

EPBC 2021-8937 Forestry Place CSIRO Block 7 Section 3 Yarralumla

Public Exhibition Submissions and Proponent Responses

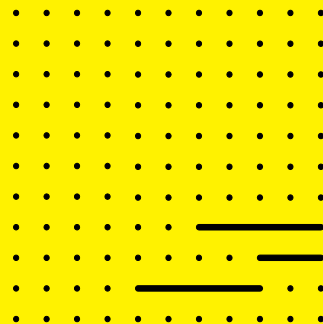
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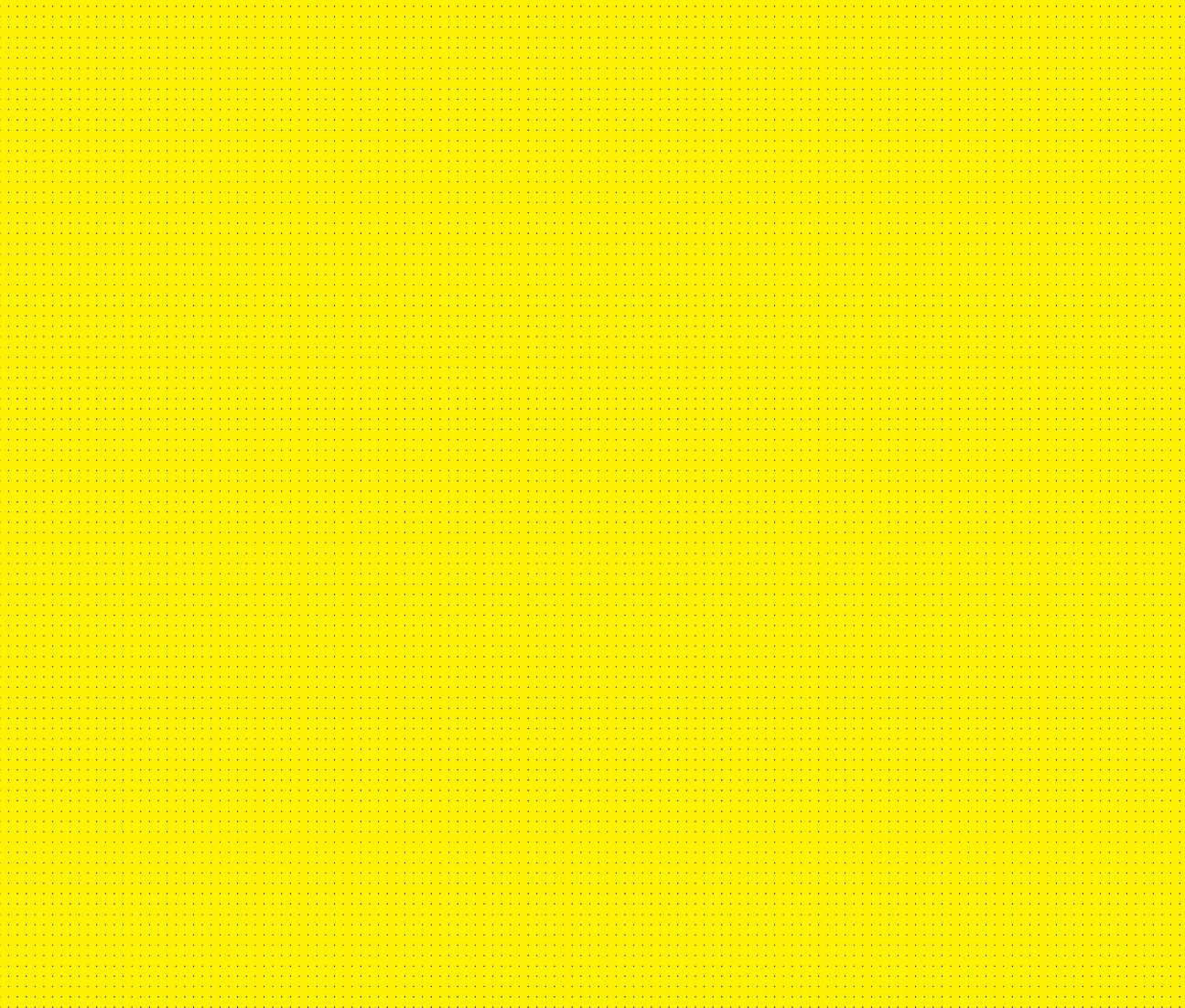
GUNYAR Pty Limited

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Quality Management			
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1 INTRODUCTION

This document has been prepared by Canberra Town Planning (here after referred to as **CTP**) on behalf of the Oakstand project team and under instruction by GUNYAR Pty Limited. The document has been prepared following the completion of the public exhibition period for EPBC 2021-8937 Forestry Place CSIRO Block 7 Section 3 Yarralumla exhibited from 7 December to 21 December 2022. During the exhibition period a total of four (4) submissions were received, including:

1. [REDACTED]
2. [REDACTED]
3. [REDACTED]
4. [REDACTED]

The Oakstand project team welcome the submissions and note that many of these stakeholder groups have been consulted and engaged with for the duration of the project. Most recently this included the presentation and discussion of the revised master plan at key stakeholder consultation in February and March 2022.

A review of the [REDACTED], [REDACTED] and [REDACTED] submissions indicates that the commentary does not object to the proposed action nor the revised master plan. Rather the submissions provide commentary and observations on the revised master plan, specialist reports and studies, along with reaffirming the need to conserve important heritage buildings, significant trees and the historic landscape character of the site. In addition, some of the commentary relates to the future detailed design and siting as part of realising the revised master plan. This detailed design work will not be undertaken until later stages of the project and does not form part of EPBC 2021-8937 proposed action. Although this work is yet to be undertaken the Oakstand project team will continue to engage with these important stakeholder groups during the next phases of the project.


The submission prepared by representatives from the [REDACTED] objects to the revised master plan and EPBC 2021-8937 proposed actions. The key matters raised include YRA community consultation results, heritage, new building footprints, traffic and loss of amenity. The Oakstand project team will continue to engage with [REDACTED] for the future stages of the project.

A more in depth review and response to the key and detailed matters raised in the submissions are considered in the following sections of this document. [REDACTED]

[REDACTED]

The document sections and attachments are summarised below:

- Section 2 Public Exhibition and Submission Summary – this includes an overview of the public exhibition period, summary of the key submission matters and applicant responses, and finally contains a list of all information provided to the minister in relation to EPBC 2021-8937 proposed action.

- Section 3 Public Submission Review– this section of the document includes a more detailed review of specific submission matters and details applicant responses.
- Section 4 Conclusion– brief conclusion to the document.
- 
- Attachment 2 – Public Exhibition Notice EPBC 2021-8937 from the Canberra Times 7th December 2022.

This document has been prepared in accordance with the requirements of section 95B Procedure after end of period for comment of the *Environment Protection and Biodiversity Conservation ACT 1999 (EPBC Act)* and is provided to the Department of Climate Change, Energy, the Environment and Water and Minister for determination of EPBC 2021-8937 Forestry Place CSIRO Block 7 Section 3 Yarralumla.

2 PUBLIC EXHIBITION AND SUMMARY OF RESPONSES

2.1 Overview of EBPC 2021-8937 Public Exhibition

The exhibition of EPBC 2021-8937 Forestry Place CSIRO formally identified as Block 7 Section 3 Yarralumla was undertaken from 7 December to 21 December 2022. Mailed submissions were received until 1pm on 22 December 2022.

The exhibition notice was published in the Canberra Times on 7th December 2022. The exhibition notices are detailed in the figures below and included in **Attachment 2**.

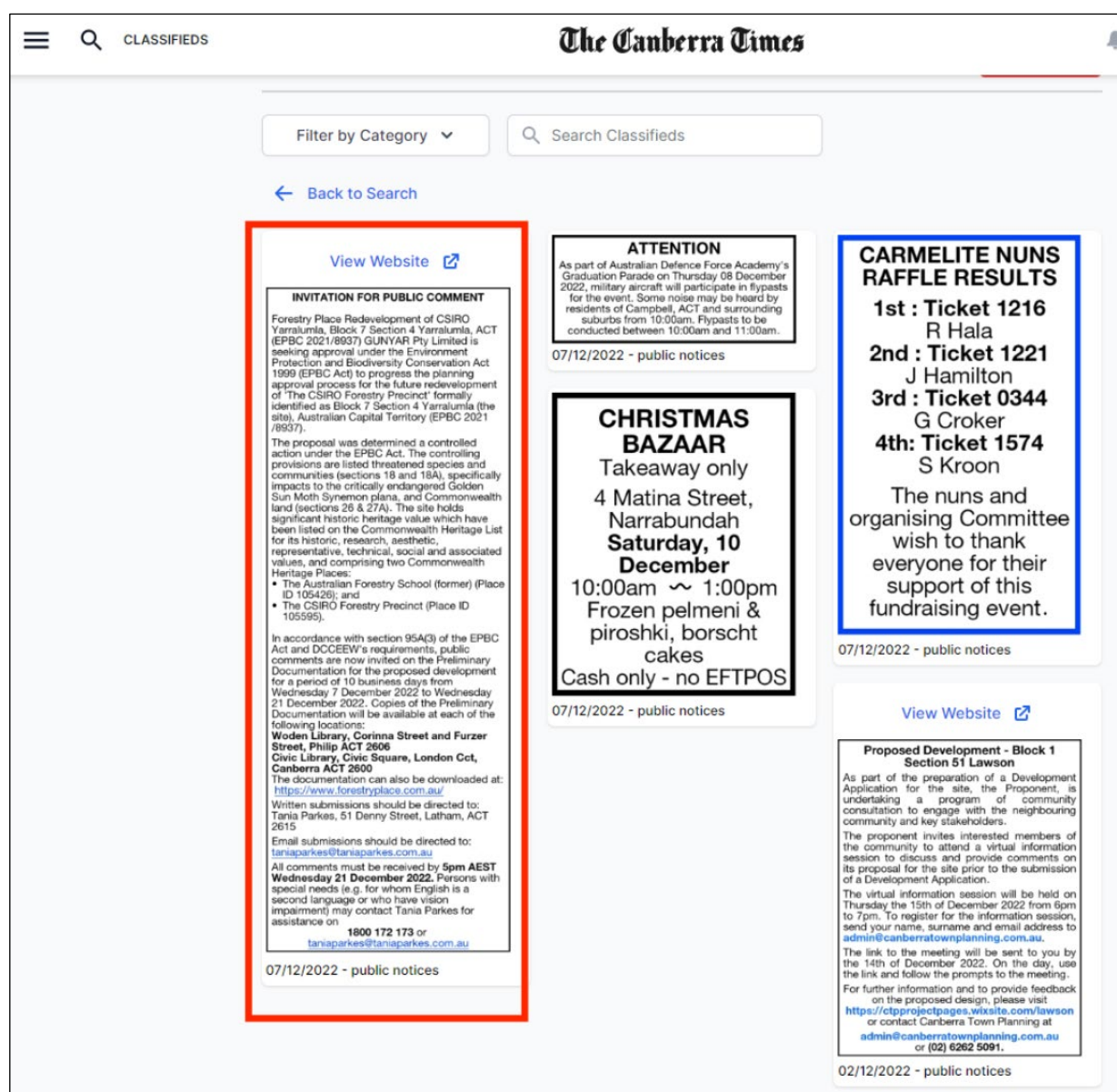


Figure 1: Invitation for Public Comment (EPBC 2021/8937) published in the Canberra Times on 7th December 2021 (outlined in red).

Exhibition of the Preliminary Documentation Package was completed as per the directions of the Department and provisions of the *EPBC Act* and included electronic and hard copies of the documentation package accessible at the following online and hardcopy locations:

Online

<https://www.forestryplace.com.au/public-notice>

Hard Copies at the following Canberra locations:

- **Woden Library**, Corinna Street and Furzer Street, Philip ACT 2606
- **Civic Library**, Civic Square, London Circuit, Canberra ACT 2600

2.2 Summary of Public Submissions and Key Matters

A total of four (4) submissions were received during the public exhibition period from the following stakeholder groups.

1. [REDACTED]
2. [REDACTED]
3. [REDACTED]
4. [REDACTED]

A review of the [REDACTED] [REDACTED] submissions indicates that the stakeholder can be reasonably characterised and generally supportive in relation to the proposed action and revised master plan. The submissions provide commentary and observations on the revised master plan, specialist reports and studies, along with expressing importance for preserving heritage buildings, significant trees and landscape character of the site. While the submission prepared by representatives from the [REDACTED] objects to the revised master plan and EPBC 2021-8937 proposes actions for a number of reasons.

Although key matters and comments provided in each submission vary depending on the stakeholder group, for simplicity a summary of the key matters is provided below, while responses to specific submissions commentary are contained in the following section of this document.

- Conservation of trees and the sites historic landscape character
- Heritage conservation and adaptive reuse of heritage buildings
- Traffic
- [REDACTED] Community consultation
- Request for ongoing stakeholder consultation and support for revivifying trees and sites landscape character

Commentary on the key matters is provided under the above heading below.

Conservation of trees and the sites historic landscape character

All submissions included commentary on existing trees and the sites historic tree plantings, and landscape character. The submissions expressed a desire to ensure the significant trees/groups of trees and the sites landscape character are appropriately considered and where necessary preserved as part of any future redevelopment of the site.

The goal of the Oakstand project team and GUNYAR Pty Limited has been to work with the natural landscape integrating with the site's topography. The revised master plan has been informed by a location and condition survey of all trees on the site, and incorporates landscaping that will respect the site's history and the significant trees. This work is reflected in the proposed landscape/architectural master plans, detailed tree assessment report and Heritage Impact Assessments all reports/studies have considered and assessed how best to protect, manage the sites significant trees, renewal aging or dead trees and revivify the sites unique landscape character.

This work has been completed in close consultation with the [REDACTED] [REDACTED] who advise that a program of tree renewal would be appropriate as many plantings require thinning and are reaching end of life. They have generously offered to advise the project's landscape architect on appropriate tree species as the project progresses.

Conservation of trees, groups of trees and the historic landscape character are covered in extensive detail in specialist studies and reports forming part of EPBC 2021-8937. This includes but is not limited to the detailed tree assessment report and mapping, heritage impact reports and summaries, environmental reporting, urban design report and, landscape and architectural master plans. The supporting specialist reports, studies and drawings will ensure the conservation of significant trees, groups of trees and the sites unique historic landscape character.

Heritage conservation and adaptive reuse of heritage buildings

Submissions from the [REDACTED], [REDACTED] and [REDACTED] commented on the importance and need to conserve a number of heritage buildings within the site and where necessary protect the buildings as part of any future development and/or adaptive reuse.

Detailed Heritage Impact Assessments (HIA) and supplementary heritage reports has been completed and form part of the Preliminary Documentation package EPBC 2021-8937 for the proposed action. The heritage reports and studies have been completed noting the property is recognised as being of Commonwealth heritage significance for its association with the CSIRO Forestry Precinct and as the site of the Former Australian Forestry School [CHL Place ID: 105426 and Place ID: 105595). The HIA has been prepared in accordance to the EPBC Act *Significant Impact Guidelines 1.2: Actions on, or impacting upon, Commonwealth land and Actions by Commonwealth Agencies for Commonwealth Heritage Places* and having regard to the proposed urban design report and revised master plan prepared by architects Kann Finch and landscape architects Oxigen.


The HIA identifies a number of buildings with heritage values as either high or moderate significance, which includes the Australian Forestry School, the former Museum, Store, Tennis Courts and Forestry House. The revised master plan indicates that these buildings will be retained, protected and adaptively reused in a manner which retains and protects their heritage values. These buildings and structures represent important phases in the site's history and their conservation will allow for the values and history of the site to be preserved within the context of the forestry school.

To conserve the heritage values of the site a number of heritage strategies have been incorporated into the urban design report and master plan prepared by Kann Finch and Oxigen. These strategies are briefly summarised below and can be reviewed in detail within the HIA.

- Strategy 1: Heritage Advisory Role - Recommendation to engage an appropriately qualified heritage consultant or heritage architect as an 'on-call' ad-hoc Heritage Advisor for the detailed design and development phases of the proposed action.
- Strategy 2: Conservation Management Plan (CMP) - Recommendation to prepare a CMP for the whole Site with particular emphasis on buildings 9, 10, 17 and 30 prior to the adaptive reuse of these buildings.
- Strategy 3: Interpretation - Recommendation is to develop a whole-of-site Interpretation Plan that considers the feasibility of the interpretive measures above, as well as design, audience and implementation.
- Strategy 4: Construction of Glasshouse - Recommendation to reconstruct a Glasshouse of similar design in an appropriate location within the Site to be used for integration into shared gardening program or other identified resident or community use.
- Strategy 5: Tree Retention - Recommendation to retain as many groups of singular species as possible. Where removal of these groups is necessary, retain the healthiest trees and replant the species in a similar pattern.
- Strategy 6: Replacement Program - Any future replanting programs should prioritise individual species and groups of species that are proposed for removal and planted in a way that demonstrates the history of tree propagation and research at the Site.
- Strategy 7: Photographic Recording - Recommendation to prepare photographic recordings of all buildings prior to their demolition, and the treescape prior to tree removal.

The above outlined strategies could form part of EPBC Act determination and are considered to address the matters raised in submissions.

Traffic

The submission from the  raises concerns regarding potential impact from traffic as a result of the future redevelopment of the site. The Oakstand project team has been acutely aware of potential impacts from traffic on the broader suburb of Yarralumla. To address these concerns a very detailed Transport Impact Assessment (TIA) was undertaken by Stantec (formerly GTA Consultants Group Pty Ltd). The TIA provides an extensive analysis of the site and proposed/revised master plan. The purpose of the TIA is detailed below:

- Existing traffic and parking conditions surrounding the site as well as current projects in the area.
- The adequacy of existing public transport services.
- The suitability of the proposed parking arrangements.
- Trip generating characteristics of the proposal.
- Suitability of future transport access arrangements for the proposal.
- Transport impact of the proposal on the surrounding road network.

The TIA references and has regard to a variety of policies detailed by the NCA, ACT Government (including Transport Canberra and City Services) and a number of Australian Standards. Furthermore, the TIA provides a detailed traffic impact analysis of the surrounding road network and key

intersections. The traffic impact analysis has had regard to the proposed quantum of land uses proposed in the master plan. The key matters extracted from the TIA conclusion are summarised detailed below:

- The masterplan could potentially generate 220 and 227 vehicle trips during the weekday AM and PM peak periods, resulting in a net increase of around 80 to 120 vehicle trips in any peak hour compared to the full development of scientific research floor space currently permissible on site.
- The territory government have allocated funding to an upgrade of the Adelaide Avenue interchange with Novar and Kent Street in Yarralumla, including signalisation of the three priority-controlled intersections. Work on one of these intersections has commenced.
- The operating performance of the road network post development of the masterplan is consistent with road network performance given full development permissible under the existing lease agreement, with average increase to delays of one second and average increase in Degree of Saturation of 0.03.
- The development has been designed to ensure a high level of pedestrian permeability and movement with provision of (amongst other things) a new shared bicycle and pedestrian path proposed along the western side of Banks Street between its intersection with Bentham Street and Brown Street. If approved these facilities will improve connectivity and accessibility to the lake and foreshore bicycle and walking tracks, as well as provide publicly accessible pedestrian paths through the site.
- The access roads, including Wilf Crane Crescent and the aged care access, are expected to operate within acceptable operating parameters.
- Final car parking numbers for the project are expected to be determined at works approval stage of any future development. Notwithstanding, the current master plan can provide parking consistent with the Territory Plan Parking and Vehicular Access General Code expectations.
- The proposed parking layout and loading areas will be progressed during the works approval stage of any future development to be consistent with the dimensional requirements as set out in Australian/New Zealand Standard for Off Street Car Parking (AS/NZS2890.1:2004, AS/NZS2890.2:2018 and AS/NZS2890.6:2009).

The ACT Government - Transport Canberra and City Services Division has accepted the modelling (which has been based upon the TCCS model and incorporates the Brickworks and Forestry Place traffic generation upon completion). Included in their considerations is that the CSIRO lease allowed for a further 10,000 square metres of GFA, which if it had been realised, would have increased traffic flow to a similar level as the proposed development.

Community Consultation

The submission from the [redacted] contends that the proposal has not adequately considered the results of the community consultation completed by the [redacted]. This community consultation comprised of a one off online survey. The proponents reviewed the survey during the consultation period and observed that this public consultation was not undertaken in accordance with nor having regard to the best practice requirements of International Association for Public Participation (IAP2) standards and the survey comprised of leading questions. Accordingly, the results of this resident survey are not considered reliable and should not be relied upon for determining the EPBC 2021-8937 proposed action.

Tania Parkes Consulting has led the Oakstand project team community consultation and engagement program since mid-2020. Tania Parkes Consulting is accredited in the delivery of the best practice community consultation and engagement under the International Association for Public Participation (IAPR2) standards, and conducted the community consultation and engagement program in accordance with and beyond the minimum prescribed public consultation requirements of the National Capital Authority.

The Oakstand project team public consultation engagement program took time to develop a draft master plan with ongoing input from key stakeholders (which included YRA representatives), prior to taking the draft to broader community consultation. The Oakstand project team developed the draft master plan through multiple workshops and roundtable discussions with key community stakeholders from July to October 2020.

The Oakstand project team then sought feedback from the broader Yarralumla and surrounding communities in November 2020, prior to refining and finalising the draft master plan. A total of three thousand one hundred and seventy-six (3,176) interactions occurred with those who participated in the consultation process from July to November 2020. Following feedback from the NCA and community the revised master plan presented and discussed at key stakeholder consultation in February and March 2022. Following the stakeholder consultation, the revised master plan and amendment to the National Capital Plan was submitted to the NCA in May 2022.

The EPBC 2021-8937 Preliminary documentation package is accompanied by numerous Forestry Place Consultation Reports and Summary Reports prepared by Tania Parkes Consulting and which document in detail the extensive program of stakeholder and community consultation along with responses to specific matters.

Request for ongoing stakeholder consultation and support for revivifying trees and sites landscape character

Both [REDACTED] and [REDACTED] has requested that they continue to be engaged with during the next stages of the project. The Oakstand project team and Gunyar Pty Limited are committed to the ongoing engagement with the key stakeholder group for the duration of the project. The list of stakeholder groups is provided below and details regarding engagement can be found in the Public consultation reports and summaries reports by Tania Parkes Consulting which are included in the Preliminary Documentation Package forming part of the EPBC 2021-8937 submission.

[REDACTED]

Finally, it is noted that [REDACTED] and [REDACTED] submission has expressed support for actively revivifying the trees and the sites landscape character via the proposed redevelopment.

2.3 List of Information Provided to the Minister

The below list includes all preliminary documentation and referral documentation submitted to the department and put on public exhibition.

Preliminary Documentation:

- Site Survey
- Ecology Assessment of the Significance of the Impact on Golden Sun Moth (Synemon Plana)
- Forestry Place EPBC Referral PD Heritage Response Final (1)
 - Heritage Assessment
 - Aboriginal Cultural Heritage Assessment
 - Heritage Impact Assessment
- Forestry Place – Response to DAWE Letter (Requested Names Redacted)
- Forestry Place – Height Plan
- Forestry Place – Landscape Masterplan
- Forestry Place – Landscape response to clarifications (Requested Names Redacted)
- Forestry Place – Shadow Plans
- Forestry Place – Capital Investment Value
- Block 7 Section 4 Yarralumla Social Impact Report FINAL 25.07.2022
- Forestry Place – EPBC Referral Follow Up (Requested Names Redacted)
- Forestry Place Supplementary Consultation Report – Revised Master Plan FINAL (updated 28.10.22)
- Block 7 Section 4 Yarralumla – Community Consultation Report dated 2021
- Forestry Place – Aborigicultural Assessment Report
 - A0 – Tree Location Plan
- Planning Report and Appendices (FINAL) – Disclaimer Included
- Gunyar Letter Environmental History

Referral Documentation:

- Referral Document
- Golden Sun Moth Targeted Survey
- Ecological Study Area Map (Final)
- Heritage Impact Statement Study Area (Final)
- Forestry Place Precinct Heritage Assessment (Included in Preliminary Documentation)
- Yarralumla – Ecological Values & Constraints Assessment

3 PUBLIC SUBMISSION REVIEW

This section of the document provides a detailed review and response to all of the matters raised in the public submissions. For completeness the table starting on the following page details comment from each submission and provides an proponent response. The below table outlines on what pages each submission and response is located.

Submission	Table - page references
[REDACTED]	Pages 14 to 17
[REDACTED]	Pages 18 to 24
[REDACTED]	Pages 24 and 25
[REDACTED]	Page 26



Table 1: Public submission extracts and applicant responses.

Public Submission Extracts	APPLICANT RESPONSE
<p>The [REDACTED] have also carried out a comprehensive assessment of the trees on the site, similar to that undertaken by Canopy tree experts, dated 18 August 2020. In our opinion many of the trees on the site are past or at their safe useful life expectancy or nearing the end of their genetic life expectancy. There are some trees or groups of trees which we believe are worth retaining either for their current condition, their relationship to the Heritage Buildings and anticipated life expectancy or their association with the site, its purpose, its students and anticipated life expectancy.</p>	<p>The proponent the commentary by [REDACTED] and detailed assessment undertaken of trees within the site. The proponent is appreciative of the collaborative manner [REDACTED] has worked with the project landscape architects, heritage consultant and architects. The proponent welcomes the opportunity to work with [REDACTED] on the next stages of the project where additional consideration of trees will be completed as part of the detailed design phase of the project, in the event EPBC and NCA approvals are secured.</p>
Individual Trees	
<p>A & B Registered trees – Atlantic Cedar. Street trees and outside the site. Need to be well protected during development.</p>	<p>Noted. All tree protection requirements will form part of any subsequent Works Approvals from the NCA or tree protection requirements issued by TCCS.</p>
<p>C Tree 1445 – Pinus species. Outside the site. Shown as Exceptional.</p>	<p>Noted. The proposed action is limited to Block 7 Section 3 Yarralumla and no impacts are proposed to trees beyond the site.</p>
<p>C Tree 1445 – Pinus species. Outside the site. Shown as Exceptional.</p>	<p>Noted. The proposed action is limited to Block 7 Section 3 Yarralumla and no impacts are proposed to trees beyond the site.</p>
<p>D Tree 567 – Eucalyptus albens. Outside the site. Shown as Exceptional.</p>	<p>Noted. The proposed action is limited to Block 7 Section 3 Yarralumla and no impacts are proposed to trees beyond the site.</p>
<p>E Tree 581 – Araucaria bidwillii. Shown as Exceptional. We agree with this classification.</p>	<p>Noted. The proposed action is limited to Block 7 Section 3 Yarralumla and no impacts are proposed to trees beyond the site.</p>
<p>F Tree 293 – Pinus ponderosa. Outside the site. Shown as High.</p>	<p>Noted. The proposed action is limited to Block 7 Section 3 Yarralumla and no impacts are proposed to trees beyond the site.</p>
<p>G Trees 305 & 306 – Cupressus sempervirens stricta. Shown as High. We agree with this classification. Trees closely associated with the site. To be retained. Need to be well protected during development.</p>	<p>Noted. The proposed action is limited to Block 7 Section 3 Yarralumla and no impacts are proposed to trees beyond the site.</p>
Tree Groups	
<p>1 Atlantic cedar shown as Medium quality. <u>Our assessment:</u> Poor – Medium.</p>	<p>Noted and no response required.</p>
<p>2 Mixed Eucalypts shown as Medium quality. We agree with this classification.</p>	<p>Noted and no response required.</p>
<p>3 Pinus radiata shown as weed species. We agree with this classification.</p>	<p>Noted and no response required.</p>
<p>4 Mixed Pinus species shown as High Quality. We agree with this classification.</p>	<p>Noted and no response required.</p>

Public Submission Extracts	APPLICANT RESPONSE
5 Canary Island pines shown as High Quality. <u>Our assessment</u> : Trees in good condition and an excellent replacement for Pradiata. Probably planted by students post opening of the School. Anticipated life expectancy of more than 25 years. Must be retained. Of high to very high value. Need to be well protected during development.	Noted. The proposed master plan generally seeks the retention of high quality trees within the site, where feasible. Consideration on the retention of this tree would be considered as part of a future Works Approval application which will include the submission of a detailed arborist assessment. The master plan and landscape master plan strategy also provides for replanting replacement trees across the site where trees are removed.
6 Pinus Roxburghii, Chir Pine shown as High quality. We agree with this classification.	Noted and no response required.
7 English Oak shown as Poor quality. We agree with this classification.	Noted and no response required.
8 Pin Oak shown as Medium quality. We agree with this classification.	Noted and no response required.
9 Brachychiton shown as Medium quality. <u>Our assessment</u> : An excellent example of ‘circular planting’, probably planted by Weston and practiced by Lindsay Pryor, an ex-student of the School. This is a slow growing, long lived species in good condition. Anticipated life expectancy of 50+ years. Must be retained. Of high to very high value. Need to be well protected during development.	Noted. The proposed master plan generally seeks the retention of trees within the site, where feasible. Consideration on the retention of this tree would be considered as part of a future Works Approval application which will include the submission of a detailed arborist assessment. The master plan and landscape master plan strategy also provides for replanting replacement trees across the site where trees are removed.
10 Pinus radiata shown as Weed species. We agree with this classification.	Noted and no response required.
11 Canary Island pine shown as High Quality. We agree with this classification.	Noted and no response required.
12 Pinus radiata shown as Weed species. We agree with this classification.	Noted and no response required.
13 Mixed eucalypts shown as Poor quality. We agree with this classification.	Noted and no response required.
14 Quercus robur shown as Medium quality. We agree with this classification.	Noted and no response required.
15 Pinus species shown as Poor quality. We agree with this classification.	Noted and no response required.
16 Eucalypts species shown as Poor quality We agree with this classification.	Noted and no response required.
17 Pinus & Eucalyptus shown as Poor quality. We agree with this classification.	Noted and no response required.
18 Pinus pinea shown as High quality. <u>Our assessment</u> : A dense stand of close planted Pinus pinea. Many deformed by close planting and internal shading and deaths evident. The planting will not respond to selective thinning and foliage will not regrow from bare trunks. Trees have lost their ‘umbrella-like’ form. Continuing tree falling likely. An aged plantation at the end of its safe useful life. As a group of trees assessed as poor quality.	Noted. The proposed master plan generally seeks the retention of trees within the site, where feasible. Consideration on the retention of this tree would be considered as part of a future Works Approval application which will include the submission of a detailed arborist assessment. The master plan and landscape master plan strategy also provides for replanting replacement trees across the site where trees are removed.
19 Pinus ponderosa shown as High quality. <u>Our assessment</u> : Across Canberra mature and over mature Pinus ponderosa are affected by the needlecast fungus, Lophodermium sp., in the canopy needles. This leads to the decline of the trees. Examples of this fungal	The tree assessment notes the current stage and quality of Pinus ponderosa. We acknowledge the commentary by ██████████s and these trees can be monitored for needlecast fungus as part of any future tree assessments.

Public Submission Extracts

APPLICANT RESPONSE

attack can be seen through the site. Once infected the decline in tree health is quick and death inevitable. As a group of trees assessed as poor quality.

20 Pinus ponderosa shown as High quality. Our assessment: As for Group 19.

The tree assessment notes the current stage and quality of Pinus ponderosa. We acknowledge the commentary by [REDACTED] and these trees can be monitored for needlecast fungus as part of any future tree assessments.

21 Quercus palustris shown as Poor quality. We agree with this classification.

Noted and no response required.

22 Pinus pinea shown as Exceptional. We agree with this classification.

Noted and no response required.

23 Quercus palustris. Outside the site. Shown as High quality.

Noted and no response required.

24 Pinus radiata. Outside the site. Shown as Weed species.

Noted and no response required.

In addition, we wish to make the following comments:

We acknowledge the commentary by [REDACTED] and these trees can be monitored and form part of any future tree assessment/s. The tree management approach to the site and principle of the landscape master plan is where feasible retain existing trees or replant new trees on site. This matter will be considered as part of any future detailed design for future stages of the project.

Between Tree Groups 5 and 6 there are trees of Eucalyptus grandis and Corymbia maculata. Our assessment: The trees are in good condition and with an anticipated life expectancy of 50+ years. Both species are outside their usual natural habitat, therefore somewhat unusual, but have adapted well to their position. They were probably planted by students and were used in 'tissue culture' experiments. Must be retained. Of high to very high value. Need to be well protected during development. Shown as Trees 317 and 318 respectively on Sheet 7 of the current edition of Westbourne Woods, a resource prepared by [REDACTED]

To the west of Tree Group 22 are three trees of Cupressus dupreziana, Saharan Cypress. Our assessment: This is an endangered species in its natural habitat and a rare and unusual tree in Canberra, but which have adapted well to this position. Of high to very high value. Need to be well protected during development. These trees pre-date the trees planted in the National Arboretum. The trees are shown as Tree 195 on Sheet 7 of the current edition of Westbourne Woods, a resource prepared by [REDACTED]

We acknowledge the commentary by [REDACTED] and these trees can be monitored and form part of any future tree assessment/s. The tree management approach to the site and principle of the landscape master plan is where feasible retain existing trees or replant new trees on site. This matter will be considered as part of any future detailed design for future stages of the project.

Our assessment of Tree Groups 1, 5, 9, 18, 19 and 20 differs greatly from that of Canopy tree experts.

We acknowledge the commentary by [REDACTED] and note the difference of opinion regarding Group 1. The comments will be considered as part of any future tree assessment and detailed design phase of the project.

The close planted Cedars within Group 1 are stagnating and have suffered over the years from their close planting, drought and lack of any management. Thinning, improved soil conditions and better husbandry will not lead to improved growth and thinning will contribute to trees falling over. While trees within the group may survive for many years they will not thrive and while they may be associated with the early days of the School or the early propagation and growing of this species they will not improve overall. In our opinion the retention of this sub-standard group will not add to the heritage of the site.

Public Submission Extracts

In our opinion Groups 5 and 9 have a strong association with the School and demonstrate one of the reasons for the very establishment of the School. They make a significant contribution to the heritage of the site. In our opinion the assessment by Canopy tree experts was done without the knowledge of their background and history. In our opinion both these Groups should be retained, protected and incorporated into the development.

In our opinion the tree within Group 18 should be assessed as poor quality. The trees seem to have been planted in a 'forestry plantation format' and then forgotten. The close planting has deformed the trees and, in our opinion, those within the group are at the end of their safe useful life. In our opinion the retention of this sub-standard group will not add to the heritage of the site.

The *Pinus ponderosa* within Groups 19 and 20 should be assessed as poor quality. The assessment of these trees by Canopy tree experts as being drought affected and dead wood present should more correctly be recorded as the effect of the needlecast fungus. It is this fungal infestation that has caused the large reduction in the number of this species over the last few years. The retention of the remaining trees within the groups will be counterproductive. We recommend these trees be removed.

The trees between Tree Groups 5 and 6 and the trees to the west of Tree Group 22 are historically significant trees on the site and have close links with the education of students at the School. These trees contribute significantly to the heritage of the site and in our opinion both these Groups should be retained, protected and incorporated into the development.

General Commentary

We are of the view that the proposed development provides the opportunity to revivify the landscape and set it up for the next 50 years and we support this concept.

Should the site works and redevelopment infrastructure allow for the retention of trees in other than the 'Excellent' or 'High' categories we would be supportive. However, some corrective and maintenance tree surgery should be undertaken to assist their incorporation into the development.

APPLICANT RESPONSE

We acknowledge the commentary by [REDACTED] and note the difference of opinion regarding Group 5 and 9. The comments will be considered as part of any future tree assessment and detailed design phase of the project. The tree management approach to the site and principle of the landscape master plan is where feasible retain existing trees or replant new trees. This matter will be considered as part of any future detailed design for future stages of the project.

We acknowledge the commentary by [REDACTED] and these trees can be monitored and form part of any future tree assessment/s. The tree management approach to the site and principle of the landscape master plan is where feasible retain existing trees, this matter will be considered as part of any future detailed design and tree assessment for future stages of the project.

The tree assessment notes the current health and quality of *Pinus ponderosa* within Groups 19 and 20. We acknowledge the commentary by [REDACTED] and these trees can be monitored for needlecast fungus and updated as part of any future tree assessments.

The tree management approach to the site and principle of the landscape master plan is where feasible retain existing trees, this matter will be considered as part of any future detailed design and tree assessment for future stages of the project.

We note and acknowledged [REDACTED] comments of support. As a key stakeholder for the duration of the project [REDACTED] has provided valuable input in the master plan and assessment trees, the Oakstand project team and GUNYAR Pty Limited are keen to revivify the landscape over the next 50 years which is supported by underlying principles of the tree management plan, landscape master plan and architectural master plan for the site.

The tree management approach to the site and a key principle of the landscape master plan is to where feasible retain and project existing trees. This matter will be considered as part of any future detailed design and tree assessment for future stages of the project.

Community Consultation

Contrary to the proponent's claim that there is overall support for the proposal, a survey in May/June 2021 of 266 Yarralumla residents representing 11.5% of the adult population of Yarralumla indicated that:

- 62% opposed any development, mainly on the grounds of preserving the existing heritage and the impact on traffic and parking
- apartments were the least favoured type of dwelling supported by only 16% of respondents
- 79% of respondents supported less than 100 dwellings.

The proponent notes that following the rejection of the original request to amend the National Capital Plan to permit dwellings and a hotel, the National Capital Authority advised the proponent that key stakeholders should again be consulted on the revised proposal.

There has not been any consultation with [redacted] on the revised proposal. Rather [redacted] and the other stakeholders were presented with a fait accompli at an online meeting in February 2022. The Revised Master Plan, which merely reduced the buildings in excess of 3 stories to 3 stories plus attic while increasing the height of all other building to 3 stories plus attic. There was no change in the number of dwellings or other spaces nor any change in the size of the built footprint or Gross Floor Area.

The community consultation completed by the [redacted] comprised of a one off online survey. The survey was not conducted in accordance with the best practice requirements of International Association for Public Participation (IAPR2) standards and the survey compromised of leading questions. Accordingly, the results of this resident survey are not considered reliable and should not be relied upon for determining the EPBC 2021-8937 proposed action.

In contrast, the Oakstand project team public consultation engagement program has been to take the time to develop a draft master plan with input from key stakeholders (which included [redacted]), prior to taking the draft to broader community consultation. The Oakstand project team developed the draft master plan through multiple workshops and roundtable discussions with key community stakeholders from July to October 2020.

The Oakstand project team then sought feedback from the broader Yarralumla and surrounding communities in November 2020, prior to refining and finalising the draft master plan. A total of three thousand one hundred and seventy-six (3,176) interactions occurred with those who participated in the consultation process from July to November 2020. Following feedback from the NCA and community the master plan was revised and an amendment to the National Capital Plan has been submitted separate to this EPBC 2021-8937 proposed action.

The Tania Parkes Consulting has led the Oakstand project team community consultation and engagement program since early 2020. Tania Parkes Consulting is accredited in the delivery of the best practice community consultation and engagement under the International Association for Public Participation (IAPR2) standards, and has conducted the community consultation and engagement program in accordance with and in excess of the prescribed public consultation requirement of the National Capital Authority. The EPBC 2021-8937 Preliminary documentation package is accompanied by numerous Forestry Place Consultation Reports and Summary Reports which document this approach and the results.

Heritage Plantings

As noted in the Commonwealth Heritage Listing (ID 105595) the precinct is important as a component of the arboretum and nursery landscape of Yarralumla.

The removal of so many trees from the site to accommodate the apartment blocks and access roads will have a significant impact on the heritage attributes and landscape values. In particular, the removal of Group 7 English Oaks and the partial removal of Group 1 Atlas Cedar will expose the apartment blocks to views from Banks Street across the Oval and compromise the sightlines.

The Heritage assessment acknowledges that the removal of part of Tree Group 1 to enable one of the apartment blocks to be built will have a moderate impact on an important heritage aspect of the site. A reduced number of apartments blocks would enable this group to be retained in its entirety.

As outlined previously, the goal of the Oakstand project team and GUNYAR Pty Limited has been to work with the natural landscape integrating with the site's topography. The revised master plan has been informed by a location and condition survey of all trees on the site, and incorporates landscaping that will respect the site's history and the significant trees. This work is reflected in the proposed landscape master plan, tree assessment report and Heritage Impact Assessments which all consider and assess how best to protect, manage and renew the sites trees and unique landscape character.

In addition, there has been close consultation with the [REDACTED] who advise that a program of tree renewal would be appropriate as many plantings require thinning and are reaching end of life. They have generously offered to advise the project's landscape architect on appropriate tree species as the project progresses. Moreover, the Heritage Impact Assessment prepared by ERM support the revised master plan and proposed tree retention/removal program. It is also noted that no trees are proposed to be removed as part of the EPBC 2021-8937 proposed actions and additional detailed site planning, heritage and tree assessments would occur as part of any future redevelopment. This work would form part of Works Approval applications submitted to the NCA for assessment and determination. Any such work would be required to have regard to and abide by the detailed assessments included in the HIA by ERM.

Many trees are scheduled to be removed because they are inconvenient and to make way for residential apartments. These include individual and groups of Monterey Pines, Kurrajongs, Pin Oaks, Stone Pines, She Oaks, English Oaks. The removal of each of these trees or groups of trees when looked at as single actions is viewed by the proponent as not having a major impact on the heritage or landscape values of the site. However, when viewed in totality, the heritage values of the site will be eradicated completely.

The tree assessment makes the point that many of the trees are in medium to poor condition to justify their removal. YRA notes that the survey was conducted in May 2020 after a long drought. Since that time there has been substantial rainfall and many of the trees assessed as medium or poor quality have since revived. YRA considers that a new assessment should be conducted.

The goal of the Oakstand project team and GUNYAR Pty Limited has been to work with the natural landscape integrating with the site's topography. The revised master plan has been informed by a location and condition survey of all trees on the site, and incorporates landscaping that will respect the site's history and the significant trees. This work is reflected in the proposed landscape master plan, tree assessment report and Heritage Impact Assessments which all consider and assess how best to protect, manage and renew the sites trees and unique landscape character.

Any future detailed design works forming part of Works Approval applications will be accompanied by new tree and heritage assessments.

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The proponent claims there is a plan to maintain and renew the heritage buildings and significant treescape into the future. Such a plan has never been made public and should be examined as part of the assessment under the EPBC Act to ensure the buildings, tree plantings, tree replacements GSM habitats and other heritage features are properly managed, fully funded with clear lines of responsibility and accountability for a specified timeframe into the foreseeable future. YRA considers any approval should have conditions attached addressing such ongoing management arrangements.

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As indicated previously is in this document the proponent has commissioned a number of Heritage Impact Assessment and Studies. The HIS and studies outlined a how heritage buildings and significant treescape can be protected into the future.

New Building Footprint

The Heritage Assessment Report (June 2020) claims all new apartments and the aged care facility will be built on the site of previous buildings. Unfortunately, this is not the case, and the new footprint is considerably larger. This is clearly shown on the Existing and Proposed Buildings overlay included in the NCP Amendment Application dated March 2021. It is especially problematic in the North West corner, the West and South East of the site. As the Heritage Impact Assessment (March 2021 p 76) notes:

“The proposed action will increase the current Site’s built footprint and alter its forestry research setting, which in itself poses a severe risk of significant impact to the Site’s identified heritage values.”

The Gross Floor Area is estimated to increase from the current figure of 11021m² to between 48000 and 55000m² – an increase of 5-fold. The new buildings also cover a much greater area than the existing built footprint. This, in turn, will significantly reduce the current parklike setting which is one of the attributes of the CHL and which the EPBC Act is designed to protect. A reduction in the scale of the development would reduce the extent of the loss. The proponent claims that 60% of the site will remain undeveloped. It is not clear how this figure is calculated and whether it includes non-permeable surfaces such as roads, parking or other infrastructure. YRA considers this claim should be examined as part of the EPBC assessment.

The goal of the Oakstand project team and GUNYAR Pty Limited has been to work with the natural landscape integrating with the site’s topography. The revised master plan has been informed by a location and condition survey of all trees on the site, and incorporates landscaping that will respect the site’s history and the significant trees. This work is reflected in the proposed landscape master plan, tree assessment report and Heritage Impact Assessments which all consider and assess how best to protect, manage and renew the sites trees and unique landscape character.

In addition, there has been close consultation with the Institute of Foresters and Friends of ACT Trees who advise that a program of tree renewal would be appropriate as many plantings require thinning and are reaching end of life. They have generously offered to advise the project’s landscape architect on appropriate tree species as the project progresses. Moreover, the Heritage Impact Assessment prepared by ERM support the revised master plan and proposed tree retention/removal program. It is also noted that no trees are proposed to be removed as part of the EPBC 2021-8937 proposed actions and additional detailed site planning, heritage and tree assessments would occur as part of any future redevelopment.

Heritage Buildings

The Heritage Impact Assessment (March 2021) notes that the cumulative loss of so many buildings on the site will result in a significant impact to the site’s overall CHL values. In particular, the total removal of the Caretaker’s Cottage is considered to have a severe impact on the site’s overall CHL values. In particular, the removal will result in the historic and aesthetic CHL values being degraded.

YRA considers that there is an opportunity to re-examine the scale and mix of the proposed development to preserve more of the existing buildings including the Caretaker’s Cottage.

The HIA identifies a number of buildings with heritage values as either high or moderate significance, which includes the Australian Forestry School, the former Museum, Store, Tennis Courts and Forestry House. The revised master plan indicates that these buildings will be retained, protected and adaptively reused in a manner which retains and protects their heritage values. These buildings and structures represent important phases in the site’s history and their conservation will allow for the values and history of the site to be preserved within the context of the forestry school.

To conserve the heritage values of the Site a number of heritage strategies have been incorporated into the urban design report and master plan prepared by Kann Finch and Oxigen. These strategies are briefly summarised below and can be reviewed in detail within the HIA.

- Strategy 1: Heritage Advisory Role - Recommendation to engage an appropriately qualified heritage consultant or heritage architect as an 'on-call' ad-hoc Heritage Advisor for the detailed design and development phases of the proposed action.
- Strategy 2: Conservation Management Plan (CMP) - Recommendation to prepare a CMP for the whole Site with particular emphasis on buildings 9, 10, 17 and 30 prior to the adaptive reuse of these buildings.
- Strategy 3: Interpretation - Recommendation is to develop a whole-of-site Interpretation Plan that considers the feasibility of the interpretive measures above, as well as design, audience and implementation.
- Strategy 4: Construction of Glasshouse - Recommendation to reconstruct a Glasshouse of similar design in an appropriate location within the Site to be used for integration into shared gardening program or other identified resident or community use.
- Strategy 5: Tree Retention - Recommendation to retain as many groups of singular species as possible. Where removal of these groups is necessary, retain the healthiest trees and replant the species in a similar pattern.
- Strategy 6: Replacement Program - Any future replanting programs should prioritise individual species and groups of species that are proposed for removal and planted in a way that demonstrates the history of tree propagation and research at the Site.
- Strategy 7: Photographic Recording - Recommendation to prepare photographic recordings of all buildings prior to their demolition, and the treescape prior to tree removal.

The above outlined strategy or strategies could form part of EPBC Act determination and are considered to address the matters raised in submissions.

Golden Sun Moth

As the Golden Sun Moth survey found, the site contains some 1.6ha (or 14.6% of the total site) of potential GSM habitat of which 0.56ha (or 5.1%) is confirmed habitat. Although the southern habitat is described as low-quality grassland containing the likes of Chilean Needle Grass, it has been observed from surveys on Dudley Street that GSM thrive in Chilean Needle Grass. On the

An Ecological Values and Constraints Assessment (**EVCA**) and Targeted Gold Sun Moth Survey (**TGSMS**) have been completed and accompany EPBC 2021-8937 proposed action. The EVCA and TGSMS assert that the study area (comprising of the site) climax vegetation communities have been highly degraded by the land

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other hand, the northern patch contains a ground storey of native grass. The Master Plan proposes to build an apartment block on this patch. With suitable management of their habitat there is the opportunity for the GSM population to thrive. But not if an apartment block is built on top of them. YRA notes there is no mitigation strategy planned, nor any translocation or offsets.

Previous Environmental History

The proponent (Gunyar) has provided a letter stating an unblemished environmental history. To our knowledge Gunyar have not been involved in any previous development. In assessing the proposed action, consideration should be given to assessing the environmental history of all associated parties including [REDACTED]

Financial Considerations

The proponent claims the proposed scale of development is necessary to enable the Shepherd Foundation (a Registered Charity) to maintain and renew the heritage buildings and significant treescape into the future and pay the 75% lease variation charge to the Commonwealth. The financial return of the developer does not appear to be one of the criteria in assessing impacts under the EPBC Act.

There are many alternative scenarios that would result in less environmental and heritage destruction that do not appear to have been considered eg repurpose Forestry House and/or Divisional HQ for aged care and/or offices, repurpose Forestry House into the aged care facility rather than a hotel. A smaller number of dwellings could also still be financially viable and provide funding for conservation and preservation of the natural and built environment.

[REDACTED] notes that as part of the discussions with the NCA following the rejection of the original Master Plan, NCA explained that part of the intent in limiting height was to reduce the number of dwellings. This intention has been disregarded in the revised Master Plan. [REDACTED] considers that the claim that proposed development is the only financially viable option, should be examined as part of the assessment to see to what extent it is valid and what alternative financial models are available that could result in less destruction of the protected heritage values of the site.

Social Impact

Traffic

The Revised Master Plan Consultation report acknowledges that there will be an extra 200 vehicle trips each hour during the morning and afternoon peaks and 2000 vehicle movements per day generated by the development but downplays the impact of the additional traffic using a fundamentally flawed analysis.

The analysis assumes that the CSIRO site is fully occupied, plus is occupied by an additional 10,000m² (thereby almost doubling the size of the occupied site) and that this is similar to the

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use history and urban development in the Yarralumla area. Therefore, the study area (site) now contains primarily planted exotic vegetation. Accordingly, the EVCA and TGSMS addresses the requirements of the EBPC Act.

The proponent has provided all required environmental history information as outlined by DCCEEW and detailed under the provisions of the EPBC Act.

Financial considerations are not relevant to the EBPC assessment and a response to this item of the submission is not considered necessary.

A Transport Impact Assessment (TIA) was undertaken by Stantec (formerly GTA Consultants). The TIA provides an extensive analysis of the site and proposed/revised master plan. The purpose of the TIA is detailed below:

- Existing traffic and parking conditions surrounding the site as well as current projects in the area.
- The adequacy of existing public transport services.

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amount of traffic that will be generated by the proposed development. Consequently, there will be little net increase in the volume of traffic and little impact on the congestion in surrounding roads. In addition, the upgrade to the Kent/Novar intersections will ameliorate any problems.

In reality, the site is vacant and has been for a number of years. Even when it was occupied at its maximum it had only 128 staff. The proposed development is likely to have 950 people plus delivery and service vehicles in addition to residents, hotel guests, staff and visitors. The TCCS traffic modelling for the Kent/Novar intersections makes no allowance for the proposed development.

As part of the EPBC assessment an examination the proponent's traffic modelling should be undertaken and TCCS consulted.

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- The suitability of the proposed parking arrangements.
- Trip generating characteristics of the proposal.
- Suitability of future transport access arrangements for the proposal.
- Transport impact of the proposal on the surrounding road network.

The TIA references and has regard to a variety of policies detailed by the NCA, ACT Government (including Transport Canberra and City Services) and a number of Australian Standards. Furthermore, the TIA provides a detailed traffic impact analysis of the surrounding road network and key intersections. The traffic impact analysis has had regard to the proposed quantum of land uses proposed in the master plan. The key matters extracted from the TIA conclusion are summarised detailed below:

- The masterplan could potentially generate 220 and 227 vehicle trips during the weekday AM and PM peak periods, resulting in a net increase of around 80 to 120 vehicle trips in any peak hour compared to the full development of scientific research floor space currently permissible on site.
- The territory government have allocated funding to an upgrade of the Adelaide Avenue interchange with Novar and Kent Street in Yarralumla, including signalisation of the three priority-controlled intersections. Work on one of these intersections has commenced.
- The operating performance of the road network post development of the masterplan is consistent with road network performance given full development permissible under the existing lease agreement, with average increase to delays of one second and average increase in Degree of Saturation of 0.03.
- The development has been designed to ensure a high level of pedestrian permeability and movement with provision of (amongst other things) a new shared bicycle and pedestrian path proposed along the western side of Banks Street between its intersection with Bentham Street and Brown Street. If approved these facilities will improve connectivity and accessibility to the lake and foreshore bicycle and walking tracks, as well as provide publicly accessible pedestrian paths through the site.
- The access roads, including Wilf Crane Crescent and the aged care access, are expected to operate within acceptable operating parameters.
- Final car parking numbers for the project are expected to be determined at works approval stage of any future development. Notwithstanding, the

current master plan can provide parking consistent with the Territory Plan Parking and Vehicular Access General Code expectations.

- The proposed parking layout and loading areas will be progressed during the works approval stage of any future development to be consistent with the dimensional requirements as set out in Australian/New Zealand Standard for Off Street Car Parking (AS/NZS2890.1:2004, AS/NZS2890.2:2018 and AS/NZS2890.6:2009).

In addition, to the detailed TIA the Oakstand project team has engaged with ACT Transport Canberra and City Services who has accepted the modelling which has been based upon the TCCS model and incorporates the Brickworks and Forestry Place traffic generation upon completion. Included in their considerations is that the CSIRO lease allowed for a further 10,000 square metres of GFA, which if it had been realised, would have increased traffic flow to a similar level as the proposed development.

Loss of amenity

The target residential profile includes families looking for larger 2-3 bedroom apartments. Such families are likely to include children. The target profile also includes Yarralumla residents looking to downsize. As the proponent notes, their homes are likely to be purchased by new families moving into the suburb. Such families will also have children further exacerbating the pressure on local infrastructure such as the local primary school, and medical facilities.

When combined with the Brickworks development Yarralumla's population is likely to increase from some 3000 to 5000 people, further adding to the pressure on infrastructure and loss of amenity. A smaller development will alleviate such pressures.

The proposed action will not result in a loss of amenity to residents within Yarralumla. Conversely, it is noted that a significant site currently sits unutilised within a highly accessible and central part of Canberra. The proposal will activate the site in a manner which respects its environmental, historical and heritage importance while providing a cohesive response to the surrounding locality and significant benefits to Canberra.

The proposed development is consistent with the broad principles of the National Capital Plan which seeks to activate residential developments on accessible land in urban locations and is consistent with the ACT Planning Strategy which seeks to provide 70% of all future development in urban areas by 2050.

The IFA/AFG contends that the national heritage significance of the site is due to its role in Australian and regional forestry research and education for most of the 20th Century, and that this significance is reflected in the landscape character of the site as well as in its heritage-listed buildings. Specifically:

- its significance for forestry research derives from the site initially being part of Westbourne Woods, a large arboretum established between 1914 – 1924 by Charles Weston to test trees suitable for realising the Griffins' vision for Canberra as a city in a forest; and subsequently (1930 – 2008) as a national centre for forestry research (initially in the form of the

The proponent acknowledges the commentary by the Institute of [REDACTED] and ongoing interest in the detailed assessment undertaken of trees within the site. The proponent is appreciative of the collaborative manner [REDACTED] has worked with the project landscape architects, heritage consultant and architects. The proponent welcomes the opportunity to work with [REDACTED] on the next stages of the project where additional consideration of trees will be completed as part of the detailed design phase of the project, in the event EPBC and NCA approvals are secured.

Commonwealth Forestry and Timber Bureau; and then as CSIRO Division of Forest Research);

- its significance for forestry education derives from the site being the location of the Australian Forestry School (1926 – 1965). The School was deliberately established within Westbourne Woods to allow students easy access to field-based learning in the arboretum, as well as the judgement that such an environment was an appropriate location for the national centre of forestry education and research in the new national capital.

We contend that any development of the site should respect both the landscape character, defined primarily by the arboretum plantings of tall forest trees, and the heritage buildings themselves. In relation to the latter, we welcome the prospect of appropriate adaptive reuse of those buildings that respects and maintains their heritage values, which have been well documented in, for example, the CSIRO Yarralumla Heritage Management Plan 2018.

In relation to the landscape character, we advocate an overall plan of management for the site that would see groups of trees that are unhealthy or at the end of their safe life replaced by new plantings of tall forest tree species, noting that these species or provenances may not be identical to those originally established. As you would be aware, the projections for Canberra's climate over the next century are for hotter and drier conditions with a greater range and number of extreme events. You would also be aware of preliminary work undertaken for the ACT Government on what this might mean for tree species suited to Canberra's urban environment.

We suggest that the forestry research and education heritage of the AFS site could be respected, and the landscape character of the site maintained, by applying the concept of adaptive reuse also to the arboretum plantings, so that they continue to establish and showcase trees assessed to be likely to be well-adapted to Canberra's changing environment over the second century of non-Indigenous use of the site. Maintaining this landscape character would require retaining a sufficient number of groups of trees across the site as a whole, and organising the program of management and replacement to ensure that removals and replanting were scheduled to minimise the impact on the landscape character as a whole. The heritage and educational values of the site could be further enhanced by strengthening the interpretation material onsite and digitally. The IFA/AFG would be pleased to assist in any such work.

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.

The HIA provides a number of strategies that could be adopted to retain and protect the sites landscape character this includes the potential for a overall plan of management.

The proponent supports the protection of the forestry research and education heritage by protecting significant individual and groups of trees. As indicated above an overall plan of management is considered in the HIA. The Oakstand project are committed to ongoing key stakeholder engagement which includes the [REDACTED].

The master plan has considered retention of significant trees on the site as well as the future renewal of trees reaching or past their effective lives. Tree removal will be subject to a future application and the applicant looks forward to the continuing engagement with the [REDACTED] and [REDACTED] to finalise a tree removal, renewal and replacement plan that will include the selection of species appropriate for the site and local climate.

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The applicant would welcome the involvement of [REDACTED] in the documentation and preparation of interpretive heritage materials to be incorporated into any future development. Finally, the master plan has been crafted to provide 60% open space to maintain the landscape character of the site and the height controls will ensure the perseverance of a treed canopy backdrop preserving the arboretum character of the site.

While the development acknowledges the heritage buildings and the landscape and has endeavoured to respect them, the issues that are not clear and need further expansion are:

- Proposed use of the heritage buildings and the impacts of that use;
- Parking associated with the use of the heritage buildings is not defined; and
- The heritage plantings which cover most of the site will be reduced in size and will have some impact.

The following responses are provided to the [REDACTED] comments:

- The proposed use of the heritage buildings has been indicated as Hotel and office uses. These uses have been identified as the most suitable uses due to the appropriateness of the uses relevant to the significance of the building interiors and relationship to the historical use of Forestry House for accommodation purposes. The uses have been supported by ERM and will be subject to detailed assessments at any future works approval stage.
- Parking associated with the heritage buildings is as per existing and will be detailed in any future works approval application forming part of more detailed design phases for the project.
- Heritage plantings have been assessed in the Heritage Impact Statement and their retention incorporated into the master plan and recommendations within the HIS.

We note and support the height well below the tree canopy and trust that the images are a correct representation.

Noted and appreciate the support from the [REDACTED] regarding building heights within the master plan.

We also note the relatively open development.

Noted and appreciate the support from the [REDACTED] regarding the master plans approach to providing a open development outcome which retains the landscape significance and character of the site.

It could appear that parking for the new building is at ground level or basement. Basement excavation may impact on ground water levels and affect adjacent landscapes. It is unclear if this has been considered.

Car parking associated for new buildings is envisaged to be primarily contained within basement levels. Limited surface level car parking may be provided however will be designed so as not to affect the landscape character nor impact significant trees within the site.

4 CONCLUSION

The document has been prepared following the completion of the public exhibition period for Preliminary Documentation Package for EPBC 2021-8937 Forestry Place CSIRO Block 7 Section 3 Yarralumla exhibited from 7 December to 21 December 2022. During the exhibition period a total of four (4) submissions were received, including:

[REDACTED]

The Oakstand project team welcome the submissions and note that many of these stakeholder groups have been regularly consulted and engaged with for the duration of the project. This includes the revised master plan which was taken to key stakeholder consultation in February and March 2022.

A review of the [REDACTED] submissions indicates that the stakeholder commentary does not object to the proposed action nor the revised master plan. Rather the submissions provide commentary and observations on the revised master plan, specialist reports and studies, along with reaffirming the need to preserve heritage buildings, significant trees and the unique landscape character of the site. While the submission from the [REDACTED] objects to the revised master plan and proposed action.

This document has been prepared in accordance with the requirements of section 95B Procedure after end of period for comment of the EPBC Act and is provided to the DCCEEW and Minister for determination of EPBC 2021-8937 Forestry Place CSIRO Block 7 Section 3 Yarralumla.

The responses to the public exhibition submissions contained in this document concludes that the comprehensive Preliminary Documentation Package and proposed action under EPBC 2021-8937 are acceptable and warrants approval by DCCEEW and the Minister under the provision of the EPBC Act.

