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### **Canberra Brickworks and Environs Planning and Development Strategy**

The Land Development Agency (the LDA) has invited the community to have their say on the proposed *Canberra Brickworks and Environs Planning and Development Strategy*.

I am providing this submission on behalf of the Deakin Residents' Association Inc (the DRA).

We express our appreciation for the opportunity to attend the Project Reference Group meeting on 27 May 2014, and also the community open day held on-site on Saturday 31 May 2014. These events have helped to shape the views of our community with respect to the proposed strategy.

We understand from the LDA website that, after the current consultation process is completed, there will be further opportunities for the community to have a say as part of the formal public consultation associated with the relevant statutory processes. This includes the draft variation to the Territory Plan, amendment to the National Capital Plan, referral under the Environment Protection and Biodiversity Conservation Act 1999, and Environmental Impact Statement under the Planning and Development Act 2005.

It would be futile for these later processes to be undertaken until there is significant agreement on the key elements of the strategy.

Such agreement does not exist.

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<sup>1</sup> This image is from the artwork *Alfred Deakin, A Life in Three Phases* by Martin Moore which is located at the Deakin Local Shops, and is used with the agreement of the sculptor and the ACT Government.

The strategy applies to a unique site, with both ACT and Commonwealth Government interests, at a location significant to much of Canberra, with heritage elements, and adjacent to some of the most historic suburbs in Canberra.

There are a very broad range of concerns, and in our submission we concentrate on the issues which are of primary significance to the Deakin community, but also touch on issues of concern to the broader community, with which we agree.

We believe that there should be no further action on the estate development plan component of the proposal (that is, the element related to residential housing units – and including on the Deakin side 15,000 square metres of commercial space) until the following projects have been undertaken:

- A transport planning study which addresses the relationship of the proposal to the transport and traffic needs of the broader Inner South, including the developing Molonglo suburbs
- A comprehensive business plan for the brickworks site itself
- A comprehensive site analysis, to address design and siting issues for future development
- Effective consultation by LDA with both the ACT Planning and Land Authority (as the key planning agency representing the ACT community) and the National Capital Authority (similarly, the key planning agency representing the Commonwealth interest).

These should be collaborative with open, transparent, and meaningful involvement of the community.

Preliminary community engagement has clearly indicated that an effective development proposal will have to include:

- Implementation of a traffic interchange at the Cotter Road/Adelaide Avenue intersection to cope with greatly increased east-west vehicle traffic, and an express service bus stop on Adelaide Avenue (at the Kent/Novar Street overpass)
- Implementation of an appropriate processional route to the residence of the Governor-General between Adelaide Avenue (as a Main Avenue) and Dunrossil Drive
- Comprehensive remediation of contamination across the entire Brickworks site and environs
- Development, consideration, and implementation of a business plan for the Brickworks.

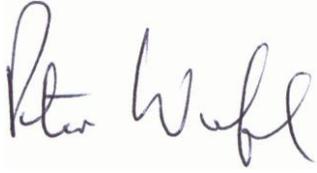
All of these actions are required in any case whether or not the brickworks precinct is developed for dense residential development. Only when these contextual issues have been fully addressed and implemented should the site development proposal be resubmitted, based at that time on sound planning principles and environmental suitability. A useful way forward could include a design competition for development of a master plan.

These matters are further discussed in the attachment.

Until these matters are resolved, we strongly recommend that further progress on the proposed *Canberra Brickworks and Environs Planning and Development Strategy* by LDA be suspended, and that progress on the issues identified in this submission be undertaken by another body that can

address the comprehensive planning free of the conflicting requirement to maximise short-term revenue from land sales.

Yours faithfully

A handwritten signature in black ink, appearing to read "Peter Wurfel", is placed on a light yellow rectangular background.

Peter Wurfel  
President  
Deakin Residents' Association Inc.

14<sup>th</sup> June 2014

***The need for a transport planning study***

From papers made available on the LDA website and through FOI, it is clear that transport planning is a key consideration for a properly planned development of this scale, but has not been effectively considered.

Elements which need to be considered and addressed, irrespective of the proposed estate development, include:

- Identification of current problems being experienced in the area surrounding the proposal, including the current traffic problems in Kent/Novar Streets, and Dudley Street
- The current and emerging traffic impact of development in Molonglo suburbs as the population moves towards its eventual 55,000 residents
- Appropriate design of a processional route to the residence of the Governor- General between Adelaide Avenue (as a Main Avenue) and Dunrossil Drive

Key outcomes from the proposed transport study would be expected to include:

- Implementation of measures to support active travel (pedestrians, cyclists, motorised scooters, etc.) in and around Deakin and Yarralumla more generally – to include upgraded and interconnecting shared pathways, improved street lighting, more appropriate pedestrian crossings, bus shelters, etc.)
- Implementation of a bus stop at the Kent/Novar overpass to facilitate access - by residents, school children attending Deakin High, and those employed in west Deakin – to fast efficient public transport on Adelaide Avenue
- Implementation of the proposed interchange to/from Cotter Road (and potentially into Denison Street)
- Implementation of an improved processional route to the residence of the Governor-General.

***A business plan for the brickworks***

The current proposal does not present any convincing picture of the relationship between the Brickworks site and the proposed residential development.

There is no necessary financial interdependence between the brickworks rehabilitation and the residential land development, but until a viable plan has been created for the brickworks itself, there can be no confidence in how it will interrelate with the surrounding residential areas.

A minimal amount of \$1.5 million in funding has been identified in the strategy to “make safe” the brickworks.

There is a significant risk that the brickworks could, at some stage, emerge as a significant tourism and/or commercial opportunity. It is already being used – and promoted – in a limited way.

If further development were to occur in an unplanned way, the consequences to surrounding residents will be immense – through traffic, parking, noise, and potential pollution.

A business plan needs to be developed to inform discussion and guide planning.

***A comprehensive site analysis, to address design and siting issues***

This is a unique site, with both ACT and Commonwealth interests, at the very heart of Canberra, with heritage elements, and adjacent to some of the oldest suburbs in Canberra.

It intersects with the National Capital Open Space System, and the adjoining suburbs reflect the *Garden City Principles* outlined by the ACT Planning and Land Authority in 2008.

The views and vistas are unique –including from the west towards the site - and the preservation (and renewal) of the larger trees and vegetation on the site is essential. The proposal as it currently stands pays no regard to the specific topography associated with the site.

There are also specific flora and fauna issues such as native grasses and Golden Sun moth habitat which remain to be addressed.

The site analysis must also have regard to the outcome of matters identified elsewhere in this paper which will have an influence on what will be capable of achievement through any estate development.

***Effective consultation by LDA with both the ACT Planning and Land Authority (as the key planning agency representing the ACT interest) and the National Capital Authority (similarly, the key planning agency representing the Commonwealth interest)***

The LDA appears to have been given a high-risk brief to bring land sales to market for the ACT Government.

Of itself, this is not unreasonable.

However, it appears that the complexities associated with this site go significantly beyond what the LDA is resourced or qualified to deal with.

The community of interests involved in this site is very broad – it includes:

- Yarralumla/Deakin residents and business operators
- Workers - in West Deakin primarily, but also in commercial premises at Yarralumla/Deakin local centres

- Curtin/Weston Creek and Molonglo residents and other commuters dependent on the east-west roads corridor
- The ACT and Commonwealth Government responsibilities for community amenity and the National Capital function of Canberra
- Future generations of Australians – because of the heritage values associated with the brickworks

All stakeholders must have confidence in the process and the outcomes.

Deficiencies in the outcome of processes so far suggest that that the LDA - or some other body - needs to engage more effectively with other elements of Government(s), most particularly those with broader planning responsibilities, as well as the community.