

DA 202443505-S179B-16 Bentham Street (Section 56 Block 22 Yarralumla)
Yarralumla Residents Association Submission

Note: All references to Figures are hyperlinked to the relevant figure

The Yarralumla Residents Association, with over 240 members, does not support the proposed development.

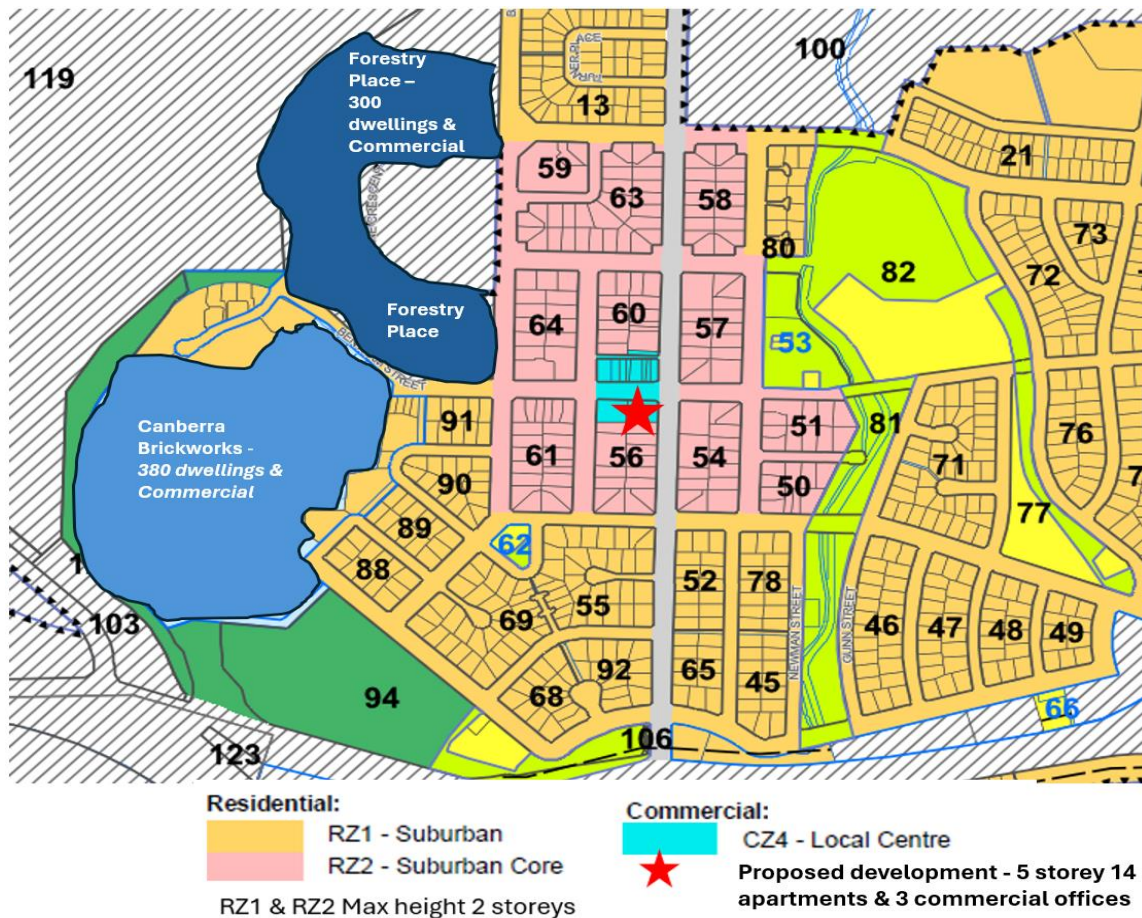
Overview

The Yarralumla Business and Shopping Centre is designated a Local Centre Zoned CZ4 that specifies a maximum of 2 storeys.

The proposed 5 storey development replaces the existing 2 storey building with a GFA 850m² for office/professional suites and consulting rooms. The proposed building has less than half the office space of the current building, located on the ground floor with GFA 402m². This is topped by 4 storeys of 14 spacious 3 and 4 bedroom luxury apartments with gold level liveability standards and lounge and indoor pool/spa/sauna facilities (National Capital Design Review Panel advice).

Given the massive infill of Yarralumla of 680 dwellings and commercial premises, currently underway within 200m of the proposed development site, **breaching the requirements for 2 storeys** and the loss of commercial office space from the business centre **cannot be justified**.

Figure 1 – Proposed Development in Yarralumla & Zoning & developments in progress of 680 dwellings



Stage 2 notification – S179B Amendments

The Amendments to DA 202443505 are stated as including: revisions to the traffic impact assessment report, five visitor parking spaces added to the basement, safety measures for basement movements, alterations to waste collection arrangements, removal of restaurant/café uses on the ground floor, provision of shadow diagrams, amendments to proposed planting to increase native species and inclusion of a Commercial Needs Assessment.

None of the DA Amendments effectively address the significant issues and problems with the original DA 202443505 for the proposed development. These issues and problems are detailed below.

1. Scale of development

The scale of the proposed development is without justification; it will have a significant impact on the community, amenity and character of the suburb, it is not in keeping with local context; it does not meet the CZ4 Zone requirements for height; ; it will significantly reduce the business capacity of the centre by removing half the office space; and it far exceeds the capacity of the site (Section 56 Block 22 Yarralumla) to accommodate the proposed development without compromising planning and building regulations and policies. This is particularly the case with:

1. the 5-storey height in a 2 storey CZ4 zone at a “Local Centre” that lacks any justification
2. commercial floor space reduced below the 50% mandatory requirement from existing area – which is non-compliant
3. impractical and unsafe commercial waste management and collection that is non-compliant
4. Utilising the neighbour’s property nature strip for residential waste collection of 17 bins breaches regulatory requirements; does NOT provide space for the neighbour’s own bins; and is non-compliant
5. no ability to store demolition and construction materials on site as 95% of site is subject to deep excavation – major impact on the centre during construction taking up existing parking places and nature strips
6. no ability for trades and deliveries to park during construction without taking away parking from the business and shopping centre users and/or blocking Bentham Street - parking at the shops is already at/over capacity

A development of this scale should not be approved under the current planning framework.

2. No justification for 5-storey height in a 2 storey CZ4 zone at a “Local Centre” - non compliant (Figure 1 & Figure 2)

The proposed development does not meet the requirement of Commercial Zones Policy EO2 – CZ4 Local Centre Zone nor the requirement of ZS2 – Commercial Zones Specifications - Assessment Outcome 14 on Built Form and Design

Commercial Zones Policy EO2 – CZ4 Local Centre Zone

Assessment outcomes – Commercial Zones Site and Land Use (Nos. 5 and 6)

5. *The proposed use and scale of development are appropriate to the site and zone. This includes consideration of appropriate shop sizes in different commercial centres.*
6. *Adverse impacts of development on surrounding uses (both within a site and on adjoining sites) is minimised and residential amenity protected. This includes between residential uses and between non-residential and residential uses.*

ZS2 – Commercial Zones Specifications - Assessment Outcome 13 Built Form and Design

The height, bulk and scale of the development is appropriate, noting the desired zone policy outcomes and the streetscape. This includes building envelope and setbacks.

13.1 Building heights are a maximum of: (b) in CZ4 Zone 2 storeys

2.1 National Capital Design Review Panel

The National Capital Design Review Panel stated in its report of 5 October 2023 (Page4) that:

“the proponent is encouraged by the Panel to provide further justification to the overall building height once further analysis of solar amenity and servicing requirements for each level is validated”.

No further justification has been provided by the proponent. See also *Planning Act 2023 s186*.

The primary justification put forward by the proponent to date is that:

“The proposal provides an alternate typology of living in Yarralumla specifically designed for local downsizers.” and “to provide larger apartments which are not readily available in the market, which are adaptable and allow ageing in place”. **This justification is not valid.**

Massive urban infill is already underway in Yarralumla within 200m of the DA site at the Canberra Brickworks and Forestry Place. This infill of 680 dwellings provides a large range of spacious and luxury apartments suitable for aging in place and independent living. **This will saturate the market, so providing a further 14 luxury apartments in the proposed 5 storey building is thus unwarranted and unnecessary and reduces the commercial capacity of the Local Centre.**

2.2 Planning Act 2023 s186(g)

In particular the *Planning Act 2023*, PART 7.6 Development approval Division 7.6.1 s186 (g) requires that when deciding development applications the decision maker must consider the following:

“(g) the interaction of the proposed development with any other adjoining or adjacent development proposals for which a development application has been submitted or development approval given;”

The Canberra Brickworks DAs were approved in 2023 - DA 202341982 and DA 202342069 and for Forestry Place the National Capital Plan Amendment (No. 97 – Block 7 Section 4 Yarralumla (former Australian Forestry School)) Amending Instrument 2024 of 18 March 2024.

The DA 202443505-S179B 16 Bentham Street provides absolutely no information on the relationship to, and impact of, these adjacent major developments that are in progress.

2.3 Restaurant Use

The original DA 202443505 for the proposed development sought a change of permitted uses under the lease to include “ground floor commercial (including restaurant)”. Restaurant was also used to justify the scale of the development: “change of use from office to retail / restaurant will likely facilitate a higher occupancy than the existing office usage and “to enliven the local centre with north facing restaurant and a small amount of north facing residential use”.

This justification does not withstand scrutiny, as the Yarralumla Shopping Centre already has 9 restaurants and cafes and a supermarket that’s sells cooked meals.

More importantly the **DA Amendments S179-B no longer has Restaurants as a use** only Office use is stated, **thereby removing this justification** for the development. **The Lease purpose clause must therefore ensure that retail, restaurants/cafes and professional suites are not permissible** – only office use.

3. Commercial office floor space reduced below the 50% mandatory requirement from existing area – non compliant

The proposed development does not meet the Commercial Zones Policy – Assessment Requirements - Residential use – CZ4

Commercial Zones Policy – Assessment Requirements - Residential use – CZ4

Development proposals are required to meet all relevant assessment requirements – these are mandatory development controls.

Residential use – CZ4 – Requirement 5.

“Where residential development is proposed, the total GFA for commercial and/or retail purposes on the site cannot be reduced by more than 50% unless it is demonstrated to the satisfaction of the Territory Planning Authority: a) the whole centre is currently not commercially viable; or b) the centre will remain commercially viable after the proposed development.

Compliance with this requirement is demonstrated by a retail and commercial needs assessment prepared by a suitably qualified person.”

The justification by the proponent for not meeting this requirement was that

“The proposed redevelopment has a commercial GFA of around 405sqm which is a reduction of greater than 50% (noting only slightly greater than 50%). Whilst commercial GFA is reduced, the use change of use from office to retail / restaurant will likely facilitate a higher occupancy than the existing office usage, and provide Yarralumla with much needed northern active frontage within the local centre, contributing to increased daytime usage.

The justification is no longer valid as Restaurant use is now not included under the Amendments only “Office use” is included. The proposed reduction of the office space to less than half will have a negative impact on the commercial nature of the Local Centre. Thus **the reduction below 50% is non-compliant and should not be allowed.**

4. Waste Management – non compliant (Figure 3, Figure 4, Figure 5 & Figure 6)

The DA remains non-compliant, for both Residential and Commercial Waste collection, under the ZS2 – Commercial Zones Specifications Assessment Outcome 27, and the *Development Control Code for Best Practice Waste Management in the ACT 2019 (DCCBPWM 2019)* (see 1,2,3, 5,6, 8, and 10 below)

ZS2 – Commercial Zones Specifications Assessment Outcome 27

Waste is appropriately managed on site without having a detrimental impact on residents and surrounding areas.

Development Control Code for Best Practice Waste Management in the ACT 2019

Part 3 Mandatory requirements – residential developments

3.5 MGBs allocated to each individual dwelling and kerbside collection – multi-unit residential developments Table 3.3 - Number.2.4

Development Control Code for Best Practice Waste Management in the ACT 2019 PART 7.4

7.4 Designated collection points

Designated collection points must not be located:

- 1. near intersections*
- 2. near roundabouts or slow points*
- 3. along busy arterial roads*
- 4. in narrow lanes*
- 5. near possible obstructions, including trees, overhanging buildings, and overhead powerlines*
- 6. where they pose a traffic hazard*
- 7. adjacent to steeply sloping ground that has no barriers*
- 8. across pedestrian pathways*
- 9. external to the grounds of the facility (except for kerbside collection) or*
- 10. where collections may impede vehicle or pedestrian access or egress to underground or surface car parks.*

4.1 Residential Waste - detrimental impact on residents and surrounding areas

The Amendments increase the number of waste bins by one taking the number from 7 shared 240L waste bins to 8, with the shared 360L recycling bins remaining at 9 bins. The total number of bins for kerbside collection is 17. **The kerbside waste collection of these 17 unit bins is NOT on the development site's kerbside BUT on the adjacent property's nature strip** at 39 Novar Street impacting on the property's amenity, leaving no room for the placement of its own bins for collection, and its responsibility to maintain the nature strip (see below).

4.2 Insufficient space for developments residential waste bins

There is insufficient space for the development's residential waste bins and **the information provided is not correct**. The new Waste Report (WASTE-202443505-S178-04) Page 50 has the total set down length of the bins as 13.0m with 10.8m being on the verge of the adjacent property 39 Novar Street but on Page 16 it is 15.3m.

The correct distance required for the 17 bins is a minimum of 15.7m with the 30cm clearance between bins (<https://www.cityservices.act.gov.au/recycling-and-waste/bins>). Under the requirements of the *DCCBPWM 2019* the bins cannot be placed next to the no parking sign adjacent

to the site's driveway – a 1m clearance on either side is required, nor under the overhead power line that crosses the nature strip – a 3m clearance is recommended.

The street trees *Cedrus atlantica* (Atlas Cedar) on the Novar Street nature strips are all regulated trees under the *Urban Forest Act 2023*) and also ACT Heritage Listed (ACT Tree Register PTR090-Group) (https://www.cityservices.act.gov.au/_data/assets/pdf_file/0005/390425/PTR090-Group.pdf). They are up to 25m high and 28m canopy diameter. **The development application does not recognise their protection.** Bins should not be placed under the tree canopy where they will compact the soil and **the proposed major pruning of the regulated, heritage tree canopy to make way for collection should not be allowed.**

Thus all of the proposed development's bins will be located on the neighbour's nature strip as the available space is constrained to 15.5m because of the property driveway and offset for the parking sign. The available space is minimal if the powerline and regulated tree are also avoided. This leaves no room for the property at 39 Novar Street to place its bins, and indeed the Waste Report diagram already shows one of these bins on the nature strip of 37 Novar Street (Figure 3 and [Figure 4](#)).

This does not meet the requirements R2.4 of the Development Control Code for Best Practice Waste Management in the ACT 2019, which is *“the location of the designated collection point, dimensions of the available kerb frontage for the development, clearances to street trees and other obstructions and the indicative MGB presentation layout to ensure sufficient space”*.

The proposed kerbside waste collection is thus non-compliant with the *Development Control Code for Best Practice Waste Management in the ACT 2019* and **has an unacceptable impact on the residence at 39 Novar Street** and its nature strip frontage (Figure 3). This also compromises the property owner's responsibility for the maintenance of their nature strip.

4.3 Commercial Waste

The proposed commercial waste collection for the multi storey development is not workable or compliant.

Collection is proposed via the main driveway, with the rear loading 8.8m MRV (Medium Rigid Vehicle) Garbage Truck reversing into the site driveway from the Novar Street Bus Stop Bay, collecting waste and exiting in a forwards direction, both of which are dangerous. The garbage trucks will thus block the Bus Stop Bay set back whilst manoeuvring, and also block vehicle access to the basement carpark ramp by residents (Figure 5 & Figure 6). The driveway access is also adjacent to the Novar and Bentham Street roundabout. **None of these are allowed under the DCCBPWM 2019 PART 7.4.**

As with residential waste (see above) the development proposes major pruning of the regulated tree on the nature strip on the north side of the driveway to allow for the Garbage truck to have unobstructed access to the site for collection of the commercial waste. **Such major pruning of the tree canopy should not be allowed.**

The design is not workable as it is based on an 8.8m Garbage Truck which is unavailable in the ACT. In the ACT the Commercial garbage trucks are all 11m rear loaders that require more loading space and more manoeuvring room, would be dangerous to the Bus Stop, and owing to their size would have to park over the 2.4m by 2.4m bin loading pad thereby preventing its use for loading the bins.

It is noted that the removal of Restaurants as a use greatly reduces the volume of waste generated, as it is now solely Office the number of waste and recycling bins and their storage meet requirements.

5. Loading Docks – non compliant

The Proposed Development does not meet the requirement of ZS2 – *Commercial Zones Specifications Assessment Outcome 28, specification 28.4 on provision of Loading Docks and Goods Vehicles*

ZS2 – Commercial Zones Specifications

Assessment Outcome 28 - The site is appropriately serviced in terms of infrastructure and utility services and any associated amenity impacts are minimised.

28.4 Loading Docks and Goods Vehicles

28.4 the development complies with the following

(a) Goods loading and unloading facilities are located within the site and allow for service vehicles to enter and leave the site in a forward direction.

The proposed development has 3 Ground Floor Commercial Units for Office totalling 405m². Retail and Restaurant are to be excluded.

No provision has been made within the site for Loading Docks for Goods deliveries for the commercial office units. The plans show that the three commercial premises do not have any rear door access.

No Loading Zones exist in the carparking area at the front of the development in Bentham Street and the eastern site boundary is a Bus Stop Bay. The existing right angle carparking does not meet current standards as the road is far too narrow. Hence it is not possible to provide Loading Zones in this area because of the narrow road and existing parking constraints. Thus under the proposed Development **all deliveries for commercial and retail will need to be at the front of the development resulting in double parking whilst they are in progress which will block the road and the public car parks.**

6. Resident, Commercial and Visitor Parking

The Proposed Development generally meets the requirement of ZS2 – *Commercial Zones Specifications Assessment Outcome 5* and will meet the requirement of:

ZS2 – Commercial Zones Specifications Assessment Outcome 26 in regard to provision of Vehicle parking – providing that Retail, Café and Restaurant uses are formally excluded in the approval and lease conditions. However access to and the **impact on available parking is inadequately assessed.**

ZS2 – Commercial Zones Specifications Assessment Outcome 5 Specification 5.3 - the permitted Ground floor uses in CZ4 includes Shop and Restaurant.

ZS2 – Commercial Zones Specifications Assessment Outcome 26

Vehicle and bicycle parking sufficiently caters for the development while minimising visual impacts from the street or public place. This includes consideration of parking location, dimensions and number of spaces provided.

26.1 The development complies with the following:

a) Parking spaces are provided on site at the rate and location in Table 5

Table 5 Parking provision rates (extract)	
Development in CZ4 Zone	Spaces

<i>Business Agency</i>	<i>3 spaces/100m² GFA</i>
<i>Cafe</i>	<i>10 spaces/100m² GFA</i>
<i>Office</i>	<i>2 spaces/100m² GFA</i>
<i>Restaurant</i>	<i>10 spaces/100m² GFA</i>
<i>Shop</i>	<i>5 spaces/100m² GFA</i>

ZS2 – Commercial Zones Specifications Assessment Outcome 18

Sufficient planting area, canopy trees, deep soil zones and water sensitive urban design measures are provided to enhance living infrastructure, support healthy tree growth and minimise stormwater runoff.

A total of 41 on-site car parking spaces are proposed within two basement levels. That is an additional 5 spaces with four of these provided by further excavation of the Basement level1 under the area between exterior wall of the building and the site boundary with Novar Street and an additional one space on Level 2.

The proposed development now requires 40 spaces and 41 are to be provided. The calculation for 40 spaces is as follows:

Residential 2 spaces per 3 Bedroom unit = 28 spaces
 Visitor 1 space/4 dwellings =4 spaces
 Resident or Service Vehicle=1 space
 Office 404m² GFA 2 spaces/100m² GFA=8 spaces
 Total spaces provided on site=41
 Total spaces required =40

6.1 Impact on planting deep rooted trees

The provision of the 4 additional parking spaces in Basement Level 1 means that **this area of the site allocated for deep root planting can no longer be used for this purpose** as there is a concrete basement under the surface. The Plans (FLOORREG-20244305-S179B-BASEMENT-01 AND LSCAPE- 20244305-S179B-03) still show this area as having trees planted (Figure 7).

The proponent's outcomes response that: *"The proposal provides 27% of the site as deep soil including dimensions necessary for healthy tree growth. There is ample space for canopy trees and increase in permeable ground over existing development"* **has not been corrected to reflect this reduction.**

6.2 Impact on street parking at Local Centre

There is no estimate of the impact of additional street parking required to cater for the customers and clients of the three commercial units - this is currently available on site. This will place further pressure on existing parking at the Shops which is already fully utilized.

The current parking at the Yarralumla Business Centre and Shops at Bentham Street of 46 bays is oversubscribed and its layout causes many accidents, including by former Prime Minister Scott Morrison in 2021. This on road parking area does not meet Australian Standard 2890.5 as it has 90° angle parking on both sides of a road that is only 7m wide. To exit a parking space cars must reverse across the other side of the road causing many accidents. Further parking pressure cannot be sustained.

The updated traffic analysis suggests that there is some on street parking capacity within 200m of the site. This ignores the impact of the development currently underway only 200m away from the site, of 680 dwellings and commercial premises at the Canberra Brickworks and Forestry Place.

7. Privacy– non compliant

The Proposed Development does not meet the requirement of ZS2 – Commercial Zones Specifications Assessment Outcome 6 on adverse impacts within and adjoining sites; Assessment Outcome 16 on privacy of adjoining blocks; and Assessment Outcome 27 on Waste management.

ZS2 – Commercial Zones Specifications

Assessment Outcome 6

Adverse impacts on surrounding uses both within a site and on adjoining sites is minimised and residential amenity protected.

Assessment Outcome 16

Reasonable levels of privacy to dwellings and private open space within a block and on adjoining residential blocks is achieved.

16.1 Minimum separation between buildings is provided in the table below

5-8 storeys Unscreened element to unscreened element 9m. Note this specification is in addition to setback provisions.

Assessment Outcome 27 Waste is appropriately managed on site without having a detrimental impact on residents and surrounding areas.

There is a fully enclosed ground floor swimming pool that forms part of the rear of the building and is offset from the boundary of the adjoining residential property at 39 Novar Street by 6m. The rear offset requirement is 9m for privacy in addition to the setback requirement of 6m.

This is a major shortfall of 9m on the requirement and has a significant impact on noise and the privacy of 39 Novar Street.

8. Noise– non compliant

The Proposed Development does not meet the requirement of ZS2 – Commercial Zones Specifications Assessment Outcome 23 - Environmental risks, including noise, are appropriately considered for the development of the site and compliance with Compliance with Environment Protection Regulation 2005 and Noise Standards ACT cannot be demonstrated.

ZS2 – Commercial Zones Specifications

Assessment Outcome 23

Environmental risks, including noise, bushfire, flood, contamination, air quality or hazardous materials are appropriately considered for the development of the site

23.1 Where any of the following uses are proposed or permitted in the same or an adjacent development: e) Indoor recreation facility, h) outdoor recreation facility i) restaurant -Noise and vibration are to be mitigated to reduce impacts

Compliance with Environment Protection Regulation 2005 and Noise Standards ACT - Noise standards - Access Canberra is required

The Development Application document (NOISE -202443505-01) **states** that because plant and equipment has not been selected **an assessment of external onsite activity noise that may impact adjacent dwellings has not been undertaken.** The criteria to be met in all directions is 45 dB(A) during the daytime period and 35 dB(A) during the nighttime period.

External noise will emanate from the basement car parks, lifts, garage doors, pool plant, air conditioners, water heaters, mechanical exhaust venting of the car park located on the roof, and the plant associated with the commercial tenancies. The design of the Development does not currently provide for venting of the basement car parks.

Each of the 14 residential units has an air conditioning condenser located on the balcony at the rear of the Development facing the adjacent 39 Novar Street dwelling. The noise generated by these individually and together is likely to be considerable with each being a 20kw to 30kw unit. A 20kW air conditioner's outdoor unit typically generates a noise level between 58 dB(A) and 80 dB(A) which would exceed the regulated noise level.

An assessment of the level of external noise emissions likely to be generated from plant and equipment and the impact on areas adjacent to the development **must be undertaken before the Development Application is further assessed**, as modifications to the design and scale of the development are likely to be necessary. This is particularly the case to avoid major impacts on the adjacent 39 Novar Street single storey residential dwelling.

9. Demolition and Construction – non compliant (Figure 8 and Figure 9)

The Proposed Development does not address the requirements of ZS2 – Commercial Zones Specifications Assessment Outcome 28 on amenity impacts of services and utility endorsement of demolition; nor for minimising the impact of demolition and construction as set out in the *Environment Protection Guidelines for Construction and Land Development in the ACT*.

Environment Protection Guidelines for Construction and Land Development in the ACT (Environment Protection Authority) August 2022 on addressing the impacts of noise, air emissions, waste management and land contamination - Environment Protection Guidelines for Construction and Land Development in the ACT.

Other regulatory requirements that apply to demolition and construction including Australian Standard AS 2601-2001.

ZS2 – Commercial Zones Specifications

Assessment Outcome 28

The site is appropriately serviced in terms of infrastructure and utility services and any associated amenity impacts are minimised.

28.3 Demolition – utility endorsement

For demolition works endorsement is achieved from relevant utility providers

There has been no specification or assessment of the approach to demolition and construction and how the impacts on the adjacent area of noise, dust, demolition and construction traffic, crane movements, materials delivery and parking by trades, can be mitigated.

The Plan SEDIMENT- 202443505-1 identifies that the existing carpark area is to be retained during construction, and the construction materials stockpile, construction waste bins and site sheds and amenities are to be located against the boundary of the 39 Novar Street residence with their associated dust, noise and constant activity (Figure 8).

The proposed development requires not only the demolition of the two storey office building and carpark but also the excavation of 85% of the site for the construction of the two levels of basement carparks and access ramps. Thus **it is not possible to retain the existing carpark area and use it for access to stockpile materials, site sheds and construction waste whilst at the same time excavating it for basement carparks** (Figure 8).

Therefore demolition and construction activities and materials cannot be managed on site.

The only available areas are the Bentham Street public parking spaces at the site frontage and the nature strips on the north and east of the development. This would result in the loss of at least 13 car parks, and impact on access to and the safety of the Bus Stop. **These areas should not be utilized for these purposes as this would have major impact** on access to the Yarralumla shopping centre and its amenity (Figure 9).

Demolition and Construction is likely to take at least 2 years. There will be impacts from the heavy traffic taking away demolition and waste, delivering construction materials, and there will be constant beeping as these trucks manoeuvre. In addition there needs to be parking available for the multiple construction workers and trades. The Development Application documents state that a crane will be used to remove construction waste from each floor. **The Development Application makes no provision for parking for trades and no details of management and location of crane and likely impact on traffic.**

Of major concern is the likely impact on the businesses and shops on the northern side of Bentham Street opposite the Development Site. Given the noise, dust construction traffic, cranes, and loss of parking there is likely to be considerable impact on access, amenity and passing trade. The Local Businesses including the Supermarket, Pharmacy and Yarralumla Doctors Surgery and Dental Practice will be affected. In particular the Sushi Ten, Café Farmers Daughter, Cork and Glass, and the dress shop Nunie which have outdoor seating and displays on the footpath, are likely to experience a loss of patronage. These businesses experienced a downturn in trade affecting their viability when the Kent Street Bridge was closed for 4 weeks in 2023 during the construction of traffic lights. Hence a longer term loss of amenity and passing trade during construction is likely to have a major impact.

Support for the existing businesses in the Yarralumla Commercial Centre **during demolition and construction works** on Section 56 Block 22 **must be addressed to ensure the viability of the commercial enterprises located there.**

Figures

Figure 1: Proposed Development in Yarralumla & Zoning & developments in progress of 680 dwellings

Figure 2: Site Location & Constraints - Section 56 Block 22 Yarralumla 16 Bentham Street

Figure 3: PLAN 20244305-S179B-1 shows 14 of 17 Waste Bins for the 14 Units collected from 39 Novar Street nature strip BUT will actually take up ALL the area to avoid the parking sign and will impact the Regulated Tree

Figure 4: Development's Residential Waste Collection

Figure 5: PLAN - TURNTEMPLATE-20244305-S179B-01 Commercial Garbage Trucks turn in Bus Stop Bay and block Basement carpark access

Figure 6: Street View - Commercial Garbage Trucks turn in Bus Stop Bay and block Basement carpark access

Figure 7: PLANS- FLOORREG-20244305-S179B-BASEMENT-01 AND LSCAPE- 20244305-S179B-03)

Figure 8: Demolition (from Sediment Control Plan)

Figure 9: Demolition/Construction Materials- Areas Outside Development Site that may be used

Residential:

- RZ1 - Suburban
- RZ2 - Suburban Core

RZ1 & RZ2 Max height 2 storeys

Commercial:

- CZ4 - Local Centre

Proposed development - 5 storey 14 apartments & 3 commercial offices

Figure 2: Site Location & Constraints - Section 56 Block 22 Yarralumla 16 Bentham Street

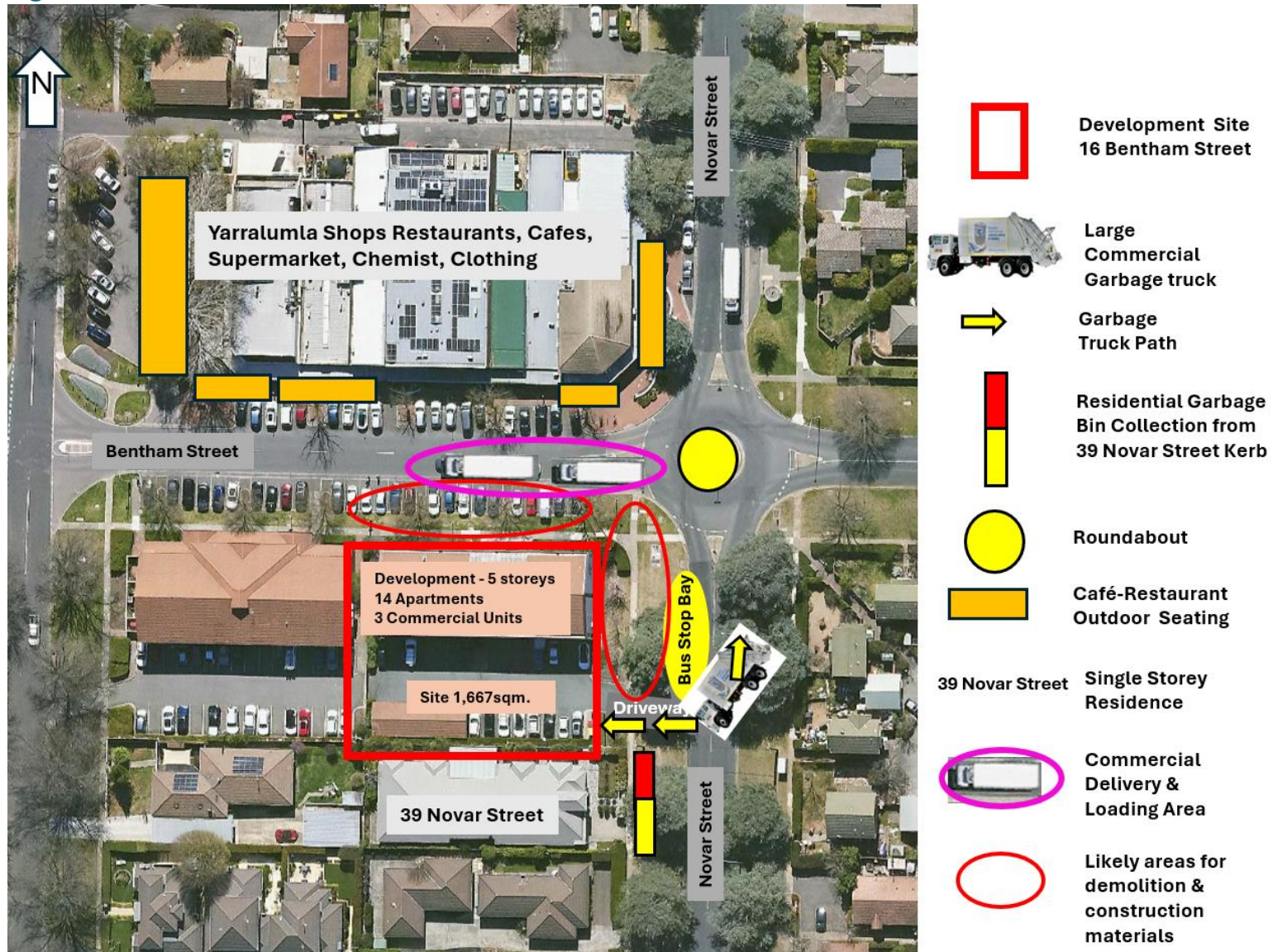


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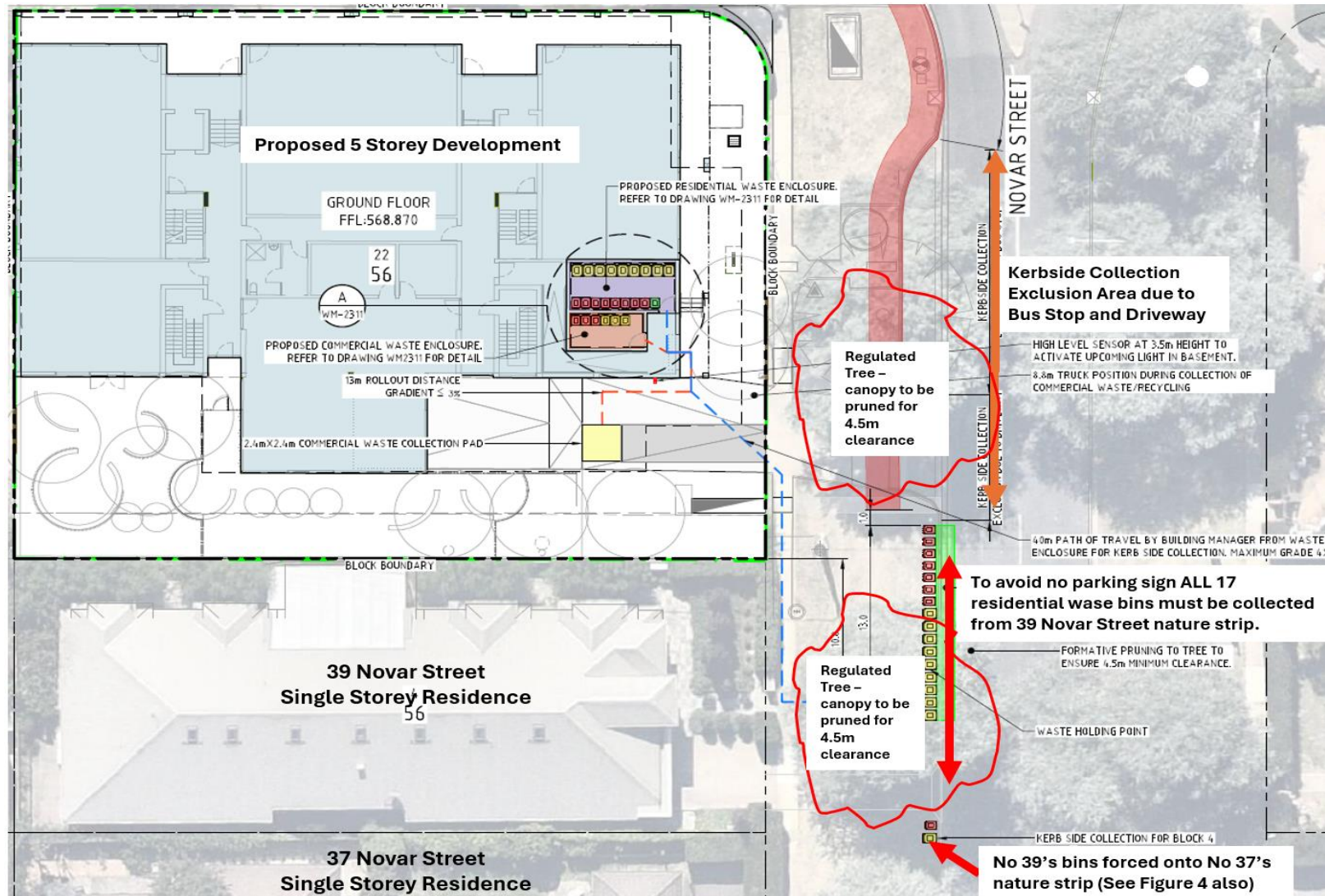


Figure 4: Development's Residential Waste Collection



Figure 5: PLAN - TURNTEMPLATE-20244305-S179B-01 Commercial Garbage Trucks turn in Bus Stop Bay and block Basement carpark access

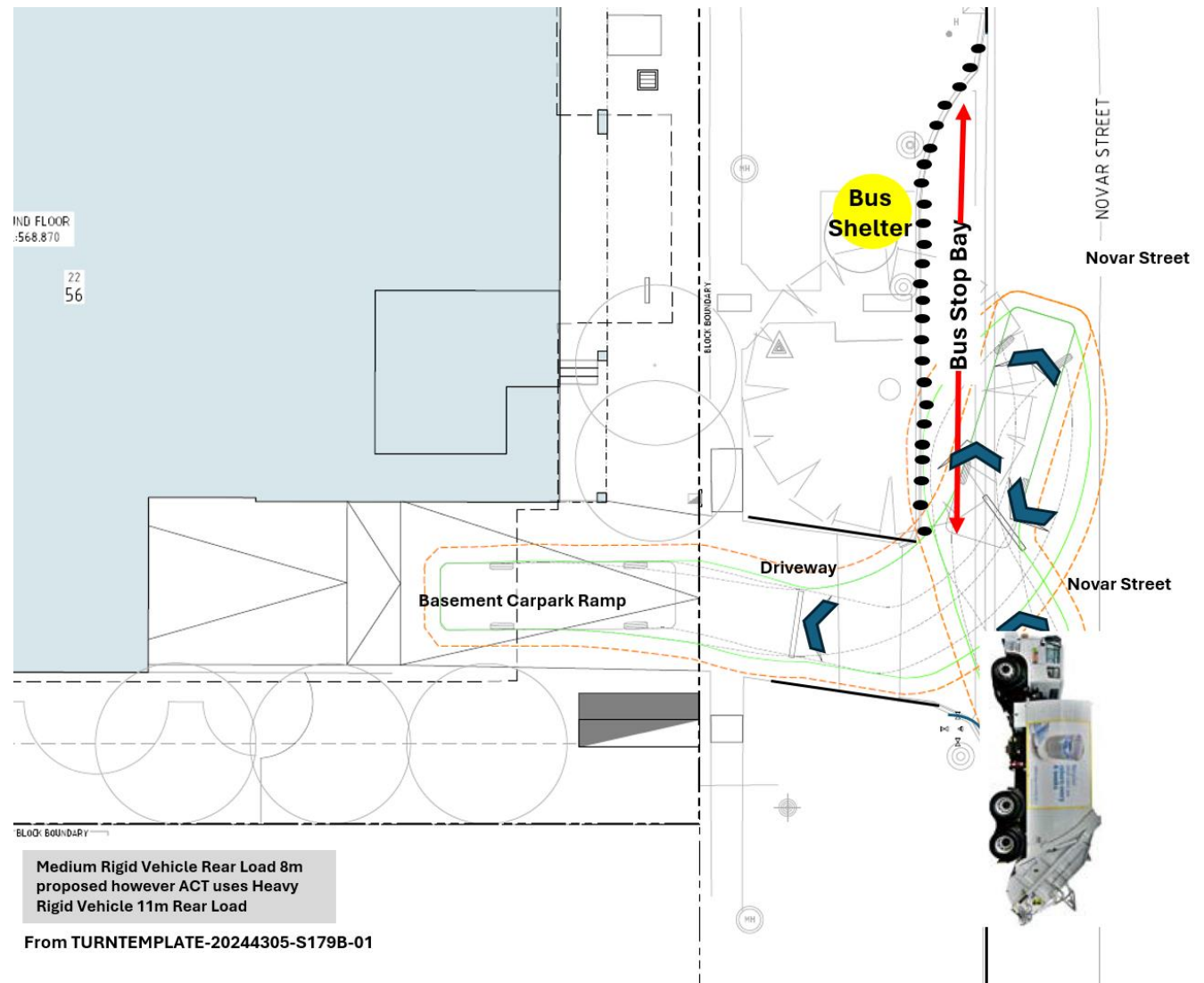


Figure 6: Street View - Commercial Garbage Trucks turn in Bus Stop Bay and block Basement carpark access



Figure 7: PLANS- FLOORREG-20244305-S179B-BASEMENT-01 AND LSCAPE- 20244305-S179B-03)

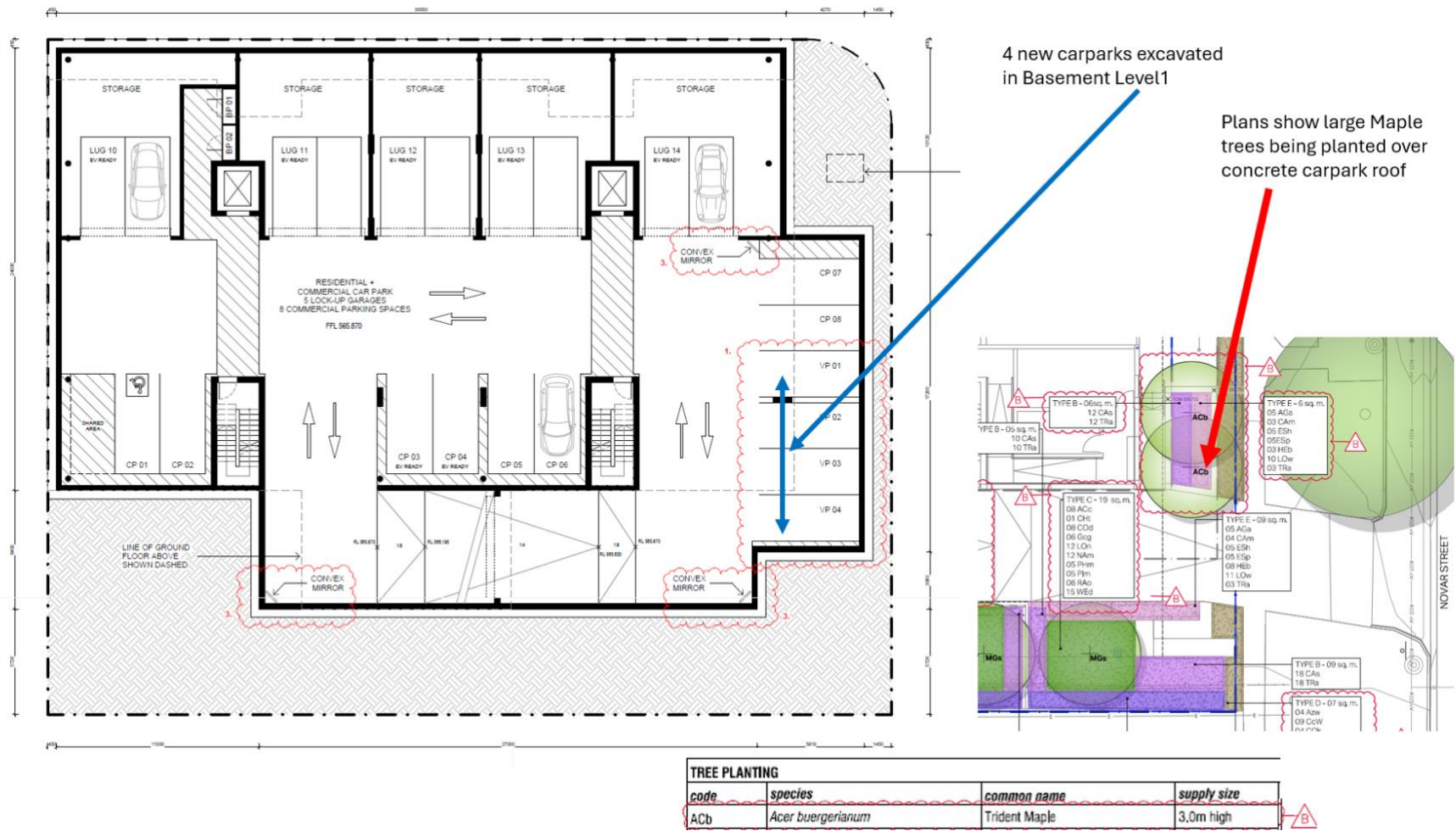


Figure 8: Demolition (from Sediment Control Plan)

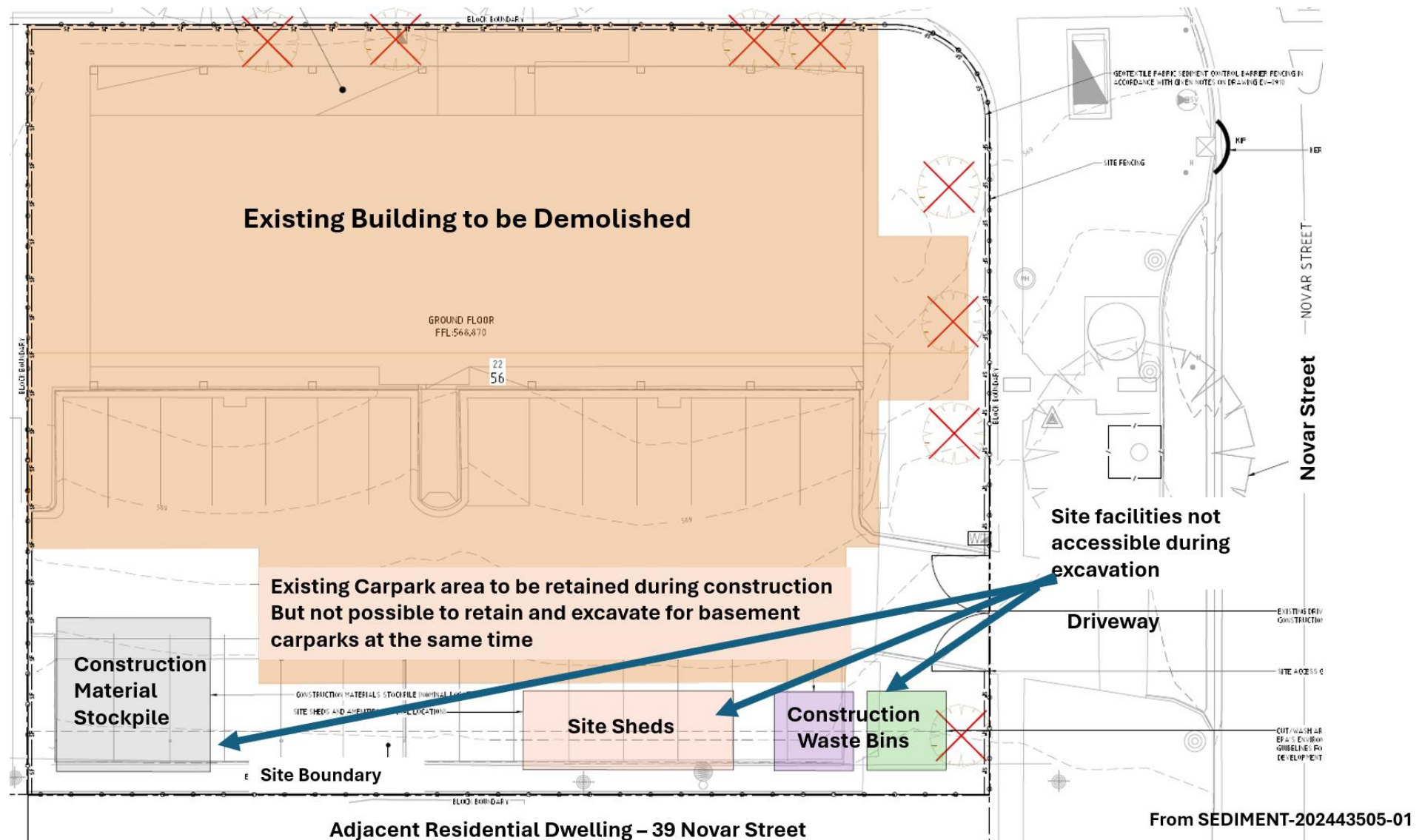
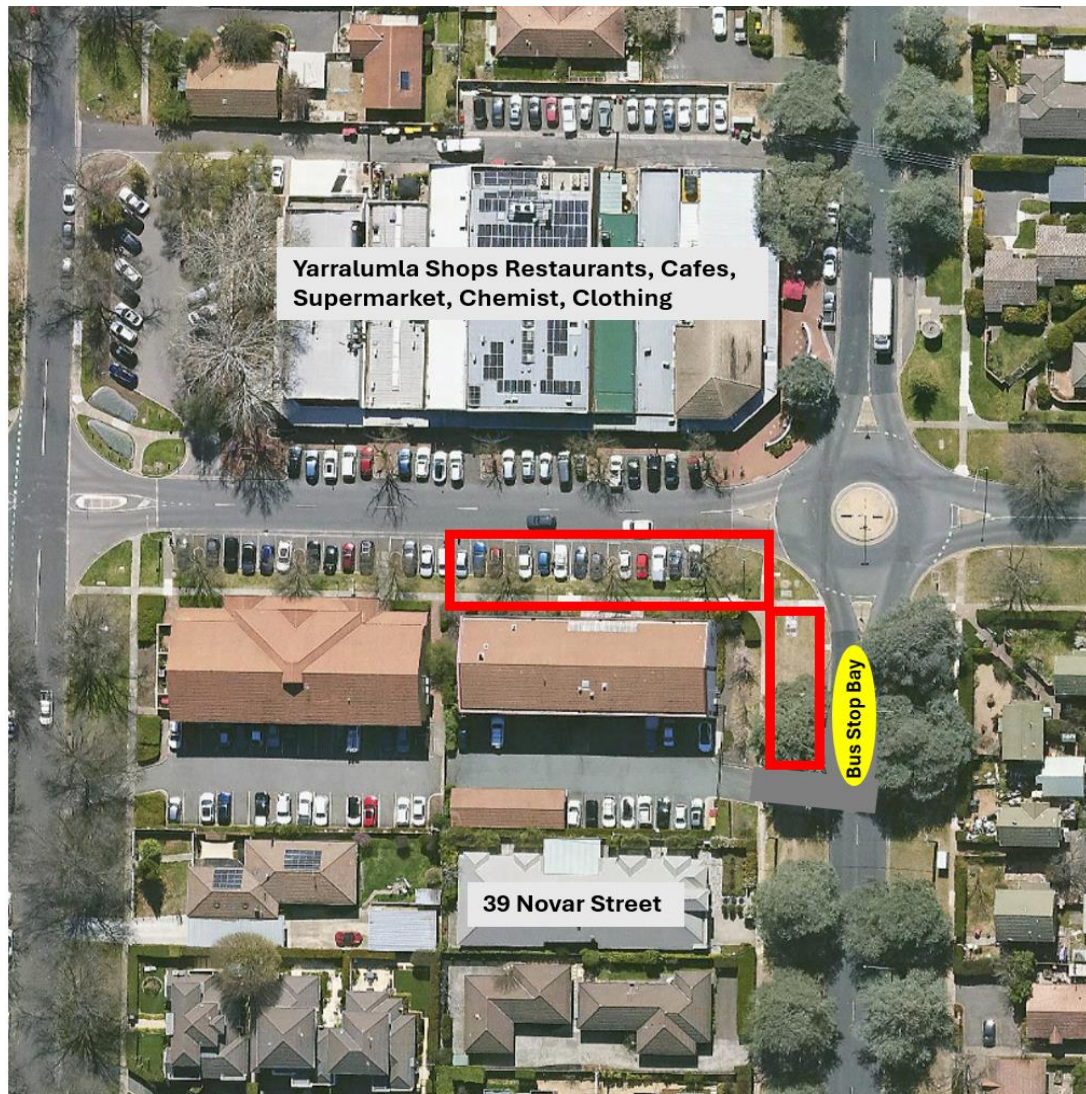



Figure 9: Demolition/Construction Materials- Areas Outside Development Site that may be used



 Areas outside site that are likely to be appropriated for storage of demolition and construction materials, and location of site offices