



Yarralumla Residents Association

Submission

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1. Summary

This is a submission in response to the EPSDD proposal for the North Curtin Horse Paddocks.

The proposed development strategy document (released in April 2024) is very limited in detail and provides only a small-scale plan of the site. The nature of the proposed development is an outline of the layout superimposed on an aerial photograph of the area. The short period to make submissions closes on 18 June 2024.

This submission is informed by consultation with the Yarralumla and Deakin communities and the Inner South Canberra Community Council (ISCCC).

This submission demonstrates that the proposed development strategy and preferred options comprehensively fails to fulfil its own objectives and claims. There are significant issues associated with the proposed development strategy. The need for a development of this scale and density is highly questionable. Its economic, social and environmental impact on the community has not been considered.

The constraints of the proposed development site have not been addressed in terms of: roads and civil infrastructure, traffic congestion, a potential population of 70,000 for Molonglo mainly accessed from/to Adelaide Ave and Cotter Road, a major new intersection on a significant Adelaide Avenue off ramp, connectivity to Woden and neighbouring suburbs and the West Deakin Employment zone, inter-town centre buffer zones and connected open green space, bushfire protection, flood zone mitigation, public transport, and lack of community facilities. The proposed Development proposal appears to have been rushed.

The overall cost of the proposed development/infrastructure will eventually be far more than the money gained from land sales revenue and this will place an additional cost burden on Canberra's already overburdened ratepayers.

Scale and Scope of Development

Minister Steel's proposed development of 1300 townhouses and apartments is for urban 'infill' of a type and scale that is without precedent for a Canberra suburb. It is not infill of a couple of blocks but of 13 ha on the edge of a proposed major diplomatic zone (with a major road providing access to the estate being inside the diplomatic zone and with one access road into the development).

The dwelling density of the proposed development is nearly 20 times that of Curtin and is predominantly high density, with most of the dwellings proposed being 6 to 9 storeys. There is nothing this high in the Woden Valley anywhere north of the Woden Town Centre. In fact, some of the proposed 6/9 storey buildings will tower over the processional route to the Governor General's residence and provide prime dominant views to the Governor General's residence, the Lodge and Parliament House. This will also provide a prime "snipers' alley" view to some of Australia's most important institutions.

The proposed development is of the scale of the developments in the town centre such as Woden or Belconnen, but with none of their services or amenities being part of the development. There is a stark contrast in scale, dwelling height, dwelling mix, net dwelling density and population per hectare with the existing neighbouring suburbs of Curtin, Deakin,

Hughes or Yarralumla. The density of dwellings is disproportionate and at odds with the built character of the surrounding area. Thus, any goal of integration with existing suburbs cannot be achieved under this proposed development.

Roads, Civil Infrastructure, Traffic and Transport

There is a need for very significant investment in roads, infrastructure and services within and adjacent to the proposed development. A comprehensive assessment of these requirements is lacking, and the costs estimates, where and when available are generally underestimated, as all the relevant factors are never taken into account. There is an urgent requirement to roll out the Mint Interchange as a priority, given the current congestion in the area let alone proposed North Curtin Development and ongoing development of the Molonglo Valley.

The proposed development only makes provision for roads within the developed area and the impact and costs of these and other roads are always severely underestimated. There is no provision for the upgrade of any connecting roads or the intersections to major routes. The forecast increase in population of up to 2500 and at least 1500 cars, from the proposed development, will bring a significant increase in traffic congestion, commuter 'rat running' through the neighbouring suburbs from the Adelaide Avenue corridor through to car and pedestrian safety issues.

Clearly, without investment in the surrounding roads, and the rollout of the Mint Interchange, the existing road network will be overwhelmed. Access to the main roads will be grid locked, impacting on commuters with major 'rat running' through neighbouring suburbs. The traffic interface with the proposed development will be unsustainable.

The proposed development is not viable without major investment in road upgrades. The construction of the Mint Interchange for Adelaide Avenue and Cotter Road, at a cost of more than \$100m, is essential.

No consideration is given to how an additional population of 2500 will be able to access and park at the closest shops (Yarralumla or Curtin). Without adequate provision of retail and community facilities close to the proposed development there will be significant access and traffic safety issues, traversing major roads to get to the Yarralumla and Curtin local centres. The local Yarralumla Centre (Bentham St Shops) has one small supermarket and parking for 46 cars. According to the ACT Government Territory and Municipal Services report in 2014, the existing parking does not meet Australian Standards and has a high accident rate, including involving pedestrians. In the last 10 years the situation has deteriorated even further.

The proposed development promises, but fails to deliver, easy access to public transport. There can be no bus service to anywhere but the periphery of the estate and even if the tram were to be built, it is about a decade away and an extra tram station on the route to and from Woden to Civic would mean another tram station would need to be built to service the estate. The time taken for the tram to go from Woden to Civic would increase as a consequence. Substantial operational and safety risks would exist if an Adelaide Avenue bus stop was built. This would include the high risk of stopping buses adjacent to high-speed traffic lanes.

The closest proposed tram stop is at Kent St, for pedestrians this close to a 2km walk Access for the elderly and the disabled is questionable and heavy patronage of a tram service when, or if, it becomes available seems unlikely.

The proposed development appears based on the assumption that the existing infrastructure, services (roads, electricity, water, stormwater, sewerage and telecommunications) are adequate to accommodate the connection of 1300 new dwellings. There is no provision for new infrastructure or upgrades within or adjacent to the site and no provision is made for the required Asset Protection Zones for bushfire protection. This is likely to impact on the design layout and number of dwellings. The need for these upgrades must be considered and will add significant cost to the proposed development and could make it financially unviable.

Storm water requirements have not been comprehensively assessed. The rigid grid design of the proposal provides little scope for directing stormwater into appropriate flow paths. The stormwater detention volume estimate needs to meet Australian Standards (AS/NZS 3500.3). When this is done the runoff volume nearly doubles. Also no open areas have been set aside for the necessary retention ponds in the layout of the blocks.

The nearby existing Yarralumla/Curtin sewerage infrastructure was built in the 1940s, 1950's and 1960's, previous studies and advice from ICON water suggest that existing sewer and water infrastructure is incapable of handling the demands of a development any greater than 25 dwellings. To upgrade the main sewers/storm water for 1300 extra residences would require digging new lines and increasing through put volumes substantially. This has also not been assessed or costed.

Community and Environmental Impacts

There are no new community facilities proposed to service the proposed development – no schools, limited community and open spaces to service the new high-rise housing.

The proposed development provides one small park on the southern end of the plan and several small, disconnected parks of about 4ha in total that are designed solely for passive recreation. The high-density housing development removes 13 ha of urban open space. Overall, this is a significant loss of open green space and recreation amenity.

The proposed development also builds over Griffin's green buffer between central Canberra and the satellite towns of Woden, Weston Creek and Belconnen. Building out this buffer severely compromises city planning principles.

The scale and density of the proposed development maximizes the dwellings per hectare at a level that is unprecedented for urban infill for Canberra. A case for this scale and density of development is not made.

The proposed development does not take into account the social, economic and environmental impact on the community. The community will be subject to traffic, heavy construction haulage, and fit-out traffic for the entire construction period.

A comprehensive analysis must be undertaken of the area and the issues identified. The need to be transparent must be addressed. These issues include the scale and scope, impacts on traffic, the community, heritage and environment and the overall cost, feasibility and viability.