



National Capital and External Territories Joint Standing Committee

**Submission for the Inquiry into
the future role of the National Capital Authority**

April 2008

The *Voice* of Leadership

LEVEL 1 1 Hobart Place AMP Tower Canberra City ACT 2600 - GPO BOX 1025 Canberra ACT 2601

PH 02 6248 6902 - FAX 02 6248 8210

Email act@propertyoz.com.au - www.propertyoz.com.au





Contents

Executive summary	2
1. Introduction	4
2. The Commonwealth interest in the National Capital	5
2.1 The Commonwealth's role in Canberra	5
2.2 Dual interest	5
2.3 Duplication	6
2.4 Structure Planning	6
3. Governance	9
3.1 Legislative background	
3.2 The planning instruments	11
3.3 Development approval process	11
3.4 The Development Assessment Forum (DAF) model	12
3.5 Consultation and third party appeal rights	12
3.6 Reporting arrangements	13
3.7 Title	
4. Promotion of the National Capital	14

Appendices

- A Infrastructure case



Executive summary

Summary

The Commonwealth Government needs to play an ongoing role in strategic planning for Canberra, as well as continuing its investment in promoting and marketing of Canberra as the nation's capital, through a properly resourced and funded National Capital Authority (NCA).

This submission argues strongly against the continuous erosion of the roles, responsibilities and funding of the NCA. The Property Council of Australia promotes a properly funded and supported NCA.

Recommendations

The Property Council of Australia makes the following recommendations:

Recommendation 1 – The Commonwealth Government retain a strong focus on the nation's capital through a properly funded and resourced National Capital Authority.

Recommendation 2 - The legitimacy of dual interest (Commonwealth and ACT Government) be recognised and appropriately managed.

Recommendation 3 – A formal framework be devised to enable co-operation between the Commonwealth, Territory and other regional stakeholders.

Recommendation 4 – The Commonwealth, through the NCA, lead and facilitate the agreement of protocols for engagement with the ACT Government and regional governments in developing Commonwealth planning policy for the Territory.

Recommendation 5 – That the co-operative framework not be limited to planning issues but expanded to other dual interest issues such as land release and infrastructure projects.

Recommendation 6 - That the roles and responsibilities be explicitly clarified between the Commonwealth statutory authority and the ACT planning body.

Recommendation 7 - The NCA be the vehicle through which the ACT's land-use, spatial and demographic distribution planning is articulated.

Recommendation 8 - The NCA maintain a strong urban planning and urban design capability and that the NCA Board oversight this important role.

Recommendation 9 – That the NCA set the planning framework for all areas of national significance including the National Capital Open Space System (NCOSS), boulevards, arterial roads, corridors, avenues including Northbourne Ave; Civic and Town Centres; National Capital Area incorporating the National Triangle and Parliamentary Zone and its greater axes; places of significant public and national significance, including City Hill; diplomatic zones; and hills, rivers and buffers.

Recommendation 10 – That the NCA retain an appropriate level of involvement in all projects of national significance within the Central National Area.

Recommendation 11 – The legislative framework remain unchanged.

Recommendation 12 - That the National Capital Plan be the primary and overriding planning instrument in the ACT.



Recommendation 13 - That the National Capital Plan refer to a new strategic planning instrument – a strategic plan (titled, for example, The Strategic Metropolitan Plan or the like).

Recommendation 14 – That the legislation provide for a mandatory 5-yearly review of the strategic document.

Recommendation 15 - That the Territory Plan remain subordinate to the National Capital Plan and at no time be inconsistent with the primary plan (the NCP).

Recommendation 16 - The Property Council supports a single planning document for Canberra with two statutory components.

Recommendation 17 - That the current NCA development assessment (*Works Approval*) process be retained.

Recommendation 18 - That development consistent with established policy should not be referred for consultation and should not be appealable. This is consistent with the Development Assessment Forum (DAF) model.

Recommendation 19 - That the National Capital Authority report directly to the Prime Minister.

Recommendation 20 - That the Board be represented by the following: A Chairperson and Chief Executive Officer and board members with technical capabilities (architects, landscape architects and planners, as nominated by their respective peak bodies); delegates nominated by the Commonwealth Minister, and an ACT delegate of the Chief Minister.

Recommendation 21 - That the title 'National Capital Authority' be retained.

Recommendation 22 – That the NCA's charter include the effective national promotion of the National Capital including responsibility for events coordination and the development of the distinctive character of Canberra.

Recommendation 23 – That the NCA maintain management of estates and Commonwealth infrastructure including but not limited to Lake Burley Griffin and its foreshores, national monuments, Anzac Parade and Old Parliament House Rose Gardens.

Property Council Concerns

To be clear, the Property Council and its members would be very concerned if:

- ▶ The role of the NCA was reduced to merely being a referral authority;
- ▶ Responsibility for the preparation of development control plans for designated Commonwealth controlled land was transferred to the Territory government;
- ▶ The NCA's purview is diminished to the National Triangle or Parliamentary Zone because the National Capital *is* the entire Territory.



1. Introduction

In this submission to the Commonwealth Parliament's Inquiry into the future role of the National Capital Authority (NCA) and the way in which the Commonwealth will protect its interests in the national capital, the Property Council has drawn upon a decade's worth of advocacy, which includes years of proactive and constructive feedback on the role of the NCA, including a submission and hearing appearance at the 2004 inquiry.

We have equally been proactive in developing this submission, drawing on the experience of our members to review the interest, roles and responsibilities of the Commonwealth as they relate to the Australian Capital Territory and subsequently reiterate that we support an independent Commonwealth organisation that oversees the interests of the Commonwealth in Canberra and its environs.

Who we are

The Property Council of Australia represents the interests of the multi-billion dollar property investment industry, which helps shape, build and finance our cities.

Nationally our members include the bulk of the nation's investors in office buildings, shopping centres, industrial buildings, tourism, accommodation and infrastructure. Our members are also major developers of commercial and residential property.

More than nine million Australians have a direct stake in our industry through their superannuation, life insurance and managed funds. Together we have a long-term interest in the future of our urban and regional centres, and in the future of the nation's capital, and our home, Canberra.



2. The Commonwealth interest in the National Capital

The Property Council of Australia notes with interest that this inquiry is the fourth of its kind into the role and function of the National Capital Authority. Each time the role of the NCA has survived – an outcome we believe should be sustained.

2.1 The Commonwealth's role in Canberra

The Commonwealth Government's ongoing role in the strategic planning for the ACT, as well as its oversight of the national capital aspects of the city's development and promotion, is critically important for the future of Canberra. The Property Council would strongly advocate that responsibility for overall the strategic planning of Canberra should not be diminished through the transferral of responsibilities to other Commonwealth or local agencies. In our view, recent funding cuts to the NCA will not assist in the resolution of critical issues, but instead make it more difficult for the Commonwealth to engage in a meaningful way on issues of importance including, for example, issues such as the optimum location of employment centres in Canberra and a comprehensive review of the National Capital Plan.

The Property Council is dismayed by measures aimed at cutting back on Government spending on the national capital, including a reduction in funding to the National Capital Authority of \$11.5 million over four years, without first conducting a review of what these funding cuts will mean, and what impact funding cuts will have on the planning and administration of the national capital from a Commonwealth perspective.

Recommendation 1 – The Commonwealth Government retain a strong focus on the nation's capital through a properly funded and resourced National Capital Authority.

2.2 Dual interest

Single interest or administration of Canberra, whether by the Commonwealth or ACT Governments, is unrealistic and inappropriate.

While both the Commonwealth and ACT Governments have strong roles and responsibilities in the planning system, industry has serious concerns about the capacity of the ACT Government to take up the lost planning responsibilities of the NCA given they are currently unable to fulfil their existing statutory functions, such as development assessment, due to resource constraints and the dispersal of planning functions across multiple government agencies.

Recommendation 2 - The legitimacy of dual interest (Commonwealth and ACT Government) be recognised and appropriately managed.

2.2.1 A framework for co-operation

A formal framework is required to enable co-operation between the Commonwealth, Territory and other regional stakeholders. Despite best intentions of political bi-partisan co operation, the Property Council believes it is unrealistic to achieve perfect harmony between Commonwealth and Territory interests in the national capital, given the different interests and focus of their respective constituencies. In the best interests of the 21 million Australians who have a direct stake in our national capital and the members of



federal parliament that are entrusted with it, a system must be developed that ensures the highest quality capital territory in which all Australians can have a sense of pride, a spirit of ownership and a wish to visit frequently.

Furthermore, while co-operation has been attempted in planning issues (i.e. between NCA and ACTPLA), the political landscape is more complex and requires co-operation and coordination on many issues including land release (i.e. between DOFA and ACT Treasury).

Recommendation 3 – A formal framework be devised to enable co-operation between the Commonwealth, Territory and other regional stakeholders.

Recommendation 4 – The Commonwealth, through the NCA, lead and facilitate the agreement of protocols for engagement with the ACT Government and regional governments in developing Commonwealth planning policy for the Territory.

Recommendation 5 – That the co-operative framework not be limited to planning issues but expanded to other dual interest issues such as land release and infrastructure projects.

2.3 Duplication

The Property Council agrees that, where practical, duplication should be reduced. However, it is important to recognise that some relevant areas of duplication will need to be retained to maintain the integrity of the national capital. Another reason for necessary duplication in some areas is the Commonwealth's ability to fund or assist in funding important projects in the national interest such as roads infrastructure.

Through the National Capital Plan and the Territory Plan, the Commonwealth and Territory governments share planning responsibility for certain areas. As the Gungahlin Drive extension showed, where the views of the two governments differ, planning decisions become uncertain, resulting in delays and additional costs. This is a significant impediment to growth and development across the region.

In principle the Property Council supports reforms that enable the NCA and those ACT Government agencies involved in planning matters to work together more effectively at all levels from strategic planning to individual projects in which both levels of government have a legitimate interest, as is the case when the NCA works with other Commonwealth agencies with responsibilities for Commonwealth land (such as Finance or Defence).

Recommendation 6 - That the roles and responsibilities be explicitly clarified between the Commonwealth statutory authority and the ACT planning body.

2.4 Structure Planning

Strategic planning of the Australian Capital Territory is critical to the future viability and strong growth of the nation's capital, which doubles as a significant regional centre. The NCA must play a lead role to protect the overall metropolitan structure and its impact on the Central National Area (CNA). That is, the Property Council believes that the NCA should monitor ACTPLA strategic planning to ensure the metropolitan structure plan is maintained. For example, it is important to ensure that the proposed development at Molonglo does not detrimentally impact on the traffic, circulation and visual setting of the Central National Area and the greater metropolitan infrastructure such as Majura Parkway.



The National Capital Authority, in consultation with the Territory Government, is the best vehicle by which to plan and implement:

- ▶ Land use planning including areas appropriate for settlement and non-settlement incorporating the National Capital Open Space System (NCOSS);
- ▶ Spatial planning at a metropolitan scale;
- ▶ Critical infrastructure planning;
- ▶ Public transport alignments and networks;
- ▶ Demographic planning including population distribution and workforce planning; for
 - all aspects of the national capital in the form of a plan for the whole Territory setting the future vision and providing a planning framework for the following areas of the Territory:
- ▶ Boulevards, corridors and avenues including Northbourne Ave;
- ▶ Town Centres and surrounds, including Civic;
- ▶ National Capital Area incorporating the National Triangle and Parliamentary Zone and its greater axes;
- ▶ Places of significant public and national significance, including City Hill.

Recommendation 7 - The NCA be the vehicle through which the ACT's land-use, spatial and demographic distribution planning is articulated.

2.4.1 Critical infrastructure

The NCA should play a strategic role in the articulation, prioritisation and organisation of critical infrastructure to the National Capital and immediate region. Transport to and from Canberra and inter-town centre transit corridors remain integral to the metropolitan structure of the Territory. It follows that the NCA should also argue the corresponding basis for major infrastructure investment in the Territory and environs.

A case in point is the Constitution Avenue and Kings Avenue/Parkes Way grade separation project, which the Property Council supports in its entirety. Refer Appendix A.

2.4.2 Quality of urban planning and design

The Property Council advocates the highest level of oversight required to achieve the highest standards in design for areas of national significance.

From an industry point of view there is considerable confidence in the quality of work done by the NCA, including its maintenance and administration of a contemporary overarching planning instrument for the ACT – the National Capital Plan. The associated development approval processes are administered by skilled professionals of equal standing to the professional consultants acting on applicants' behalf through consultative and respectful peer-based relationships that result in efficient approvals.



Recommendation 8 - The NCA maintain a strong urban planning and urban design capability and that the NCA Board oversight this important role.

2.4.3 Areas of National Significance

Recommendation 9 – That the NCA set the planning framework for all areas of national significance including the National Capital Open Space System (NCOSS), boulevards, arterial roads, corridors, avenues including Northbourne Ave; Civic and Town Centres; National Capital Area incorporating the National Triangle and Parliamentary Zone and its greater axes; places of significant public and national significance, including City Hill; diplomatic zones; and hills, rivers and buffers.

2.4.4 Individual projects

The National Capital Authority has been involved in individual projects of national significance with involvement ranging from: development assessment; to procurement; to project management; to in-house design and superintendence. This flexible arrangement allows the NCA to be appropriately engaged in ensuring high quality outcomes for the national capital.

Recommendation 10 – That the NCA retain an appropriate level of involvement in all projects of national significance within the Central National Area.



3. Governance

3.1 The legislative background

The national capital is unique in that it has Commonwealth and municipal components.

“The *Seat of Government (Administration) Act 1925* established the Federal Capital Commission to develop and administer the (now) ACT which was replaced after a gap with the National Capital Development Commission in 1957 to plan, develop and construct Canberra. The *Australian Capital Territory (Self Government) Act 1988* transferred a range of powers from the national government to the newly formed local government. The *Australian Capital Territory (Planning and Land Management) Act 1988* created a national agency, the National Capital Planning Authority (now the National Capital Authority) with responsibility for planning and development related to Canberra’s role as the National Capital.

The Australian Parliament established the ACT as a body politic with limited self-government under the *Australian Capital Territory (Self-Government) Act 1988*. The legislation provided for an elected Legislative Assembly with an Executive responsible for governing the Territory (the ACT Government). Introduction of self-government for the ACT created a situation where the Commonwealth Government and ACT Government would share responsibility for the further planning and development of the Territory.

The Commonwealth Government is responsible for Canberra’s role and functioning as the National Capital and (subject to that Self-Government Act) the ACT Government assumes responsibility for those affairs comparable to the other Australian states and for local government services.

The NCA is established under the Australian Capital Territory (*Planning and Land Management) Act 1988 (the Act)*. Part II of the Act establishes the Authority, prescribes its powers and functions and makes it subject to general ministerial direction.

The statutory functions of the NCA comprehensively establish the extent of the Commonwealth’s interest in the National Capital.”¹

Recommendation 11 – The legislative framework remain unchanged.

3.2 The planning instruments

National Capital Plan

The Property Council believes that the National Capital Plan should be retained as the principle plan for Canberra, including its setting of the tone and objectives for Canberra as the nation’s capital for the major approach routes, hills, ridges and buffer zones, waterways, metropolitan structure and the settlement pattern of the ACT.

In cases of disputes between its requirements and other planning instruments, the National Capital Plan should have primacy.

¹ The Capitals Alliance, *Governance Snapshot: Draft V8*



Recommendation 12 - That the National Capital Plan be the primary and overriding planning instrument in the ACT.

A vision for the Australian Capital Territory

This submission proposes that the NCA prepares as part of its ongoing work on the National Capital Plan, a separate stand alone strategic document, i.e. the 'National Capital Strategic Plan 2010 to 2020', which will be reviewed and re-issued every 5 years to allow revision and alignment for the next decade. This would override the current General Policy Plan – Metropolitan Canberra – Fig 1 of the National Capital Plan.

Preparation of this document should be undertaken through a broad local community and stakeholder consultation as well as with national and international input on key issues. It requires funding for research and preparation. This strategic plan is to be based on the main objectives and areas of activity outlined in the National Capital Plan, yet it also provides clear strategic aims and directions and a basis for the longer-term development of the Nation's Capital. It thereby becomes a guide that assists and informs investment and development decisions of industries, communities and stakeholders in the ACT and beyond.

The NCA if authorised, staffed and funded accordingly, is well placed to prepare and present such a longer-term vision and perspective for the National Capital through such a strategic document. This strategic plan should research and articulate infrastructure as well as aspirations and community values as well as physical outcomes to facilitate further discussion, planning, funding and subsequently delivery in the projected timeframe.

Strategic topics to be addressed could include but not be limited to:

- ▶ Sustainability and growth as local city and national capital
- ▶ Management of transport, social and civil services infrastructure
- ▶ Community, culture and industry based emphasis for the next decade
- ▶ Strategic planning and development criteria with a focus for the next decade

Recommendation 13 - That the National Capital Plan refer to a new strategic planning instrument – a strategic plan (titled, for example, The Strategic Metropolitan Plan or the like).

Recommendation 14 – That the legislation provide for a mandatory 5-yearly review of the strategic document.

Administrative arrangements

Oversight and administration of the National Capital Plan should be by an expert organisation, with a clear charter so it is accountable for meeting the objectives set and with a separate and transparent funding mechanism. Clearly the NCA can offer all this, with amendment and further resolution of the objectives in its Statement of Intent.



The Territory Plan

Recommendation 15 - That the Territory Plan remain subordinate to the National Capital Plan and at no time be inconsistent with the primary plan (the NCP).

A single document

As the National Capital Plan is amended through Federal Parliament and the Territory Plan through the Legislative Assembly it is essential that both plans clearly cross-reference one another and that both plans are consistent in presentation and format.

Recommendation 16 - The Property Council supports a single planning document for Canberra with two statutory components.

3.3 Development approval process

The Property Council advocates that the role and responsibility of the NCA be enhanced and strengthened in regards to the development and approval process for projects related to specific objectives or areas of significance outlined in the National Capital Plan (NCP), as well as those that have a direct impact on the vision and strategic direction prepared by the NCA for the national capital. The local planning framework managed by ACTPLA sits under and within the National Capital Plan. Currently the natural overlap of authority to facilitate approval of proposed developments bordering on Commonwealth land or NCA designated areas, often results in a tug-of-war on the individual issues (ie, height, envelope, etc) rather than clear line of authority, that after ACTPLA pre-assessment NCA comment, amendment or final approval are sought. The NCA in this role also needs to have the ability to seek private sector input and partnership if this facilitates the achievement of specific objectives (on project or strategic basis) within the approved operating framework either on financial or triple bottom line basis.

The Property Council supports the NCA to receive re-affirmed decision making authority in relation to proposed improvement and development in Civic, the national triangle, avenues or hills and buffers and other aspects of the NCP. This authority needs to be defined and reflected in the development and approval processes of ACTPLA and the NCA to improve clarity and accountability for the range or industry sectors and community investing, living and building the Canberra as the national capital of Australia.

3.3.1 Dual interest development assessment

Property Council members have experienced very successful examples of ACT Government approvals where the NCA has been consulted. Similarly, our members have experienced positive results where the NCA was the approving authority and liaison and referral was required to various ACT Government bodies such as Roads ACT.

3.4 The Development Assessment Forum (DAF) model

Until the recent budget cuts, development proponents experienced a simple, fast and certain development assessment and approval process due to the robust policy position of the National Capital Plan, quality urban design, planning, architectural and landscape architectural experience and expertise



of the NCA. The development approvals process (termed Works Approval) is in line with the Development Assessment Forum (DAF) model.

Recommendation 17 - That the current NCA development assessment (Works Approval) process be retained.

3.5 Consultation and third party appeal rights

The Property Council supports the underlying principle that the NCA conduct public consultation on the preparation of planning policies, consistent with the principles of the DAF model. However, we note that consultation would need to address both national and local constituencies. We would not support public consultation on projects of national significance within the Parliamentary Zone due to difficulty of achieving meaningful national consultation and believe that the judgement of the professionals appointed by the Government should be the sole basis for determining the projects with the opportunity to set up peer reviews of developments similar to that recently undertaken on the National Gallery of Australia if required by circumstance.

Recommendation 18 - That development consistent with established policy should not be referred for consultation and should not be appealable. This is consistent with the Development Assessment Forum (DAF) model.

3.6 Reporting arrangements

The Property Council notes with interest the reporting arrangements of capital cities Ottawa and Washington as follows:

- ▶ In Canada, the NCA equivalent, the NCC, is responsible to Parliament for guiding the development of federal lands in the Capital over the long term.
- ▶ In the United States, Washington's NCPC is a statutory body with twelve designated members. The U.S. President appoints the Chairman of the Commission, who is the head of the agency, as well as two other members. NCPC is an executive branch agency, and the Chairman reports directly to the President.

Regardless of the differing political philosophies, both of these examples raise the capital authority to a reporting level befitting a national capital.

3.6.1 Ministerial reporting

Given the importance of Canberra as the national capital, and consistent with the importance placed on other planned national capitals such as Washington and Ottawa, the Property Council believes that the National Capital Authority should report directly to the Prime Minister.



Recommendation 19 - That the National Capital Authority report directly to the Prime Minister.

3.6.2 The board

Representation

The Capital's national significance should draw national interest and expertise. Therefore the board should be represented accordingly.

Recommendation 20 - That the Board be represented by the following: A Chairperson and Chief Executive Officer and board members with technical capabilities (architects, landscape architects and planners, as nominated by their respective peak bodies); delegates nominated by the Commonwealth Minister, and an ACT delegate of the Chief Minister.

3.7 Title

The name of the statutory body is important as it will convey the interest of the body. As a statutory body, the word 'Authority' is appropriate. 'National' and 'Capital' also directly convey the purview of the organisation and are therefore also appropriate.

Recommendation 21 - That the title 'National Capital Authority' be retained.



4. Promotion of the National Capital

The NCA should retain the effective national promotion of the national capital including responsibility for events coordination and the development of the distinctive character of the national capital. National promotion of the national capital is not the role of the ACT Government. In the national interest we encourage the ACT Government to support the Commonwealth's vital role in this promotion of pride in the national capital.

Recommendation 22 – That the NCA's charter include the effective national promotion of the National Capital including responsibility for events coordination and the development of the distinctive character of Canberra.

Recommendation 23 – That the NCA maintain management of estates and Commonwealth infrastructure including but not limited to Lake Burley Griffin and its foreshores, national monuments, Anzac Parade and Old Parliament House Rose Gardens.

For further information contact:

Catherine Carter
Executive Director
Property Council of Australia (ACT)
GPO Box 1025
Canberra ACT 2601

T: 02 6248 6902
E: act@propertyoz.com.au



Appendix A
Infrastructure case

Letter supporting Kings Avenue Flyover, Canberra



17 March 2008

Ms Annabelle Pegrum
Chief Executive
National Capital Authority
Treasury Building
Newlands Street
Parkes ACT 2600

Dear Ms Pegrum

Kings Avenue Flyover, Canberra

I understand that the Public Works Committee, in the course of its inquiries into major public works projects, will be conducting an inquiry into the proposed lowering of Parkes Way under Kings Avenue.

The Property Council supports the correction of a long-standing infrastructure bottleneck and safety hazard at the Russell Hill roundabout: a problem which can be remedied, in part, by the lowering of Parkes Way so that it goes under Kings Avenue. The Property Council recognises the economic and social value that improvements such as the grade separation of Parkes Way and Kings Avenue can add, including increased productivity and quality of life. Put simply, the less time spent in traffic, the more time Canberra residents and visitors to Canberra will be able to spend with family, visiting our cultural institutions, and at work – including at Russell Hill and the Parliamentary Zone.

The Russell Hill roundabout is of course not an isolated bottleneck, but represents one of the hinge-points within an inextricably connected network of roads, bicycle paths and pedestrian routes that extend up to Parliament House, around Russell Hill, along Parkes Way to the Canberra International Airport, up Constitution Avenue, Anzac Parade and beyond to Canberra's satellite town centres, and interstate.

The Property Council is disappointed with the decision to remove funding for the Constitution Avenue element of the overall project, particularly given the Federal Government's stated commitment to identifying and building world class infrastructure projects of national importance. In our view the proposed Constitution Avenue upgrade project is necessary and should be reinstated. Significant development is already going ahead on Constitution Avenue including a major high security facility for Defence and refurbishment projects at Anzac Park

The Voice of Leadership

LEVEL 1 1 Hobart Place AMP Tower Canberra City ACT 2600 - GPO BOX 1025 Canberra ACT 2601

PH 02 6248 6902 - FAX 02 6248 8210

Email act@propertyoz.com.au - www.propertyoz.com.au


**PROPERTY
COUNCIL**
of Australia



East and West. Significant additional development has also been mooted on a number of sites along Constitution Avenue, including a possible major office project for Russell itself.

This additional development when completed will put enormous pressure on existing infrastructure, particularly the existing roadway. The loss of the project will also strip amenity from the precinct, as cafes, restaurants, shops and ATMs are now to large extent precluded from opening their doors, which would have allowed workers to efficiently run errands before and after work and during lunch breaks, and provide an alternative destination to Civic.

We look forward to the upgrade of the Kings Avenue and Parkes Way intersection, but also request that government reconsider the rescinding of funding for the more holistic Constitution Avenue upgrade project, so that Canberra can avoid the social and productivity losses that traffic gridlock will inevitably cause in only a handful of years.

The Property Council asks that this statement of support accompany the National Capital Authority's submission to the Public Works Committee.

Yours sincerely

Catherine Carter
Executive Director
Property Council of Australia (ACT)

The *Voice* of Leadership

LEVEL 1 1 Hobart Place AMP Tower Canberra City ACT 2600 - GPO BOX 1025 Canberra ACT 2601
PH 02 6248 6902 - FAX 02 6248 8210
Email act@propertyoz.com.au - www.propertyoz.com.au

**PROPERTY
COUNCIL**
of Australia