



Mr Malcolm Snow
Chief Executive
National Capital Authority
Malcolm.Snow@natcap.com.au

13 December 2015

Dear Mr Snow

Proposed Amendment to the National Capital Plan

In response to your advice (email, 27 November 2015 from Andrew Smith) we are providing a recommendation for an amendment to the National Capital Plan.

As you are aware the Lake Burley Griffin Guardians is a group concerned for Canberra's greatest landscape asset, Lake Burley Griffin and its lakeshore landscape. We are also concerned about the expression of the National Triangle that the lake crosses. We have previously submitted our mission and objectives to the National Capital Authority.

Based on our concerns and as members of the public we wish to make a formal representation for an amendment to the National Capital Plan. We are basing our representation on items in the National Capital Plan dated 30 September 2015 that includes Amendment 86. The items are also present in the Consolidated National Capital Plan 2014.

Our representation for an amendment to the National Capital Plan is focused on the West Basin and City Hill Precincts. As it stands, the National Capital Plan will enable detrimental development of both precincts, detrimental impacts on vistas across Lake Burley Griffin and also, in the case of West Basin, detrimental impacts on the public lake foreshores.

Our concerns relate to the important heritage values of City Hill, Lake Burley Griffin and its Lakeshore Landscape and significant associated vistas. The development proposed in the National Capital Plan that we seek to be amended, will adversely and seriously impact these values

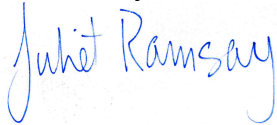
There is much evidence of the heritage values of Lake Burley Griffin as documented in the several heritage nominations for Lake Burley Griffin and its Lakeshore Landscape (conservation area) dating from 1999 (National Estate), 2010 (Commonwealth Heritage List), 2011 and 2012 (National Heritage List) as well as the 2009 National Heritage List nominations for Central Canberra that have been assessed by the Australian Heritage Council and are in the final

stages of listing. The Guardians also notes the potential impact on the significant heritage vista of Australian War Memorial and Anzac Parade. The aesthetic importance is based on the scale relationship of the heritage-listed Portal Buildings with National Heritage Listed Australian War Memorial and Anzac Parade in their setting at the base of Mount Ainslie that creates the nationally significant vista. This vista could be spoilt with the additional heights of buildings replacing the Portal Buildings.

The Guardians also wish to inform you that it is currently preparing renominations for Lake Burley Griffin and Lakeshore Landscape for the National Heritage List and the Commonwealth Heritage List.

Sincerely

Lake Burley Griffin Guardians



Juliet Ramsay Convenor Lake Burley Griffin Guardians

Contact address:

c/- 13 Lincoln Close

Chapman ACT

cc.

The Hon Paul Fletcher MP

Minister for Territories, Local Government and Major Projects

The Hon Greg Hunt MP

Minister for the Environment

Proposed Amendment to the National Capital Plan (NCP)

This proposed amendment to sections of the NCP is focused on the City Hill Precinct and West Basin Precinct. A general critique covering issues that would be the outcome of the development is followed by specific recommended changes, shown as deletion lines through text, additional words in italics or a note for collective deletions.

4.6 City Hill

General Critique

We do not agree that City Hill is the metropolitan or activity centre of Canberra City.

City Hill forms one of the symbolic vertices of the National Triangle which still exists. City Hill should retain its role as a vertex of the National Triangle as does Parliament on Capital Hill and retain that importance in its urban expression. In the historic urban structures of Canberra, City Hill is a landmark site. Historically it was intended as the site for a centrally located Town Hall. City Hill was reserved by Walter Burley Griffin as a landscaped landmark of Canberra, a role that was continued for many years by the Federal Government while it was the sole administrator of Canberra. This historic landscape, the vertex marked by a flag mast and a crown of trees, remains today. It is a magnificent terminus for Commonwealth Avenue from the south and Northbourne Avenue from the north - the equal of any landscape terminus in the world's great cities. The Guardians believes the crown and its vertex must not be lost in the general spread and height of apartments and office buildings.

The Guardians does not oppose infill architecture or some densification of the existing city, but buildings around Vernon Circle should be less than 6 storeys so that the crown of trees and the flagpole can be visible in all vistas. We agree that there needs to be safe pedestrian access to City Hill in specified locations but we are concerned with the notion to reduce traffic in Vernon Circle and thereby encourage more traffic in London Circuit.

Of great concern is the adoption of the idea that 'landmark' buildings of 18 storeys at the end of the major avenues will frame and enhance vistas. This premise of enhancing a vista by channelling the view has visibly failed at Constitution Place. Furthermore limiting the vistas to the centres of avenues impedes and damages all other angled views of City Hill. The landmark buildings will certainly conflict with the aesthetics of the design proposed for the Canberra's Convention Centre. We believe the look of City Hill with these spaced towers will give City Hill an appearance of an industrial site with spaced chimneystacks or a concrete cake with concrete candles.

A far better way of emphasising the importance of City Hill would be for the proposed landmark building sites to have a sweep of selected plantings that will capture the eye and lead to City Hill's green space instead of building towers.

We strongly note that the urban mass and urban edge of 8 storey high buildings proposed for West Basin will damage the expression of City Hill as a significant landmark feature and create a blurred and sprawling urban mass with no urban form.

We therefore believe the planning concepts for City Hill Precinct Code are damaging to Canberra and its national importance.

4.6.2 Background

City Hill Precinct is the municipal heart of central Canberra.

4.6.3 Objectives for the City Hill Precinct

1. Maintain and promote the City Centre (Civic) as the main commercial centre of Canberra and the region – with the City Hill Precinct as the pre-eminent heart of City. *retaining its planned urban importance as a vertex of the National Triangle.*

3 That the City Hill Precinct provides a vibrant, interesting and lively centre with high levels of human activity.

4.6.5 Building Height

Building heights of up to ~~25~~ 16 metres (generally *four to five storeys*) above adjacent kerb levels of *Vernon Circle* and *buildings no higher than that level* at ~~of~~ London Circuit, ~~Vernon Circle~~ and Northbourne, Edinburgh, Constitution and Commonwealth Avenues are permissible in all areas of City Hill Precinct.

~~Landmark buildings up to RL 617 (generally 14–18 storeys) will be restricted to the corners of the main avenues intersecting with London Circuit. See Figure 40.~~

All following planning documentation for 4.6.5 to be reworked.

Heritage

The heritage values of the Sydney and Melbourne Buildings are to be considered and addressed by new buildings adjacent to these sites.

Add:

The heritage significance of City Hill as a vertex of the National Triangle to be respected in surrounding developments.

4.7 West Precinct Code

General critique

Planning dating back to aspects of the Griffin legacy is seriously damaging to Canberra. This was noted in submissions on Amendments 56, 59, 60 and 61 by the Walter Burley Griffin Society in 2006 and in other submissions and media comments by eminent Australian planners. The proposal has also been strongly criticised in the recent months in submissions to Amendment 86 to the National Capital Plan (NCP) and media articles.

The Guardians notes that the proposed West Basin building estate proposal will:

- blight the significant national route of Commonwealth Avenue to Parliament House by blocking much admired vistas from Commonwealth Avenue across the lake to the Brindabella and Bullen ranges;
- blight the vistas of the lake with its continuous lakeshore landscape from Capital Hill and Black Mountain;
- appropriate an important area of public open space that is far more valuable as an open space resource than residential and commercial buildings as it can relieve the stress on Commonwealth Park and provide a venue for events;
- unbalance the city form, creating an unnecessary isolated city component that will conflict with the city expansion to the east and north;
- conflict with a clear urban expression of City Hill;
- block public access to the lake and conflict with the Griffin's plan for a

continuous public access to the lake foreshore as continuous open space;

- conflict with the heritage values of West Basin public space as designed in the W.B. Griffin plans of 1913 and 1918;
- West Basin is a component of Lake Burley Griffin and Foreshores Precinct Item 4.12 and should follow the precinct codes as set out in that Item.

All referencing to a Griffin legacy, Griffin grid, Griffin shape is a flawed premise that cannot be substantiated by facts and appears simply as a ruse to enable development. This flawed referencing in the NCP damages the prize-winning planning and development of the lake by the National Capital Planning Authority and besmirches the professionalism of this important planning document and the ensuing planning process.

4.7.2 Background

~~The area will create a new city neighbourhood, extending the city to the lake with a cosmopolitan mixture of shops, businesses, cafés, recreation, tourist activities and accommodation.~~

4.7.3 Objective for West Basin

The Guardians supports a wide promenade, with a continuous open space zone around the lake and continuous tree planting but there is no sound reason for the infilling the lake and constructing a walkway in the lake other than to provide more land for the building estate. The basin is not Griffin's shape and infilling makes even smaller the basin the Griffin's designed.

- ~~• Create a legible network of paths and streets by extending the city grid of streets and paths to enhance connectivity and accessibility to the lake.~~
- ~~• Develop a built environment which demonstrates design excellence.~~
- ~~• Develop West Basin precinct with a mix of uses and create a public domain which demonstrates urban design excellence.~~
- ~~• Develop West Basin precinct with a mix of uses and create a public domain which demonstrates urban design excellence.~~
- ~~• Develop a significant public building, cultural attraction or landscape space on the water axis on the western shore of West Basin.~~
- ~~• Ensure new development meets best practice for environmental sustainability including energy efficiency and water sensitive urban design measures.~~

Delete all of Items 4.7.4 and 4.7.5.

Heritage

~~Create a public waterfront promenade reflecting the geometry and intent of the 1918 Griffin Plan.~~

The waterfront promenade is but a fragment of the Griffin's geometry. It has no authenticity or integrity in terms of heritage.

The planning for:

Landscape/Streetscape
Waterfront Promenade
Cycle ways and Ferry
Active Frontage
Road Hierarchy

and associated figures all need to be revised and amended to cater for revised planning for West Basin that retains public open space and avoids the planned blighting development.