

P&E Committee Secretary  
Legislative Assembly for the ACT  
GPO Box 1020  
CANBERRA ACT 2601

**Notification of Submission  
Draft Variation to the Territory Plan  
No. 257 – Suburb of Crace, Gungahlin**

Dear Sir/Madam

We wish to make submissions in relation to the development of the suburb of Crace, as proposed in Draft Variation No. 257 (“the Variation”).

**Background**

We have been residents of Palmerston since the Gungahlin development commenced some 15 years ago, and therefore present our ideas as concerned residents with a love and care for the area, and not as developers seeking financial advantage nor as non-resident bureaucrats to whom it is perhaps just one more set of lines on the page. We feel entitled to speak with some experience of the results of development in the area.

**Totality of Design**

Our submission is not about the streets and paving of the new suburb, but it is about the impact it makes as one enters the township of Gungahlin; Crace adjoins Gungahlin’s main street. Too frequently, since land release and development was privatised, residents have been forced to accept the terms “cheaper” and “faster” and “narrower” at the expense of the concept created by Walter Burley-Griffin and espoused in the greenescapes and wider roads on the other side of the Barton Highway.

The Barton Highway and Gundaroo Drive intersection adjoins the suburb of Crace, and forms the entrance to the township. The development of Crace is a one-off opportunity to create a “first impression” of which the people of Gungahlin and the whole ACT may be proud. Through the words of Variation 257 it is easy to see that the members of the Standing Committee have sought to conceptualise the small things that meld together to create the whole that would be Crace. In the same way, we would challenge the members to also conceptualise outside the boundaries of this development and realise that Crace is an integral part of a township; it does not stand alone.

**The Submissions**

We have set out concepts that will go some way towards (a) improving the access to and outward appearance of Crace and (b) improving that first impression of Gungahlin township. Our submission and recommendations do not seek to address the whole suburb, but they do address areas of concern that are already apparent even to us mere mortals in the ‘burbs.

There are four main issues. Each issue is equally important, yet they have a relationship with the others and so are presented in a sequence that follows that relationship; no single part stands alone and each affects the others. The recommendations that accompany each issue are therefore numbered sequentially through the four parts.

With the exception of Part A, our submissions build upon concepts already defined in the Variation. We applaud many of the concepts set out in the Variation and, in fact, some of our observations and recommendations may seem to reiterate concepts already espoused in the Variation. However, with the benefit of local knowledge, we have taken those concepts a bit further.

The four issues addressed in this submission are:

**PART A GUNDAROO DRIVE**

- A1 Background**
- A2 Pre-existing congestion**
- A3 Barton Highway roundabout**
- A4 Relief by the GDE**
- A5 Access to the Crace construction site**
- A6 Options**
- A7 Recommendations 1-3**

**PART B NUDURR DRIVE**

- B1 Background**
- B2 Variation 257 usage**
- B3 Impact upon neighbouring Palmerston**
- B4 Options**
- B5 Recommendations 4-5**

**PART C OFF-LEASH AREAS AND NEIGHBOURS**

- C1 Background** (*inc. Attachment 1*)
- C2 Existing facilities** (*inc. Attachment 2*)
- C2 The dilemmas**
- C3 Options**
- C5 Recommendations 6-7**

**PART D FAUNA AND FLORA**

- D1 Background**
- D2 Variation 257 principles and policies**
- D3 Fauna and flora in Crace** (*inc. Attachment 3*)
- D4 Fauna and flora in neighbouring areas**
- D5 Recommendations 8-11**

Our submission is one of totality, of subsequent benefits and of potential consequences for Crace and for the township of which it forms a part. The sequence of issues and recommendations builds on these benefits and consequences.

Thank you for the opportunity to present our findings.

Garry Newton  
27 March 2006

Jo Newton  
27 March 2006

## **PART A - GUNDAROO DRIVE**

### **A1. Background**

When Gungahlin first opened we were serviced by a single-lane road that ended at the northern corner of Palmerston and continued on as a gravel farm track. Then, a few years later, we suffered months of further massive inconvenience as the ACT government widened that Gundaroo Drive **from a single-lane road to a single-lane road**, speling that residents didn't deserve better but that it would be upgraded once the population reached around 20,000.

*Comment: The 2001 census put the population of Gungahlin (postcodes 2911, 12, 13 and 14) at just under 12,000 people. The ACT government is proud to trumpet that Gungahlin is the fastest growing area in Australia, so they knew what was coming. We are already well past that mark and approaching 30,000.*

### **A2. Pre-existing congestion**

As has been happening for over 10 years, the normal commuter flow on Gundaroo Drive causes traffic to regularly bank up on workday morning for the 1.4 kilometres from the Barton Highway to Nudurr Drive in Palmerston.

Then, each workday evening, the traffic flow is again heavy and, interestingly, either dangerously fast or a bumper to bumper crawl from the Soccer Club at Mackellar through to Mirrabei Drive.

The situation is further exacerbated when a single tractor or mower or other slow moving service vehicle needs to use the road, which is not uncommon. At all times, the single-lane structure of this major thoroughfare is shameful and dangerous.

*Comment: It is a fact known to the residents of Gungahlin that a single-lane Gundaroo Drive is already inadequate for the size of Gungahlin's population.*

### **A3. Barton Highway roundabout**

The roundabout at the Barton Highway and Gundaroo Drive intersection is seen by many as the cause of the traffic congestion on Gundaroo Drive. Given that the ACT government has put almost all of its eggs into the basket called the Gungahlin Drive Extension (GDE), then one must concede that they are neither able nor willing to upgrade this roundabout.

*Comment: If the congestion on Gundaroo Drive is to be relieved, then the only remaining option is to address Gundaroo Drive itself.*

### **A4. Relief by the GDE**

In relation to the Crace development, the proposition that the Gungahlin Drive extension (GDE) will solve all our traffic woes fails on a number of counts. Yes, it will relieve traffic heading for Woden and beyond, but it will not relieve traffic heading for Belconnen or Civic or parts in between. Neither will it address the natural bottleneck at the Barton Highway roundabout.

- The most direct route to Belconnen for most Gungahlin residents is along Gundaroo Drive.
- The most direct route to north-western Canberra for most Gungahlin residents is along Gundaroo Drive.

- The most direct route to the Barton Highway for most Gungahlin residents is along Gundaroo Drive.

Regardless of claimed traffic numbers on the GDE, the construction of a suburb along a major arterial route that is single-lane road (i.e. Gundaroo Drive) will be a shameful indictment on the government. It will also continue the trend of the ACT “planning” being seen as knee-jerk and reactionary and a laughing stock to the rest of Australia.

*Comment: Regardless of in which direction Gungahlin residents go to work, more people already use Gundaroo Drive (and the roundabout) than the road can cope with. Since Gungahlin does not have a credible employment base, the existing congestion on the roads leaving the area each morning will continue to increase.*

#### **A4. Access to the Crace construction site**

Planning is under way for the new suburb of Crace, yet no planning or acknowledgement has been made in Variation #257 regarding the effect it will have upon the traffic flow. **We are not referring only to the effect of the additional population once Crace is occupied, we are pointing out the disruption that will occur every single day once the first sod of earth is turned.**

Service vehicles accessing and exiting the Crace site will create danger and frustration for themselves and for other road users. We have been watching examples for the past 15 years as mowers, tractors, trucks and earth-moving equipment block the road because they have no other option. These vehicles trundle along at a pace suited only for a work-site or paddock and create further angst and bottlenecks. To place a 133 hectare construction site at the side of an already busy, single-lane arterial route will multiply those problems exponentially.

#### **A5. Options**

Thankfully, Gundaroo Drive was laid out with a mind to the future. Vacant land was set aside on both sides from the Barton Highway to Mirrabai Drive to enable the road to be widened. Widening Gundaroo Drive even just as far as Gungahlin Drive would provide alternative access to the site for construction vehicles and more civilised traffic arrangements for the residents of Gungahlin and Crace. It would also link more effectively with Gungahlin Drive.

Addressing the situation at the Barton Highway intersection is made more complex by the ACT government’s negative attitude towards committing funds to a major upgrade. Therefore, rather than a major re-construction, a cost effective measure in the short term is the implementation of traffic control measures that enable access to the roundabout yet recognise varying flow-patterns.

Further options to alleviate the Gundaroo Drive/Barton Highway situation are discussed in Part B.

## **A6. Recommendations**

The situation has causes and effects that cannot be addressed simply, and therefore three recommendations are made.

- 1. Recommendations #2 and #3 are carried out before construction begins on the Crace site.**
- 2. Gundaroo Drive is widened to two lanes each way from the Barton Highway to link with Gungahlin Drive.**
  - At a minimum, and if widening is not immediately feasible for recommended length, the widening must be undertaken for the Barton Highway to Nudurr Drive section.**
  - An interim suggestion is for double lanes south-bound plus a temporary access/merging lane on the same side to cope with intra-site traffic. After Crace's completion, the road can be more easily converted to double lanes each way.**
- 3. Traffic lights are installed at the intersection of the Barton Highway, Gundaroo Drive and William Slim Drive, activated only during Monday-Friday morning and evening peak periods.**

## **PART B - NUDURR DRIVE**

### **B1. Background**

Nudurr Drive was designed to span the entire southern boundary of Palmerston, but currently extends only from Gundaroo Drive into Grampians Street, Palmerston. Many maps actually show the original design, but it is currently just a simple **suburban-sized street leading to other suburban-sized streets**.

### **B2. Variation 257 usage**

The Variation mentions Nudurr Drive a number of times but makes no acknowledgement of the impact of use created by the construction site, nor any suggestions that might alleviate that inevitable situation. Two of the mentions in the Variation warrant further comment. They are:

- (a) SPECIFIC POLICIES, page 5: “The suburb is to be accessed from Gundaroo Drive from a single access point and Nudurr Drive at two points.”

*Comment: Given that two is greater than one, the logical assumption is that the plan is for Nudurr Drive to provide a greater part of the access into the construction site.*

- (b) 1.4.10, page 13: “...has only been constructed from Gundaroo Drive to Grampians Street, which provides for connections into Palmerston and to the shops.”

*Comment: The current construction and intent of Nudurr Drive is not appropriate for the type of regular usage that comes with a 133 hectare construction site. It does not “provide” for access to places other than Palmerston, but that is what will happen if no alternative is provided.*

### **B3. Impact upon neighbouring Palmerston**

**The usage currently envisaged by Variation 257 is a dagger pointed at the heart of a neighbour.**

- Kosciuszko Avenue and Grampians Drive in Palmerston will become through-roads for construction vehicles and site workers. Both roads are single-lane suburban streets.
- The Palmerston shops will appreciate the additional patronage at smoko and lunch time, but the residents will not appreciate the extra-ordinary impost.
- Kosciuszko Avenue passes Palmerston Primary School and Pre-School, immediately adjacent to the shops.
- Builders and construction workers will also attempt to use Bollard Street, Palmerston, to access the site.

### **B4. Options**

There are two options that will address the pending impost upon the residents and streets of Palmerston.

Option 1: Close all access to all site vehicles from Nudurr Drive into Grampians Drive.

*Comment: Whilst this option would prevent any through-traffic along Kosciuszko Avenue, it has not been considered further for a number of reasons. The reasons are:*

- (a) it would have a severely detrimental affect on the potential additional trade for Palmerston businesses;*
- (b) it would encourage unlawful access to the site from the eastern side across Gungaherra Grassland Nature Reserve (refer Part D);*
- (c) it would encourage an unacceptable access through residential Bollard Street, Palmerston, and thence across the nature reserve; and*
- (d) it would have an additionally detrimental effect on Gundaroo Drive usage.*

Option 2: Extend Nudurr Drive to join with Gungahlin Drive.

## **B5. Recommendations**

Given the undeniable impact upon adjacent areas if these are not carried out, we make two recommendations.

**4. Recommendation #5 is carried out before construction begins on the Crace site.**

**5. Nudurr Drive is extended to join with Gungahlin Drive.**

The siting of the Nudurr Drive extension is discussed further in Part C.

## **PART C - OFF-LEASH AREAS AND NEIGHBOURS**

### **C1. Background**

As do many Australians, we enjoy the ability to have and to play with our dog. As do many Australians, we have a large dog that needs and enjoys an area in which to be able to run without restraint.

Canberra's streets are, by default, "on-leash areas". Whilst there are designated off-leash areas in Palmerston (*refer Attachment 1, hatched green areas*), as responsible dog owners we find ourselves and our dog continually restricted in our ability to enjoy those areas. The principal areas are the sports oval near the school and the creek bed that runs north-south through the suburb and parallels a public walkway. None of these areas are fenced off and we are therefore usually competing with or harassed by organised sports activities, exercise classes, cyclist, joggers, uncontrolled dogs and cats, prams, strollers, assorted others who are nervous near dogs, and the dangers of vehicular traffic.

### **C2. Existing facility**

It is a godsend to dog owners to have access to a designated off-leash area without the competition of traffic, joggers, prams, etc. Such an area (currently) extends from Grampians Drive to Gungahlin Drive across the south-eastern edge of Palmerston (*refer Attachment 2, hatched green areas*). We use the area almost daily, morning and evening, and there are always other people also using it to exercise their dog(s) away from urban streets.

This designated area is actually quite narrow, averaging only about 20 metres, but has the benefit for users of additional open space (about another 30 metres) between it and the fence line around the northern edge of the Gungahlin Grassland Nature Reserve (GGNR). This is all open space already earmarked for the Nudurr Drive extension.

*Comment: It is not possible to specifically detail the amount of available space between the back fences of Palmerston and the GGNR. The map line defining the off-leash area is a regular curve, yet the Palmerston fence-line changes direction marginally in a few places, and the GGNR fence-line is very erratic. It is also difficult to determine what is meant by a nature "reserve", since the area is frequently used for cattle agistment.*

### **C3. The dilemmas**

The area from Grampians Drive to Gungahlin Drive across the southern edge of Palmerston is marked for the future extension of Nudurr Drive.

- The current design shows Nudurr Drive running close to the Palmerston fences, precluding any likelihood of retaining the off-leash area. Whilst we recognise the need to complete that extension prior to the commencement of the construction of Crace, we and all other users have no desire to lose the existing off-leash facility.
- Secondly, if Nudurr Drive is built as close to the back fences of Palmerston as it appears on the maps, residents will not only lose the off-leash area they will also lose their privacy and a lot of sleep. The road's designed siting and its traffic are too close to the houses.

#### **C4. Options**

The three primary aims can all be achieved by moving the line for the Nudurr Drive extension about 20 or 30 metres south of its currently designed position; a classic win-win outcome. The additional area will:

- (a) enable the extension of Nudurr Drive to remove the option of through-traffic into Palmerston;
- (b) enable a widened, more practicable buffer zone between the Palmerston residences and busy Nudurr Drive; and
- (c) retain the existing off-leash area.

#### **C5. Recommendations**

Following on from Recommendation #5, we make the following two recommendations.

- 6. The Nudurr Drive extension design is moved south to be as close as practicable to the northern edge of the GGNR.**
- 7. A low, waist-height fence is constructed on the northern edge of the new road. The fence is sited to (a) allow reasonable space between it and the road for a pedestrian/cycle path paralleling the road and (b) retain an area wide enough between it and Palmerston back fences for a buffer zone and off-leash area. The path could also be incorporated into the trunk cycleway mentioned in the Variation at page 7, Specific Policies #2.**

## **PART D - AFFECTED FAUNA AND FLORA**

### **D1. Background**

One of the side benefits of exercising a dog in an open area is the opportunity to enjoy the sights and sounds of nature. In the years that we have been using the off-leash area on the southern edge of Palmerston we have seen and heard, and continue to see and heard, many sights and sounds that should be retained. Prime examples are:

- Of an evening, the air is alive (and often deafening) with the sounds of native birds returning to their trees for the night, principally in the stands of tree and recovering undergrowth in the north-east corner of Crace.
- Around sunrise and sunset we regularly seen mobs of up to 24 kangaroos in various parts of the Gungaharra Grassland Nature Reserve (GGNR) adjoining Crace.

We don't see ourselves as "bleeding-heart greenies" and we accept that significant land clearing is a necessary part of our urban development. We also accept that this site is former grazing land with very few areas of significance to preserve. However, we are very conscious of the fragility of what little we do have and believe that this is the final opportunity for the fauna and flora on this site.

### **D2. Variation 257 principles and policies**

We applaud the principles and policies set out in the Variation in relation to this matter.

**Our concern, and the reason for raising the matter in this submission, is a fear that insufficient effort will be applied to maintain those principals in the detailed planning stage and in the actual land release and development.**

Quotes from the Variation most worthy of mention in this context are:

- (1.4.1, page 5) "Crace is an undulating area that contains a number of scattered Yellow Box/Red Gum trees, which form an important landscape feature of the suburb."
- (1.4.2, page 5) "Existing important trees should be incorporated into the urban fabric where possible."
- (General Policies, page 7) "C. Edge roads are to be utilised wherever possible as a buffer between residential development and areas of open space including the Nature Reserve."
- (Specific Policies, page 8) "6. Provide hilltop park."
- (Specific Policies, page 8) "7. Retain important group of trees within open space."
- (1.4.7, page 11) "The Variation emphasises the importance of urban open space as a structural element, contributing to sustainability as well as providing a recreational resource and visual amenity for future residents."
- (1.4.8, page 11) "Crace contains yellow box and red gum trees, .....and it is estimated that approximately 80% of the mature trees (including exotics) on the site contain hollows, which are likely to be suitable as nesting sites for wildlife. Wherever possible these trees will be retained in open space, parks or roadside reserves or as part of the landscape setting for community purposes or other less intensive land uses. Where practicable, it is proposed that trees will be retained as large groups, which will also facilitate the provision

for wildlife movement, particularly for birds across the suburb from the native forest habitat on Gungahlin Hill with the developing habitat on Percival Hill.

Conservation of these trees will be addressed during the detail planning stage. .... The opportunity for developing an ecological corridor associated with the visual corridor on the east of the Barton Highway will also be explored as part of the detailed planning for the suburb.”

- (1.4.8, page 11) “Crace is adjacent to the Gungaderra Grassland Nature Reserve (187ha), which is an important component of the conservation estate in the ACT...”
- (1.4.8, page 11) “The planning principles for Crace respect and recognise the importance of the urban interface with the Gungaderra Grassland Nature Reserve and will incorporate requirements for edge roads and stormwater measures to protect this area.”
- (1.4.9(b), page 12) “The suburb of Crace has Gungaderra Grassland Nature Reserve adjacent to its eastern boundary. It is important that the nature reserve is appropriately protected and buffered against potential threats from suburban development, including weed invasion, dumping of rubbish and removal of plants. It is proposed that a buffer be established which will fulfil both conservation and fire management requirements.”

### **D3. Fauna and flora in Crace**

Our concern within Crace is to maximise preservation of as much of the native flora as possible, for the sake of both the appearance of the suburb and the retention of birdlife. There are only three significant groups of trees, yet their value in the greater scheme is immeasurable. The three groups are identified in the Variation at General Policies (page 7), at Specific Policies (page 7) and at Figure 1.2 (page 8). The areas are also clearly marked in the aerial photo at *Attachment 3*, being:

- **A.** The line of trees around the existing building, near items F and H of the General Policies and Figure 1.2. Whilst perhaps not native, they are well established and would provide an interesting feature of the community facility as well as for bird life.
- **B.** The group of trees identified at item 7 of Specific Policies and Figure 1.2.
- **C.** The group of trees at the extreme north-east corner of Crace.

Whilst the existing undergrowth at these three sites is not wholly native, care and protection and management is essential prior to and during the construction phase to ensure they are not trampled to the point they can no longer be preserved.

### **D4. Fauna and flora in neighbouring areas**

We watched as the suburb of Palmerston grew from a single, solitary house.

- We speak from experience when we say that construction workers and vehicles will seek to track (a) across the grasslands from Gungahlin Drive in the east, (b) from Bollard Street, Palmerston in the north-east, (c) directly from the highway across the buffer zone in the south-west and (d) via the ACTEW/AGL reservoir reserve in the south-east. Each of these likelihoods will irrecoverably damage the environment.
- We speak from experience when we say that disposal and management of waste material (unused cement, plastic sheeting, pallets, beer cartons and empties, damaged fittings, unused

bricks, tiles and frameworks, star pickets, more plastic sheeting, etc etc...) will not be an issue of any importance for site workers.

The GGNR and the Hills Ridges and Buffer Area adjacent to the Barton Highway, is a fragile environmental totality and must be physically protected. All of the areas surrounding Crace must be protected.

**D5. Recommendations**

- 8. Significant physical and financial deterrents to entry to the Crace site from other than Gundaroo Drive or Nudurr Drive are enacted and enforced.**
- 9. Significant physical and financial deterrents to inappropriate waste disposal or control of waste material are enacted and enforced.**
- 10. Adequate, managed, easily accessible disposal facilities are located on the Crace site.**
- 11. The “ecological corridor associated with the visual corridor on the east of the Barton Highway” discussed in the Variation at 1.4.8, page 11, be enacted.**