



Our ref: 10/04700

Mr David Collett  
Director Asset Management Branch  
Department of Disability, Housing and Community Services  
Nature Conservation House  
Cnr Benjamin Way and Emu Bank  
Belconnen ACT 2617

  
Dear Mr Collett

**Scoping advice for the preparation of a planning report for the proposed redevelopment of Braddon sections 52 and 57 and Reid section 7**

I refer to your letter of 23 February 2010 on behalf of the Commissioner for Social Housing requesting that the ACT Planning and Land Authority (ACTPLA) consider initiating a draft variation to the Territory Plan for Braddon section 52 and section 57 blocks 1, 4 and 7 and Reid section 7. I note that ACTPLA received, with your letter, advice from the Archdiocese of Canberra and Goulburn, as the lessee of Braddon section 57 supporting the progression of a draft variation to their land.

As you are aware ACTPLA requires further information about the proposal in the form of a planning report before a decision is made to proceed with a draft variation to the Territory Plan. A significant amount of work has already been undertaken by consultants on your behalf in preparing the concept master plan that accompanied your letter, which will assist with the preparation of the planning report. The planning report is required to be in the format and address the issues listed in the scoping document (see **Attachment A**). It is requested that extensive public consultation be undertaken as part of the preparation of the planning report.

Under schedule 4 of the *Planning and Development Act 2007* (the Act) an application to remove the concessional status of a lease triggers an EIS to consider the social impact of this change. It should be noted that the loss of the CFZ land in the city is a separate matter for consideration as part of the planning report. As you are aware section 211 of the Act makes provision for the Planning Minister to exempt a development application from the requirement to include an EIS if it is determined the environmental impact of the proposal has been sufficiently addressed by another study. You have indicated an intention to address all issues, including environmental and social impact associated with the removal of the concessional status of the lease over Braddon section 57 in this planning report. While the scoping document includes the need to address the impact of the loss of CFZ land, I am unable to provide you with confirmation that an as yet unseen assessment of these issues would be sufficient to qualify for an exemption under section 211 of the Act.

The Conservator of Flora and Fauna has confirmed that a tree survey of the site needs to be completed and the impact on trees at the site is required to be addressed in the planning report.

If the site is redeveloped as outlined in the concept master plan, then the development is likely to have a significant impact on traffic in the city area. It is thus important that the traffic impact assessment for the redevelopment withstand scrutiny. I enclose the comments ACTPLA received on the traffic impact assessment from the Transport Planning and Strategy Section in the Department of Territory and Municipal Services (see **Attachment B**).

As you are aware the ACT Heritage Council has received nominations for Allawah and Bega Flats on part of section 52 Braddon and section 7 Reid to the ACT Heritage Register. I have included for your information a copy of the Council's advice on the status of its assessment of the heritage values of Allawah and Bega Flats at **Attachment C**.

Please note that at the time of lodgement of the planning report with ACTPLA, a minimum of 18 copies of the report including appendices (16 paper copies and 2 DVD copies—where one DVD copy is to be complete and the second is to include the appendices separately) is required for circulation to agencies.

If you wish to discuss this matter further please contact Mr Garrick Calnan, Manager Development Policy Section on 6207 2892.

Yours sincerely



Neil Savery  
Chief Planning Executive

19 April 2010

Encl.

## SCOPING ADVICE FOR THE PREPARATION OF A PLANNING REPORT FOR THE REDEVELOPMENT OF BRADDON SECTION 52 AND 57, REID SECTION 7

### PLANNING REPORT FORMAT AND ISSUES TO BE ADDRESSED

**Cover Page** (a two or three line description of proposal, date of preparation of document, name of organisation that prepared the document and name of proponent)

**Executive summary** (provide a non-technical summary of the planning report including key findings and recommendations)

#### 1. Introduction

Proposal background and need

- ◆ Name and address of proposal's initiator and all parties/lessees involved
- ◆ Description of the proposal (intended purpose, type and form of development)
  - *Location of land (precise description including map and aerial photograph)*
  - *Existing use of site and surrounding development/use details*
  - *Land tenure and administrative responsibilities (including any lease conditions/concessional status, custodianship)*
  - *Details of any direct grant requests*
  - *Brief description of proposal*
- ◆ Alternatives considered
  - *Description of alternatives considered including the 'do nothing' case*

#### 2. Planning policy context

Details of existing policy framework including:

- ◆ National Capital Plan – Ainslie Avenue is a designated area though the adjoining land is not subject to special requirements
- ◆ Assessment against the Statement of Strategic Directions in the Territory Plan
- ◆ Strategic Policy documents including the Spatial Plan and the Sustainable Transport Plan/Statement of Planning Intent
- ◆ Neighbourhood Plans (if applicable)
- ◆ Master Plans (if applicable)
- ◆ Other applicable studies/guidelines/publications including proposed development on adjacent sites (e.g. City section 96)
- ◆ Existing Heritage requirements

### 3. Site constraints and opportunities for site as a whole

#### *Physical*

- ◆ Physical infrastructure, including
  - *traffic/cycling/parking study*
    - transport planning section of TAMS has requested additional work on the Traffic Impact Assessment study (see **Attachment B**)
    - public transport access
    - pedestrian/cycle network links to local schools (Ainslie Primary School)
  - *sewerage and stormwater*
  - *water, gas and electricity*
  - *telecommunications*
- ◆ Hazards and site contamination
  - *EPA has requested that a contamination assessment report be completed*
- ◆ Topography

#### *Social*

- ◆ on Braddon section 52 and Reid section 7
  - *census of student accommodation*
  - *number and composition (bedrooms) of public/social housing*
  - *ancillary uses – community activity centre, shop, etc.*
- ◆ on Braddon section 57
  - *description of uses – place of worship, offices administration, ancillary retail use, accommodation, and other ancillary uses*
- ◆ Community, recreation and sporting facilities
- ◆ Proximity to commercial/retail and community facilities
- ◆ Urban amenity including
  - *noise (in addition of traffic noise from Cooyong Street, the northern end of the site is adjacent to an existing licensed club and entertainment precincts)*
  - *safety*
  - *light spill impacts*
  - *odour*
- ◆ Visual assessment, urban design/ streetscape character, sunlight and shade
- ◆ Cultural and Heritage, including natural, Aboriginal and European
  - *ACT Heritage Council has provided advice about an assessment of heritage values of Allawah and Bega Flats (see **Attachment C**)*
  - *interface with Gorman House*

#### *Environment*

- ◆ Open space networks and connections
- ◆ Ecological (urban ecology)
- ◆ Landscape characteristics
- ◆ Flora and Fauna
  - *Conservator of Flora and Fauna has requested a tree survey be completed*

#### 4. Strategic context and alternative development options

- ◆ Community social profile of the general area
  - *social demographic information – profile of residents in surrounding suburbs*
  - *profile of city workers including employment distribution and opportunities*
  - *social infrastructure including health facilities, recreation facilities, cultural diversity, community lifestyle, local community organisations, etc.*
  - *physical infrastructure – housing, transportation etc*
  - *economic profile of city region – economic base and business activity including projected employment growth, local and regional economic trends*
- ◆ Estimated catchments and distribution analysis of existing uses and facilities
- ◆ Development demands and trends
  - *various mixes of dwelling sizes including the impact of a high proportion of 3 bedroom and more dwellings, excluding expensive apartments and penthouses (as developments primarily comprised of 1 and 2 bedroom units are not conducive to the provision of housing choice and the achievement of socially-mixed communities)*
- ◆ Viability of retaining existing uses
- ◆ Alternative development options
  - Description of alternative development options considered as part of this proposal

#### 5. Proposed use

- ◆ Description of proposal – land uses, building form and bulk, urban design, site layout and access, response to sustainability issues including solar access, water sensitive urban design, waste minimisation, landscaping, and consideration of crime prevention through environmental design
- ◆ Proposed lease and tenure arrangements, including necessary lease variations
- ◆ Proposed changes to the Territory Plan and any site specific planning controls
- ◆ Proposed implementation timeframes / staging of development
- ◆ Proposed balance of uses
  - *composition of dwellings*
  - *proportion of public housing*
- ◆ Contextual links

#### 6. Detailed impact assessment

- ◆ Provide an assessment of the proposal in relation to any disadvantage to the community resulting from full implementation
- ◆ Detailed review of social impacts
  - *Impacts of loss/relocation of community services and facilities on Braddon section 57*
  - *impacts of loss/relocation of student accommodation from the City*
  - *population change including changes to resident / dwelling composition / size*
  - *needs of social groups including people with a disability*
  - *interaction between future development and existing community*
  - *describe the level of community support for the proposal*
  - *a description and rationale of the overall net community benefit*
  - *provide an analysis of the proposal in relation to any disadvantage to the community including any mitigation measures to address any disadvantages*

- ◆ Detailed review of economic impacts
  - *describe the economic environment that may be affected by the proposal*
  - *assess the potential for significant impacts on economic well being of local and regional area and key sectors, and any flow on impacts*
  - *describe the planned use of monies gained from the development*
  - *describe the general economic benefits/costs from the proposal*
- ◆ Assessment of impacts on the physical environment
  - *engineering services including diversion of existing services, and upgrading of water, sewer and electrical services*
  - *traffic, cyclists, pedestrians and parking*
- ◆ Detailed review of environmental impacts
  - *loss of trees shown in the tree survey*
  - *visual impact of urban form or proposed development*
  - *changes to urban ecology*

## 7. Consultation

- ◆ The proponent must consult the following stakeholders:
  - *Lessee of Braddon section 57 blocks 1, 4 and 7– Catholic Church*
  - *International Student accommodation at Canberra Institute of Technology*
  - *University Accommodation Services at Australian National University*
  - *Existing users of the site – existing tenants, parishioners of St Patrick’s church, other user groups of CFZ land (where applicable)*
  - *National Capital Authority*
  - *ACT Heritage Council*
  - *Environmental Protection Authority*
  - *Conservator of Flora and Fauna*
  - *Transport Planning and Strategy, Territory and Municipal Services Department*
  - *ACTION, Transport and Infrastructure Division, Territory and Municipal Services Department*
  - *Canberra CBD Ltd*
- ◆ Details of consultation undertaken including notifications, formal presentations, sessions, number of attendees
- ◆ Identify public concerns and issues
- ◆ Response to issues raised
- ◆ Copies of relevant correspondence

## 8. Recommendations

## 9. Appendices

- ◆ Copies of relevant studies / guidelines / publications
- ◆ References

## **Request for input into scoping document for proposal at Braddon section 52 and 57 and Reid section 7**

Reference above project, the following comments are provided.

### **Comments on the Scoping Document**

Asset Acceptance supports the Scoping Document subject to the following:

Item 1 Background to the Proposal, the dot point 5 should read as “Land tenure arrangements (eg National Land, Un-leased Territory Land or leased land) and administrative responsibilities (eg asset management agency)

Item 3 Site Constraints and Opportunities, the dot point 2 should read as “Landscape characteristics eg vegetation/ tree survey, including verge trees and the space they require to remain healthy.

Item 3 Site Constraints and Opportunities, the dot point 3, after the words ‘eg traffic conditions’ insert the following “(paths adjacent to the proposed development are currently prone to damage from street trees and there may be an opportunity to rectify this)”, car parking.....

### **General; Comments on the report**

(1) The **Master plan Traffic Impact Assessment** ( AECOM 8 JUL 2009) shall be revised taking into consideration of the following:

- The impact due to 1200 dwellings as opposed to 1000 dwellings as mentioned in the original report.
- The final scheme for the 4-way intersections along Cooyong Street.
- Provision of on road cycling and pedestrian facilities along Cooyong Street and appropriate connection to the network in the vicinity.
- The scheme for the four-way intersections within the development site with respect to safety, through traffic etc.

(2) The AECOM report suggests that the City office rate (1 space per 100m<sup>2</sup> GFA) should apply to Braddon and Reid sites for any office uses. This rate is inappropriate for Braddon and Reid and the starting point is to be the rates set out in the Parking Code. Arguments for lower on-site provision rates will be considered when evidence is submitted.

### (3) Cycling and Pedestrian

Reference must be made to the following TAMS documents

- Main Routes network in TAMS Design Standard DS13
- Roads ACT - Draft Cycling and Pedestrian Network report prepared by Cardno Eppel Olsen.
- Verge improvements on the northern side of Cooyong Street for pedestrians.

(4) The two possible arrangements stated in the traffic report for Cooyong St/Scotts Crossing (and the one option for Cooyong St/Petrie St) intersections need further analysis and justification.

(5) Asset Acceptance would not support the removal of one of the signalised pedestrian crossings at this intersection as suggested in the report.

(6) With regards to the Sidra modelling the results have been presented in a way which could be quite misleading. Tables 4.4 and 4.5 suggest that all the signalised intersections with the exception of Cooyong St/ Ainslie Ave will operate with Level of Service A in both the am and pm peak for both options. Asset Acceptance do not think these signals are operating at Level of Service A now let alone with the additional traffic. More detailed examination of the Sidra outputs in the appendices reveals that only the main road through traffic will be operating at LoS A and side road and right turn movements will be significantly worse, D, E and even F in some cases.

(7) The report states “the most critical element of the road network in this area is the green co-ordination of traffic signals on Cooyong Street” yet nowhere does it consider what impact the proposals might have on that co-ordination.

(8) Finally the report does not make any recommendations.



**ACT Heritage Council**

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Contact: Can Ercan  
Phone: 6207 2208  
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Mr Justin McEvoy  
Senior Planner  
ACTPLA  
GPO Box 1908  
CANBERRA ACT 2601

Dear Mr McEvoy

**Re: Request for input into scoping document for proposal at Braddon Section 52 and 57 and Reid Section 7**

I refer to your email requesting our comments on the proposed scoping document for a proposal at Braddon Section 52 and 57 and Reid Section 7. These blocks include the Allawah and Bega Flats which are nominated to the ACT Heritage Register.

The Heritage Council has not considered the nomination and thus the heritage values of the subject buildings have not been determined. The Council therefore can not as yet provide final advice about the impact of works on heritage values. It notes the Preliminary Heritage Assessment and Impact Statement (Freeman 2009), but the research supporting the preliminary assessment is relatively slight, and does not form a substantial enough basis for Council to support or reject its conclusions or to come to a decision on heritage listing.

It should be noted that the ACT Heritage Council has requested that a comparative assessment of public housing in ACT be prepared by ACT Housing, which would assist the Council in its assessment. This study has not yet been received by the Council.

The Heritage Council points out that ACT Housing could request an urgent decision on the nomination under s29 of the Heritage Act, the \$3366 fee enabling the Heritage Unit to undertake further research on the nomination to support an assessment by the Council.

Yours sincerely

Gerhard Zatschler  
Secretary  
ACT HERITAGE COUNCIL

22 March, 2010