



Mr Malcolm Snow
Chief Executive
National Capital Authority
Plan.Review@natcap.gov.au

Dear Mr Snow

**Review of the National Capital Plan 2015
NCP Amendment 86**

The Lake Burley Griffin Guardians (the Guardians) appreciates the opportunity to comment on the the National Capital Plan (NCP) Amendment 86. We also appreciate the meetings with NCA planners that have helped in our understanding of the planning process.

The report represents as an improvement on the layout of the existing version of the NCP and we congratulate the National Capital Authority (NCA).

The Guardians has as their focus, the planning, management, usage and protection of Lake Burley Griffin (the Lake) and landscape setting. Our concerns include the Lake waters, the setting landscape that encircles the Lake and the values imparted by the Lake in terms of vistas, most of which are captured in the Designated Area, land dedicated to be of National Significance.

We believe the whole of the Lake and its lakeshore landscape setting should be protected from development and managed by the Commonwealth Government. We also comment on development proposals within the National Triangle and some nationally significant areas.

The following submission from the Guardians includes comments on the Consultation Report as Part 1 of our submisison, while in Part 2 we include comments we did not make to the Exposure Draft and we return to a number of our comments even though they were regarded in the Consultation report as outside the scope of the current review. We reiterate these comments because they are relevant to the broader review of the NCP and they emphasise our deeper concerns about this planning instrument.

Our comments on the Review of the National Capital Plan, Amendment 86, follow.

Yours sincerely

A handwritten signature in blue ink that reads "Juliet Ramsay".

Juliet Ramsay (convenor), David Mackenzie, Andrew Schuller and Mike Lawson
on behalf of Lake Burley Griffin Guardians

13 November 2015

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Lake Burley Griffin Guardians NCP Amendment 86

Part 1

Comments on Consultation Report on the National Capital Plan Exposure Draft

1. Previously we commented on parts of the plan in Exposure Draft DA86 that we now know are not included in these stages of the review. It would have helped if the aims and objectives were more clearly articulated in the letter sent on 26 May even for example, noting sections of the plan not under review. From comments in the consultation report for DA86 it is obvious that many stakeholders beside the Guardians misinterpreted which details were under review.
2. All of the LBGG comments (at Attachment A of the *Report of Consultation on DA 86*) relating to the planned detrimental West Basin and City Hill developments have been marked in the Report with the comment:
Review of detailed policy for West Basin and City Hill is outside the scope of the current process.

We were perplexed to learn from the *Report of Consultation on DA 86* that reviews of precinct codes and policies had been excluded from this planning review with no indication of and when reviews would occur. We have subsequently discussed this matter with your planners.

3. Regarding the Guardians' comment on Section 4.1.1, you provide 2 comments.
'Future stages of the Plan review offer the opportunity to review this policy.'
and
'Adoption of the recommendations of reports by the Joint Standing Committee on the National Capital and External Territories is outside the scope of the current process.'

The NCA comments appear to be contradictory and we invite clarification.

4. The NCA responded to our comment on the importance of vistas and open spaces, noting that the Plan stipulates the conservation of major vistas and open spaces.

The Guardians are dismayed that this policy has not been followed regarding the the vistas of West Basin from the most important route of Commonwealth Avenue. We stress that it is almost 10 years since Joint Standing Committee on the National Capital and External Territories approved amendments to the NCP with policies to develop West Basin. This was flawed planning that will adversely impact the parkland space set out in the Griffins' 1911 plan, WB Griffin's 1913 and 1918 plans and established in the prize winning lake construction, by the National Capital Development Commission.

Building height limits and mass along the west side of Commonwealth Avenue will be so great as to create a lop-sided southern exposure from Capital Hill and will destroy the vistas to the Brindabellas from Commonwealth Avenue Bridge. As well, building heights in West Basin, on Parkes Way and Commonwealth Avenue are not protected from encroachment to the maximum allowed, because the wording of the plan does not specify the maximum number of floors permitted above natural ground level. This will permit the ACT Government to build 25 metre high apartment and office towers around and on top of Parkes Way while offering little scope for public open space in West Basin. The building estate concept appears to be in a style similar to Kingston Foreshore with crowded in buildings, inadequate and poorly thought out public spaces, and poor parking, but having buildings at a greater height and with more overshadowing.

The development proposal of 6-8 storey-high buildings will impact vistas across the lake from Commonwealth Avenue recognised in the NCP as one of the Griffins' grand avenues. It will also obliterate public parking required for sizeable events in Commonwealth Park and alienate valued public parkland forever. Regardless of the concept having been agreed by Parliament in 2006, they are flaws in the NCP and must be addressed.

The whole West Basin development should be put on hold until the NCA and ACT Government have engaged in a thorough and proper public consultation about the entire precinct, not just the piecemeal approach based on vague artists drawings which has been a feature of planning in this area to date.

The proposed NCP Amendment 86 must provide for master planning of precincts as a pre-requisite for development such as in West Basin.

5. The NCA responded to our comments on Section 2.4:
Listing of heritage places is the responsibility of other agencies and is outside the scope of the National Capital Plan.

While this is correct regarding Commonwealth Heritage Listing, under the *EPBC Act 1999*, the NCA, as a Commonwealth agency, has the responsibility of preparing its own heritage register and the identification and management of heritage values of Commonwealth properties. We seek confirmation that the NCP will be in conformity with the protection of Commonwealth heritage values according to the *EPBC Act 1999*.

6. Regarding the Guardians' comments on Section 3.1.5 General Policy Plan Metropolitan Canberra, our submission clearly referred to the planned development near the Molonglo River between Oaks Estate and Piallago given that the Guardians is concerned for water quality in the Molonglo River and existing heritage sites in the area.

We do not understand why the NCA incorrectly interpreted that area as the proposed Majura Valley development. The Guardians is opposed to the removal of special requirements on the Molonglo River area.

7. With regard to Guardian's comments in 3.3.1- 3.3.2 we note the NCA comment in Attachment A that states comments on West Basin and City Hill is outside the scope of the current process.

The Guardians is clearly noting that the proposal for a component of the commercial/business part of the city in West Basin is also flawed. Civic (City) has organically spread to the north with well advanced plans to go even further. New works along Constitution Avenue will allow Civic to spread further eastward. Its business model is already suffering and is threatened by extension to West Basin that is not in the interests of Civic and future generations of Canberra citizens.

Despite having no specific heritage listing, Lake Burley Griffin is nationally significant and its lakeshore landscape is a critically important waterfront landscape that encircles the Lake and consolidates the Lake's beauty. The West Basin landscape space holds great potential for future landscape improvements that could be priceless additions to the Lake's value. West basin is essentially a necessary open and parkland space for use by Canberra citizenry and its visitors, now and in the future, not to be sacrificed.

8. We appreciate the proposal for a master plan for Lake Burley Griffin and Foreshores (Consultation Report 3.3.4). We note that the Lake Burley Griffin and Foreshores Precinct Code as shown at Figure 111 is at odds with a whole of Lake Master Plan and any ensuing Management Plan. We make further comment in Part 2 under s4.12.

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Part 2: Comments on the National Capital Plan Review (NCP), Amendment 86.

Introduction

The Guardians believes that the role of national functions and maintenance of nationally significant features is critical for Canberra. We believe that these functions should always be controlled and closely scrutinised by the Australian Government (1.1 Matters of National Significance, page.12)

We support the purpose of the plan in establishing matters of national significance as broadly described in the dot points.

- The pre-eminence of the role of Canberra and the Territory as the centre of National Capital functions, and as the symbol of Australian national life and values.
- Conservation and enhancement of the landscape features which give the National Capital its character and setting, and which contribute to the integration of natural and urban environments.
- Respect for the key elements of the Griffins' formally adopted plan for Canberra.
- Creation, conservation and enhancement of fitting sites, approaches and backdrops for national institutions and ceremonies as well as National Capital Uses.
- The development of a city which both respects environmental values and reflects national concerns with the sustainability of Australia's urban areas.

In particular we stress support for the second dot point and note that *all* of the lakeshore landscape should be safeguarded for National Capital character and setting. Although we also support the third dot point, we note that more care is required in defining the key elements of the WB Griffin 1918 plan: we believe these have been seriously distorted with regard to Lake Burley Griffin in versions of the NCP and the consolidated NCP 2014.

In our opinion the Lake broadly reflects the 1918 WB Griffin vision but its reality and detail came long after Griffin through the 1964 NCDC plan which allowed Griffin's vision to shine through. The NCDC work that established the Lake and landscape is an outstanding landscape design and construction achievement. It received an award in 1986 and that plan should be neither obfuscated nor diminished.

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Objectives of the National Capital Plan

The Guardians supports the objectives and notes that the second dot point has a direct link to 2.4.4 (page 20) and the Guardians' comments in that item.

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1.2 Designated Areas

The four main elements of Griffins' design as set out are appropriate but should include the land and water axes that are a fundamental component of the urban structure. As well, an expansion of the the fourth dot point is noted.

Recommendation 1: include the following amendments to the Griffins design elements (noted in bold).

- a geometric plan **with land and water axes and a central triangle** formed by grand avenues terminating at Capital Hill, the symbolic centre of the nation
- a system of urban centres **connected by radial avenues and a low level horizontal urban form at Civic Centre.**

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There is continual use of the term 'Lake Burley Griffin and its *Foreshores*'. There is no definition for the term 'Foreshores' in the appendix of the plan nor in the *PALM Act*. It could mean just the land water interface or include all the lakeshore landscape. A definition is required.

Recommendation 2: The term 'foreshores' be defined to mean all of the public lakeshore landscape encircling the Lake, between Lake waters and established property and roadway boundaries.

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2.3.2 Principles for Environmental sustainability and open space (Objective one)

The landscape of the Griffins' design for the Nation's Capital was to invoke an environmental quality which is a key feature of Canberra's character. Conserving and enhancing this landscape setting is important in retaining the character of the National Capital.

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 and healthy water that sustains a diverse and healthy ecology. 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 Guardians appreciate that 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.

The Guardians noted comments in the Consultation Report and we appreciate that a water quality management plan exists (2011). However we believe lake water health is critical to the functioning of the Central Canberra and the Designated Area and we reiterate our recommendations that relate to the comments made on the Exposure Draft:

Recommendation 3: The Guardians want to see the strong physical and ecological interdependence between Lake Burley Griffin and Jerrabomberra Wetlands emphasised much more definitely in the NCP and in a way that precludes any management or development in either that will impact even lightly on the other.

Recommendation 4: The Guardians want to see much more strength behind the statements relating to the maintenance of a robust and sustainable ecology both in the water column and the riparian surrounds of the Lake and connecting 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 5: The Guardians want to see the problem of poor dilution and

aeration in partially closed embayments addressed much more forcibly in the Plan.

Urban runoff and the pollutants it carries (including leaf fall, pet faeces, rubbish) continues to be costly to manage. Only with clean stormwater runoff is polluted water displaced from the embayment.

Recommendation 6: The Guardians urges that pollutant transport in urban runoff be addressed a good deal more positively than noted in the NCP.

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2.3.4 Principles for Environmental sustainability and open space (Objective two)

As stated in our comments on the Exposure Draft, the Guardians believe landscape views and vistas are an environmental value and major attributes of Designated Area, particularly the vistas and views of the Lake and across the Lake, of the mountains, from the inner hills and to the inner hills. We do not believe the comments in the Consultation Report address the protection of important vistas, view-sheds and viewpoints.

The Guardians does not agree with the NCA comment in the Consultation Report that vistas are enhanced by development. There examples in Canberra where significant vistas have been channeled and reduced by retaining walls destroying view scope and visual movement to the terminus, demonstrating the failure of that principle.

Recommendation 7: insert 'major vistas, view-sheds, viewpoints' into principle 'a'.
a. The hills, ridges, **major vistas, view-sheds, viewpoints** and other major open spaces will be kept largely free of urban development so they can form a natural backdrop to the National Capital.

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2.4.2 Principles of urban design (Objective one)

Principle 'f' can adversely enable development damaging to landscape features. More specific vista, view-shed and viewing point protection in open space areas are required. This may require research and could form part of the Lake Burley Griffin and Lakeshore Landscape Master Plan.

Recommendation 8: remove 'enhanced by development'
f. Vistas to major landscape features shall be protected.

Recommendation 9: More specific comments on the protection of vistas and view sheds are needed in the plan.

The principles set out in 2.4.2 are all about development. Existing developed and undeveloped open space parklands are vital, particularly in the central area of Canberra.

Recommendation 10: Insert a new principle.
Retain and protect open space park areas within the city, particularly all of the Lake Burley Griffin lakeshore landscape.

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2.4.4. Principles for urban design and heritage (Objective two) a, b, c, & d,

The Guardians strongly supports the principles and notes the link to our Part 1, Comment 4 and the NCA comment made in the Consultation Report. Having all the heritage places in the Designated Area considered as Commonwealth and their values protected is a major improvement to the existing fractured heritage management. These

principles will have the consequence of the NCA including in its Heritage Register expanded heritage reports on Lake Burley Griffin and Lakeshore Landscapes as well as the Parliament House Vista landscape including the entire National Triangle and City Hill. In addition the Register should include Commonwealth and Kings Avenues, noted as major Griffin elements (page 14) .

Recommendation 11: Insert additional words (shown in bold) to cover the NCAs full obligation under the *EPBC ACT 1999*.

b. Within Designated Areas, the National Capital Authority will **augment the NCA Heritage Register** and may require Heritage Management Plans for heritage places to meet the requirements of the *EPBC Act 1999*. The National Capital Authority may require Heritage Impact Statements to accompany development applications associated with a heritage place.

The NCA Heritage Register to include entries for (i) all of Lake Burley Griffin and lakeshore landscape and (ii) all of the National Triangle including the Constitution Avenue and all of Commonwealth and Kings Avenues.

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3.2.5.3. Policies for River Corridor (page 35)

We note that 'Lanyon' rather than 'Lanyon Bowl' remains in the text.

Recommendation 12: Lanyon **Bowl** shall be maintained as an important cultural resource providing for public access and use consistent with its national significance.

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3.3.1 Urban Areas

Has the name 'Civic' been officially changed to 'Canberra Central' or is Canberra Central a different place? Item 3.5.1 Refers both to 'Canberra Central' and 'Canberra City' perhaps Canberra City is really 'Civic'. 'Civic Centre' was the name proposed by Walter Burley Griffin and it later became known as the Central Business District of Canberra.

Recommendation 13:

Define Canberra Central, Canberra City and Civic Centre.

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4.1.1. General Policies for the Central National Area

- 1 Protect the Griffins' vision
- 2 Building on Griffins' Vision
- 3 Revitalise the vision with Growth in the Central National Area
- 4 Link the city to the Central National Area
- 5 Extend the City to the Lake

The Guardians has the utmost respect and admiration for the Griffins' 1911 plan and subsequent WB Griffin 1913 and 1918 plans. We note that that there are a number of elements that are successful interpretations of components of the 1918 WB Griffin plan, importantly Capital Hill and Lake Burley Griffin. The Guardians also acknowledges the massive contribution in design and execution that developed physical expressions from the Griffins' visionary plan for the lake that should not be overshadowed.

The long list of generic policies under the guise of protecting the Griffins' vision, building

on the Griffin vision, revitalising the vision, are aspirational but their origin is questionable. They propagate spurious theories that have been perpetuated since the Griffin Legacy and the subsequent NCP amendments. It is time that the entire set of policies is reviewed. For example the design styles described as 'Garden City' and 'City Beautiful' are regurgitated in every planning document without question and although they may be associated with some aspects of the Canberra plan those styles do not cover most of central Canberra particularly the Lake precinct, not as it was planned by the Griffins nor in its actual physical form. The Griffins' style was more brilliant and original particularly with its environmental and topographic influences.

The planning arising from these policies appears to be a grab bag of ideas that are cherry-picked policies to justify development that is destroying Canberra's beauty and most valued features, originating from the Griffins' vision.

It is impossible to respect and support this collection of generic policies such as 'enhancing lake-based tourist facilities and experiences' when the other sections of this plan propose alienating public lake landscape to be filled with strata-titled multi-storeyed buildings that damage vistas from the most significant avenue and destroy public use of the park space. What evidence is there that the public wants a 'vibrant, interesting and lively' lakeshore ('vibrant' meaning the same as 'lively' is used 10 times in the report)? Many people want visual and free access to a tranquil and beautiful lakeshore.

Recommendation 14: The general policies need to be reviewed. While many are satisfactory there are many policies made that are assumptions. All of these policies need to be based on evidence including new evidence that has emerged from research on Walter Burley Griffin and the Griffins work during the last decade.

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4.6 City Hill Precinct

Recognizing that City Hill is Griffin's symbolic and geographical corner completing the National Triangle and is a gateway to the Central National Area. The Guardians is concerned that the National Capital Plan has set a structure for development of City Hill that envelopes the Hill in concrete structures with concrete towers dispersed around it. Such a development proposal is antithetical to the Griffin's vision and intent. While review of a detailed policy for West Basin and City Hill is outside the scope of the current process (Consultation Report), these and other comments about the impact of large buildings on vistas to and from the Lake directly involve the Lake. The Guardians therefore makes the point that they cannot be separated in the context of the Lake's significance to the National Capital concept.

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4.6.3 Objectives for City Hill

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.

Despite, the NCA's comments on the City Hill aspect of the Guardians' submission to the Exposure Draft, that it is 'outside the scope of this planning process', the Guardians is questioning why? We are registering our intense concern particularly for the proposed 'gateway' buildings at the corners of London circuit and all the major avenues. The Guardians notes that the planning for City Hill ignores the NCP policies such as 1.a, 2.a, 2.d., 2.h., and demonstrates a complete contradiction to the potential expressed in WB Griffin's designs for a low-level horizontal city.

The Guardians' is opposed to the general height of buildings being at 6-8 storeys that

will block even the views of the tops of trees and the flagpole.

The Guardians is vehemently opposed to the gateway buildings on Commonwealth and Northbourne and Constitution Avenues. The buildings will significantly block vistas to and from City Hill from public areas around the Lake the everywhere except the centre of the avenues. The gateway buildings on Constitution Avenue and Commonwealth Avenues will be harmful to the vistas of and from the proposed convention design by Massimiliano Fuksas with gently undulating form reflecting the topography — a thoughtful and charming design that would be a welcome relief to what has become unimaginative city architecture.

There is concern that reducing traffic flow in Vernon Circle will force increased traffic into London Circuit and along Constitution Avenue.

Recommendation 15: Best practice urban and landscape design should be pursued to conserve the iconic value of City Hill landmark. The 'gateway' building proposals should be deleted from the plan. The buildings around Vernon Circle should be 4-6 levels.

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4.7 West Basin Precinct Code

4.7.2 Background

Promulgating a Griffin vision for West Basin development lacks veracity. Although Griffin had 2 buildings of undefined height in the area now West Basin, he did not have a neighbourhood of densely packed buildings and instead had an expanse of open space. This area is needed as City space.

West Basin

The Guardians is very concerned about the proposed West Basin development as part of *City to the Lake* (CttL) as we have noted in Part 1 4 & 7 of this submission. The development will be seriously detrimental to Canberra's most important Avenue — Commonwealth Avenue and its viewsheds.

The proposed development is contrary to General Policies for the Central National Area 4.1.1. 1.a., 1.c., 2.a., 2.b., 2.d. , landscape spaces), 3.a., 3.d. The intention of the development is blatant exploitation for strata titled revenue, packaged in 'Griffin spin'. The proposed development of West Basin ignores Griffin policies with the exception of the proposed foreshore promenade that follows a segment of the Griffin arc. Allowing the packing in of buildings behind the foreshore is hostile to Griffin's open space area and defies the concept an open space.

The development is intended as a revenue base justified without basis by falsely interpreting Griffin at the expense of open space. The proposed development (the 'West Basin Estate') should be abandoned in favour of open space, allowing only the buildings that provide the services necessary to support it or consideration of a national cultural building. This entails the removal of Land Uses A and B and the invasion of public open space shown in Figure 53, p136.

The proposed West Basin forced development doesn't work for Civic which has an enclosed character deliberately constructed without connectivity with the Lake. The Civic principle will be the loser as the current (historic) centre of Civic will be conflicted by the City to the Lake (CttL) or, City to West Basin. Figure 67 page 149 (not present in previous editions of the plan) clearly shows the distortion of the city's urban form with the satellite city component at West Basin and the urban impact into the Lake parkland

space as well as the strip of mid rise buildings along Commonwealth avenue blocking vistas.

Recommendation 16: Further research is needed to resolve the conflicts between the respective commercial and retail areas of West basin and Civic. All building structure proposals at West Basin should be stopped.

Recommendation 17: If the buildings proposed for the public open space in West Basin cannot be disallowed by this planning process then alternative legislation may be required to reject the policies and precinct descriptions that are allowing the development.

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Anzac Parade Buildings Height and Form

The Portal Buildings are listed in the Commonwealth Heritage list as part of the Parliament House Vista extension with values thus:

- Background buildings in a monumental style that functioned both as symbols of government and Australian unity.
- For their associational history with the NCDC and Canberra's post WWII development under the NCDC reflecting the need for emphasising the formal composition of Griffin's plan.
- They carry the Canberra tradition of stripped classical architectural style.

As strong handsome symmetrical buildings, the buildings contribute to Anzac Parade vista rather than detract from it. The buildings should not be reconstructed as high bookends to Constitution Avenue. At those expanded heights they will be visual distractions on Anzac parade and detract from the significant land axis vista terminus, the Australian War Memorial. Further, they will disrupt the view of Parliament House from Mt Ainslie.

It is important to maintain the identity of the points of the Parliamentary Triangle and the symmetry of Anzac Avenue. Recognising that tall buildings are at Russell and at City Hill, a 'portal' of high buildings at the base of Anzac Avenue may detract from the structural height integrity of the base of the triangle by creating a height bumpel in the building form level.

The heights proposed for buildings at the southern end of Anzac Avenue/Parkes Way is too generous and would have the effect of diminishing the Australian War Memorial as seen from the southern side of the lake. As the AWM building and Anzac Parade vista are national treasures, this must not be permitted.

Recommendation 18: The most desirable outcome would be if the buildings could be refurbished for new uses. If that is not possible the buildings should still remain as 25m high buildings, retain their symmetrical strong portal image in plan, scale, form and not be reconstructed as 35m high buildings. They should remain sitting in a park-like landscape.

There is a need to balance the heights, mass and design of buildings at these the key points the vertices of the National Triangle so that the land axis intersection does not appear as a mid point hiatus in the triangle geometry.

4.12 Lake Burley Griffin and Foreshores Precinct Code

The Guardians welcomes that the NCA is proposing a Master Plan for Lake Burley Griffin and Foreshore landscapes as set out in the Consultation Report at Item 3.3.4. The proposal suggests that the review of Precinct Codes will commence once the new format and structure of the Plan is in place, and the 'Lake Burley Griffin and Foreshores Precinct Code' will form an early stage of Precinct Code review.

The purpose of the plan is to identify character, quality and the relationship of components of the Lake. All of the significant landscape that is used by the public containing the bike path and walking paths, the developed parks, the wetlands and narrow landscape strips that encircle the Lake, strongly contribute to Canberra's beauty, vistas to and from the lake and public use that must be included in the master plan delineation. Therefore the delineation of the Lake Burley Griffin Foreshores Precinct of Figure 111 is not an appropriate base for a master plan and consequently any Management Plan as most of the significant lake landscape is excluded.

Management plans involving management strategies will extend over a large area comprising many diverse land uses and often complex situations, probably requiring a nest of plans. The Guardians stand firm on the concept of a 'whole of Lake' Master Plan and this includes recognition of the Lake as the receiving point for all discharge from its total catchment, no trivial matter.

Recommendation 19: The Guardians strongly insist that a review of the Lake Burley Griffin Precinct Code that must be linked with consideration of whole of Lake Master Plan framework.

Recommendation 20:

The entire Lake and its foreshores landscapes should be entered in the NCA Heritage Register and nominated to the Commonwealth Heritage List and the National Heritage List. The heritage values should form the basis for the master plan and protection policies.

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Lake Burley Griffin Guardians, Contact: lakeburleygriffinguardians@gmail.com