

Draft Southern Gateway Planning & Design Framework

July 2026

Yarralumla Residents Association Submission

The ACT Government has not provided a comprehensive case for the Draft Southern Gateway Planning and Design Framework (the Framework) nor demonstrated that it is viable. It is essential that there is a feasibility assessment, together with financial viability and the funding required and its sources.

A planning and design framework should be supported by a thorough, multi-disciplinary analysis, with baseline data to ensure that future development is viable and sustainable. The core components required comprise: feasibility and financial analyses; assessments of traffic and transport; land use mapping; utility capacity; hydrology risk; ecology and biodiversity; development viability; targets (population and density), phasing and funding. None of these are available.

The Framework presents a “vision to 2050” that combines a version of the 1912 Griffin Plan with the concept of transforming Adelaide Avenue-Yarra Glen from a major 6 lane arterial road to a vibrant, multimodal corridor spine that better connects to local neighbourhoods in Yarralumla, Deakin, Curtin and Hughes, with significant increases in housing density.

However, the constraints have not been assessed, and there has been no analysis of the feasibility or the costs to overcome major impediments.

Cumulative modelling of the Framework’s proposed densification, the impact of the Missing Middle reforms and major infill projects already underway in the suburbs, is essential to reveal the extent of future pressure on population, traffic, utilities, schools, trees and community infrastructure.

The scale of the costs and increases in rates and utility charges imposed on the community to fund the densification and associated civil infrastructure needs to be assessed and in the public domain.

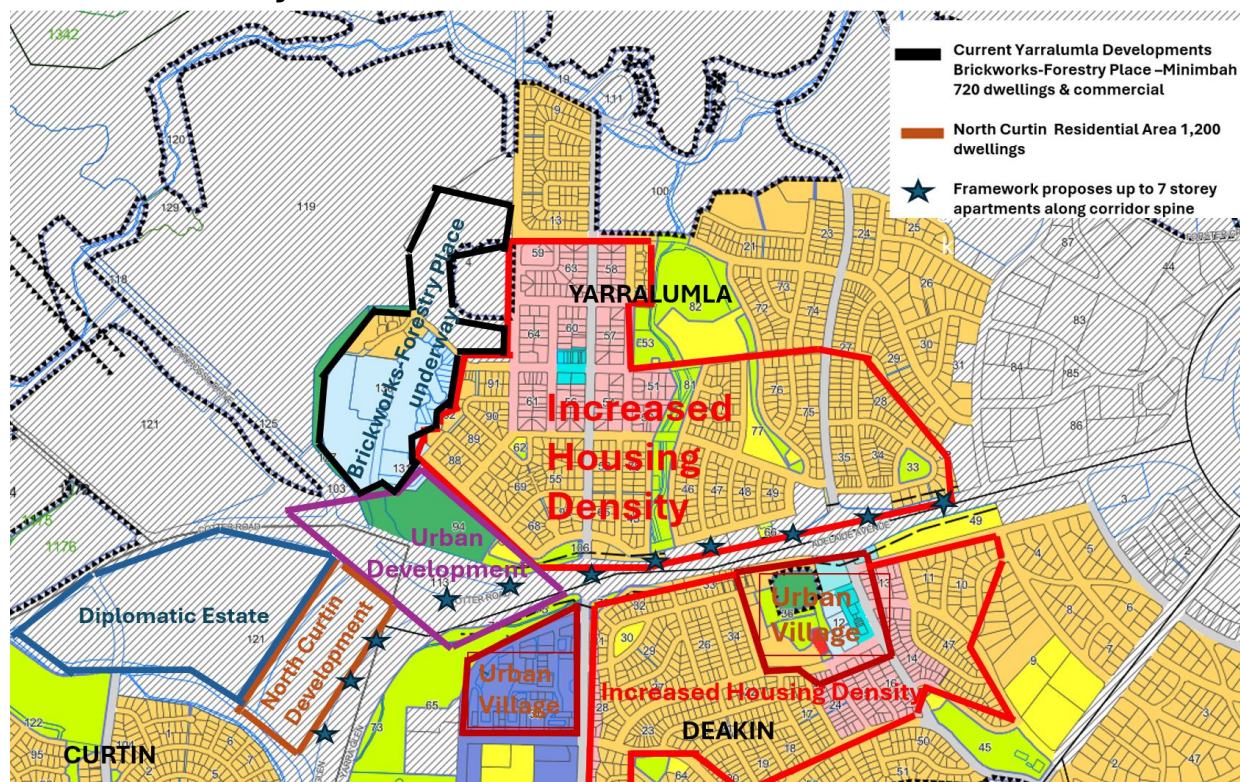
The Framework should not be approved nor changes to the National Capital Plan and Territory Plan made prior to the feasibility, viability, costs and funding required being fully assessed, and made available for public consideration.

The major issues and matters to be addressed are detailed below.

Matters to be Addressed

1. A comprehensive case for the Framework has not been provided. The Framework should not be approved nor changes made to the National Capital Plan and Territory Plan prior to the feasibility, financial and technical viability, costs, the funding required and its sources being assessed, and made available for public consideration.
2. The Framework's approach to turn a major arterial road into vibrant, multimodal corridor and local road is impracticable given that the road carries 49,500 vehicles per day (2023), the vast majority is through traffic and no other routes are to be provided.
3. Increasing housing density with mid-rise apartments (up to 7 storeys) close to the Adelaide Avenue-Yarra Glen spine is severely limited. The Diplomatic Precinct Areas in Yarralumla, Deakin and Curtin and the Deakin District Playing Fields are to be retained; schools and religious structures are unlikely to be demolished for redevelopment; and the Curtin Residential Area is already zoned for development. The topography is also a major constraint. Thus only 12% of the 4km of road frontage could be redeveloped to mid-rise dwellings.
4. No data is provided on proposed population increases associated with densification. Some context is provided in the District Strategies for Inner South and Woden which together show an increase in dwellings and population the equivalent of a new suburb being built each year to 2050.
5. The requirement for the Mint Interchange to address congestion and access on Adelaide Avenue-Cotter Road-Kent Street was identified in 2012. Postponing further investigation to beyond 2040 will see a threefold cost increase from the original \$104m to over \$285m and major increases in congestion.
6. The Missing Middle zoning changes allow for broad scale densification of the older suburbs in the absence of: targets, controls or caps on the numbers; civil infrastructure upgrades; or consideration of broader impacts such as traffic.
7. Ongoing loss of tree canopy cover is likely in the older suburbs as the Missing Middle "gentle densification" lacks controls on its extent. The tree canopy cover has declined to 28% in Yarralumla in the last 5 years, with decline also in Deakin, Curtin, Hughes and Garran. The ACT Government's tree canopy target of 30% in each suburb by 2045 is unlikely to be delivered.
8. Many areas identified for infill are known to have significant viable populations of endangered species and communities, including Natural Temperate Grassland and Golden Sun Moth. Ecological constraint mapping is essential and statutory environmental assessment under both the *Environment Protection and Biodiversity Conservation Act (Cth) 1999* and ACT legislation.
9. Construction on or adjacent to Yarralumla Creek along Yarra Glen is proposed. This area is a known high risk flood plain, as was demonstrated by the severe February 2026 flooding and associated damage. Construction would be a high cost, technically challenging approach and unlikely to be viable.
10. The civil utility infrastructure in the Framework area is already at capacity. The upgrades required will be a significant impost on the community being most likely funded via water, sewerage and electricity charges and rates increases.
11. Cumulative modelling of the Framework's proposed densification, the impact of the Missing Middle reforms and major infill projects already underway is essential to reveal the future pressure on population, traffic, utilities, schools, trees and community infrastructure.
12. An independent cumulative heritage, landscape and visual-impact assessment is required of the Framework's impact on the Adelaide Avenue approach route to Parliament House under the National Capital Plan.

Southern Gateway Framework and Yarralumla



Composite diagram compiled from Draft Southern Gateway Planning & Design Framework Figures 5, 19 & 23 & ACTMAPi Territory Plan map

1. Adelaide Avenue arterial to vibrant, multimodal corridor and local road

The Framework considers that Adelaide Avenue-Yarra Glen is a high speed motorway that creates a barrier for pedestrians and cyclists and that it should become a vibrant multimodal corridor and local road. (Note Yarra Glen is referred to as “Yarra Glen Drive” 23 times in the Framework Document indicating a lack of local Canberra knowledge).

This approach does not take into account that Adelaide Avenue is a 6 lane arterial road that carries 49,500 vehicles per day (vpd) (2023), the vast majority of which is through traffic and just 3% is heavy vehicles. Pedestrians and cyclists safely cross the motorway via the Hopetoun Circuit underpass, and the Kent and McCulloch Street bridges. The motorway already provides on-road cycle paths. The route carries through traffic to and from Civic, Woden, Tuggeranong and Molonglo.

The Framework proposes to change this major arterial road into a multi modal transport corridor through: the construction of just three public transport stops in Light Rail Stage 2B; minimising commercial through traffic by unstated measures; and implementing large vehicle restrictions on traffic that comprises just 3% of existing traffic. No new major road infrastructure is proposed.

Given that Light Rail stage 2B Draft EIS estimates a reduction in traffic by the project of only 10% over time; only 3% of traffic is heavy vehicles; no new major road infrastructure is proposed; and no additional local access to the thoroughfares is planned, where are current 49,500 vpd of through traffic to go?

The Framework’s approach to turn a major arterial road into vibrant, multimodal corridor and local road is impracticable given that the road carries 49,500 vehicles per day (2023), the vast majority is through traffic and no other routes are to be provided.

2. Densification along Adelaide-Avenue-Yarra Glen

The Framework has not provided data or assessed land use for the road frontage to Adelaide Avenue-Yarra Glen and its availability and suitability for densification. An assessment of existing land use using ACTMAPI and other publicly available information demonstrates major constraints that preclude any substantive densification along this route. Indeed any densification is limited to just 12% of the road frontage which is insufficient to deliver a vibrant multi modal corridor.

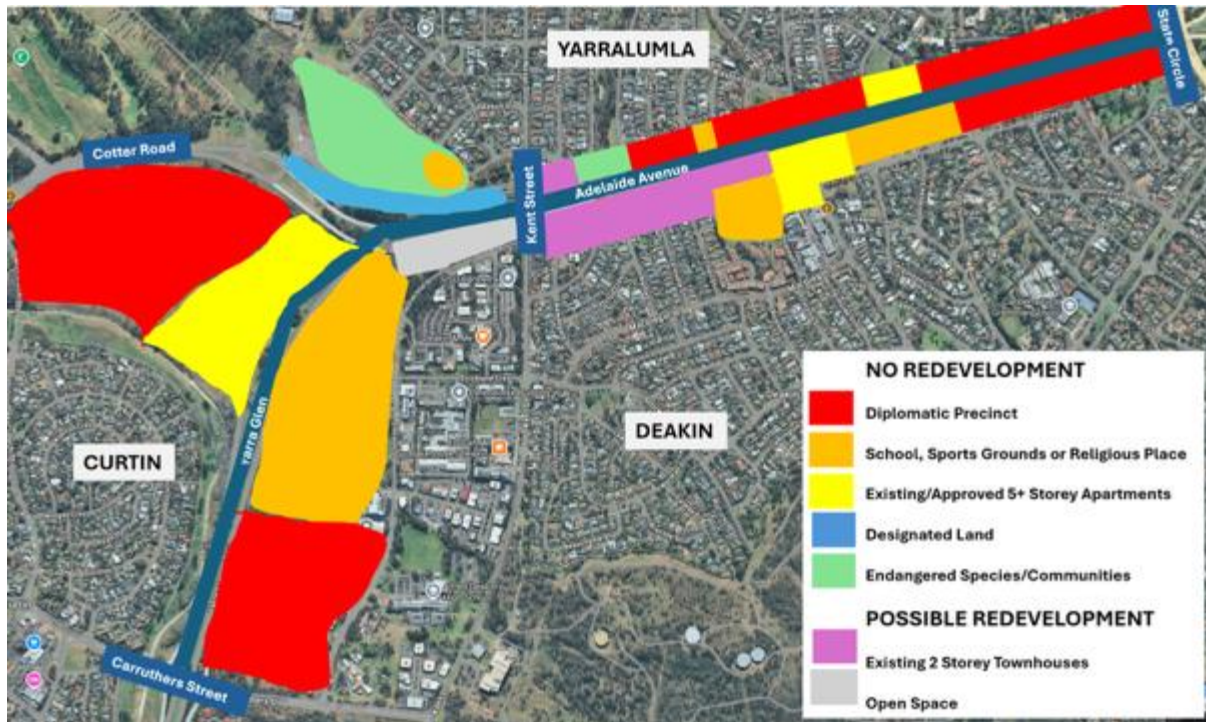
The topography is also a major constraint as Adelaide Avenue -Yarra Glen is a sunken, freeway-grade cutting with a 6% gradient, where the main roadway sits significantly lower than the surrounding terrain. Because of this design, the edges of the corridor form vertical walls or steep embankments that "drop off" directly down to the traffic lanes below. This presents a major impediment to densification.

The land use analysis shown in the figures below demonstrates that there is little opportunity for mid-rise densification along the southern or northern sides of Adelaide Avenue-Yarra Glen, from National Circuit to Carruthers Street, without demolishing and redeveloping diplomatic estate structures, schools and school facilities, religious structures and residences. This is shown in the table below. The Framework however excludes changes to Diplomatic Estates in Yarralumla, Deakin and Curtin; and the Deakin District Playing Fields are to be retained and enhanced. These areas form a significant proportion of the land, and it seems unlikely that schools and religious structures would be demolished for redevelopment to occur. The Curtin Residential Area is already zoned for development. Thus only 12% of the 4km of road frontage could be redeveloped.

LAND USE -Current built structures along Adelaide Avenue from State Circle to Kent Street limit scope for mid-rise redevelopment of up to 7 storeys	
Southside Adelaide Avenue	Northside Adelaide Avenue
The Lodge	Embassy of the Philippines
Residence of the Ambassador of Italy	Embassy of Sweden
Italian Embassy	Royal Thai Embassy
Canberra Girls Grammar School & playing fields	Embassy of Japan
Canberra Girls Grammar School Playing Fields	Hampton Court Apartments (50 dwellings up to 5 storeys)
Embassy Residences (114 dwellings & 6 storeys under construction)	High Commission of Sri Lanka
Ambassador Apartments (6 storeys)	Embassy of Saudi Arabia
Townhouses Newdgate Street (46 Blocks)	Nigerian High Commission
	Canberra House of Prayer (Presentation Sisters Convent)
	Yarralumla Diplomatic Precinct Block
	Block 21
	Grassland a& Golden Sun Moth habitat (Zoned RZ1)
	5 Kintore Crescent (8 Townhouses 3 storeys)
LAND USE-Yarra Glen from Kent Street to Carruthers Street development is limited to the proposed Curtin Residential Area	
Southside Yarra Glen	Northside Yarra Glen
Open space	Designated Land -Road Reserve
Deakin District Playing Fields	North Curtin Residential Area
Deakin Diplomatic Precinct	Curtin Suburb

Increasing housing density with mid-rise apartments (up to 7 storeys) close to the Adelaide Avenue spine is severely limited. The Diplomatic Precinct Areas in Yarralumla, Deakin and Curtin and the Deakin District Playing Fields are to be retained; schools and religious structures are unlikely to be demolished for redevelopment; and the Curtin Residential Area is already zoned for development. Thus only 12% of the 4km of road frontage could be redeveloped to mid-rise dwellings.

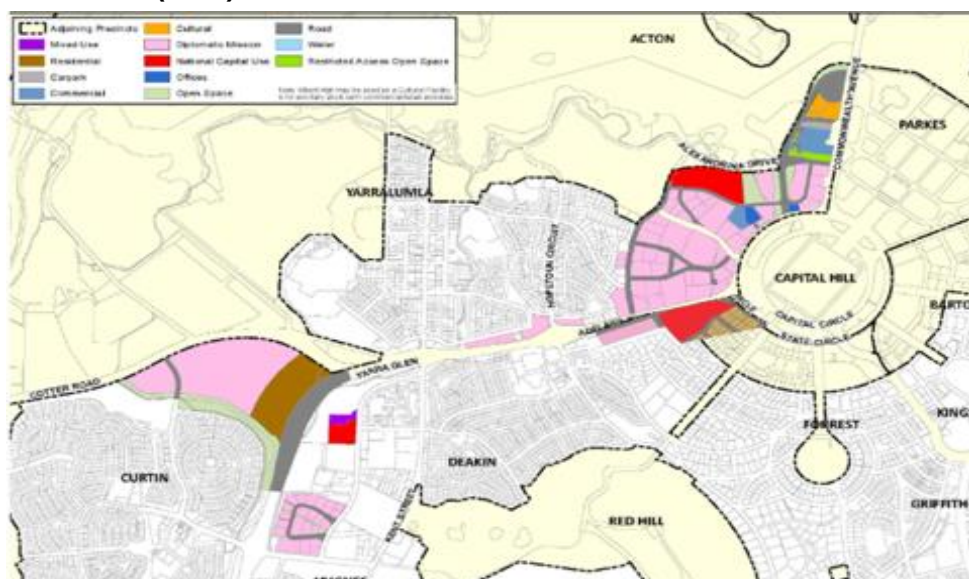
Adelaide Avenue-Yara Glen Land Use-Redevelopment practicable only in purple & grey areas



Adelaide Avenue-Yara Glen- redevelopment is practicable in only 12% of frontage



Diplomatic Precincts (Pink)



3. Scale of Population Increase

The District Strategies for the Inner South and Woden provide some indication of the extent of the proposed densification and infill. The Canberra's Living Infrastructure Plan 2019 population estimates show a similar increase. The District Strategies for Inner South and Woden together show an increase in dwellings and population the equivalent of a new suburb being built each year to 2050.

District Strategy	New dwellings to 2050	Population increase to 2050	Dwelling increase per annum	Population increase per annum
Inner South	13,500	33,750	540	1,350
Woden	23,000	58,750	920	2,350
Totals	36,500	92,500	1,460	3,700

No data is provided on proposed population increases associated with densification. Some context is provided in the District Strategies for Inner South and Woden which together show an increase in dwellings and population the equivalent of a new suburb being built each year to 2050.

4. Road Infrastructure

An assessment of road infrastructure requirements now and a plan for funding is essential. Constructing roads and intersections after major redevelopment has occurred limits the options available and greatly increases costs. The prime example in the Framework is the proposal to investigate the “Mint Interchange” in the longer term. The need for this interchange was established 14 years ago in the 2012 AECOM feasibility study to address existing severe congestion on Adelaide Avenue-Cotter Road-Dudley Street-Lady Denman Drive-Kent Street.

The delivery of this essential requirement remains unresolved and investigation is being delayed by a further 15 years, and possible construction by 20 plus years. Hence a study will be completed some 30

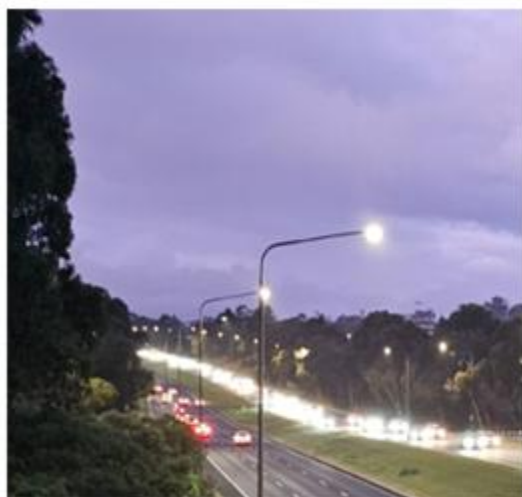
years after the need was first identified - by which time the Light Rail Stage 2B and the development of the North Curtin Residential Area and Diplomatic Estate will severely limit the viability of construction. The cost of the Mint Interchange was estimated by AECOM and SMEC at \$104m in 2013. Estimates of future costs based on CPI and construction industry costs show this to be at least \$175 in 2026 and \$285m in 2040.

The requirement for the Mint Interchange to address congestion and access on Adelaide Avenue-Cotter Road-Kent Street was identified in 2012. Postponing further investigation to beyond 2040 will see a threefold cost increase from the original \$104m to over \$285m and major increases in congestion.

Real time traffic congestion State Circle, Adelaide Avenue to Cotter Road PM Peak 28 April 2026



PM Peak Congestion Adelaide Avenue and Cotter overpass & AM Peak Congestion Cotter Road at Dunrossil Drive 14 July 2026



5. Densification of Yarralumla

The Framework identifies the majority of Yarralumla for future densification from Adelaide Avenue in the south to Brown and Schlich Streets in the north– but no numbers, targets, controls, caps or timeframes are given.

Area for future densification (purple shading)



Without data on the extent of densification in terms of number of dwellings or population, it is impossible to gauge the civil infrastructure requirements, increased traffic, loss of open space and biodiversity, tree canopy cover loss, and heat island effects.

Missing Middle changes to the RZ1 and RZ2 Zones in the Territory Plan that came into effect in June 2026 already provide for densification to occur, with no further planning changes required.

The majority of Yarralumla is zoned RZ1 and restrictions have been removed so that duplexes, triplexes, or townhouses are allowed on blocks previously restricted to single detached homes. Heights now allowed are two storeys (plus attic). There are no longer strict minimum block sizes for additional dwellings so blocks can be subdivided or consolidated to support multi-occupancy builds. In the RZ2 zone surrounding the Yarralumla Shops (Bentham Street) the zoning now provides for terrace houses and apartments up to three storeys (plus attic), and sometimes higher, to be built. The “gentle densification” Missing Middle reforms have thus created a substantially greater development capacity across Yarralumla.

The Missing Middle zoning changes allow for broad scale densification of the older suburbs in the absence of: targets, controls or caps on the number; civil infrastructure upgrades; or consideration of broader impacts such as traffic.

6. Tree Canopy and Climate Impacts

The proposed densification cannot occur without major loss of both public and private open space, biodiversity loss, and the creation of heat islands. The tree canopy cover was over 30% in 2020 in all the suburbs except Curtin at 26%. There has been a decline in cover in all these suburbs in the 5 years since.

Percentage Tree Canopy Cover by Suburb			
Suburb	2020	2025	Difference
Yarralumla	30.72	28.64	2.08
Deakin	34.24	33.02	1.22
Curtin	26.35	26.24	0.11
Hughes	32.63	31.19	1.44
Garran	32.63	31.16	1.47

The tree canopy target is formally stated in Canberra's Living Infrastructure Plan Cooling the City (2019). The *Urban Forest Act 2023 (Jan 2026)* provides legislative support to the tree canopy cover target in the objects of the Act:

- a) to support a resilient and sustainable urban forest that contributes to community wellbeing in a changing climate; and
- b) to protect and enhance the urban forest by recognising its value, including its cultural and heritage value; and
- c) to contribute to biodiversity in urban areas; and
- d) to support a target of the tree canopy covering 30% of the Territory's urban areas.

Ongoing loss of tree canopy cover is likely in the older suburbs as the Missing Middle "gentle densification" lacks controls on its extent. The tree canopy cover has declined to 28% in Yarralumla in the last 5 years, with decline also in Deakin, Curtin, Hughes and Garran. The ACT Government's tree canopy target of 30% in each suburb by 2045 is unlikely to be delivered.

7. Biodiversity

The Framework must be able to satisfy the requirements of the *Environment Protection and Biodiversity Conservation Act 1999 (Cth)* on matters of National Environmental Significance in regard to listed endangered species and communities, and comply with the ACT legislation. However all the "underutilised" land identified for future development in Yarralumla has critically endangered species and communities.

In particular the area in the Framework termed "West Yarralumla" is Natural Temperate Grassland that has been listed as a Critically Endangered category in the ACT Threatened Ecological Communities List under the *Nature Conservation Act 2014*. Less than 5% of the ACT's original Natural Temperate Grassland remains. This area is also the habitat of a viable population of the threatened species Golden Sun Moth (*Synemon plana*) whose populations have reduced, and are highly fragmented, there being 125 known sites throughout its range post-1990. This includes 32 in the ACT where majority of these populations do not exceed 5 hectares in area.

The “West Yarralumla” area was specifically excluded from the final Old Canberra Brickworks development in 2015 precisely because of these protected species and that the open space with the Old Uriarra track is highly used for recreation by the community.

Similarly the Curtin Diplomatic Precinct and North Curtin Residential Area developments are on land with significant viable endangered ecological communities and have not been assessed for compliance with the *EPBC Act*.

There should also be analysis to evaluate ecological connectivity, native flora/fauna pathways, and impacts on regulated, protected trees as per the *Biodiversity Sensitive Urban Design Guide*.

Many areas identified for infill are known to have significant viable populations of endangered species and communities, including Natural Temperate Grassland and Golden Sun Moth. Ecological constraint mapping is essential and statutory environmental assessment under both the Environment Protection and Biodiversity Conservation Act (Cth) 1999 and ACT legislation.

Yarralumla & Curtin Endangered Species and Communities

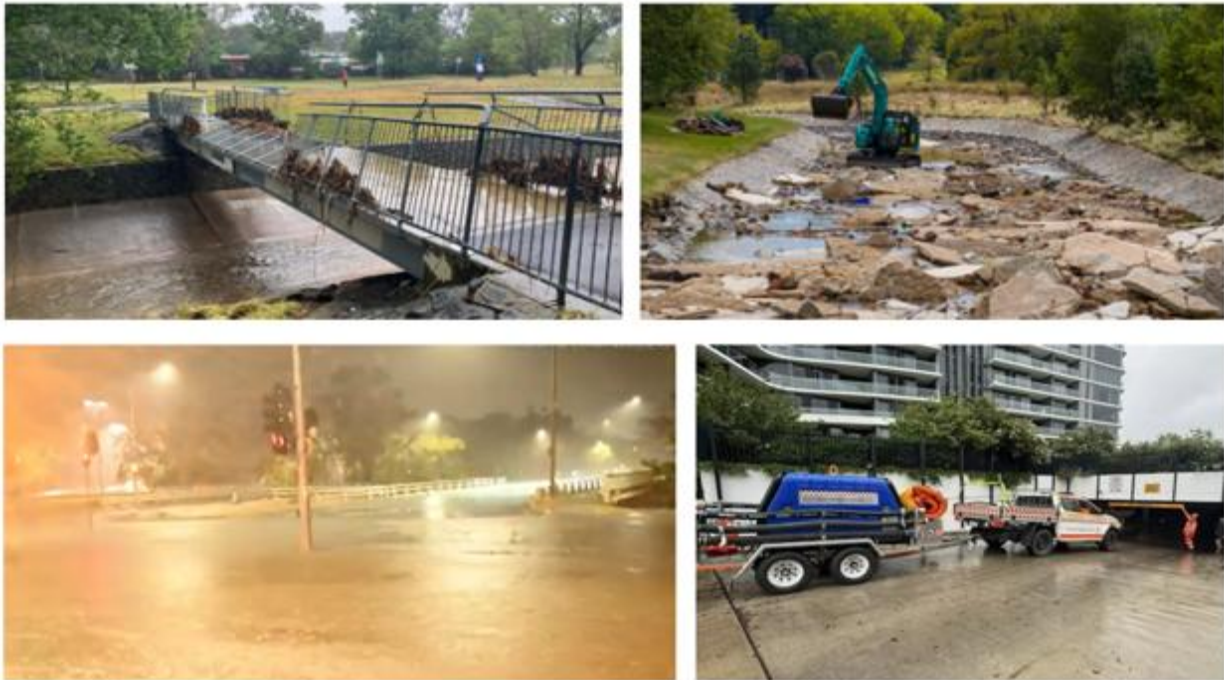


8. Hydrology Risk

Flood plain risks and strict stormwater runoff modelling is essential to assess technical and economic feasibility of building in the proposed areas and who will bear the cost. This is particularly important in regard to Yarra Glen redevelopment. The western side of Yarra Glen is abutted by the flood zone of Yarralumla Creek. The hydrology risks, technical difficulties and huge engineering costs of building high rise apartments in this area were demonstrated 6 months ago. Heavy rain in February 2026 caused major flooding of Yarra Glen, the Ivy apartments (280 dwellings and 16 storeys) at the Woden Roundabout, and took away half of the Curtin pedestrian bridge and half of the storm water culvert concrete walls.

Construction on or adjacent to Yarralumla Creek along Yarra Glen is proposed. This area is a known high risk flood plain, as was demonstrated by the severe February 2026 flooding and associated damage. Construction would be a high cost, technically challenging approach and unlikely to be viable.

Yarralumla Creek – Yarra Glen Flood damage February 2026



9. Utility Capacity

The areas slated for densification are all older suburbs whose civil infrastructure has not seen major upgrades in 70 years. Water, Sewers, Stormwater, Roads, Electricity are generally at capacity and would not be able to cope with the envisaged scale and rate of densification.

There has been no assessment of future needs for these utility services nor how they will be funded. Apart from roads all of these facilities are provided by corporate entities and new and upgraded infrastructure funded through charges to users. This will be a significant impost on the community to fund major upgrades through their water, sewerage and electricity bills. The community need to understand the quantum of these costs and whether they are acceptable.

The civil utility infrastructure in the Framework area is already at capacity. The upgrades required will be a significant impost on the community being most likely funded via water, sewerage and electricity charges and rates increases.

10. Cumulative Impacts

The cumulative impact of densification on the suburbs has not been assessed. There are currently a number of major infill projects underway in Yarralumla and adjacent areas. These include the Old Canberra Brickworks development of 380 dwellings plus commercial; Forestry Place 300 dwellings plus 100 independent living units and commercial, and the Minimbah Court redevelopment is 30 social

housing units; the adjacent Curtin Residential Area is a further 1,200 dwellings. This is already a total of 2,100 dwellings and in addition there is the Curtin Diplomatic Estate.

The Framework should assess the combined effect of infill already committed and underway and that of the Southern Gateway Framework densification, and that from the Missing Middle reforms, North Curtin Residential Area and Diplomatic Estate. This cumulative modelling will reveal the future pressure on population, traffic, utilities, schools, trees and community infrastructure.

Cumulative modelling of the Framework's proposed densification, the impact of the Missing Middle reforms and major infill project already underway is essential to reveal the future pressure on population, traffic, utilities, schools, trees and community infrastructure.

11. Heritage and the National Capital Setting

Adelaide Avenue is designated as a main avenue and approach route under the National Capital Plan (4.15 Main Avenues And Approach Routes Precinct Code). As such Adelaide Avenue is subject to special requirements and development controls to protect its monumental character and landscape quality as a primary gateway to the Parliamentary Triangle. Given this role of Adelaide Avenue and its relationship to the Griffin composition, an independent cumulative heritage, landscape and visual-impact assessment is required. This should cover views to and from Parliament House, landscape buffers, building mass, ridgelines, night lighting and coordination with the National Capital Authority.

Main Avenues And Approach Routes National Capital Plan



An independent cumulative heritage, landscape and visual-impact assessment is required of the Framework's impact on the Adelaide Avenue approach route to Parliament House under the National Capital Plan.

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