



Mr Andrew Hastie MP, Chair
Committee Members
Joint Standing Committee on the National Capital and External Territories (JSCNCET)
Parliament House, Canberra 2000
jscncet@aph.gov.au

2 November 2016

Dear Mr Hastie and JSCNET members

This is addressed, to all Members of the JSCNCET to alert you to major concerns regarding Lake Burley Griffin, a feature of national significance in the Nation's Capital that belongs to the people of Australia. The Lake Burley Griffin Guardians (the Guardians) espouses the ideals of a number of organisations, community groups and individuals with the collective desire to protect the integrity of Lake Burley Griffin.

The genius of the National Capital hangs on two major axial design elements: the Land Axis and the Water Axis that cross at rightangles in the Lake Burley Griffin's Central Basin. The Water Axis is expressed primarily in the alignment of the Lake's Basins and extends to Black Mountain. But the Lake system of water and parklands is under serious threat, not from a single catastrophe but by the death of a thousand cuts and our generation is responsible for this vandalism.

Almost on a monthly basis one "good idea" after another emerges or is floated in the public domain. Each of them maybe considered even sensible or desirable. Each of them "only" requires a few hundred metres more of the Lake edge. The danger is that one or more of these eventually translates into reality and the Lake and the Central National Area is further depreciated. This process is accelerating as both the ACT Government and the Federal Government in neglect of their responsibilities, mines the Lake for the short-term cash income it generates, setting a troubling precedent that encourages ongoing urban development of the lakeshore.

Lake Burley Griffin has rightfully earned its place as a significant central feature of the National Capital and this includes a growing world reputation. The lake characteristics were hard earned and must not continue to be diminished by repeated threats to integrity. We must accept that the Griffin Legacy as ammended into the National Capital Plan has failed in the protection of the lake and lake foreshores.

We, our generation, is on track to bequeath to future generations, a foreshore that will cost a huge amount to return to public open space. One only has to look at Sydney and Brisbane as well as many other cities around the world now trying to get good access back to their waterways at huge expense. This is happening now on your watch, and this generation, must assume responsibility to retain the Lake as an unspoiled entity.

To take responsibility and provide at least an intelligent basis for understanding why we are doing what we are doing urgently needs a Statement of Significance that sets out 'what we want to keep' and a Conservation Management Plan on how to protect those values. These protective planning instruments exist for the Sydney Opera House and Adelaide Park Lands developed by their respective Municipal and State Governments, along with the encouragement of important community advocacy.

Members of this Joint Standing Committee, it is your responsibility to halt the unfortunate development proposed for Lake Burley Griffin and its lakeshore parklands and ensure a Statement of Significance for the whole of Lake and its lakeshore parklands is undertaken followed by a Conservation Management Plan — now.

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Comments on current issues

Lake Burley Griffin and its parklands is the most outstanding designed landscape in Australia and a place of pride to Australians. Currently, the Lake's West Basin is under threat from the well-advanced City to the Lake (CttL) proposals. Like the Immigration Bridge, this is a similarly flawed proposal derived from the Griffin Legacy. It will create severe detrimental impacts on the Lake as a whole. It is these impacts and the flawed processes giving rise to them to which we draw your attention in the summaries below:

1. Blocking of vistas across the lake to the mountain ranges

Lake Burley Griffin's perimeter of parklands provides a linear setting of the lake. It continues the plane of water and links the lake vista to the surrounding hills. This perimeter of parklands was a continuing vision for Lake Burley Griffin completed in 1963 and now highly valued by Australians.

Commonwealth Avenue is the nation's iconic route to Parliament House. It is travelled by hundreds of visitors and it is the ceremonial route taken by visiting international dignitaries. The proposed West Basin Estate (a neighborhood of buildings for private apartments and some businesses), part of the City to the Lake (CttL) scheme will create a dense six storey high mass of buildings abutting Commonwealth Avenue and blocking vistas of the lake from Commonwealth Avenue extending from Vernon Circle to Albert Street (near the Commonwealth Avenue Bridge) a length of approximately 650m. Apart from the blocking of vistas the mass of buildings will look appalling from the lake's south side and be in the face of those travelling northwards from Commonwealth Avenue Bridge.

Such occlusion of vistas is incompatible with the national character of the Lake and parklands' space that is part of the National Capital Open Space System.

2. Appropriation of public parkland for sale to private developers

The proposed West Basin Estate will deprive Canberrans as well other Australian of greatly needed recreation and socialising park space that was always part of the Lake Burley Griffin plans by the Griffins and later by Prime Minister Menzies' National Capital Development Commission (NCDC). Once sold the important parkland space is gone forever. Along with the parkland is the loss of any opportunity for siting public facilities or small public institutions in the Basin's space.

The proposed exposed concrete promenade and waterfront complex extends to a length almost 700m and up to 80m into the lake waters from the existing lakehore. The CttL plan shows insufficient tree cover to moderate the climate and a cold exposed southerly aspect. This proposed waterfront is a mere token offering and no recompense for the loss of the existing park area with its existing trees, its lawn spaces, its public accessibility, lake edge picnic areas and the way it contributes to parkland delineation of the Lake's perimeter. It denies future options for a much improved parkland and recreational facilities.

There is no public parking area on the CttL plan, making access to using the proposed waterfront and its two small parks at either end, difficult for visitors and Canberrans particularly those with small children or other mobility concerns.

3. Lake infill and reduction in the size of West Basin

The proposed infill of a segment of the lake will reduce the size of West Basin's waters by around 10%. Its reduced area will be close to 50% of East Basin's size. The urban building mass commencing on the infilled area creates an imbalance of lake perimeter open space with the intrusion of the large building mass that was not present in the lakeside space of the brilliant plan by the Griffins nor in the award winning NCDC works that created the Lake. Apart from the 50m wide waterfront development the CttL scheme covers the entire Acton Park area in a mass of buildings with a network of roads and a proposed huge aquatic centre. Refer map of the proposed West Basin development at Attachment A.

4. Lack of heritage protection.

While the Commonwealth has undertaken a heritage assessment for all of central Canberra this has been held in abeyance since 2013 due to the absence of ACT Government support.

There is no whole of lake and parklands heritage protection, management or master plan.

Since Amendment 86 of the National Capital Plan, the entire lake and its lakeshore landscape is

now eligible for a full assessment for the Commonwealth Heritage List. It is the National Capital Authority's responsibility to ensure this is undertaken by extending their nomination for *Lake Burley Griffin and Adjacent Lands* to include **all** of the lake waters and lakeshore landscape.

5. Unsatisfactory responses by the National Capital Authority (NCA) regarding consultation on heritage impacts

The Guardians in good faith provided a detailed submission on the West Basin waterfront development—Works Approval No. 20108, on 8 October 2015. Although the NCA's Consultation Report was dated November 2015, the Guardians was not given access to a copy until 8 September 2016.

We emphasise that submissions responding to Request 20108 on the waterfront development were received from Australia's foremost heritage organisations: the National Trust of Australia ACT (850 members), the Australian Garden History Society (1709 members) and Australia ICOMOS¹ (645 members) along the Lake Burley Griffin Guardians (70 members). The combined membership of these groups is 3274 including households and corporate memberships. All were opposed to the building estate development. Three organisations were concerned that only the view impacts of the waterfront development were considered and not the views impacts resulting from the structural height and mass of the proposed buildings in the West Basin Estate. Yet these significant concerns have been ignored and the NCA has been liaising to have the Commonwealth transfer a segment of their lakebed title of to the ACT Government to accommodate the waterfront infill that will support the foundations for part of the Estate.

We consider that Request 2018 involved only the early stages of the full proposal with little reference to Stage 2 (West Basin Estate) and subsequent Stages such as the bridging of Parkes Way. Planning for any one Stage cannot be valid without considering interactions between and relevance to other Stages and their total impact on the Lake Burley Griffin complex.

6 Unsatisfactory community consultation

At the Guardians Public Meeting in July this year, the meeting venue was packed and overflowing with 250 community members absolutely opposed to the development. As well the Guardians petition comprising 606 signatories, mainly from visitors to West Basin were also totally opposed to the lack of protection of Lake Burley Griffin and its parklands and the appropriation of the parklands for private apartment and business development. The petition was mailed to Parliament on 24 October 2016.

While some people are aware of the waterfront proposal most people petitioned at West Basin had no knowledge of the proposed building estate, partially on lake infill and extending throughout most of the parkland. Although the NCA claims it has undertaken extensive consultation over a long period of time, we have requested copies of their consultation reports and received none. Consultations undertaken for the Griffin Legacy and Amendment 61 are well over a decade old and their relevance today is obsolete.

The information provided to the general community over the last three years has shown no elevation images of the buildings of West Basin Estate that can enable the community to understand and consider the human scale against the height impact alongside Commonwealth Avenue and how the buildings block relevant vistas.

Furthermore, having spent much time running information stands in the Acton Park area of West Basin, we note that its users and they are many, love the park, its meadow like grassland areas, soft water edge, its informality and low key ambiance. Visitors and locals visit West Basin for barbeques, picnics on the lake edge grasses, walking, bike riding and other activities.

7 Environmental concerns

Acton Park (the West Basin parkland) had its zoning changed to 'urban residential' sometime after the National Capital Plan's Amendment 61 and the park has had only basic management since, the

¹ ICOMOS - International Council on Monuments and Sites
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more to justify its eventual replacement. Similarly, the futsal courts, not used for competition play for over a decade, have had no landscaping improvement. The infill for Point Park boardwalk works (now in progress) and the proposed main waterfront infill works could affect the sensitive water quality balance of the West Basin. Protecting the lake from algal blooms, exacerbated by inflow of nutrients in flood time and poor water circulation at other times, is an ongoing concern for groups like Waterwatch ACT and is costly to rectify. We are also concerned about the proposed building mass storing heat that will contribute to the city's heat island effect and night sky pollution.

8 Grevillea Park

Although all of the above points relate to West Basin, Grevillea Park in East Basin has been gazetted into four blocks by the ACT that are now being advertised for four large boat shed sites although to our knowledge, the NCA has only approved two boat sheds sites. When and if built these boat sheds will occupy most of the park space — completely obstructing the waterfront for community informal use, let alone larger events such as veteran car and caravan displays.

Our Request

Our nation is rapidly losing the characteristics that make Canberra a phenomenal city, the pride of our nation and a city that is comparable with the best cities in the world. We request your strong intervention in stemming the loss with regard to Lake Burley Griffin and national significance.

We urge you to reverse the inappropriate proposal to develop West Basin:

- by blocking the transfer of lakebed title for the proposed infill, and
- by reinstating the public open space parkland zoning.

To assist in achieving this we request you to undertake the preparation of a:

- a Statement of Significance and a Conservation Management Plan, and
- a comprehensive Master Plan.

These measures, treated as matters of urgency, will ensure retention of the Lake's full national significance for all Australians. This will require a political will with much greater resolve than thus far displayed.

This letter is prepared by members of the Lake Burley Griffin Guardians and is submitted on behalf of the group. A map of West Basin at Attachment A shows the outlines of the proposed development. The Guardians would be happy to answer questions or provide further information if requested.

Information available on-line includes:

Transcription of the Guardians public meeting: <http://lakeburleygriffinguardians.org.au/media/LBGG-meeting-proceedings-2-15.8.pdf>

Heritage report: <http://lakeburleygriffinguardians.org.au/media/LBGG-Heritage-Report-12-June-2016.pdf>

Lake Burley Griffin Guardians' objectives: <http://lakeburleygriffinguardians.org.au/our-mission-and-objectives/>

Yours sincerely



Juliet Ramsay, Max Bourke AM and David Mackenzie
Convenor, and members Lake Burley Griffin Guardians



The Proposed West Basin Development map, showing outlines of the proposed development elements over a Google Earth image