



Australian Government
National Capital Authority

CONSULTATION REPORT

**National Capital Plan Draft Amendment 97 - Block 7 Section 4
Yarralumla (former Australian Forestry School)**

February 2024

Contents

1. Introduction	1
1.1 Purpose and background	1
2. Consultation	1
2.1 Consultation activities.....	1
2.2 Submissions received.....	3
3. Key Issues	4
3.1 Key issues raised in objections to the draft amendment	4
3.1.1 Traffic, parking and public transport	4
3.1.2 Heritage and history.....	6
3.1.3 Landscaping.....	6
3.1.4 Building height and setbacks	7
3.1.5 Other matters	8
3.2 Support for proposed development	10
4. Changes to the draft amendment.....	10
5. Conclusion.....	10
6. Attachments.....	10
Attachment A: Notice of release of Draft Amendment 97 for public comment published in The Canberra Times.....	11
Attachment B: Notice of release of Draft Amendment 97 for public comment published as a Gazette Notice on the Federal Register of Legislation.....	12
Attachment C: Summary of submissions	13
Attachment D: Detailed response to traffic issues raised in submissions.....	78

1. Introduction

1.1 Purpose and background

This report summarises the issues raised during the public consultation process undertaken by the National Capital Authority (NCA) on National Capital Plan Draft Amendment 97 - Block 7 Section 4 Yarralumla (former Australian Forestry School) (DA97).

Block 7 Section 4 Yarralumla (the site) is a crescent-shaped parcel of land, around 10.9 hectares in size, located on the western edge of the suburb of Yarralumla. The site abuts the Royal Canberra Golf Club and is in close proximity to the Yarralumla shops. Within the crescent formed by the site is an outdoor oval managed by the ACT Government and available for public recreation. The Old Canberra Brickworks, to be redeveloped predominantly for residential purposes, is located to the south-west of the site.

Block 7 Section 4 Yarralumla (the site) is owned by Gunyar Pty Ltd (Gunyar) as trustee for the Gunyar ACT Properties Trust. The Shepherd Foundation is a charitable institution that supports children with hearing loss learn to listen and speak, and is beneficiary of the Trust.

On 1 April 2021, Oakstand Pty Ltd (Oakstand) of behalf of Gunyar advised the NCA that they would seek an amendment to the National Capital Plan (NCP) to change the land use policy of Block 7 Section 4 Yarralumla to allow for a mix of uses on the site. The NCA conducted an initial community engagement process to seek the views of key stakeholders and gauge initial community views on the redevelopment proposal, throughout August and September 2021.

In October 2021, the NCA Board considered the outcomes of the initial community engagement process. As a result of this consideration, the proponent was invited to present a revised scheme that reduced the building scale to that which was consistent with nearby developments (the old Canberra Brickworks). The proponent was also asked to reconsider the mix of land uses.

In May 2022, the proponent submitted a revised development proposition and request to amend the Plan. The plans submitted at this time showed development limited to not more than 3 storeys (plus attic), consistent with the direction provided by the NCA.

In October 2022, the NCA Board agreed that a draft amendment to the Plan could be prepared for Block 7 Section 4 Yarralumla to:

- amend the land use from Community Facility to a mixed-use policy permitting residential commercial accommodation, community facility, and ancillary commercial uses
- introduce detailed conditions of planning, design and development for the site including limiting building heights to no greater than 3 storeys plus attic and applying maximum limits on ancillary commercial and accommodation uses.

In June 2023, representatives of the Yarralumla Residents Association (YRA) presented to the NCA Board their views concerning the proposed redevelopment of the site. Oakstand subsequently presented to the NCA Board at their meeting in August 2023 to address concerns of the YRA.

In October 2023, the NCA Board agreed to release DA97 for public consultation.

2. Consultation

2.1 Consultation activities

On 11 November 2023, the NCA released DA97 for public comment. The community engagement period ran for a period of 6 weeks, concluding on 22 December 2023. DA97 and supporting material was

available on the NCA website during the consultation period and hard copies of all documentation was available for review at public information sessions.

Key activities during the consultation period of DA97 included:

- On 11 November 2023, a notice was published in *The Canberra Times* ([Attachment A](#)).
- On 11 November 2023, content was published on the NCA's website. This included frequently asked questions, the draft amendment, and supporting technical reports.
- On 13 November 2023, the NCA referred DA97 to the ACT Government's Environment, Planning and Sustainable Development Directorate (EPSDD) in accordance with section 15(1) of the *Australian Capital Territory (Planning and Land Management) Act 1988*.
- On 14 November 2023, a notice was published on the *Federal Register of Legislation* ([Attachment B](#)).
- On 11 and 18 November 2023, posts were made on social media (X and Facebook). These posts advised that public consultation was underway, and provided details of the public information sessions.
- On 13 November 2023, the NCA referred DA97 to the following stakeholders:
 - Department of Finance
 - Inner South Canberra Community Council
 - Yarralumla Residents' Association
 - National Trust ACT
 - Friends of ACT Trees
 - Conservation Council ACT Region Inc.
 - Royal Canberra Golf Club
 - Institute of Foresters
 - Planning Institute of Australia
 - Australian Institute of Architects
 - Housing Industry Association
 - Australian Institute of Landscape Architects
 - Greater Canberra
 - Westridge House owners
- On 17 November 2023, the Office of Impact Analysis advised that no Regulation Impact Statement would be required for DA97.
- On 25 and 29 November 2023, the NCA hosted public 'drop in' sessions at Forestry House in Yarralumla. Twelve members of the public attended the session on 25 November, 10 members of the public attended the session on 29 November.

- On 19 December 2023, EPSDD responded to the draft amendment and did not object to DA97 proceeding.

2.2 Submissions received

Twenty submissions were received in response to DA97, with submissions provided by individuals, community groups, and government entities. The key issues raised in the public consultation period are summarised in Section 3 of this report. Details of submissions are available in [Attachment C](#).

Of the 20 submissions received, 11 objected to DA97. Five submissions supported or largely supported DA95, while 4 submissions were neutral or contained mixed views.

ACT Government

The ACT Government has advised that it is pleased that the NCA has considered and responded to the initial views expressed by the ACT Government in 2021 regarding the site redevelopment proposal, and also undertaken further consultation with stakeholders. The proposal was circulated to other ACT Government agencies and comments are summarised in the correspondence:

The ACT Education Directorate will require as redevelopment of the site proceeds, details of the quantum and structure type of dwellings planned. This will support the ACT Education Directorate's school planning for Yarralumla and surrounds.

The ACT Heritage Council recommends that the significant features of the place, as registered on the Commonwealth Heritage List, are retained, and conserved, as part of this National Capital amendment and the proposed redevelopment.

Transport Canberra and City Services Directorate (TCCS) notes that the masterplan is designed to allow high-quality pedestrian / bicycle paths and connection to the Brickworks, by facilitating a new shared path on the western side of Banks Street between Bentham Street and Brown Street, and the western side of Wilf Crane Crescent. TCCS is supportive of these connections being carried forward as part of an overall active travel network that links the development with the surrounding neighbourhood and that the connections be further developed as off-site works when the proposed amendment progresses to any development applications.

The proposed development is expected to have a moderate and manageable impact onto the surrounding road network.

In terms of car parking, TCCS notes the intentions to deliver on-site parking that aligns with the equivalent Territory Plan requirements including a mix of surface-level and sub-terranean-level car parking for residents, visitors, and employees. It is understood that the final car parking numbers are anticipated to be determined at the works approval stage of any future development. TCCS requests further engagement with the NCA in addressing this aspect of the project and TCCS may seek further details during the works approval stage to ensure that the specifics of the parking arrangements are also compatible with any existing parking in the public domain.

Icon Water has the following comment to make:

- The proposed Option 2 augmentations of the existing sewer network capacity is acceptable to deliver the additional sewer flow.
- Existing water infrastructure within block boundary is not sufficient to service proposed development. A new network will be required and the development might trigger augmentation to the existing reticulation network. Detailed analysis will be required once further development information becomes available.

- No deviation from Icon Water standard is supported as part of this application. The development will need to ensure all necessary relocations and protection is undertaken for all Icon Water assets per the relevant standards.

Other Government stakeholders either had no comment, no objection, feedback that related to matters at development application or works approval stage or indicated support for the proposed draft amendment.

3. Key Issues

This section identifies the key issues raised during the consultation process. It identifies the themes raised in objections to the proposal, but also summarises the support received in response to the draft amendment.

3.1 Key issues raised in objections to the draft amendment

3.1.1 Traffic, parking and public transport

Comments received

Of those the submitters who objected to DA97 many raised concerns about traffic generation from future development and the impact of this traffic on the local area. Some submitters highlighted that there will be several large developments occurring over the coming years, such as redevelopment of the Brickworks and Minimbah Court, and expressed concern about the cumulative impact of these developments on Yarralumla. Submitters provided the following views to highlight their concerns about traffic:

- the site's only access is via Wilf Crane Crescent, and movement could be improved by shifting the northern arm of this road further south
- the inability of the adjacent roads of Bentham Street at the Yarralumla shops and Weston Street to carry the additional traffic due to local constraints has not been recognised
- the draft master plan allows for a maximum of 300 dwellings, and this combined with other permitted uses could lead to vehicle movements per day in excess of the estimated volumes provided for in the Transport Impact Assessment
- traffic flow from the commercial components of the development onto local streets needs to be better understood, including how signage to the proposed hotel development may influence traffic flow from Adelaide Avenue
- the traffic model includes the Mint interchange upgrade works, however the construction timeframe for this is unknown at this stage and may not occur at all
- the impact of vehicles during construction as well as service vehicles for the Aged Care facility does not appear fully understood or accounted for
- lights, noise and congestion from vehicles will affect existing residences and impact on pedestrian safety
- there is inadequate provision for onsite parking, particularly for the commercial components of the development which may result in roadside parking in adjacent streets.

Concerns about parking and public transport included the following:

- parking on Bentham Street is expected to increase due to the development of the Brickworks since public parking within the Brickworks development will be commercially operated
- parking at the Yarralumla shops is already difficult and that traffic impacts at the shops will be exacerbated, particularly if the current bus route through Yarralumla is diverted past the shops in the future
- adequate parking must be provided for the hotel, visitors and those using the oval.

Suggestions were made that traffic impacts could be addressed by limiting the scale of development, setting conditions on traffic movements and providing alternative access to the site.

One submission sought a reduction in on-site parking requirements to help support reduced car use.

NCA response

A Transport Impact Assessment was completed by Stantec Australia Pty Ltd (Stantec) to assess the expected transport implications of development of the site. This assessment has been reviewed by the ACT Government's Transport Canberra and City Services Directorate (TCCS) and concluded that *'the proposed development is expected to have a moderate and manageable impact onto the surrounding road network'*.

A detailed response from Stantec to traffic matters raised in submissions is provided at [Attachment D](#).

Parking is to be generally in accordance with ACT Government requirements, including in relation to cars, motorcycles and bicycles. The current Technical Specifications for various zones under the Territory Plan include both an 'assessment outcome' and more detailed specifications. The key consideration is the assessment outcome, which require sufficient parking to cater for a development to be provided, while minimising visual impacts, vehicle manoeuvrability and access. These requirements provide some flexibility in terms of the number of car parking spaces to be provided and will be considered on a case-by-case basis by the NCA.

Specific parking proposals (including quantum of parking spaces and location), together with updated traffic reports for detailed proposals, will need to be submitted to the NCA as part of the Works Approval process.

TCCS have advised the proponent that parking utilisation at the Yarralumla Shops is surveyed annually by TCCS. The 2023 parking utilisation rate averaged 80% and TCCS have advised that this is acceptable for this location. Ongoing operation and configuration of the parking at the shops is not within the scope of the draft amendment.

Any proposal to realign or adjust the location of Wilf Crane Crescent will be subject to detailed design. The EPBC Act approval incorporates a number of requirements which includes the preservation of the heritage listed Forestry building. Consideration of widening Wilf Crane Crescent will also form part of the detailed design of any future development. These matters will be included as part of future Works Approvals which will be publicly notified in accordance with the NCA requirements.

TCCS have noted the intentions to deliver on-site parking aligned with Territory Plan requirements, and the potential for a mix of surface level and subterranean parking for residents, visitors and employees. Final car parking numbers will be determined at the Works Approval stage, and TCCS have requested further engagement to address parking requirements and potential impacts on the public domain. The NCA will ensure that this engagement occurs as part of future planning processes.

The reduction in car parking requirements as suggested could lead to more on street parking on site as well as adjoining streets resulting in traffic congestion and loss of amenity to existing residents.

3.1.2 Heritage and history

Comments received

Several submitters raised concerns about the impact of development on heritage values of the site, the long term management of heritage assets, and general protections afforded to the site. Comments received included:

- there is no provision for the long-term management, maintenance and funding of the heritage values of the site as a whole after completion particularly the heritage tree plantings
- the Forestry School Building could be at risk due to the increased traffic owing to Wilf Crane Crescent being only 4m wide
- development on the site should be carried out in accordance recommendations set out in the *Environmental Resource Management 2021 CSIRO Yarralumla (Forestry Place) Heritage Impact Assessment* to ensure Heritage values of the site including historic, research, aesthetic, representative, technical, social and associative aspects are conserved and protected
- current heritage values of both the landscape character and buildings should receive protection under the *Heritage Act 2004 (ACT)* to ensure continued preservation of historic buildings and its settings.

NCA response

In May 2021, the site lessee referred the proposal to redevelop the site to the Department of Climate Change, Energy, the Environment and Water (DCCEEW) under the *Environment Protection and Biodiversity Conservation Act (EPBC Act) 1999* (EPBC Act). In April 2023, following DCCEEW's assessment process, the proposed action to redevelop the site was approved with conditions.

The EPBC Act approval (refer to EPBC ref 2021/8937) contains all conditions covering Commonwealth Heritage Listed Places, Significant Heritage Listed Trees, Interpretive Signage and Photographic Archival Recording for redevelopment of the site in accordance with the master plan, land uses and detailed conditions specified DV97.

The ERM 7 recommendations regarding preservation of heritage buildings and trees on the site are incorporated in the EPBC Act Approval.

Development proposals must meet both the requirements of the Plan and the EPBC Act approval. Detailed heritage requirements do not need to be replicated in the Plan.

Whilst the site remains National Land, the provisions of the *Heritage Act 2004 (ACT)* will not apply. The EPBC Act approval requires renomination of the completed development for listing on the Commonwealth Heritage Register to ensure ongoing preservation of Commonwealth Heritage values. Should the site become National Land, the EPBC Act approval requires nomination to another suitable list or register (agreed by DCCEEW).

Any proposal to realign or adjust the location of Wilf Crane Crescent will be subject to detailed design. The EPBC Act approval incorporates a number of requirements which includes the preservation of the heritage listed Forestry building. Consideration of widening Wilf Crane Crescent will also form part of the detailed design of any future development. These matters will be included as part of future Works Approvals which will be publicly notified in accordance with the NCA requirements.

3.1.3 Landscaping

Comments received

Many submitters noted the current landscape character of the site, including buildings nestled within the land scape and extensive stands of trees, and how this complements the character of Yarralumla more broadly. There was general concern about the impact of development on this character, and loss of the site's landscape setting.

More specific comments concerned:

- the potential loss of existing mature trees especially in line-of-sight areas between neighbouring properties and the planned development
- on-going maintenance of landscaping, with suggestion that this should be specified in the draft amendment (the arrangements proposed for the Canberra Brickworks redevelopment could serve as a model)
- loss of woodland on the corner of Forestry Oval which operates as a bird habitat and would not be replaced by planting for many years.

There was also support for the landscaping approach, with comment received that the trees on site had reached the end of their life. Replacement trees can be planted now to allow for sufficient growth before buildings are constructed.

NCA response

The NCA acknowledges the importance of the landscape setting of the site, and its importance to the Yarralumla community. The NCA expects (and can ensure through the Works Approval process) that the landscape character of the site is retained and enhanced through development of the site.

Key landscape provisions proposed for the site require:

- retention and strengthening of the site's landscape setting through preservation of existing trees, and promotion of new plantings
- trees planting proposals must include species that will enrich the site's beauty, provide shade and shelter, and enhance the built environment
- retention of existing trees around the perimeter of the site to the maximum extent possible
- a minimum of 60% of the site is to be set aside for open space and 45% for deep soil zones.

The EPBC approval contains all conditions covering Significant Heritage Listed Trees for redevelopment of the site in accordance with the master plan, land uses and detailed conditions specified in the Plan.

3.1.4 Building height and setbacks

Comments received

A range of views were expressed regarding building height and setbacks. Suggestions were received to both increase and decrease the building heights proposed in the draft amendment. This included a suggestion to limit building height to one or 2 storeys, whilst a suggestion was also made that 5 storeys would be more appropriate for the site to create more housing opportunities.

Some concern was also expressed that clarification should be provided regarding the way in which building heights are expressed so that buildings do not end up being of a greater scale than intended. For example, 3 storeys plus attic plus basement may effectively result in development of 5 storeys. Height limits could also be expressed in terms of metres to prevent higher buildings.

A few submitters suggested that building setbacks should be increased to 50m around the perimeter of the site, with one submission suggesting that the setback should be 80m from Banks Street in the south

of the site. This would ensure the development contributes to the natural character and landscape setting and would be consistent with the setback proposed for the north of the site.

One submitter suggested that there should be a decrease in the 80m setback requirement from Banks Street on the northern side of the development to allow for better connectivity of Banks Street and Wilf Crane Crescent.

NCA response

The setbacks proposed around the perimeter of the site are suitable for maintaining an appropriate interface with neighbouring properties and protecting visual privacy. A key intent in any proposal for the site is to limit new development to already developed areas of the site, which results in a variable setback. The proposed development of the site and associated site setbacks will not have adverse visual, acoustic, overshadowing or other amenity impacts on surrounding residential properties.

The required setbacks are from the boundary of Block 7 Section 4 Yarralumla. With the exception of Westridge House, there are no residential properties immediately adjoining the site. Bentham and Banks Streets and the reservations of these roads will provide additional separation to new development.

Required building setbacks will enable large trees to be retained, and others planted, helping to retain the existing character of the site and provide a landscape setting for future development.

In April 2021, when the NCA was first approached regarding future development of the site, the master plan proposed buildings up to 5 storeys in height. Following community engagement and NCA Board consideration, this was reduced to 3 storeys plus attic. This building height was considered a suitable balance that would allow suitable densities to be achieved for a site close to existing services and infrastructure, whilst retaining the landscape character of the site. The development footprint will enable retention of many trees on site and provide for extensive landscaping between buildings on site and to the perimeter of the site.

As a result of discussions with the Yarralumla Residents' Association (YRA) following the public consultation period, it was agreed that additional details in the drawings forming part of the draft amendment could help clarify and provide certainty to the community about setbacks and developable area of the site. The relevant drawing (what will be Figure 115 of the Plan) has been amended to reflect this.

3.1.5 Other matters

Comments received

A series of other matters were raised in submissions as follows:

- The combined new development areas of Forestry Place and Brickworks together with the ACT Government policies which allows for urban densification will not provide adequate infrastructure like roads, schools, childcare, healthcare, shopping, utilities and recreational facilities.
- Bicycle and walking paths should be linked to surrounding areas, and development of the site should be accompanied by the construction of footpaths, cycle paths, pedestrian crossings, etc, as well as reducing road speed limits. Language in the draft amendment could be strengthened concerning this issue.
- The development site could be sold and although it is understood that adherence to the conditions set out in the draft amendment will be required, the resulting development may be very different to what is proposed now.

- Other submissions questioned the status of the master plan, definitions in the draft amendment and interpretation of terms.
- Concern that access to Forestry Oval may be limited or reduced with development of Block 7 Section 4 Yarralumla.
- One submission was critical of the public consultation process.

NCA response

The ACT Government will consider infrastructure and services planning as part of normal planning processes. The ACT Government's submission to the draft amendment raised for example, the issue of school planning and requested that details of the quantum and type of dwellings to be provided on the site be provided as development proceeds. This will assist school planning for Yarralumla and surrounds.

The NCA is aware that the proponent has completed early investigations regarding the infrastructure requirements and connections to the site including water, sewer and electricity. These utilities will require upgrades as part of the development and will form part of future Works Approval applications. ACT Government agencies, including ICON water, have advised that the sewer upgrade works as proposed in an option proposed are acceptable and other utilities to the site can be provided as part of the detailed design for the development.

The draft amendment requires pedestrian and cycle links throughout the site which support convenient access to and from locations such as Forestry Oval, Yarralumla shops, and public transport. Whilst the details of off-site pedestrian and cycle paths are outside the scope of the draft amendment or the NCA's approval responsibility, the NCA is aware that the site lessee has been exploring pedestrian and cycle connections in the neighbourhood. TCCS comments included in the submission from EPSDD noted support for the current proposed active travel connections.

Should the site not be developed by the current proponent, any other developer will also be bound by the requirements as specified in the draft amendment. Whilst a development proposal by an alternative party may look different, provisions concerning building height and setback, development footprint, landscape character, etc will all apply. A referral under the EPBC Act may be required for an alternative proposal.

The site master plan included in the draft amendment is indicative, however is reflected in the development controls drawing. This, coupled with written provisions, provides some certainty around key aspects of development such as setbacks, developable area extent of open space, and building height. Refinements to the drawing (refer section 3.1.4 of this report) improve clarity of some of these conditions.

The NCA requires that any development be generally consistent with these drawings, including in respect of setbacks, area identified for building development, height limits, and retention of heritage assets. Detailed planning – such as the location of buildings, areas for soft landscaping and tree plantings, path and road networks – must all be within the parameters of both the drawings and written controls contained in the Plan. Detailed plans will be placed on public exhibition as part of the Works Approval process.

A number of definitions are provided within the Plan, for others guidance can be taken from the Territory Plan definitions or common dictionary definitions. The Plan definition of 'attic' has been amended to be consistent with the Territory Plan, and to improve understanding of what constitutes an attic.

The provisions proposed through DA97 and the master plan will not restrict or reduce access to the existing public playing field. The proposed development maintains the current availability of car parking provide on Territory land. The playing field is not part of the site and the proponent has discussed the dedication of Wilf Crane Crescent to TCCS as part of the redevelopment.

The NCA is consistently seeking to improve public consultation processes and engagement with the community. Feedback received through the consultation process will help inform future processes.

3.2 Support for proposed development

Comments received

A number of submissions expressed support for the draft amendment stating that as the population in Yarralumla ages they looking to downsize but stay in the area and within their community. Appropriate housing as well as aged care and other support facilities are therefore needed.

NCA Response

The support for the development is noted.

4. Changes to the draft amendment

As a result of discussions with the YRA following the public consultation period, it was agreed that additional details in the drawings forming part of the draft amendment could help clarify and provide certainty to the community about setbacks and developable area of the site. The relevant drawing has been amended to reflect this.

The Plan definition of 'attic' has been amended to be consistent with the Territory Plan, and to improve understanding of what constitutes an attic.

5. Conclusion

On 11 November 2023, DA97 was released for public consultation. The public consultation period ran during November and December in accordance with the NCA's commitment to Community Engagement and concluded on 22 December 2023.


Twenty written submissions were received in response to DA97, which included 2 submissions from Government entities.

Changes to DA97 as result of the public notification process are outlined in section 4 of this report.

6. Attachments

- A. Notice of release of Draft Amendment 97 for public comment published in *The Canberra Times*
- B. Notice of release of Draft Amendment 97 for public comment published in the *Commonwealth Notices Gazette*
- C. Summary of submissions
- D. Detailed response to traffic issues raised in submissions

Attachment A: Notice of release of Draft Amendment 97 for public comment published in The Canberra Times



Australian Government
National Capital Authority

**NATIONAL CAPITAL PLAN
DRAFT AMENDMENT 97**
Open for Public Consultation
**Block 7 Section 4 Yarralumla
(former Australian Forestry School)**




The National Capital Authority has released National Capital Plan Draft Amendment 97 - Block 7 Section 4 Yarralumla (DA97) for public consultation. The draft amendment can be viewed on the NCA's public consultation webpage.

The purpose of DA97 is to change the land use policy of the site from Community Facility to a mixed use zoning allowing residential, aged care, commercial accommodation, community facility and ancillary commercial uses. DA97 also proposes to introduce detailed conditions of planning and design to guide future development of the site.


Feedback welcome by close of business Friday 22 December 2023:

Email draftamendment@nca.gov.au; mail to GPO Box 373, Canberra ACT 2601; or hand deliver to Treasury Building, King Edward Terrace, Parkes ACT 2600.

All enquiries regarding DA97 can be directed to draftamendment@nca.gov.au

 [nca.gov](https://www.facebook.com/nca.gov)  [nca_gov_au](https://twitter.com/nca_gov_au)  [@nca_media](https://www.instagram.com/nca_media)
www.nca.gov.au

Attachment B: Notice of release of Draft Amendment 97 for public comment published as a Gazette Notice on the Federal Register of Legislation

	Commonwealth of Australia	Gazette
Published by the Commonwealth of Australia		GOVERNMENT NOTICES

National Capital Plan Draft Amendment 97 – Block 7 Section 4 Yarralumla (former Australian Forestry School)

The National Capital Authority (NCA) has released National Capital Plan Draft Amendment 97 – Block 7 Section 4 Yarralumla (former Australian Forestry School) (DA97) for public consultation. The draft amendment can be viewed on the NCA’s public consultation webpage.

The purpose of DA97 is to change the land use policy of Block 7 Section 4 Yarralumla from Community Facility to a mixed-use zoning allowing residential, aged care, commercial accommodation, community facility and ancillary commercial uses. DA97 also proposes to introduce detailed conditions of planning and design to guide future development of the site.

The NCA welcomes feedback on DA97 by close of business Friday 22 December 2023. Submissions can be made via email to draft.amendment@nca.gov.au, by mail to GPO Box 373, Canberra ACT 2600, or hand delivered to the Treasury Building, King Edward Terrace, Parkes ACT 2600.

Please visit the NCA’s website at www.nca.gov.au for further information about DA97, the consultation process and how to have your say.

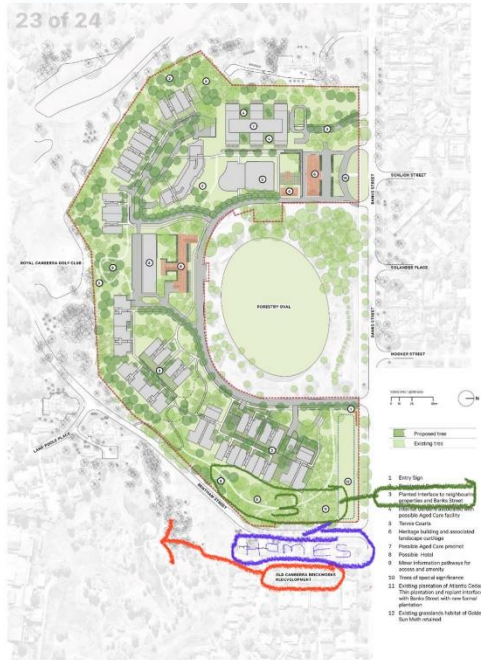
Enquiries regarding DA97 can be directed to draft.amendment@nca.gov.au.

Government Notices Gazette C2023G01190 14/11/2023

Attachment C: Summary of submissions

No.	Name	Comments
1	Kirsty Sullivan	<p>I am writing to object to your sunlight provisions for apartments in the draft Forestry plan.</p> <p style="text-align: center;">-----</p> <p>Building design must achieve the following:</p> <ul style="list-style-type: none"> • Living rooms and private open spaces of at least 70% of apartments in a building must receive a minimum of 3 hours direct sunlight between 9am and 3pm on the winter solstice (21 June). • A maximum of 15% of apartments in a building receive no direct sunlight between 9am and 3pm on the winter solstice (21 June). <p>Why are you allowing ANY apartments to have ZERO direct sunlight 9-3pm 21/06?</p> <p>This is awful for the mental health of the people living in the apartments and awful for the environment (increased heating and lighting costs). It completely contradicts your own requirement for “design excellence in architecture”.</p> <p>Please update this requirement to state that 100% of buildings must receive a minimum of 3 hours direct sunlight between 9-3pm on the winter solstice.</p> <hr/> <p>You have incorrectly labelled the existing homes on Bentham St as the Old Canberra Brickworks Development.</p> <p>You have also labelled the protective planting #3 as facing houses on Banks St, when that is in fact Bentham St.</p> <p>This has resulted in a failure to plant trees for privacy and amenity in the correct location for existing homes. Please extend area #3 to the area marked on the attached map.</p>

Figure 116: Indicative site masterplan



2

David Fenech

I am strongly supportive of the 3 storey height limit and plan in general.

Community space/ hotel:

I would like to see either the community space or proposed hotel be something practical and functional for multiple uses, for instance if it was adjacent to or at very least overlooking the cricket oval, it could provide for sports use as well as community uses. I used to be involved in a sports club that had a licenced club house at the grounds and the families that would turn out for weeknight and weekend sports would have a picnic, a social drink whilst one child played sport and the siblings ran around, and the sports club was well funded in a very strong close knit community with families who would come for Friday night picnics even if no one was playing sport, this is one way how planning can support the creation of community.

		<p>Aged care:</p> <p>I have several neighbours who are elderly and living alone in family homes but don't want to leave Yarralumla. If they had an aged care option in our suburb it would contribute to family homes being made available in 2600.</p> <p>Bike / walking paths:</p> <p>Please Link bike/walking paths with brickworks and surrounds.</p>
3	Angela Geary	<p>How are Yarralumla residents expected to ever get parking at the shops with so many new people being added as residents and workers at the CSIRO site in Yarralumla with the new redevelopment plan? What if any consideration was given to how all these new people will impact traffic throughout Yarralumla and parking at the shops?</p>
4	Alan Titheridge	<p>This development is a welcome one for the area. It is a tasteful and attractive option for potential downsizers such as us.</p>
5	Department of Finance	<p>Thank you for your letter of 13 November 2023 advising the Department of Finance (Finance) that on 11 November 2023, the National Capital Authority had released National Capital Plan Draft Amendment 97 - Block 7 Section 4 Yarralumla (former Australian Forestry School) (DA97) for public consultation.</p> <p>We note that DA97 proposes to amend the land use of Block 7 Section 4 Yarralumla (the former Australian Forestry School) from Community Facility to a mixed-use zone. The zoning would allow residential, aged care, social housing, commercial accommodation, community facility and ancillary commercial uses. If approved, the proposed amendment would contribute to an increase in the housing supply, deliver urban consolidation and make efficient use of existing infrastructure.</p> <p>We further note that the DA97 protects existing heritage buildings and landscapes and incorporates detailed conditions of planning and design to ensure that future development of the site is of a quality befitting the significant location.</p> <p>Finance has reviewed the DA97 documentation, and has no objection or comment in regard to the proposed amendment.</p>
6	Mark Durham	<p>I offer for your consideration the following comments, questions and broad observations I believe are central to the proposed development at Forestry Place, and the future of Yarralumla.</p> <p>I have been a resident of Yarralumla for 24 years in close proximity to Forestry Place and I've seen the various flawed incarnations of the proposals to develop 'The Brickworks'. While not an opponent to measured, reasonable and effective development of</p>

	<p>Forestry Place, I have become increasingly concerned that the proposed development as presented by the proponent goes significantly beyond that balanced criteria, particularly now that I have read the proponent's proposal, visited their information sessions and discussed with their representatives the matters that concern, and superimposed those outcomes as I see them against other major local development proposals and government policy changes that will collectively impact our suburb.</p> <p>I am especially concerned to know that the NCA's evaluation of the proposal has not been done in isolation and consideration of those other significant development proposals in the suburb and in pending ACT government policy changes to the new 'district framework' and the '800sqm' dual occupancy policy development. Yarralumla's future lies in a harmonious and measured marriage of all of these. So I would like to put to the NCA the following which I find increasingly hard to rationalise within the hot pot and uncertainties of those other developments.</p> <ul style="list-style-type: none"> * The proponent's acknowledgment of the eventual 3000 motor vehicle traffic movements per day at Wilf Crane Crescent and Banks Street plus some 230 per hour peak hour movements - common sense at least would have one question how that monumental surge in traffic is going to impact both the immediate residential area/shopping centre and suburb at large and egress points from Yarralumla; * Using LDA formula, 300 residences x 2.5 residents and 1.5 motor vehicles equates to a permanent 'residential' population of 750 people and 450 motor vehicles within Forestry Place - all within 11 hectares and adjacent to the proposed similarly sized Brickworks; * An additional notional population of 130 aged care residents plus staff plus visitors plus medical transportation and deliveries (on an all-hours basis) directly onto Banks Street - a not unreasonable conclusion is a resulting 24 hours of vehicular movement; * An unknown but obviously substantial number of people at the proposed conversion of the heritage Forestry House into a hotel (including the conversion of the existing legacy of 42 rooms) plus same size 2 storey addition to its rear to contain at least one restaurant and cafe - where is the impact statement on local residents of hotel staff numbers, resident guests, hotel patrons, deliveries, late trading hours etc with the likely future use as a venue for concerts, conferences and the like with concomitant people and vehicle movements, (and the proponent's inability to say whether the new hotel will have underground parking for guests, staff and patrons); * Unspecified and unknown additional motor vehicle parking facilities to existing roadside spaces for all the above within the precincts of Forestry Place, excepting the proponent's claim that residences will have basement parking - parking provision as shown on the proponent's diagrams does not account for additional parking beyond the existing narrow street-scape within
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	<p>Forestry Place so significant spillage of parked cars to nearby streets is inevitable, yet they say parking will be consistent with ACT standards, but where(?);</p> <p>*No apparent reference to the impact on parking needs and traffic flow during the various seasonal sporting fixtures that will continue on the ACT government responsible oval opposite Forestry House where competition for car parks with future hotel patrons will be high - some 9 individual car parks only are presently available opposite forcing sporting attendees to park amongst the trees to the south of the oval or half on road and verge;</p> <p>*What additional impact to Forestry Place and the Brickworks will the proposed redevelopment of the ACT public housing estate at Minimbah Court at Schlich St, Banks St and Solander Place (opposite Forestry Training School) where a possible additional 30-50 residences will be built (ie some possible 100 additional residents in the immediate location of Forestry Place) - what are the collective implications (Ref for your consideration the 2016 CSIRO and Yarralumla management plan that shows a special place Minimbah Court has in the history of Forestry Place and the workers who built the now heritage buildings there?);</p> <p>*As mentioned, a very similar sized residential and commercial development at the Brickwork in Yarralumla only a very short distance from Forestry Place - 'same-same' population/vehicle/infrastructure questions exist;</p> <p>*No additional community infrastructure for the Brickworks, Forestry Place and Minimbah Court ie shops, dedicated car parks and suburban road access, with a real likelihood of the promotion of 'rat running' through the suburb - Alexandrina Drive being the perfect alternative access to Civic;</p> <p>*The worrying implications to population and traffic size in Yarralumla of both the ACT government's new building framework with very significant likelihood of 6 storey and 3 storey residential buildings from Adelaide Avenue to Loftus Street, plus the government's recent announcement of 800sqm dual occupancy provisions.</p> <p>Thank you for the opportunity to submit these growing concerns and questions for you consideration.</p> <hr/> <p>Further to my submission in respect of the subject heading and your response inviting any further questions, I have the following, including some emphasis to my earlier questions, to add to that submission if I may.</p> <p>I refer you to the heading 'Heritage and adaptive reuse' on page 18 and the two paragraphs therein of the printed Draft Amendment 97 document. My questions are:</p> <p>*Why does the NCA use 'should not result' rather than 'must not result' in respect of adaptive reuse of heritage buildings' in any 'SIGNIFICANT ADVERSE (my emphasis) affects on the AMENITY (my emphasis) of the surrounding area? What is the NCA's</p>
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		<p>definition of 'significant adverse' as opposed to ordinary adverse; what does 'amenity' mean in real, practical speak and what constitutes 'surrounding area' (ie the immediate precinct or adjacent streets outside Forestry House)?</p> <p>*How do these matters impact the conversion of Forestry House to a hotel including accommodation, restaurant and cafe and the construction of a large double storey extension to the rear of the hotel? What does the NCA assess to be the likely real-life overall affect on the amenity and surrounding area (located on a single narrow access road immediately opposite a well used public sporting oval with little residual amenity space) of the typical activity and purpose of a hotel, its patrons and unspecified trading hours?</p> <p>*In the view of the NCA has the amenity of local residents in adjacent streets been satisfactorily addressed in terms of the inevitable and significant access by greater numbers of motor vehicles and parking spillage from the very few car parks within the development, and especially in terms of the operation of the hotel, restaurant and cafe? Has impact on local residents been considered at all and with what results or is 'amenity' reserved for Forestry Place itself, or indeed is that considered outside the terms of reference and authority of the NCA but within the orbit of the ACT Government once the development's physical boundaries are compromised?</p> <p>*My comments in my earlier submission concerning the need for the NCA to assess the issues confronting Forestry Place and its impact on Yarralumla at large must not be done in isolation of the other significant development plans and revised government building framework policy etc that now confront us. With respect, to ignore this would be an abrogation and an insult to those who have gone before us in the design, establishment and protection of one of Canberra's oldest suburbs and the heritage treasures therein.</p>
7	Yasumi Tebecis	<p>I support the variation of use outlined in DA 97.</p> <p>It is because with the increasing number of the aged, more facilities are needed that are near where they have been living, near their friends and relatives, shops and medical specialists they have been using, and have a network of community. For this, mixed use of land is preferable, and in the area where the need exists.</p> <p>Thank you very much.</p>
8	Name Withheld	<p>The redevelopment of the former Australian Forestry School would be disastrous if it includes residential zoning.</p> <p>The current zoning is appropriate for community use. Most Yarralumla residents would probably agree that an aged care facility or hotel would be also appropriate and can be accommodated.</p>

		<p>Mixed zoning however would change the entire dynamic of the suburb most notably due to the increased traffic. It should be noted that the Brickworks will already increase the number of dwellings in Yarralumla by 380. The added traffic from the brickworks alone will cause chaos with egress in and out of the suburb.</p> <p>My two large objections for residential zoning of DA 97:</p> <ul style="list-style-type: none"> - huge increase in traffic changing the character of Yarralumla from a leafy green suburb to a major thoroughfare with large bottlenecks of traffic - huge destruction of the green spaces of the suburb
9	Yarralumla Residents Association	<p>EXECUTIVE SUMMARY</p> <ol style="list-style-type: none"> 1. The scale and impact of the traffic generation from the Forestry Place Development (former Australian Forestry School) on Yarralumla has been substantially underestimated. The poor network connectivity of the Site to Yarralumla and the traffic movement characteristics and patterns of the suburb have not been understood and applied in the Transport Impact Assessment (Traffic Assessment). The inability of the adjacent roads of Bentham Street at the Yarralumla Shops and Weston Street (W), to carry the increased traffic due to local constraints has not been recognised. 2. The Traffic Assessment has not provided a sound basis and is fundamentally flawed because the parameters and assumptions of the modelling do not align with the local characteristics, street hierarchy and traffic flows of Yarralumla. Also the Draft Amendment 97 provides for a 13% greater scale of Dwellings that is 300 compared to the Proponent's Forestry Place Masterplan of 266 Dwellings on which traffic impacts have been assessed. <p>These traffic impacts should be addressed through:</p> <ul style="list-style-type: none"> • a reduction in the scale of the Development by lowering the maximum number of dwellings to 230 this number to include any social housing and aged care independent living units for seniors, AND • setting conditions on the number of traffic movements to be generated through Commercial, Community Facility and Office use, OR • the provision of a new dedicated access road to the Australian Forestry School Site, as has been done with the adjoining Canberra Brickworks Precinct which is of similar scale.

		<p>3. The drafting in Draft Amendment 97 of permitted uses and controls, and Figures 115 and 116, lacks clarity, is ambiguous and contains errors which should be addressed to ensure the integrity of this legal document:</p> <ul style="list-style-type: none"> • The legal status and standing of the “Indicative Masterplan” at Figure 116 is unclear • Key control provisions are not defined for “Developable Area 41,500m²”, “Development Footprint”, “Open Space” and Aged Care Facility • Implementation of “Mixed Use” is not a formal requirement and the only provision of full development as Community Facility is the footprint cap of 41,500m² • Figure 116 “Indicative Site Masterplan” has many errors (including compass North pointing East) and Figure 115 “Development controls” is a diagram with no scale, no dimensions, no labelling of existing buildings, no streets, no co-ordinates or other indications as to location and boundary setbacks are not to scale. <p>4. The ACT Government Public Playing Field (Block 4 Section 4 Yarralumla) currently has access to the parking area via the private road Wilf Crane Crescent – future access to this public parking for the playing field is not provided for.</p> <p>5. There is no provision in Draft Amendment 97 for the long-term management, maintenance and funding for protection of the heritage values of the site as a whole after completion, in particular the heritage tree plantings. Also the Forestry School Building is at risk from the increased volume of traffic owing to the Wilf crane Crescent being only 4m wide at this point.</p> <p>KEY ISSUES AND EXPLANATION</p> <p>1. The Draft Amendment 97 provides detailed conditions for permitted use of and planning, design and development for the former Australian Forestry School Site, called “Forestry Place” by the Proponent. This provides for a large scale mixed-use development of 300 Dwellings, Commercial and Office (including possible Hotel), Community Facility (including possible Aged Care Facility).</p> <p>2. The drafting in Draft Amendment 97 of “Designated Areas and Special Requirements” Section (Pages 16-22) and of Figures 115 and 116, lacks clarity, is ambiguous and contains errors which should be addressed to ensure the integrity of this legal document</p>
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		<ul style="list-style-type: none"> • The Draft Amendment 97 as currently drafted does not require “Mixed Use” or implementation of the “Indicative Site Masterplan” and without more detailed provisions or conditions for “Community Facility,” which is only subject to the development footprint cap of 41,500m², the development could bear little relationship to the “Indicative Site Masterplan”. • There are errors in the Figure 116 “Indicative Site Masterplan”. • The legal status and standing of the “Indicative Site Masterplan” at Figure 116 is unclear. • Figure 115 “Development controls for Block 7 Section 4 Yarralumla” is problematic in setting out the development controls as it is a diagram with no scale, no dimensions, no labelling of existing buildings, no streets, no co-ordinates or other indications as to location and boundary setbacks are not to scale. • Key control provisions are not defined including: “Development Footprint”, “Developable Area 41,500m²”, and “Open Space”. <p>3. The Draft Amendment 97 provides for a development of greater scale than the Proponent’s Masterplan. The Draft Amendment 97 provides for 300 Dwellings (+13%) while the Proponents proposal is for 266 Dwellings. While the Proponent’s proposal provides for a possible 130 Bed High-End Aged Care Facility, Aged Care is not defined in the Draft Amendment. The definition of Community Facility is broad and includes Aged Care, as well as Education, Research, Health and other institutions. An Aged Care development could therefore, for example, be any number of Independent Living Units for Seniors, in addition to the 300 Dwellings cap in the Draft Amendment and this would have increased site density and traffic implications.</p> <p>A definition of “Aged Care” is essential in the Draft Amendment 97 and Independent Living Units for Seniors should be included in the current 300 dwelling maximum, as is already the case for social housing.</p> <p>4. The Australian Forestry School Site (10.9 ha) is adjacent to the Canberra Brickworks Precinct Development (16 ha) and the scale of these two developments is equivalent (in terms of dwelling numbers, Commercial and Office space and re-purposing heritage buildings). To address the traffic impacts of the Canberra Brickworks Precinct development on Yarralumla, all residential and commercial traffic is connected to the main road network by a new purpose built dedicated Access Road (Brickworks Road) that connects to a non-residential street. This was done specifically to preclude high volumes of traffic accessing the precinct via the existing narrow residential streets of Yarralumla.</p> <p>The Australian Forestry School Site on the western periphery of Yarralumla is land-locked by the Royal Canberra Golf Course, the Canberra Brickworks Precinct and Westridge House. Because of this the Site has poor connectivity through the</p>
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suburb and to the arterial road network which will be required to carry all the traffic generated by the development. The configuration of the roads adjoining the Site mean that they do not have the ability to carry the traffic that will be generated by the development.

5. The Traffic Assessment does not provide a sound basis from which to assess the scale and impact of the traffic that will be generated from the Forestry Place Development. The application of the, intersection counts and traffic assessment modelling to Yarralumla is fundamentally flawed in the Transport Impact Assessment of the Forestry Place Development. The parameters and assumptions of the modelling do not align with the local characteristics, street hierarchy and traffic flows of Yarralumla. For example, Yarralumla has high out-of-suburb traffic levels for childcare centres, the primary school (80% non-resident), churches and the Royal Canberra Golf Club. Weekend traffic in Yarralumla is 17%-56% higher than weekday traffic (Banks Street 2015-16), especially in summer, as Yarralumla is the access point for users of Weston Park and Lake Burley Griffin and their attractions. For example the 2nd December 2023 Rowing Regatta had 753 competitors, plus support crews, family and spectators, many from interstate. This results in a high level of Yarralumla traffic being visitors not residents.

The analysis has resulted in a substantial underestimate of increased traffic volume generated by the Forestry Place Development of around 36% to 50%, and of the impacts of the increased traffic on Yarralumla, its infrastructure and the interconnectivity of the road network.

6. Local traffic issues in relation to the existing traffic and parking conditions surrounding the site have not been identified and considered, nor has the impact of the development proposal on the surrounding road network. The Traffic Assessment has 60% of the Forestry Place Development traffic (2,300 VPD to 3,300+VPD) travelling via Banks Street then Bentham Street, and a further 30% via Banks Street then Weston Street (W). This traffic flow is not viable as Bentham Street at the Yarralumla Shops is already unusable as a throughfare and cannot cope with an additional 1,400 VPD
 - This section of Bentham Street at the Yarralumla Shops does not meet the AS 2890.5. It is very narrow and has on-street 90o angle parking on both sides with 46 bays. This on street parking is constantly over capacity.
 - This area is dangerous as vehicles parking or reversing to leave must cross onto both sides of the street and this precludes use by any through traffic. It results in roadblocks, traffic jams and multiple daily minor accidents, including by former Prime Minister Scott Morrison in 2021 (see Appendix).

		<ul style="list-style-type: none"> • In addition the Traffic Assessment suggests that for improved public transport the Bus Route 57 be re-routed to travel via the Forestry Place Development and through Bentham Street at the Yarralumla Shops. This is not a safe or viable option. This would further increase congestion and accidents. <p>Bentham Street is not a viable option for Forestry Place Development traffic. Thus 90% of the traffic flow generated, that is an additional 2,000 VPD plus, would be forced along Weston Street (W) resulting in the failure of the Novar Street-Weston Street intersection which already has a high accident rate.</p> <p>The impact of a development of this scale on the surrounding street hierarchy and its integration with the existing network has been substantially underestimated and major local issues are not recognised and hence not addressed.</p> <ol style="list-style-type: none"> 7. Yarralumla is essentially inaccessible from three sides and there is a high level of Yarralumla traffic being visitor and not residents to Lake Burley Griffin and associated attractions, especially on weekends. The Australian Forestry School Development (Forestry Place) and the adjacent Canberra Brickworks Precinct Development are on the far western side of Yarralumla, are both essentially “land locked” by Dunrossil Drive/Government House, Royal Canberra Golf Course, Westridge House and Lake Burley Griffin. For the Canberra Brickworks Precinct the nature and scale of the traffic issues were recognised and addressed through the provision of a new dedicated access road via a non-residential street and connected to a main arterial road. 8. The need for new access to the western side of Yarralumla to take externally generated traffic down to the lake and relieve congestion in the suburb was recognised in 1979 (Parliamentary Report of the Joint Committee on the Australian Capital Territory Report 10 May 1979). This was followed by the 1980 Policy Plan for Yarralumla which gazetted the “West Yarralumla Tourist Road” that ran from the Dudley Street Cotter Road intersection along the back of the Canberra Brickworks Precinct and the Australian Forestry School Site and then down to Weston Park. This proposed road is no longer gazetted. 9. The traffic impacts of the proposed Australian Forestry School Site Development should be addressed through: <ul style="list-style-type: none"> • a reduction in the scale of the Development by lowering the maximum number of dwellings to 230 including any social housing and aged care independent living units for seniors, AND • setting conditions on the number of traffic movements to be generated through Commercial, Community Facility and Office use, OR
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- the provision of a new dedicated access road to the Australian Forestry School Site, as with the adjoining Canberra Brickworks Precinct which is of similar scale.
10. The “Indicative Site Masterplan” provides for a setback of 50m along Banks Street, however only a 20m set back along Bentham Street. As the new 3 storeys plus attic Dwellings will be in such close proximity to existing dwellings on Bentham Street the set-back along Bentham Street should also be 50m, which aligns with the setback for most of the existing buildings on the Bentham Street side.
 11. The ACT Government Public Playing Field “Forestry Oval” (Block 4 Section 4 Yarralumla) parking area is currently accessed via the private road Wilf Crane Crescent. There are no provisions for future public access to this parking area along a private road.
 12. There is no provision in Draft Amendment 97 for the long term management, maintenance and funding for protection of the heritage values of the site as a whole after completion. The Site will have 60% for open space and there is a requirement “for retaining existing trees and renewal of landscaping across the site”. There are likely to be separate leases for individual and groups of dwellings, and for commercial buildings, leaving the remaining landscape without an owner, manager, or budget funding.
 13. The former Australian Forestry School Heritage Building is at high risk of traffic damage and provisions for its protection are required in the Draft Amendment 97. The Wilf Crane Crescent is only 4m wide where it directly abuts the Australian Forestry School and the increased traffic poses a high risk to the structure from vibration and impact. The boundary with the ACT Government’s Public Playing Field (Block 4 Section 4 Yarralumla) precludes road widening unless a section of land from Block 4 Section 4 is acquired from the ACT Government.

DETAILED ANALYSIS OF ISSUES AND IMPACTS

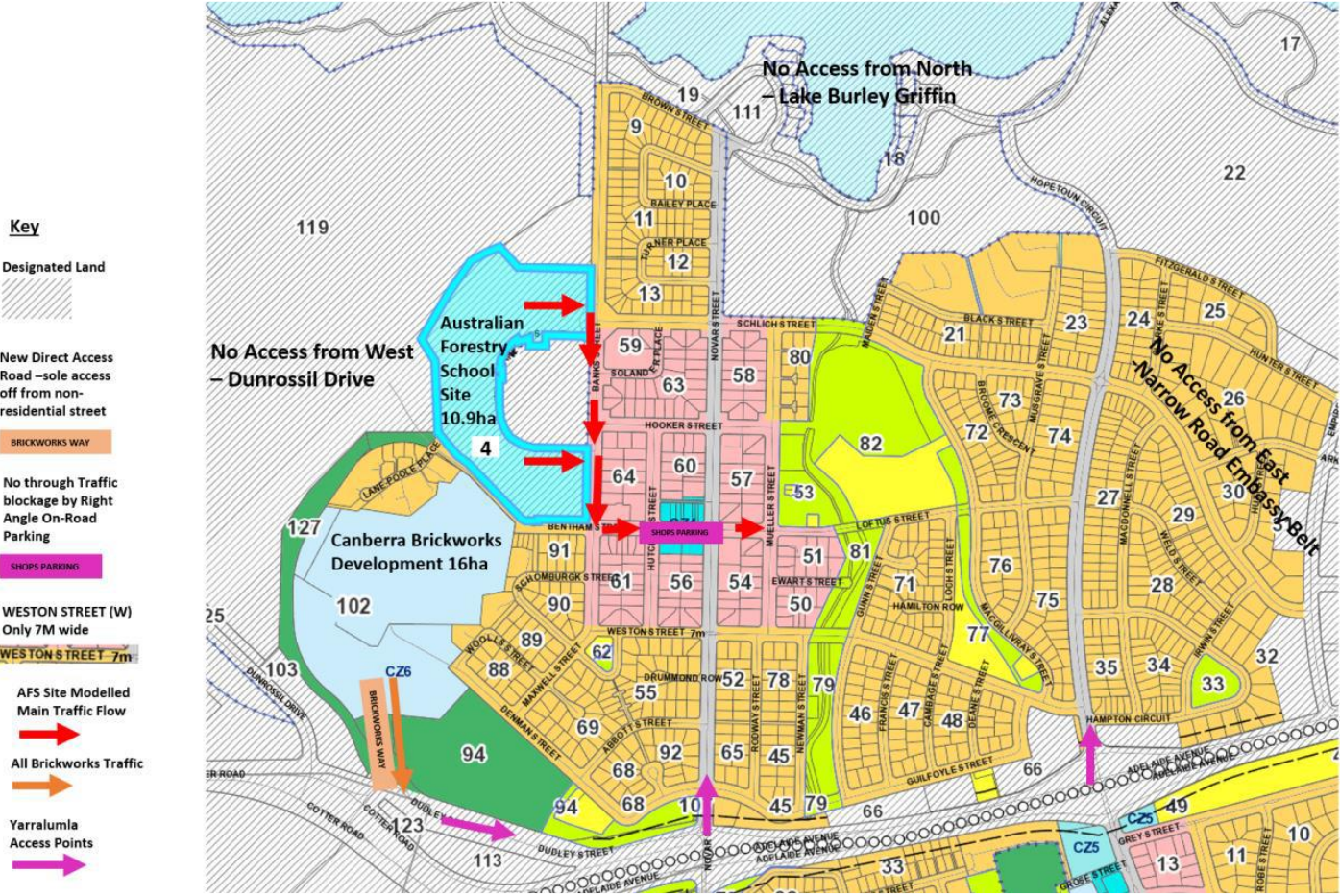
1. Context

The National Capital Plan Draft Amendment 97 (Draft Amendment 97) provides for a change of use for Block 7 Section 4 Yarralumla (former Australian Forestry School) from Community Facility to a mixed-use policy permitting residential commercial accommodation, community facility, and ancillary commercial uses. The former Australian Forestry School is referred to as Forestry Place in the proponents documentation.

For the last 20 years the Australian Forestry School Site has been used by CSIRO, and others for predominantly scientific purposes. The Australian Forestry School Site (10.9 ha) is bounded, to the south by Bentham Street and the Canberra Brickworks Precinct (16

ha), and to the west and north by the Royal Canberra Golf Club. The Australian Forestry School Site was entered on the Commonwealth Heritage List in June 2004 and the Commonwealth Heritage listing remains whilst the land is “Designated Land” under the purview of the National Capital Authority.

Yarralumla traffic flows and location of Australian Forestry School Site and Canberra Brickworks Precinct



The development of the Australian Forestry School Site together with the adjacent development of the Canberra Brickworks Precinct will add approximately 50 per cent to the population of Yarralumla and impact the suburb with significant additional demand on facilities and infrastructure.

The Draft Amendment 97 provides detailed conditions for permitted use and planning, design and development for the site (see table below). The proposed Draft Amendment 97 provides for a large scale mixed use development (300 Dwellings, Commercial and Office (Including possible Hotel,

Community Facility (including possible Aged Care Facility). The definition of Community Facility is broad and includes education and research establishments, cultural facilities, health centres and hospitals, institutions, and places of worship. Thus, under the proposed Draft Amendment 97 the Site can be developed solely as Community Facility capped at 41,500m², mixed used is not mandated.

National Capital Plan Draft Amendment 97 Block 7 Section 4 Yarralumla

Proposed Permitted Land Uses

- 1. Residential – limited to a maximum of 300 dwellings*
- 2. Social Housing – any dwellings to be contained within residential dwelling limits*
- 3. Commercial Accommodation – limited to the adaptive reuse of Forestry House and addition to the west of Forestry House, to a maximum GFA of 3500m² combined.*
- 4. Community Facility*
- 5. Office – limited to the adaptive reuse of heritage buildings and a maximum GFA of 2600m²*
- 6. Road*
- 7. Indicative Master Plan provides for a Possible Aged Care Facility and a Possible Hotel*
- 8. Ancillary land use - Café, Bar, and/or Restaurant – limited to a maximum GFA of 600m²*

Other Conditions

- 9. *Maximum permitted building height is to be no more than 3 storeys plus attic and basement providing level is not more than 1.2 metres above datum ground level.*
- 10. *Maximum developable area of the site, as shown on Figure 115 of the Draft Amendment 97, is 41,500m².*
- 11. *Heritage buildings are to be retained*
- 12. *No additional vehicular access points to the site are permitted from Bentham Street*
- 13. *New buildings limited to those areas identified in Figure 115, and in accordance as per the distribution of buildings shown in Figure 116 of the Draft Amendment 97*
- 14. *Minimum of 60% of the site must be set aside for open space.*
- 15. *Minimum of 45% of the site is to accommodate deep soil zones for retaining existing trees and renewal of landscaping across the site.*

2. Draft National Capital Plan Amendment 97 - Designated Areas and Special Requirements

There are a number of areas of the Draft Amendment 97 in the section “Designated Areas and Special Requirements” (Pages 16-22) where the drafting and Figures lack clarity are ambiguous and contain errors which need to be addressed to ensure the integrity of this legal document.

Figure 116 Page 23 Indicative Site Masterplan

The Draft Amendment 97 is based on the Proponents Forestry Place Development Masterplan. This Masterplan is included in the Draft Amendment as “Indicative Site Masterplan” at Figure 116.

The amendment as currently drafted does not require mixed use or implementation of the “Indicative Site Masterplan”. Indeed the Site could be developed to the maximum allowed of 41,500m² entirely as Community Facility. There are no detailed provisions or conditions for Community Facility in the Draft Amendment 97 and such development would bear little relationship to the “Indicative Site Masterplan”. Community Facility provisions should be included in the Draft Amendment 97.

The "Indicative Site Masterplan" provides for a setback of 50m along Banks Street, however only a 20m set back along Bentham Street. As the new 3 storeys plus attic Dwellings will be in such close proximity to existing dwellings on Bentham Street the setback along Bentham Street should also be 50m, which aligns with the setback for most of the existing buildings on the Bentham Street side.

There are errors in the "Indicative Site Masterplan" Figure 116 and these should be addressed:

The North compass in Figure 116 is mis-labelled as it points East and there is no usable scale or dimensions.

The "Old Canberra Brickworks Redevelopment" is shown on the plan as extending to the corner of Bentham and Banks Street. This is incorrect the Canberra Brickworks development ends halfway between Lane Pool Place and the Bentham Street junction with Banks Street.

The Key in Figure 116 has errors and is unclear

- A path on the plan is labelled "9. Minor information pathways" – no information on what these are
- Page 18 states "Trees to be retained, and new plantings, should be generally as per Figure 116". This is a loose provision especially as the Figure 116 itself is indicative and hence not measurable or enforceable.

The legal status and standing of the "Indicative Site Masterplan" at Figure 116 is unclear and must be addressed.

Figure 115 Page 22 Development controls for Block 7 Section 4 Yarralumla

The Draft Amendment 97 provides Development controls for Block 7 Section 4 Yarralumla at Figure 115 and cross references this to Figure 116.

Figure 115 is problematic in setting out the development controls as it is a diagram with no scale, no dimensions, no labelling of existing buildings, no street names, no co-ordinates or other indications as to location, and boundary setbacks are not to scale.

Hence Figure 115 is in effect a sketch. Areas and elements are not defined, and as such it does not provide the development controls and would have no legal standing.

Page 17 refers to the "Development footprint". It states "To preserve the landscape qualities and character of the site, new buildings are limited to those areas identified in Figure 115, and in accordance as per the distribution of buildings shown in Figure

116.” and “The maximum developable area of the site, as shown on Figure 115, is 41,500m². However, Figure 115 does not define the areas for new buildings nor the developable area.

The Developable area 41,500 m2 is not defined in the Draft Amendment 97, as to what is included and excluded, nor does National Capital Plan include a definition. Clarity is required as to whether roads, courtyards, BBQ areas and paths, private gardens are included in the “Developable Area”.

Page 18 states “Within open space areas identified in Figure 115, minor structures and other elements such as paths, driveways, signage are permitted” however the open space is not defined because of the matters identified above.

“Figure 115 Development controls for Block 7 Section 4 Yarralumla” (Page 22)

Figure 115: Development controls for Block 7 Section 4 Yarralumla



Page 18 also states “A minimum of 60% of the site must be set aside for open space.”. Open Space is not defined – is this public open space and private open space, does this it “include the upper floor open space” (Page 19 of Draft) and private open space for ground floor apartments.

Figure 115 should clearly define the Site and development controls and footprint to scale with dimensions, co-ordinates, streets and labelling of existing buildings, open space, developable area and other indications as to location in a manner suitable for a legal instrument.

The Developable area 41,500 m2 should be defined in the Draft Amendment 97.

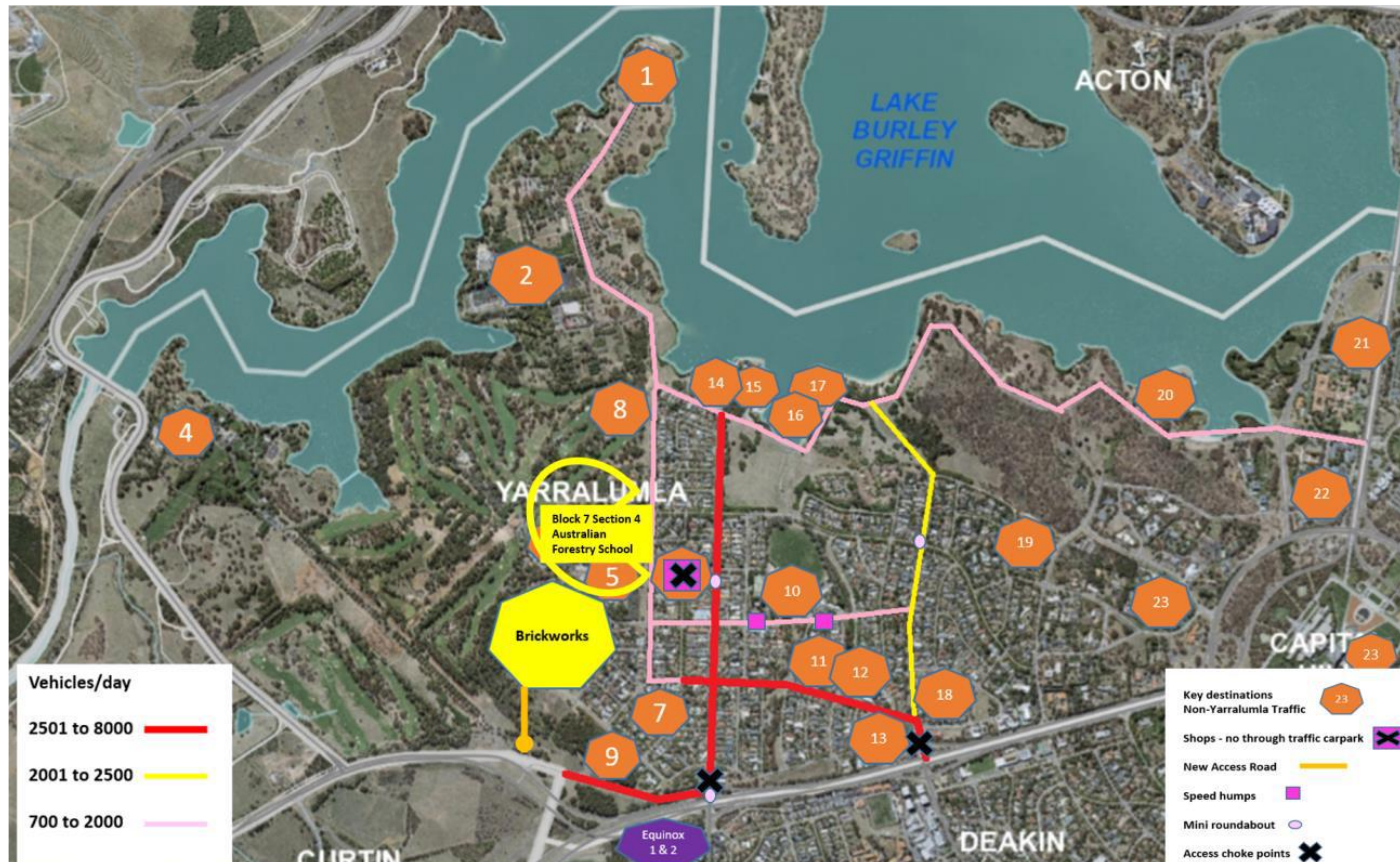
Open Space should be defined in the Draft Amendment 97.

Draft Amendment 97 vs Forestry Place Masterplan

The Draft Amendment provides for a development of greater scale than the Proponent’s Masterplan. The Draft Amendment 97 provides for 300 Dwellings and the Proponent’s proposal 266 Dwellings. The Proponent’s proposal is for a possible 130 Bed High-End Aged Care Facility. Aged Care is not defined in the Draft Amendment it comes under the broad definition of Community Facility. Hence an Aged Care development could be for example any number of Independent Living Units for Seniors, which would be dwellings for up to 2 people and in addition to the 300 Dwellings cap and have increased traffic implications. Note also that the Proponent’s Traffic Assessment is based on a possible proposed development not the “Land Use” as defined in Draft Amendment 97.

3. Australian Forestry School Site Development and Suburb and Network Connectivity

Yarralumla connectivity, primary access routes & destinations



Yarralumla is essentially inaccessible from three sides. In the north there is Lake Burley Griffin, to the West is bounded by Dunrossil Drive the approach route to Government House and to the east is the Embassy belt of narrow winding streets that do not carry through traffic. In addition Yarralumla is the access point for users of Lake Burley Griffin and its surrounding areas and attractions. This results in a high level of Yarralumla traffic being visitor not residents.

The Australian Forestry School Site (10.9 ha) is adjacent to the Canberra Brickworks Precinct Development (16 ha) and the scale of these two developments is equivalent. For the Canberra Brickworks Precinct site all residential and commercial traffic is connected to the main road network by a new purpose built dedicated Access Road (Brickworks Road) that connects to a non-residential street. This was done specifically to preclude high volumes of traffic accessing the Precinct via the existing narrow residential streets of Yarralumla. In contrast the Australian Forestry School Development sits on the western periphery of the suburb and is land locked by the Royal Canberra Golf Course and the Brickworks Precinct and has poor connectivity through the suburb and to the arterial road network.

Australian Forestry School Site Issues and Canberra Brickworks Development

Canberra Brickworks Development	Australian Forestry School Site
	Draft Amendment Provisions
16ha	10.9 ha
380 Dwellings Maximum	300 Dwellings Maximum (includes social housing numbers)
3 Storey plus Attic	3 Storey plus Attic
No Community Facility	Community Facility – no conditions
Commercial & Retail Total 6,886m ²	Commercial GFA of 3500m ²
No Aged Care	Possible Aged Care Facility – currently no definition and no conditions
	Current lease holder has proposed 130 Bed Aged Care Facility
No Hotel	Possible Hotel (current Lease) holder has proposed 80 Room Hotel
Repurpose Heritage Listed Buildings	Repurpose Heritage Buildings
	Office – limited to GFA of 2600m ²

	<p>New direct Access Road to take all Traffic (Brickworks Road) No new access road</p> <p>No direct road connectivity to residential areas of Yarralumla Main Access as Modelled through narrow on street right angle parking at Yarralumla Shopping and Business Centre in Bentham Street</p> <p>Heritage protected through lease arrangements Only heritage issues related to the development are referenced</p> <p>Traffic Impacts</p> <p>The Proponent’s Transport Impact Assessment (Traffic Assessment) of the Forestry Place Development was undertaken by Stantec. The application of the traffic modelling, intersection counts and traffic assessment to Yarralumla is fundamentally flawed as the parameters and assumptions of the modelling on which they are based do not align with the local characteristics, street hierarchy and traffic flows of Yarralumla.</p> <p>This analysis has resulted in a serious underestimate of the increase in traffic volume generated by the proposed Forestry Place Development and the impacts of the on Yarralumla, its infrastructure and the interconnectivity of the road network. Local traffic and transport issues have not been identified and considered in particular as they relate to the existing traffic and parking conditions surrounding the site and the transport impact of the development proposal on the surrounding road network.</p> <p>Baselines, Traffic Generation and Routing Issues (also see Appendix)</p> <p>The Traffic Assessment analysis applies current traffic levels based on traffic and intersection counts taken in 2020 and 2023 and they are acknowledged to be depressed numbers. They do not include operation at the site by CSIRO, and are also low due to COVID 19 impacts and the lag in adjusting back from work from home patterns. The increase in Banks Street Traffic from the Forestry Place Development from the levels when the CSIRO Facility was operating at the site prior to 2019 was not assessed. This can however be estimated from 2016 Banks Street traffic counts as generating 686 VPD with other Banks Street Traffic at 88 VPD.</p> <p>The Stantec estimates of traffic generated by the Forestry Place proposal is 2,324 VPD. If an estimate is made of that permitted for mixed-use under the broader Draft Amendment 97 the traffic generated would be 3,288 VPD an increase of 41%. A further baseline provided by Stantec is for a hypothetical CSIRO Facility (Community Facility) of 17,400m2 as allowed under the current lease extended from 9,800m2, which would generate 1,218 VPD.</p>
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The Stantec Traffic Assessment of the Masterplan has estimated the increase in traffic from existing levels and routing of traffic across the suburb to access and exit the broader network predominantly Adelaide Avenue and Cotter Road. This modelling shows an increase in Banks Street traffic of 1,800 VPD to 2,300 VPD. Bentham Street (as Shops) increases by 1,400 VPD to 3,700 VPD and Weston Street has an increase of 600 VPD to 2,100 VPD. This means that 60% of the Forestry Place Development traffic travels via Banks Street and Bentham Street across Yarralumla and a further 30% travels via Banks Street and Weston Street.

Such an increased level of traffic travelling through Bentham Street at the Yarralumla Business Centre and Shops is not viable as the area is already unusable as a throughfare. This section of Bentham Street is narrow at only 7m, has on-street 90o angle parking on both sides with 46 bays, and it does not meet the AS 2890.5. This on-road parking is constantly over capacity and is dangerous as vehicles parking or leaving must cross both sides of the street creating roadblocks, traffic jams and multiple daily minor accidents. There are over 40 serious crashes of parking/reversing vehicles reported to police in a 5 year period. There are also daily accidents (bumps), causing less serious damage that are not reported, including by former Prime Minister Scott Morrison in 2021. In 2014 Transport Canberra and City Services advised that some improvement could be possible with the removal of 10 of the parking bays and all the street trees – although this would still not meet the Australian Standard which requires carriageway width of 13m. All this precludes the use of this section of Bentham Street by through traffic.

The Forestry Place traffic will not be able to travel through the Bentham Street Shops area. This means that 90% of the traffic flow generated by the development, that is an additional 2,000 VPD plus, would be forced along Weston Street (W), and would result in the failure of the Novar Street-Weston Street intersection which already has a high accident rate.

Bentham Street (looking east) - Yarralumla Centre & Shops and Novar Street mini roundabout



Bentham Street Yarralumla Shops (looking west)



Media Articles on Accidents at Yarralumla Shops

CBR City News – 17 December 2014 -Canberra Confidential / Panel beaters rejoice

The panel beaters of Canberra must be rejoicing at TAMS' tardiness to fix the parking idiocy at the Yarralumla shops where cars park nose in both sides of Bentham Street, meaning simultaneous reversing can end in accidents, as happened here.



Local Liberal MLA Steve Doszpot, who has been nagging for a safe solution, bemoaned the latest episode that had a black car lurching forward to avoid backing into someone and in the process pushed the parked grey car on to the welcome mat of a gift store. As Steve points out, it's a mercy no one was walking by at the time.

Betoota Advocate 18 August 2021- Errol Parker "We Wish It Were Different," Says Scotty After Backing His Beamer Into Another Car At The Yarralumla Shops

Scott Morrison has told another Canberra motorist that he wished things could be different after he reversed the prime ministerial BMW 7-series into another car at the Yarralumla shops this morning.

"Sorry, mate," said the PM. "We wish things could be different, hey? Shit. Oh well, it looks like there's more damage to my car than yours." The other motorist, Gavin Pooley, who's a Royal Canberra Golf Club greenskeeper, assured the Prime Minister that mistakes happen and it's OK as long as you own up to them. The Prime Minister's eyes widened. "Well, mate," he said. "Perhaps if you'd parked a bit better in the lines, I wouldn't have hit you. I mean, it's not all my fault," "I don't care who takes the blame for it, honestly, I don't. But it doesn't look like the damage is very bad so how about we just trade details and keep the insurance companies out of it? I don't need to tell you that I'm not insured to drive this thing. It's like driving a bloody boat, it is. Not that I know what that's like, I don't think I've ever driven a boat before," "Anyway, give your details to my security blokes and that'll be that. Again, we wish things could be different," "Cheers, mate. I trust this issue has been resolved."

Damage to Scott Morrisons BMW 7-at Yarralumla Shops 2021



Public Transport: Routing Bus 57 via Yarralumla Shops Bentham Street

In addition the Traffic Assessment suggests for improved public transport the realignment of the Bus Route 57 to also travel via the Forestry Place Development on Banks Street and through Bentham Street at the Yarralumla Shops.

Realignment Bus 57 Route



Bus 57 going through Yarralumla Shops would look something like this



4. Yarralumla and Site Connectivity and Scale of Development

Yarralumla is essentially inaccessible from three sides and there is a high level of Yarralumla traffic being visitor and not residents to Lake Burley Griffin and associated attractions, especially on weekends. The Australian Forestry School Development (Forestry Place) and the adjacent Canberra Brickworks Precinct Development are both on the far western side of Yarralumla.

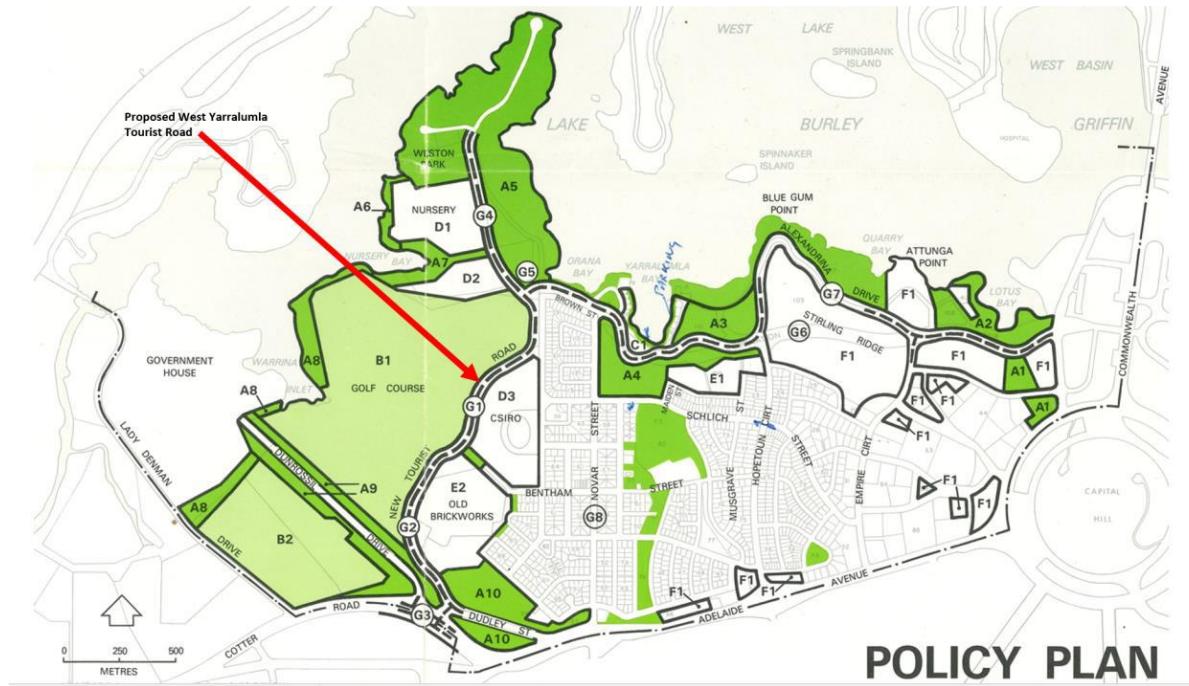
The traffic issues identified above show that the impact of a development of this scale on the surrounding street hierarchy and its integration with the existing network has not been adequately considered. Nor has the ability of the surrounding centre hierarchy to accommodate the development been analysed, nor the needs of the adjacent businesses, centres and destinations.

Traffic numbers are underestimated and the existing road hierarchy with routing of the traffic from the new development via the Yarralumla Shops or through the 7m wide section of Weston Street is not viable.

For the adjacent Canberra Brickworks Precinct which is a development of equivalent scale these issues were recognised and addressed through the provision of a new dedicated access road via a non-residential street and connected to a main arterial road.

The need for new access to the western side of Yarralumla was recognised in the Parliamentary Report of the Joint Committee on the Australian Capital Territory (Report on Proposals for Variations of the Plan of Lay-out of the City Of Canberra and Its Environs (Sixty-Seventh Series) 10 May 1979 and in the 1980 Policy Plan for Yarralumla (see diagram below and Appendix) which gazetted the "West Yarralumla Tourist Road" that ran to Weston Park at the back of the Brickworks and the Australian Forestry School Site. This proposed road is no longer gazetted.

1979 Policy Plan for Yarralumla Map showing West Yarralumla Tourist Road (National Capital Development Commission) – road no longer gazetted



These traffic impacts of the proposed Australian Forestry School Site Development should be addressed through:

- a reduction in the scale of the Development by lowering the maximum number of dwellings to 230 including any social housing and aged care independent living units for seniors, AND
- setting conditions on the number of traffic movements to be generated through Commercial, Community Facility and Office use, OR
- the provision of a new dedicated access road to the Australian Forestry School Site, as with the adjoining Canberra Brickworks Precinct which is of similar scale

5. Heritage

The Draft Amendment 97 does not currently include a provision that ensures the long term management of heritage values of the entire site and buildings.

It is not clear upon completion of construction of the site how the minimum of 60% of the site set aside for open space and the minimum of 45% of the site to have deep soil zones for retaining existing trees and renewal of landscaping across the site” will be managed and maintained. There are likely to be separate leases for individual dwellings and commercial buildings, leaving the remaining landscape without an owner or budget funding. This could be addressed through community body corporate lease provisions. It is essential that such a mechanism is found to protect the overall long term heritage values of this important site.

The Forestry School Heritage Building is at high risk of traffic damage to its walls and foundations post the development of the Site. Provisions for its protection are required in the Draft Amendment 97. The north segment of Wilf Crane Crescent is only 4m wide where it directly abuts the Forestry School Heritage Building and down to Banks Street. This section is one-way traffic and cannot be widened, the constraint being that the south edge of the road is at the boundary with the ACT Government’s Public Playing Field (Block 4 Section 4 Yarralumla).

Australian Forestry School abuts 4m wide Wilf Crane Crescent

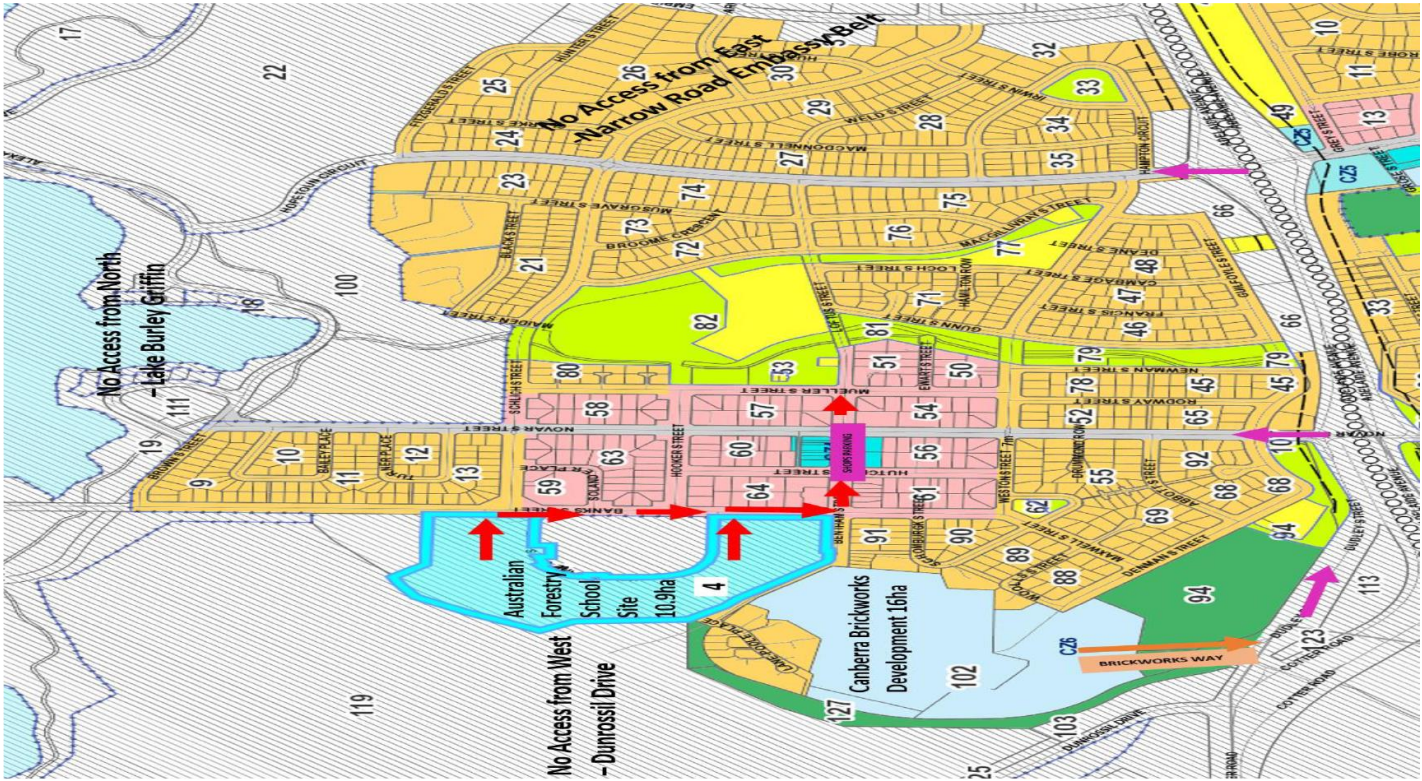


Australian Forestry School Wilf Crane Crescent one-way traffic



APPENDIX – SUPPLEMENTARY INFORMATION AND ANALYSIS

SECTION 1 Australian Forestry School Site Block 7 Section 4 Yarralumla – Large Version



- Key**
- Designated Land
 - New Direct Access Road - sole access off from non-residential street
 - BRICKWORKS WAY
 - No through Traffic blockage by Right Angle On-Road Parking
 - SHOPPING
 - WESTON STREET (W) Only 7M wide
 - WESTON STREET (W)
 - AFS Site Modelled Main Traffic Flow
 - All Brickworks Traffic
 - Yarralumla Access Points

SECTION 2 - 1979 Policy Plan for Yarralumla Map showing West Yarralumla Tourist Road (National Capital Development Commission) – (no longer gazetted)

YARRALUMLA
POLICY PLAN

National
Capital
Development
Commission

Yarralumla is one of Canberra's oldest areas. It contains buildings of national importance, residential areas, and is popular for leisure recreation.

The Commission policy for Yarralumla has been to maintain its residential character while at the same time catering for other activities. Recent pressure for the growth of these activities has led to the need for a more detailed policy plan for the area.

Consequently in March 1979 the Commission released the Draft Yarralumla Policy Plan for public comment.

Following a public review of the draft plan and consideration of the comments made by the public, the Commission accepted the policies set out in this document as the basis for future development.

General Policies apply to Yarralumla as a whole. Specific Policies apply to particular locations or to significant features.

POLICY PLAN

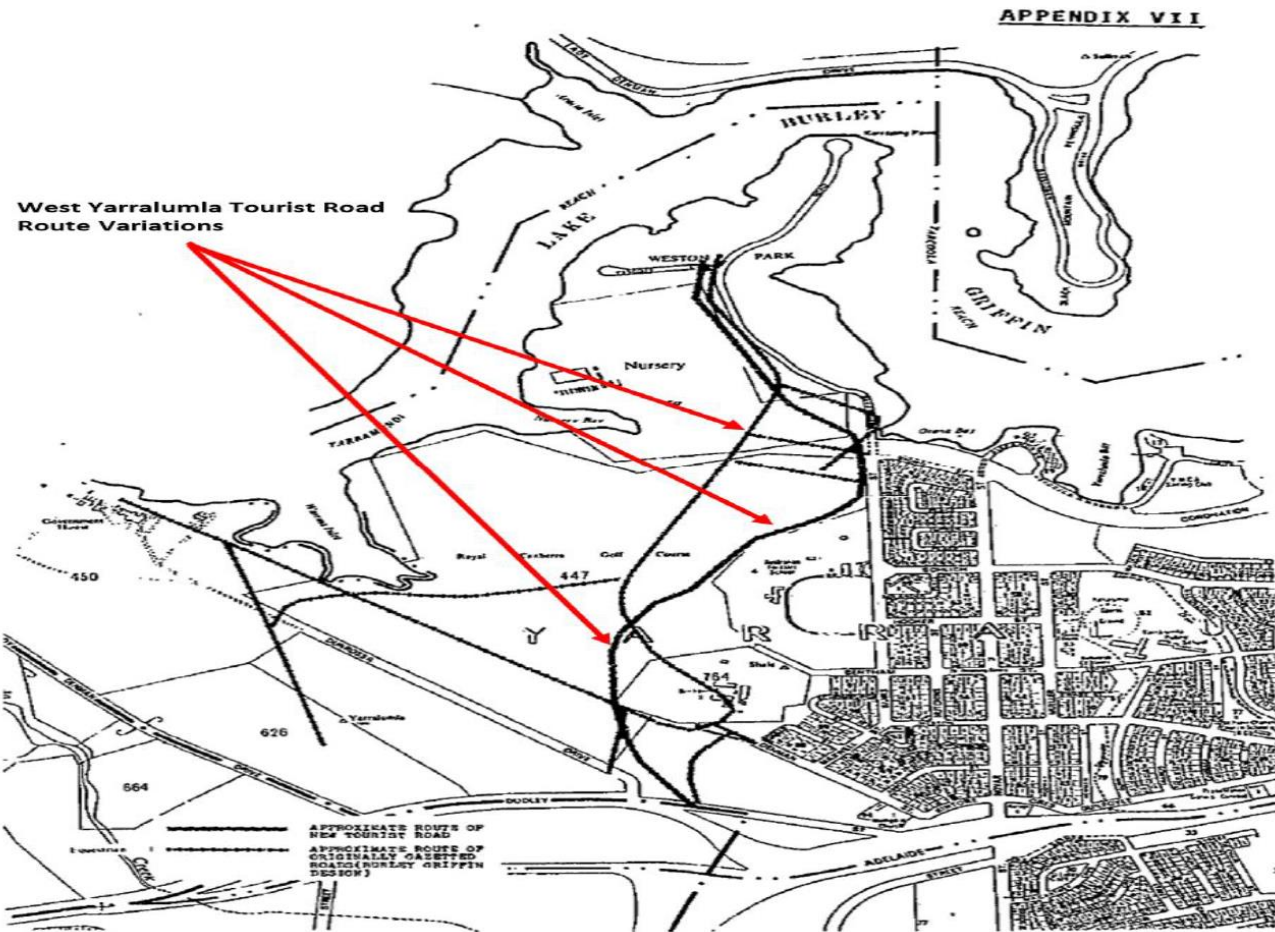
General Policies	Specific Policies	Communications and Movement
<p>1. Land Use</p> <p>The policy is to provide for additional demands for recreation, touring, National Capital and tourist uses in a manner compatible with the ecological and amenity of the Yarralumla area.</p>	<p>A. Open Space/Recreation</p> <p>A1 Open space in tourist state accommodating a possible pedestrian route to Capital Hill.</p> <p>A2 Lotus Bay/ Alexandria Drive to be relocated to allow for increased recreation use, particularly for public school sporting, touring and boat trailer parking.</p> <p>A3 The 'recreation' Yarralumla Beach is to be developed as open space suitable for beach activity, with the opportunity for informal sports. In the long term the area may be developed more intensively as a park with major recreation facilities. Alexandria Drive is to be relocated to allow more effective recreation use of the beach and its immediate hinterland.</p> <p>A4 This area is to be retained for recreation use.</p> <p>A5 Western Park current intensive recreation uses are to be extended through additional areas being made available progressively by the continuation of the quarry site. Consideration will be given in the long term to relocating the quarry access roads so as to allow more effective use of recreational purposes and to create a more attractive approach along the existing avenue of elm along the central ridge.</p> <p>A6 This lot reserved to the Nursery is to accommodate a pedestrian trail linking Western Park to Nursery Bay.</p> <p>A7 Nursery Bay is to be developed as a secluded informal picnic area with only limited car access.</p> <p>A8 The Golf Course and Government House premises is to accommodate pedestrian, cycle and equestrian trails.</p> <p>A9 Current developments setting is to be retained.</p> <p>A10 The area along Duffy Street and Cotter Road is to be retained as a buffer between inner Canberra and Hooton.</p>	<p>G. Vehicular Access</p> <p>G1 A new tourist/recreation road is to be provided to the west of the Blockworks and CSIRO site to facilitate recreation access to the Blockworks, Royal Canberra Golf Club, Western Park and the lawns, and to avoid the need for this access to be via internal residential streets.</p> <p>G2 To allow early redevelopment of the Blockworks site, it is proposed that initially this tourist road be constructed only from Cotter Road to a point south of Burton Street.</p> <p>G3 The Dumont Drive-Cotter Road and Duffy Street-Cotter Road intersections are to be reworked to allow for increasing traffic to the Blockworks, Western Park and the lawns, while achieving a degree of separation from Government House traffic.</p> <p>G4 The Western Park road is to be redesigned to the avenue of elm on the nursery boundary to form an extension of the proposed western tourist road.</p> <p>G5 The connection of the tourist road to Alexandria Drive at Dupont Street.</p> <p>G6 The previously gazetted alignment for Constitution Drive, which has never been constructed, is to be reinstated.</p> <p>G7 Alexandria Drive is to be retained as a continuous low speed tourist/recreation route along the lawns with landscaping being progressively made in conjunction with related landscape works.</p> <p>G8 Traffic management measures are to be taken as required to reduce traffic speeds on Howe Street.</p>
<p>2. Communications and Movement</p> <p>The policy is to provide for increased public access to tourist and recreation facilities in a manner which discourages the use of local residential roads for through traffic.</p>	<p>B. Restricted Access Open Space</p> <p>B1 The Royal Canberra Golf Course existing boundary and access is to be retained to allow for the new tourist road. Consideration may be given to the extension of the existing golf course into area B2.</p> <p>B2 The existing alignment area is to be retained as restricted open space for equestrian, equestrian, golf courses or other appropriate uses which reinforce the existing landscape setting in the vicinity of Government House.</p>	<p>H. Pedestrian, Cycle and Equestrian Access</p> <p>H1 A cyclepath is to be provided along the lawns to complete the route from Hooton to City and around Lake Bailey-Golds.</p> <p>H2 Pedestrian access is to be maintained along the lawns and through the Western Park.</p>
<p>3. Landscape</p> <p>The policy is to maintain and enhance the character of Yarralumla and to improve the perception and appreciation of the lawns and environs as an integral part of the National Area.</p>	<p>C. Tourism, Entertainment and Clubs</p> <p>C1 Yarralumla Bay is to be developed for public recreation and tourist activities.</p> <p>D. Public Utilities</p> <p>D1 City Parks Administration Yarralumla Nursery is to be relocated in area. The resulting residual areas will be used for public recreation or reserved access open space.</p> <p>D2 Land uses to be determined.</p> <p>D3 The western boundary of CSIRO Division of Forest Research is to be redefined to allow for the new tourist road. Banks Street Oval may be made available for further CSIRO development.</p>	<p>I. National Capital Uses</p> <p>I1 These areas are to be reserved for National Capital uses in a predominantly landscape setting. Alternative sites for a new Prime Minister's Lodge are to be retained on Murray Past and Spring Ridge.</p>



Reproduction of Attachment No. 48 of 1979
 Approved by the Government
 on 18 November 1979.

Parliamentary Report of the Joint Committee on the Australian Capital Territory (Report on Proposals for Variations of the Plan of Lay-out of the City Of Canberra and Its Environs (Sixty-Seventh Series) 10 May 1979. - Extract – Paragraph 7 and Appendix VII – proposed West Yarralumla Tourist Road (no longer gazetted)

7. In its report on the Sixty-seventh Series of Variations the Committee recommended approval of a cul-de-sac to provide access to the proposed redeveloped Old Canberra Brickworks and as the beginning of a major tourist road in West Yarralumla. In making the recommendation the Committee was particularly aware of the need to ensure that the residential streets of Yarralumla are not overloaded with tourist traffic from outside the area travelling through the suburb to Weston Park and the Lake as well as commuter traffic seeking an alternative route to the city.



SECTION 3 - Issues arising from the Stantec Transport Impact Assessment Forestry

Place 8 November 2023

- *Stantec Transport Impact Assessment Forestry Place is referred to as “Traffic Assessment”*
- *Forestry Place is the site referred to as the “Former Australian Forestry School” in the National Capital Plan Draft Amendment 97*
- *The National Capital Plan Draft Amendment 97 is referred to as Draft Amendment 97*

SUMMARY

In this Transport Impact Assessment (Traffic Assessment), the application of the traffic modelling, intersection counts and traffic assessment to Yarralumla is fundamentally flawed owing to the inherent underlying parameters and assumptions on which they are based. The result is an analysis that is misleading. It substantially underestimates the impacts of the proposed Forestry Place (Former Australian Forestry School) development on Yarralumla, its infrastructure and the interconnectivity of the road network.

As a consequence local traffic and transport issues have not been identified and considered. These matters relate to:

- existing traffic and parking conditions surrounding the site as well as current projects in the area
- the traffic generating characteristics of the proposed development
- the transport impact of the development proposal on the surrounding road network

CONTEXT

The Stantec Traffic Assessment does not recognise the limitations presented by the network of streets in Yarralumla given the volume of traffic carried and the width of the carriageway. Most roads are Access B withs and a number are carrying arterial road level traffic. Of particular note are Weston Street (W) and Bentham Street (Shopping Centre) which have carriageway widths of only 7.4m which will be required to carry the increase in Forestry Place traffic. In addition this section of Bentham Street is not a thoroughfare but essentially a dangerous on-road 90o parking lot which is half the width required by the Australian Standard. Also

the recently upgraded Dudley Street only increased the carriageway width by 1m, this road already carries arterial road numbers of traffic prior to the Canberra Brickworks Precinct Development being built.

Yarralumla Streets - with widths and traffic							
Street	Carriage way width m	Estate Development Code 2020 m	VPD	VPD Weekend	Year	Classification on actual width	Equivalent Classification on VPD
Dudley Street	7	10	9626		2016	Access B	Arterial
Hopetoun (S)	9	10	6910		2014	Access B	Arterial
Hopetoun (mid/Lake)	6.4	10	2176		2006	Access A	Minor Collector
Alexandrina	5.8	10	1917		2012	Access A	Minor Collector
Novar	9.2	10	5320	7260	2014	Access B	Major Collector/Arterial
Weston (E)	9.2	10	2526		2015	Access B	Minor Collector
Weston (W)	7.4	10	1877	2486	2012	Access B	Minor Collector
Bentham (at Shops)	7.4	10	1613		2015	Access B	Minor Collector
Schlich	8.8	10	1267		2006	Access B	Minor Collector
Loftus	7.2	10	1262		2105	Access B	Minor Collector
Banks	9	7	737	1153	2015	Access B	Access B
Kintore (E)	8.8	7	557		2015	Access B	Access B

TRAFFIC MODELLING

Traffic Intersection Counts

Intersection counts taken on 2020 and 2023 are depressed and not representative of normal traffic numbers and patterns. The intersection counts are not disaggregated and unlike mid-block counts do not readily inform internal traffic flows. The SIDRA LOS (Level of Service) modelling of the current rating of intersections is of limited use in identifying impacts and issues in Yarralumla. The analysis does not recognise that the Canberra Brickworks Precinct does not connect directly to the existing suburb by road through existing residential streets but via a new Access Road.

The Stantec traffic Intersection counts were taken on Thursday 3 December 7am-10am and 4 to 7pm and Saturday 10.30am-1.30pm. The Stantec report cites the Cotter arterial road as the indicator that the 2020 figures are representative of normal levels, but this does not hold for the local roads in Yarralumla. This was the start of summer during COVID-19 (pre-vaccine availability) when traffic for outdoor activity at the Lake was highly depressed, as was that to the 23 visitor attractions in Yarralumla. Traffic was not at pre Covid Levels. This is clearly shown by Banks Street traffic counts. The 2020 weekday traffic counts are 29% lower than in

2015 and on weekends 42% lower. The weekend traffic counts in 2015 were 36% higher than on weekdays, whereas weekends were only 22% higher than weekdays in 2020. As such the 2020 traffic figures do not reflect usual usage.

Stantec also took intersection counts on Thursday 20 July and Saturday 22 July 2023 for the intersections of Novar Street with the Adelaide Avenue- Cotter Road Arterial. None were taken within the Yarralumla suburb. These intersection counts taken in mid-winter were 5% to 22% lower than those of early summer 2023 Stantec noted this was most likely due to residual effects of the pandemic with its associated working from home. Notwithstanding this, the available 2023 low traffic volumes have been used for the modelling. The operation of intersections was then modelled using SIDRA using 2020 and 2023 traffic data. Only Novar Street-Dudley Street was low at LOS C meaning "Satisfactory, but crash study required".

Reported Crash data for the area for 2015 to 2019 is 227 collisions over 5 year period. Collisions at the Novar Street-Dudley Street intersection were relatively low at 29 reported crashes (13%), whereas the highest number of reported collisions was 45 (20%) at the Yarralumla Shops Bentham Street (between Banks Street and Mueller Street), but the modelling had the intersection performance at "Good Operation" LOS A (Level of Service A). This was not investigated further. This highlights that the rating of the intersection performance from the modelling is of limited use in identifying impacts and issues in Yarralumla.

Canberra Brickworks Precinct and Forestry Place Development

Canberra Brickworks Precinct does not connect directly to the existing suburb by road through existing residential streets but via a new Access Road. The Forestry Place Development sole access to Yarralumla is via Banks Street. This site has highly problematic access into the suburb and from the broader arterial road network. The streets the modelling shows will carry all the traffic from the Forestry Place Development have specific local issues that preclude this, but these issues have not been recognised.

All the Canberra Brickworks Precinct commercial and retail developments in repurposed buildings and 358 of the 380 residential dwellings will be accessed by a dedicated new Access Road . Construction of this new road "Brickworks Road", at the junction of the Cotter Road and the non-residential Dudley Street, was completed in 2022 and has NO DIRECT road connection to any existing Yarralumla residential streets. For the remaining 22 Canberra Brickworks Precinct dwellings, 9 new dwellings will be built on Denman Street and 11 on Bentham Street, and can only be accessed from these streets.

The Forestry Place Development is of equivalent size and scale to the Canberra Brickworks Precinct but the Site is landlocked by Lake Burley Griffin to the north and the Royal Canberra Golf Course to the west with access only via Banks Street. Banks Street is on the western edge of Yarralumla and has poor interconnectivity with the suburb and to the arterial road network. Adelaide Avenue, the only major arterial road for access to Yarralumla, is at the southern boundary of Yarralumla. Adelaide Avenue can only be accessed from Banks Street via Bentham Street-Novar Street and Weston Street-Novar Street. There are particular local issues

associated with these Streets that are not recognised by the high level desktop modelling and so the inability of these streets to cope with the Increased traffic flows has not been identified.

FUTURE TRAFFIC DEMAND

Forestry Place Development and Draft Amendment 97

The future demand is modelled on:

- 266 Residential Dwellings for the Forestry Place Development, although the Draft Amendment 97 is for 300 Dwellings.
- 130 Aged Care Units for high end Aged Care for the Forestry Place Development. However the Draft Amendment 97 does not define Aged Care nor set parameters. So Independent Living Units for Seniors could be built instead with the associated increase in vehicle movements per day. The traffic assessment has 43 person trips generated for both AM and PM Peaks for high end Aged Care, that is 430 VPD. However if the 130 units were Senior Independent Living there would be a maximum of 260 residents and 780 VPD (130@ 6/unit/day).
- 80 Bed Hotel with function rooms/retail and restaurant access NOT PERMITTED for general public/ non-guests in the Forestry Place Development. There is no such limitation on use in the Draft Amendment 97 and thus traffic numbers should include use by the public. The area for ancillary use for café, bar restaurant is limited to 600 m2.
- Commercial 800m2 for the Forestry Place Development, however Draft Amendment 97 provides for Commercial GFA of 3500m² four and a half times the size. The traffic impact of this needs to be assessed and addressed.
- Community Facility is provided for in the Draft Amendment 97 and the only limitation on this is the total footprint that can be developed of 41,500m2. Community Facility is defined under the National Capital Plan. It has a broad definition that covers establishments for: education, research, cultural Facility, Hospital, Health Centre, Institutional Use, Church Use, and Social/Community Facility. The demand impact for these alternatives has not been assessed except for the theoretical case of a CSIRO expanded to 17,400m2 GFA.

The Forestry Place Development Masterplan, which is indicative only, is expected to generate around 2,320 vehicles per day, including a maximum of 2,060 vehicles per day along Wilf Crane Crescent and 260 vehicles per day along the Aged Care access road. These numbers are in accordance with the Estate Development Code.

Traffic Baselines

There are four different baselines used in the Traffic Assessment. The application of different baselines leads a major underestimate of the scale of the traffic being generated by the development and its impact. There are also major differences between the Forestry Place Development Proposal and the permitted land uses and conditions set out in the Draft Amendment 97 and these give quite different traffic loads, the latter being significantly higher. These aspects are discussed below.

Existing Condition Baseline

The Traffic Assessment uses 2020 figures for the baseline; however, these figures are quite depressed from normal levels. This is clearly demonstrated by comparison of 2015 traffic counts at Novar Street and Kintore by AECOM 4/11/2015 with Stantec for the same area in on 3/12/2020 and 8/12/2020.

Traffic counts corner Novar Street/Kintore		
	AM PEAK	PM PEAK
AECOM 4/11/2015	897	777
STANTEC 3 & 8 /12/2020	549	483
Reduction Actual	-348	-294
Reduction %	39	38

The proposed development site has been vacant since 2019 and hence generated no traffic since that time. The Site entry and exit is Banks Street (and will remain so). The 2020 traffic numbers provided in the Traffic Assessment for Banks Street are 523 VPD weekdays and 668 VPD weekends. However when the Site was operational in 2015 (9,800m2 GFA) there were 737 VPD weekdays and 1153 VPD on weekends Thus the 2020 counts are significantly lower than 2015. That is a reduction of 214 VPD (29%) on weekdays, and 485 VPD (42%) weekends. Of particular note are the traffic numbers on weekends when the CSIRO site was not operating and recreation use of Weston Park and the Lake is high.

Traffic Counts Banks Street				
Year	Weekday	Weekend	% Difference	
			Weekend	Difference
2015	737	1153	36	416
2020	523	668	22	145
Actual Reduction	-214	-485		
% Reduction	29	42		

Future Base Condition with Full development of CSIRO Facility (Hypothetical Baseline)

This is a hypothetical base case, the starting point for the traffic assessment being a theoretical CSIRO of 17,400m2 GFA, which could have been developed under the provisions of the existing lease. That gives a Site starting point that is nearly twice the size (X1.7) of the existing CSIRO facility.

The density of employees for this 17,400m2 GFA development has been assumed by Stantec to be half a normal office and this would result in rates of 0.8 and 0.6 vehicle movements per 100m2 of floor space for AM and PM Peaks which would result in 1218 VPD. This theoretical baseline was developed to show the “net change” in traffic movements and volume between the hypothetical fully developed CSIRO Site and the Forestry Place Mixed-Use Development, rather than the pre 2019 CSIRO Site and the proposed Forestry Place Development.

Masterplan Forestry Place Development

Residential

Traffic Assessment Estimate for 266 Dwellings is 1862 VPD (0.7 X 10 X 266)

Draft Amendment 97 has 300 Dwellings for which estimate is 2,100 VPD (0.7 X 10 X 300)

Commercial

Traffic Assessment Estimate for 800m2 is 112 VPD (1.4 X 10 X 8) or 88 VPD (Stantec Addendum)

Draft Variation Estimate for 2,600 m2 is 364 VPD (1.4 X 10 X 26)

Aged Care

Traffic Assessment Estimate for 130 high end Aged Care Beds is 260 VPD (0.2 X 10 X 130)

Community Facility

Community Facility is not defined in the Draft Amendment and would only be constrained by the overall limitation for development area footprint of the site to 41,500 m2 and so could comprise any mix of Community Facilities and any size. Thus, for example if the proposed High End Aged Care was instead Independent Living for Seniors 130 Units would generate 520 VPD (0.4 X 10 X 130)

Hotel

Traffic Assessment Estimate for 80 Rooms with no public or non-guest access to Function rooms and Restaurant is 152 VPD (0.19 X 10 X 80) or 114 VPD (Stantec Addendum)

Draft Amendment Estimate for Commercial Accommodation limited to 3,500m2 plus 600m2 for café, bar, restaurant accessible to public and visitors 304 VPD (152 X 2)

VPD - Forestry Place Traffic Assessment and Draft Amendment 97

Activity	Traffic Assessment VPD	Draft Amendment 97 VPD
Residential	1862	2100
Commercial	88	364
Aged Care	260	520
Hotel	114	304
Total	2324	3288
Increase %		141

Banks Street Future Demand Scenarios

1. Operation of CSIRO 9,800m2 2016 (pre 2019) VPD contribution (0.7 X10 X 98) 686 with other traffic contributing 88 VPD
2. Hypothetical Baseline CSIRO 17,400 m2 theoretical traffic numbers for Banks Street (0.7 X 10 X 174) =1218 VPD. This is a 78% increase over 2016.
3. Traffic Assessment Forestry Place Development 2324 VPD
4. Draft Amendment 97 Traffic 3288 VPD

Increase in Banks Street Traffic from pre-2019 levels (2016) of 686 VPD:

- with Forestry Place Development is 1,638 VPD (X 3.4 fold)
- with Draft Amendment 97 as applied to Forestry Place Proposal is 2,602 VPD (X 3.8 fold)
- from Hypothetical Baseline of CSIRO 17,400 m2 is 532 VPD, (X 1.7 fold)

Discounting Trip Generation Rates for Local Travel

Stantec Traffic Assessment then further discounts trip generation by 20% for trips internal to Yarralumla. For Yarralumla this discount should not apply as a very significant proportion of trips, are not Yarralumla Residents but from outside the suburb. This is demonstrated by weekend traffic being higher than weekday; in the order of 17% to 56% (based on mid-block counts of Banks and Novar Streets in 2015-16), and that 80% of Primary School students are from out of suburb, similarly with St Nicholas Child Care and Pre School Centre.

Mint Interchange

The Mint Interchange is put forward by Stantec as an upgrade that would improve accessibility and ease congestion around Yarralumla by 2031 and 2041 - this is totally misleading. The ACT Government has not included the Mint Interchange in any transport plans, there is no funding for it, and the main function of the Mint Interchange was to get better access to the West Deakin not Yarralumla. The proposal for a Mint Interchange was developed by the Land Development Agency as part of a much larger Canberra Brickworks Precinct development of 1880 dwellings, not the current 380. There is no plan to proceed with the Mint Interchange and it is misleading to reference it.

Level of Service – Intersection Performance and access through the Suburb

Level of service analysis for intersections under the Masterplan scenario have both the Bentham Street-Novar Street and Weston Street-Novar Street intersections functioning at LOS A “Good Operation” which is not feasible and only the connections at the Adelaide Avenue intersections into the suburb being impacted and dropping from to LOS C “Satisfactory” to LOS D “Near Capacity”.

The Stantec Traffic Assessment Masterplan puts the increase in traffic from existing levels as follows

- Banks Street 500 VPD to 2,300 (but is 3,300 under Draft Amendment 97)
- Bentham Street (at Shops) 2,300 VPD to 3,700

- Weston Street (at Novar Street) 1,500 VPD to 2,100
- Schlich Street 400 VPD to 1,000

This means that 60% of the Forestry Place Development traffic is travelling across the Yarralumla suburb via Banks Street and Bentham Street and 30% via Banks Street and Weston Street to access Adelaide Avenue-Cotter Road.

The Stantec Report finds that “Bentham Street (west of Novar Street) carries daily traffic volumes in excess of the recommend Estate Development Code within the neighbourhood activity centre on both weekdays and Saturdays. Weston Street carries daily traffic volumes consistent with the nominated EDC road class, except on weekdays when values exceed those recommended, west of Hopetoun Circuit.”

Yarralumla Shopping Centre - Bentham Street between Hutchins Street and Novar Streets

Such increased traffic levels through Bentham Street at the Shopping Centre and Weston Street are not viable. Bentham Street at the local Shopping Centre is a 46 Bay on-road 90o angle parking on both sides of the road that is constantly over capacity. This on-road parking is dangerous and does not meet the AS 2890.5 for either 90o or 60o parking the road carriage way is only 7m wide and needs to be over 13m wide to meet the Standard.

The area is impassable except for vehicles parking or leaving, as to exit a parking bay cars must reverse across both sides of the street, precluding its use by any through traffic and creating roadblocks, traffic jams and multiple daily minor accidents.

For the last decade there have been around 10 major accidents reported to the police each year AND many more unreported minor bumps with property damage. There are daily incidents of car damage caused by less serious bumps that are not reported for example that by former Prime Minister Scott Morrison in 2021, and in 2014 one car pushed another over the kerb and into the Gift Shop damaging the street railings on the way (see Pages 12-13).

In 2014 Transport Canberra and City Services advised that some improvement could be possible with the removal of 10 of the parking bays and all the street trees – although this would still not meet the Australian Standard which requires carriageway width of 13m. All this precludes the use of this section of Bentham Street by through traffic.

10	Tony and Lesley Condon	<p>Submission</p> <p>The overall objective of NCA Draft Amendment 97, Block 7 Section 4 Yarralumla (the former Australian Forestry School – hereafter referred to as “the Site”) is to alter zoning of the Site from “community facility” to “mixed-use”. To help achieve this objective, DA97 provides detailed conditions for permitted use of and planning, design and development for the Site.</p> <p>While we both are comfortable with this re-zoning from “community facility” to “mixed use”, we would like to take this opportunity to suggest changes to some of the detailed conditions within DA97 so as to enhance this new use of the Site, for its new occupants and for existing Yarralumla.</p> <p>Suggestion 1. Building setbacks: An 80m setback from Banks Street be applied for any new development <u>in the south of the Site</u>. Modify Figure 115 to show this setback.</p> <p>This Suggestion 1 relates to the first three intents of the policy proposed by DA97 Section 1.9.3, to:</p> <ul style="list-style-type: none"> • Ensure all development contributes to the natural character and landscape setting of the site. • Retain and strengthen the site’s landscape setting, while promoting new tree planting and species that will enrich the site’s beauty, shade, shelter, and enhance the built environment. • Ensure development exhibits design excellence in architecture, landscape architecture and urban design. <p>DA97 Figure 115: Development controls for Block 7 Section 4 Yarralumla, provides, <u>in the north of the Site</u>, for a setback of 80m from Banks Street for any new development in that area. An 80m setback from Banks Street <u>in the south of the Site</u> would provide some overall symmetry to the Site’s development.</p> <p>Much more importantly, a setback of 80m from Banks Street in the south of the Site would make a substantial contribution to the DA97 intent to “retain and strengthen the site’s landscape setting, while promoting new tree planting and species that will enrich the site’s beauty”. This southern setback from Banks Street is currently occupied by two north-south aligned ‘features’: a strip of</p>
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grass area on the eastern edge, and a formal planting of *Atlantic Cedar* west of the grassed area. To the west of this formal tree planting there is a sloping area currently dominated by numerous *Pinus radiata* trees, along with some other tree species. All of these features could be retained and/or enhanced in the proposed development using the same or different species.

An 80m setback from Banks Street in the south of the Site would allow this treed area to be retained as an existing shared space between urban Yarralumla and the Site. This would help contribute to “excellence in landscape architecture and urban design” that takes some account of the interaction of the Site with the existing urban landscape of Yarralumla. Many residents of Yarralumla’s west make use of this area for walking, by themselves or with dogs, and for other recreational activities. We would be keen for this area to be retained and enhanced.

A setback of 80m would also greatly assist to “retain and strengthen the Site’s landscape setting”. The Proponents plan indicates that the bulk of the Site will be dominated by areas where trees have the challenge of “co-existing” in close proximity to existing heritage buildings and several newly-constructed buildings. This challenge for the trees would be greatly reduced in this area of the Site if there was an 80m setback. Also, a setback of 80m from Banks Street, in the south of the Site, would assist in achieving the Plan’s requirement that a minimum of 60% of the Site be designated for open space.

Having an 80m setback from Banks Street may result in a small reduction of dwelling numbers in the southern precinct of the Site. It may be that this loss can be compensated by raising dwelling numbers in the western and north-western precincts of the Site. This would allow more residents in those precincts to enjoy expansive views over the Royal Canberra Golf Course tree-scape and beyond, to the Lake and even to the National Arboretum.

Suggestion 2: Shift the northern arm of Wilf Crane Crescent a few meters to the south, so that it no longer abuts directly against the heritage Old Forestry School building. And also widen this section of Wilf Crane Crescent so that it can carry two-way traffic.

The northern arm of Wilf Crane Crescent is very narrow (ca. 4m) and the northern edge of its bitumen surface is, literally, directly against the southern wall of the Old Forestry School building, a Heritage building. Vehicle use of this piece of road already generates high physical risk to the building structure. This risk will be substantially magnified if this arm of Wilf Crane Crescent is used to distribute Site traffic to/from Banks Street. The building’s heritage significance needs to be protected!

A possible solution would be to rebuild this arm of the road so that it runs in the same direction but sits several meters to the south, away from the Old Forestry School building. To achieve this, the eastern part of the site boundary abutting the northern edge of the Forestry Oval site will need to be moved several additional meters south. This would also allow the road surface to be widened to enable safe two-way traffic movement in the north part of Wilf Crane Crescent. Achieving this outcome would involve re-acquiring what was previously some NCA land but is now ACT Government land. While it might be considered that this process of land re-

acquisition could be a drawn-out one, the ACT Government may actually be quite sympathetic to the idea, given that the draft DA97 is working to support the ACT Government, and Federal Government, policies of increasing housing supply. If the Site is to function well as an urban development into future decades, then a two-way traffic route onto Banks Street is needed in this northern part of the Site.

Suggestion 3: Institute measures to reduce traffic pressure in central Yarralumla.

3.1: Ensure an exit road from the western boundary of the Site.

A new, second exit from the Site will be required if the northern arm of Wilf Crane Crescent cannot be effectively altered to carry two-way Site traffic. If the Site traffic flow is restricted to the only currently-available exit, i.e. the southern arm of Wilf Crane Crescent, then substantially more traffic pressure will be imposed on central Yarralumla (i.e., the Yarralumla shops at Bentham Street and the Banks St/Weston St traffic route). A second exit from the Site is needed to alleviate that pressure.

The only possible location for a second traffic exit from the Site is along the western boundary, onto the Royal Canberra Golf Course (RCGC) site. There can be no exits onto Bentham Street along the southern boundary of the Site, and no exits into the Westridge House site on the northern boundary. On the western boundary, a traffic exit street could enter the RCGC site and immediately turn north, following the Site boundary to enter Banks Street north of the Westridge House site. To reduce traffic pressure in central Yarralumla even further, this second exit street could also function as a new entrance to the RCGC, with the current RCGC entrance from the western end of Bentham Street being closed to RCGC traffic.

3.2: Move the Royal Canberra Golf Course entrance to Dunrossil Drive.

If a second traffic exit from the Site cannot be achieved on the western boundary of the Site, then another way to partially mitigate the added traffic pressure that the Site will place on central Yarralumla would be to move the RCGC entrance away from Bentham Street.

The current entrance to the RCGC is at the western end of Bentham Street. To access this entrance to RCGC all golfers, club-house guests, staff and service vehicles must pass through Yarralumla then along Bentham Street. This means that a considerable amount of traffic passes through Yarralumla every day just to get to and from RCGC.

If it is not possible to achieve a new entrance to RCGC from the north of the Westridge House site (see above), a new entrance to RCGC could instead be located about half-way along Dunrossil Drive, where there is already a well-used entry gate from Dunrossil Drive into RCGC. This gate is currently used by many vehicles (semi-trailers, trucks and cars) as the RCGC works on substantial

		<p>fairway amendments. We suggest that the same entrance be used, in the future, by all golfers, club-house guests, staff and service vehicles needing to access the RCGC.</p> <p>Suggestion 4: Improve and correct the information provided in Section 4.12.5 – Detailed conditions of planning, design and development.</p> <p><u>One example:</u> In Figure 115, the information provided must include the names of adjacent streets.</p> <p>Subsection: Building Setbacks</p> <p>There is a single sentence in this Subsection, that states:</p> <p style="padding-left: 40px;">“Minimum building setbacks are shown in Figure 115.”</p> <p>But Figure 115 shows no street names, so the location of the setbacks has no context relating to why these setbacks have been specified.</p> <p><u>A second example:</u> Figure 116, the location shown for the OLD CANBERRA BRICKWORKS REDEVELOPMENT.</p> <p>This is NOT the correct location. The location shown is a long-standing residential area in Yarralumla.</p> <p>The site for the Old Canberra Brickworks Redevelopment is further to the west, butting against Bentham Street beyond where Bentham Street turns to the north-west. The eastern boundary of the Old Canberra Brickworks Redevelopment butts against existing dwellings on the western edge of this residential area of Yarralumla.</p>
11	Australian Garden History Society	<p>I write to you as Chair of the local Branch of the Australian Garden History Society (AGHS). AGHS is a national organisation with a mission to promote awareness and conservation of significant gardens and cultural landscapes through engagement, research, advocacy and activities.</p> <p>I wish to make the following comments as part of the NCA consultation.</p> <p>The Australian Forestry School site in Yarralumla is a national culturally significant, and a locally appreciated, heritage place.</p> <p>By entry on the Commonwealth Heritage List the former Australian Forestry School site gained official recognition for its importance as part of the history of landscape development in Australia, as well as the history of Canberra. Its heritage values include historic, research, aesthetic, representative, technical, social and associative aspects. It is especially noted as having</p>

importance as the place of the earliest Australian nationally coordinated forestry training, and as a key location for national forestry research throughout the twentieth century. As such the place deserves, and under the provisions of the EPBC Act, requires conservation and protection during any proposed development.

The 2020 ERM *Heritage Assessment Former CSIRO Forestry Precinct Yarralumla* confirmed these values and identified the importance of the site for its rarity, being the only national forestry school in Australia, with additional significance in contributing to plantings and afforestation in the Canberra landscape since 1913. In addition several significant plant groupings at the site were identified by ERM research. This assessment should inform conservation of the site.

The ERM 2021 *CSIRO Yarralumla (Forestry Place) Heritage Impact Assessment* itemises seven recommendations for conservation (pages 98-102) that AGHS strongly supports to be included in a final Draft Amendment.

1. To engage suitably qualified heritage professionals (architect and preferably also a landscape specialist) to ensure appropriate conservation of heritage fabric and values at the site during any further planning and development works. In fact all further development at the site should be mindful of heritage values before changes are implemented. ERM's recommendation of a 20m buffer zone around significant buildings is also noted as worthy of implementation.
2. This conservation is to be guided by the development of a new Conservation Management Plan (CMP) for the whole site so that the development process and proposed adaptive reuse is consistent with the Burra Charter principles that are recognised in the EPBC Act. It should be noted that a CMP is different from a Masterplan, and, for satisfying conservation, Burra Charter and EPBC requirements, should precede and inform such planning and implementation.
3. The site should receive interpretation attention as itemised by ERM to reveal and explain its heritage significance.
4. The reconstruction of a glasshouse in accordance with archival recordings is supported as an interpretative instrument.
5. Retention of trees wherever possible, as recommended by ERM.
6. Selective replanting as noted by ERM.
7. Preparation of a photographic recording of all buildings and plantings prior to any development or removal, so a record of the predevelopment site is kept for posterity. Such a record could also be used after development to gauge and repair any damage arising from the works process. This recording should be lodged in a publicly accessible location such as the ACT Heritage Library. The ERM Heritage Assessment should accompany such a deposit to the library as explanatory background.

I thank you for this opportunity to comment and I look forward to your reply.

12	John Konstantinou	<p>I have concerns relating to the draft variation namely:</p> <ul style="list-style-type: none"> • The Stantec report classifies Banks Street as minor collector, although this would be an access Road B at best, noting that the access road Hutchinson Street has priority over Bentham Street. • Traffic generation rates are in line with what we used at Gold Creek. • A “discount” to the traffic numbers is apparently applied in Section 7.4, but it is unclear how this is applied in the modelling. Noting that the local intersections within Yarralumla are being modelled, these vehicle trips should still apply. • The report does not consider the implications on the residential driveways at 26 and 28 Banks St, Yarralumla ACT 2600 that are within the intersection. Has an option to redirect the Wilf Crane Cres onto Hooker St which leads straight onto Novar St been reviewed. • Lights from vehicles will affect the house (unless the traffic can be resolved) • Noise from vehicles starting and stopping will affect the residences. • General Open space and activity space that is not part of the oval? <p>These are major concerns, and if they are wrong, they can lead to significant prolonged and continued issues; please provide further information on the above as it is not clearly addressed and seems to provide discounts for no apparent reason.</p> <p>These issues will certainly affect the access to the residential driveways at 26 and 28 Banks St, Yarralumla ACT 2600, more than any other residents.</p> <p>The significant impact on amenity and loss of amenity and public safety with the increased traffic, I don't believe, been addressed accordingly.</p> <hr/> <p>Thank you for your email.</p> <p>Whilst i have concerns, i believe sensible approaches can result in a great outcome for all. But it needs to be addressed within the NCA Traffic and subsequent TCCS as a matter of importance and priority.</p>
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Hi,

The proposal for the Forestry Place development, specifically the proposed traffic arrangements for the connection to Banks Street have some unaddressed questions and assumptions.

These comments relate to traffic and pedestrian safety that seem to be unaddressed or modified to look like they meet acceptable criteria.

The report generally looks to address the required elements for the impact Assessment but a few key elements of the traffic report we believe need further information or clarification. These include:

Operation

- Provide clarity on the operation of the Aged Care including number of employees and peak traffic generated by the Aged Care facility. The reports does not cover off these elements and cannot be related back to the overall traffic assessment.

Traffic Generation

- Provide explanation as to the 15% reduction in peak vehicle trips generated by the overall development. The report does not provide suitable justification as to what the reduction is applied to, why it is applied or, where it is applied and it is unclear as to how the reduced number of trips are represented in the overall Yarralumla Traffic model.

Vehicle Access

- Vehicles accessing the site off Banks Street are nominated to have a 50/50 split between the north and south connections of Wilf Crane Crescent. As the majority of vehicles are approaching and departing to the south we believe the split will be closer to 75/25 with the majority of vehicles using the southern intersection. Additional justification of the nominated 50/50 split should be provided or the traffic model should be updated to represent the increased number of vehicles through the southern connection of Wilf Crane Circuit to Banks Street.

Anticipated Traffic Impacts

As requested we have looked at the southern connection between Wilf Crane Crescent and Banks Street using a Safe Systems Assessment considering

- Traffic volumes,
- Traffic speed,
- Pedestrians,
- Cyclists, and
- Road Reserve characteristics.

and believe further information is required to address the following traffic safety concerns:

- How is speed along Banks Street being managed? Assessment of the section of Banks Street north of Bentham Street indicates the characteristics of a 60km/hr speed zone, not a 50km/hr Speed zone. Has an assessment on existing vehicle speeds been carried out? Are there any issues around existing vehicle speeds and if so and what is the development proposing to implement to control vehicle speeds into and out of the development on Banks Street.
- The southern connection of Wilf Crane Crescent to Banks Street increases the number of vehicles through the intersection from 57 to 229 in the Peak AM period (400% increase) and from 71 to 216 in the Peak PM period (300% increase). We believe the actual increase in traffic through the intersection will exceed the nominated volumes as the traffic split between the north and south connections of Wilf Crane Crescent is not believed to be 50/50.
- The increase in traffic through the southern connection of Wilf Crane Crescent is anticipated to have an impact on the safety of cyclists and residents in this location due to:
 - Banks Street having on street parking permitted through the intersection on the eastern kerb.
 - The useable pavement width being variable along Banks Street, ranging from nominally 7.62m down to 7.1m, with on street parking taking up nominally 2.4m of the available carriageway. Allowing for safe passing of on road cyclists and on street parking and a single vehicle travelling either north or south on Banks Street a carriageway width of 7.1m indicating that two vehicles could not pass each other on Banks Street if another vehicle was parked kerb side or there was an on road cyclist.
 - The intersection whilst compliant with AS2890.1 is near the residential driveways of 26 and 28 Banks Street. The increase in traffic at the adjacent intersection will have an adverse impact on the reverse in or out movements

		<p>required to enter or exit these adjacent residential driveways and should be considered in the context of the increased traffic volumes associated with the development.</p> <ul style="list-style-type: none"> ○ We understand that the road drainage system on Banks Street does not constrain stormwater runoff to the road reserve and stormwater overflows into adjacent residences. During times of inundation the useable width of Banks Street will be reduced and will have an impact on the capacity and safety of the intersection connection of Wilf Crane Circuit and Banks Street. <p>We believe an alternate option for connecting the proposed development to Banks Street at Hooker Street in the form of a T-Intersection will achieve the following safety improvements:</p> <ul style="list-style-type: none"> ● Locate the intersection where on street parking is currently not permitted, effectively increasing the available carriageway width and improving intersection safety. ● Stormwater flows towards Banks Street could be better managed before the connection to Banks Street, alleviating on street inundation and thus increasing the safety of this section of road. ● Locating the intersection away from residences and reducing the conflict between vehicles entering and existing adjacent residences and vehicles turning into and out of Wild Crance Crescent. <p>I am happy to discuss.</p>
13	David McKean	<p>I offer the following comments on the draft Development Application 97 relating to Block 7 Section 4 Yarralumla.</p> <p>I also note that the Yarralumla Residents Association will be commenting on the Application in a far more comprehensive manner, and I would urge the Authority to give serious consideration to the matters they raise.</p> <p>First, I note much of the residential development in the old south Canberra is largely comprised of residential properties, 1 or 2 story in height. I would urge the NCA to ensure this development conforms to that standard and therefore modify the effective 5 story limit proposed in DA97. I say 5 stories because in addition to the 3 stories highlighted in the draft, the proposed addition of attics and above ground basement effectively gives rise to 5 stories. I have no objection to basements as long as they are below ground level.</p>

		<p>Second this is one of several developments planned or proposed for Yarralumla. These include the Brickworks, the ACT Government has recently allowed much of the suburb to morph into medium density housing, while the foreshadowed tram to Woden is likely to lead to high density housing near Adelaide Ave. Individually, and certainly cumulatively, these developments will have a significant impact on existing infrastructure such as: roads, schools, water, electricity, health, shopping, recreation facilities, child care etc. It would appear in considering these proposals the NCA, Federal and Territory Governments will fail to take a holistic view on their impact and, significantly, will fail to ensure funding is available to address any infrastructure failures. These aspects should be considered and resolved prior any further development approvals.</p> <p>The principal proponent for this Development Application is The Shepherd Foundation, which according to the Australian Charities and Not-for-profits Commission, is a very small organisation. In its most recent Annual Information statement it has no employees and revenue of \$39,503, According to the ACNC web site the Foundation is overdue in submitting its Information statement and financial report for the 2023 year and the 2022 report was submitted 8 days ago while it was due 15 months ago, 30 September 2022. Given this information the NCA needs to give serious consideration as to whether the Foundation has the governance, capacity and capability to undertake a development of the proposed size.</p>
14	<p>Environment Planning and Sustainable Development Directorate (ACT Government)</p>	<p>Thank you for the letter dated 13 November 2023 providing the ACT Government with the opportunity to comment on DA97.</p> <p>DA97 proposes to change the land use policy of Block 7 Section 4 Yarralumla from Community Facility to a mixed-use zoning allowing residential, social housing, aged care, commercial accommodation, community facility and ancillary commercial uses. Da97 also proposes to introduce detailed conditions of planning and design to guide future development of the site.</p> <p>I am pleased that the National Capital Authority (NCA) has considered and responded to the initial views expressed by the ACT Government in 2021 regarding the site redevelopment proposal, and also undertaken further consultation with key stakeholders.</p> <p>The proposal has been circulated to ACT Government agencies for feedback and a summary of the key comments provided during circulation are provided below:</p> <p><u>ACT Education Directorate</u></p> <ul style="list-style-type: none"> • ACT Education will require, as redevelopment of the site proceeds, details of the quantum, and structure type of the dwellings planned. This will support ACT education’s school planning task for Yarralumla and surrounds.

ACT Heritage Council

- The ACT Heritage Council recommends that the significant features of the place, as registered on the Commonwealth Heritage List, are retained, and conserved, as part of this National Capital Plan amendment and the proposed redevelopment.

Transport Canberra and City Services Directorate (TCCS)

- TCCS notes that the masterplan is designed to allow high-quality pedestrian / bicycle paths and connection to the Brickworks, by facilitating a new shared path on the western side of Banks Street between Bentham Street and Brown Street, and the western side of Wilf Crane Crescent. TCCS is supportive of these connections being carried forward as part of an overall active travel network that links the development with the surrounding neighbourhood and that the connections be further developed as off-site works when the proposed amendment progresses to any development applications.
- The proposed development is expected to have a moderate and manageable impact onto the surrounding road network.
- In terms of car parking, TCCS notes the intentions to deliver on-site parking that aligns with our equivalent Territory Plan requirements including a mix of surface-level and subterranean-level car parking for residents, visitors, and employees. It is understood that the final car parking numbers are anticipated to be determined at the works approval stage of any future development. TCCS requests further engagement with the NCA in addressing this aspect of the project and TCCS may seek further details during the works approval stage to ensure that the specifics of the parking arrangements are also compatible with any existing parking in the public domain.

Icon Water

- The proposed Option 2 augmentations of existing sewer network capacity is acceptable to deliver the additional sewer flow.
- Existing water infrastructure within block boundary is not sufficient to service proposed development. A new network will be required and the development might trigger augmentation to existing reticulation network. Detailed analysis will be required once further development information becomes available.
- No deviation from Icon Water standards is supported as part of this application. The development will need to ensure all necessary relocations and protection is undertaken for all Icon Water assets per the relevant standards.

Other Government stakeholders either had no comment, no objection, feedback that related to matters at development application or works approval stage or indicated support for the proposed draft amendment.

		Thank you for your consideration of these comments in finalising DA97.
15	Richard and Jennifer Lawson	<p>We make the following comments about Darft Amendment 97 (DA97) to the National Capital Plan:</p> <p>Public consultation: The NCA has been deficient in seeking adequate community input to the proposed draft amendment. As adjacent property owners to the land in question, we only found out about the public drop-in session from our Bentham Street neighbour. Unlike the adjacent Brickworks development there has been no direct contact with nearby residents by either the developer or the NCA, nor has there been any signage on the property signalling a potential change in land use. We suggested the NCA do a letter drop to advertise the second public drop-in session to ensure neighbouring property owners were aware, but this did not happen.</p> <p>The change to mixed-use zoning: Any change to the property's land use or development approval should mandate a social housing component. The developers should not be allowed to convert what is a community-use site to mixed-use without providing for social or affordable housing.</p> <p>Building height restrictions: Should be mandated by a specific height, not the number of storeys. The so-called three-story apartment blocks proposed for near the Banks Street entrance to the property include a basement up to 1.2 metres above ground level and, an attic of unspecified height. The plans give no indication or recommendation as to the total height of the apartment block which allows for developers to virtually build four-storey buildings.</p> <p>Parking and access requirements: The proposed plan does not provide sufficient parking places for visitors. Such a deficiency raises concerns about the use of Bentham Street as a defacto visitor parking area for the development. Together with the adjacent Brickworks development, that likelihood raises concerns about congestion and safety.</p> <p>Having only one suitable access road to the property will significantly increase traffic on Banks Street between Hooker and Weston Streets and impact noise and safety.</p> <p>Traffic impact: The traffic assessment by Stantec is simply another example of a consultant writing a report to validate the preconceived position of its client. The figures about vehicle movements are nonsense, as is the suggestion that any increase will have minimal impact on nearby streets.</p> <p>The impact on Hooker, Bentham and Hutchins Streets, especially in the vicinity of the Yarralumla shops, will pose significant traffic and parking challenges for existing residents.</p> <p>Overall the increase in traffic from the proposed development's residents, hotel employees and guests, plus aged care residents</p>

		<p>and visitors will significantly increase the number of traffic movements in the suburb leading to increased traffic noise and reduced amenity for current residents.</p> <p>Tree cover and landscape: Any approval should ensure existing trees are maintained, especially in line-of-sight areas between neighbouring properties and planned new residential buildings. Or, if the age of the existing trees doesn't allow for this, it should be mandated that the developer begin planting new trees to allow for sufficient growth before the buildings are constructed.</p>
16	Forestry Australia	<p>Forestry Australia is the professional body representing over 1000 members who are forest scientists, professionals and managers operating in all aspects of forest and natural resource management, across Australia and internationally. We appreciate the opportunity for consultation and to comment on Draft Amendment 97.</p> <p>Forestry Australia remains of the views expressed in our letter of 23 August 2021 (attached) on this issue; that is, we support the intentions of DA97 (with minor variation, as noted below) as listed on the consultation webpage:</p> <ul style="list-style-type: none"> • Ensure all development contributes to the natural character and landscape setting of the site. • Retain and strengthen the site's landscape setting, while promoting new tree planting and species that will enrich the site's beauty, shade, shelter, and enhance the built environment. • Ensure development exhibits design excellence in architecture, landscape architecture and urban design. • Conserve the heritage significance of listed buildings including areas of associated fabric, settings, and views. • Maintain public pedestrian access through the site and maintain access to the adjoining public playing field. • Encourage sustainability as a base requirement for all new buildings and in landscape design and site management." <p>As expressed in our letter of 23 August 2021, we are concerned with the preservation of the heritage values of both the site as a whole, as manifest in its landscape character, and of the buildings, including but not limited to those that are heritage-listed (i.e., Forestry House, the Museum Building, and Seed Storage Building, as well as the Australian Forestry School). As we wrote previously:</p> <p style="padding-left: 40px;">We contend that respect for and maintenance of the landscape character and heritage buildings of the site are fundamental prerequisites for any redevelopment of the site, whatever its zoning, administration and use. In addition to the points we have made above, we suggest that building height and density should be limited to those which ensure the treed, arboretum character of the site, which defines its attractive landscape character, is maintained over the coming century.</p> <p>Our primary concern, should the Amendment be approved, is that the site and buildings of historical significance should receive protection under the ACT Heritage Act 2004. We are therefore concerned that the current protections be maintained in any change of approved land use and process of transfer of the site from Commonwealth to ACT Government authority; we are pleased to note</p>

		<p>the owner’s and developer’s positive intentions in that regard. Should that transfer of authority eventuate at some point in the future, Forestry Australia intends to work with other interested parties to nominate the site and relevant buildings for registration and protection under the ACT Heritage Act 2004</p> <p>Members of Forestry Australia would appreciate continuing to be informed of the progress of the NCA’s consideration of the Draft Amendment, and to engage with future consultations and discussions about the future of the Australian Forestry School site.</p>
17	David Harvey	<p>I support the issues raised by the Yarralumla Residents Association in tis submission concerning this Draft Amendment.</p> <p>I would also like to highlight the following issues that appear evident to anyone with an understanding of Yarralumla, but may have been overlooked in the myriad of concerns relating to the development of Block 7 section 4, Yarralumla.</p> <ol style="list-style-type: none"> 1. Draft Amendment 97 is being driven by a concrete proposal that is on the table concerning redevelopment. However, once an amendment is approved, there would be nothing to prevent the current owners from selling the land to another developer. This could result in a new proposal designed within the constraints of the National Capital Plan after it is amended. Consequently, there are concerns about what other development could fit within an amended National Capital Plan. 2. The proponent’s plan to prohibit parking on Banks Street in the vicinity of the development would be unacceptable to existing residents on Banks Street. 3. The proponent’s plan to reroute the bus along Banks Street is totally impractical as Bentham Street lacks capacity for large vehicles in front of the shops. 4. The proponent’s suggestion that dining spaces within the hotel might be restricted to hotel guest only in order to justify how car parking requirements could be reduced suggests there would need to be terms in the lease to enforce such restrictions in perpetuity. Since this is unlikely to occur, any car parking requirements should factor in public use of the hotel facilities. 5. The proponent’s suggestion that there will only be 8 employees at the hotel that would then only require 8 car parking spaces, appears to be grossly inadequate for an 80-bedroom hotel with a restaurant and function room. 6. The proponent’s suggestion that there will be peak staff of 26 at the aged care facility when calculating the car parking requirements appears inadequate given the legislated requirements for aged care facilities to provide 215 minutes of care per resident from October 2024. 7. Since the proponent plans to build a hotel, which is a tourist service, the ACT legislation will require signage to indicate the access route from Adelaide Avenue. <p>You would appreciate that traffic flows will be affected by the location of the signage to the hotel and it would help the community to have a better understanding of the implications for local street if you could disclose how the signage will</p>

		<p>direct traffic between Novar Street and Banks Street and whether this will be via Weston Street, Bentham Street, Hooker Street or Schlich Street.</p> <p>8. It should be noted that future traffic and parking on Bentham Street is also expected to increase due to the development of the Canberra Brickworks Precinct. Apart from the standalone houses planned for Bentham Street and a new cul-de-sac off Bentham Street, Lane-Poole Place will provide a convenient access point for entering the heart of the Canberra Brickworks Precinct from the Yarralumla side of the development. Bentham Street and Lane Poole Place are also likely to experience spill of visitor parking (and particularly employee parking) since the public parking space within the Canberra Brickworks Precinct is to be a commercially-operate paid car park.</p> <p>These are a sample of some of my concerns with the scale and type of development proposed.</p>
18	Jane O'Donohue	<p>To follow are my comments on the National Capital Plan Draft Amendment 97 - Block 7 Section 4 Yarralumla (former Australian Forestry School).</p> <p>I preface my comments on this proposed draft amendment by noting the Plan's requirement to consider key matters of national significance, which include:</p> <ul style="list-style-type: none"> • <i>The pre-eminence of the role of Canberra and the Territory as the centre of National Capital functions, and as the symbol of Australian national life and values.</i> • <i>Conservation and enhancement of the landscape features which give the National Capital its character and setting, and which contribute to the integration of natural and urban environments.</i> • <i>Respect for the key elements of the Griffins' formally adopted plan for Canberra.</i> • <i>Creation, conservation and enhancement of fitting sites, approaches and backdrops for national institutions and ceremonies as well as National Capital uses.</i> • <i>The development of a city which both respects environmental values and reflects national concerns with the sustainability of Australia's urban areas.</i> <p>https://www.nca.gov.au/planning/plans-policies-and-guidelines/national-capital-plan#, 17/12/23)</p>

On the *development of a city which both respects environmental values and reflects national concerns with the sustainability of Australia's urban areas*, Yarralumla is currently seen as a quiet leafy and restful suburb. The following words and phrases were used by the Allhomes website listing properties in Yarralumla for sale on 17 December 2023:

"[property] situated in lovely Yarralumla, amongst the embassies, established buildings and greenery"

"[property's] proximity to iconic landmarks such as Parliament House, the serene shores of Lake Burley Griffin, the renowned Royal Canberra Golf Club"

"opposite parkland"

"the exclusive enclave of leafy Yarralumla"

"living in Yarralumla means embracing a lifestyle of convenience, sophistication, and natural beauty"

"serene neighbourhood"

"the beauty of the surroundings"

"exclusive leafy street"

"positioned in the quiet end of a friendly Yarralumla street with excellent access to Lake Burley Griffin"

"in a super prime location opposite reserve"

It seems that these valued attributes of Yarralumla will be significantly affected by a substantial expansion of residential living on the edge of the suburb, away from arterial roads. Cars leaving the proposed development would need to cross other parts of the suburb to get to these roads, adding to overall noise and to congestion at busy times, and also adding to pedestrian safety risks.

Further, the redevelopment will result in the removal of mature trees. This will further reduce the natural amenity for current residents and for visitors to locations such as Weston Park.

As such, the proposed scale of development seems inconsistent with this key matter.

A second key matter relevant here is the *Conservation and enhancement of the landscape features which give the National Capital its character and setting, and which contribute to the integration of natural and urban environments*. The proposal is to provide for a three storey plus attic limit on the height of the development. A development to this height would dominate the skyline in this part of the suburb and would appear to be inconsistent with this key matter.

Turning to the streetscape around the proposed development, I refer to a third key matter, *The pre-eminence of the role of Canberra ... as the symbol of Australian national life and values*.

		<p>Specifically, the naming of Banks Street after Sir Joseph Banks recognises his role in the understanding and appreciation of Australia’s botanical heritage. This was further recognized in 1967 when a portrait of Sir Joseph was included in the new \$5 bank note.</p> <p>For this reason alone mature tree plantings on Banks Street should be retained</p> <p>Further, the woodland on the corner of Forestry Oval opposite Solander Court is rare in Canberra. As woodland habitat it would not be replaced by plantings for many years, if ever. To illustrate how this operates as bird habitat, as well as a tranquil setting, I have attached a video recording made on 11 September 2023.</p> <p>It would seem that on current plans this woodland would be retained. If not, and for the reason above, it should be both retained and protected during construction.</p> <p>I trust my concerns and suggestions will be taken into consideration in the NCA’s detailed conditions for planning, design and development.</p>
19	Michael Lewis	<p>Size of Proposed Development</p> <p>One of the objectives of the proposed amendment is to <i>retain and strengthen the site’s landscape setting</i>.</p> <p>However, a development of this size, with the proposed number of buildings, will irreversibly destroy the current landscape setting and natural character of the site and obliterate the protected heritage values of the site. A smaller development with fewer buildings will reduce the negative impact on the landscape setting.</p> <p>Increase in Traffic</p> <p>The increase in traffic generated by a development of this size will seriously impact the safety and amenity of local residents. A smaller development will generate a smaller increase in traffic.</p> <p>Flawed traffic analysis</p> <p>The analysis of the impact of the traffic generated by the development is seriously flawed and underestimates the increase in vehicle numbers. Even then, it acknowledges that the traffic on Novar St will exceed acceptable levels but claims the Mint Interchange will alleviate this problem. The prospect of a Mint Interchange is non-existent. It is not on any traffic plan and has no</p>

funding allocated. If one were to be built, it would have to be built before Light Rail Stage 2B commences. There have been no reports that this will happen.

The traffic analysis would appear to have been a desktop review that fails to recognise the reality of Yarralumla traffic especially the traffic congestion at the Yarralumla Shops on Bentham St. Given Yarralumla's road network, traffic generated by the development will have no other option but to travel along residential streets.

The analysis also fails to take into account the proposed redevelopment of Minimbah Court on Schlich St opposite the proposed development. This development could be up to 69 apartments.

Parking

The Draft Amendment notes that parking should comply with ACT Government planning requirements. Adherence to ACT government standards only, especially the reduced parking requirements announced recently, will compromise the draft amendment's key objective of contributing to the natural character and landscape setting of the site.

It is understood that the developer proposes to use Wilf Crane Crescent for visitor parking. If allowed, this will further destroy the landscape setting of the site.

Much stricter parking infrastructure should be specified in the draft amendment including all residential and visitor parking must be off road. Furthermore, the draft amendment should include a requirement, similar to that required in the National Capital Plan for the ACT Hospice site, that a parking space be provided for each aged care bed and staff member. Plus, there should be additional parking capacity on site to handle aged care shift changes and visitors.

In order to minimise noise and other disturbance to nearby residents, there should also be a requirement that service areas such as delivery bays and garbage pick-up points are located well away from existing dwellings.

On-going landscape maintenance

The draft amendment is silent on how any new tree plantings will be maintained once the development is completed. Arrangements for on-going maintenance should be specified in the draft amendment. The arrangements proposed for the Canberra Brickworks Redevelopment could serve as a model.

		<p>Conclusion</p> <p>A development of half the number of proposed residential buildings will still achieve the objectives of the draft amendment, while reducing the negative impacts on the heritage landscape setting and the loss of amenity to existing residents caused by increased traffic.</p>
20	Greater Canberra	<p>Summary</p> <ul style="list-style-type: none"> • Greater Canberra supports the development of the former Australian Forestry School site to increase housing supply and amenities in the inner south. • We do not support the proposed 3-storey height limit for the precinct, instead preferring the proponent’s original proposal with a 5-storey building profile. • Given the site’s location, we would encourage the NCA to reduce parking requirements and plan for strong integration of the development with pedestrian and cycling networks. <p>Overview of amendment and proposed development</p> <p>The former Australian Forestry School site is a prime location for additional housing and amenities within central Canberra. Despite being well located close to Parliament House and employment centres, currently the site is under-utilised. While parts of the site are environmentally valuable, existing buildings are of limited environmental or community value. The site is also located within Yarralumla, one of Canberra’s most expensive suburbs, and one that has suffered as a result of restrictive planning rules that have limited opportunities for more abundant and affordable infill housing.</p> <p>The current lack of housing in central areas affects all Canberrans, in particular those within nearby communities who are looking for a first home, or looking to downsize to more suitable housing later in life. Providing more housing and amenities in inner urban areas like Yarralumla is also essential if Canberra is to rapidly reduce its transport emissions and limit environmentally costly suburban sprawl, consistent with ACT Government policy. For these reasons, Greater Canberra strongly supports the development of the precinct.</p> <p>Restrictions on built form</p> <p>The draft amendment places several limits on the built form of the proposed development. We are supportive in particular of those restrictions that seek to maximise green space, both for community use and for environmental conservation purposes. However, we are concerned about the proposed restrictions regarding building height and site set-backs.</p>

Building height

The draft amendment specifies that buildings shall be a maximum of 3 storeys, not including a basement level. We understand that the initial proposal brought by the proponent included plans for buildings up to 5 storeys tall, but that these plans were changed largely as a result of advocacy from the Yarralumla Residents Association, who were broadly opposed to the previous proposal.

We do not believe that the reduction in built form brought by reducing the building height from 5 to 3 storeys has any community or heritage value, and we believe it is likely to create broader environmental and economic harms for the Canberra community. We note that residents outside of Yarralumla were not consulted on the reduction in height from 5 storeys to 3, and strongly encourage the NCA to reconsider this restriction for several reasons:

- While part of the stated rationale for reducing the built height is to ensure consistency with the Yarralumla Brickworks development, we note that this site has a significantly different placement from that neighbouring project. The proposed set-backs to residential areas and the space provided by the central oval meaning that increased height will have negligible visual impact.
- Buildings of between 5 and 9 storeys have been widely accepted by the community as appropriate scale for ‘brownfield’ infill developments, as has been seen in recent projects in Kingston and Campbell.
- Increasing building heights would allow for the same or an increased number of units to be built while reducing the built footprint, thus enabling more green space to be preserved as natural environment or for public use.
- Reducing building height for inner-city developments such as these will result in reduced housing supply in Yarralumla and increased sprawl on Canberra’s suburban fringe, which has negative consequences both for housing affordability and for Canberra’s environmental and climate goals.

Setback requirements

The draft amendment proposes an 80m setback requirement on the northern side of the block. While the setback on the southern side of the site is seemingly informed by the protected Golden Sun Moth grassland, this 80m northern setback requirement does not seem to be informed by similar environmental protection goals. This requirement has several negative consequences for the design of the site:

- The proposed aged care precinct is pushed back into the site, reducing the amount of space behind the precinct that can be set aside for environmental conservation or protected garden space.
- Residents and visitors of the aged care precinct will have to walk further to reach the facility.
- Additional landscaping and driveway construction is required between Banks Street and the precinct.

In light of this, we encourage the NCA to reconsider this set-back requirement, with the aim of better connecting the development with Banks Street and Will Crane Crescent.

Street activation, parking requirements, and active transport linkages

Given the inner-city location of the site, we believe any future development should be well-integrated with nearby pedestrian and cycle networks, and support reduced car use. As such, we encourage the NCA to strengthen language around pedestrian linkages in the draft amendment and work with the ACT Government to ensure development is accompanied by:

- Construction of high-quality shared footpaths/cycle paths along Banks Street and Bentham Street, and between the proposed development and the nearby C4 bike path via Schlich Street.
- Construction of high-quality raised pedestrian and cyclist crossings along Will Crane Crescent and Banks Street, to enable easy access into Yarralumla for residents (including residents of aged care facilities).
- Reduced road speeds in the vicinity of the development, along with limits to on-street parking in areas of high-foot traffic to improve pedestrian visibility.

With this in mind, we further encourage the NCA to consider altering the current draft amendment to push car traffic away from Will Crane Crescent, especially in the vicinity of the proposed hotel and heritage forestry school building. As it stands, this space will likely be dominated by car traffic, limiting easy pedestrian flow between the hotel and residential developments, the oval, and Yarralumla proper. An alternative approach would be to create a new verge crossing and driveway to link the development to Bentham Street, with car traffic to be largely redirected to this side of the site.

We further note that the current draft amendment requires future development to be consistent with ACT Government planning requirements with regard to minimum parking spaces. Greater Canberra has previously advocated for these requirements to be reduced, in recognition of the fact that they generally do not allow for the construction of homes that suit the needs of the 2 in 5 Canberra households with 1 or no cars. The result is that families with fewer cars are forced to pay for parking they do not need. In light of this, and given the large amount of on-street parking available in the surrounding area, we strongly encourage the NCA to remove parking requirements from this development, in order to allow the proponent to build parking in accordance with actual market demand. Failing this, the NCA could consider requiring 1 parking space per unit, with any parking spaces required to be sold separately from residential units.

		<p>About Greater Canberra</p> <p>Greater Canberra is a grassroots community organisation advocating for a more sustainable, liveable, and affordable Canberra. We believe that by reforming planning laws, embracing people-centred urban design, and creating a more compact and better-connected city, Canberra can reduce our carbon emissions, and become a more equitable, prosperous, and pleasant city for all.</p>
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Attachment D: Detailed response to traffic issues raised in submissions

16 January 2024

Enquiries: John Kiriakidis
Project No: 301400218

Oakstand
Level 9, 505-505 Kent Street
SYDNEY NSW 2000

Attention: Justin Micallef (Project Director)

Dear Justin

**RE: 1 Forestry Place, Yarralumla (Former CSIRO Site)
National Capital Plan Draft Amendment 97 – Block 7 Section 4 Yarralumla
Transport Impact Assessment – Response to YRA Submissions**

We have now had a chance to review the stakeholder and public submissions seeking further information on a range of transport engineering elements associated with the masterplan proposal for a site referred to as Forestry Place, located at Block 7, Section 4, Yarralumla.

Correspondence received includes the following:

- Environment, Planning and Sustainable Development, letter reference 23/117650, dated 19 December 2023, containing comments from Transport Canberra and City Services Directorate (TCCS)
- Yarralumla Residents Association (YRA) submission, letter dated 12 December 2023
- Individual Public Submission from John Konstantinou, emails to NCA dated 19 and 20 December 2023.

On reviewing the correspondence, we offer the following responses for further consideration. The issues raised have been reproduced in *italics*, with Stantec's response provided thereafter.

This letter should be read in conjunction with the report "Forestry Place, Yarralumla, Transport Impact Assessment" (Transport Assessment) prepared by Stantec dated 8 November 2023.

1. TCCS Comments

1. TCCS notes that the masterplan is designed to allow high-quality pedestrian / bicycle paths and connection to the Brickworks, by facilitating a new shared path on the western side of Banks Street between Bentham Street and Brown Street, and the western side of Wilf Crane Crescent. TCCS is supportive of these connections being carried forward as part of an overall active travel network that links the development with the surrounding neighbourhood and that the connections be further developed as off-site works when the proposed amendment progresses to any development applications.

TCCS support for the proposed active travel connections is noted. These will be further developed as off-site works when the proposed amendment progresses to any development applications.

2. The proposed development is expected to have a moderate and manageable impact onto the surrounding road network.

TCCS evaluation of the proposed developments impact on the surrounding road network is noted.

3. In terms of car parking, TCCS notes the intentions to deliver on-site parking that aligns with our equivalent Territory Plan requirements including a mix of surface-level and subterranean level car parking for residents, visitors and employees. It is understood that the final car parking numbers are anticipated to be determined at the works approval stage of any future development. TCCS requests further engagement with the NCA in addressing this aspect of the project and TCCS may seek further details during the works approval stage to ensure that the specifics of the parking arrangements are also compatible with any existing parking in the public domain.

TCCS support for the proposed car parking strategy is noted. Further engagement with NCA and TCCS will be completed during works approval stage to ensure that the specifics of the parking arrangements are compatible with any existing parking in the public domain.

Design with **community** in mind

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2. YRA Comments

2.1 Executive Summary

1. The scale and impact of the traffic generation from the Forestry Place Development (former Australian Forestry School) on Yarralumla has been substantially underestimated. The poor network connectivity of the Site to Yarralumla and the traffic movement characteristics and patterns of the suburb have not been understood and applied in the Transport Impact Assessment (Traffic Assessment). The inability of the adjacent roads of Bentham Street at the Yarralumla Shops and Weston Street (W), to carry the increased traffic due to local constraints has not been recognised.

Responses to relevant issues raised are addressed in the following sections. In summary:

- The Transport Impact Assessment (TIA) has been prepared in support of the current masterplan. The NCP Amendment allows for some flexibility in the mix and scale of future land uses. Each subsequent Works Approval Application will further address the transport impact of the proposed application and the Forestry Place development cumulatively.
- Yarralumla has a permeable and connected road network providing a range of opportunities for vehicles traveling to and from various origins/ destinations, including Alexandrina Drive, Novar Street/ Kent Street, Hopetoun Circuit and Empire Circuit. Of note, the site/ Banks Street connects through to Novar Street via a series of east-west roads including Schlich Street, Hooker Street, Bentham Street, Weston Street and Denman Street/ Kintore Crescent.
- Residents, staff and visitors will travel to and from the site via the route with the shortest travel time and any local network constraints will, in our experience, result a local redistribution of traffic to the next most appropriate route. The increase in traffic along Bentham Street as detailed in the Transport Assessment represents one possible scenario when in practice, the range of routes available for vehicles to distribute through to Novar Street (traveling north, east and south) would ensure Bentham Street continues to maintain a level of traffic consistent with its functional role and accounting for opportunity elsewhere on the network for movement and mobility where the neighbourhood activity centre is neither an origin or destination.

2. The Traffic Assessment has not provided a sound basis and is fundamentally flawed because the parameters and assumptions of the modelling do not align with the local characteristics, street hierarchy and traffic flows of Yarralumla.

Also the Draft Amendment 97 provides for a 13% greater scale of Dwellings that is 300 compared to the Proponent's Forestry Place Masterplan of 266 Dwellings on which traffic impacts have been assessed.

These traffic impacts should be addressed through:

- *a reduction in the scale of the Development by lowering the maximum number of dwellings to 230 this number to include any social housing and aged care independent living units for seniors, AND*
- *setting conditions on the number of traffic movements to be generated through Commercial, Community Facility and Office use, OR*
- *the provision of a new dedicated access road to the Australian Forestry School Site, as has been done with the adjoining Canberra Brickworks Precinct which is of similar scale.*

The Transport Impact Assessment has been prepared in support of the current masterplan. The NCP Amendment allows flexibility in the scale and nature of future land uses and planning controls. The final development scheme including the scale and type of uses will be finalised by future Works Approval Applications. Each subsequent Works Approval Application will address the transport impact of the proposed application and the Forestry Place development cumulatively. The community will have the opportunity to comment upon any future Works Approvals when exhibited.

The suggestion for setting conditions on the number of traffic movements to be generated by various land uses is not practical nor enforceable.

The provision of a new access road for the Brickworks Precinct is not comparable to the Forestry Place site, given proximity of the Brickworks site to the arterial road network. It is not reasonable, necessary or practical to provide a dedicated access road to the development. Such an outcome is likely to result in other unintended consequences which have not been explored or considered by the submitter.

4. The ACT Government Public Playing Field "Forestry Oval" (Block 4 Section 4 Yarralumla) parking area is currently accessed via the private road Wilf Crane Crescent. There are no provisions for future public access to this parking area along a private road.

It is intended to dedicate Wilf Crane Crescent to the Territory Government during the course of the redevelopment and in this process, any potential narrowing of Wilf Crane Crescent at the northern end near the former Forestry School as discussed in response to YRA Executive Summary comment 6, is proposed to be addressed and subject to a future works approval.

Forestry Oval provides an informal car park (grass/ dirt ground with no demarcation of parking spaces) at its north-western extent, with access provided via a crossover to Wilf Crane Crescent. The informal car park is located on ACT Government land, however access is provided via a crossover to Wilf Crane Crescent, which is a private roadway.

Wilf Crane Crescent also currently provides parallel parking along its southern edge, as well as six formal (paved and line marked) indented ninety degree parking spaces along its western edge, and additional indented informal parking (dirt ground with no delineation of parking spaces) at its northern extent.

The proposed masterplan will not modify the existing informal car park and access arrangements. The masterplan also provides for parallel indented parking bays along the southern edge of Wilf Crane Crescent and will retain the six formal indented ninety-degree spaces, and additional informal indented parking along its western and northern edges.

Transferral of Wilf Crane Crescent to the Territory Government will ensure continued public access to the informal car park, as well as for public use of parking along Wilf Crane Crescent consistent with the existing condition.

On this evaluation, parking arrangements for the Forestry Oval post development of the masterplan will be consistent with the existing condition.

5. Also the Forestry School Building is at risk from the increased volume of traffic owing to the Wilf crane Crescent being only 4m wide at this point.

The minimum road width for one-way flow is 3.0 metres for cars/vans in accordance with AS2890.1:2004, or 3.5 metres for trucks in accordance with AS2890.2:2018. Given road width of 4.0metres, around 0.5 metres is currently in excess of minimum statutory requirement.

We do expect that detailed planning will involve the additional of line marking and/ or landscaping to ensure an appropriate level of operational performance at this location. We expect these controls will be incorporated as part of further detailed design completed in future Works Approval Applications.

2.2 Key Issues and Explanation

4. The Australian Forestry School Site (10.9 ha) is adjacent to the Canberra Brickworks Precinct Development (16 ha) and the scale of these two developments is equivalent (in terms of dwelling numbers, Commercial and Office space and re-purposing heritage buildings). To address the traffic impacts of the Canberra Brickworks Precinct development on Yarralumla, all residential and commercial traffic is connected to the main road network by a new purpose-built dedicated Access Road (Brickworks Road) that connects to a non-residential street. This was done specifically to preclude high volumes of traffic accessing the precinct via the existing narrow residential streets of Yarralumla.

The Australian Forestry School Site on the western periphery of Yarralumla is landlocked by the Royal Canberra Golf Course, the Canberra Brickworks Precinct and Westridge House. Because of this, the Site has poor connectivity through the suburb and to the arterial road network which will be required to carry all the traffic generated by the development. The configuration of the roads adjoining the Site means that they do not have the ability to carry the traffic that will be generated by the development.

Yarralumla has a permeable road network providing a range of opportunities for vehicles traveling to and from various origins/ destinations, including Alexandrina Drive, Novar Street/ Kent Street, Hopetoun Circuit and Empire Circuit. These connect directly through the site from a variety of east-west connectors to Banks Street including:

- Schlich Street
- Hooker Street
- Bentham Street
- Weston Street
- Denman Street/ Kintore Crescent

On this evaluation, the site has good connectivity supported by the permeable road network throughout the suburb and abundance of routes available to residents/ staff and visitors.

The provision of a new access road for the Brickworks Precinct is also not comparable to the Forestry Place site, given proximity of the Brickworks site to the arterial road network. It is not reasonable, necessary or practical to provide a dedicated access road to the development. Such an outcome is likely to result in other unintended consequences which have not been explored or considered by the submitter.

Further discussion relating to the performance of the local road network is contained in response to YRA Key Issues and Explanations comment 6, located below.

5. The Traffic Assessment does not provide a sound basis from which to assess the scale and impact of the traffic that will be generated from the Forestry Place Development. The application of the intersection counts and traffic assessment modelling to Yarralumla is fundamentally flawed in the Transport Impact Assessment of the Forestry Place Development. The parameters and assumptions of the modelling do not align with the local characteristics, street hierarchy and traffic flows of Yarralumla. For example, Yarralumla has high out-of-suburb traffic levels for childcare centres, the primary school (80% non-resident), churches and the Royal Canberra Golf Club. Weekend traffic in Yarralumla is 17%-56% higher than weekday traffic (Banks Street 2015-16), especially in summer, as Yarralumla is the access point for users of Weston Park and Lake Burley Griffin and their attractions. For example, the 2nd December 2023 Rowing Regatta had 753 competitors, plus support crews, family and spectators, many from interstate. This results in a high level of Yarralumla traffic being visitors not residents.

The analysis has resulted in a substantial underestimate of increased traffic volume generated by the Forestry Place Development of around 36% to 50%, and of the impacts of the increased traffic on Yarralumla, its infrastructure, and the interconnectivity of the road network.

As noted in response to YRA Executive Summary comment 2, located in Section 2.1 above, the Transport Assessment has been prepared in support of the current master plan. The NCP Amendment allows flexibility in the scale and nature of future land uses and planning controls. The final development scheme will be finalised by future Works Approval Applications. Each subsequent Works Approval Application will address the transport impact of the proposed application and the Forestry Place development cumulatively. The community will have the opportunity to comment upon any future Works Approvals when exhibited. With this in mind, the traffic generating characteristics of the development are therefore based on the masterplan and are detailed in the Transport Report. TCCS have endorsed the Transport Assessment and hence the traffic generation adopted for the assessment has been considered suitable.

As per Section 2.3.1 of the Transport Assessment, the traffic assessment along Banks Street has been prepared based on volumes collected in summer, being 3 and 5 December 2020, on both a weekday and weekend. A discussion around the suitability of these volumes is captured in response to YRA page 22/24 comments, located in Section 2.3 below. As noted, traffic counts and associated modelling are based upon design day rather than peak-of-peak conditions, noting the analysis has been based on traffic counts undertaken on two occasions to TCCS's satisfaction. While special events or brief periods result in an uplift in traffic volumes on select weekends during the summer / shoulder periods, traffic modelling and the road network are not usually designed to accommodate such infrequent events. As also noted, all local intersections operate with a Level of Service A, and sensitivity analysis comprising an uplift of background traffic growth indicates they continue to operate with a Level of Service A.

As discussed further in response to YRA page 26 comment, located in Section 2.3 below, the assessment acknowledges the high rate of visitors from origins external to Yarralumla. With this in mind, the assessment conservatively assumes all staff/ visitors are generated from locations external to Yarralumla. The assessment also conservatively allows for only 15 to 20 per cent of residents to complete trips internal to the suburb, noting this is less than current trends for the area as demonstrated in the Household Travel Survey that shows 62 per cent of trips completed by South Canberra residents occur within the South Canberra area.

6. Local traffic issues in relation to the existing traffic and parking conditions surrounding the site have not been identified and considered, nor has the impact of the development proposal on the surrounding road network. The Traffic Assessment has 60% of the Forestry Place Development traffic (2,300 VPD to 3,300+VPD) travelling via Banks Street then Bentham Street, and a further 30% via Banks Street then Weston Street (W). This traffic flow is not viable as Bentham Street at the Yarralumla Shops is already unusable as a throughfare and cannot cope with an additional 1,400 VPD

- *This section of Bentham Street at the Yarralumla Shops does not meet the AS 2890.5. It is very narrow and has on-street 90o angle parking on both sides with 46 bays. This on-street parking is constantly over capacity.*

- *This area is dangerous as vehicles parking or reversing to leave must cross onto both sides of the street and this precludes use by any through traffic. It results in roadblocks, traffic jams and multiple daily minor accidents, including by former Prime Minister Scott Morrison in 2021 (see Appendix).*
- *In addition, the Traffic Assessment suggests that for improved public transport the Bus Route 57 be re-routed to travel via the Forestry Place Development and through Bentham Street at the Yarralumla Shops. This is not a safe or viable option. This would further increase congestion and accidents.*

Bentham Street is not a viable option for Forestry Place Development traffic. Thus 90% of the traffic flow generated, that is an additional 2,000 VPD plus, would be forced along Weston Street (W) resulting in the failure of the Novar Street-Weston Street intersection which already has a high accident rate.

The impact of a development of this scale on the surrounding street hierarchy and its integration with the existing network has been substantially underestimated and major local issues are not recognised and hence not addressed.

Traffic has many routes available to them, including:

- Schlich Street
- Hooker Street
- Bentham Street
- Weston Street
- Denman Street/ Kintore Crescent.

Majority of users at the site will be familiar with the local road network and any pockets of traffic congestion, including around Bentham Street shops. As such, residents, staff and visitors will, in our experience, travel to and from the site using the route with the shortest travel time and any local network constraints will influence driver route choice. The traffic assessment to date has considered an increase in loading along Bentham Street to ensure a conservative assessment. Notwithstanding this, Stantec have completed sensitivity analysis of the following two scenarios:

1. assuming no vehicles use Bentham Street (aside from those traveling to/ from the shops) and 100 per cent of vehicles travel via Weston Street to access Novar Street
2. scenario 1, with a further uplift in background traffic volumes, as per the sensitivity analysis discussed in response to response to YRA Key Issues and Explanation comment 5 above.

Even in both of these circumstances, the Weston Street/ Novar Street intersection operates with a Level of Service B or better for all movements. As such, the increase in traffic along Bentham Street as detailed in the Transport Assessment represents one scenario and in reality, the range of routes available for vehicles to distribute through to Novar Street (traveling north, east and south) would ensure Bentham Street continues to maintain a level of performance consistent with the existing condition.

The vehicles per day (VPD) estimates that YRA has sourced likely from Table 7.13 are incorrect. It is expected that the YRA have summed both data points along Bentham Street and taken this as the total VPD generated. However, the table is set up to show the number of vehicles expected at a midblock location. As such, any vehicles expected along Bentham Street just east of Banks Street are the same vehicles expected on Bentham Street just west of Novar Street. Around 100 vehicles disappear between the two points due to the expectation that some residents/ staff/ visitors will stop at the Yarralumla Shops per day. These 100 vehicles include inbound and outbound vehicular movements, hence represent only 50 individual cars per day. As already noted however, these VPD estimates represents one scenario and in reality, vehicles would be spread across multiple other feeder routes through to Novar Street and beyond consistent with broader network performance characteristics.

While it is acknowledged there has been a series of property damage incidents along Bentham Street at the Yarralumla Shops, we note the Beetoota Advocate is not a reliable source including as it relates to Scott Morrison given it is a satirical newspaper that often embellishes stories for the purposes of entertainment and engagement. Section 2.10 of the Transport Assessment sets out an analysis of crash data as supplied by TCCS for the five-year period between 2015 and 2019 and acknowledges around 44 collisions occurred along Bentham Street. A further review of the crash data confirms that all collisions related to vehicles manoeuvring during parking, including nine collisions relating to vehicles leaving a parking space and 35 relating to collisions between parked vehicles. All collisions resulted in property damage only, with no injuries reported. It is understood that TCCS are aware of community concerns around parking at the Yarralumla Shops and will be addressing separately.

In regards to the YRA comments on public transport opportunities, the Transport Assessment merely notes that the development may be a catalyst for the re-alignment of existing bus route 57 and provides an example of how the route could be deviated. The route deviation is not strictly recommended, nor required to support the development. This is

naturally a matter for TCCS to review at their discretion and we expect any such review would occur as part of comprehensive bus route planning associated with Light Rail stage 2.

7. Yarralumla is essentially inaccessible from three sides and there is a high level of Yarralumla traffic being visitor and not residents to Lake Burley Griffin and associated attractions, especially on weekends. The Australian Forestry School Development (Forestry Place) and the adjacent Canberra Brickworks Precinct Development are on the far western side of Yarralumla, are both essentially "land locked" by Dunrossil Drive/Government House, Royal Canberra Golf Course, Westridge House and Lake Burley Griffin. For the Canberra Brickworks Precinct the nature and scale of the traffic issues were recognised and addressed through the provision of a new dedicated access road via a non-residential street and connected to a main arterial road.

8. The need for new access to the western side of Yarralumla to take externally generated traffic down to the lake and relieve congestion in the suburb was recognised in 1979 (Parliamentary Report of the Joint Committee on the Australian Capital Territory Report 10 May 1979). This was followed by the 1980 Policy Plan for Yarralumla which gazetted the "West Yarralumla Tourist Road" that ran from the Dudley Street Cotter Road intersection along the back of the Canberra Brickworks Precinct and the Australian Forestry School Site and then down to Weston Park. This proposed road is no longer gazetted.

We appreciate there may have been a gazetted West Yarralumla Tourist Road in 1980 to mitigate the impacts of tourists and/or commuters circumnavigating Yarralumla to find a quicker route to/ from the city, however given this has been removed from infrastructure plans, it is no longer has any planning status, even as an unfunded project.

The provision of a new access road for the Brickworks Precinct is not comparable to the Forestry Place site, given proximity of the Brickworks site to the arterial road network. The YRA desire for a West Yarralumla Tourist Road to mitigate the impact of tourist and/or commuters using Yarralumla as a "rat-run" is a matter for the Territory Government to consider further and evaluate as part of strategic planning in ACT generally.

9. The traffic impacts of the proposed Australian Forestry School Site Development should be addressed through:

- *a reduction in the scale of the Development by lowering the maximum number of dwellings to 230 including any social housing and aged care independent living units for seniors, AND*
- *setting conditions on the number of traffic movements to be generated through Commercial, Community Facility and Office use, OR*
- *the provision of a new dedicated access road to the Australian Forestry School Site, as with the adjoining Canberra Brickworks Precinct which is of similar scale.*

Refer to response to YRA Executive Summary comment 2, located in Section 2.1 above.

11. The ACT Government Public Playing Field "Forestry Oval" (Block 4 Section 4 Yarralumla) parking area is currently accessed via the private road Wilf Crane Crescent. There are no provisions for future public access to this parking area along a private road.

Refer to response to YRA Executive Summary comment 4, located in Section 2.1 above.

13. The former Australian Forestry School Heritage Building is at high risk of traffic damage and provisions for its protection are required in the Draft Amendment 97. The Wilf Crane Crescent is only 4m wide where it directly abuts the Australian Forestry School and the increased traffic poses a high risk to the structure from vibration and impact. The boundary with the ACT Government's Public Playing Field (Block 4 Section 4 Yarralumla) precludes road widening unless a section of land from Block 4 Section 4 is acquired from the ACT Government.

Refer to response to YRA Executive Summary comment 5, located in Section 2.1 above. As detailed, the four metres road width exceeds the minimum requirements as set out in the Australian Standards, and hence additional controls to protect the structure could be implemented without the need for road widening.

2.3 Detailed Analysis of Issues and Impacts

This section has sought to address any comments provided in the detailed analysis of issues and impacts not explicitly contained in the comments above.

Page 10: The Traffic Assessment analysis applies current traffic levels based on traffic and intersection counts taken in 2020 and 2023 and they are acknowledged to be depressed numbers. They do not include operation at the site by CSIRO, and are also low due to COVID 19 impacts and the lag in adjusting back from work from home patterns.

Section 2.3.1 of the Transport Assessment discusses the impact of COVID 19 on traffic volumes. As it relates to counts completed in December 2020, it is noted “*given global events related to COVID-19, traffic conditions during early to mid-2020 were not typical of traditional circumstances and not considered representative of peak repeatable conditions. Consultation with TCCS in October 2020 indicated that generally traffic was back to 95 per cent of pre-COVID levels, with volumes along Cotter Road down 3.1 per cent compared to early March 2020 (pre-COVID). Further review of SCATS traffic count data along Cotter Road in November 2020 indicates additional growth in peak period traffic demand, with traffic conditions during the survey period considered representative of typical activity periods prior to the influence of COVID.*”

Updated counts were completed in 2023 in order to capture the impact of the road network upgrades to traffic patterns around the Kent Street/ Adelaide Avenue interchange. While some depreciation in traffic was observed and as discussed in Section 2.3.2 of the Transport Assessment, this was observed against the December 2020 traffic volumes. Any residual effects of COVID to traffic patterns in 2023, including due to work from home arrangements, are considered the “*new normal*” and counts are entirely suitable for use in the base case. This approach has been independently validated by TCCS who has endorsed the Transport Assessment and use of such data.

With regard to the comment around previous operation of CSIRO, refer to the response below.

Page 10. The increase in Banks Street Traffic from the Forestry Place Development from the levels when the CSIRO Facility was operating at the site prior to 2019 was not assessed. This can however be estimated from 2016 Banks Street traffic counts as generating 686 VPD with other Banks Street Traffic at 88 VPD.

Use of historical daily traffic volume data along Banks Street to isolate the traffic generating characteristics of the CSIRO is not a suitable as the composition of traffic cannot be verified. The YRA estimate that the CSIRO generated 598 vehicle trips per day (686 VPD minus 66 VPD). Should this be the case, this suggests that full development of the existing Forestry Place lease agreement which permits up to 17,400sqm (GFA) of scientific research floor space, with 9,800sqm of that permissible gross floor area provided to date, would generate more traffic than assumed in the Transport Assessment to date. As a consequence, the “*net uplift*” in traffic generated by the masterplan and the full development of the already permitted CSIRO facility would reduce indicating the masterplan has less impact on the road network than assessed to date. With this in mind, the Transport Assessment is considered to be suitably conservative.

Page 10: The Stantec estimates of traffic generated by the Forestry Place proposal is 2,324 VPD. If an estimate is made of that permitted for mixed-use under the broader Draft Amendment 97 the traffic generated would be 3,288 VPD an increase of 41%.

Refer to response to YRA Key Issues and Explanation comment 5, located in Section 2.2 above.

Page 21. The Stantec Traffic Assessment does not recognise the limitations presented by the network of streets in Yarralumla given the volume of traffic carried and the width of the carriageway. Most roads are Access B with and a number are carrying arterial road level traffic. Of particular note are Weston Street (W) and Bentham Street (Shopping Centre) which have carriageway widths of only 7.4m which will be required to carry the increase in Forestry Place traffic. In addition this section of Bentham Street is not a thoroughfare but essentially a dangerous on-road 90o parking lot which is half the width required by the Australian Standard. Also the recently upgraded Dudley Street only increased the carriageway width by 1m, this road already carries arterial road numbers of traffic prior to the Canberra Brickworks Precinct Development being built.

With regards to the allocation of roads against the hierarchy and road network layout requirements set out in the Estate Development Code, refer to response to Public Submissions, Correspondence received 19 December comment 1, in Section 4.2 below. In regard to the operation of the local road network, refer to response to YRA Key Issues and Explanation comment 6, in Section 2.2 above.

Page 22. The analysis does not recognise that the Canberra Brickworks Precinct does not connect directly to the existing suburb by road through existing residential streets but via a new Access Road.

The traffic model reflects the proposed access arrangements and forecast traffic generation as a result of the completed Canberra Brickworks Development, as accepted and agreed with TCCS. This is demonstrated in the Turning Movement Diagrams contained in Appendix A of the Transport Assessment, that clearly show majority of access via the new Dudley Street roundabout, with some minor access to residential developments via Denman Street and Bentham Street.

Page 22: The Stantec traffic Intersection counts were taken on Thursday 3 December 7am-10am and 4 to 7pm and Saturday 10.30am-1.30pm. The Stantec report cites the Cotter arterial road as the indicator that the 2020 figures are representative of normal levels, but this does not hold for the local roads in Yarralumla. This was the start of summer during COVID-19 (pre-vaccine availability) when traffic for outdoor activity at the Lake was highly depressed, as was that to the 23 visitor attractions in Yarralumla. Traffic was not at pre Covid Levels. This is clearly shown by Banks Street traffic counts. The 2020 weekday traffic counts are 29% lower than in 2015 and on weekends 42% lower. The weekend traffic counts in 2015 were 36% higher than on weekdays, whereas weekends were only 22% higher than weekdays in 2020. As such the 2020 traffic figures do not reflect usual usage.

Page 24. The Traffic Assessment uses 2020 figures for the baseline; however, these figures are quite depressed from normal levels. This is clearly demonstrated by comparison of 2015 traffic counts at Novar Street and Kintore by AECOM 4/11/2015 with Stantec for the same area in on 3/12/2020 and 8/12/2020.

Traffic counts corner Novar Street/Kintore		
	AM PEAK	PM PEAK
AECOM 4/11/2015	897	777
STANTEC 3 & 8 /12/2020	549	483
Reduction Actual	-348	-294
Reduction %	39	38

As discussed at Section 2.3.2 of the Transport Assessment, the intersection of Novar Street/ Dudley Street/ Adelaide Avenue has been re-surveyed in 2023 to capture the revised traffic patterns resulting from the signalisation of the interchange. As such, the traffic volumes contained in Appendix A of the Transport Assessment and referenced above actually represent the 2023 traffic volumes. When reviewing the 2020 data for this intersection, peak volumes along Novar Street north near Kintore Crescent were 728 and 773 vehicles per hour respectively in the weekday AM and PM peak hours. This is equivalent in the PM peak period.

A further review of traffic volumes collected by AECOM on Wednesday, 21 June 2017 indicate volumes of up to 719 vehicles per hour in the AM peak hour, equivalent to the traffic volumes collected in the 2020 traffic data set. As such, the weekday 2020 traffic data set collected for Yarralumla is considered appropriate. Further additional discussion around the use of 2020 data is provided in response to YRA page 10 comments, located in Section 2.3 above.

As noted by YRA, the CSIRO was operational prior to 2019. As such, 2015 and 2020 traffic volumes along Banks Street during the weekday are naturally not comparable as volumes would have been inflated by commercial staff traveling to/ from site. In terms of weekends, the 2020 weekend traffic volumes along Banks Street are 140 to 173 per cent higher than the weekday volumes. Clearly increased activity from weekend activities, whether that's by locals or those external to Yarralumla, has been captured in these counts. Further, traffic counts and modelling are based upon typical conditions, noting the analysis has been based on traffic counts undertaken on two occasions to TCCS's satisfaction.

Regardless of the traffic volumes used, and as discussed in response to YRA Key Issues and Explanation comment 5, located in Section 2.2 above, ultimately intersections within the local Yarralumla road network have sufficient spare capacity to accommodate the uplift in traffic volumes generated by the development. Sensitivity analysis has been completed assuming an uplift in local intersection base volumes and indicates all intersections continue to operate well and with spare capacity. A discussion around the friction that results from parking along Bentham Street and impact to traffic is discussed in response to YRA Key Issues and Explanation comment 5, located in Section 2.2 above.

Page 22: Reported Crash data for the area for 2015 to 2019 is 227 collisions over 5 year period. Collisions at the Novar Street-Dudley Street intersection were relatively low at 29 reported crashes (13%), whereas the highest number of reported collisions was 45 (20%) at the Yarralumla Shops Bentham Street (between Banks Street and Mueller Street),

but the modelling had the intersection performance at "Good Operation" LOS A (Level of Service A). This was not investigated further. This highlights that the rating of the intersection performance from the modelling is of limited use in identifying impacts and issues in Yarralumla.

SIDRA INTERSECTION is a modelling software package which calculates intersection performance and is a critical tool used to evaluate the transport impact of a development to the surrounding road network. The commonly used measure of intersection performance is vehicle delay. SIDRA INTERSECTION determines the average delay that vehicles encounter on approach to an intersection and provides a measure of the level of service. It is noted that average delay is calculated based on the delay experienced by all vehicles that travel through that intersection. At unsignalised intersections, including at the Novar Street/ Bentham Street intersection, the results report on the movement that has the worst average delay. While friction from parking along Bentham Street west of Novar Street can result in minor delays and/ or queueing to vehicles traveling through on Bentham Street, ultimately on average, vehicles using the adjacent intersections continue to experience acceptable delays during the peak periods assessed, as represented by the Level of Service A.

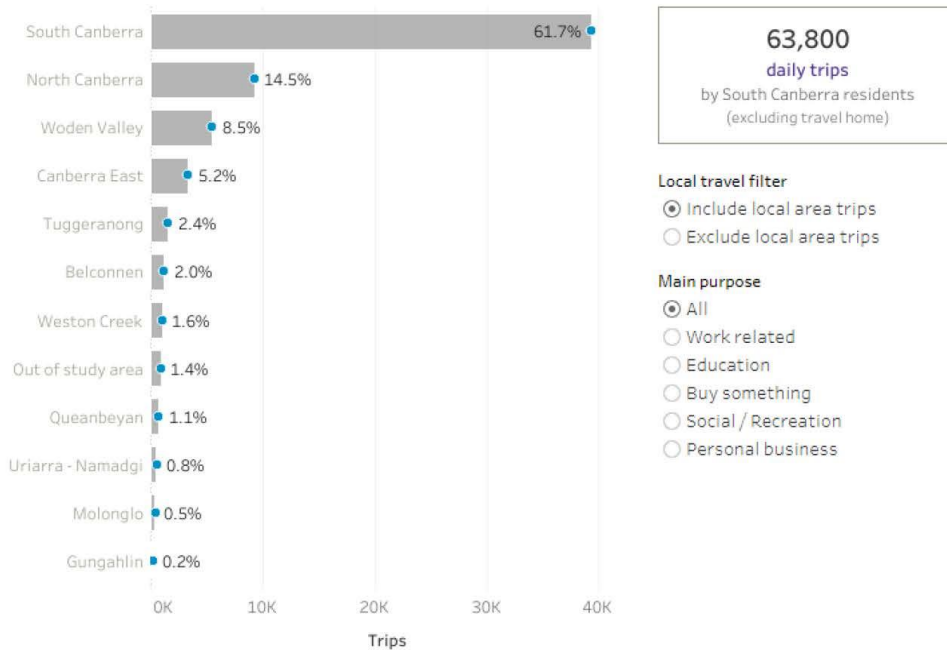
Page 26: Stantec Traffic Assessment then further discounts trip generation by 20% for trips internal to Yarralumla. For Yarralumla this discount should not apply as a very significant proportion of trips, are not Yarralumla Residents but from outside the suburb.

It is noted that the "trip discount" refers to trips considered as internal trips, being trips that would not exit the Yarralumla Suburb. As such, these internal trips should not be considered a reduction to total trips, merely a reduction to trips that travel to locations outside of the Yarralumla Suburb. The internal trips have been considered in the trip distribution diagrams as contained in Appendix A of the Transport Assessment and have therefore been captured in traffic modelling results.

As detailed in Table 7.4 of the Transport Assessment, such internal trip factors ("discounts") have only been applied to the residential use during weekdays (15% discount applied) and residential and hotel guest uses on weekends (20% discount applied for each use). No internal trip factors (or "discount") has been applied to aged care or commercial office use during weekends or weekdays, nor hotel use during weekdays as its expected clientele would comprise a greater proportion of professionals rather than tourists.

As discussed in Section 7.4 of the Transport Assessment, to ascertain the likely number of internal trips to Yarralumla, guidance has been sought from household travel surveys completed by the ACT government in 2017. The surveys indicate that between 35 per cent and 75 per cent of all trip types can be serviced locally within the South Canberra district area. Given the data was based on the 2017 household travel survey, comparable data has been extracted from the most recent household travel survey completed in 2022, reproduced in Figure 2.1. As shown, 62 per cent of daily trips made by Canberra residents can be serviced locally within the South Canberra district area, consistent with 2017 results.

Figure 2.1 – Locations of trips made by South Canberra residents



Source: ACT and Queanbeyan-Palerang Household Travel Survey 2022, Where, <https://www.transport.act.gov.au/planning-for-the-future/household-travel-survey>, accessed 9 January 2024

Given that the surveys cover the broader district area of South Canberra which includes suburb areas over Adelaide Avenue, some judgment is required to the extent that trips generated by the project may remain within the Yarralumla suburb area. These proportions are likely to be influenced by both the nature of the uses proposed as part of the development as well as the level of services and facilities available within the Yarralumla suburb itself. Notional (and conservatively low) estimates for internal trips (“trip discounts”) have therefore been adopted between 15 to 20 per cent of total trips for each relevant use. Following from the above, these internal trip factors (or “discounts”) are considered appropriate to be adopted as part of the assessment.

Page 26: The Mint Interchange is put forward by Stantec as an upgrade that would improve accessibility and ease congestion around Yarralumla by 2031 and 2041 - this is totally misleading. The ACT Government has not included the Mint Interchange in any transport plans, there is no funding for it, and the main function of the Mint Interchange was to get better access to the West Deakin not Yarralumla. The proposal for a Mint Interchange was developed by the Land Development Agency as part of a much larger Canberra Brickworks Precinct development of 1880 dwellings, not the current 380. There is no plan to proceed with the Mint Interchange and it is misleading to reference it.

As discussed at Section 7.1.2 of the Transport Assessment, the mint interchange was contained in the version of Canberra Strategic Transport Model (CSTM) provided by request to Transport Canberra and City Service (TCCS) for the future year 2031 and 2041. Outcomes from the model as discussed in the Transport Assessment indicate that the mint interchange would benefit Yarralumla through the removal of traffic demand at the Novar Street/ Kent Street/ Adelaide Avenue interchange as demonstrated at Figure 7.1. Notwithstanding, in Section 3.3.1 of the Transport Assessment, it is noted “Whilst this upgrade has the potential to improve accessibility and ease congestion in and around the Yarralumla area, traffic analysis later in the report excludes allowance for its construction”.

Finally, TCCS has acknowledged the inclusion of the project within the ACT strategic transport model. We understand that TCCS as part of the current transport planning review in associated with the planned light rail stage 2 extension are reviewing the necessity for this connection which would provide improved connectivity to the Molonglo Valley growth area.

3. TCCS Comments

The following has been extracted from correspondence between Ben Ponton (ACT Government) and Andrew Smith (NCA) dated 19 December 2023.

3.1 Correspondence received 19 December

1. *TCCS notes that the masterplan is designed to allow high-quality pedestrian / bicycle paths and connection to the Brickworks, by facilitating a new shared path on the western side of Banks Street between Bentham Street and Brown Street, and the western side of Wilf Crane Crescent. TCCS is supportive of these connections being carried forward as part of an overall active travel network that links the development with the surrounding neighbourhood and that the connections be further developed as off-site works when the proposed amendment progresses to any development applications.*

This comment is noted

2. *The proposed development is expected to have a moderate and manageable impact onto the surrounding road network*

This comment is noted

3. *In terms of car parking, TCCS notes the intentions to deliver on-site parking that aligns with our equivalent Territory Plan requirements including a mix of surface-level and subterranean-level car parking for residents, visitors, and employees. It is understood that the final car parking numbers are anticipated to be determined at the works approval stage of any future development. TCCS requests further engagement with the NCA in addressing this aspect of the project and TCCS may seek further details during the works approval stage to ensure that the specifics of the parking arrangements are also compatible with any existing parking in the public domain.*

This comment is noted

4. Individual Public Submissions

The following have been extracted from submissions by John Konstantinou provided via email dated 19 and 20 December 2023.

4.1 Email dated 20 December

1. *Provide clarity on the operation of the Aged Care including number of employees and peak traffic generated by the Aged Care facility. The reports does not cover off these elements and cannot be related back to the overall traffic assessment.*

Traffic generation rates for the aged care facility are discussed in Section 7.2 of the Transport Assessment, noting this is based on a traffic generation rate per dwelling as sourced from Transport for NSW Traffic Generating Developments Updated Traffic Surveys TDT 2013/04a. At this early master planning stage, the exact number of staff is unknown. Notwithstanding, given staff typically work in shift work at aged care facilities, majority of staff would travel to and from the site outside of the road network peak periods¹ and hence defining the number of staff would not impact the suitability of the traffic generation rate adopted from Transport for NSW. Furthermore, TCCS have endorsed the Transport Assessment and hence the traffic generation rates have been considered suitable.

It is noted that access to the aged care facility is via a separate access road north of Schilch Street and hence no vehicles will access the site directly via the southern Banks Street/ Wilf Crane Crescent intersection.

2. *Provide explanation as to the 15% reduction in peak vehicle trips generated by the overall development. The report does not provide suitable justification as to what the reduction is applied to, why it is applied or, where it is applied and it is unclear as to how the reduced number of trips are represented in the overall Yarralumla Traffic model.*

¹ Shifts typically comprise 6:30am to 3:00pm, 2:30pm to 10:30pm and 10:30pm to 6:30am

When projects are considered for evaluation as part of a broader suburb or district area, it is usual practice to consider those trips which might remain in the area as opposed to those likely to be attracted to broader suburban or regional area destinations.

Refer to response to YRA page 26 comment, located in Section 2.3 above, that contains a detailed description around use of this discount in the Transport Assessment.

3. Vehicles accessing the site off Banks Street are nominated to have a 50/50 split between the north and south connections of Wilf Crane Crescent. As the majority of vehicles are approaching and departing to the south we believe the split will be closer to 75/25 with the majority of vehicles using the southern intersection. Additional justification of the nominated 50/50 split should be provided or the traffic model should be updated to represent the increased number of vehicles through the southern connection of Wilf Crane Circuit to Banks Street.

Wilf Crane Crescent is proposed to be two-way, with exception of the section adjacent to the Forestry School that will operate as one way consistent with the existing condition. The direction of flow for the one-way section will be confirmed during future design stages however for the purpose of modelling the traffic impact of the development, the one-way flow has been allocated as inbound only. This ensures a conservative assessment such that all traffic is required to egress via the southern access.

With this in mind, the modelling currently assumes that 100 per cent of vehicles egress the southern access and 50 per cent respectively enter the southern and northern access points, acknowledging that the shortest travel paths to Precinct C and D will be via the northern access.

Revising the split of vehicles entering the southern and northern access ultimately makes no difference to the uplift in traffic volumes at this intersection given all vehicles arriving from the south will ultimately travel through the intersection, whether that's to turn left into the site via the southern access or travel through to use the northern access.

4. How is speed along Banks Street being managed? Assessment of the section of Banks Street north of Bentham Street indicates the characteristics of a 60km/hr speed zone, not a 50km/hr Speed zone. Has an assessment on existing vehicle speeds been carried out? Are there any issues around existing vehicle speeds and if so and what is the development proposing to implement to control vehicle speeds into and out of the development on Banks Street.

The ACT Government has a systematic approach for determining, and where necessary reviewing, appropriate speed limits for roads in the ACT and this is not the responsibility for the proponent to review.

Low speed zonings of 40 kilometres per hour (or less) will be established within the site to ensure safety for cyclists/ pedestrians. Traffic calming measures (speed humps, etc.) will be used in conjunction with low-speed zonings. These details will be incorporated as part of further detailed design completed in future Works Approval Applications

5. The southern connection of Wilf Crane Crescent to Banks Street increases the number of vehicles through the intersection from 57 to 229 in the Peak AM period (400% increase) and from 71 to 216 in the Peak PM period (300% increase). We believe the actual increase in traffic through the intersection will exceed the nominated volumes as the traffic split between the north and south connections of Wilf Crane Crescent is not believed to be 50/50.

Refer to response to Correspondence received 20 December comment 3, located in Section 4.1 above.

6. The increase in traffic through the southern connection of Wilf Crane Crescent is anticipated to have an impact on the safety of cyclists and residents in this location due to:

- *Banks Street having on street parking permitted through the intersection on the eastern kerb.*
- *The useable pavement width being variable along Banks Street, ranging from nominally 7.62m down to 7.1m, with on street parking taking up nominally 2.4m of the available carriageway. Allowing for safe passing of on road cyclists and on street parking and a single vehicle travelling either north or south on Banks Street a carriageway width of 7.1m indicating that two vehicles could not pass each other on Banks Street if another vehicle was parked kerb side or there was an on road cyclist.*
- *The intersection whilst compliant with AS2890.1 is near the residential driveways of 26 and 28 Banks Street. The increase in traffic at the adjacent intersection will have an adverse impact on the reverse in or out movements required to enter or exit these adjacent residential driveways and should be considered in the context of the increased traffic volumes associated with the development.*

- *We understand that the road drainage system on Banks Street does not constrain stormwater runoff to the road reserve and stormwater overflows into adjacent residences. During times of inundation the useable width of Banks Street will be reduced and will have an impact on the capacity and safety of the intersection connection of Wilf Crane Crescent and Banks Street.*

The masterplan proposes to provide a shared bicycle and pedestrian path along the western edge of Banks Street, extending from Bentham Street through to Brown Street, significantly improving the safety for cyclists by separating these movements from the on-road environment.

To satisfactorily manage conflicts between frontage road traffic and car park traffic, Figure 3.1 of AS2890.1:20024 details prohibited location of access driveways proximate to an intersection. The existing domestic driveways at 26 and 28 Banks Street lie outside of the prohibited locations indicating they are suitably offset from Wilf Crane Crescent to minimise probability of conflict between vehicles. Further, AS2890.1 notes that Figure 3.1 does not apply to domestic driveways, implying that residential driveways do not generate daily traffic volumes at levels expected to result in any substantial conflict risk and hence are suitable to be located within the prohibited locations.

At this stage, no changes are proposed to the on-street parking environment given the level of traffic is not considered high enough to warrant such changes. Notwithstanding, parking could be restricted on the eastern kerb of the Banks Street/ Wilf Crane Crescent intersection should this be preferred by the community and approved by TCCS.

Reducing carriageway width is an effective measure for traffic calming, as vehicles are required to slow down to navigate the roadway. Should an event occur such that drainage results in a reduced carriageway width, this is not expected to impact vehicle's ability to safely navigate the intersection. To ensure appropriate width is maintained and as noted above, parking could be restricted on the eastern kerb of the Banks Street/ Wilf Crane Crescent intersection should this be preferred by the community and approved by TCCS.

7. We believe an alternate option for connecting the proposed development to Banks Street at Hooker Street in the form of a T-Intersection will achieve the following safety improvements: Locate the intersection where on street parking is currently not permitted, effectively increasing the available carriageway width and improving intersection safety. Stormwater flows towards Banks Street could be better managed before the connection to Banks Street, alleviating on street inundation and thus increasing the safety of this section of road. Locating the intersection away from residences and reducing the conflict between vehicles entering and existing adjacent residences and vehicles turning into and out of Wilf Crane Crescent

The relocation of the existing Banks Street/ Wilf Crane Crescent intersection to co-locate with the Banks Street/ Hooker Street intersection is not considered a necessary or practical solution for the following reasons:

- Section 6.1.3.2 of the Street Planning and Design, Municipal Infrastructure Standards 01 prepared by ACT Government dated September 2021 notes "Unsignalised four-way intersections should be avoided in street planning."
- The proponent does not own land along Banks Street proximate to Hooker Street, with this land owned by the ACT Government and occupied by the Forestry Oval. The existing lot boundaries are provided in Figure 4.1 and as shown, the site boundary between ACT Government / Forestry Oval and the proponent is located on the inside edge of Wilf Crane Crescent as it circulates around Forestry Oval.
- To comply with relevant road design and best practise guidelines, including need for vehicles to approach the intersection on a straight approach for sight lines and vehicle swept path purposes, the road would significantly encroach onto the south-eastern corner of the Forestry Oval land.
- The provision of an access at this location is likely to have a significant impact to public space and amenity afforded to the existing Forestry Oval. While the ACT Government could reclaim land where the existing Wilf Crane Crescent intersects Banks Street, this reclaimed land would have less public benefit than the existing land is afforded, given it will be separated from the Oval by a road.
- The relocation of the access road would require a further loss of existing trees and potential relocation of major infrastructure on ACT Government land, including power lines and stormwater noting existing stormwater drain at the Banks Street/ Hooker Street intersection.
- The creation of a four-way intersection at the Banks Street/ Hooker Street intersection would negatively impact the proposed new shared bicycle and pedestrian path along the western edge of Banks Street, through creating an additional opportunity for conflict between vehicles and users of the shared path (i.e. for vehicles traveling straight from Hooker Street onto Wilf Crane Crescent, crossing the shared path). The shared path crossing the existing Banks Street/ Wilf Crane Crescent intersection is a much more desirable outcome for users of the shared path.

Figure 4.1 – Lot boundaries



Source: Nearmap

The proposal to relocate Wilf Crane Crescent to form a new leg of the Banks Street/ Hooker Street intersection cannot be accommodated within the existing lot boundaries and would result in a significant impact to the amenity/ use of the Forestry Oval, as well as impact to existing trees and infrastructure. The relocation would also introduce additional vehicle conflict opportunities with the proposed shared bicycle and pedestrian path on the western edge of Banks Street that would not exist at the existing location.

As such, maintaining the intersection in its existing location is considered suitable and appropriate for the development.

4.2 Correspondence received 19 December

1. *The Stantec report classifies Banks Street as minor collector, although this would be an access Road B at best, noting that the access road Hutchinson Street has priority over Bentham Street.*

Banks Street has been elevated from an Access Street to a Minor Collector having regard to the passive use of the site's frontage for car parking and the absence of regular staggered car parking along this road length. Bentham Street has been elevated from an Access Street to a Minor Collector to reflect the operational function of the road as a mixed-use function which serves commercial development as well as residential access needs.

Since the new Territory Plan came into effect late 2023 and post submission of this application, the Estate Development Code 2013 is no longer in effect and ACT is moving towards a Movement and Place framework to define the role and function of streets, as discussed on page 40 of the ACT Transport Strategy 2020 and Section 4.2 of the ACT Urban Design Strategy 2023. Defining Banks Street and Bentham Street as Minor Collector recognises their movement and place functions consistent with the principles of Movement and Place.

2. *Traffic generation rates are in line with what we used at Gold Creek.*

TCCS have endorsed the Transport Assessment and hence the traffic generation rates have been considered suitable.

3. *A "discount" to the traffic numbers is apparently applied in Section 7.4, but it is unclear how this is applied in the modelling. Noting that the local intersections within Yarralumla are being modelled, these vehicle trips should still apply.*

Refer to response to Correspondence received 20 December comment 2, located in Section 4.1 above.

4. *The report does not consider the implications on the residential driveways at 26 and 28 Banks St, Yarralumla ACT 2600 that are within the intersection. Has an option to redirect the Wilf Crane Cres onto Hooker St which leads straight onto Novar St been reviewed.*

Refer to response to Correspondence received 20 December comment 6 and 7, located in Section 4.1 above.

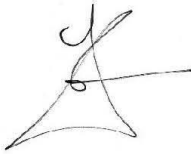
7. *General Open space and activity space that is not part of the oval?*

This comment will be addressed in the broader proponent team responses.

I trust this is satisfactory; should you have any questions, please do not hesitate to contact me directly.

Yours sincerely

Stantec Australia Pty Ltd



John Kiriakidis
Senior Principal Transport Advisory