

THE LAND DEVELOPMENT AGENCY
The Canberra Brickworks + Environs Planning
And Development Strategy – The Strategy 2015

27 March 2015



Re: Yarralumla Brickworks Development (CB+E Masterplan) – Woolls Street Concerns

Dear Sir/Madam

We refer to the Yarralumla Brickworks CB+E Masterplan as presented at the Community consultation session held at the Yarralumla Primary School on Saturday 28th February 2015.

It is acknowledged that the Land Development Agency (LDA) has revised its Masterplan for the Yarralumla Brickworks Precinct in order to address some of the previous concerns of the Yarralumla Residents.

Notwithstanding the revised layout there are still a number of concerns which need addressing. These concerns are traffic related and are summarised as follows:

- i. Traffic generation. The traffic generation associated with the proposed development, based on the current density of 1,800 dwellings,
- ii. Traffic distribution. How is the traffic from the new development going to be distributed and integrated into the existing Yarralumla street network, and
- iii. Safety. The effect the increased traffic flows will have on the existing street network from an amenity and safety perspective.

Of particular concern is the proposed street connections, in the form of “cross-streets”, at Woolls Street and Abbott Streets. See current Masterplan, attached.

The SMEC Traffic Report, which supports the Yarralumla Brickworks development, shows Woolls Street will become a major thoroughfare during the development and on completion of the Brickworks. This is a major safety concern for the residents along Woolls Street.

The following points are noted in regards to Woolls Street:

- No modelling for Woolls Street for the “2021 Do Nothing” Option has been undertaken, however there are 15 residential properties located along Woolls Street and according to the updated RMS GTGD rates (generation rate of 0.71 / dwelling), this would equate to approximately 11 vehicle trips per hour during the AM peak based on existing street traffic.
- The width of Woolls Street is approximately 6.1 m.
- Woolls Street has a 90 degree turn along the length of the street. See Photos 1 & 2

- The SMEC Traffic Report for the “2021 AM CB+E Masterplan - (Stage 1)” correctly or incorrectly indicates that there will be approximately 264 vehicle trips during the AM peak. If correct, this represents an increase of approximately 24 times the existing volume of traffic on the street.


- Based on the preceding dot point this means that when vehicles are parked adjacent to the kerbs in Woolls Street (See Photo 3), there would be approximately 264 vehicles during peak hours on Woolls Street in 2021, trying to navigate around the stationary cars. This is clearly an unsafe and an unacceptable outcome for the residents of Woolls Street.
- It is noted that 264 vehicles per hour during peak hour would equate to approximately 2,640 vehicles per day, which would require Woolls Street to be widened to 10m (min) if it were to be made compliant with the current "Estate Development Code". It is understood that this minimum width of 10m may actually be increased to 11m by TAMS based on a recent ruling in a new estate in Gungahlin.

The proposed "cross-streets" connection at existing Woolls Street cannot be supported as Woolls Street is only 6.1m wide. An increase in traffic flows along this street from the proposed Brickworks Development would present serious safety issues. Furthermore, widening Woolls Street to meet the current "Estate Development Code" requirements would see the removal of the existing trees along both verges of Woolls Street. This is also an unacceptable outcome.

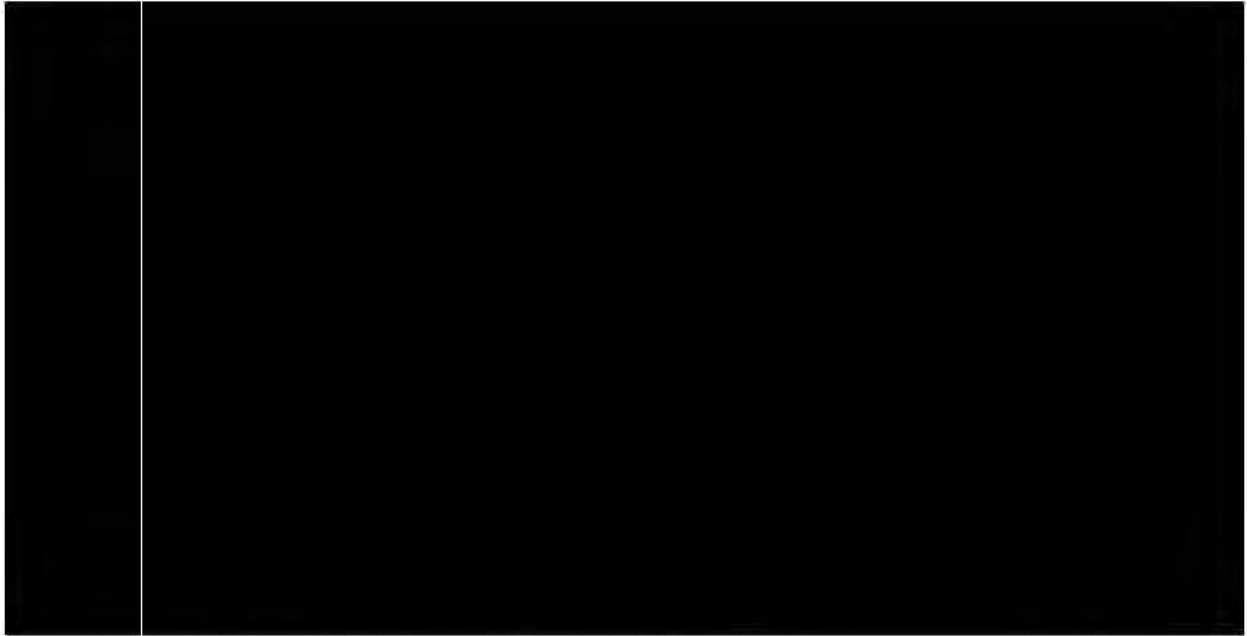
We are of the strong view that there should no street connections from the proposed Brickworks Development to the existing streets off Denman Street.

Moreover, we are of the view that existing Woolls Street should be converted into a "no through" street via the construction of a Cul-de-Sac as shown on the attached Sketch Plan #1. It is noted that preliminary investigations have indicated that a Cul-de-Sac at the Denman Street end can be accommodated at the end of Woolls Street.

The proposed Cul-de-Sac at the end of Woolls Street will address the safety concerns for those residents located along Woolls Street.

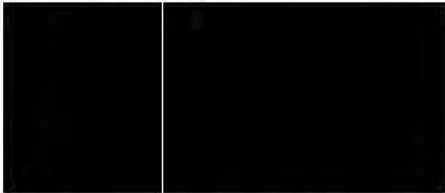
This letter is supported by 

Street Number	Owner/Residents – Woolls Street	Signature(s)
		



The abovementioned owners/residents would be more than happy to convene a meeting with the LDA and its Design Agents to further discuss our concerns, as noted above, associated with the Yarralumla Brickworks Development.

Yours Faithfully



Enclosed: Existing Masterplan
Photo 1, Photo 2 and Photo 3
Sketch Plan #1: Cul-de-Sac

cc: Y.R.A.



**CROSS CONNECTIONS
NOT SUPPORTED DUE
TO SAFETY &
TRAFFIC CONCERNS**

Royal Canberra Golf Course

Dunsen Drive

Yarralumla Shops

Yarralumla

Weston Street

Novar Street

Kent Street

Bentham Street

Quarry Park

Brickworks

Maxwell Street

Dunsen Street

Albert Street

Marking Church

Indy Street

Dunsen Street

Kent Street

North Terrace

Maxwell Street

Maxwell Street

Maxwell Street

Maxwell Street

Maxwell Street

Maxwell Street

Maxwell Street

Maxwell Street

0 50 100 200m

Scale is Approximate





Photo 1

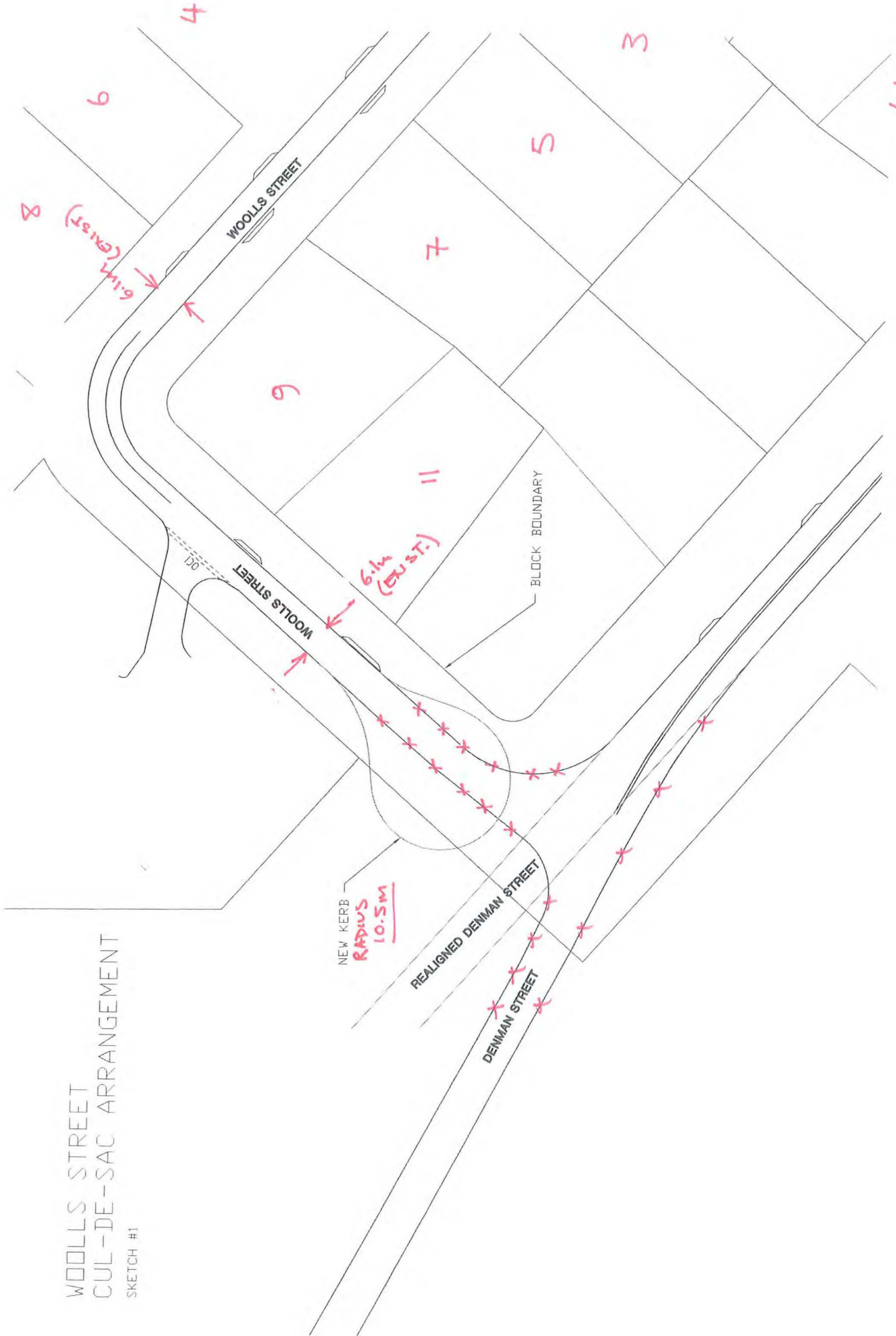
Photo 2

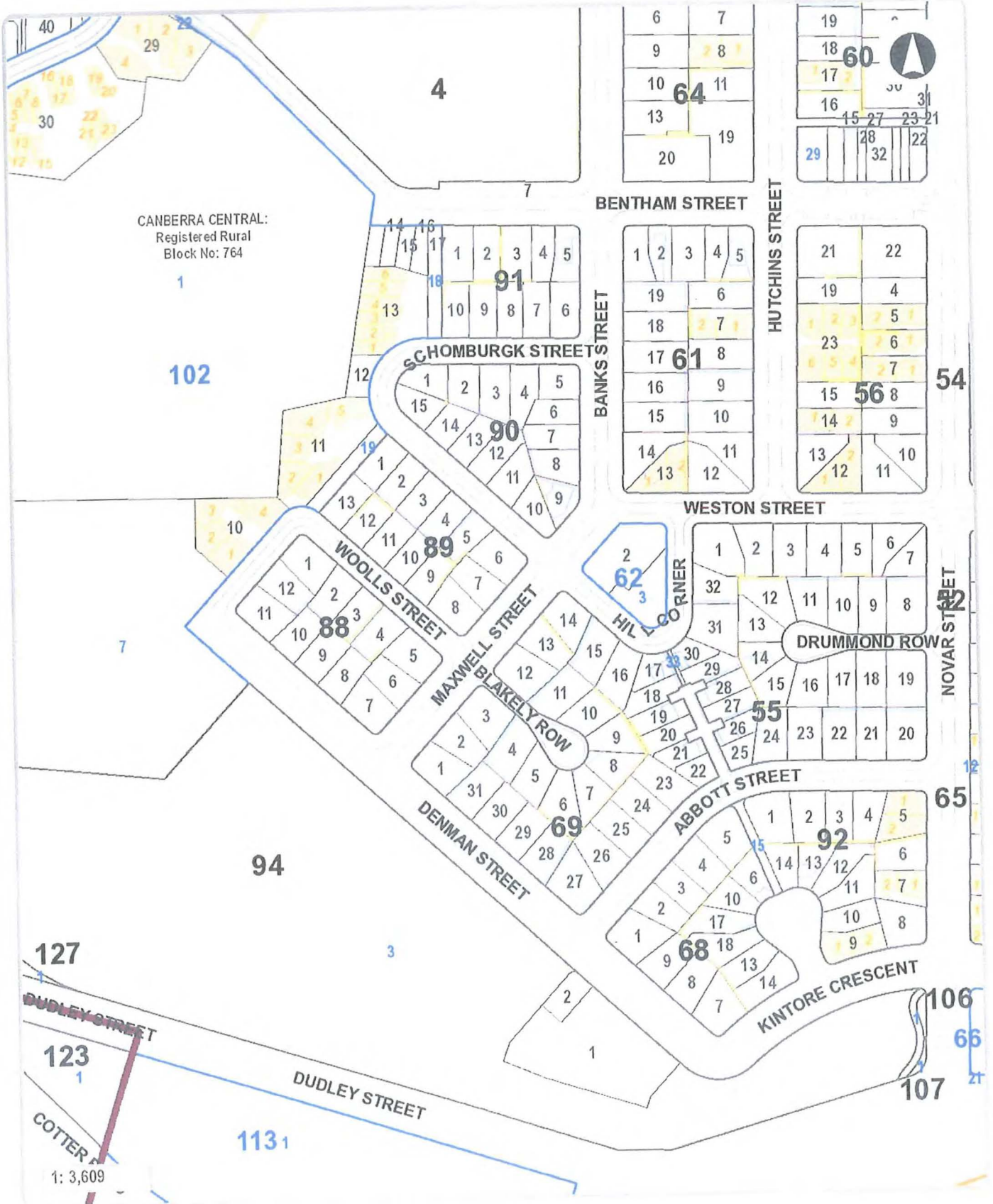




Photo 3

WOOLLS STREET
CUL-DE-SAC ARRANGEMENT
SKETCH #1





Proposed development of Yarralumla Brickworks and Environs
Comments in regard to “traffic & transport” and “Community needs”
assessments.

- Local shopping centres are designed to accommodate between 3000 – 10000 residents. Yarralumla currently has population of 3300 and with the completed works is expected to increase to 6000. Therefore 1 local shopping centre is sufficient for the suburb. Adding extra retail will not be viable for the existing shops or for any new ones.
- The development of higher density housing In other suburbs does include some commercial on the ground floor mostly including commercial offices, cafes or community services, NOT SUPERMRKETS.
- Suburbs used as benchmarks – Bruce population of 8000, Watson population 7000 and Lyneham population 5000. None of these suburbs have more than 1 shopping centre so why should Yarralumla or Deakin (Population 2783)? Both these suburbs are in close proximity to Hughes (population 2956), which also has a local shopping centre.
- As stated in your report (Canberra Brickworks and Environs Community needs assessment page 22) “all of the above supermarkets are located in a way to capture passing trade, Cutting access to Yarralumla via Dudley Street may reduce “passing trade” unless a supermarket the size of the current Yarralumla IGA or larger is included as part of the new development!” I have never heard of anything more ridiculous! I understand this as; let’s destroy the current local Yarralumla shopping centre by cutting off access and building a new IGA of the same size or larger. You must be aware that without a supermarket in a local shopping centre the whole shopping centre doesn’t survive. All local shopping centres have easy access, why should access to Yarralumla shopping centre be made so difficult, therefore impossible to pick up passing trade.
- The plan suggests building a shopping centre within the main access point from Cotter Road as it will be too difficult to get to the existing one.
- I know there is a problem with parking around the Yarralumla an Deakin shopping centres, I do however believe that once the park and ride facility in Deakin West is operation this will solve some of the issue, as a number of people park at or near their local shops and then catch the bus to work.
- You also need to be aware that another IGA in such close proximity the 3 existing IGA’s would not be allowed, therefore you are opening the door for a Coles, Woolworths, Aldi or large chain to open a supermarket in the new development. You must be aware that large chains no longer seem to be limited to town centres or group centres as was in Canberra’s original plan. No extra retail such as supermarkets should be included or allowed in the new development. The ratio of population (even after the development) with the existing local shopping centres is well within the benchmark.

- Research on current Canberra Suburbs shows population of the suburb v local shopping centres in suburb

Suburb	Population	Shopping Centres
Ainslie	5100	1
O'Connor	5251	1
Kambah	15400	2
Ngunnawal	10600	1
Wanniassa	7850	1
Kaleen	7313	2
(Services other areas)		
Dunlop	7800	1
Nicholls	7000	1
Narrabandah	6000	1
Evatt	5400	1
Griffith	4250	1

This proves a suburb with 6000 population (Yarralumla) or a suburb of population 2783 (Deakin) does not require more than 1 local shopping centre.

They all have a group centre not too far away like we have Curtin.

- The closure of the access to Nova/Kent Streets from Cotter Road via Dudley Street will cause a large increase in traffic through the streets of Yarralumla. That route to Yarralumla Shops is used by a large number of cars and large delivery trucks every day. You suggest they travel the extra distance along Cotter Road, to Denison Street and then onto Nova Street, go through 3 sets of traffic lights to get to Bentham Street. I believe it will be much quicker and easier to from Cotter Road to Brickworks Road and then through the streets of Yarralumla to get to the shops. This is what the residents of Yarralumla do not want, more traffic through the streets. Dudley Street should be left as it is for the good of the residents and Yarralumla Shopping Centre.
- Looking at the table "Transport and infrastructure Assessment 17/2/2015, page 31." AM peak average, Cotter Road to Adelaide Ave via Dudley St EB, currently distance is 2,100m, average speed is 46.9kmh, average time is 2 min 41 sec. After the completion of the works it reads:- distance 2,300m, average speed 13.7kmh, average time 10 min 19 sec. Another reason why Cotter Road to Dudley Street access should not be closed.
- Yarralumla is an old suburb with beautiful character. Development of the Brickworks sight needs to progress with preservation of its characteristics. I don't think the residents would like to lose their local shopping centre and be required to go out of suburb for essentials like supermarket, chemist, post office, dry cleaning, hairdresser etc. If retail were to go in the brickworks precinct or in Deakin West it should be limited to retail which compliments current retail, not oppose it.

This is a brief summary on my concerns with the proposed plan.



24 March 2015

Land Development Agency: brickworks@act.gov.au
 Members for Molonglo:
Barr@act.gov.au; corbell@act.gov.au; rattenbury@parliament.act.gov.au;
hanson@parliament.act.gov.au; doszpot@parliament.act.gov.au; jones@parliament.act.gov.au;
fitzharris@parliament.act.gov.au
 cc: Yarralumla Residents Association: info@yarralumlaresidents.org.au

Revised Brickworks and Environs Development Strategy

Objection summary

I am a resident of Yarralumla with a young family and object to the housing development in the woodland area near the Canberra Brickworks. The woodland area is a family recreational area.

The revised brickworks strategy is unacceptable because it proposes excessive and badly planned housing and roads development that undermines the 'liveability' of my suburb. Residents want:

- Retention of the woodland walking trails between Denman St and Dunrossil Dr;
- Reduction in housing density and a design in character with the suburb;
- Prevention of traffic congestion, bottlenecks and parking problems;
- Protection of a critically endangered species – the Golden Sun Moth; and
- Adaptive reuse of the brickworks at the core of any plan.

Farcical community engagement

Objections have been raised by the Yarralumla residential and business community to medium density development, traffic congestion and loss of open space in the brickworks area since 1979. Despite opposition to excessive housing articulated over the past 36 years and a petition with over 4,000 signatures, the LDA has made a farce of community engagement by proposing even more dwellings:

2010 Proposal	2014 Proposal	2015 Proposal
No. dwellings: 900-1,100	No. dwellings: 1,600 on 42 ha	No. dwellings: 1,800 on 49 ha
Max.height: 4 storeys	Max. height: 8 storeys	Max. height: 8 storeys
*Popn increase: 1,870	Popn increase: 2,720	Popn increase: 3,060

*(Population increase based on number of dwellings and estimated average occupancy of 1.7 people per dwelling)

Adverse impact on community

This development is excessive in scale because it will:

- Add 3,000+ residents, more than doubling the existing population of the suburb;
- Bring 1,800 cars into the suburb causing traffic congestion, bottlenecks and commuter delays;
- Overwhelm parking capacity at the small local shopping centre;
- Remove a beautiful woodland area with abundant birdlife and community walking trails; and
- Threaten a critically endangered species with localised extinction by destroying its habitat.

Loss of valued woodland walking trails

The woodland area near the brickworks is a tranquil site of local beauty. This is a semi-wild area where dappled light filters through tall shady trees. Native birdlife abounds. In this wooded and grassland area children explore and families cycle along bush tracks to the lake. Residents use this area to exercise, walk dogs and meet neighbours. Numerous public meetings and the petition confirm the community places high value on this natural area. A manufactured 'urban park' is no compensation for the loss of bushland.

Localised extinction of Golden Sun Moth

A prime reason justifying conservation over housing development in this area is the Golden Sun Moth. The GSM is listed as critically endangered under the *Environment Protection and Biodiversity Conservation Act 1999*. It is critically endangered because it has undergone a significant reduction in its grassland habitat. This grassland area between Dudley Street, Denman St and the brickworks has been identified as significant GSM habitat in environmental surveys:

“The grassed area adjacent to Dudley Street and extending through to Denman Street has been identified as having significant ecological value in the Canberra context.”(1)

“The very large GSM population (up to 685 individuals) at Dudley Street is highly significant for the ACT.” (2)

Flattening and bulldozing a significant ACT Golden Sun Moth habitat to make way for roads, drains and multi-storey apartment blocks is recklessly irresponsible. This development threatens an already critically endangered species with localised extinction. How can the Greens condone this?

A “monstrosity of a scheme” that will “have seriously adverse impacts on your quality of life”

After years of investigation, multiple studies and countless hours of work on the brickworks and environs, all at enormous expense to Canberra ratepayers, it must be clear this development is wrong. Urban infill can enhance a garden city, but not by cramming as many people as possible, into as small a space as possible, wherever possible and without regard to the social impact. Traffic congestion already occurs with cars from Woden and Weston Creek converging near Yarralumla, so adding more housing at this bottleneck point will exacerbate commuter traffic problems.

Tony Powell, former Commissioner of the National Capital Development Commission recently said this of the housing strategy for the brickworks area in Yarralumla:

“I had reason last week to run my practised eye over the Land Development Agency's Canberra Brickworks and Environs Strategy. It didn't take long to conclude that, from a town planning, urban design and social and environmental standpoint, it is a “monstrosity” of a scheme. It is a throwback to the kind of subdivision layouts that cheap developers favoured prior to the introduction of statutory zoning in the mid-20th century, commonly known as “slicing and dicing” within an encompassing gridiron pattern of principal streets, the aim of which was to produce as many narrow-fronted allotments and dwelling units as possible in order to minimise development costs and maximise profits.

This latest strategic plan bears no resemblance to any aspect of existing Yarralumla and the accompanying consultant reports have been interpreted in such a way as to justify its inept layout, rather than aiming to produce a built environment that is reflective to some degree of what already exists.

The residents of Yarralumla had better take notice of this proposed development, as it will progressively have seriously adverse impacts on your quality of life.”(3)

Mr Powell’s assessment is alarming and coming from an independent planning expert, must be given weight over lobbying from groups motivated by financial self-interest.

An alternative solution

Effective community engagement means acting on residents' concerns by:

- Scaling back housing density to mitigate the adverse impact on Yarralumla and traffic;
- Retaining the valued woodland walking trails to Dunrossil Drive; and
- Conserving existing GSM grassland habitat.

How can this be done? Preferably, the whole project should be cancelled.

Alternatively, moving most or all of the planned housing a short distance across the Cotter Road to the adjacent horse paddocks area is feasible. The horse paddocks are infrequently used, ecologically less significant, but still central and spacious.

Spreading or sharing the development gives urban planners capacity to avoid traffic congestion, create housing diversity, retain woodland walking trails and conserve habitat. Shifting housing from the brickworks area preserves the ceremonial entrance of Dunrossil Drive to Government House, while still funding a regeneration of the brickworks. The brickworks could become a vibrant place for residents, the Canberra community and visitors.

Reducing the impact on any one suburb can still achieve urban infill aims. Shifting the housing development across the Cotter Road to the horse paddocks is a compromise and an opportunity.

Quality of life – liveability

The constituents and ratepayers of the ACT elect and give responsibility to members of the Legislative Assembly to represent and act in their best interests. In addition to public comments the decision-maker, whether that is the planning authority or the minister, considers a range of matters including the objectives of the zone, the suitability of the land where the development is proposed, advice from entities and the probable impact of the proposed development. For all these reasons it should and hopefully will, be determined that the housing development in the brickworks vicinity is misplaced and inappropriate.

If the ACT Government can move the Elementus solar farm from Uriarra village after opposition by residents, then it should also heed the 4,000+ petition regarding housing at the brickworks. Disregarding the concerns of thousands of residents will be poorly received by the electorate.

Last year a Property Council of Australia survey and an OECD report (4) found Canberra to be Australia's most liveable city. Canberra did not achieve this outstanding result by construction of excessive, ugly, multi-storey apartment blocks with accompanying congestion, bottlenecks, removal of green spaces and habitat destruction. All of which will occur if this fundamentally flawed and discredited housing development is allowed to proceed. It will make us a less liveable city.

The petition calling for the Brickworks and Environs development plans to be reworked and scaled back received overwhelming public support. The desire, if not right, of residents to maintain, enjoy and enhance the liveability of their urban environment must be the paramount principle.



Golden Sun Moth habitat - shaded in purple (5)



Prepared by Hill Thalis Architecture + Urban Projects with Jane Irwin Landscape Architecture for the Land Development Agency - September 2013

iv) Site Interface

The study area of the Canberra Brickworks and Environs has a complex boundary of built and open edges, both of which are defined by the following:

- Buildings fronting the street reinforce the Brickworks boundary along Denman Street. The built edge diminishes as it progresses north.
- Backyards and blank fences define the built edge of properties located on the east and north of the site.
- Southern boundaries of the Brickworks are defined by the vegetation that separates the site from the Cotter Road.

Apartment blocks to be imposed on community green space, woodland and GSM habitat (6)

Woodland and grassland area near brickworks



Community use of woodland walking trail near brickworks



Golden Sun Moth



Sources:

(1) Yarralumla Brickworks & Environs Planning Review - Susan Conroy & Munns Sly Architects March 2005, p36; http://www.actpla.act.gov.au/_data/assets/pdf_file/0018/2826/BrickworksReview.pdf

(2) Report on Community Monitoring of Golden Sun Moths in the Australian Capital Territory (ACT), November 2009 (assisted by FoG) p31; <http://www.fog.org.au/advocacy.htm#submissions>

(3) Tony Powell: Canberra Brickworks and Environs Strategy: Dicing with disaster 11 March 2015
<http://www.canberratimes.com.au/comment/ct-letters/canberra-brickworks-and-environs-strategy-dicing-with-disaster-20150311-141ds2.html>

(4) <https://www.propertyoz.com.au/Article/NewsDetail.aspx?p=16&id=9036>;
<http://www.canberratimes.com.au/act-news/canberra-named-the-best-place-in-the-worldagain-20141006-10r5sp.html>

(5) Canberra Brickworks and Environs Planning and Development Strategy 2013 p21
http://www.lda.act.gov.au/uploads/ckfinder/files/pdf/3_Commercial/Canberra_Brickworks/Canberra%20Brickworks%20and%20Environs%20Planning%20Strategy%202013.pdf

(6) Canberra Brickworks + Environs Planning and Development Strategy (2015)
<http://www.lda.act.gov.au/canberra/planning-and-development-strategy>