



**Submission by the Yarralumla Residents Association on the National Capital Plan Draft
Amendment 97 Block 7 Section 4 Yarralumla (former Australian Forestry School)
November 2023, under the *Australian Capital Territory (Planning and Land Management)
Act 1988***

Yarralumla Residents Association

The Yarralumla Residents Association (YRA) Inc. is a non-profit association incorporated in the Australian Capital Territory. Its aims are:

- *To provide a focus and co-ordination point for representing the views of the Yarralumla community;*
- *To work towards maintaining and improving the quality of life of the Yarralumla community; and*
- *To keep the Yarralumla community informed about policy, environmental and social issues affecting or likely to affect Yarralumla.*

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.

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.

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:

- 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.

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.

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.



KEY ISSUES AND EXPLANATION

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).
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
 - 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”.
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.

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.

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 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 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 90° 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.



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:
 - 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.
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.

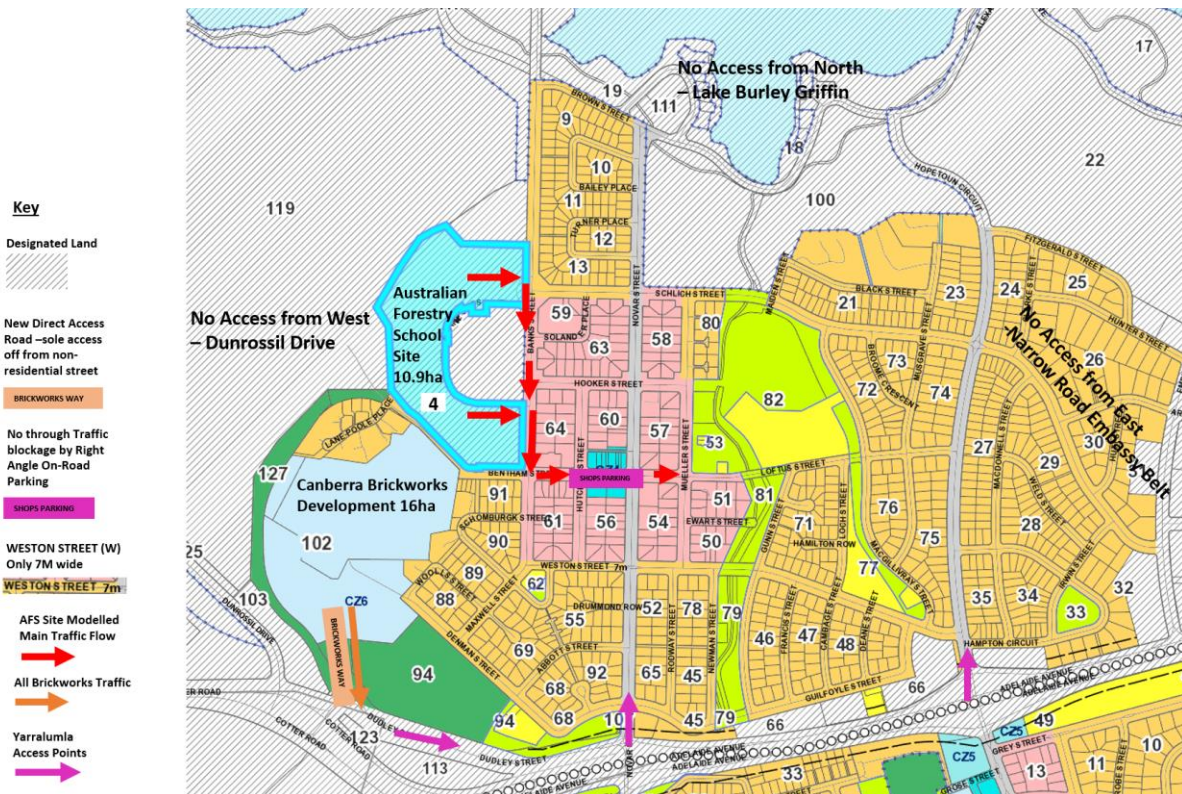
DETAILED ANALYSIS OF ISSUES AND IMPACTS

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 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)



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 3 Storey plus Attic | 300 Dwellings Maximum (includes social housing numbers) 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 |
| New direct Access Road to take all Traffic (Brickworks Road) | No new access road |
| 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 |
| Heritage protected through lease arrangements | Only heritage issues related to the development are referenced |

Traffic Impacts

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.

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.

Baselines, Traffic Generation and Routing Issues (also see Appendix)

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.

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.

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 90° 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 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’ 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.

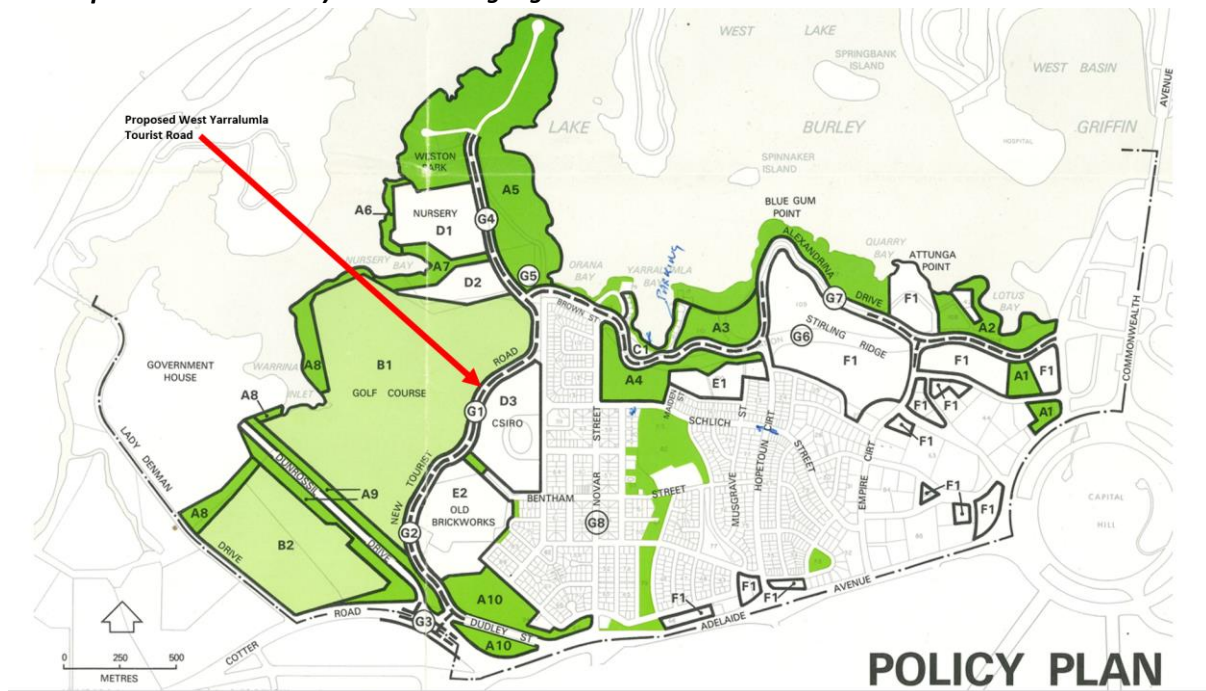
The traffic issues identified above show that the impact of a development of this scale on the surrounding street hierarchy and its integration with the existing network has not been adequately considered. Nor has the ability of the surrounding centre hierarchy to accommodate the development been analysed,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

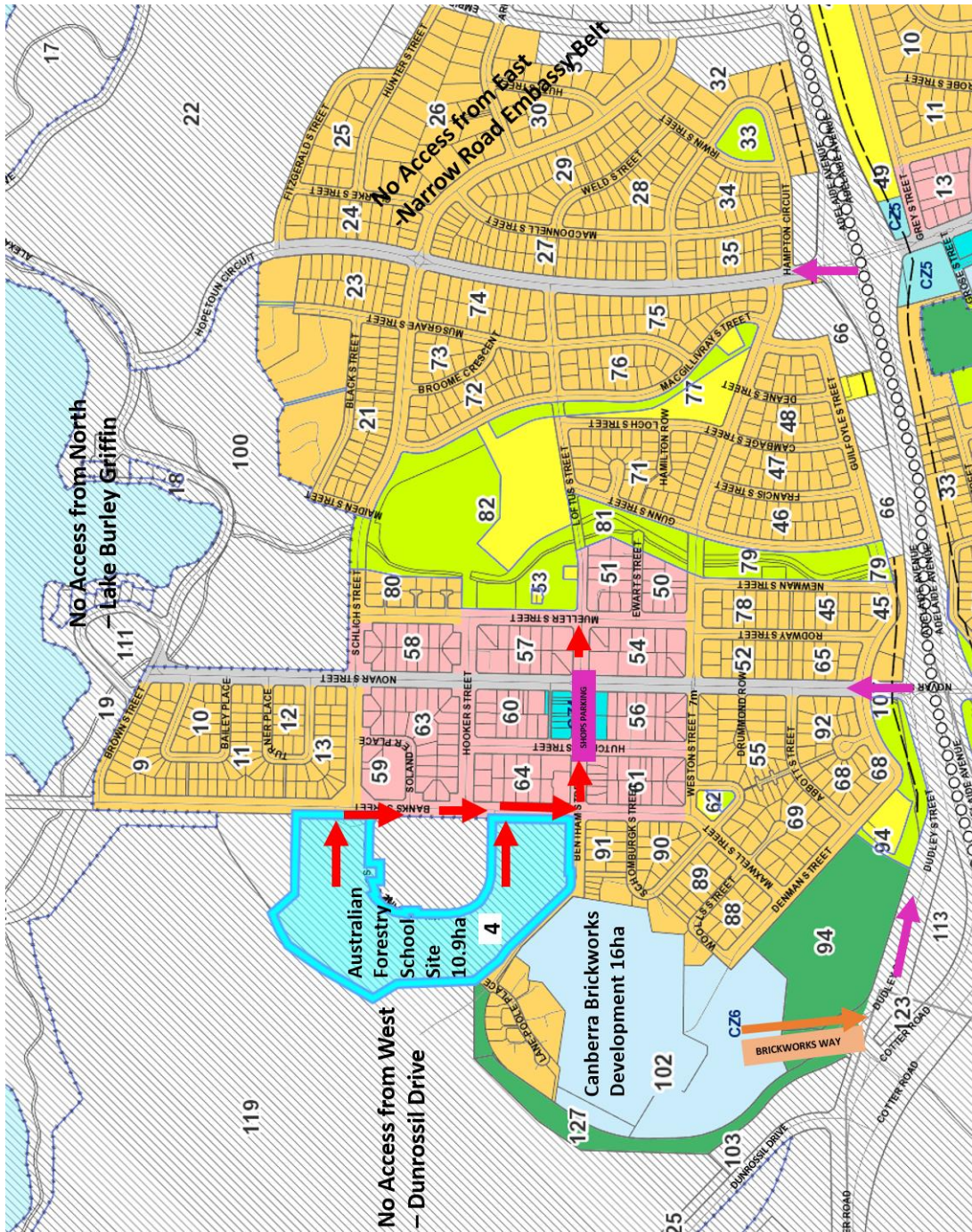


Australian Forestry School Wilf Crane Crescent one-way traffic



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
 - SHOPS PARKING
 - WESTON STREET (W) Only 7M wide
 - WESTON STREET - 7M
 - 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

Nov 14 79

R. J. K. Smith

National Capital Development Commission

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

The Commission policy for Yarralumla has been to maintain its residential character while at the same time catering for other activities. Recent pressures 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 adopted 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 issues.

Proposed West Yarralumla Tourist Road

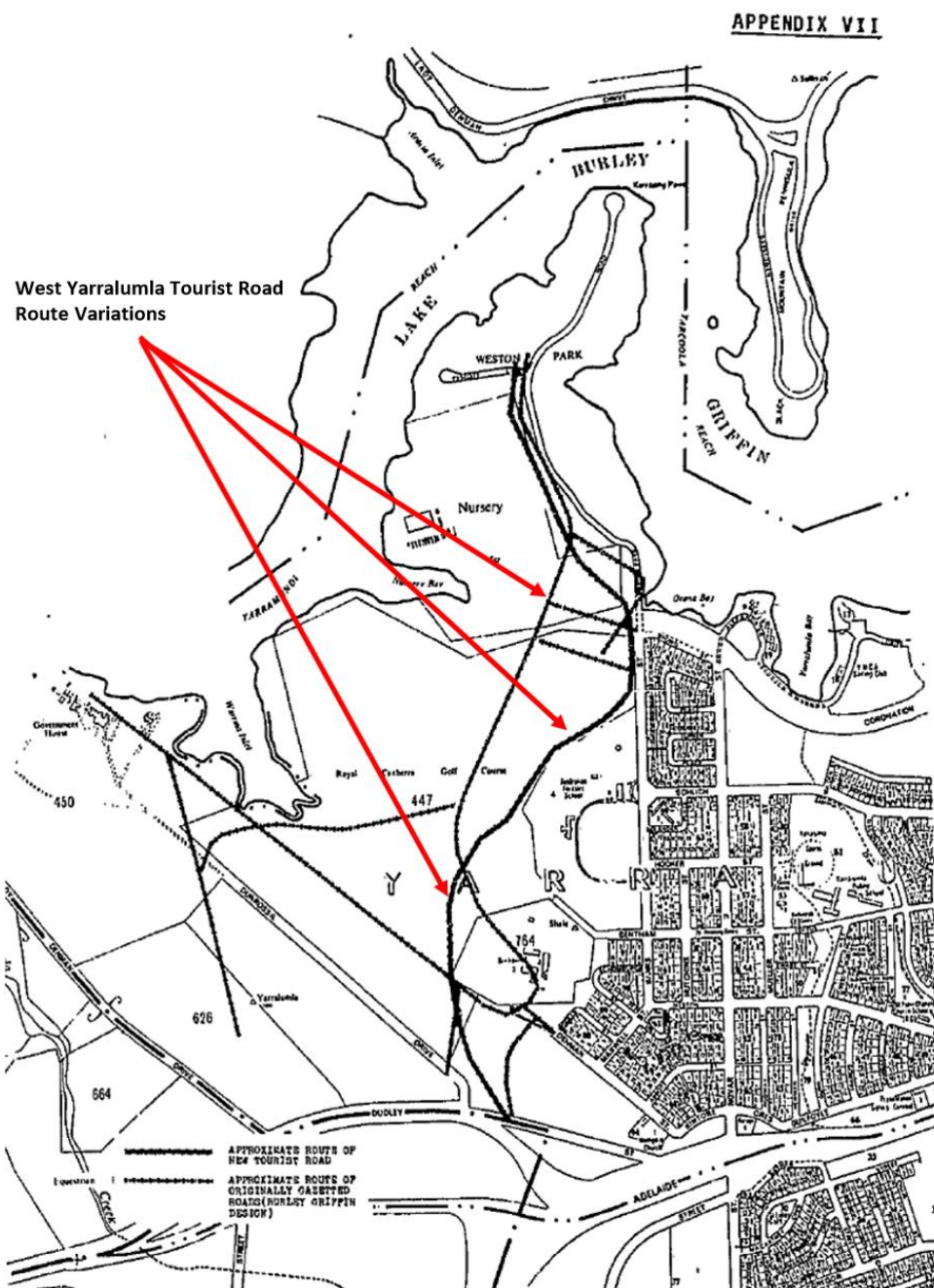
POLICY PLAN

0 200 400 METRES
NUMBERS ON MAP REFER TO POLICIES BELOW

| General Policies | Specific Policies | Communications and Movement |
|--|--|---|
| <p>1. Land Use The policy is to provide for additional demands for recreation, housing, National Capital and tourist uses in a manner compatible with the existing use and amenity of the Yarralumla area.</p> <p>2. Communications and Movement 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>3. Landscape The policy is to maintain and enhance the character of Yarralumla and to improve the perception and appreciation of the lakeshore and environs as an integral part of the National Area.</p> | <p>Land Use</p> <p>A. Open Space/Recreation A.1 Open space in its natural state accommodating a possible pedestrian route to Capital Hill. A.2 Lotus Bay - Alexandrina Drive is to be relocated to allow for increased recreation use, particularly for public sailboat rigging, launching and boat trailer parking. A.3 The hinterland to Yarralumla Beach is to be developed as open space related to the beach and bay, with the opportunity for informal sports. In the long term the area may be developed more intensively as a park with major recreation facilities. Alexandrina Drive is to be relocated to allow more effective recreation use of the beach and its immediate hinterland. A.4 This area is to be retained for recreation use. A.5 Weston Park current intensive recreation uses are to be extended through additional areas being made available progressively by the contraction of the nursery site. Consideration will be given in the long term to relocating the existing access road so as to allow more effective use of lakeshore parklands and to create a more attractive approach using the existing avenue of elms, along the central ridge. A.6 The lakeshore to the Nursery is to accommodate a pedestrian trail linking Weston Park to Nursery Bay. A.7 Nursery Bay is to be developed as a secluded informal picnic area with only limited car access. A.8 The Golf Course and Government House perimeter is to accommodate pedestrian, cycle and equestrian trails. A.9 Dunrossal Drive landscape setting is to be retained. A.10 The area along Dudley Street and Cotter Road is to be retained as a buffer between Inner Canberra and Wooden.</p> | <p>G. Vehicular Access G.1 A new tourist/recreation road is to be provided to the west of the Brickworks and CSIRO site to facilitate recreation access to the Brickworks, Royal Canberra Golf Club, Weston Park, and the lakeshore, and to avoid the need for this access to be via internal residential streets. G.2 To allow early redevelopment of the Brickworks site, it is proposed that initially this tourist road be constructed only from Cotter Road to a point south of Bentham Street. G.3 The Dunrossal Drive - Cotter Road and Dudley Street - Cotter Road intersections are to be improved to allow for increasing traffic to the Brickworks, Weston Park and the lakeshore, while achieving a degree of separation from Government House traffic. G.4 The Weston Park road is to be realigned to the avenue of elms on the nursery boundary to form an extension of the proposed western tourist road. G.5 The connection of the tourist road to Alexandrina Drive is to bypass Brown Street. G.6 The previously gazetted alignment for Coronation Drive, which has never been constructed, is to be degazetted. G.7 Alexandrina Drive is to be retained as a continuous low-speed tourist recreation route along the lakeshore with realignments being progressively made in conjunction with related landscape works. G.8 Traffic management measures are to be taken as required to reduce traffic speed in Novar Street. H. Pedestrian, Cycle and Equestrian Access H.1 A cyclepath is to be provided along the foreshore to complete the trunk paths from Wooden to City and around Lake Surley Griffin. H.2 Pedestrian access is to be maintained along the lakeshore and throughout Weston Park.</p> |
| | <p>B. Restricted Access Open Space B.1 The Royal Canberra Golf Course existing boundary and access is to be redefined to allow for the new tourist road. Consideration may be given to the extension of the existing golf course into area B2. B.2 The existing agistment area is to be retained as restricted open space for agistment, equestrian, golf course or other appropriate uses which reinforce the existing landscape setting in the vicinity of Government House.</p> <p>C. Tourism, Entertainment and Clubs C.1 Yarralumla Bay is to be developed for public recreation and tourist activities.</p> <p>D. Public Utilities D.1 City Parks Administration Yarralumla Nursery is likely to be reduced in area. The resulting residual areas will be used for public recreation or restricted access open space. D.2 Land use to be determined.</p> <p>D.3 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>E. Residential E.1 Section 100, five hectares are available for medium density townhouses. Development is to be in scale with adjacent existing development and to allow the retention of existing important views. Existing trees are to be substantially retained and used to provide a strong landscape setting for development. Public pedestrian paths between the sites to the lakeshore are to have a landscape setting. Vehicular access is to be from Meliden and Musgrave Streets and Hoppeloun Circuit. E.2 The Old Brickworks site and environs is to be redeveloped for medium density housing and/or tourist recreation use. E.3 No change in the current residential land use policy is proposed for existing residential areas.</p> <p>F. National Capital Uses F.1 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 reserved on Altunga Point and Slirring Ridge.</p> | |

**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 90° 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 90° 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 90° or 60° 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.