



SUBMISSION 11



Royal Australian Planning Institute
ACT Division
PO Box 1491
CANBERRA ACT 2601

DRAFT AMENDMENT NO 39 TO NATIONAL CAPITAL PLAN

SUBMISSION BY THE ROYAL AUSTRALIAN PLANNING INSTITUTE – ACT DIVISION - TO JOINT STANDING COMMITTEE ON THE NATIONAL CAPITAL AND EXTERNAL TERRITORIES

BACKGROUND

1. This is a submission by the Royal Australian Planning Institute (RAPI), ACT Division.
2. The Institute promotes excellence in planning and is the national professional organisation representing qualified planners in Australia. The ACT Division comprises more than 90 members.

THE DRAFT AMENDMENT

3. It is understood that the Draft Amendment No 39, if approved, will apply to all areas identified by Figure 7 of the National Capital Plan as "Residential".
4. The Draft Amendment contains specific Principles and Policies which apply to the residential areas of Deakin and Forrest that lie between State Circle and National Circuit, with other specific Principles and Policies which apply only to residential sites fronting State Circle between Hobart Avenue and Adelaide Avenue.
5. The Draft Amendment, with respect to residential land within the area incorporates the following main principles:
 - retain residential character
 - 2 storey (8 metre) height limit

With regard to land fronting State Circle additional controls are proposed, i.e.:

- mandatory 2 storey form
- plot ratio single sites 0.4
- plot ratio amalgamated sites 0.6
- 10 metre landscaped front set back
- courtyard walls allowed on State Circle subject to 6 metre set back

LOCATIONAL CONSIDERATIONS

6. State Circle was prominent on Griffin's Plans as part of a system of concentric roads circling Capital Hill, which in descending order comprise Capital Circle, State Circle, National Circuit, Dominion Circuit, and Empire Circuit. Only Capital Circle and State Circle have been built in their entirety.
7. State Circle is a corridor of immense national capital significance, as is the land fronting it. The inside of State Circle contains Parliament House and its associated landscaping. A range of different land uses and development forms front the outer edge of State Circle.
8. State Circle is also important in that it connects the radiating National Avenues, i.e. Commonwealth Avenue, Kings Avenue, Brisbane Avenue, Sydney Avenue, Canberra Avenue, Hobart Avenue, Melbourne Avenue, Adelaide Avenue, and Perth Avenue.
9. Consequently State Circle has significant symbolic and functional importance in the structure of the Central National Area, an importance which needs to be reflected in the type, character and quality of development which addresses it.

PLANNING RESPONSIBILITY

10. The previous Draft Amendment (November 2000) proposed that the status of the land as a Designated Area of the National Capital Plan be removed. Although the land would have remained subject to the Special Requirements of the Plan, the result would have seen planning responsibility transfer to the Territory.
11. The current Draft Amendment before the Committee proposes that the land remain a Designated Area, meaning that full planning responsibility stays with the Commonwealth (National Capital Authority).
12. RAPI strongly supports the intention to retain the designated status of the land. Under Clause 10(1) of the *(ACT (Planning and Land Management) Act 1988* the National Capital Plan "*may specify areas of land that have the special characteristics of the National Capital to be Designated Areas*".
13. We believe that the land in question has the special characteristics of the National Capital. The role and form of State Circle can be traced back to Griffin, and has been re-inforced by successive planning administrations since.

14. RAPI endorses the intention of the Draft Amendment to protect the integrity of a homogeneous precinct by ensuring that a consistent set of planning controls apply. For this reason National Circuit represents an appropriate outer boundary for the Designated Area, particularly as it also represents the Designated Area boundary in the contiguous areas of Forrest and Barton.

EXISTING POLICY

15. The current policy in the National Capital Plan is derived from Figure 7, and a number of Appendices including H (Design and Siting Conditions), M (Residential Land Use), and P (Dual Occupancy of Detached House Blocks). The effect of these provisions will generally lead to low density detached housing or dual occupancy developments, with some level of integrated home business use. In our view this is not an appropriate form of development for such a significant site, as can be evidenced by the one dual occupancy development already constructed. We support the Authority's proposal to Amend the Plan in respect of the policies and controls that apply to this land. However the detailed provisions of the draft Amendment, in our view, fall short of an appropriate urban design response to this very important land.
16. The proposed Principles and Policies which apply to sites fronting State Circle, fail to capture the opportunity for a prominent and distinctive interface between Parliament House and its encircling development. The proposals are more typical of the policies which would apply to development that interfaces with a suburban shopping centre, rather than one that interfaces with the most important building and democratic institution in the nation.
17. The Authority has previously recognised the importance of the State Circle interface in establishing the York Park Master Plan (Appendix T2 of the Plan), and its approval of the DFAT building. Although the York Park precinct is intended for office developments, the principles that have driven the detailed conditions of urban design and urban form at Appendix T2, have similar relevance to the subject land and its context.
18. The need to provide reasonable protection of residential amenity to existing residents needs to be balanced with an objective that the quality and presentation of development on prime land fronting State Circle is consistent with its broad scale, important role and direct interface with Parliament House.
19. The Commonwealth Government led the way in the 1990s by demonstrating, through the development of the Australian Model Code for

Residential Development, how more intensive urban development could produce high quality design and high levels of urban amenity.

20. The ACT Government's Urban Housing Code (Appendix 111.3 of the Territory Plan) is based on the principles of AMCORD and allows more intensive urban development at selected locations. Allowable residential densities are higher than in other suburban situations and height limit is controlled by performance based criteria. Such a Code could form a reference for the review of the proposed Principles and Policies in this Amendment. In our view, a two storey height limit, as proposed by the draft Amendment, is unlikely to produce the desired urban design outcome.
21. The NCA have previously supported multi-unit developments fronting major National Avenues e.g. Canberra Avenue and Brisbane Avenue. For example "The National" residential development currently being constructed on a site fronting Brisbane Avenue, has an approved plot ratio of 1.37 to 1. We believe that this is a more appropriate residential housing form for the residential land fronting State Circle, being capable of providing a massing of buildings which will reinforce the geometry of State Circle, and provide a more cohesive visual relationship with other non residential and symbolically significant buildings nearby.
22. Currently Parliament House appears remote from the city that surrounds it. This is a result of a number of factors including the perceived physical barriers created by two heavily trafficked roads (Capital Circle and to a lesser extent, State Circle), the ever maturing landscape which is obstructing some of the visual connections, and the low density and openness of the development encircling it. In a report published by the National Capital Development Commission in 1974 on the siting, planning and design of the new Parliament House, it is stated:

If a Parliament House is built on Capital Hill then measures will need to be taken to relate the building closely to the surroundings. This can be done by careful choice of the land uses which are planned in the areas adjacent to Capital Hill and to the improvement of access to the site. The western segment leased by embassies and much of the southern area leased privately cannot readily be considered for uses directly associated with Parliament. Nevertheless, there are likely to be many opportunities for integration in the longer term.

The opportunity for "integration" is now available through the current draft Amendment, in a more effective way than currently proposed.

23. A more imaginative response to potential redevelopment of State Circle frontages will assist in breaking down perception of the remoteness (from the rest of the City) of Parliament House.

CONCLUSIONS

24. The proposed Amendment should be visionary and innovative in its pursuit of an urban design outcome which is best for the National Capital.
25. A set of conditions could be formulated which more adequately reconciles national capital interests with residents interest; conditions that promote a more appropriate and imaginative response to the Parliament House interface than could be achieved under the currently proposed draft Amendment. We believe that a more intensive and comprehensive development approach can be achieved in a manner which will not unduly affect the amenity of adjoining residential property.

Claire Middleton

Claire Middleton
President, ACT Division
Royal Australian Planning Institute
(To be known as the Planning Institute of Australia from 1 July 2002)