



The National Capital Authority  
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### **Submission regarding works approval application for “The Barracks” development, Canberra**

The Lake Burley Griffin Guardians appreciate the opportunity to make a public submission on the works approval application by the Morris Property Group for the development known as “The Barracks” on Section 100 (formerly Block 19 Section 63) Canberra.

The Guardians acknowledge the effort made by the Morris Property Group to make a thoughtful contribution to the City Hill Precinct, Canberra’s most important metropolitan centre. However, our public submission will outline serious concerns we hold about the development, we will recommend how the NCA should respond to these concerns, and we will propose solutions.

### **GUARDIANS’ INTEREST**

The Lake Burley Griffin Guardians are interested in this development for several reasons:

1. Our primary concern is that this proposal, if granted approval in its present form, would set a lower standard of urban design than should apply on City Hill and other parts of the Designated Area, the National Triangle, West Basin and Acton Peninsula.
2. Densification of City West will bring greater numbers of residents, visitors and workers seeking access to the foreshore parks of Lake Burley Griffin for recreation and enjoyment of the natural landscape.
3. Urban densification brings risks as well as advantages to the enjoyment of that landscape, especially because of the potential impact of extreme weather events due to climate change. As a major development, The Barracks has the potential to positively or adversely affect liveability in this part of Civic.
4. The Guardians believe we share a deep interest with the NCA Board, and indeed with most Australians, in good stewardship of the National Capital landscape, so we are closely watching how the NCA discharges its duty with regard to urban development which may affect the lake, its foreshore landscape and heritage.

### **CONSULTATION**

At the outset we note that the developer has engaged in what we would consider a minimal level of public consultation. The main element was a single short ‘community and stakeholder’ information session in July, followed by a brief qualitative survey of attendees. They made little attempt to reach out to the City community except via the mandatory advertising and canvassing.

This effort stands in contrast to some other community engagements in which the Guardians have been involved recently, notably Keggins Homes' Sapphire development at Kingston and the Molonglo Group's plans for Dairy Flat Road. These developers have made a significant effort to inform the community and understand the considered views of engaged stakeholders.

The Barracks proposal is little understood by the main body of the public and the usual submitters are likely to be ignored as trouble-makers, whingers, NIMBYs etc.

This minimal consultation further promotes a belief that the proposal is already a 'done deal' and only low cost, cosmetic changes will be accepted.

The Guardians note that the site has been intended for development for many years and we generally welcome the statements of commitment to quality and design excellence in the works approval application. However, in our opinion, the minimalist approach to community engagement has provided little opportunity for informed understanding of the proposal or input to the approval process for a project of this scale (700 to potentially 1200 apartments).

**In our submission, public consultation has been very poor and has focussed mainly on marketing and soliciting registrations of interest in purchase, rather than articulating a coherent urban design vision and understanding community responses to it.**

**The NCA clearly has the right to conduct its own engagement as part of the works approval process and has done so for projects of much less significance than this one (e.g. Westside container village extension application). The Authority should ensure that community engagement is meaningful both in process and outcome.**

## **RECOMMENDATION 1**

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**The NCA should either direct the developer to engage in meaningful community engagement about the entirety of the project or the NCA should undertake such engagement itself before granting approval of any works.**

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## **SIGNIFICANCE OF THE SITE AND DEVELOPMENT**

Under the so-called 'Griffin Legacy' and the associated City-to-the Lake urban redesign mantra, the ACT Government intends to fill the area around City Hill with medium rise mixed use buildings ranging from 25 to 50 metres, to significantly alter traffic management in the City and to face this part of Civic in on City Hill Park. (See diagram, next page, from the National Capital Plan precinct code for City Hill).



NCA. <https://www.nca.gov.au/consolidated-national-capital-plan/precinct-codes-0#city-hill>

City Hill is an important heritage landmark feature that forms one of the National Triangle's vertices from the original Griffins' plans for the Capital. Furthermore, it is one of the few City parks under the ACT Government's custodianship, the others being Glebe Park and Acton Park and, on the northern City edge, Haig Park.

The axes and avenues that radiate from City Hill are required to be protected by the National Capital Plan (4.25). Unfortunately, these have already been compromised by the construction of the ACT Court complex on Vernon Circle blocking the University Avenue vista/axis and the earlier atrium construction over the former Ainslie Avenue for the Canberra Centre. This process of authorised elimination of these supposedly protected important vistas and axes should not be allowed to continue. Therefore, the proposed extension of Edinburgh Ave across the site to Vernon Circle, is welcome because it strengthens one of the radials from City Hill.

Section 100 is significant because of its size (2 hectares +), it is entirely on Designated Land, it is adjacent to one corner of the National Triangle, it is beside the proposed Stage 2 of Light Rail, has good access to road networks, it potentially links Civic, City West, New Acton, ANU and the Lake and it is in line of site from Capital Hill and Parliament House.

The Barracks is the first major residential development in City West since the completion of Molonglo Group's New Acton precinct about five years ago. It also represents a significant step in the City-to-the Lake vision.

When fully developed, the four sites in the development will comprise buildings ranging from 25 to 53 metres, containing at least 700 apartments, 44,000 square metres of commercial and retail floorspace plus parking, so possibly bringing more than 2000 residents and workers to City West.

**The Guardians believe the site's significance is such that its development must meet the highest standards, which are not likely to be reached by the currently proposed design for Stage 1 or the indicative proposals for the entire development.**

## **RECOMMENDATION 2**

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**The NCA's consideration of this works approval application must take into account the proposed development's full impact on the national heritage landscape significance of City Hill and vistas to and from Capital Hill and the National Triangle.**

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## **SPECIFIC OBJECTIONS TO THE PROPOSAL**

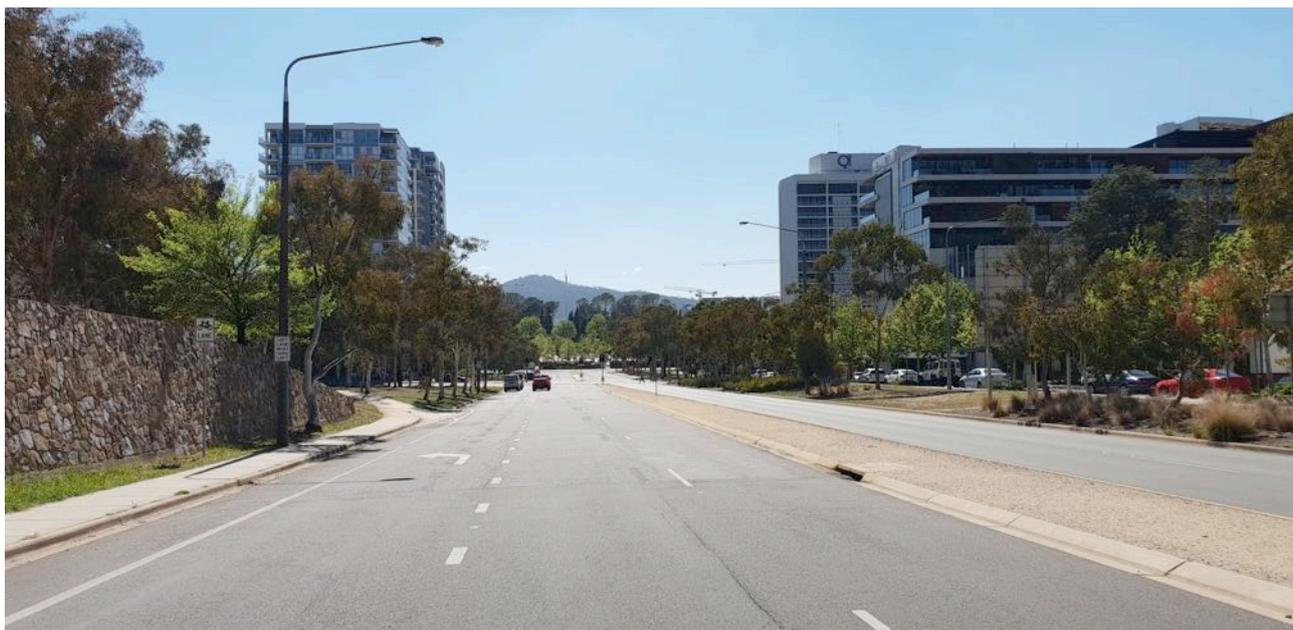
### **Deficiencies in the urban design quality of Stage 1 Site 1, and possible remedies.**

- Over densification of Site 1. The developer appears to have proposed the maximum scale, height and density of development which is permitted for the site. By maximising the private built environment, the proposal extends the concrete jungle of overshadowed footpaths and windswept laneways in City West.
- Lack of pedestrian thoroughfares across the site, between London Circuit and Vernon Circle. By maximising the building footprint, the opportunity for a sense of shared public-private realm internal to the site, as demonstrated in New Acton, does not exist. This is a lost opportunity for a precinct-scale development on this site.
- The Barracks proposal gives an impenetrable terrace frontage onto City Hill that does not interact with that open space in a positive way. This frontage could be colonnaded with shops, hotel and public spaces to give an attractive and vibrant interaction with City Hill. It could also have a mall to invite pedestrians through to the central landscape area of The Barracks and other routes through to London circuit.
- Liveability in the row of loft apartments facing Vernon Circle will be affected by noise, vibration and air pollution from north-bound traffic across Commonwealth Avenue Bridge and also from Edinburgh Ave. The development assumes that the ACT Government's proposed eventual diversion of through traffic onto London Circuit will work. A hotel-style development on Vernon Circle with a formal entrance and vehicle lay-by would be more suited to the eastern side of the site.
- The Knowles Place extension, which is to be used as the main access for 300 apartments and public parking in Stage 1 and the access backbone of the final development, will be a noisy congested service lane (see the traffic management study in the works approval application).
- All car parking should be underground, not a mix including above ground internal parking as proposed, which has the effect of industrialising the façade above the ground floor.

### **Deficiencies in further stages, Sites 2, 3 and 4 and offsite works.**

- The proposed development disrupts the vista along Edinburgh Ave to City Hill by having a shorter building setback on the Edinburgh Ave extension to Vernon Circle than that currently existing in Edinburgh between Marcus Clarke and London Circuit. This vista will be partly blocked by a 53 metre landmark apartment building, which appears to be a contradiction of the requirement of the Consolidated National Plan precinct code that: "The vista to City Hill Park is framed and enhanced by new development."
- There does not appear to be sufficient room for a light rail stop at the corner of London Circuit and Edinburgh Ave. With urban densification, diversion of traffic into London Circuit, and light rail to the south, this will become one of the busiest intersections in Canberra for all modes of transport. The light rail route and City West stop rail stop should be on the eastern side of London Circuit, otherwise it will add to congestion for traffic entering the city via Edinburgh Ave. While this is not the developer's problem, it is an issue which the NCA should agree with both the ACT Government and the developer prior to approval.

- Most of the development appears to have what is known as a zero-boundary (i.e. built to the boundary line at the street frontage) and so every possible square metre of the site is being exploited. The public realm in these later stages also appears to be restricted to the streets, lane and verges.
- Separate cycling infrastructure is needed on the Edinburgh Ave extension between London Circuit and Vernon Circle. A shared path as currently proposed is inadequate to support safe separation, nor is it in line with the road user hierarchy espoused by the NCA and the ACT Government.
- The ACT Government should be required to build, own and maintain, the Edinburgh Ave extension, including the verges. Under the current proposal, the developer is required to build it. Future ownership and control of this space is not obvious to us.
- Further stages of the development will increase congestion in Knowles Place, at the northern end of the site, and around the intersection of Edinburgh Ave and London Circuit. (See the traffic studies.)
- The 53 metre tower at the corner of London Circuit and Edinburgh Ave, in one of the latter stages, will overshadow the Edinburgh Ave extension and any future development south of the site. These off-site impacts appear not to have been addressed in the works approval application.



**The vista along Edinburgh Avenue to City Hill and Mt Ainslie beyond must not be further encroached on by another 16 storey 53 metre building. The wide verges on each side of the Avenue should be continued to Vernon Circle.**

**The Guardians are concerned that the developer is maximising return on investment and so the scale is too big. The buildings are too high, too dense, too close to the street and there is likely to be insufficient light to some of the apartments. A supermarket is planned in late stages but not guaranteed, but apparently more bars and restaurants are certain.**

**Overall, we believe the effect of the development, as currently proposed, will be to cause social congestion in City West rather than improve liveability or amenity.**

### RECOMMENDATION 3

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**The NCA should require that the development be reduced in scale, that it not encroach on the vista along Edinburgh Avenue to City Hill and that adequate space be provided on the eastern side of London Circuit for a light rail stop or bus layover.**

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### RESIDENTIAL ENVIRONMENT

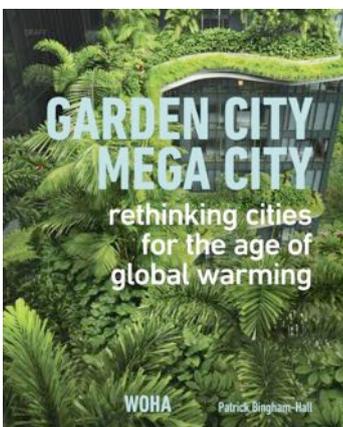
The development appears to be designed to meet current urban design standards based on once in 100-year weather probabilities. The Guardians believe that large scale urban developments need to take account of the increased probability of more extreme weather events in future, particularly increased temperatures, due to climate change and therefore works approvals applications should demonstrate how the planned development would perform in the future environment.

In our quick review of the documentation, we could find no reference, or even aspiration, to design buildings for a warming environment, or for sustainability (as demonstrated, for example, with the NABERS rated Nishi building).

We cannot see how the proposed development would meet the detailed conditions of planning design and development for the City Hill precinct (Section 4.6 of the National Capital Plan - City Hill Precinct code). That section states, in part, that new development should exemplify sustainability principles and demonstrate excellence in urban design, landscape and architecture, rather than continue the mediocre standards that seem to be the acceptable norm in Canberra.

Likewise, we cannot determine how The Barracks proposal would 'exemplify sustainability principles' of world standard, except that it falls well short of latest thinking in urban planning design.

The NCA would do well to consider how this development would stack up against current best thinking on urban design, such as the WOHA "Garden City Mega City" design indices for sustainable urban developments in a warming climate. [For information about the WOHA Garden City: Mega City design philosophy see: <https://vimeo.com/173318728> ]



*WOHA Singapore. Patrick Bingham-Hill*

We note that there are to be 700 dwellings in the four-stage development that includes a 53 metre landmark tower and therefore it is likely that there will be to be more than 1000 additional residents and potentially more than 2000 people living, working or visiting The Barracks.

Yet, there appears to be very little public realm in this project and no reference to provision of community facilities, such as publicly-funded childcare, children's playgrounds, sporting facilities other than a private gym, or educational or recreational facilities for the wider community. Presumably, the apartments will be for sale to investors and downsizers. Likewise, we could find no stated commitment to social housing in the documentation. So, where is the community benefit in this development?

Residents and visitors will be seeking multiple and closely linked recreation spaces other than what can be undertaken with the confines of the development. It is highly likely they will need access to Lake Burley Griffin's Acton Park for walking, cycling, picnicking, swimming, lakeside enjoyment etc. City Hill park will not be sufficient open space to meet the needs of the likely future population around City Hill.

The Guardians believe the creation of a compact city, with higher density around City Hill, reinforces the need to ensure that West Basin as part of the National Capital Open Space System must remain as a parkland and not be obliterated by future development nor have its basin shape distorted by lake infill.

We note also that The Barracks Stage 1, at 25 metres is the same height as buildings which are proposed to be permitted beside Commonwealth Avenue at West Basin.

**The Guardians are concerned that the design, scale, quality and amenity approved for The Barracks will set a low standard for what the NCA would accept, as well as what developers will propose, for the remainder of City Hill and for West Basin.**

#### **RECOMMENDATION 4**

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**The NCA must ensure that this development meets all requirements of the National Capital Plan and preferably exemplifies world class design and public amenity standards that will enhance the future liveability of the City in a warming climate.**

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We would be happy to answer any questions about our submission and take part in any further consultations which the NCA or the developer may undertake.

**Michael Lawson**

Planning and Community Working Group, Lake Burley Griffin Guardians

21 October 2018

The Lake Burley Griffin Guardians is a non-profit community group committed to safeguarding one of Canberra's and the Nation's treasures, the open space of Lake Burley Griffin and its lakeshore landscape setting.

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