



Plan Review Team
National Capital Authority
Email: plan.review@natcap.gov.au
23rd June 2017

Dear Plan Review Team

Please find attached the submission from the Lake Burley Griffin Guardians on the Kings and Commonwealth Avenue Draft Design Strategy.

Yours sincerely

Juliet Ramsay
Convenor
Lake Burley Griffin Guardians



**Kings and Commonwealth Avenues Draft Design Strategy
Comments by Lake Burley Griffin Guardians
June 2017**

Lake Burley Griffin Guardians is an incorporated group concerned with the protection of Lake Burley Griffin and its lakeshore landscapes. Therefore we make comments in the light of how the Kings and Commonwealth Avenues Draft Design Strategy will impact the existing values of the lake and lakeshore.

2.4 Current Planning Policy Context

Heritage Policy

The Guardians acknowledge that Kings and Commonwealth Avenues are now considered of heritage significance with Commonwealth Heritage value and that when entered in the Commonwealth Heritage List, heritage protection under the Environment Protection and Biodiversity Conservation (EPBC) Act 1999 applies. The significance of the avenues documented in the draft design strategy appears as a brief summary.

The Guardians note that the Parliament House Vista is listed in the Commonwealth Heritage List and the delineation of the Avenues abut and at times overlap this existing heritage place. This should be noted in the report. As the significance of heritage places should form the basis for future use changes, a well-researched comprehensive statement of significance should be provided even as an appendix.

A major heritage aspect that is overlooked in the summary of heritage is the aesthetic experience of the avenues. This needs to be clearly documented to cover the entire routes of each avenue including the important vistas and their termini, views, sight lines, viewing points, and viewing areas. It needs to document the view cones and how the views are experienced such as by car, by bus, by bike and by walking. The visual journey is a dynamic of experience and vista termini such as Parliament, City Hill and Russell need to be noted, particularly the expansive views and vistas across the lake along with the way the vistas open up from City Hill to the way they close in the southern treed avenue of Commonwealth Avenue.

The dignified treed avenue of the southern part section of Commonwealth Avenue has strong aesthetic importance. The aesthetic experience is critical for heritage Section 2.4, Existing Conditions Section 2.6 and, Vision and Principles 3.0. Identifying and recording these aspects is critical prior to the establishing the Framework, Details and Strategies.

Vernon Circle at City Hill is the commencement of Commonwealth Avenue. Questionable planning in the Griffin Legacy that appears to ignore heritage and the following Amendments 59 (City Hill) & 61 (West Basin) to the NCP have set in train a future of unfortunate adverse impacts on the national significance of the entrance to Commonwealth Avenue and the journey to Parliament.

We note that any proposed impact on the heritage significance of Parliament House Vista will be grounds for referral under the EPBC ACT 1999 and that any proposed impacts on the heritage significance of the Avenues once they are entered in the Commonwealth Heritage List will also be grounds for referral under the EPBC Act.

2.4 Recommendations

1. The proposed development at West Basin of a Building Estate and the proposed development between London Circuit and Parkes Way will have a significant detrimental impact on the aesthetic experience from the Commonwealth Avenue Bridge where visitors experience the vistas across the lake and the appreciation of the landscape design of Canberra. The proposed developments will block critical vistas across lake waters to the Museum and to the mountain ranges beyond. The NCA should do all in its power to halt the development planned in West Basin as well the developments proposed near City Hill that will block vistas when entering Commonwealth Avenue and also vistas from the proposed Canberra Forum complex.
2. Given the importance of vistas from Commonwealth and Kings Avenues we strongly recommend the listing of Lake Burley Griffin and its Lakeshore Landscape on the Commonwealth Heritage List.
3. The heritage listed Parliament House Vista should be acknowledged in this study and in compliance with the EPBC Act, this strategy will need to be referred to the Department of the Environment and Energy.
4. Significant heritage items in the avenues should be noted such as the Bunya Pine on Kings Avenue and the statue of Edmond Barton.

2.6 Existing Conditions

As the avenues have been in place for over a century they have acquired character. Every segment of the avenues now needs analysis that includes heritage, vistas/views, social and circulation. For example in Acton Park West Basin the former futsal courts are open and bare, while the northern carpark has been planted with trees whose canopies provide a leafy base to the vista of the lake from the commencement of Commonwealth Avenue.

Figure 4, page 10 shows a paucity of key views and needs to be redone with community members to give a complete and accurate documentation of views and vistas needed to establish the planning framework of this document. An odd dashed line exists that seems to be the Water Axis but if so it appears to be inaccurate. The western mountain ranges are viewed west from Commonwealth Avenue. The views from open areas such as those between Albert Hall and Commonwealth Avenue Bridge are not noted. The view of the National Library is not noted as a key feature while the view of the Kingston Foreshore is noted. Noting major viewpoints only from the centre of the bridges is inadequate.

It appears that all of this section is devoted to trees. A small map on page 11, noting Landscape Character Areas appears to be areas of historic tree plantings while the maps noted areas of historical importance is also apparently only related to trees. How has this historical importance

been analysed. What is the criteria for 'historical importance' that differs from the Landscape Character plan.

2.6 Recommendation

1. An accurate analysis of vistas and views and the location of viewpoints and viewing areas from the avenues is a most important planning background to this study and is needed before setting in place planning principles. Such a study requires expertise in visual analysis and public representation

3.0 Vision and principles

The West Basin proposed development in the parks designed by Griffin are at times contrary to the vision and principles conveyed in this study. The visual connection with lake vistas is a vital feature that is most critical on the northern and southern sides of Commonwealth and Kings Avenues on the approaches to the bridges. If the proposed robust landscape character consists of a dense avenue they may block significant views and vistas on the approaches to the bridges. While median planting will contribute landscape character, the vistas east and west from the avenues and the bridge approaches must be identified.

3.0 Recommendation

1. As for 2.6 an accurate analysis of vistas and views and the location of view-points and viewing areas from the avenues is a most important planning background to this study, and is needed before setting in place planning principles. Such a study requires expertise in visual analysis and public representation.

**6.0 Strategies
Trees and Planting**

It appears the section diagrams with their explanations, pages 42 & 43 are not correctly linked by section labeling to the plans, pages 40 & 41.

The dense avenue plantings on the southern sections of Kings and Commonwealth Avenues are encouraged to give a dignified final approach to Parliament. It is important that these trees have a dignified presence and be, as noted, tall and a mix of deciduous and evergreen as present with Cedars and Oaks. Tree arrangements should be varied to avoid monotony.

Numerous trees have died in recent drought conditions. What measures are being established to capture storm water in order to water trees rather than have it run into the lake where leaf litter is polluting?

Why are the circular approaches near Albert Park taken away and blocked with avenue plantings. The area has recently been planted with young trees to emphasise the circle and provide a parkland foreground to lake vistas of the lake, Black Mountain and West Basin.

However the dense avenue planting on the northern side of both avenues blocks existing vistas across the lake that commence on City Hill. The planning in the study is detracting from the superb vista experience across the lake to just the vistas and views from the bridges. Avenue planting on the northern side of the bridges appears to be proposed to hide the intense

detrimental building developments proposed for the lake parklands and set in place by the NCA in 2006 by amendments to the National Capital Plan.

After proposing to destroy the vistas across West Basin and vistas to West Basin, selling the perimeter parklands set in place in the 1960s and greatly reducing the public use of the area, it is noted that a new bank of buildings has now been drawn in Grevillea Park lands that will obliterate parkland space and vistas in the approach to Kings Avenue Bridge.

6.0 Recommendations

1. The Forecourt Gardens on the Parliament Triangle should double as water detention ponds to capture water and in that location they will feed the adjacent avenue plantings. All median strip beds should also be water-capturing areas.
2. Detrimental impacts to the avenues proposed in the National Capital Plan should be stopped:
 - The developments proposed at West Basin.
 - The developments proposed abutting Commonwealth Avenue between London Circuit and Parkes Way.
 - The vista blocking buildings now drawn on Grevillea Park, abutting Kings Avenue.
3. The proposed Australian Forum should have vistas across the lake. Unblock the blocking of vistas by buildings and proposed avenue plantings in this key location where people circle around City Hill and the vistas of the central lake opens up to them.

6.2 Traffic and Transport

Why is the planning of the new through traffic intersection that will considerably constrain traffic flow on a major route desirable, particularly when moving from point A to point B in as little time as possible seems to be desirable?

When Canberra's early traffic circles were planned they were modern traffic management features. It appears that the many new cross intersections proposed are a backwards step to impose 19th Century gridlines on Canberra with numerous traffic light stops. Some testing is needed to evaluate perceived traffic congestion.

Why does tight geometry to kerbs give a 'more urban feel' and why is this desirable?

Some of the new intersections seem excessive such as the cross traffic road at Albert Hall. Why are these necessary when cross traffic can loop around and there is an underground crossing nearby?

Three entry roads into West Basin are excessive. Why are they necessary, particularly when there has been no final master plan for the West Basin Building Estate that is supposed to address issues and the excessively expensive bridging of Parkes Way.

As the avenues are major routes into the City as well as the key ceremonial routes to Parliament, it seems that more expansive future planning for traffic should be investigated such as an underground urban railway network and how these proposed traffic modifications will connect with the Y plan and into the next 100 years. What is proposed appears to be a series of

bandaid measures to enable better pedestrian access which is needed but also slowing down traffic flow that could surely be done with speed signs.

6.2 Recommendation

1. Pedestrian routes through the median strip gardens are encouraged to link to cross overs with lights.
2. Before new intersections are constructed, a series of temporary stop-lights where the straight intersections are planned, are needed to evaluate their effect on traffic flows and traffic build ups.
3. Future transport planning is required. Other traffic routes such as under the lake and underground car and rail routes should be investigated.

7. Implementation and Next Steps

The Guardians support proposals to improve the treescaping of the avenues particularly south of the lake as well as median strip gardens provided there is no decrease in the number of traffic lanes.

The Guardians do not support dense avenues blocking the approaches to the bridges that currently provide significant viewsapes.

The Guardians strongly note that it is illogical to plan according to templates when there has been no complete analysis of the existing values. As stated under Item 2.4, there needs to be a professionally prepared Commonwealth Heritage Statement of Significance that includes an aesthetic experiential analysis. There needs to be a professionally prepared view and vista analysis along the lengths of both avenues.

The templates may then need to be reworked according to the determined existing values as some of the templates appear to be detrimental to vista/view values.

A revised draft strategy that involves a development plan and a landscape strategy will need to go through another stage of consultation.

**Lake Burley Griffin Guardians
26 July 2017**