



Mr David Dawes
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Land Development Authority

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Dear Mr Dawes

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

The Inner South Canberra Community Council (ISCCC) appreciates the opportunity to comment on the *Canberra Brickworks and Environs Planning and Development Strategy 2015*.

We acknowledge the significant efforts that have been made by the Land Development Agency (LDA) to inform the community about this latest version of the strategy. This includes the public information session held at Yarralumla on 28 February 2015 and the individual briefings that have been provided to the office-bearers of local community groups, including the ISCCC, Yarralumla Residents Association (YRA) and the Deakin Residents Association (DRA).

However, although significant changes have been made since 2014 in response to community feedback, we are unable to support the revised version in its current form. In our view it is the wrong development on the wrong site. It does not sufficiently respect local environmental and heritage and national capital values.

Local considerations

The ISCCC fully supports the submissions made on the Strategy by its constituent members, the YRA and the DRA, and wishes to highlight some of the key points made therein.

We also note that a public meeting sponsored by the YRA on 15 March 2015 called for:

- a rethink of the urban design to ensure something more in character with the suburb, and address impacts on highly valued urban open space;
- reduction in the density of the development;
- more government action to address the development's impacts on traffic, existing street networks and parking in Yarralumla and surrounding suburbs;
- ensuring that adaptive reuse of the Brickworks is at the core of any plan;
- retention of highly used walking trails/continuous walking loop; and,
- connectivity between natural parklands rather than isolated formal parks.

- *Policy and principles*

The ISCCC would welcome a comprehensive statement of policy and principles for this particular development. A one sentence response in the statement of consistency with the nine strategies outlined in the ACT Planning Strategy is insufficient in that it does not provide any guidance about what the development should achieve other than maximising sales revenue. There is no indication of desired demographics such as public and community housing, ageing in place (single storey), affordable housing and so on.

- *Density and population*

The proposed scope of this development is disappointing. As proposed it effectively removes any connection with the existing suburb of Yarralumla by creating a very different look and feel that is more akin to a town centre without any town centre facilities. The Yarralumla and Deakin shopping centres are not within a comfortable walking distance and are already over utilised in terms of parking availability. Residents will be required to drive to town centres and for the foreseeable future most car drivers will not use public transport for other than commuting to work. The proposed number of residents is excessive in this small area adjacent to a very old Canberra suburb.

- *Landscape*

The proposed cut and fill, removal of old and large trees, and the removal of long and well-used walking tracks is contrary to sustainable planning principles. For example, Yarralumla residents consider the established walking trails are a valuable asset and these could well be a sensitive and interesting element of the development strategy, and the removal of many of the trees must be reconsidered in the context of soil stability, vista and national capital requirements. There is some consolation in that this area will need to be referred for consideration under the under the [Environment Protection and Biodiversity Conservation Act](#).

While the proposal to cut and fill the area can be understood on the grounds of maximising revenue, it also constitutes poor practice with respect to urban sensitive water management, retention of the landscape context of the area and a reduction in the ability to design something other than the 'stock standard'.

- *Local Traffic*

While there has been some improvement in the proposed traffic arrangements, these will need to be very carefully monitored over time and consideration must be given now to the possibility of future remodelling.

The ISCCC understands that infill along transport routes is intended to encourage residents to use public transport. However, given the development time frame, most residents of this development are likely to be car dependent and this could add significant volumes to streets that are designed for a different modal mix. We also question the transport utility of an 'Adelaide avenue/Yarra Glen Rapid Transit Corridor'. While it opens up the prospect of population increase in urban development adjacent to the corridor, it will do nothing to increase patronage of public transport except around the system's necessarily widely-spaced stops/stations (ie 2 km apart, if the future system is not to be a lot less rapid than current trunk line bus services).

The ISCCC considers the proposed Adelaide Avenue bus facility will prove to be difficult to access and the impact on traffic volumes through neighbouring inner south suburbs will also need to be carefully monitored to avoid 'rat running' (discussed further below). Also, until such time as there are better on road cycling facilities in the inner south, any extra traffic is likely to result in unsafe driving conditions. Inner south Canberra roads are generally single lane, winding and lack traffic management devices.

We note that the LDA seeks to overcome this difficulty by having the corridor zoning provisions in Yarralumla altered from RZ2 to RZ5 on the grounds that Adelaide Avenue/Yarra Glen freeway is a 'Rapid Transit Corridor' and, by implication, that this justifies high density residential development in the manner that the Strategy intends.

However, the term 'Rapid Transit Corridor' is simply an aspirational phrase, it cannot become a statutory instrument until such time as the so-called corridor is transformed into the requisite zoning in the Territory Plan. The implications of such change to the Territory Plan would be enormous and would allow for a rash of spot rezoning of residential, commercial and utilities land to a much higher density than currently exists, in a 2km wide corridor stretching, in this case, from State Circle to the outskirts of the Woden Town centre including the suburbs of Yarralumla, Curtin, Lyons, Deakin, Hughes and Garran.

Inter-city Traffic Issues

The ISCCC is becoming increasingly concerned at the sustained increase in traffic volumes being experienced in the inner south, to the detriment of local residents and businesses, and the broader Canberra and regional community. Traffic from new population and industrial centres, such as Molonglo, has, under current arrangements, no alternative but to use routes through and adjacent to the inner south, and 'rat-running' to avoid traffic delays on the major arterial thoroughfares' is commonplace.

We acknowledge that the 2015 strategy reinstates the proposed construction of the proposed Cotter Road extension into Deakin to remove some traffic from the new Yarralumla residential development. However, this will likely expose Deakin, Forrest, Barton, Griffith and the central national area to extensive 'rat running', including car movements emanating from a portion of the expected 55,000 Molonglo residents 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 does not seem reasonable for an extended Cotter Road to dump cars onto the Denison Street, Strickland Street, Stonehaven Crescent network amidst the slow-moving traffic that circulates throughout the health and medical precinct centred on Calvary John James Hospital. The installation of more traffic lights generally in this area hardly seems to be an adequate engineering response.

We support calls in other submissions for a comprehensive traffic survey, with peer-reviewed modelling, of the existing suburb of Yarralumla and adjacent suburbs to assess future traffic flows and impacts. This should include the transport route from the Cotter Road to the City and Parliamentary Triangle.

Canberra as the nation's capital

In its submission to the 2014 *Canberra Brickworks and Environs Planning and Development Strategy*, the ISCCC raised a number of concerns about National Capital aspects of the development. Most of these appear not to have been addressed in the 2015 strategy, including those relating to the National Capital Open Space System, ridges and buffers, and vistas and views.

We repeat here our reproduction in our 2014 submission of a statement which is a concise and accurate statement of our conception of what Canberra is and should remain.

Canberra is more accurately described as a 'City in Harmony with Nature, where the natural elements such as the hills and rivers are a very powerful part of the image of the city. The naturalistic garb of the hills, their proximity to the developed areas, and their almost constant presence on the horizon from anywhere in the city, are unique attributes.....Apart from some areas to the east, the hills form a

backdrop in all ground-level views. Their presence is more dramatic in the older areas of Canberra, where Griffin carefully aligned major roads so that the hills formed termini to vistas. In most areas, their presence is more powerful because of the absence of vertical man-made elements in the foreground....

(Draft Urban Design Issues paper, Interim Territory Planning Authority, 1990)

The strategy involves the alienation of extensive areas of public open space, some of which impinges on the National Capital Open Space System, contrary to undertakings given by the ACT Government following its wide-ranging review of all public open space in the aftermath of self-government.

The revised design in no way addresses our previously-expressed concerns that the views of the distant hills looking south/southwest from Yarralumla ridge would disappear. The land south and south east of the brickworks was designated by the 1992 ACT Territory Plan for restricted recreation access and an important visual landscape buffer zone terminating the northern boundary of Woden, when viewed from along Yarra Glen. We submit that development on the scale proposed will substantially and irreparably compromise this important buffer zone.

Canberra was created as Australia's capital city. From the beginning, the nation had the expectation that this place would somehow be special, a show place of which we could all be proud, with planning and environmental values equal to or better than other planned cities anywhere in the world.

This very special part of Canberra proposed for development in the context of the brickworks proposal has survived for more than a century since the founding of the city in 1913. The oft-repeated view that there would be a very high demand for residential apartments on the site surely misses the point. There would no doubt be popular interest in residential living on the sites currently occupied by the Hotel Kurrajong or West Block but that is not in itself a reason to despoil the heritage values of those sites.

The ISCCC expects that the National Capital Authority will make a submission and argue the case for the proposals to meet national capital requirements. From the ISCCC's perspective the important elements include the retention of the existing land contours, the changes to the ceremonial access to the Governor-General's residence and the retention of the buffer which constitutes the buffer in the vista from Woden.

Territory Budget Issues

It has become increasingly clear that the LDA's land development strategy is very substantially and necessarily based on the ACT Government's revenue requirements. It is accepted wisdom that a sustained level of land sales is necessary to make up for chronic imbalance in the ACT budget resulting from

the limited local tax base. As we stated in our submission in response to the 2014 strategy, 'We are disappointed that financial considerations appear to be driving the scale and shape of this development, to the detriment of the national capital values which have served Canberra so well for many decades.'

This long-term budgetary imbalance, which is forcing retrograde planning outcomes onto the community must be addressed by the ACT Government in conjunction with the Commonwealth.

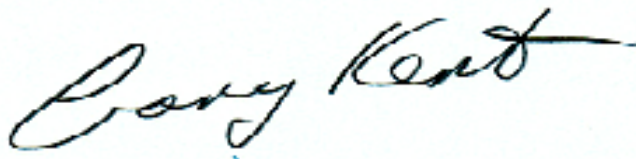
Conclusion

The ISCCC submits that:

- the residential development needs to be significantly scaled back and revised to present a look and feel that is compatible with the neighbouring Yarralumla and Deakin suburbs;
- the proposed development should articulate a modern, liveable and sustainable suburb, rather than an initiative clearly designed to maximise revenues;
- traffic and transport design and management issues associated with the development need to be re-assessed, taking into account local, inner south and regional implications;
- the ACT Government should urgently review the Territory's financial arrangements with a view to reducing its dependence on land sales, leading to inappropriate and short term planning and development imperatives; and,
- fully consider and reflect in the strategy the vital national capital and environmental values of this precinct.

We would be happy to discuss this submission with you or your officers.

Yours sincerely

A handwritten signature in black ink that reads "Gary Kent". The signature is written in a cursive, flowing style.

Gary Kent
Chair
4 April 2015