



LAKE BURLEY GRIFFIN
GUARDIANS INCORPORATED

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National Capital Authority - Plan Team
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Canberra ACT 2601

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Dear Plan Team

Comments on Acton Peninsula Precinct Draft Structure Plan

Acton Peninsula is a most important cultural landscape component of Lake Burley Griffin, a nationally significant Australian cultural landscape. Lake Burley Griffin Guardians note that the whole of Acton Peninsula and West Basin are within the Designated Area, meaning the area has national significance. As well, the whole of Acton Peninsula and West Basin lie within National Capital Open Space System signifying their importance as national capital open space.

The Griffin Legacy planning principles expounded by the National Capital Authority for the *City to the Lake* development have been ignored in the Structure Plan. The Guardians stress that this Structure Plan particularly the West Basin component needs to be reviewed and reworked along with the *City to the Lake* plan. A review is the recommendation discussed under Items 4,5 and 6.

1 Community Engagement and Social Importance

There are several community groups and individual community stakeholders who have direct association with the former hospital and hospital buildings, and with the early Acton housing that should be involved in all planning. Planning should commence with documenting what people value.

Recommendation 1:

1.1 Undertake basic planning research with the cross section of stakeholders and individuals with strong historic association with the Peninsula, including Indigenous groups and those associated with the Hospital buildings and early Acton housing.

2 Heritage

The *Acton Complex Heritage Management Plan* (draft) 2015 is limited to a desktop study of heritage features of the southern end of the peninsula. All statutory and indicative heritage places in the zone covered by the Draft Structure Plan should have been identified in the 'desktop' document. At present they are not. A key omission is the Acton Conservation Area

and, as a consequence, the values of this Commonwealth Heritage listed place are not considered or respected in the proposals as they should be.

The ACT Government's recent performance and the ANU's demolition of Bruce Hall demonstrate that at least two of the Acton Peninsula Partnership players have little regard for heritage values.

The *Acton Complex Heritage Management Plan* notes that the peninsula would have been a focal area for the local Indigenous people but the landscape has been greatly disturbed and therefore artefacts would have not research potential. However, the ANU area has many undisturbed spaces where many artefacts have been found and historical records note that the area belonged to the Ngambri Black Mountain tribe who held a corroboree in 1846.

Historic importance must be respected. The former hospital buildings have the link back to Griffin's intention for the peninsula and should be conserved and hopefully reused in a way that respects their hospital heritage. We note that the the memorial to the hospital was opened on 27 November 2006 recording the 50 years of the Hospital is a heritage feature and the Commemorative area to remember Royal Canberra Hospital should be conserved.

The Acton Conservation Area is an intact urban precinct dating from the 1911-29 period when this area was the administrative, residential and social centre for the design and construction of the new national capital. It is described in its Commonwealth Heritage citation as 'the most extensive surviving historic cultural landscape of that period'.

The Guardians strongly note that there is no heritage listing of Lake Burley Griffin and its lakeshore landscape and that this is an absolute travesty.

Recommendation 2:

2.1 Prepare or compile a combined heritage analysis that includes the Peninsula's ANU complex so that the whole area is considered according to its heritage layers and their significance.

3 Vistas, Views and Aesthetic Importance

The aesthetic evaluation that should be part of the area's heritage is limited to the historic buildings and individual trees. An analysis of the entire peninsula for its importance as a vista terminus and a viewing point, the aesthetic experience of the place and the interaction of culture and nature is needed to upgrade the heritage data. Recognition of the importance of the silhouette of the peninsula, and its role as a tree-canopied area extending from Black Mountain, is needed to direct future planning.

Recommendation 3:

3.1 Prepare a professional aesthetic analysis of Acton to guide further planning of Acton Peninsula. As well consider the significance of strategic and local views. Refer recommendation 9.1.

4 Acton Peninsula as a Important National Cultural Destination

Acton Peninsula should be upgraded as a great visitor destination. A landmark cultural building interpreting the historic and heritage values of the area and Canberra in general would complement the National Museum and draw more visitors to the area. The opportunity to have West Basin as a welcoming point with some cafes and services, some parking, electric people movers, public bicycles cannot be underestimated.

As previously noted, West Basin lakeshore is within the Designated Area zone because it has national significance. The land was planned by WB Griffin and developed by Menzies' NCDC as National Capital Open Space and should remain as such to retain the heritage of our lake landscape and the beauty of the basin surrounded by a green parkland perimeter.

The success of the Acton Peninsula Precinct proposal will be seriously blighted by the proposed *City to the Lake* (CttL) West Basin development to its east, which involves privatising lakeshore land. Furthermore with regard to the Building Estate, there has been, no heritage impact study, no social impact and no public consultation.

Recommendation 4:

4.1 Conduct a review and replanning of the entire West Basin to ensure heritage aspects including the Griffin planning heritage are not compromised and that a reworked *City to the Lake* (CttL) plan is prepared that will work in the best interests of Canberrans, the Peninsula and the heritage significance of Lake Burley Griffin and its lakeshore landscape.

5 Impacts from West Basin *City to the Lake* project

There is now a serious lack of integrity in around junction of the proposed West Basin Waterfront pedestrian/bike routes with the routes for Acton Peninsula at the north-west area of the Basin shore that demonstrates the lack of sense in the intention to reinstate a so called 'Griffin arc' in West Basin.

There is a proposed 80m of lakebed infill for West Basin (East) and more lakebed infill on the Acton Peninsula shores for a new lakeshore edge. All of this infill reduces the scale of West Basin to almost half the size of East Basin.

The infill of Lake Burley Griffin proposed for the *CttL* prevents a properly formed curved lake edge as Griffin proposed in all his plans. Instead there is an appalling dogleg where the junction of the proposed West Basin Foreshore meets more infill proposed for Acton Peninsula.

Recommendation 5:

5.1 As for 4, a review and replanning of West Basin is seriously needed to address this and other concerns

6 Indicative Development Zones in West Basin and Lake Infill

The development zones for the West Basin Acton Precinct are excessive. They show 6 building blocks in 2 very large zones. The zones squeeze the terraced space of the water axis terraces and appear to extend to the existing lakeshore with infill by at least 10m. Although we understand that these buildings will **all** be public and cultural, as announced by Malcolm Snow on ABC Radio (Adam Shirley 2 May). That fact should be noted in further planning documents including the National Capital Plan.

The Guardians strongly object to all the proposed development in West Basin landscape as it is **in conflict with the Griffin Legacy, a planning principle that should be adhered to.**

The Draft Structure Plan may provide some assurance about development principles (page 30), the ACT Government and ANU controlled sites which align with the water axis must respect the value of the landscape any buildings developed must be minimal and low scale landmark public access buildings. This should be more clearly stated in the document.

Recommendation 6:

6.1 No development planning even at the broad scale should countenanced until a complete and comprehensive review of all of West Basin is undertaken.

6.2 The intention for any buildings in West Basin to be public and cultural should be clearly stated in the forthcoming Precinct Plan and the National Capital Plan.

6.3 Review the development plan to reflect the Griffin Legacy, instate a wider terraced space as shown on Griffin's 1914 and 1918 plans and delete all buildings from the West Basin parklands

7 Circulation and Parking

Circulation throughout the Peninsula is not defined. Parking in front on the Museum is to be greatly reduced and replaced with a car-parking structure. The success of this is in the planning, and how it affects public access is a key question yet to be answered.

The foreshore public access space must be adequate to accommodate pedestrians with a separate bike track, landscaping and tree planting. More walk-through spaces should be created, to provide a greater sense of access/connection to the City. It appears that again there is a proposal to increase the building zones by lake infill.

Recommendation 7:

7.1 A study of the light rail, bus, car, ferries, pedestrians, and bike circulation needs to be clarified prior to further development.

7.2 The building zones should be reduced to ensure adequate walk-through spaces to the city.

8 Height of Buildings

The proposal for 4-6 storey high buildings around the historic ANU buildings of the Acton Conservation Area and Liversidge Apartments should not happen unless they are visually hidden. High buildings along the ridge will destroy the visual setting of the lake and create a high wall of conspicuous buildings, blocking the visual link with Black Mountain.

Recommendation 8:

8.1 Conduct a professional visual analysis to determine strategic and local views of key features such as Lake Burley Griffin, Parliament House, Commonwealth Avenue Bridge and Black Mountain, how the views are framed, and the potential impacts of developments on these key features. This may involve assessment across the visual plane of the lake and the sight-lines beyond to establish the view cones that can indicate if the views can tolerate background buildings.

9 Green Space

West Basin lakeshore is within the Designated Area zone because it has national significance. The land has always been public open space and should remain as such to retain the beauty of the basin surrounded by a green parkland rim that should be conserved for public informal recreation and events.

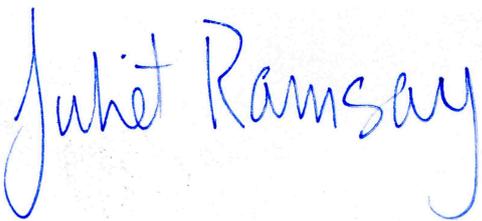
As the concrete building density of the Canberra City area increases, the value of green space in West Basin intensifies. If the highly detrimental plans of CttL West Basin and the Acton Peninsula Precinct Structure plan as proposed go ahead, all the green space in West Basin will be obliterated.

The infill of the lake and a possible public walkway over the water is not recommended. There is adequate concrete walkway at Point Park, Kingston and in the Central Basin. A natural landscape edge is recommended for aesthetic and environmental reasons. A concreted walkway going past the limestone outcrops would be excessively ugly and detract from the heritage values of these outcrops.

Recommendation 9:

- 9.1 Review and amend the plan for West Basin as it appears in the National Capital Plan and the City to the Lake to prevent or reduce the development.
- 9.2 Another concrete walkway and lake infill should not be undertaken.

Yours sincerely



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and members of Lake Burley Griffin Guardians