

2021/8937 – Forestry Place Redevelopment of CSIRO Yarralumla, Block 7 Section 4 Yarralumla

Heritage Values

The site includes two places listed on the Commonwealth Heritage List. The CSIRO Forestry Precinct (ID 105595) and the Australian Forestry School (former) (ID 105426). The first listing includes the whole of Block 7 Section 4 Yarralumla including all buildings, arboretum, nursery and tennis courts.

It is recognised for its:

- Processes associated with the establishment of a national forestry school demonstrating both the Commonwealth's interest in scientific endeavour and a vision for Canberra as a location for science as well as government administration
- Research as an important reference site for experimental tree planting and genetic research
- Aesthetic characteristics based on all of its buildings set in the mature forest plantings of Westbourne Woods arboretum
- Technical achievement as a complete small-scale research and learning institution
- Social value to the former students and the forestry scientists who conducted research
- Significant people associated with the pioneers of forestry research in Australia.

The Australian Forestry School is recognised for its role in the early development of the Federal Capital and reflecting the Commonwealth's role in establishing a national forestry school in response to Federation. It has significant architectural merit set within a formal landscape setting and has important social value for former students and has strong associations with several leading figures of early research into Australian forestry.

National Capital Plan

The site is included in the Lake Burley Griffin Foreshores Precinct which is part of the National Capital Open Space System (NCOSS). The objective of NCOSS is to protect the nationally significant open-space framework, visual backdrop and landscape setting for the National Capital.

One of the policy objectives for the Lake Burley Griffin Foreshores is that they should remain predominantly as open space parklands while providing for existing and additional National Capital and community uses.

The site has also been classified as a Designated area under the National Capital Plan (NCP) meaning it has the *'special characteristics of the National Capital'*. In particular, its association with Canberra's national functions, the incorporation of the Lake and its foreshores into the Griffin's design plan and the landscape setting providing a garden city image of national and international significance.

Under the NCP the site is zoned Community facility which includes Scientific Research Facility. Dwellings and a hotel are not permitted uses on the site. The developer has applied to the National Capital Authority (NCA) to allow such use but there is no certainty this will be approved.

The site is important enough to have been given special status under the NCP to protect its landscape and heritage associations.

Proposed Action

The proposed action involves the total redevelopment of the site including the construction of all the following:

- 300 apartments of between 2 and 5 stories
- a 130 bed aged care facility
- a new hotel accommodation block.

Additional roads, pathways, parking areas will also be required. As will electrical, stormwater sewer, communications and other infrastructure.

Built Elements

The proposed action involves the demolition of 12 out of the 16 buildings currently located in the precinct, including the Caretakers Cottage (Building 5) plus the CSIRO Divisional Headquarters (Building 1) and the Controlled Environment Building (Building 3).

Impact

The Heritage Impact Assessment (HIA) notes the impact on the heritage values of the site by the removal of so many buildings. For example:

- *The total removal of the Caretakers Cottage (5) is considered to have a severe impact on the site's overall CHL values. (HIA p94)*
- *[Development] will increase the current built footprint with the site, alter its forestry setting and diminish the evidence of both (sic) the CSIRO use of the site (Referral 4.1)*
- *The proposed action will increase the built footprint and alter the forestry research setting which in itself poses a severe risk to the site's identified heritage values (HIA p 69)*
- *The proposed action will also involve the total removal of a number of low significance structures and the removal of a number of low to moderate significance (sic) landscape elements which will result in a significant cumulative impact to the Site's overall CHL values. (HIA p 69)*

Comment

YRA agrees with the proponent that a number of the buildings in the precinct slated for demolition contribute to the site's overall heritage values and considers the removal of 75% of the existing buildings will have a significant and permanent impact on the heritage values of the site.

YRA agrees with the heritage impact assessment that the removal of the Caretakers Cottage, in particular, will result in a severe impact on the CHL values of the site.

The CSIRO Divisional Headquarters Building and the Controlled Environment Building are also an important part of the history of the site during the CSIRO/Forestry Research era which followed on from the Forestry School era. These buildings are specifically included as attributes in the CHL listing of the CSIRO Forestry Precinct in recognition of the role they played in forestry research.

The social value of these buildings to forestry scientists who worked in them is also specifically recognised as one of the heritage values of the precinct.

YRA also questions the proponent's claim that the proposed development will only result in a 40% built envelop on the site. The new apartments and hotel accommodation will spread over 35 substantial apartment blocks. Furthermore, no allowance appears to have been made for road access to the apartment blocks in the south-west corner of the site nor for visitor or staff parking at the aged care centre.

The proponent claims new buildings will be *visually subordinate* to the tree-scape. However, the development requires the removal of large numbers of existing tall, mature trees and their replacement with new plantings of maybe 2 metres in height. It will take 20-30 years for any replacements to reach the height of the current trees.

In addition, given the south-west corner of the precinct is 15m higher than the Oval and Banks St on the eastern boundary, if apartments there are 12.5m in height as proposed, it would mean the apartment blocks are some 27.5m above Banks St and will dominate views from the Oval and Banks Street.

The mitigation measures proposed ie taking photographs and erecting interpretive signs is a totally inadequate response to the demolition of the buildings.

Subdivision

The EPBC guidelines note that establishing a new subdivision within a National Heritage place is *prima facie* likely to have a significant impact on the National Heritage values of that place. [Matters of national Environmental Significance - Information for Industry Sectors p33]

The scale of the proposed development represents 21% of the existing number of dwellings in Yarralumla and is estimated to increase Yarralumla's population by 33%. This is a major sub-division and will result in a significant impact on the heritage values of the site.

Inconsistent with surrounding land

Contrary to the EPBC guidelines the new development will be entirely inconsistent in terms of scale and design with the surrounding area which is overwhelmingly one and two storey detached single residential blocks and semi- detached town houses.

The interaction between the retained buildings and the new buildings is important in retaining the heritage values of the site. At present the existing buildings are located in a large landscaped, park like setting. Surrounded and hemmed in by a five story apartment building and aged care centre, even with a 20m setback, the retained buildings will be dominated by the new development.

Associated Infrastructure

The associated infrastructure shown on the masterplan such as such as internal roads, and car parking for staff and visitors is clearly insufficient to meet the requirement for on-site access. The Masterplan does not appear to show an access road for residents the in the south-west zone apartments. This will require the construction of additional infrastructure, further impacting on the heritage values of the site.

Landscape Elements

The proposed action involves the partial or complete removal of a number of significant tree plantings throughout the site to enable the construction of apartment buildings, including:

Group 1 Atlas Cedar partial removal

Group 3 Monterey Pines Partial removal
Group 4 Pine Oaks total removal
Group 6 Giant Sequoia total removal
Group 9 English Oak total removal
Group 12 Kurrajong Partial removal
Group 13 She Oak Partial removal
Group 14 Monterey Pines Partial removal
Group 16 Stone Pine Partial removal
Group 24 Not known total removal

Impact

The referral acknowledges the complete or partial removal of the tree cover will impact on the heritage values of the site. For example:

the partial removal of the Kurrajong (Group 12) and Pin Oak (Group 4) groups of significant trees will result in a reduction of the historic, representativeness and aesthetic values of the site (Referral 3.8)

The partial removal of the West Zone Kurrajong grouping (Group 12), and the total removal of the Pine Oaks in the South Zone (Group 4) is considered to have a moderate impact. Additionally, the partial removal of the North Zone Stone Pine group (Group 16), as well as the South Zone Atlas Cedar (Group 1) is also considered to have a moderate impact to the Site's overall heritage values. (HIA p70)

Comment

YRA is concerned that so much of the treescape will be removed and the park like setting destroyed and replaced by apartment blocks. These trees contribute significantly to the aesthetic, historical and social value of the site and is recognised as such in the CHL listing.

On the face of it, it looks like more trees will be removed than retained. YRA is concerned not only at the loss of individually important historical stands of trees but also at the cumulative effect that such mass removal will cause to the heritage values of the site.

Most of the tree removal is required because they are in the way of the construction of apartment buildings. This could be mitigated if the project were scaled back.

As noted earlier, it will be many years before any replacement trees reach the maturity of the existing canopy.

Golden Sun Moth

The proposed action will also involve the destruction of 0.56 ha of Golden Sun Moth (GSM) habitat which a survey of the site has confirmed are present. GSM is listed as critically endangered under the EPBC Act and under the EPBC Act a referral is a requirement.

Impact

The proponent acknowledges the proposed action has the potential to impact a Matter of National Environmental Significance (MNES) but says the population is so small and the long-term viability of the population is low, it is not a controlled action.

Comment

YRA notes that the extent of the habitat is 5% of the total area of site, which is not insignificant. In addition, YRA notes that GSM thrive in Chilean needlegrass as demonstrated on Dudley St in Yarralumla. There is therefore potential for the GSM population to actually thrive if the site is left undisturbed.

No mitigation measures are proposed either in terms of offsets or translocation.

Significant public interest

Given the threat/destruction to the heritage values of the site and the significant impact on the amenity and quality of life for current residents (involving a population increase of 33% and some 2000 additional vehicle movements per day) there is a great deal of public interest in this development proposal.

This proposed development is also in addition to the development at the adjacent brickworks site which involves a similar population increase. In total, the population of the suburb will increase by 2000 people or 70%.

The planned construction start date of July 2022 is also similar to the construction start date of the Brickworks Development. Construction of two major housing developments at the same time will be extremely disruptive and is a serious concern to residents.

Public confidence in the environmental assessment process is best served by having a transparent process that is open and public.

Factual errors

In response to the question in Section 8 of the referral the proponent has indicated that there is no feasible alternative to taking the proposed action. This is not correct. As the HIA demonstrates, the developer has explored a number of alternative development options including new scientific research use, educational uses or smaller scale development

In response to the question in Section 2.2 the proponent has indicated that the proposed action is not likely to have any direct or indirect impact on the values of any National Heritage Places. This response contradicts the statement under Section 1.2 which noted that the HIA found that the removal of significant contributory elements within the Site over the life of the proposed action will result in a significant cumulative impact on the site's overall CHL values.

Again, in response to the question in Section 2.7.1 the proponent has incorrectly indicated that the proposed action is not likely to have any direct or indirect impact on Commonwealth land.

Conclusion

The current zoning under the NCP is designed to protect the open parkland setting of the site. Hence residential apartment blocks and hotels are not permitted. Even though the proponent has applied to the NCA to permit such uses, there is no certainty this will be approved.

The EPBC guidelines (SIG 1.2) note that a significant impact is one that has **major** consequences for **important** aspects of the heritage values of places.

YRA considers the:

- removal of 75% of the existing buildings including the Caretakers Cottage and all of the buildings associated with the CSIRO era
- total or partial removal of significant stands of trees (Group 1,3,4,6,9,12,13,14,16 and 24)
- total destruction of the golden sun moth habitat (5% of the site)
- the construction of 300 multi storey apartments spread over 35 blocks, a hotel and a 130 bed aged care centre resulting in a much larger building footprint plus the associated internal roads, footpaths and parking facilities

will totally remove all evidence of the CSIRO research use of the Site, destroy an intrinsic and visually connected part of the Forestry School (Caretakers Cottage) and irrevocably alter the site's landscaped forestry setting. These actions will have major and irreversible consequences for the important heritage and environmental values associated with the site and should be considered as a controlled action and subject to a full assessment under the EPBC Act by an Environmental Impact Statement or Public Environment Report.

It is also important to recognise that the whole of the Forestry Precinct is heritage listed and it is how the buildings and landscape come together to create a whole that is greater than the sum of its parts. Removing, altering or diminishing elements of the buildings or landscape extinguishes the whole. For example, one of the key features of the site, recognised in the heritage listing, is how the site combines significant forestry educational and research buildings in a parklike landscaped setting that that work together to tell the story of the history of the site. Remove buildings from the CSIRO period or historical plantings and you lose the narrative of the place.

Similarly, it is important to recognise the cumulative impact of all of the individual actions involved in the proposed development. Taken together, the site will be unrecognisable and the heritage values lost forever.

There is common agreement, including from the proponent, that the proposed action will have an impact on one or more of the heritage values of the site. For example, the proponent notes ... *the HIA found that the removal of significant contributory elements within the site over the life of the proposed action will result in a significant cumulative impact on the Site's overall CHL values.* (Referral Section 1.2)

However, the proponent asserts that their mitigation measures will be sufficient to ameliorate the loss of these heritage values.

The question is whether the mitigation measures proposed by the developer such as taking photographs, tree planting and interpretive signs are sufficient to preserve the heritage values of the site. YRA does not consider the proposed mitigation measures are sufficient. For example, the referral is silent on mitigation measures for the GSM and photographs of the Caretakers Cottage are no substitute for the real thing. In YRA's view, only a full assessment under the EPBC Act involving an Environmental Impact Statement or Public Environment Report can resolve this issue.

The referral contains a number of errors and omissions, most importantly the proponent states (Section 8) that there are no alternatives to the proposed action. This is not the case. The proponent has identified a range of alternative uses for the site, as outlined in the HIA, or could scale back the proposed development.

YRA also considers that there are other issues either glossed over or omitted from the referral which require further examination as part of a full assessment. For example, the heritage values of the Divisional HQ building and laboratories and the Controlled Environment Building are acknowledged

as an important part of the CSIRO story and the people who worked there and its role in forestry research and that their loss will result in the Commonwealth Heritage values being “notably obscured”. However, the buildings are still slated for removal.

The nature and scale of the infrastructure associated with the proposed development and the consistency of the proposed development with the use of the adjoining land are also not adequately addressed.

As there is a great deal of public interest in the referral, it is important that the public has confidence in the EPBC process, and this requires the proposed action to be classified as a controlled action and have a full, open, transparent and public assessment by an Environmental Impact Statement or Public Environment Report.

Michael Lewis
President YRA

info@yarralumlaresidents.org.au

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