can now be restored, preserved, maintained and finally acknowledged as having made a very important contribution to Canberra's history and that a satisfactory compromise can be found with Yarralumla residents for the open green space and the community's concerns on the abovementioned issues.

[REDACTED]  
29 March 2015

[REDACTED]

Mr David Dawes  
CEO  
Land Development Agency

Dear Mr Dawes,

### **Submission on the Canberra Brickworks and Environs Planning and Development Strategy 2015**

The first point I would like to make in my submission is that I fully endorse the submission made by the Yarralumla Residents Association to the Canberra Brickworks and Environs Planning and Development Strategy 2015 and submitted on 1 April 2015.

In my view the proposed development fails ACT and Commonwealth planning and development policy and legislation requirements and those for the protection of heritage, biodiversity, critically endangered species and communities.

The approach taken by the Land Development Agency is to consider the development as a greenfields development and as such the sole considerations are those within the site area and that relate to the viability of the development itself. The development will, however, sit at the centre of the suburbs of Yarralumla, Deakin and Curtin be connected to them through existing streets and civil infrastructure and will rely on current shops and community facilities.

Yet none of these important factors have been considered let alone assessed. For example from a simple site inspection the Yarralumla Centre and shops in Bentham Street it would have been apparent that it is not feasible to bring an additional 2700 vehicles per day through and street area that is essentially already a dangerous parking lot. That this routing of traffic is proposed in order to avoid rat running within the new development itself re-enforces that external impacts are disregarded. Similarly Woolls Street is a short narrow street only 6m or less wide, with a right angle bend in it, on street parking and the garbage bins are place on the road on collection day. Yet this is proposed as a main access street from the development to Yarralumla. These examples raise the question as to what due diligence has been undertaken in determining these connections and whether there has been appropriate duty of care.

Existing traffic volumes in Yarralumla have neither been measured nor taken into account. Similarly there has been no assessment of traffic flow requirements along the major arterial roads given the new suburbs at Molonglo. There is likely to be a significant impact of the changes to the arterial roads and other road infrastructure associated with the development, for example the removal of the T2 traffic lanes on Adelaide Avenue to create bus stops and the channelling of traffic into Dennison Street in Deakin. This should be done.

An extraordinarily large cut of 7 metres and fill of 9 metres is proposed to level the whole 49ha site. The removal of all current landscape scale ridges, forest, woodland and grassland is environmental destruction on a large scale that takes with it the green corridor that provides critically endangered sun moth habitat, natural temperate grassland, highly valued walking and cycling trails in open bushland. A significant component of Dunrossil Drive is also removed together with its heritage listed avenue planting of elm trees from 1918.

The development also changes the processional route from Parliament House to the Governor Generals residence from one through bushland with vistas of the mountains to one through a high

density housing estate this is contrary to the National Capital Plan for the Canberra Central Area for this designated Main Avenue and Approach Route. This processional route will become flat and treeless with no direct entrance only one via the road that is the main access for a multi storey high density housing estate of 1500 dwellings with commercial and residential traffic and heavy requirements for visitor and overflow parking. Security road blocks imposed for high ranking visitors to Government House will force residents to access the estate through the unsuitable narrow access roads in Yarralumla outlined above. This is not acceptable nor appropriate for the National Capital of Australia.

Moreover this flattening of the landscape will create more than a decadal heat island and dust bowl. Recent ANU data confirms that even moderately forested suburbs were 7 °C cooler during the 40°C days in the summer of 2013-14. The removal of all vegetation, including the more than 2000 trees, will substantially heat up and acidify the wider urban environment of Yarralumla.

There are considerable risks from the proposed earthworks both within and outside the development area which have not been considered. The complete restructuring soil profiles and topography to the depth and extent proposed will fundamentally change the hydrology not just of the site but the adjacent residential areas, golf course, road works and services. Soil fills up to 9 metres deep risk being highly unstable when saturated and the costs of housing construction exceedingly high. The changed sub-soil hydrology will have an impact well beyond the developed area and the death of trees could extend to the heritage listed Westbourne Woods and Government House.

I do not understand why the local community should be forced to fund the Mint Interchange at a cost of \$50m, which is infrastructure for the whole of Canberra, through now an even larger development proposal of 1800 dwellings in total, given the external impacts outlined above.

Given the above I do not understand why such a paltry amount of \$5m is potentially set aside to preserve the Canberra Brickworks heritage buildings. Moreover how can this amount can fund warm shell adaptation when it is about one tenth the funding identified as necessary for this purpose in 2010. Protection of this heritage is a matter for the whole of Canberra and should not be inadequately and forcibly funded from a development that will have such major impacts on the three existing suburbs.

The Canberra Brickworks and Environs Planning and Development Strategy 2015 put forward by the Land Development Agency is not acceptable or appropriate. The many reports to the planning and development agencies since 1986 have all recommended much smaller scale medium density development in Yarralumla that is contained between the Canberra Brickworks and the ridge line to the south and west. This would avoid the dire impacts outlined above and I ask that this be actively assessed.

██████████

██████████

Yarralumla

ACT 2600

3 April 2015

████████████████████

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Saturday, 4 April 2015 4:45 PM  
**To:** Brickworks  
**Subject:** Re: Canberra Brickworks + Environs: Comments close 4 April

I think the Brickworks development plan is marvellous and I say that as a former professional urban planner. I a few years my husband and I may move there if there are townhouses with lifts for those of us getting on in years.

I find the opposition from locals shortsighted. More inner South housing will help many Canberra residents.

[REDACTED]

Sent from my iPhone

On 2 Apr 2015, at 17:55, Brickworks <[LDABrickworks@act.gov.au](mailto:LDABrickworks@act.gov.au)> wrote:

Good afternoon

Just a reminder that you can still provide feedback on the revised Canberra Brickworks + Environs Planning and Development Strategy. **The comment period closes this Saturday, 4 April 2015.**

The following reference materials are available on the Land Development Agency (LDA) website:

- The full Planning and Development Strategy and appendices can be found on [The Strategy > Planning & Development Strategy page](#)
- Display boards from the community drop-in session held on 28 February, along with the results of a recent phone poll of 1,400 Canberrans about the proposed development, are on the [Consultation > Current Consultation page](#)
- A video providing a brief overview of the project can be found on [The Vision page](#).

All feedback and comments received by 4 April will help inform the final project design and CB+E Planning and Development Strategy that will be submitted through the statutory approval processes. We will provide a summary report of this round of community engagement on the LDA website after the comment period closes.

You will have more opportunities to provide comments during the statutory processes that follow, which include:

- Referral under the Environment Protection and Biodiversity Conservation Act 1999 (Commonwealth)
- Variation to the Territory Plan
- Amendment to the National Capital Plan
- Estate development approval under the Planning and Development Act
- Individual Development Applications for residential dwellings.

We look forward to hearing from you.

Kind regards

Community Engagement

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This email, and any attachments, may be confidential and also privileged. If you are not the intended recipient, please notify the sender and delete all copies of this transmission along with any attachments immediately. You should not copy or use it for any purpose, nor disclose its contents to any other person.  
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