

[REDACTED]
4 April 2015

Land Development Agency
TransACT House
470 Northbourne Avenue
Dickson ACT 2602

Submission on the Planning and Development Strategy for the Canberra Brickworks and Environs

Thank you for the opportunity to provide comments on the latest plans for development of the Brickworks and surrounding areas.

We fully support the YRA's submission; however, [REDACTED], we would like to add some specific comments relating to the plans for the Quarry Park. We also note that most of the concerns raised in our 2014 submission (which follows) have not been addressed.

The Quarry Park

The differences between the 2014 and 2015 plans are the extension of Quarry Road to Bentham Street rather than it terminating in a dead end before Bentham Street and the number of dwellings to be built along Quarry Road has been reduced.

Quarry Road

Quarry Road is categorised as an Access Street A which is designed to take up to 300 vehicles per day. This volume is inconsistent with its objective of preventing rat-running through the new development. It is likely to become the main route to the golf course and existing Yarralumla for all traffic coming from Tuggeranong, Gungahlin, Belconnen, Weston, Curtin and Molonglo as well as traffic from the new development. Thus traffic volumes would be many times more than 300/day.

We note that the intersection with Bentham Street is planned to be closer to the golf course than in the 2010 plan, presumably because the 2010 intersection was on the bend in Bentham Street and thus very dangerous. Although the intersection in the 2015 plan is above the bend in Bentham Street, we believe it will still be a dangerous intersection as vehicles approaching along Quarry Road will have to negotiate what is likely to be a steep rise and may have trouble seeing vehicles coming up Bentham Street towards the golf course. Even if the rise was slight, vehicles coming up Bentham Street would not be visible until they rounded the bend. Similarly the vehicles coming up Bentham Street would not have a good view of the intersection until they rounded the bend and were almost at the intersection.

Quarry Road Dwellings

In the 2014 plan, dwellings were planned along the full length of Quarry Road, ie almost to Bentham Street. In the 2015 plan the dwellings do not extend as far. However, exactly how far is unknown. The plans presented at the 28 February information session and in the newsletter

distributed prior to the session differed from those presented by LDA representatives to residents of Schomburgk, Woolls and Bentham Streets at a meeting **only 3 days later**, in that they extended further towards Bentham Street.

The LDA's preferred option in 2010, said that the quarry residential development would be terraced housing with a buffer of green parkland between existing townhouses that adjoin the quarry and that the land would be levelled so new housing would be on the same level as existing housing. At the associated information session, the project director confirmed that no new residences in the quarry would be higher than existing residences. Although we have been told that the actual height of new dwellings in the current plan has yet to be determined, this undertaking seems to have been dropped. The only height information we have is that drilling in the Quarry mound has found that the ground is still unstable 3 metres below the current surface. Until the relative height of new and existing dwellings is known, it is not possible to determine how such things such as sunlight and privacy will be affected.

A *Canberra Times* article prior to the 2014 information session, presumably based on an LDA press release, restated the 2010 plan feature that there would be green spaces between all existing and new residences. This was reaffirmed by the guide for the Brickworks tour at the 2014 information session. The current plan does not seem to make provision for such green spaces between existing residences and new residences in the Quarry.

We believe the costs of earthworks, stabilisation and road construction to facilitate dwelling construction in the Quarry may not make the building of a small number of dwellings cost effective. Building townhouses along Bentham Street above the bend would be much more cost effective as no road construction and very little earthworks would be required. In addition, dwellings could be built along the boundary between the Brickworks and the Quarry. Very little earthworks would be required and a road to service such residences would be much cheaper to construct.

As we stated in our 2014 submission, justifying construction of dwellings in the Quarry Park for security is a furphy (see 2014 submission following). Construction of dwellings along the Brickworks-Quarry border would be much more effective as far as security is concerned and would not require extensive earthworks.

Given that the prevailing winds come from the west, any dust and other air-borne contaminants stirred up by earthworks will be blown towards existing residences which are to the east of the Quarry. What will be done to protect the health and safety of nearby residents from dust and possible dangerous contaminants while earthworks associated with Quarry Road are taking place?

Conclusion

We do not support the construction of Quarry Road and associated dwellings and believe it would be much more cost effective and less intrusive to existing residents to construct dwellings along the straight section of Bentham Street above the bend and along the boundary separating the Brickworks from the Quarry.

Once again, thank you for the opportunity to provide our views.



July 2014 Submission

Submission on the Planning and Development Strategy for the Canberra Brickworks and Environs

Thank you for the opportunity to provide comments on the plans for development of the Brickworks and surrounding areas.

Before providing our comments, we should state that we are not against development per se. However, we have serious concerns about aspects of the current plan.

Demand

The LDA's Information Update distributed earlier this year says that by 2033, 'we will require 45,000 more dwellings'. This seems to be in conflict with the recent decline in demand and the LDA's revised land release program for the next four years. However, even assuming the 45,000 demand, surely current developments at Molonglo, West Belconnen, Lawson, Flemington Road, Northbourne Avenue corridor, Harrison 4, Kingston Foreshore, Bonner, Jacka, Franklin, etc will satisfy demand.

Certainly, such high density as proposed for 'new Yarralumla' does not seem necessary.

Density and Facilities

The density of the new development is much too high. It is unprecedented in suburban Canberra.

The plan provides for 1,600 new dwellings providing for approximately 4,000 residents. This will more than double the population of Yarralumla and these new residents will be accommodated in an area less than one third of the existing residential area.

Such high density residential development is usually confined to areas surrounding town centres. However, the current plan does not include any community facilities/amenities and the existing Yarralumla shops already have significant parking problems with concomitant safety issues. Contrary to what is stated in the Information Update, 'new Yarralumla' is not conveniently close to transport, shops and services.

Harmony

Given the unprecedented high density and the plan to develop dwellings of 2 to 8 stories, 'new Yarralumla' could hardly be said to be in harmony with the existing suburb where the vast majority of dwellings are single storey. The envisaged housing mixture could not be said to be a diverse mix.

Inclusion of embassies, single storey dwellings and perhaps a retirement village should be considered so that the development is not just a mass of units in 2 to 8 storey blocks. Rows of 2 to 8 storey dwellings could hardly be said to be consistent with the 'key feature' which states that 'a variety of housing types, scales and forms are provided to suit the diverse demographic of inner Canberra' as outlined in the 'Canberra Brickworks and Environs Planning and Development Strategy' document on the LDA web site.

Traffic and Parking

Given the current plan does not include the interchange at the Adelaide Avenue and Cotter Road intersection as envisaged in the 2010 plan, significant traffic problems will arise under the current plan. These will be magnified as more people move into the Molonglo suburbs.

The plan does not include provision for parking for visitors to the Quarry Park or the Brickworks, nor does it address the significant parking issues at the Yarralumla shops. However, as the only work planned for the Brickworks is 'make safe' perhaps no associated parking will be necessary. (We note that 'make safe' is not consistent with the objective of 'Restoration of the Canberra Brickworks to create a major new destination in Canberra' listed as a 'key feature' in the 'Canberra Brickworks and Environs Planning and Development Strategy' document.)

The Quarry Park

The justification for siting residences in the Quarry Park seems to be to provide security. This justification is a furphy. Almost all, if not all, of the existing residences backing onto the quarry reserve have living areas and courtyards/decks which look out over the quarry reserve. Additionally a number of the residents own dogs who alert owners when anyone is in the quarry area. The requirement for security does not apply to the quarry reserve but to the Brickworks themselves which, according to Lane Poole Place residents, are visited by vandals and other trouble makers. The area of the quarry reserve which adjoins residences in Bentham, Schomburgk and Woolls Streets has very few visitors apart from the residents themselves and maintenance workers. There is nothing in this area to attract vandals.

The LDA's preferred option in 2010, said that the quarry residential development would be terraced housing with a buffer of green parkland between existing townhouses that adjoin the quarry and that the land would be levelled so new housing would be on the same level as existing housing. At the associated Information Session, the project director confirmed that no new residences in the quarry would be higher than existing residences.

A *Canberra Times* article prior to this year's Information Session, presumably based on an LDA press release, restated the 2010 plan feature that there would be green spaces between all existing and new residences. This was reaffirmed by the guide for the Brickworks tour at this year's Information Session. The 2014 plan of the development does not seem to make provision for such green spaces, particularly for those townhouses closer to Bentham Street.

Although we have sought details of the heights of the quarry 2 storey residences relative to existing townhouses and the distances between new and existing residences, such information has not been made available. However, from the Site Section diagrams on page 46 of the 'Canberra Brickworks and Environs Planning and Development Strategy' document, the heights of the envisaged residences would seem to be much higher than most existing residences. Indeed it seems that the proposed dwellings will be situated on top of or close to the top of the existing mound. The mound is already higher than many of the existing residences. If 2 storey units are built on top of the mound, they would effectively be like 4 storey buildings relative to the existing residences. Current residents, understandably, are concerned about how much afternoon sun will be blocked by the new buildings. Such buildings towering over the old residences will also result in a significant loss of privacy and reduced outlook aesthetics. Will existing residents be compensated for any devaluation of their properties due to reduced sunlight, lack of privacy and reduced aesthetics?

The mound is known to contain bricks and other discarded materials and is not stable. What analysis has been done to assess whether the mound and surrounding quarry areas are not contaminated by asbestos or other materials?

The stabilisation of this area to allow for building is likely to require considerable effort and cost which could make the associated dwellings economically unviable. Even if the costs are not prohibitive, the earthworks required will be significant. Given that the prevailing winds come from the west, any dust and other air-borne contaminants will be blown towards existing residences which are to the east of the quarry. What will be done to protect the health and safety of nearby residents from dust and possible dangerous contaminants while such earthworks are taking place?

There should be no building on areas where fill has been used.

Conclusion

The current plans should be withdrawn and new plans developed in cooperation with all stakeholders, in particular the Yarralumla and Deakin Residents Associations. In this way the planning process will be informed by all interested parties, be more transparent and would involve ongoing consultation rather than a compressed consultation period at the end of a long planning process.

Once again, thank you for the opportunity to provide our views.



[REDACTED]

From: [REDACTED]
Sent: Friday, 3 April 2015 5:32 PM
To: Brickworks
Subject: Further feedback on your revised strategy

Dear LDA people

Congratulations. Your ambit-claim strategy appears to have worked brilliantly, if the telephone poll results are legit. Goebbels would be very proud.

I'm particularly impressed by how you have used your pretence of listening to residents' concerns about shopping to actually *reduce* by nearly a third the amount of mixed-use space in the new development. Okay, you are now providing an area roughly large enough for a corner store and a tiny carpark in the Yarralumla section where there was nothing before, but at the cost of nearly halving the area available in West Deakin, thereby making certain it will not attract a shopping-centre developer proposing something large enough to be anchored by a Woolworths Supermarket and an Aldi.

And Hitler would still be proud of your brutalist approach to developing this site. I'm told that brutalism extends to clearfelling every tree on the site, many of them older than I am, and many of them planted as a windbreak for houses in Yarralumla, a role for which they are surprisingly effective. Given the venturi-acceleration of the trade winds soon to be provided by your beloved high-rise buildings, current residents there are really going to be blown away by this plan. In a time when any resident of Yarralumla attracts the wrath of the ACT government should they cut so much as a branch from any tree on *their* property, this takes a peculiar chutzpah even for you.

My damaged back won't stand up to being chained to a tree, so you will be spared any nuisance-value I might otherwise have provided. Anyway, I know when I am up against a bureaucratic manipulation of Orwellian proportions, and sometimes you just have to let the bad guys win.

Yours faithfully

[REDACTED]

From: [REDACTED]
To: brickworks@act.gov.au
Subject: Submission re Development Proposal
Date: Fri, 11 Jul 2014 19:51:07 +1000

[REDACTED]

Phone: [REDACTED] (all hours)

Mobile: [REDACTED]

Email: [REDACTED]

Land Development Agency
TransACT House
470 Northbourne Ave
DICKSON ACT 2602

Email: brickworks@act.gov.au

Dear LDA people

Re: Canberra Brickworks and environs proposed redevelopment

I was born in Yarralumla [REDACTED] to be precise – and I spent the first seven years of my life there.

As a boy growing up [REDACTED] from the site of the proposed redevelopment I imagine I covered pretty much every square inch of the site one way or another.

While I was trespassing on the grounds of Government House, most of today's Deakin, the part west of the Girls Grammar School, was a sheep station. When my parents bought land and built the family home at [REDACTED], there was still a herd of sheep watching curiously from three houses up the hill, and they continued to watch for a decade thereafter.

While continuing my education both secondary and tertiary from the family home in Deakin, I did not lose touch with old haunts in Yarralumla. Remarkably, my [REDACTED] neighbours [REDACTED] are *still* in residence at [REDACTED]. If you wanted to know about the capacity of the sewerage system you could do a lot worse than consult with [REDACTED]

[REDACTED]

[REDACTED]

I would have had cause to visit the Yarralumla shops scores if not hundreds of times over the last decade, and more often than not there has been no parking available, and traffic has been hopelessly snarled as people wait in the forlorn hope someone will soon be leaving.

Mind you, the problem is often worse at the Deakin shops, where traffic, queueing to get into the parking area off Hopetoun Circuit, often backs up several cars deep into that main artery.

And the same is increasingly true at the Curtin shops, the nearest centre for a major supermarket (in this case Coles).

I travel from Deakin to Belconnen by car at least once a week, using Dudley Street to get to the Cotter Road and then Lady Denman Drive etc.

With that background I make the following suggestions:

1. The proposed development is clearly an absurd ambit claim designed to muffle objections to something still utterly objectionable but yet the lesser of two evils, when you produce it as your "compromise". I'm guessing the plan that eventually emerges from TransACT house, purportedly as a product of much negotiation and consideration after lengthy consultation with the community, will look a great deal like your original 2010 proposal. I won't play this silly game.

2. You would have to be clinically insane to double the number of residents in Yarralumla while providing virtually no new facilities. You are effectively putting in a new suburb, and as such it should have its own suburban shopping centre with easy pedestrian access from all new residences on the Yarralumla side of the site. By all means put in a major supermarket under one of the residential/commercial towers on the West Deakin part of the site -- by the way, make it a Woolworths supermarket, since we already have a Coles at Curtin (and at Manuka), IGAs at Deakin and Old Yarralumla, and Aldi is not a true supermarket but a retail outlet for a limited range of inferior-quality home brands, all of them, like Aldi itself, 100% German-owned -- but don't kid yourself that every Yarralumla-resident shopper there is going to walk a kilometre or two over the Kent Street overpass (or run across six lanes of traffic) carrying their weekly shopping (or even that key ingredient for the evening meal).

3. You would have to be clinically insane to double the number of cars in Yarralumla, at the same time as inviting the residents of the new suburbs at Molonglo to compete for space on the Cotter Road (especially when you propose closing Dudley Street), without building the Mint Interchange. You compound the felony by forcing me, and many thousands of road users like me, to drive *into* Yarralumla to use one or other of the suburban streets which ultimately connect with Brickworks Road, which I understand is now to be the only access to the Cotter Road and thus Belconnen, rather than skirting the suburb on Dudley Street as we do now. As for the present gridlock at peak hours in West Deakin, and the difficulty finding parking there, not only does this add to the compelling case for the Mint Interchange but also to the case for underground car parks beneath all three (or four) towers of a capacity to accommodate not only the cars of residents and customers of the commercial space but preferably also some casual parking for visitors to businesses on the other side of Denison Street and in Kent Street.

4. Perhaps you think all traffic and parking problems, present and future, will be solved by putting a bus stop down on Adelaide Avenue and making the express buses stop there, or perhaps you think the money you save not building the Mint Interchange will buy you light rail

(as apparently we call trams these days) down the Adelaide Avenue median strip and all the way to the city and to Woden. I am a regular user of Canberra's buses, and look forward to the guilty pleasure of using the economically-unjustifiable light rail from the city to Gungahlin, but this is on a par with ACTION closing the most popular bus route through Deakin, the one to Manuka-Kingston-Railway-Fyshwick, in the deluded belief bus patrons would happily spend an extra half an hour going via Barton and a change of buses to get to these places. Amazingly enough, they used their cars (or taxis) instead.

5. I imagine you picked up the grid layout for this new suburb from some Berlin plans left over by the Nazis. I appreciate that most of your planning is done without regard to topography or aesthetics but this one really takes brutalism to a new extreme. I'm sure that in ambit-ese eight stories means four and six stories means three, but even at these more modest heights, this development will be the kind of blot on the landscape usually reserved for Housing Commission projects. Surely the land would be worth more if an imaginative street layout made use of the contours and allowed for greater passive-solar possibilities.

6. I assume the new street names are just generic, pending some process designed to find names suited to the history of the site (or alternatively are some elaborate joke to see if there is anyone sufficiently cynical about the dearth of creativity at the responsible department to believe they can be genuine).

7. I admired your chutzpah in suggesting that "Dunrossil Park" will be the equivalent of Telopea Park and Haig Park, but I was utterly gobsmacked by your extension of this comparison to the pretend park on Denman Street! As for the Quarry Park, your PR guff here sets new standards for making a virtue out of necessity. (Or should that be something about lipstick and pigs?)

8. I know you take it as a badge of honour to ignore the national implications of anything you do so it is pointless observing that visiting dignitaries making their inevitable visit to Government House will be confronted by this residential concentration camp as a visual example of how Australia thinks people should live.

9. I note that you have suckered the National Trust into thinking that this development will provide a continuing income stream for the preservation and presentation of this unique historical site, the brickworks themselves, when all you will do is spend \$1.5 million on making the site "safe" and then pocket the rest of the cash. Surely the land would be worth more if the development was integrated into a comprehensive and effective plan to preserve the brickworks and present them to the public for the historical attraction they can surely be? Anyway, don't you owe some kind of obligation to the brickworks without which you wouldn't have this choice development site to seize with your money-grubbing hands?

10. I see no mention of the proposal to do a land swap with the North Curtin Horse Paddock. I am not across the detail of this proposal, but its immediate attractions are obvious, not least the prospect of putting something as quintessentially vice-regal as equestrian activities at the gateway to Government House, and dramatically reducing, by putting all the horses on the north side of the Cotter Road, the probabilities of future collisions between cars and horses on

the Cotter Road (especially when the crossing points are widened from two lanes to four and even six). I seem to recall that there is an historical bridle path through the southern section of the brickworks site which could well be re-opened with all the appropriate nods to its historical role. Take all these new residents to the North Curtin Horse Paddock and many of the traffic problems take care of themselves. No new provision of shopping facilities would be needed given the present under-utilised nature of the semi-regional Curtin shops with their Coles supermarket and superfluity of specialty stores (to say nothing of capacity for major expansion on-site with underground parking etc). McCulloch Street already serves as an arterial road linking the shops to the Cotter Road.

My late father, [REDACTED]

[REDACTED] used to say that Canberra had a peculiar talent for acquiring the dregs when it came to planners (and especially traffic engineers). I hope he was right in his view that there is no such thing as an afterlife, otherwise I'm sure being forced to watch this travesty would be his idea of hell.

Yours faithfully

[REDACTED]

To whom it may concern,

Within is my consolidated response to the Yarralumla Brickworks and Environs Planning and Development Strategy (The Brickworks), February 2015.

Kind Regards,

A large black rectangular redaction box covering the signature area.

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General

The issues below are what I consider to be the significant remaining outstanding issues. I am also very interested in the detailed design of the redevelopment of the to ensure a very high quality finish throughout the brickworks and its interfaces.

These responses are brief however articulate the general issues with the items in question. Please feel free to get in touch for a more detailed response. I look forward to continuing to provide comment on future proposals.

1.0 - Interface with Lane-Poole Place and development effects on Lane-Poole Place:

The current (and previous) strategies have consistently failed to articulate and/or provide any planning and development strategy for the interface between the Brickworks and Lane-Poole Place

The issues that still remain un-resolved for the interface with Lane-Poole Place are as follows:

1.1 - Proposed Future Land Uses of Kiln 3

The brickworks strategy recently noted the potential ‘redevelopment opportunity’ of Kiln 3. This provides for the demolition, sale and re-development of this site as opposed to the restoration of the more significant heritage elements within the Brickworks. The LDA has not provided any assurances as to the development restrictions on this sight to ensure any development is respectful of its surrounds.

This includes potential noise and privacy concerns for Lane-Poole Place residents and the impact of any development on the significant landmark chimney S3.

I note there has been no noise study conducted to ascertain either background noise levels at this interface or potential noise levels that can be expected from the redevelopment of these sites. This is a requirement in due diligence to provide certainty that any potential future development is in accordance with the draft noise management guidelines and that any necessary noise attenuation infrastructure is included in Estate Development Plans.

The importance of the chimney S3 as a landmark must also be taken into account with any future permitted development of this kiln. I note the LDA plans to make this a significant heritage element incorporating full time feature lighting of the structure and its promotion as a beacon for the development and the larger region. It will also serve as a historically significant structure.

Given these important considerations, any development of this site should not allow outdoor uses on the west of the Kiln 3 site and should be prohibited from being used as a restaurant or bar or other similar forms of entertainment to ensure the quiet enjoyment of the existing residents. There exists plenty of opportunity to re-develop sites within the brickworks whilst maintaining the amenity of the interfaces. Similarly, the height of any future development should be restricted to the height of the existing structure to ensure the development does not interfere with the importance of the chimney S3 and to maintain the existing building envelope for the site.

Recommendation 1:

Undertake a noise study to determine background levels at the interface to Lane-Poole Place and inform development constraints.

Recommendation 2:

Include amendments to the Yarralumla Precinct Code via the proposed Territory Plan Variation to explicitly prohibit the following uses for the Kiln 3 site:

- Shop
- residential use
- drink establishment
- restaurant
- club and
- commercial activity use

And further to restrict any development of this site to a maximum RL of the existing Kiln 3.

1.2 - Interface treatment between Lane-Poole Place and the Brickworks.

None of the Brickworks proposals have shown or taken into account the boundary treatment to be applied to Lane-Poole Place. In fact, most plans do not even show Lane-Poole place. Given the proposed uses for this area and the height difference between the Brickworks and Lane-Poole Place there is a requirement for a retaining/noise attenuation wall on the boundary of the site to clearly delineate the two sites, provide necessary noise attenuation and to avoid further erosion of this poor quality embankment.

This will also allow sensible cut off lighting to be used for the area to ensure light pollution does not affect the neighboring residents.

Consideration should also be given to the use of mature (>5m) trees in the proposed quarry park adjacent to Lane-Poole Place to provide immediate shielding for residents from noise, particularly from noise carried over the open space landscaping and pond.

Recommendation 3:

Provide interface treatments for Lane-Poole Place to ensure the most appropriate planning outcomes for residents and visitors to the Brickworks.

1.3 - Proposed Bentham St connection to the Brickworks

The current plan has included a new access road to the brickworks connecting to Bentham Street with on street parking provided to supposedly alleviate parking pressures around the local shops.

Firstly, given the age demographic of those users most likely to use the local shops (as opposed to facilities within the new development), these parking sites will not provide any significant advantage

due to the relative distance to the shops, the large longitudinal grade of Bentham Street and poor intersection design that does not cater for pedestrians.

Currently, the only users of Bentham Street west of Maxwell Street are Bentham Street residents, Lane-Poole Place residents and users of the Royal Canberra Golf Course. This site is not used by other residents and clearly shows the lack of appetite for these sites in relation to the shops given the current parking pressures have made no impact on the use of this area.

I note the traffic study undertaken by SMEC shows the proposed traffic from Lane-Poole Place as having approximately 140 VPH. Noting this area is unlikely to undergo significant increase in density due to the existing unit titles and the golf course being largely established, this number is clearly incorrect and hides the vast differential in traffic volumes that will occur east and west of the proposed road connection and the subsequent impact on residents of Lane-Poole Place and the golf course.

Of particular importance is maintaining the quiet and symbolic approach to these two important sites. As such, on street parking should not be permitted west of the proposed road connection (only towards the shops) and the stretch of road to the west of this area should be rehabilitated with mature trees to shape the top of the proposed quarry park.

I note the enormous increase in rat running through this new road connection in an attempt to beat queues onto Adelaide Avenue. This new road connection will unnecessarily add traffic to existing residential streets for the purpose of squeezing in as many dwellings as possible. This is poor design and reduces the overall amenity of the suburb.

Another issue is the current intersection arrangements at Bentham/Banks and Bentham/Hutchinson. The current arrangement is dangerous and has line of sight issues that contribute to the potential for accidents. The additional traffic from the brickworks would make this intersection even more dangerous and promote unacceptable risk taking.

Recommendation 4:

Remove all on street parking west of the proposed road connection to Bentham Street towards the Golf Course and provide adequate landscaping including mature trees to the west of this proposed road to add shape to the landscape and provide screening to the development.

Recommendation 5:

Remove proposed road connection.

2.0 - Staging of the Works

The current strategy has a proposed staging for the works. There are two issues with this staging proposal. These are the staging of the Adelaide Avenue bus stop works and the restoration of the brickworks.

The current proposal has the Adelaide Avenue bus stop being delivered in Stage 2 (6-8years). This is simply unacceptable given the severe lack of public transport options for Yarralumla and the distinct lack of rapid services to the town centers. These works must be completed as stage 1 works to

provide desperately needed services to the local area and provide an immediate transport option for residents. This also contributes to the ACT Governments emissions reduction targets and must be a feature of best practice infill design as this development supposedly prescribes to.

There should also be a bike and ride facility on the Yarralumla side of the bus stop in close proximity to increase and encourage the use of cycling within the development.

The current proposal also has the Brickworks remediation being undertaken as Stage 2 works. As this development is about the Brickworks remediation, this must occur in the Stage 1 works. There is already sufficient population to warrant the earliest delivery and this will become the focal point of the remediation, reuse and infill of the area.

Recommendation 6:

Provide the Adelaide Avenue Bus Stop in Stage 1

Recommendation 7:

Provide the Brickworks remediation in Stage 1

Recommendation 8:

Include a bike and ride on the Yarralumla side and in close proximity to the Adelaide Avenue bus stop.

3.0 – Road Network Design

The current proposal has a road network design not in keeping with the existing character of the suburb. This is clearly designed to maximize development yield. There should be a redesign of the internal road network to create a character similar to that of the existing suburb and in consideration of the existing terrain.

In particular, the road reserve should match that of the existing suburb regardless of current Territory requirements. This is a signature of Yarralumla and must be included in the current proposal. In addition, the current street trees proposed do not match those of the existing suburb and these should be replaced with street trees currently used in Yarralumla to provide a similarity and link to the existing suburb.

The proposed traffic generation also seems entirely too low for a development of this size and also the assumption of dwelling densities based upon existing numbers in the suburbs is incorrect. The current densities of population in the surrounding area is much lower than can be expected in this development given the lack of housing supply, increase in price and changing socio-economic values that all point to smaller homes with more people per household. These models should be independently assessed and a sensitivity analysis undertaken to ascertain the true extent of the traffic implications for realistic population densities.

There is also far too much development and traffic around the ceremonial approach to Government House. This important site should be unaffected by the proposed development and the existing road

network redesigned to keep a separate ceremonial entrance and remove proposed dwellings along this route.

Recommendation 9:

Redesign the road network to keep with the existing character and landscape restraints and reduce dwelling numbers accordingly.

Recommendation 10:

Undertake an independent traffic analysis that includes a sensitivity analysis for population numbers.

Recommendation 11:

Maintain the ceremonial approach to Government House as separate and independent of the Brickworks development

4.0 - Heights and Density

The proposed density of the current development is simply too high and is not in keeping with the character of the suburb. The proposed dwellings must be reduced to approximately half the proposed number to ensure a balance of redevelopment requirements and retaining amenity for existing residents. The proposal to double the population of Yarralumla is not an acceptable outcome for the suburb and the housing type is not suitable for the area.

There should also be a 3-story height limit for all developments on the Yarralumla side of Adelaide Avenue (excluding the 6 stories proposed along Adelaide Avenue). This will ensure a building envelope in keeping with the existing character of the suburb.

The current development simply puts profit over amenity and this site should not be subjected to the same treatment as greenfield sites and be in keeping with the character of its surrounds.

Recommendation 12:

Reduce housing density to approximately 800 dwellings

5.0 - Services

The servicing appears adequate however there appears no provision for NBN services. This should be incorporated in the development.

Recommendation 13:

Include provision for NBN Services

6.0 – Mixed Use Land Use

The proposed Mixed-use block is too small and should be the full size of the section (not half). This will ensure a self-sustaining commercial precinct can be created and maintained around the brickworks.

Reccomendation 14:

Include a larger mixed use block(s).

7.0 - Quarry Park.

I still maintain that the transformation of the old quarry into a pond is the lazy development option.

There is insufficient stormwater flow to maintain healthy base flow through the system and this will encourage the breeding of mosquitos and other pests. It is also an extra asset that the Territory will have to look after and the poor design will make this a costly item.

There is also no need for another artificial body of water given the proximity to Lake Burly Griffin.

This area is far more useful as a masterplanned park for use by the surrounding areas (without the pond).

The LDA must have another look at this area and re-design. This will be easier with the removal of the proposed road connection.

Reccomendation 15:

Redesign Quarry Park to remove the Pond.

Conclusion

There exists significant issues with the current proposal and the LDA should respond to these recommendations and provide a revised strategy that takes these into account.

Comments on the latest Brickworks Development Plan

Where is the off-road cycle path connecting the cycle path at the top of Novar St/Kintore Cres with the cycle path at the entrance to the Governor General's residence?

There currently exists an off-road dirt track which is used by cyclists, joggers, walkers to get from Yarralumla to the gates of the Governor General's. However, your latest plan seems to have wiped it out.

This addition to the cycle path network will be needed to cope with the approx. 3000 extra people in the suburb. Users will include the non-kamikaze commuters going to Woden and Civic, children going to school and recreational cyclists, joggers and walkers, including families. **In keeping with the existing network, it requires a dedicated space, preferably landscaped, separated from traffic.**

In a development of this size, the cycling infrastructure is as important as the car/bus/walking infrastructure *and needs to be in place **before** dwellings are built.*

One bonus is that this improvement to the cycling infrastructure will be welcomed by ALL residents, so you can use it to offset charges of "land grabbing".

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Mr David Dawes
Chief Executive
Land Development Authority
brickworks@act.gov.au

Dear Mr Dawes

SUBMISSION IN RESPONSE TO
CANBERRA BRICKWORKS AND ENVIRONS
PLANNING AND DEVELOPMENT STRATEGY 2015

YRA and ISCCC Submissions

With but a couple of minor exceptions we fully support these submissions.

Climate Change

As we are certain you would agree, clearly in the 21st Century all urban planning and indeed probably planning of anything anywhere in the world must be informed above all else by the need to mitigate or at least accommodate climate change.

The ACT government has made significant commitments in relation to climate change. Reducing green-house gas emissions by improving the city's energy efficiency especially in relation to transport is of great importance. Sooner or later the city must have an efficient public transport system and must be much more suited to cycling and walking. Urban infill, which is what the CB+E proposal is, obviously can contribute to this. However there seems to be nothing about the detail of the CB+E proposal which is informed by the climate change factor.

- Is it not the case that the proposed street orientation would make construction of good passive solar buildings more costly thus less likely?

- Would not the layout be very poor in terms of urban heat effects?
- Would not the layout and location of higher density dwellings more than 500 metres from public transport discourage active transport? In any case is it not illogical to build high density dwellings near the Adelaide Avenue corridor before it has a rapid transit system?
- Should not advantage be taken of the topography? The north facing slopes from the northern ridge to the brickworks and across Dudley Street seem ideal for north oriented terraced dwellings.
- Would not the embedded energy that might be saved by having a flat site be less than the energy used to shift tons of earth necessary?
- Should not as many of the trees in the area be retained to keep their carbon stored? The oaks seem to have quite a few decades of carbon fixing left in them. Many of the pines do not seem to be senescent. Those that are can be removed and new carbon fixing trees planted in their midst.

Need for plan for all land between inner Canberra and Woden and transport in and out and through the area

This proposal seems not to have been developed as part of a plan, including a transport plan, for the wider area of land between inner Canberra and Woden. If it has, what is the plan? ACTPLA and the NCA are responsible for this planning. We intend to ask both bodies what plans they might be making.

It makes no sense to work on the CB+E bit of land in isolation. Until a plan is developed for this whole area with full community participation, particularly involving the suburbs of Yarralumla, Deakin, Hughes and Curtin, nothing should happen in this area and especially no decisions should be taken to

- alienate open space
- clear fell woodland
- destroy habitat important in terms of certain biodiversity factors
- destroy topography and view lines

and no decisions should be taken that have significant implications for transport and the general amenity of the people living in surrounding suburbs.

If the CB+E proposal can be justified, and at its indicated scale and in its present form we certainly think it cannot, then there seem to be large areas of open space in the area as shown on the map below which are open to the same sort of treatment.

It is less justifiable to alienate any of the land in this area that is open to the public than it would be to resume Royal Canberra Golf Club land which is shut off from the public and for which we understand a virtual peppercorn rental is paid.



Recreational and general amenity

The recreational and general amenity of the community seems to have been paid scant regard. People living nearby and many further afield make great use of about a third of the CB+E site for active recreation including walking, running and cycling, especially because it links to the Dunrossil Drive corridor. The proposed plan is completely inconsistent with this.

Generations of children have benefitted from the self-directed, adventure character of recreation involved in exploring the informal woodland. The proposed formal parks would end this.

The trees of Westridge that would be bulldozed give protection from prevailing winds and otherwise contribute to wellbeing. (There is good research showing a causal relationship between treed environment and wellbeing.)

Ecology

The YRA submission makes strong arguments about certain species. We would just add that although the tree species are exotic they do provide habitat for a number of native bird species.

Acceptable Development

It is our very strong view that if the development were to

- leave the land shaded green on the map below untouched
- be more in harmony with the existing dwellings in terms of building character
- involve heritage sympathetic development of the brickworks site itself
- involve buildings of no more than two storeys generally
- allow up to five storey apartments adjacent to Adelaide Avenue, but only after a rapid transit system is completed
- be limited to dwellings for no more than 1000 people, and
- be designed to prevent rat-running through existing suburban streets and not otherwise exacerbate transport to and from and through all four surrounding suburbs

there would be general community acceptance. This would of course mean that the several approval stages the plan would still be required to pass would be likely to involve much reduced opposition.



Adelaide Avenue Cotter Road junction

Of significance in terms of expenditure it seems to us that a development in accordance with these conditions would not require the construction of the proposed diamond junction between Cotter Road and Adelaide Avenue. Such a junction would be likely to create more transport problems than it solves in terms of traffic rat-running through Deakin and beyond.

We do not see that it is necessary for traffic to turn south on Adelaide Avenue from the Cotter Road. It is shorter to drive from Molonglo to Philip by the Tuggeranong Parkway.

While we are not traffic engineers it seems to us that the junction problem could be simply solved as per the plan below. This would allow the elimination of Dudley St.



The distance between the feed on and off ramps on the north side of Adelaide Avenue would be greater than that between the on and off ramps in the junction between Parkes Way and Commonwealth Avenue as shown in the next map.



We look forward to seeing a reworking of the CB+E plan which fully accommodates the points we raise and those raised in submissions from the YRA and the ISCC.

Yours sincerely

[Redacted signature]

[Redacted name]

4 April 2015