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DRAFT VARIATION 333 STUART FLATS

The Griffith Narrabundah Community Association (GNCA) appreciates the opportunity to comment on Draft Variation 333 (DV333), particularly as we were able to participate in the extensive consultation process that took place on the proposed re-development of this site. We hope our comments will contribute towards a high quality outcome in the Light Street Precinct (formerly known as the Stuart Flats).

Summary

The GNCA supports the re-development of this part of Griffith. It is probably desirable to achieve a more balanced distribution of public housing between inner and outer Canberra suburbs than exists at present. The Government's "salt and pepper" social housing policy is desirable. Long term public tenants who have lived in the Stuart Flats for years should have an opportunity to continue to live in the area if they wish to do so.

The development would have a significant impact on Manuka and its surrounds. A development as canvassed in the supporting documents would increase the population of the site by about 600 to about 850. There would need to be parking for 688 vehicles. This would require some 24,390m², or about 96.6% of the total area of the redevelopment. Traffic flows will increase by about 2,100vpd to about 3,000vpd. Traffic loads on Stuart St would increase by 1,400vpd to 4,750vpd (158% of capacity) and on Evans Cr by 700vpd to 1,378vpd (138% of capacity). It appears likely that these flows would have a major and clearly noticeable impact on local traffic.

We endorse Territory and Municipal Services Directorate's (TAMSD's) call on Environment and Planning Directorate (EPD) to **ensure that all traffic impacts on the surrounding suburban and arterial road networks are evaluated and resolved. The GNCA believes that the Traffic Assessment needs to be redone taking into account recently completed, currently underway, and proposed development in the area to adequately address the impact on the neighbourhood as a whole.** The GNCA shares TAMSD concerns that the Traffic Assessment Report does not appear to have given any consideration as to how the expected traffic increase will impact on the surrounding arterial roads.

The DV and the Precinct Code should indicate whether EPD accepts TAMSD's view that the proposed Site Access Road delivering traffic to Captain Cook Cr should not be permitted. **The GNCA would be most strongly opposed to road safety issues being subordinated to the desire to increase the possible sales price of the redevelopment site.**

GNCA opposes the proposed excision of 860m² from Block 5 Section 43.

GNCA recommends that the Precinct Code:

- 1) Requires that the entire site be subject to an integrated Estate Development Master Plan, even if the site is sold off in a number of lots, rather than in one lot. Development by one developer would be our preference;**
- 2) Specifies that the maximum number of dwellings on the site, whether apartments or townhouses, shall not exceed 400 dwellings, and no more than 50 one bedroom units and no more than 224 two bedroom units, and no less than 30 town houses (note that this formula allows one or two bedroom units to be replaced by three bedroom apartments or town houses);**
- 3) Specifies that a child care centre be established as part of the redevelopment; and**
- 4) Requires any developer to maintain and preserve all but the Poor Value Regulated Trees.**

GNCA recommends that:

- 5) The "b" area at the corner of Light and Stuart Streets be merged with the adjacent "a" area (areas b₃ and a₂ under our proposed definition, see below), and building heights be limited to two storeys.**
- 6) All "a" areas (including those created by Recommendation 5 above) on the site be zoned as RZ2;**
- 7) The provision in Rule R21 that permits an additional floor for parking be amended to preclude its application to any "a" areas.**
- 8) Criterion C24 be converted to a Mandatory Rule, and require that**
 - (a) Block 17 be identified to provide for continuing pedestrian access through the site; and**
 - (b) the existing access from the site to Canberra Av. via Block 20 Section 39 be maintained.**
- 9) A new Block be created for the second pedestrian route from Light St to Captain Cook Cr, and that this be recognised in the Precinct Code, either in the converted Rule R24 or elsewhere.**

Comments on the Precinct Code

- 1. The statement of Desired Character be amended as suggested.**
- 2. As well as stipulating the number of storeys the building heights must also be specified.**
- 3. The definitions of the various areas a, b and c in Rule R21 should be replaced, either within R21 or elsewhere, with the definitions we propose in Attachment B.**
- 4. The maximum heights of buildings in the various zones be specified (in metres) in the Rules and the modifying Criteria C22 and C23 be removed.**
- 5. All the terms used in Criteria C25 and C26 need to reviewed and clarified.**
- 6. Criterion C26 should be converted to Rule R26 and be made a Mandatory Rule.**

Background

The site is currently occupied by the Stuart Flats, which comprise 29 bedsitter apartments and 117 two bedroom apartments or a total of 146 dwellings with 263 bedrooms. The Stuart Flats were built in 1959. The redevelopment site has an area of 25,240m². Although the Precinct Code is silent on this, it appears from the supporting documents that the Government is contemplating redevelopment of the site to provide 500 dwellings comprising 200 units with 1 bedroom, 224 units with 2 bedrooms and 76 units with 3 bedrooms, for a total of 876 bedrooms (Traffic Impact Assessment, May 2015, p12). We may assume that this is the maximum development that the Land Development Agency (LDA) believes could be approved for the site.

A development of 876 bedrooms would have about 850 residents (see ATTACHMENT A for how this is estimated), or about 600 more than the current number of residents. As the population of Griffith was 3,900 people in 2011, this is an increase of 15.4%, or about one sixth. This could be expected to have a significant impact on facilities, including the ease of parking and road usage in the area. The Traffic Impact Assessment estimates vehicle traffic at 6 trips per day per unit, or for a development of 500 dwellings some 3,000 vehicles per day (vpd). While there are reasons to believe that this figure is conservative, it is an increase of about 2,100vpd over the current estimated traffic generated by the site. Using the rules in the Parking and Vehicular Access Code, the proposed development would be required to provide parking for 688 vehicles, which we may assume is the smallest estimate of the number of residents' vehicles that can reasonably be defended. In addition there would be a need for one visitor parking space for every four dwellings or 125 visitor parking spaces. At 30m² per car parking space the space requirements are consequently 24,390m², or about 96.6% of the total area of the redevelopment.

General Comments

The GNCA supports the re-development of this part of Griffith. We recognise that the current buildings on the site were built in 1959 and have now probably reached the age when

rebuilding is a more economic option than continued maintenance and refurbishment to meet current standards. In addition we recognise that it is probably desirable to achieve a more balanced distribution of public housing between inner and outer Canberra suburbs than exists at present. We also see the Government's "salt and pepper" social housing policy as desirable, under which public housing tenants are mixed in at a relatively low proportion with private tenants and owner occupiers. We would hope that long term public tenants who have lived in the Stuart Flats for years have an opportunity to continue to live in the area if they wish to do so.

While we address Traffic and Parking issues in the discussion below, note that Traffic and Parking are considered in greater detail in ATTACHMENT A.

It seems likely that development of 500 dwellings such as that apparently contemplated would have a significant impact on Manuka and its surrounds.

The area required for parking as cited above indicates that with the proposed development there will be a need for extensive underground car parking. However, unless basement car parking is restricted to being only under buildings most of the large Regulated Trees on site will have to be removed. This is because an underground car park would preclude deep rooted tree above unless special provision were made for areas of unusually deep soil beds. In a development of the size mooted it appears that a significant fraction of the site will have to be underlain by basement car parking, dramatically reducing the area available for deep rooted trees. There is a real possibility that if this is not managed well the entire site could become a concrete wasteland. This is likely to reduce the price received for the site – this might well be a case where less is more.

If the estimates of required parking spaces turn out to have underestimated the demand there may well be a significant increase in on street parking within easy access of the site say 300 to 400 metres from the site in surrounding streets. This would be inconvenient for existing residents of the area, workers at Manuka, and shoppers.

The estimated increase in local traffic by over 2,000vpd, and the need to provide parking equivalent to 96.6% of the area of the redevelopment are indications that the proposal to build 500 dwellings on the site would be an over-development. Thus it is probable that the Traffic Assessment Report's conclusion that these numbers will not impact on the neighbourhood is too optimistic. It would seem that TAMSD shares these concerns. TAMSD has commented, on the Draft variation at p17 of the DV, that

The proposed development will require adequate infrastructure upgrades around road network and good footpath connections. EPD has to ensure traffic impacts from the proposed developments are evaluated and resolved. The proposed development will have an impact on the existing road network in relation to capacity and performance at the intersection of Stuart Street/Captain Cook Crescent, Stuart Street/Hann Street, Stuart Street/Lockyer Street, and other neighbouring intersections. Consideration should also

be given to the surrounding arterial road network on Canberra Avenue and major collector roads Captain Cook Crescent, Flinders Way, and Jerrabomberra Avenue.

We can only endorse TAMSD's call on Environment and Planning Directorate (EPD) to **ensure that all traffic impacts on the surrounding suburban and arterial road networks are evaluated and resolved.**

In addition, TAMSD has doubts about a critical major traffic feature of the redevelopment. This is the construction of a new Site Access Road running between Light St and Captain Cook Cr, and located approximately 125m north of the existing intersection of Captain Cook Crescent and Stuart Street. TAMSD has indicated its opposition to this proposal on p17 of the DV where it comments

Access arrangements to the proposed development should not be from Captain Cook Crescent due to the close proximity to Canberra Avenue.

If the Government accepts TAMSD views then this will have a major impact on traffic flows around the redevelopment. The neighbouring roads are: Captain Cook Cr, a Major Collector Road with an assessed capacity of 3,001 to 6,000vpd; Stuart St, a Minor Collector Road with an assessed capacity of 1,001 to 3,000vpd; and Evans Cr and Light St, Access Roads each with an assessed capacity of 1 to 1,000vpd.

The Traffic Assessment Report (assuming the existence of the Site Access Road) concludes that "*Captain Cook Crescent and Evans Crescent are not expected to exceed the allowable volume of vehicles per day*", that "*Stuart Street has been estimated as being greater than the maximum allowable traffic volumes for a Minor Collector Road*" but that "*the number of vehicles which utilise Stuart Street ... will be reduced*" due to traffic using the Site Access Road, and that "*As 1700 vehicles per day are expected to utilise Light Street ... the maximum allowable daily traffic volume for Light Street will be exceeded... Despite this, ... the priority controlled intersections of Light Street and Evans Crescent and Light Street and Stuart Street [are expected to] perform well.*"

It is true that traffic on Captain Cook Cr is not expected to exceed 6,000vpd, but it is expected to grow from a current level of 4,264vpd to an estimated 5,780vpd, or 96.3% of capacity, which means periods in excess of capacity can be expected. We leave it to readers to assess whether it is plausible that traffic flows on Stuart St will actually be reduced, we argue in ATTACHMENT A that this is unlikely to be the case. We also have some doubts about how smooth traffic flows will be along Light St at 170% of its current capacity.

However, if a significant proportion (2,100vpd) of the traffic expected to be generated by the redevelopment cannot be channelled from Light St to Captain Cook Cr by the proposed Site Access Road, all traffic either entering or leaving the site will have to do so via Stuart St or Evans Cr, either directly or by way of Light St. Allocating this additional traffic in the same

ratio as currently generated traffic from the site (p18) would raise expected traffic loads by 1,400vpd to 4,750vpd on Stuart St (158% of capacity) and by 700vpd to 1,378vpd on Evans Cr (138% of capacity). Thus it appears likely that these flows would have a major and clearly noticeable impact on local traffic.

We also note that the Traffic Assessment Report does not take account of the potential impact of the Baptist Care 160 bed aged care facility near Griffith shops on traffic flows on Stuart St. Neither does it pay any attention to the potential impact of development currently underway, such as that at St Christopher's Manuka, the former Brumbies site on Flinders Way and La Perouse St or the proposed redevelopment at Gowrie Court at the end of Stuart St and the mooted multi storey DHA redevelopment of the MOCCA site and adjacent block directly across Captain Cook Cr. **The GNCA believes that the Traffic Assessment needs to be redone taking into account these development to adequately address the impact on the neighbourhood as a whole.**

The GNCA shares TAMSD's concerns that the Traffic Assessment Report does not appear to have given any consideration as to how the expected traffic increase will impact on the surrounding arterial roads.

If EPD accepts TAMSD's professional assessment that the proposed Site Access Road is not appropriate then this should be stated in the Precinct Code, so that potential developers can fully assess the constraints of the site. If, on the other hand, EPD does not accept this view, it needs to provide a coherently argued case in the DV why this would be in the public interest. We would not regard a desire to maximise the potential value of the site as a convincing argument. **The GNCA would be most strongly opposed to road safety issues being subordinated to the desire to increase the possible sales price of the redevelopment site.**

Urban open space is very precious in Manuka and, because this development will significantly increase the population there, it is important that this valuable space is not reduced. Consequently, to contribute to Environmental and Social Sustainability (*Key Sustainable Development Principles in the ACT Territory Plan*) all the land zoned as Urban Open Space must be retained. Therefore the **GNCA opposes the proposed excision of 860m² from Block 5 Section 43**. This Public Open Space zoned land should be left as part of the park.

On the whole the proposed development reflects the constraints of the topography of the site. However, the projected parking needs and traffic flows suggest that 500 dwellings is more than the site can support, and thus it appears that some reduction in the number of dwellings proposed would be prudent. In addition the redevelopment proposed by in the DV's supporting documentation appears to be larger than what some had understood was proposed at the conclusion of the community consultations. We would recommend that the maximum number of dwellings on the redevelopment be restricted to 400, which will still have

significant impacts on the neighbourhood through increased population, parking needs and traffic flows, but would make these somewhat more manageable.

We recommend that the mix of dwelling types be re-considered. As stated in the 'Reasons for the Draft Proposal' (DV 333 p9) the development should provide for a diversity of housing types close to the Group Centre. Unfortunately it appears that 85% of the new dwellings are to be either one or two bedroom apartments. Such small apartments are usually completely unsuitable for and unattractive to couples who wish to downsize, and in today's market there is a glut of one bedroom apartments. Consequently we recommend that there be more three and four bedroom apartments or town houses adjacent to the park on Evans Crescent and Stuart Street. The addition of town houses to the proposed housing mix on site, and more three/four bedroom apartments and fewer one bed apartments would reduce the number of car places required per bedroom and improve the quality of the development, while offering the public a wider choice of housing type.

It is generally conceded that Kingston Foreshore has been less successful than it need have been due to a lack of coordinated planning. To maximise the amenity and the development potential of the site we recommend that the entire site be planned and developed as a unified whole, by being subject to an integrated Estate Development Master Plan, even if the site is sold off in a number of lots, rather than in one lot. Development by one developer would be the GNCA's preference.

As noted above there are a number of developments proposed or underway in the Manuka vicinity, and yet there appears to be no provision for additional childcare, and indeed the Government appears determined to eject the one childcare centre currently located in Manuka. A large development such as this would seem to provide the opportunity to establish further child care places near a busy group centre. Given the large number of new dwellings to be located on this site and the shortage of child care places this would only improve the amenity and desirability of any redevelopment of this site. We believe that either Block 1 or Block 2, Section 43 would make an excellent site for a childcare centre, but anywhere within the redevelopment would be acceptable.

We note that the Precinct Code is silent about trees. The Tree Assessment Report indicates that there are 66 Regulated Trees on the site, of which one is of Exceptional Value, 14 are of High Value, 41 are of Medium Value, and 10 are of .Poor Value. The Precinct Code should specify what the fate of these trees is to be. The well treed nature of Griffith is one of the suburb's major attractions and any redevelopment should seek to preserve this feature as much as possible (and hence maximise the return available to the Government for the site). We believe that any developer should be required to maintain and preserve all but the Poor Value Regulated Trees. In this regard we note that the need for extensive underground parking to accommodate all the car parking spaces required for a redevelopment of the size proposed will make the preservation of these trees somewhat challenging. We take this as

further evidence that the proposed redevelopment is excessively large and should be scaled back.

In light of the above considerations the GNCA recommends that the Precinct Code:

- 1) **Requires that the entire site be subject to an integrated Estate Development Master Plan, even if the site is sold off in a number of lots, rather than in one lot. Development by one developer would be our preference;**
- 2) **Specifies that the maximum number of dwellings on the site, whether apartments or townhouses, shall not exceed 400 dwellings, and no more than 50 one bedroom units and no more than 224 two bedroom units, and no less than 30 town houses (note that this formula allows one or two bedroom units to be replaced by three bedroom apartments or town houses);**
- 3) **Specifies that a child care centre be established as part of the redevelopment; and**
- 4) **Requires any developer to maintain and preserve all but the Poor Value Regulated Trees.**

We have a number of further suggestions, which we consider will improve the quality of the development.

We note that the provision in Rule R21 *“For areas ‘a’, ‘b’, and ‘c’ one additional storey is permitted where it is car parking that is a continuation of basement car parking”*. This will have the effect of permitting one additional storey to those specified for each of areas **“a”**, **“b”** and **“c”** in the rule. As a consequence, it is likely that rather than the three storeys apparently provided for under the Precinct Code, the site will be bounded by four storey apartment blocks. We would regard this as undesirable.

The three **“a”** areas are directly opposite high quality RZ1 detached houses in Stuart Street and Evans Crescent. The proposal to build three (read four, see above) storey buildings in these areas cannot in any way be considered as being ‘sympathetic to the existing garden neighbourhood character of this part of Griffith in terms of form and landscape character’ as stated in the Light Street Precinct Code. **The “a” areas should be equivalent to RZ2 zones and the DV should rezone them to one of these more appropriate zonings. And to ensure that any buildings constructed in the “a” areas are only a maximum of three storeys high, the provision in Rule R21 permitting an additional floor for parking should be amended to omit its applicability to any “a” areas.**

It is completely unacceptable to propose to construct four storey buildings in Section 43, area **“b”** (area **b₃** under our proposed definition, see below), which abuts the urban open space (aka Light St Park). Such buildings would dominate the open space (with a roof 8 to 10

metres above the highest spot in the park) and one wonders whether any 3D modelling has been done to indicate what the visual affect would be. Rather than trying to squash in an excessive number of apartments, it would be much better to **combine the areas “a” and “b”** at the corner of Light and Stuart Streets (areas **a₂** and **b₃** under our proposed definition); categorize this area as “**a**” (**a₂**) and **limit the buildings to two storeys**. This would then enable a wider range of housing type in the Precinct that would be more sympathetic to the surrounding dwellings (*Strategy 3 in the 2012 Planning Strategy*).

We cannot see the benefit or the logic of zoning areas “**a**” and “**b**” (areas **a₂** and **b₃**) in Section 43 as RZ5. **These areas should be zoned as RZ2**, which better reflects their height and density, consistent with our comments above. To insist on zoning large parts of the site as RZ5, which is a zoning category higher than the development currently proposed for that portion of the site, would just invite continuing pressure from developers to redevelop that portion of the site to a density commensurate with its zoning, no matter how inappropriate for its location

Consequently the GNCA recommends that:

- 5) **The “b” area at the corner of Light and Stuart Streets be merged with the adjacent “a” area (areas **b₃** and **a₂** under our proposed definition, see below), and building heights be limited to two storeys.**
- 6) **All “a” areas (including those created by Recommendation 5 above) on the site be zoned as RZ2;**
- 7) **The provision in Rule R21 that permits an additional floor for parking be amended to preclude its application to any “a” areas.**

We believe that it is important to maintain public pedestrian access between Captain Cook Crescent and the Light Street urban open space, and between this space and Canberra Av. At present, pedestrian access between Light St and Captain Cook Av is provided along Block 17, and this works well because this path runs along the boundary between Blocks 1 and 15 of Section 39. It also fits in well with the pedestrian crossing on Captain Cook Crescent to Manuka shops. There is also currently public pedestrian access from Light St to Canberra Av. via Block 20 Section 39

We therefore recommend that Block 17 be excluded from the re-zoning and maintained as a pedestrian access route. The proposed Criterion C24 permits continuing pedestrian access between Captain Cook Cr and Light St, but as a Criterion this will have little force if a developer is disinclined to this view. **This Criterion should consequently be converted to a Mandatory Rule, and require that Block 17, or some other equivalent separate and defined land parcel, be identified to provide for continuing pedestrian access through the site.** Any other arrangement would appear to leave any continuing pedestrian right of way at the whim of the body corporate, which is scarcely a satisfactory outcome. It would also be

desirable to **specify that the existing access from the site to Canberra Av. via Block 20 Section 39 be maintained.**

We also note that there is another pedestrian access route along the northern boundary of Block 14 (roughly following the sewer easement and the proposed new Site Access Road), although this does not have its own Block. As there will be many more people in the new precinct it would be preferable to have two pedestrian access routes from Light Street through to Captain Cook Crescent. Consequently the Precinct Code should **formally recognise the second route from Light St to Captain Cook Cr following the existing sewer easement and recommend that this be recognised by creating a new Block.** We note that this path would follow the proposed route for the new Site Access Road, but this pathway should be created whether or not the New Site Road is actually constructed.

The GNCA consequently recommends that:

- 8) **Criterion C24 be converted to a Mandatory Rule, and require that**
 - (a) **Block 17 be identified to provide for continuing pedestrian access through the site; and**
 - (b) **the existing access from the site to Canberra Av. via Block 20 Section 39 be maintained.**
- 9) **A new Block be created for the second route from Light St to Captain Cook Cr and that this be recognised in the Precinct Code, either in the Converted Rule R24 or elsewhere.**

Comments on the Precinct Code

The Precinct Code contains some occasionally clumsy drafting which suggests that the Variation may have been prepared without adequate opportunity for appropriate review. It is important that the Precinct Code is clear and unambiguous so what is finally built is consistent with the Desired Character. We therefore suggest that the Code be amended in some sections.

Page 21 “Desired Character”:

The second dot point reads “The buildings express a geometric form with building heights stepping down...” What other form could the buildings express but geometric?

- 1) Suggest that this **be changed to “Building heights will step down ...”**

The tenth dot point states “Pedestrian permeability and accessibility through the site is to be maintained”. This suggests that non-resident pedestrians will be able to walk through all areas of the site, which might not be ideal for the residents for privacy and security reasons. The word “permeability” should be removed as it does not add to the meaning, and some potential pedestrians might object to being classified as being permeable.

- 1) **This point should be amended to “Pedestrian accessibility through the site is to be maintained by clearly marked pedestrian pathways”**

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Height is a more important parameter when defining visual impact than the number of storeys.

- 2) **As well as defining the number of storeys, the building heights must also be defined.**

In R21 a) and R21 b) attempts are made to define areas “a” and “b” for the purpose of specifying the number of permitted storeys for buildings on various areas of the redevelopment, but this has resulted in gibberish. Two dimensional areas cannot be measured as a one dimensional length (e.g. 20 metres). In addition, no definition is offered for that part of area “b” on Light St, and no attempt has been made to define the “c” areas. Figure 4 (page 25) schematically divides up the site into three separate areas marked “a”, two (or is it three?) areas marked “b”, and two (or again possibly three, the Figure is not easy to interpret) areas marked “c”. No dimensions or bearings are marked on the Figure, meaning that it cannot be relied upon to determine whether any particular element of the site is actually within area “a”, “b” or “c”. As the DV will become legislation it is important that these areas be defined unambiguously.

- 3) **The definitions of the various areas a, b and c in Rule R21 be replaced, either within R21 or elsewhere, with the definitions we propose in Attachment B**

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Criteria C22 and C23 are too vague and are essentially subjective assessments. To one person, what is being proposed would be dominating and to another it would not. As indicated in point (k) above, we recommend that

- 4) **The maximum heights of buildings in the various zones be specified (in metres) in the Rules and the modifying Criteria C22 and C23 be removed** (as there would then be no need for the Criteria). If the buildings in the “a” areas are only two storeys then the domination factor disappears.

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Some of the Criteria in C25 and C26 are too vague and open to subjective interpretation.. For example, what is meant by:

- “a cohesive sequence”?;
- “a useable size and dimensions”?;
- “reasonable safety and functionality”?;
- “reasonable solar access”?;
- “reasonable safety and functionality”?

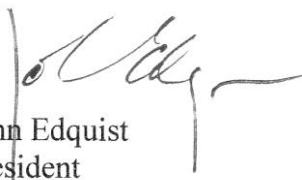
- 5) **All these terms need to reviewed and clarified.** If they are to be meaningful, and are to provide guidance to some future EPD officer trying to decide whether a development proposal is consistent with the Precinct Code, they need to be defined and examples of what is regarded as reasonable, useable, etc. need to be given. In relation to Solar Access, is it intended that that these rules replace or supercede those introduced in Variation 306?

As with Criterion C24, Criterion C26 is a Criterion without a Rule. This is meaningless and has no force, as it modifies no rule.

- 6) **Criterion C26 should be converted to Rule R26 and be made a Mandatory Rule.**

We look forward to a revised Light St Precinct Code reflecting unambiguously the outcomes of the community consultations conveying clearly to both the community at large, and potential investors and developers, what will be permitted during the redevelopment of this site.

Yours faithfully



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President

16 August 2015

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ATTACHMENT A

TRAFFIC AND PARKING ANALYSIS

The proposed development will have (according to the Traffic Impact Assessment Report of May 2015) a total of 876 bedrooms. How many residents might we expect in such a development? If we assume one resident per bedroom this amounts to some 876 residents. By contrast the existing buildings contain 263 bedrooms and (using the same logic) an estimated 263 residents, so we would be looking at an increase of 613, let's say about 600 residents. Alternatively, if we assume 1.5 residents in each one or two bedroom unit, and 2.5 in each three bedroom unit, then the redevelopment would house 826 residents, against 219 for the existing buildings, a net increase of 607, much the same number. Given that the population of Griffith was 3,900 people in 2011, this is an increase of 15.4%, or about one sixth. This could be expected to have a significant impact on facilities, including the ease of parking, and road usage, in the area.

Territory and Municipal Services Directorate Reservations

Before we discuss traffic issues associated by the proposed redevelopment in detail, we should note TAMSD's views about this matter. It would seem that TAMSD is not convinced that the traffic impacts of the redevelopment will be problem free. In TAMSD comments on the Draft Variation at p17 of the DV, it states

The proposed development will require adequate infrastructure upgrades around road network and good footpath connections. EPD has to ensure traffic impacts from the proposed developments are evaluated and resolved. The proposed development will have an impact on the existing road network in relation to capacity and performance at the intersection of Stuart Street/Captain Cook Crescent, Stuart Street/Hann Street, Stuart Street/Lockyer Street, and other neighbouring intersections. Consideration should also be given to the surrounding arterial road network on Canberra Avenue and major collector roads Captain Cook Crescent, Flinders Way, and Jerrabomberra Avenue.

We can only endorse TAMSD's call on EPD to ensure that all traffic impacts on the surrounding suburban and arterial road networks "are evaluated and resolved".

In addition, TAMSD has doubts about a major traffic feature of the redevelopment. This is the construction of a new Site Access Road running between Light St and Captain Cook Cr, and located approximately 125m north of the existing intersection of Captain Cook Crescent and Stuart Street. We also note that it is proposed that the existing bus stop be relocated to the south of its current position, and that this will result in the loss several on-street car parking spaces. This will be a further inconvenience for locals shopping at Manuka, which

we can expect to be considerably busier than at present given the significant number of new developments proposed or underway in the Manuka vicinity..

TAMSD has indicated its opposition to this proposal on p17 of the DV where it comments
Access arrangements to the proposed development should not be from Captain Cook Crescent due to the close proximity to Canberra Avenue.

This would seem to mean that the proposed Site Access Road will not proceed. As a consequence all the traffic generated by the new development will have to use Stuart St or Evans Cr, and it seems likely that the capacities of both these roads would be exceeded. Clearly **the proposed size of the redevelopment needs to be reconsidered** if it is impossible to develop the site to the degree proposed without accessing the site along its Captain Cook frontage. The GNCA supports TAMSD view of the undesirability of an entrance to the site on Captain Cook Cr and would be most strongly opposed to road safety issues being subordinated to the desire to increase the possible sales price of the redevelopment site.

Comments on the Traffic Assessment Report

The Future Daily Traffic analysis is at p17ff in the Traffic Assessment Report. At present the only vehicular access to the site is via Light St, so total traffic to and from the site can be easily obtained by counting traffic entering and leaving Light St at the Stuart St end and at the Evans Cr end. While it appears that traffic numbers at the intersections of Stuart St and Light St, and Evans Cr and Light St, were actually counted on 3 June 2014, this data does not seem to be used in the report. Instead of using observed data, current traffic at the site is estimated at 6 vehicle trips per dwelling per day, or 876 vpd. The same factor is used to estimate vehicle numbers for the new development, which is calculated at 3,000 vpd.

Our preference would have been for new traffic estimates to have been prepared by upwardly pro rata-ing the observed traffic generated by the existing dwellings by the ratio dwellings in the proposed redevelopment to the number of existing dwelling (ie 500/146). Although such estimated future traffic flows would be more accurate than those currently estimated, they would still have been conservative. This is because the new residents can be expected to have considerably higher incomes than the current public housing residents, and consequently will have a higher propensity to car ownership. It is also possible that employment levels may be higher, although whether this would lead to more, or less, trips per day is moot but perhaps deserves investigation. A better alternative method of estimating likely traffic flows would therefore be the ratio of cars in the proposed redevelopment by cars in the existing dwellings (using required car parking spaces as a proxy to estimate car numbers (ie 688/205)). Either of these approaches would have produced a more reliable estimate of future traffic flows than the methodology used in the Report.

Nevertheless, working with what we have the Report's methodology yields an estimated increase in traffic of 2,124vpd (ie 3,000 – 876). There appears to be an inconsistency in this

estimate, as when one adds generated traffic flows on Stuart St, Evans Cr and the new Site Access Road (delivering onto Captain Cook Cr), the only routes of access to access the site, gives at total of 3,100 vpd, slightly more than the calculated traffic flows of 3,000 vpd. How the consultants derived expected traffic flows on each of these streets is not clear. The allocation of traffic appears to take no account of likely direction. In the morning most traffic will be towards place of employment, which if in Belconnen, Civic, Barton/Parkes, or Woden would involve driving north and west along Canberra Av. Only if going to Tuggeranong (possibly) or the Airport (certainly) would one head either east on Canberra Av or south on Captain Cook Av. A more considered Traffic Assessment would have taken into account likely traffic destinations when estimating flows along various streets. These flows might differ significantly from current patterns given the differing demographics of the populations before and after the redevelopment.

The Report argues that traffic from the site along Stuart St will be less than that generated by the current dwellings because more vehicles will use the new Site Access Road mentioned above to access Captain Cook Av. If the Site Access Road were not constructed, which is TAMSD clear position (see above) then the traffic of 2,100vpd that road is planned to carry would have to be divided between Stuart St and Evans Cr. Allocating this additional traffic in the same ratio as currently generated traffic from the site (p18) would raise expected traffic loads by 1,400vpd to 4,750vpd on Stuart St (158% of capacity) and by 700vpd to 1,378vpd on Evans Cr (138% of capacity).

The Traffic Report does not consider a contingency without the Site Access Road, so its entire analysis of traffic flows is based on the assumption that it will be constructed. Even with the new road in place, traffic when leaving the site would only be able to drive southward. As we may expect half the traffic to wish to drive northward along Captain Cook to Canberra Av, it seems likely that either there would be delays as cars queue to do a U turn at Murray Cr traffic lights, or vehicles would leave the site via Stuart St and turn right at the Stuart St/Captain Cook intersection, or alternatively access Canberra Av via Evans Cr and Lefroy St. Similarly traffic approaching from the south along Captain Cook Av would not be able to access the site via the new access road and so would turn right into Stuart St at the Captain Cook/Murray Cr traffic lights.

Whether or not the Site Access Road is constructed, it seems highly likely that traffic flows along Stuart St will consequently be considerably larger than estimated. The Report concedes that Stuart St will exceed its design capacity of 3,000 vpd as a consequence of the redevelopment, but points out that at 3,350 vpd traffic on Stuart St is currently already above this level. Were only one third of the traffic currently expected to access or exit the site via the Site Access Road to use Stuart St, the additional 700 vpd would increase traffic on Stuart St to over 4,000 vpd. Similarly the study predicts traffic flows in Evans Cr as 678vpd, but an additional 700vpd diverted from the Site Access Road would increase this to 1,178vpd, 18% above Evans Cr's capacity of 1,000 vpd.

It would seem unduly hopeful to expect that the results of this increased level of traffic will not be noticeable to local residents, and TAMSD would seem to share this assessment. Nevertheless, even if the Report's rather optimistic conclusions are soundly based, it cannot be denied that adding an additional 2,000 plus vehicle trips per day to the area will have a significant impact on traffic flows.

Parking

Using the rules in the Parking and Vehicular Access Code the proposed development would be required to provide parking for 688 vehicles, which we may assume is the smallest estimate of the number of residents' vehicles that can reasonably be defended. In addition there would be a need for one visitor parking space for every four dwellings or 125 visitor parking spaces. At 30m² per car parking space the space requirements are consequently 24,390m², or about 96.6% of the total area of the redevelopment. Clearly car parking either underground or under building of some form will be required.

Unless basement car parking is restricted to being only under buildings most of the large Regulated Trees on site will have to be removed. This is because an underground car park would preclude deep rooted tree above unless special provision were made for areas of unusually deep soil beds. In a development of the size mooted it appears that a significant fraction of the site will have to be underlain by basement car parking, dramatically reducing the area available for deep rooted trees. There is a real possibility that if this is not managed well the entire site could become a concrete wasteland. This is likely to reduce the price received for the site – this might well be a case where less is more.

Given that the socio economic demographics of the residents after the redevelopment seem likely to differ from the current residents it may be that the allowance of one car park per one bedroom apartment and 1.5 parking spaces per two bedroom apartment may underestimate the need. If a large portion of the residents in these smaller apartments are younger couples where both partners work then there might be a need for almost two car park spots per bedroom. If the estimates of required parking spaces turn out to have underestimated the demand there may well be a significant increase in on street parking within easy access of the site say 300 to 400 metres from the site in surrounding streets. This would be inconvenient for existing residents of the area, workers at Manuka, and shoppers.

DEFINITIONS OF AREAS a, b, AND c IN RULE R21

We would suggest that the definitions of areas **a**, **b** and **c** in Rule R21 be replaced, either within R21 or elsewhere, with the following:

Area **a₁** is that area in Section 39 within 20 metres of the boundary frontage on Stuart St.

Area **a₂** is that area in Section 43 within 20 metres of the boundary frontage on Stuart St or within 20 metres of the boundary frontage on Evans Cr.

Area **a₃** is that area in Section 39 within 20 metres of the boundary frontage on Evans Cr.

Area **b₁** is that area in Section 39 within 52 metres of the boundary frontage on Captain Cook Cr and within 25 metres of the boundary with Block 1 Section 39.

Area **b₂** is that area in Block 2 or Block 10 Section 39 within 25 metres of the boundary with Block 1 Section 39, or within 25 metres of the boundary with Block 19 Section 39, but not within 30 metres of the boundary with Block 20 Section 39.

Area **b₃** is that area in Block 1 or Block 2 Section 43 not within area **a₃** as previously defined and the 860m² area of Block 5 Section 43 that EPD proposes to include within the redevelopment site (note that it would be really desirable for EPD to more clearly define the area which it wishes to incorporate before things proceed much further).

Area **c₁** is that area within any of Blocks 11, 12, 13, 14, 15, 16 or 17, Section 39, not already included in area **a₁** or **b₁**.

Area **c₂** is that area within either Blocks 2 or 10, Section 39, not already included in area **b₂**.

Area **c₃** is that area within either Blocks 8 or 9, Section 39, not already included in area **a₃**.