

# Design Response Report

Blocks 1, 7, and 20  
Section 102  
Yarralumla

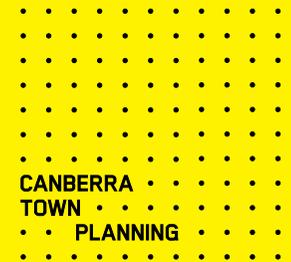
## EDP DA

FOR ASSESSMENT

Prepared for:

Doma Group

September 23



Prepared by:

Nichelle Jackson

Director - Town Planner

[nichelle@canberratownplanning.com.au](mailto:nichelle@canberratownplanning.com.au)

Hamed Vaziri Pashkam

Manager - Town Planner

[hamed@canberratownplanning.com.au](mailto:hamed@canberratownplanning.com.au)

Audrey Rahimi

Project Officer

[audrey@CanberraTownPlanning.com.au](mailto:audrey@CanberraTownPlanning.com.au)

[canberratownplanning.com.au](http://canberratownplanning.com.au)

Version Control

4.09.2023: EDP DA Tech-Check Submission

## Contents

---

<b>1</b>	<b>Introduction .....</b>	<b>4</b>
1.1	Background and Previous Submissions .....	4
1.2	This Report.....	5
<b>2</b>	<b>The Site and Proposed EDP DA .....</b>	<b>6</b>
2.1	Site Context .....	6
2.2	Description of the Proposal .....	7
2.3	Staging .....	9
2.4	Technical Amendments .....	9
2.5	Concept Delivery Deed .....	10
2.6	Environmental Management and EIS.....	11
2.7	Heritage and Conservation Management Plan .....	17
2.8	Assessment Track .....	18
2.9	Pre-lodgement Consultation .....	18
<b>3</b>	<b>Estate Design Intent .....</b>	<b>20</b>
3.1	Objectives .....	20

3.2	Vision.....	20
3.3	Residential Design Intention .....	21
3.4	Commercial Design Intentions .....	21
3.5	Landscaping design .....	22
3.6	Access and parking .....	22
3.7	Proposed Land Tenure .....	24
<b>4</b>	<b>Submission Strategy and Applicable Codes .....</b>	<b>25</b>
<b>5</b>	<b>ACT Planning Policies .....</b>	<b>27</b>
5.1	ACT Planning Strategy 2018 .....	27
5.2	ACT Climate Change Strategy 2019-2025 .....	29
<b>6</b>	<b>Yarralumla Neighbourhood Plan .....</b>	<b>31</b>
6.1	The Yarralumla Brickworks .....	31
<b>7</b>	<b>Attachments .....</b>	<b>32</b>

# 1

## Introduction

This document has been prepared to meet the requirements for the submission of an Estate Development Plan (**EDP DA**) for the creation of a new residential and commercial development in Yarralumla (Canberra Brickworks Precinct).

This report addresses the requirements of the Territory Plan and other relevant ACT government policies in relation to land development in support of this submission.

### 1.1 Background and Previous Submissions

In June 2016 the Doma Group responded to a Request for Proposal for the redevelopment of the Canberra Brickworks released by the Land Development Agency (LDA) and was successfully shortlisted to compete in the Request for Tender stage in November 2016, which was lodged on 19 January 2017.

Doma were nominated as the preferred proponent for the development in April 2017 and after lengthy negotiations, signed the land sales contracts and Concept Delivery Deed (CDD) in September 2019.

The site measures 16.1ha and is located in the inner south suburb of Yarralumla. The majority of the land is unimproved other than the central Brickworks Heritage Core which the Commonwealth Government established in the early 1900s to support the development of Canberra as the new Federal Capital. Many of the existing buildings, together with the Quarry and Railway Remnants have been placed on the ACT Heritage register.

A Concept Estate Development Plan was lodged with the Deed Management for Agency Circulation in May 2020 and comments received in August 2020.

The proposed development of the estate triggered the Impact Track and therefore is being considered through the Environmental Impact Statement (EIS) process. A draft EIS was lodged in May 2021, notified and comment received in August 2021. Doma has responded to EIS comments and relodged with EPSDD in March 2022 with endorsement expected in August 2022.

A Draft EDP was submitted for Entity Circulation in 2022 with comments received from entities in October 2022. The designs were then progressed to address the comments received from entities.

## 1.2 This Report

This report describes the design response to the relevant rules and criteria in the Territory Plan for a staged Estate Development of the precinct.

The information provided describes the intended services to facilitate the development of the Brickworks precinct, which is to comprise the following stages:

Stage	Dwellings
1A	Heritage Core, 2 multi-unit blocks, Quarry Park, Brickworks Way, the Community Title lands in between, and associated infrastructure
1B	22 single dwelling blocks and associated roads and infrastructure
2 (2A, 2B, and 2C)	18 single dwelling blocks, 7 multi-unit blocks, The Remnants, the remainder of Community Title lands, and associated infrastructure
<b>TOTAL Dwellings</b>	<b>380 dwellings</b>

Details of the proposed works are provided in the plans that accompany this EDP DA submission.

This report has been prepared to meet the requirements of a Design Response Report, prepared in accordance with the Guidelines for the preparation of Estate Development Plans (2009). It contains an assessment of the proposal against the rules and criteria from the relevant codes in the Territory Plan (**Attachment A**).

# 2

## The Site and Proposed EDP DA

The site that is the subject of this application includes the following land:

Block	Section	Division
1	102	Yarralumla
7	102	Yarralumla
20	102	Yarralumla

Off-site works are proposed to be undertaken along the sites' street frontages (Denman Street and Bentham Street) and on Block 1 Section 127 and Block 3 Section 94 Yarralumla (to the west and south of the site). In addition, a footpath and watermain extension along Denman Street to the south is proposed as shown on the offsite works plan submitted with this application. Please refer to the Off Site Works plans submitted for further information.

### 2.1 Site Context

The site fronts Bentham Street to the north-east, and Denman Street to the south-east. Existing Yarralumla residential neighbourhoods are located to the east and north of the site ('RZ1 Suburban' zoned blocks under the Territory Plan), while restricted access recreation zoned (PRZ2) sites with scattered trees are located to the south and west of the site. Beyond the PRZ2 site to the west is the Royal Canberra Golf Club while the former CSIRO Forestry School and Oval is located to the north-east of the site. The Yarralumla Local Centre (CZ4 zoned) is located within circa 300 metres of the site to the east. The site context has been shown on **Figure 1** below.



Figure 1: Local Context (the site is hatched blue) (ACTmapi, 2023)

## 2.2 Description of the Proposal

This proposal represents a significant urban renewal project that will revitalise a historic heritage area in the suburb of Yarralumla, restoring and activating the Brickworks industrial site and immediate surrounding areas. The development spans an area of approximately 16 hectares and comprises:

- Creation of 40 single dwelling blocks and 8 multi-unit residential blocks;
- Creation of 1 commercial block (Heritage Core);
- Creation of multiple open space blocks;
- Works to provide service connections (on-site);
- Removal of a number of on-site trees;
- Bulk earthworks and site grading to facilitate creation of proposed blocks and roads;
- Internal roads;
- A stormwater retention pond to the north-east of the site;
- Shared paths and landscaping (on-site);

In addition, this submission identifies potential off-site works in the areas surrounding the site, proposed to be delivered by the proponent including:

- Connections to the existing surrounding road network;
- Connection to the existing off-site services; and
- Connection to the existing active travel network.

The proposed works are identified on the EDP DA documentation that accompany this submission.

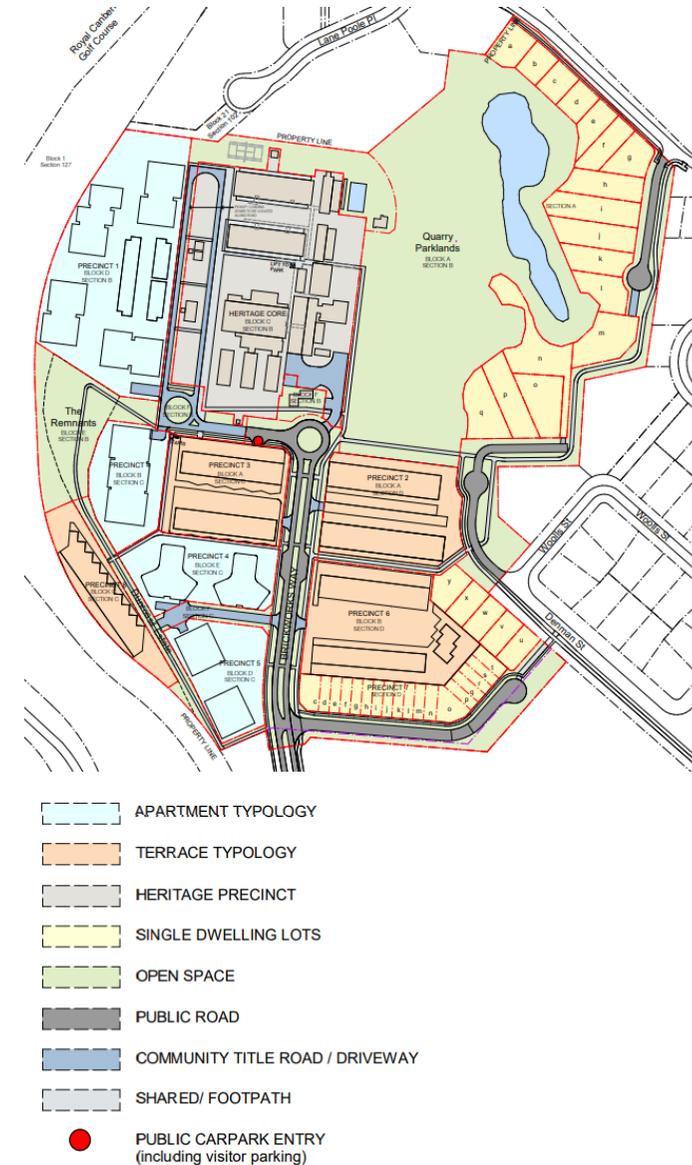


Figure 2: Extract from EDP Master Plan (SJB, 2023)

In this submission (EDP DA), the Concept EDP and the subsequent Draft EDP block labels have been changed as per the table below.

Concept EDP Label	Draft EDP Label	EDP DA Label(this submission)
Precinct 1	Precinct 1	Block d Section B
Precinct 2	Precinct 2	Block a Section D
Precinct 3	Precinct 3	Block a Section C
Precinct 4	Precinct 4	Block b Section C
Precinct 5	Precinct 5	Block e Section C
Precinct 6	Precinct 9	Block d Section C
Precinct 7	Precinct 6	Block b Section D
	T4	Block x Section D
	T5	Block y Section D
Precinct 8	Precinct 7	Block c Section D
		Block d Section D
		Block e Section D
		Block f Section D
		Block g Section D
		Block h Section D
		Block i Section D
		Block j Section D
		Block k Section D
		Block l Section D
		Block m Section D
		Block n Section D
		Block o Section D
Block p Section D		
Block q Section D		
Block r Section D		
Block s Section D		
Block t Section D		

Concept EDP Label	Draft EDP Label	EDP DA Label(this submission)
Precinct 9	Precinct 8	Block c Section C
T1	Precinct 6	Block b Section D
T2	Precinct 7	Detailed earlier.
T3		
T4	T1	Block u Section D
T5	T2	Block v Section D
T6	T3	Block w Section D
T7	T6	Block q Section A
T8	T7	Block p Section A
T9	T8	Block o Section A
T10	T9	Block n Section A
T11	T10	Block m Section A
T12	T11	Block l Section A
T13	T12	Block k Section A
T14	T13	Block j Section A
T15	T14	Block i Section A
T16	T15	Block h Section A
T17	T16	Block g Section A
T18	T17	Block f Section A
T19	T18	Block e Section A
T20	T19	Block d Section A
T21	T20	Block c Section A

## 2.3 Staging

The proposed staging for the development is as per the below table and as shown on the Staging Plan (by Sellick Consultants).

Proposed stage	Proposed start dates	Proposed finish dates
Stage 1	2024	2026
Stage 2A	2025	2027
Stage 2B	2025	2027
Stage 2C	2025	2027

## 2.4 Technical Amendments

A technical amendment was proposed and approved (under Section 87(1)(b) of the Act) to change the RZ1 Suburban Zone land fronting Bentham Street to CZ6 Leisure and Accommodation Zone (TA2022-09). This technical amendment was placed on consultation on 5 August 2022 which was closed on 2 September 2022. The site is now entirely zoned CZ6 (**Figure 3**).

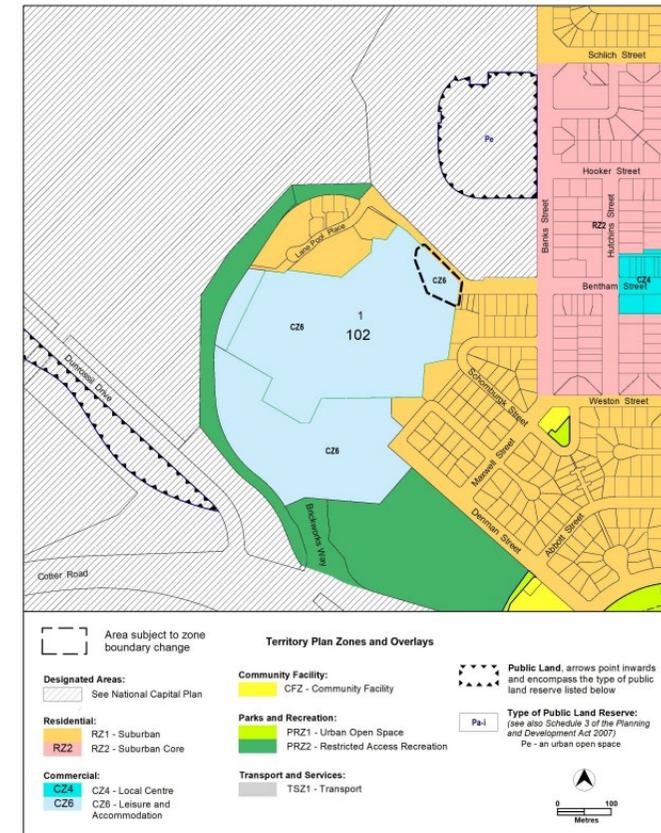


Figure 3: Extract from TA2022-09 (consultation version) (*EPSDD website, accessed August 2022*)

Another technical amendment has been proposed for the Heritage Core regarding the definition of the gross floor area (GFA) to exclude thick kiln walls from the calculation of GFA. This matter is being finalised parallel to this EDP DA submission.

## 2.5 Concept Delivery Deed

The Suburban Land Agency and Developer (Doma) have negotiated and agreed that the proposal made by the Developer in its successful Tender Response as to the future development of the Canberra Brickworks Precinct is the subject of enforceable rights and obligations of the Deed. The Deed sets out:

- the terms and conditions on which Doma will undertake the development of the Land;
- the consultations and community involvement the Developer will undertake in planning and carrying out the development of the Land;
- the terms and conditions on which the Suburban Land Agency will:
  - settle the Contract for Sale; and
  - support the grant of the Holding Lease and the Deed of Agreement for the Land; and
- the mechanism for agreeing to amendments to the Design Documents which may be proposed by either party as design development progresses.

The proponent has actively engaged with the SLA and adopted their requirements during the preparation of the EDP DA.

## 2.6 Environmental Management and EIS

A referral to the Commonwealth Department of the Environment and Energy (DoEE, now the Department of Agriculture, Water and the Environment) was prepared and submitted for the proposed works (EPBC 2017/8078); which was subsequently found to be a 'controlled action' due to potential significant impact to threatened species, namely Golden Sun Moth (*Synemon plana*). As such, an Environmental Impact Statement (EIS) under the Bilateral Agreement was requested in order for both the Commonwealth and the EPSDD to assess the Proposal.

A Scoping Document Application was then submitted on 28 November 2019, with the Scoping Document provided on 16 January 2020. Following this, an EIS was prepared consistent with the EPSDD's guidelines for the preparation of EIS, addressing the issues raised within the Scoping Document. A Draft EIS was submitted to the EPSDD on 3 June 2021. A request for a revised EIS was then issued by the EPSDD on 4 August 2021. The final revised EIS was submitted to EPSDD on 21 March 2022.

The EIS presented the findings of the specialist environmental investigations undertaken for the proposal and the potential and likely environmental impacts identified thereto. The EIS also set out the undertakings made by the proponent to manage and minimise potential impacts arising from the development.

In summary, the EIS has found that the potential environmental impacts associated with the Proposal can be adequately managed and minimised to an acceptable level.

Please refer to **Attachment AR – Canberra Brickworks Precinct Environmental Impact Assessment** and related ecological assessments and reports submitted with this application for more information.

On 13 June 2023, the Minister for Planning and Land Management gave notice to the planning and land authority under section 226 of the Planning and Development Act 2007 (the Act) that he has decided to take no action in relation to the Environmental Impact Statement (EIS). This means that the EIS process is complete.

The table of recommended conditions (from the EIS Assessment Report 2023) and the proposal's performance against these matters has been provided below.

No.	Condition contents	Endorsement/ approval	Construction stage	Draft condition of approval	Response
1	General	Planning and Land Authority	All works	All works must be consistent with the mitigation measures in Table 21.1 of the Canberra Brickworks Precinct Redevelopment Revised Environmental Impact Statement, prepared by Umwelt (Australia), dated 3 February 2023 (the EIS).	The works proposed are consistent with Table 21.1 of the EIS.

No.	Condition contents	Endorsement/ approval	Construction stage	Draft condition of approval	Response
				Where mitigation measures cannot be incorporated into detailed design, each remaining mitigation measure must be outlined in a Construction Environmental Management Plan (CEMP).	
2	DA Documentation	Planning and Land Authority	Development Application	As part of any subsequent development application relying on the EIS, a document must be provided detailing how the recommended mitigation measures in Table 21.1 of the EIS and the conditions in this report have/will be met.	The works proposed are consistent with Table 21.1 of the EIS.
3	Estate Design	Planning and Land Authority	Before construction	<p>The design of the precinct must be consistent with the masterplan in figure 2.2 of the EIS to match the character of the surrounding residential and parkland area and avoid impacts on urban amenity.</p> <p>The proposal will have low density development at the interface with residential areas on the east and north-east sides of the proposal area. Existing buildings will separate residential areas north of the proposal area from the central high density area of the development.</p>	<p>The design of the precinct is generally consistent with Figure 2.2 of the EIS that would match the character of the surrounding residential and parkland area by providing a low to medium density development across the precinct while maintain open space if for of parkland and other publicly available spaces.</p> <p>Lower densities have been proposed to the east, northeast, and southeast of the estate to avoid impact on urban amenity and complement the existing urban context.</p>
4	Utility Design	Planning and Land Authority	Before construction	<p>Utility plans must be endorsed by relevant utility providers.</p> <p>The gas infrastructure installation plans must be referred to Climate Change and Energy Division (EPSDD) and EvoEnergy, and plans endorsed by EvoEnergy.</p>	Information has been provided with this application for referral to entities.
5	Construction Traffic Management Plan	TCCS	Before construction	<p>A Construction Traffic Management Plan must be developed to manage vehicle traffic and parking during construction. The traffic management plan will include:</p> <ul style="list-style-type: none"> <li>• Construct Brickworks Way during stage 1 to ensure construction access is via Brickworks Way</li> <li>• Management of truck movements</li> <li>• Consultation with surrounding residents</li> <li>• Emergency response procedures</li> </ul>	A CTMP will be prepared prior to construction in accordance with this requirement.

No.	Condition contents	Endorsement/ approval	Construction stage	Draft condition of approval	Response
				<ul style="list-style-type: none"> <li>Avoidance of heritage and environmental conservation areas</li> </ul>	
6	Traffic and Parking Assessment	TCCS	Before construction	<p>Further detailed traffic and parking assessments must be provided, that demonstrate compliance with relevant Territory Plan codes and are to the satisfaction of referral entities.</p> <p><u>Parking</u></p> <ul style="list-style-type: none"> <li>Parking provided will exceed anticipated parking demand and include public and private car and bicycle parking.</li> <li>The development will include active travel options to reduce the need for vehicle transport.</li> </ul> <p><u>Traffic</u></p> <ul style="list-style-type: none"> <li>A traffic impact assessment report must be submitted with the estate development plan DA.</li> <li>Public vehicles will be unable to travel on the connecting road between Brickworks Way and Denman Street. Only emergency access will occur between Brickworks Way and Denman Street.</li> </ul>	The Traffic Impact and Parking Report has been revised to address these items. This report has been included in this submission for referral to TCCS ( <b>Attachment C – Traffic and Parking Report</b> ).
7	Bushfire Protection	Planning and Land Authority	Before construction	<p>Outer and inner asset protection zones must be established and managed to protect the development from bushfire spreading from the south-east, south, south-west and west as described in the Bushfire Risk Assessment (Appendix F20 and F47).</p> <p>The OEMP must detail the management actions required to maintain the OAPZ and IAPZ, including agreements with landowners where an APZ is outside the Brickworks precinct.</p>	A revised Bushfire report has been prepared and included in this submission for assessment ( <b>Attachment H – Bushfire Risk Assessment Report</b> ).

No.	Condition contents	Endorsement/ approval	Construction stage	Draft condition of approval	Response
8	Landscape Master Plan	Planning and Land Authority	Before construction	The DA must be consistent with the draft Landscape Master Plan to ensure the development achieves a high tree canopy cover, achieves shading and urban cooling, provides fauna/wildlife habitat and replaces the ageing low quality trees that will be removed. The Landscape Master Plan must be consistent with the targets in Canberra's Living Infrastructure Plan 2019.	The designs have been progressed in accordance with the draft LMP to achieve a high tree canopy cover, achieve shading and urban cooling, provide fauna/wildlife habitat and replace the ageing low quality trees that are proposed for removal.  A 30% tree canopy has been provided across the estate through the retention of some of the existing tree while proposing new trees.
9	Heritage	ACT Heritage Council	Before construction	The development proposal must be designed and constructed consistently with the latest version of the Canberra Brickworks Conservation Management Plan and advice and conditions provided by the ACT Heritage Council.	The proposal is consistent with the approved CMP.
10	Construction Environmental Management Plan (CEMP)	Planning and Land Authority	Prior to construction	A CEMP must be prepared and submitted to the planning and land authority (EPDImpact@act.gov.au) for endorsement. The CEMP must outline the construction conditions/methods and temporary environmental protection measures to manage the impact of construction activities, consistent with the EIS. The CEMP must include the mitigation measures proposed in the EIS and any relevant management plans including, but not limited to: <ul style="list-style-type: none"> <li>• Flora and fauna management</li> <li>• Reporting unapproved impacts on MNES to EPSDD</li> <li>• Weed management</li> <li>• Erosion and sediment control</li> <li>• Bushfire management</li> <li>• Contamination Unexpected Finds Protocol</li> <li>• Health and Safety Protocol for works at AEC's</li> <li>• Chemical Spill Management Protocol</li> <li>• Noise management</li> </ul>	A CEMP will be prepared and submitted to EPSDD for assessment prior to construction works.

No.	Condition contents	Endorsement/ approval	Construction stage	Draft condition of approval	Response
				<ul style="list-style-type: none"> <li>• Dust and air quality management</li> <li>• GHG emissions from construction machinery</li> <li>• Environment Protection Agreement with the EPA</li> <li>• Heritage Unexpected Finds Protocol</li> <li>• Waste management</li> <li>• Surface water management</li> </ul>	
11	Contamination and Occupation Approval	Environment Protection Authority (EPA)	During and Post construction	<p>The contamination at the site must be remediated by a suitably qualified environmental consultant in accordance with the:</p> <ul style="list-style-type: none"> <li>• Sampling, Analysis and Quality Plan</li> <li>• Remediation Works Plan, including a Safe Work Method Statement</li> <li>• Site Management Plan The site must be audited by an accredited site auditor and the EPA must endorse the site audit and provide agreement that the site is suitable for its intended use prior to occupation of the development, including occupation of residential units.</li> </ul> <p>Any ongoing contamination management actions (for example, monitoring of contamination) must be included in the development's OEMP.</p>	The contamination remediation will be conducted by a suitably qualified person per the requirements on the EIS.
12	Environment Protection	EPA	Before construction	The development must be constructed under an Environment Protection Agreement with the EPA under the Environment Protection Act 1997.	This matter will be delivered prior to construction.
13	Golden Sun Moth impact	Planning and Land Authority	During construction	<ul style="list-style-type: none"> <li>• The proponent must not clear more than 1.58 hectares of GSM habitat.</li> <li>• The proponent must not clear GSM habitat outside of the approved area of clearance.</li> </ul>	This matter will be delivered during construction.

No.	Condition contents	Endorsement/ approval	Construction stage	Draft condition of approval	Response
14	Waste Management Plan (WMP)	Transport Canberra and City Services (TCCS)	Prior to Construction	A WMP must be prepared and must include training for personnel in waste sorting.	The Waste Management Plan has been prepared and submitted for assessment ( <b>Attachment AT – Waste Overview</b> ).
15	Water Management	Planning and Land Authority	Prior to Construction	<p>The Stormwater Quality Treatment Strategy (Appendix F14, Alluvium 2022) must be implemented.</p> <ul style="list-style-type: none"> <li>Stormwater plans must be referred to and endorsed by TCCS.</li> <li>The development must meet the requirements of the WSUD General Code. This includes ensuring post development stormwater flows do not exceed predevelopment flows and installing a litter trap at the pumping location to prevent gross pollutants entering waterways.</li> <li>Hydrological modelling must be conducted during the DA stage to assess peak stormwater flows, peak storage levels and storm durations for sizing stormwater detention storage.</li> <li>Groundwater quality must be monitored at regular intervals (e.g. biannually) throughout construction and operation by implementing the Sampling, Analysis and Quality Plan (SAQP).</li> </ul>	The Stormwater Quality Treatment Strategy has been adopted per the WSUD report by Alluvium ( <b>Attachment B – Stormwater Treatment Systems</b> ).
16	OEMP		Prior to Operation	<p>A OEMP must be prepared and submitted to the planning and land authority which includes</p> <ul style="list-style-type: none"> <li>management of contamination</li> <li>weed management</li> <li>surface water management</li> <li>ongoing waste management measures that aim to facilitate alternative waste management practices within the site, such as recycling and reuse.</li> </ul>	An OEMP will be prepared and submitted to EPSDD for assessment prior to operation.

## 2.7 Heritage and Conservation Management Plan

The Canberra Brickworks Precinct is a significant historic site with a distinctive historic industrial character. It has recognised heritage significance through listing on the ACT Heritage Register as the ‘Yarralumla Brickworks’, and the associated ‘Yarralumla Brickworks Railway Remnants’.

An updated Conservation Management Plan (**CMP**) has been prepared and approved by the ACT Heritage Council which has been submitted with this EDP DA. A Statement of Heritage Effects has been submitted parallel to this EDP DA submission consistent with the CMP.

The study area referred to in the CMP is the ‘Canberra Brickworks Precinct’—Blocks 1, 7, and 20 Section 102. The Precinct includes two ACT Heritage Register places:

- ‘Yarralumla Brickworks’ (‘Canberra Brickworks’ or ‘Brickworks’)—located in Block 1 Section 102; and
- ‘Yarralumla Brickworks Railway Remnants’ (‘Railway Remnants’)—located in part of Block 7 Section 102.

This CMP has been prepared to revise the existing 2010 CMP and to include the associated Railway Remnants heritage place (listed on the ACT Heritage Register in 2013). The provisions of the *ACT Heritage Act 2004* apply only to the registered heritage boundaries and citation of the two places within the Canberra Brickworks Precinct.

Conservation policies guide the ongoing management of the Precinct, to support strategic decision making for the future, as well as assist with legislative compliance and conservation of the site’s heritage significance.

The following principles form the basis for the conservation policies, including:

- retention, conservation, management, and interpretation of the heritage significance, which is embodied in the attributes and elements of the site;
- identification of where and how change, adaptation (including identifying new appropriate uses) and new development can be undertaken on the site, that is compatible with the heritage significance and can provide for the conservation of significant elements;
- seeking professional heritage and building conservation advice for proposed works and redevelopment; and
- exploring opportunities to interpret the heritage significance, and maintaining records in relation to proposed and/or implemented changes to the place.

An inventory of individual elements is provided at Appendix A of the CMP. The inventory provides conservation guidance for intrinsic features, that are core and supporting elements of the site’s heritage significance. An inventory of Moveable Relics is provided in Appendix H of the CMP.

Please refer to the heritage documentation within the EIS report and **Attachment AS - Interpretation Strategy** submitted with this application for more information.

## 2.8 Assessment Track

There are 5 types of development application that are required to be assessed in the Impact Track. These 5 types are listed in the relevant zone development table and are discussed in Table 1 below.

Table 1: Requirements for Impact Track Assessment

Type	Response
1. Development that is not an exempt, code track or merit track development where the development is otherwise authorised	Not Applicable
2. Development specified in schedule 4 of the Planning and Development Act 2007 and not listed as a prohibited use.	Applicable. The proposal is subject to the assessment of an Environmental Impact Study due to potential for impact on a critically endangered species under the EPBC Act, as noted under item 1 of Schedule 4 of the Act.
3. Development that is authorised by a lease and listed as a prohibited use in this table.	Not Applicable. The proposed use is not a prohibited use.
4. Development declared under section 124 or section 125 of the Planning and Development Act 2007 and not listed as a prohibited development.	Not Applicable. Declarations have not been made.
5. Varying a lease to add a use assessable under the impact track.	Not Applicable Uses are not being added.

On this basis, the application triggers the Impact track approvals pathway and is to be submitted under the Impact track. The completed EIS documentation has been included in this submission.

## 2.9 Pre-lodgement Consultation

The following types of development trigger the requirement for pre-lodgement community consultation under section 20A of the *Planning and Development Regulation 2008*:

- a building for residential use with 3 or more storeys and 15 or more dwellings;
- a building with a gross floor area of more than 5000m<sup>2</sup>;
- if the development proposal is for more than 1 building — the buildings have a total gross floor area of more than 7,000m<sup>2</sup>;
- a building or structure more than 25m above finished ground level;
- a variation of a lease to remove its concessional status;
- **the development of an estate** (an estate development plan)
- a proposal required to be reviewed by the National Capital Design Review Panel.

As the estate development proposal is an item included in this list, there is a specific requirement for pre-DA lodgement consultation on this proposal.

Given the location and scale of the development proposal, a comprehensive program of community consultation has been undertaken since February 2020 as detailed under **Attachment S – Community Consultation Summary Report** and is still ongoing as at the submission of this EDP DA.

The sale of the estate by the Suburban Land Agency comprised intensive community consultation requirements including adherence to a Consultation Plan. The following consultation requirements have been identified under the Community Engagement Plan (submitted with the EIS) and undertaken to date for the EDP DA:

- One-on-one meetings with government
- Monthly meetings with Community Panel
- Monthly meetings with Community Panel
- Written report to key stakeholders
- Summary consultation report
- Website and social media updates.

The most recent community event for the site was held on 13 July. The link to the community presentation is included on Doma's website (below link).

<https://www.brickworkscommunity.com.au/post/brickworks-fourth-community-presentation>

# 3

## Estate Design Intent

### 3.1 Objectives

The vision for the redevelopment of the site is to achieve the following development outcomes:

- The celebration of heritage by establishing a viable future use for the Brickworks to ensure its physical conservation and to protect its history.
- Integration with the landscape by embedding the existing 'garden suburb' landscape character into the design of the streets, parklands, public and private space.
- Providing streets for people by making safe movement of pedestrians and cyclists a priority.
- Provision of diversity of housing through innovative housing types to suit the diversity and needs of a growing Canberra.
- Ensure environmental sustainability by creating unique environmentally sustainable development, homes, streets, and open spaces.

### 3.2 Vision

The vision for the Brickworks Master Plan has been built on the following principles:

- Residential development will not dominate the heritage elements.
- Development planning ensures the site is not dominated by roads and cars.
- Test a range of concepts and potential uses to determine the appropriate scale of the retail and commercial development.
- Target residential product to the market that is not enamoured by more urban, noisy, and dense traditional residential infill.
- Brickworks must become known for something unique and "own" its segment in the Canberra market.
- Significant visitation is required seven days a week and throughout the day for the viability of the retail and restaurant components.
- The site components represent different elements of the industrial process of brick making, allowing the story to be told in a subtle yet accessible way.

### 3.3 Residential Design Intention

To achieve the key development outcomes of the precinct the following design principles have been recognised and included in the EDP DA:

- A ‘Garden Setting’ for consistency with Canberra’s Garden City Principles
- A network of communal open spaces, amenities, and vegetable gardens convenient to each apartment building cluster. The building footprint and typology is designed to create more green space between buildings.
- ‘Bricks as the dominant material’ – an obvious gesture to the history of the Brickworks. Brick is a warm and enduring material with longevity and association with traditionally lower rise residential dwellings and the origins of Canberra’s housing.
- Maximise north-facing units and cross ventilation, optimising orientation to catch the sun and breezes consistent with good practice.
- Aspect and relationship – encourage varying levels of density in micro pockets around the site as well as respecting the neighbouring properties on the site fringe along Denman Street and the ridge.
- Appeal to the target market with a product offering that is unique to Canberra. The Request for Tender restricted the number of dwellings to 380, but allowed the possibility of adding aged care, hotels, and the like to increase the density. However, the EDP DA proposal exercises restraint and recognises that creating more development than the 380 dwellings may be detrimental.
- Minimise the visual impact of cars and service vehicles, through considered design of streets, car parking, and servicing strategies.
- Minimise the visual impact of roads by delivering a waste collection and visitor parking strategy that reduces the area taken up by roads, coupled with nestling of minor roads in the landscape using the natural contours.
- “Topographic Sympathy” that disperses housing amongst the land to suit the contours.
- Provide financially viable uses in the heritage elements suited to support their future maintenance.
- Strike the optimal balance between creating too much public use with associated vacancies, parking, and servicing infrastructure, or too little that the precinct does not achieve a critical mass.
- Financial resilience – the success of this project and ongoing management of the Brickworks needs the development and residential offering to be successful.

### 3.4 Commercial Design Intentions

There is a strong desire that demand for activities at the Brickworks do not overspill into the existing Yarralumla streets. If activities with too high a demand are created in the Precinct, such as regular markets, they will require significant parking infrastructure to support them, or else visitors will spill out into the street. If a great deal of parking infrastructure is required, more expensive parking solutions will be required, giving rise to higher paid parking charges, which again will encourage cars to be parked in the existing Yarralumla streets (given that pedestrian access to the site is easy).

Consequently, the non-residential activities on the site will be curated so that:

- there is a point of difference with the uses to make them a destination;

- the different uses attract people at different times through the day so that there is a steady stream of people on the site rather than big spikes in visitors. This is important both for the viability of the businesses on site, but also so that there is not a spike in peak parking load that requires significant and expensive infrastructure to be provided;
- non-vehicular users are attracted as much as possible;
- there is a small measure of convenience retail on site, which will also partly serve the immediately surrounding population;
- that the site “owns” a unique space in the marketplace.

Following these principles, the proposed uses and amenities will create the optimal level of activity without requiring excessive infrastructure. These uses are designed to provide all day activation with unique offerings at an optimal scale. Importantly, each of the experiences provided on site will aim to allow for interaction between residents, commercial operators, employees, and existing Yarralumla residents as well as visitors from the wider Canberra area.

### 3.5 Landscaping design

Doma Group understands the need to integrate the Land’s heritage, cultural, and geological elements to maintain the connection to the industrial process that took place at the Brickworks. Doma Group’s Master Plan sees the Brickworks become the public centrepiece of an open, landscaped park, plaza, and pedestrian network that is highly permeable with an abundance of interesting spaces to visit.

The Railway Remnants and Quarry Park are central to this approach and these areas will be delivered as publicly accessible parkland.

Strong design direction from Doma Group focussed the design team to achieve a unique and distinctive

destination that provides for a diversity of activities that the broader community will enjoy.

Communal gardens have been proposed across the estate in locations identified in the Landscape Master Plan submitted with this application.

A wetland and pond has been proposed within the Quarry Park, where there is an existing depression. The wetland will receive inflow from the combined sub catchments within the site, with the 3 month ARI being diverted into the sediment basin, then flowing into the macrophyte zone, and finally the pond.

Please refer to the Landscape Master Plan which indicates the location of the pond, wetland, and sediment basin (bioswale).

### 3.6 Access and parking

The main access to the proposed Brickworks development will be via the completion of Brickworks Way, which extends from the northern leg of the roundabout on Dudley Street. There will also be access to the development via Bentham Street and Denman Street, which will serve the single residential lots on the east side of the estate.

Service access is proposed via the extension of Brickworks Way. A central waste collection facility is proposed for both residential and commercial waste within the Heritage Core.

An edge road running along the south-eastern boundary of the development, connecting Denman Street and Brickworks Way is also proposed to be included as part of the development works. A ranger gate is proposed to be installed at the connection of the edge road to Denman Street and shall remain closed except within an emergency. This physical barrier prevents though traffic from using this link to navigate through the suburbs and prevents any possible rat-running through the site. As through movements are not achievable along this road, the addition of this road to the development is not expected to impact the currently modelled traffic operations or performance through the surrounding road network.

### **Adequacy of Car Parking**

The parking for the proposed development will meet the demand for both the private and public land uses. The car parking provision requirements for various types of developments are detailed in the Parking and Vehicular Access General Code (PVAGC). No specific rates for Residential parking are provided in the Code. As such, the proposed development was designed using the standard residential parking rates from the PVAGC (3.1.5 schedule 1), which are accepted as the general parking rates for residential in the ACT. There are no issues identified in the minor differences in the objectives between sections 3.1.1 and 3.2.1 of the PVAGC.

The rates used are the same that were used in the Memo by Calibre and are outlined below. When considering the temporal parking demand, it is estimated that the peak demand will occur at 8:00pm for the site and require a total of 312 public parking spaces across the site. This results in a surplus of 9 public parking spaces during the peak hour period. The minimum required 200 publicly available parking spaces per the Tender Obligations will be provided within Precinct 3 (please refer to **Attachment C – Traffic and Parking Report** for more information).

### **Accessible, Motorcycle and Bicycle Parking**

Accessible Parking needs to be provided within the site as per the PVAGC, which requires a rate of 3% of the applicable parking spaces are to be suitable for disabled parking. This requirement does not apply to any of the residential parking or visitor parking for houses or townhouses, as these spaces are the subject to the adaptable housing requirements. As such, a total of 12 parking spaces are required to be suitable for this use. At present, 10 accessible parking spaces have been allowed, meaning an additional 2 spaces are required to comply with PVAGC. Given that there are 9 public parking spaces available during the peak hour, and standard parking spaces can be converted into accessible parking spaces at a rate of 3:2, it is expected that 2 additional accessible parking spaces can be provided while still maintaining suitable parking requirements.

The PVAGC states that parking for motorcycles must be provided at a rate of 3% with a minimum provision of 1 motorcycle parking space within a carpark with 30 or more car spaces. For residential parking on site, each dwelling has been allowed dedicated parking spaces which could be utilised for storing either a car or a motorcycle. As such, no dedicated motorcycle parking is deemed as required in addition to the current proposed parking spaces. For non-residential parking, the parking allowance of 3% was used and 12 motorcycle parking spaces are required in the development.

Provision for bicycle parking has been made within the Precinct in accordance with the required rates (subject to Design and Siting Development Applications).

### 3.7 Proposed Land Tenure

A Community Title Plan is included as part of this submission.

As shown on this plan, various land tenure schemes are proposed as part of this EDP DA submission, including

- Separate title individual Crown Leases (blocks c-y Section D, and blocks a-q Section A);
- Unit titled buildings contained within a Community Title Scheme (Precincts 1, 2, 4, 5, 6, 8, and 9);
- Three dimensional subdivision (car park owned under commercial Crown Lease, residential Units Plan above), where both commercial and residential blocks are contained within a Community Title scheme (Precinct 3);
- A 99 year lease for the Heritage Core; and
- The two parks and other lands as shown on the Community Title Plan (blue hatch in **Figure 4**) will be held as communal land that is contained within a Community Title Scheme (which will be subject to a holding lease). Communal land will remain accessible to the public via way of access easements in future Crown Lease/s where required.

The lands identified as ACT Government Area (orange hatch in **Figure 4**) are lands within the estate boundary that are proposed to be handed back to the Territory. These include main access routes, an edge road, shared paths, and associated open space.

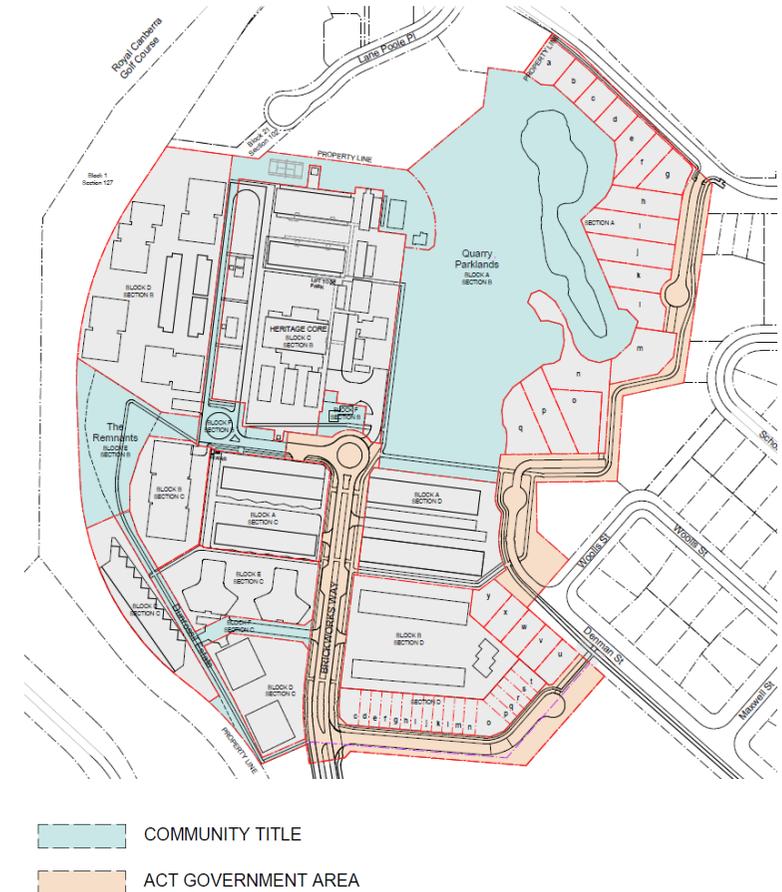


Figure 4: Extract from the Community Title Plan (SJB, 2023)

# 4

## Submission Strategy and Applicable Codes

It is important to note that this submission is for the EDP DA only. The following is the order of submissions for this project:

- a) The Estate Development Plan DA – this DA also covers the proposed community title lands (including parks and access streets/paths)
- b) The Heritage Core DA
- c) Precinct 1 (to the west of Heritage core)
- d) Precinct 3 (to the south of Heritage core)
- e) Other remaining Single Dwelling and Multi-Unit Dwelling DAs to be submitted in the future.

The following list has been provided addressing the EDP DA submission only and the Design and Siting of the buildings are subject to the Heritage Core Area DA and other subsequent DAs.

Planning Control	Relevance
<b>National Capital Plan</b>	
National Capital Plan	Not relevant as no planning controls apply from the NCP.
<b>Precinct Map and Codes</b>	
Yarralumla Precinct Map and Code	Relevant, see <b>Attachment A</b>
<b>Development Codes</b>	
Estate Development Code	Relevant, see <b>Attachment A</b>
Commercial Zones Development Code	Relevant, see <b>Attachment A</b>
Single Dwelling Housing Development Code	Relevant, see <b>Attachment A</b>
Multi Unit Housing Development Code	Relevant, see <b>Attachment A</b>
<b>General Codes</b>	
Residential Boundary Fences General Code	Relevant, see <b>Attachment A</b>

Crime Prevention through Environmental Design General Code	Relevant, see <b>Attachment A</b>
Waterways: Water Sensitive Urban Design General Code	Relevant, see <b>Attachment A</b>
Parking and Vehicular Access General Code	Relevant, see <b>Attachment A</b>

---

The list of documents submitted with this application has been provided separately for convenience.

# 5

## ACT Planning Policies

### 5.1 ACT Planning Strategy 2018

The nine Strategies and five Outcomes of the ACT Planning Strategy 2018 have been considered in preparation of this proposal as addressed below.

#### Outcomes for 2030

The ACT Planning Strategy intends to establish how the territory will develop into the future to meet the aspirations of the people and the environmental, social, and economic challenges of the 21<sup>st</sup> century. The strategy outlines five outcomes to be achieved by 2030 and nine strategies to achieve them.

Outcome	Response
In 2030 Canberra will be a city that makes it easy for people to make more sustainable living choices and has the resourcefulness and capacity to manage change.	The proposal contributes to the delivery of new and greater housing choices close to existing transport, employment, and services through urban intensification.
In 2030 Canberra will be a city where everyone can take advantage of its network of centres, open spaces, and modes of travel to enjoy a sense of wellbeing and participate in a vibrant civic and cultural life.	The proposal provides for better integration between planning and transport by providing population density within established urban areas.
In 2030 Canberra will be at the centre of an innovative, prosperous region that has established a diverse 'clean' economy and has a wide choice in jobs and lifestyles.	The proposal facilitates a living option in close proximity to major employment and retail centres to encourage contribution to the local economy. The proposal also provides employment opportunities on-site through revitalisation of the heritage core with various commercial uses.
In 2030 Canberra will be the 'capital in the bush', recognised for the quality of its public places and buildings that reflect its unique climate, character and identity.	Proposal provides urban intensification which results in better opportunity to retain open spaces while catering for increased population. The amount of open space retained on site contributes to retaining the 'bush capital' character of Canberra.
In 2030 Canberra will be at the centre of a region that demonstrates the benefits of good stewardship of the land, its resources and the beauty of its rivers, mountains and plains.	Urban infill projects of this nature result in more efficient use of the ACT's limited land resources. Also, the proposed landscaping works and open spaces are consistent with the envisioned outcome under this strategy.

## Strategies and Actions

The proposal is supportive of a number of the nine strategies presented in the ACT Planning Strategy. By providing appropriately located urban intensification within established urban areas with access to public transport and existing road infrastructure, the proposal provides for housing choice in an appropriate location.

Strategy / Action	Response
Create a more compact, efficient city by focusing urban intensification in town centres, around group centres and along the major public transport routes, and balancing where greenfield expansion occurs.	The proposal is for the redevelopment of a centrally located urban site in proximity to public transport existing road infrastructure, which directly contributes to creating a more compact and efficient city. The proposed mixed-use nature of the site will further support the creation of a compact and efficient city.
Improve everyone's mobility and choice of convenient travel by integrating the design and investment of the various networks and transport systems with the land uses they serve.	The site is located adjoining established pedestrian and cycle networks and existing bus routes, providing convenient opportunities for future residents to adopt active travel modes. The proposed shared paths on site will connect to the existing active travel network in the locality.
Provide more cost effective and sustainable living options by improving the existing housing stock and establishing more choice in housing types in a variety of locations.	The proposal offers cost effective and sustainable living options and greater housing choices in Yarralumla.
Ensure everyone has convenient access to a range of facilities, services and opportunities for social interaction by reinforcing the role of group and local centres as community hubs.	The subject site is located within a short distance of the Yarralumla Local Centre (circa 300 metres to the east of the site). Also, the proposed revitalised heritage core together with the proposed open spaces would provide a range of facilities, services, and opportunities for social interaction.
Provide vibrant, pleasant urban parks and places for everyone to enjoy by ensuring they are safe and accessible for the most vulnerable in our community.	The proposal incorporates large open space areas that are designed to be accessible for all users.
Invest in design that will ensure urban change creates amenity, diversity, a more sustainable built form and adds to Canberra's landscape setting.	The proposal promotes urban change and an innovative collection of housing typologies, commercial spaces within a revitalised heritage core, and a network of open space that create amenity and diversity while contributing to a more sustainable built form for Canberra.

## 5.2 ACT Climate Change Strategy 2019-2025

This Strategy outlines the next stage of the ACT Government’s climate change response and identifies actions to meet certain targets and prepare for climate change. The actions have been developed with the community and stakeholders and are focused on:

- meeting the 2025 target
- building resilience to climate change impacts
- ensuring we don’t ‘lock in’ future emissions
- laying the foundations for achieving net zero emissions.

This strategy replaces the previous Climate Change Strategy and Action Plan 2 (2012) and the Climate Change Adaptation Strategy (2016) and is complemented by Canberra’s Living Infrastructure Plan: Cooling the City, which sets the direction for maintaining and enhancing trees, soils and waterways to keep our city cool, healthy, and liveable in a changing climate. The Strategy builds on successful initiatives including Canberra’s transition to 100% renewable electricity, the Actsmart program and Energy Efficiency Improvement Scheme, the construction of Canberra’s first light rail line, the City’s growing cycle path network, and the improving knowledge of potential vulnerabilities to climate change impacts.

Relevant to this EDP is the adoption of recommended Actions to 2025, relating to Transport and Urban Development. A response to this part of the Strategy is provided below.

### Actions to 2025 - key relevant actions

Matter	Response
<b>3. Transport</b>	
3B Plan for a compact and efficient city	The estate makes use of a key urban infill site to support residential development in a location well serviced by public transport, employment, community and retail services to reduce the urban footprint of development.
3C Increase use of public transport	The estate supports the increased use of public transport through its integration with pedestrian networks that connect to the existing bus routes that service Yarralumla.
3D Encourage active travel	The estate encourages active travel by providing pedestrian and cyclist infrastructure that integrates with the broader network across South Canberra.
3E Reduce car use	The estate supports reduced car use due to its location within Central Canberra. This will assist in the reduction of greenhouse gas emissions through reduced commuting distances.
3F Smarter use of roads	The estate supports smarter use of roads to limit the amount of paved area, including the incorporation of shared zones and driveway areas to create a pedestrian oriented environment.

#### 4 Energy, Building and Urban Development

4G Climate-wise, zero emissions buildings	The estate will support the development of climate wise buildings including the siting of buildings to achieve solar passive design, and the adaptive reuse of existing Brickworks buildings located on the site.
4H Climate-wise built environment	The estate has been designed to achieve an integrated public realm and development outcome that will facilitate the creation of a climate wise built environment across the Brickworks Precinct through the development of the Master Plan and Landscape Master Plan. Refer to the Design Report included in this submission.
4I Reduce urban heat and improve liveability	The estate incorporates extensive tree planting and soft landscaping to mitigate the impacts of urban heat islands and provide thermal comfort for residents and surrounding areas, support liveability outcomes.

The estate design supports the achievement of the above actions to allow future occupants to respond to the challenges of a changing climate.

# 6

## Yarralumla Neighbourhood Plan

The Yarralumla Neighbourhood Plan (**the Plan**) was prepared by the ACT Planning and Land Authority in 2004. The Plan sought to outline the future character of the suburb of Yarralumla, whilst protecting and enhancing existing valued features. Specifically, the Plan provided planning strategies for five key areas:

- Yarralumla Local Centre
- Residential Areas
- Urban Open Space
- Community Facilities
- Movement Networks
- **The Yarralumla Brickworks**

### 6.1 The Yarralumla Brickworks

The Plan was prepared prior to preparation of a CMP for the Yarralumla Brickworks Precinct (the Plan notes the CMP was being prepared for the site at that time) and initially it was the intent of the government to limit the additional housing for the precinct to 25 dwellings. The Government have since revised their policy for the precinct, having consideration for the increasing population of the ACT and the need to provide sustainable housing.

Since then a CMP has been prepared and then revised for the precinct that looks at the requirements for the development of the site considering its values (please refer to the heritage documentation included in the EIS for further information).

The proposed EDP is consistent with the requirements of the CMP.

# 7 Attachments

**Attachment A – YARR102001 Brickworks EDP SARC**



**Attachment B – Stormwater Treatment Systems**



**Attachment C – Traffic and Parking Report**



**Attachment E – EDP DA - Response to Agency Comments**

---

**Attachment H – Bushfire Risk Assessment Report**



**Attachment R – Single Dwelling Block Compliance Assessment**



**Attachment S – Community Consultation Summary Report**



**Attachment T – Design Intentions Report**



**Attachment U – Proposed Planning Controls - Yarralumla Precinct Code**



**Attachment AR – Canberra Brickworks Precinct Environmental Impact Assessment**



**Attachment AS - Interpretation Strategy**



**Attachment AT – Waste Overview**



**Attachment AV – Assessment of the Stability of the Batter Faces of the Former Quarry**