



Mr Malcolm Snow
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21 July 2015

Dear Mr Snow

Comments on the Exposure Draft of the National Capital Plan

The Lake Burley Griffin Guardians (the Guardians) appreciates the opportunity to comment on the Exposure Draft (the Draft) for Review of the National Capital Plan (NCP). The Draft presents as a refreshing improvement on the layout of the existing version of the NCP and we congratulate the National Capital Authority (NCA).

The Guardians

The Group has as their focus the planning, management, usage and protection of Lake Burley Griffin and therefore is concerned with Lake Burley Griffin and its Foreshore landscape. This includes the lake waters, the setting landscape that encircles the lake and the values imparted by the lake in terms of vistas, aesthetic qualities and other heritage values. Consequently, comments on water quality here refer principally to the Lake, which is included in the Designated Area of the National Capital Plan (NCP) and declared as a National Capital Open Space System (NCOSS) land use.

Because of this focus, the Guardians is concerned with any parcel of land and water courses where activities may impact the Lake's aesthetic, social, historic and scientific values including its water quality and ecological values.

The major instigators for forming the Guardians group were to:

- safeguard the social, aesthetic, historic and ecological values of the Lake and lakeshore landscape and strive for a National Heritage Listing as the most suitable protection from impacts;
- support development that serves the needs of **all** the Lake's users but also retains and improves the social, aesthetic, historic and ecological values of the Lake and lakeshore landscape setting;
- safeguard the social, aesthetic and ecological qualities of the Lake and its lakeshore landscape, cherished by locals and visitors, from incremental adverse impacts by successive developments and modified land use practice; and
- encourage sensitively designed solutions for both maintenance of and improvements to ecological conditions including the Lake water quality.

The attached comments from the Guardians on the Exposure Draft mostly

follow the numbering of the Items in the Exposure Draft and are limited to aspects of the plan that relate to our specific concerns. Additional comments of concern are also noted mostly on lanscape, water quality and ecological aspects. Summaries of comments relating to major concerns are noted in 'italics'.

Yours sincerely



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Comments on the Exposure Draft of the National Capital Plan

Submission from the Lake Burley Griffin Guardians 21 July 2015

Introduction

As noted in the attached letter comments are made on the Draft specific to the concerns and interests of the Guardians. Recommendations to major points are in 'italics'.

The Guardians supports the key objectives of the plan as set out on page 10.

1.1 National Significance

The Guardians entirely supports the statement of National Significance and the identified matters of national significance.

1.2 Designated Areas (pages 14-15)

The three primary factors for the extent of the Designated Areas are supported as well as the statement about the Griffins' design elements.

Recommendation 1

The National Triangle needs to be named and fully identified in the list of places that comprise the Designated Area; with the NCA named as the authority responsible for the continuing integrity of the National Triangle.

2.2.1 Infrastructure and employment (page 18)

The Guardians encourages the second objective for the location of employment and employment generating landuses in Defined Activity Centres. However further comments on the Molonglo development proposal are made in 3.15. Visionary ideas and research are needed to initiate better income streams for the Territory in areas such as science based technology so that the ACT Government can reduce its dependence on real estate.

2.3.1 Environmental sustainability and open space (page 18)

Recommendation 2

The second objective should stipulate vistas and the importance of open spaces for defining the geometry of the city. The plane of the Lake is important in this role, allowing views to nationally significant terminii and views across the the lake to the mountains beyond.

Recommendation 3

The Guardians support the conservation of the major vistas from major landmark locations and parklands, around Lake Burley Griffin and other vistas such as from the former Kingston Power House towards the eastern lake shore, from the Arboretum towards the lake and along roads such as Sturt Avenue across to Mt

Ainslie.

Real estate development for commercial gains provides only a short term economic boost for the Territory but destroys the lake and lakeshore landscape forever.

Recommendation 4

The Guardians strongly urges the production of specific masterplan and guidelines for lakeshore. This plan should accommodate the need for lakeshore recreation for the next 100 years.

Water Management Water Quality and Ecology

The landscaped quality of the Griffins' design for The Nation's Capital invokes an environmental quality which is a key feature of Canberra's character and in particular of the Lake Burley Griffin. Conserving and enhancing this landscape setting is important in retaining the character of the National Capital.

The ecological communities, threatened flora and fauna species, water catchments and water quality of this Designated Area are to be protected and supported by sustainable resource management.

In this context, the health of the Lake waters is paramount. The manifold uses to which it is put, particularly recreational uses, are directly dependent on good quality, healthy water that sustains a diverse ecology.

The ability of a water body to sustain a diverse ecology depends largely on a well aerated water column free of pollutants. Its management variously involves the detection of adverse conditions (monitoring), their remediation where possible and the identification of their sources whether *insitu* or upstream.

The seriousness of water quality issues and in particular, their impact on Lake usage, in recent years has given rise to an intensification of management activities directed at their abatement and eventual deletion.

There are many references in the Draft to the sustainability of high environmental standards, maintenance of good water quality in different precincts and similar inferences to robust and healthy ecologies but they remain largely aspirational; no great detail is devoted to how these conditions should be effected. Methods of monitoring, remedying and prevention of poor water quality are lightly touched upon in the Precinct Codes for Lake Burley Griffin and Jerrabomberra Wetlands on the lake's Eastern shore.

The Draft notes that these two features are linked by a range of common processes and biological assemblages that vary mostly by seasons. Among several existing impacts noted are nutrient transfer into the Lake from cattle grazing in the wetlands, disturbance to sensitive and endangered avifauna in the wetlands from the extremely high density accommodation nearby.

Recommendation 5

The Guardians would like to see the strong interdependence between Lake Burley Griffin and Jerrabomberra Wetlands emphasised much more definitely and in a way that precludes any management or development in one that will impact even lightly on the other.

Recommendation 6

The Guardians would like to see much more strength behind the Draft's

statements relating to the maintenance of a robust and sustainable ecology both in the water column and the riparian surrounds of the Lake and other water bodies and water courses.

There is reference to poor mixing and aeration in a number of partially closed embayments. Currents that would normally dilute smaller pollutant doses and promote aeration are wholly or partly absent.

Recommendation 7

The Guardians wishes to see the problem of poor dilution and aeration in partially closed embayments addressed more positively in the Plan.

Urban runoff and the pollutants it carries (including leaf fall, pet faeces, rubbish) continues to be costly to manage.

Recommendation 8

The Guardians urges that pollutant transport in urban runoff be addressed a good deal more positively in the Draft.

2.4 Livability (page 19)

2.4.1 Urban Design and Heritage

We support the first Objective and Principles.

We note reference to the point:

'Vistas to major landscape features shall be protected and enhanced by development.' and are concerned that vistas to and from City Hill and to West Basin will be detrimentally impacted by the proposed developments around City Hill and West Basin (as further discussed in 3.3.1-3.3.3., 4.6 and 4.7).

Second Objective (page 20)

Principles

The Guardians notes that 'Heritage places within Designated Areas will be considered as Commonwealth Areas for the purposes of protecting the environment'. The Guardians sincerely welcomes this change in heritage management so that Lake Burley Griffin and its foreshore landscapes can be considered for the Commonwealth Heritage List and managed as a unit.

Note: The reference to the EPBC Act should be corrected from 'Environmental' to 'Environment'.

We also welcome the initiative to present and interpret heritage places for increased public awareness.

Recommendation 9

The protection and management of listed heritage places formerly in Designated Areas but now excluded, need to have a formal agreement in place for their listing in the Territory Heritage Register and ongoing management.

3.1.5 Figure 2: General Policy Plan – Metropolitan Canberra (page 25)

The proposed urban development area between the Molonglo River and Piallago Avenue close to Oaks Estate is a valued Indigenous heritage area.

There has been and continues to be polluting urban runoff from Queanbeyan and Canberra urban areas that adversely affect the water quality of Lake Burley

Griffin. As the area abuts the confluence of the Queanbeyan and Molonglo Rivers it is therefore susceptible to water pollution from urban runoff. The proposed Molonglo development area would require adequate runoff treatment plants.

It also appears that the proposed Molonglo area development and east Symonston will be in the Canberra Airport flight zones and therefore need to be industrial or commercial. While the Guardians support industrial/commercial or business development to augment the Canberra economy, the Molonglo area is too sensitive for such development and a review of this proposal is recommended.

The development planned in the rural lands west of the Murrumbidgee may impact the scientific complex of the Canberra Deep Space Communication Complex (formerly Tidbinbilla Tracking Station) that is on the National Estate as an indicative Commonwealth Heritage place as noted in 3.2.4.3 h. It is essential that adequate EIS and Heritage Studies will be undertaken *prior* to development planning and with NCA authority.

It is not clear how do the proposed Molonglo area and the West Murrumbidgee area fit into the established urban towns without distorting the current town centre planning principles and without distorting emphasis on Civic and contributing to further traffic congestion. The concept of population increase and urban density appears to simply support a reliance on land use development income.

3.2.2-3.2.3 Principle and Policies for the National Capital Open Space System

(pages 28 - 29)

Supported by the Guardians

Note: There appears to be an error in the section numbering with 3.2.3 also used for Hills Ridges and Buffer Spaces

3.2.3.3. Policies for River Corridor (page 35)

f. Lanyon shall be maintained...

Recommendation 10

With reference to 3.1.5 d. the term 'Lanyon Bowl' should be used rather than 'Lanyon' which implies only the homestead complex.

3.3.1 - 3.3.3

The Guardians supports the hierarchical principles of urban structure with Civic 'to be encouraged to develop as the most specialised retail, commercial, cultural, entertainment and tourist centre' while recognising the role that other town centres play as dispersed town centres.

Recommendation 11

The Guardians is very concerned about the proposed West Basin development - City to the Lake. This is a forced development which doesn't work for Civic which has an enclosed character deliberately constructed without connection with the Lake. The Civic principle will be the loser as the current (historic) centre of Civic will be conflicted by City to West Basin. We recommend that further research is needed to resolve the conflicts to the commercial and retail areas of Civic.

3.7 Rural Areas

3.7.3 Policies for Rural Areas (page 46)

3.7.3 d.

Note: Check the name of the Deep Space Communication complex. Tidbinbilla or Canberra?

4.1 The Central National Area (pages 51-56)

This is not listed in the table of contents although 4.2 the Parliamentary Zone is.

4.1.1 General Policies for the Central National Area (pages 52-54)

The Guardians support the general policies to protect the 1918 Griffin Plan particularly in:

1. b.
2. a., d., e., g., h., I and j.
3. a., b., d., e.,
3. c. Private housing should not be enabled to exploit central lakeside national open space areas that are required for for the future national capital visitation use or for the use by the population for contemplative views comprising mostly of natural or contrived natural foreshores.

Recommendation 12

The Guardians is opposed to the insertion of housing into the principles for the Central National Area.

There is no mention of the axes that are significant features of Griffins geometry. Please rectify.

4. The Guardians support the linking the city to the Central National Area (page 53), (5) extending the City to the Lake (page 53 -54) and (6) reinforce the Main Avenues (page 54). However many concerns about the lake side development proposed for West Basin is noted under 3.3.1- 3.3.3 and elsewhere in this submission.

7. Link national attractions (page 54)

Recommendation 13

The Guardians suggests a point 'c.' that the recommendations of Etched in Stone, the Inquiry into the Administration of the National Memorials Ordinance 1928 by the Joint Standing Committee on the National Capital and External Territories, be adopted. Furthermore we note that some existing memorials such as the Australians-of-the-Year marker posts need revision as the location of these for the ongoing years will be an adverse impact on the Lake landscape.

The Guardians supports:

- i. 'enhancing the provision of lake and land-based recreational and tourism opportunities within a predominantly public open space setting.'
- and
- k. 'enhancing the vistas to the national attractions and icons.'

Recommendation 14

The Guardians believe that vistas to City Hill a major national icon will be lost with the development proposals outlined in this plan and should be protected.

4.1.2 Detailed conditions of planning, design and development (page 55)

Recommendation 15

The Guardians supports items 1-16, conserving the prominence of City Hill as an iconic feature of the Designated Areas and National Triangle and therefore City

Hill deserves a dot point to link to the precinct outline.

14. The Guardians supports the proposal for a landscape master plan for the Designated Areas and notes that while this Draft frequently refers to historic urban planning as City Beautiful and Garden City, there should be more credit given to Griffin's original organic principles.

Recommendation 16

There should be more credit given to Griffin's original organic design principles.

Recommendation 17

With regard to the landscaping, particularly the lake shores we recommend the association to be with Griffin and the likely influence of the landscaping works of Frederick Law Olmsted Snr, along with the NCDC landscaping of the 1960s rather than the City Beautiful and Garden City which is associated with the FCAC (Federal Capital Advisory Commission).

4.3 Parliamentary Zone Precinct Code (page 60)

4.3.2 Precinct Location

The Guardians questions the boundary of the zone being the eastern side of the road reserves of Commonwealth Avenue, the western side of Kings Avenue. We suggest the zone should include the whole of the avenues that border the zone and extend on to Capital Hill.

Recommendation 18

The avenues are distinct features that reinforce the zone and the entire road reserves should be kept as a unit and not split down their centre.

4.3.6 Tree Planting (page 71)

A consistent approach to tree planting is recommended with a master plan for the Parliamentary Zone and Kings and Commonwealth Avenues that considers all aesthetic aspects of trees; evergreen colour, tree form, trunk texture, trunk colour, flowers, deciduous to allow winter sun as well as drought and frost hardiness, and shade protection against summer heat. Red colour together with bright green in the spring is valued feature in Canberra's landscape. However red colour for one month is not the most important aesthetic feature.

Most space areas in the Parliamentary Zone have intersections with squares with Lombardy Poplars that create accents through their form as well as for their short-lived autumn yellow. In the Zone there is a good mix of deciduous trees, evergreens including natives (*Eucalyptus maidenii*) on King Edward Terrace and the eucalypts on either side of Federation Mall. Autumn colour is present in many of the trees and its attractiveness is enhanced by the presence of evergreen trees.

The tree form for walkways, car parks etc. need careful consideration. The major trees lining Commonwealth and Kings Avenue need to have rows of major trees that are tall and evergreen on either side to create the formal approach to Parliament House. Additional rows of deciduous trees could be included as adjacent rows.

The Manchurian Pears along the lakeshore drive provide a flash of brilliant red and springtime green that is a colourful treat and enjoyed by people for a short time. However, emphasising buildings with brilliant colour should be cautiously

considered. A short-lived fashion can become a longer-term intrusion.

Recommendation 19

The Parliamentary Zone should have a dignified tree-scape appearance well planned and set out to achieve the best quality designed landscape. This landscape differs from Commonwealth Park that was designed as a park to have colour and horticultural interest.

4.4. Barton Precinct Code

Comments written for 4.3.2 Kings Avenue apply.

Brisbane Avenue is an important avenue that has and will continue to require attractive tree planting.

Recommendation 20

As for Sydney Avenue, the whole of Brisbane Avenue road reserve should be included in the Barton Precinct.

4.6 City Hill Precinct Code

4.6.3 Objectives for City Hill (page 109)

One of the objectives should be: to maintain the role of City Hill in Griffin's central geometry as a visual icon and apex of the National Triangle.

In the case of Diplomatic Missions if they are located in the City area does that mean those properties will be identified as 'national land'? The immediate area surrounding City Hill is extremely important for the expression of a key landscape feature. How can parking be accommodated in the proposal?

The Guardians note that the permitted landuse in this highly significant area that include Residential, Scientific Research Establishment, Diplomatic Mission, Health Centre, Indoor Recreation Facility, and Casino, all of which can be better located and serviced elsewhere.

Recommendation 21

Any such activities around City Hill should be housed in the building form of a well designed ring below the City Hill tree canopy.

City Hill Park as a central open space (page 112)

The comments regarding the space are vague.

What are the topographic changes are envisaged to modify the park?

Has any thought been given to planting taller evergreen trees on City Hill?

How will buildings be acillary to the purpose of public space?

Should buildings be required to address the park?

So that pedestrians can easily access and enjoy the City Hill park is there any plan to slow down the traffic in Vernon Circle.

Recommendation 22

The Guardians note that the planning for City Hill so far is of great concern and demonstrates a failure to live up to the potential expressed in Griffin's designs. Best practice urban and landscape design should be pursued to conserve the iconic value of City Hill landmark.

Building Height (page 113)

The building heights at 25m above the kerb of Vernon Circle are too high.

Fig. 43 demonstrates how City Hill will be destroyed as a visual topographic apex of the National Triangle. It clearly shows the buildings around Vernon Circle as above the tree canopy height consequently diminishing the heritage value of City Hill. This development is a travesty being forced on Central Canberra. City Hill could have effective lower level buildings on Vernon Circle that address and complement the circle and Hill Park. Why is a sense of enclosing and hiding the City Hill Park desired?

The landmark buildings of 14-18 storeys high proposed in the precinct at Northbourne and Commonwealth Avenues will effect the complete destruction of City Hill as a landmark icon of the Griffin geometry.

Recommendation 23

The Guardians is totally opposed to the height of the development proposals around City Hill, particularly the landmark buildings on Commonwealth and Northbourne Avenue. The buildings will completely block vistas to and from City Hill from the nationally significant avenues and from public areas around the lake. The precinct should be redesigned to protect the vistas to and from City Hill.

Figure 38 as an indication of connection and vistas is a pretence, it fudges the intention of the development on the vistas. The public on City Hill will not be able to enjoy vistas across the lake to the west and east at all. Vistas will only be available to the occupiers of the upper floors of the proposed 'landmark' buildings.

Recommendation 24

A plan should be drawn that truthfully illustrates the vista lines.

Recommendation 25

The car parking of the Designated Areas needs to be explained in this plan and not be referenced to the ACT Government Parking Strategy.

4.7 West Basin Precinct

The Guardians notes the proposed recreation area of the precinct is far too narrow to create a meaningful recreation zone. The apartment/business development component is far too extensive and too high. It does not provide for meaningful public space and will constrain public use and access. It is a gift to the apartment dwellers and a great loss to the public and future public recreation use.

Recommendation 26

The Precinct should not be subject to the proposed development. It will be detrimental to Central Canberra.

4.7.3 Objectives for West Basin (page 125)

The objectives state it will provide for links to national attractions. This can be better achieved without the presence of blocks of apartments.

Recommendation 27

West Basin is a space that should entirely be for future recreation. It will be better with landscape to the water's edge and no buildings

Diplomatic businesses as shopfronts for Visas if required should be located in the business area of Civic or in Constitution Avenue. If they are Diplomatic Missions for accommodation and entertainment they should be located in the defined

Diplomatic areas.

Recommendation 28

The type and location of Diplomatic Missions should be clarified. They should not be spotted around Central Canberra and definitely not located in West Basin.

4.7.5. Building Height and Form (page 131)

It is likely that in winter 25 or 16 metres high buildings will shade the recreation strip.

The location for the parking for the proposed buildings has not been identified

The public waterfront promenade is proposed as reflecting the geometry and intent of the 1918 Griffin Plan. The Guardians notes that there was a large parkland space area depicted in the 1918 plan while in this current proposal that area is the setting for four large building blocks and one one smaller block is a contradiction to the Griffin Plan.

Recommendation 29

The Guardians believes this expansive development proposal is a detrimental impact to the heritage significance of West Basin. As it is also detrimental to the Griffin legacy concept which was for a city of landscape spaces and low building form, we recommend the development proposal be dropped.

Waterfront Promenade (page 135)

Note: is it correct that a minimum width of 55 metres for footpaths is to be provided?

4.8 Constitution Avenue and Anzac Parade

The Guardians welcomes the increased recognition of Constitution Avenue as the base of the National Triangle. We note that the density of building development is approximately twice the density of the 1918 Griffin Plan. Also the 1918 plan has continuous building frontages to Constitution Avenue – which Griffin called Capital Terrace – on the north side only. This is an area that could accommodate some of the developments proposed for City Hill such as Scientific Research Establishment, Diplomatic Mission, Health Centre, Indoor Recreation Facility, and Casino.

Water sensitive urban design (WSUD)

The Guardians supports WSUD and notes that the Draft needs to outline how this can be augmented to insist that exemplary engineering design that provides the highest efficiencies. Treatment units need to be distributed along the drainage lines to spread peak runoff loads and minimise overflow.

The WSUD is a loose term open to widely differing interpretation. It is invoked in several of the 16 Precinct Codes but apparently not in all Precincts draining into the Lake, at least not in those terms. WSUD broadly covers the pretreatment of storm water runoff en-route to the receiving water body. Absorbing swales and urban wetlands are examples of features away from the Lake shore.

Recommendation 30

The Guardian feels strongly that that there must be a goal to apply WSUD widely

in all sub-catchments of the Lake's catchment.

Riparian zones should be created wherever they are compatible with usage in the Lake's catchment. A riparian zone is a strip of vegetation whose width is determined by the underlying topography where the slowed runoff has a greater opportunity to infiltrate the soil and re-emerge in the water body of the Lake, stripped of some or all of the suspended sediment by the filter of the soil and of nutrients by the root system. The emphasis is on effective function, not on a notional width predetermined by desk-top exercise without reference to the substrate in which the plants are to grow. In the highly disturbed Lake vicinity, it might be necessary to replace the existing substrate with a more permeable imported, pathogen free soil. Away from the Lake, existing riparian zones will need to be augmented, rehabilitated or restored where they have been destroyed throughout both urban and non-urban sub-catchments.

Recommendation 31

Functionally effective riparian zones should be established around the lake and on the banks of both urban and rural streamlines wherever it is feasible to do so in the Lake's catchment.

4.12 Lake Burley Griffin and Forehores (page 197)

4.12.3 Objectives for Lake Burley Griffin and Foreshores

There are many minor vistas to the lake in the urban areas between buildings such as from the Shine Dome area to between Acton Hotel, the Nishi Building and from the Kingston Power House to the lake. The Guardians notes that a study of the vistas and views from most of the lake landscape was conducted by S. Pipitone for the National Trust ACT.

Recommendation 32

The first dot point should comment on the aesthetic and heritage qualities and that the intimate and extensive vistas should be maintained.

The lake precinct should cover all the lake edging landscape. This includes the lake edge landscape of Acton Peninsula alongside the ANU Precinct and the narrow landscape area between Parks Way and the water edge extending to Yarramundi Reach.

An uninterrupted pedestrian/cycle pathway around the lake is encouraged and this should also include a board walk on the lake side of the Governor General's residence.

While a diversity of landscape planting character, that includes exotic trees is attractive, there should be more emphasis on encouraging local native woodland for native fauna habitat in areas such as Acacia Inlet, Sullivans Creek Inlet, and elsewhere in the lake fringes. The native grassy woodland area of Stirling Ridge and Attunga Point is important area for natural values.

Recommendation 33

The Guardians encourages a master plan for the whole of the lake and lakeshore landscape. Research into the historic tree plantings planned and implemented by Weston, Griffin, Pryor and later by Richard Clough and the NCDC Landscaping Division needs to be investigated and analysed now that planting has been in place for over 50 years. All major vistas and views need to be identified.

Lake Water Quality

In the Draft the protection of shoreline macrophyte areas is proclaimed for several parts of the Lake. These comprise both planted and natural vegetation. The most effective functional assemblages along a shoreline is where riparian vegetation merges into and links with a macrophyte zone. Sediments and nutrients which may not all be stripped out by a riparian zone will be further reduced by the macrophytes. While either zone, riparian and macrophyte, might not be able to be linked with the other in some parts, it is important to establish as much of both as is possible, staged if necessary as funds become available. The Guardians see this as a long term, unified project to be pursued with vigour.

Recommendation 34

The Guardians see as a matter of high priority in strengthening the ecology of the Lake's waters and surrounds, the extension wherever possible of linked assemblages of riparian and macrophyte vegetation that act to refine both overland and instream inflow. Where the two cannot sensibly be linked, then one or the other alone is to be rehabilitated or established.

4.12.4 The term 'Public Utility' must be defined within the Draft.

4.12.5 Development Nodes

Conservation (page 204)

It should be noted that the entire lake and its foreshores under consideration as a heritage feature.

ACT Hospice Site (page 204-206)

Pages 204 -206 are devoted to the planned expansion of the ACT Hospice. The Guardians believes this is a short-sighted view. The existing hospice site is a sensitive lakeshore environment and located off a very busy road. It is apparent that a complex such as a hospice will always require further development expansion.

Recommendation 35

The NCP should encourage other sites in Canberra be established and developed when needed for hospice purpose.

Boathouses and other recreational or community development directly related to the use of the lake (page 206)

Recommendation 36

Apart from form and colour, size is also important and it should be noted that as these buildings are to be in harmony with the lake image. Security fences are visually intrusive should not be permitted. Storage outside boatsheds should be limited to water craft.

'Public safety' along with 'public access' needs to be inserted in the second sentence.

Lake maintenance and boat servicing (page 207)

Recommendation 37

Further comments are required to ensure such structures are located in appropriate development nodes and do not impact public parks.

Siting Policies (page 207)

Recommendation 38

Archives and reference collections should be located in purpose built archive buildings.

4.13 Acton Peninsula

Figure 112

It is questionable that the landscaping east of Lennox Avenue is now to be predominantly exotic. There already exists a strong native character of tree planting in the ANU area.

This submission is prepared by the Lake Burley Griffin Guardians co-authored by:
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