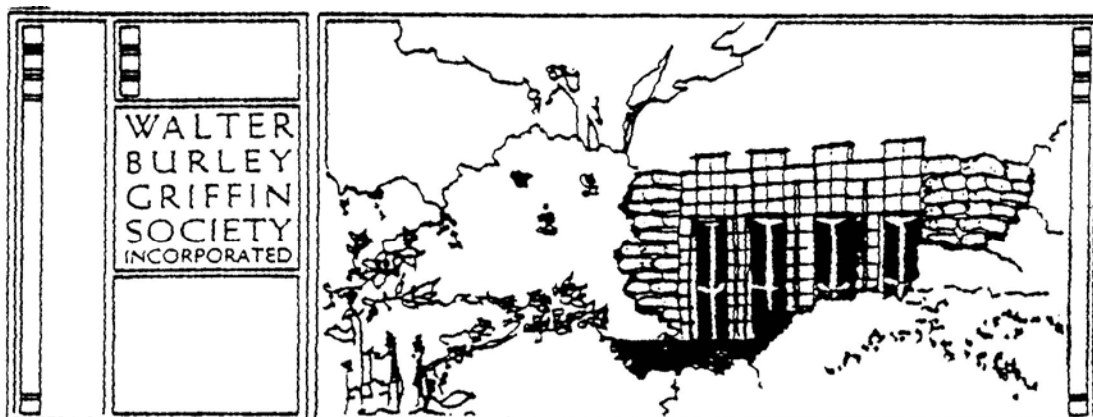


SUBMISSION NO.1



STATEMENT
FOR MEMBERS OF THE PARLIAMENTARY JOINT STANDING COMMITTEE
ON THE NATIONAL CAPITAL & EXTERNAL TERRITORIES

Roundtable Public Hearing
Griffin Legacy Amendments 56, 59, 60 and 61 to the National Capital Plan

Parliament House, Canberra
23 February 2007

Prepared by Professor James Weirick
President, Walter Burley Griffin Society Inc.
140 Edinburgh Road
Castlecrag, NSW 2068

22 February 2007

TABLE OF CONTENTS

1.0 The Scale and Significance of the Griffin Legacy Amendments	3
2.0 Amendment 56: The Griffin Legacy – Principles and Policies	4
Conclusions	8
3.0 Amendment 59: City Hill Precinct	10
Conclusions	16
4.0 Amendment 60: Constitution Avenue	17
Conclusions	21
5.0 Amendment 61: West Basin	22
Conclusions	30
6.0 The Public Consultation Process	31
Conclusions	33
7.0 Conclusions	34
8.0 Illustrations	35
Appendix 1: Statement of Authorship	43
Appendix 2: The Walter Burley Griffin Society Inc.	44

This Statement was prepared by Professor James Weirick, President of the Walter Burley Griffin Society Inc. on behalf of the Management Committee and the Committee of the Canberra Chapter, Walter Burley Griffin Society Inc., Chairman: Brett Odgers.

1.0 The Scale and Significance of the Griffin Legacy Amendments

- 1.1 The Walter Burley Griffin Society Inc thanks the Joint Standing Committee on the National Capital & External Territories for the opportunity to participate in the Roundtable Public Hearing on the Griffin Legacy Amendments to the National Capital Plan.
- 1.2 This Roundtable is the most significant Parliamentary meeting to discuss the future of Australia's National Capital since the 1954 Senate Select Committee on the Development of Canberra – the McCallum Committee – whose findings led to the creation of the National Capital Development Commission and construction of the city we know today.
- 1.3 The 'Griffin Legacy' Amendments to the National Capital Plan, prepared by the National Capital Authority, propose the most significant, far-reaching and irreversible changes to Central Canberra since the creation of Lake Burley Griffin and associated works by the NCDC in the early 1960s.
- 1.4 The proposals call for extensive real estate development on the public lands of Central Canberra – a multi-billion dollar proposal to sell the development rights of a significant section of the symbolic centre of the National Capital.
- 1.5 To date, the development of Canberra has lacked an 'urban' quality in terms of the vitality, diversity, intensity of everyday life; the integration of public activities and public institutions; and the creation of high density urban districts. The Griffin Legacy proposals seek to overcome the 'suburban' character of Canberra by building new, street-defining urban precincts in the centre of the city and around the lake shore. This has been attempted in the past – for example, on Northbourne Avenue and Barry Drive. The results do not inspire confidence. Nor do the built works at Kingston Foreshore.
- 1.6 Subdivision of the immensely valuable public lands at the centre of the city and the sale of their land use rights is a huge, irreversible step in the history of the National Capital and the history of Australia.
- 1.7 From any analysis of the documentation, it is clear that the NCA proposals are based on an unacceptable, cavalier approach to the principles of city planning, city building and community consultation.
- 1.8 The Walter Burley Griffin Society is concerned that Griffin's name has been used to advance an utterly mediocre outcome that will compromise Canberra forever.

2.0 Amendment 56: The Griffin Legacy – Principles and Policies

- 2.1 Amendment 56 to the National Capital Plan begins with the statement, ‘*The Griffin Legacy* is a blueprint for Canberra and the Territory. *The Griffin Legacy* directs future public and private investment in core areas of the capital where opportunities are created for vibrant, mixed use precincts alongside cultural institutions, government buildings and major natural attractions. It restores the intended urbanity and vitality of Canberra as a cosmopolitan city.’
- 2.2 *The Griffin Legacy* is no such thing.
- 2.3 *The Griffin Legacy* is a 2004 NCA publication, which undertakes historical analysis of Griffin’s plan and advances a series of propositions and strategic initiatives that claim to extend the relevance of Griffin’s ideas. It is not a blueprint, it is a series of ‘City Beautiful’ artist’s impressions, unsupported by any planning data.
- 2.4 Between completion of the 2004 *Griffin Legacy* historical analysis and preparation of the Griffin Legacy Amendments to the National Capital Plan in 2006, the NCA failed to undertake an essential intermediate step – the preparation of a ‘Griffin Legacy Implementation Plan’ to address the following:
- the environmental impact of the proposals with reference to the water quantity and quality of Lake Burley Griffin, the loss of the established tree cover and grassed landscapes of Central Canberra, air quality, energy use etc;
 - the heritage impact of the proposals;
 - the visual impact of the proposals with respect to major views and vistas in Canberra, relationship with Parliament House and national institutions, the loss of substantial components of the existing tree canopy etc;
 - the traffic and transport implications of major changes to the motorways, distributor roads and CBD intersections throughout Central Canberra from the airport approach at Pialligo to the Tuggeranong Freeway at Acton; and the increase in density along major urban arterials;
 - the land use reality of the scheme, i.e. the type and area of land uses within the new subdivided estate;
 - the demographic implications of the proposal, i.e. the number of new residents and new jobs proposed for Central Canberra;
 - the implications of this new concentration of people and employment in Central Canberra on the rest of Canberra in terms of economic development, property values, employment distribution, retail activity, community facilities, public transport etc.
 - the pattern and extent of Federal land and Territory land within the scheme, and the effect of this pattern on land release, phasing, timing, infrastructure provision etc.

- the market viability of the proposals, in terms of population growth in Canberra, the demographic profile of the Canberra community and existing patterns of commercial and residential investment throughout the Canberra-Queanbeyan region;
 - the cost and funding of the proposals;
 - the scale and timing of public sector investment;
 - the implications in terms of community life and community development of a substantial urban population on National Land with respect to conflicts with National Capital functions, a demonstrated lack of transparency and community consultation capacities on the part of the NCA, and no right of planning appeal against decisions by the NCA under the Australian Capital Territory (Planning & Land Management Act) 1988.
- 2.5 With respect to environmental assessment, as far as can be determined, the NCA did not refer the Griffin Legacy Amendments to the Department of Environment & Heritage under the strategic planning provisions of the *Environment Protection & Biodiversity Conservation Act 1999*.
- 2.6 There is a complete lack of information on the planning basis and planning implications of the Griffin Legacy Amendments.
- 2.7 The NCA proposals are not supported by statistical information of any kind.
- 2.8 Furthermore, there are no site specific controls. Under the category 'Master Plans' the NCA has prepared descriptive material described as 'Detailed Conditions of Planning Design and Development' – however, these are general statements supported by no more than 'indicative' diagrams. There is no Development Control Plan to give statutory force to issues such as:
- floor space ratio, building heights, building to street alignments, street setbacks, street frontage heights, building depth and bulk, building separation, building address;
 - design excellence;
 - sun access to public spaces, sun access to habitable rooms, cross-ventilation;
 - provision of landscape areas, deep soil zones, continuous tree canopy, water-sensitive urban design;
 - pedestrian amenity, permeability, active street frontages;
 - security, crowd control, public accessibility;
 - views and view corridors;
 - on-site car parking, vehicular driveways, service docks, vehicular footpath crossings;
 - ESD performance, energy efficiency and conservation, integrated water cycle management; reflectivity; wind mitigation; waste recycling;
 - advertising, signage etc

- 2.9 Without clearly established statutory controls, development at the symbolic centre of Canberra can be negotiated and varied on a project by project basis, then approved by the NCA – without any right of appeal.
- 2.10 The complete lack of planning data and practical provisions at any scale from metropolitan context to detailed design makes a mockery of the claim that the Griffin Legacy Amendments are based on ‘Principles and Policies’ derived from the work of Walter Burley Griffin.
- 2.11 From his competition submission of 1911-1912 onwards, Griffin’s work was based on a thorough investigation of the Canberra landscape with respect to ‘Occupation’ and ‘Communication’ – i.e. Land Use and Transport – supported by considerations we recognise today as ecologically sustainable design: the integration of environmental, economic and social factors in the making of the city. Griffin anticipated ESD almost a century ago with his celebration of Australian life in the Australian landscape, his subordination of built form to landscape, his extensive public transport network, his great park system, his associated proposals for water recycling, urban horticulture, forest preserves, indigenous plantings – all underpinned by his commitment to the leasehold system as the fundamental basis for controlling land use and funding development.
- 2.12 The Griffin Legacy Amendments contain no information on land use and transport, no measures of sustainability, and no information on funding.
- 2.13 The NCA has taken one aspect of the Griffin Plan – density in Central Canberra – without its essential corollary: an integrated public transport system comprising heavy rail – a central corridor with city and suburban stops – and light rail – an extensive network with trams on every avenue.
- 2.14 No transport plan has been submitted with the NCA proposals, however, the radical downsizing of road capacity in Central Canberra is supposed to be balanced by the construction of peripheral freeways in other parts of Canberra – an uncostered proposition that means ‘more roads’ in a dispersed pattern, a move that will militate against effective public transport provision in the Australian Capital Territory.
- 2.15 The ‘Principles and Policies’ contained in Amendment 56 are a grab-bag of ideas derived from a selective reading of Griffin’s work.
- 2.16 The 60 or so entries in this document are not scaled in importance from fundamental tenets through desired qualities to rules, guidelines and methods.

- 2.17 For example, one of Griffin's most important ideas – the physical expression of the Australian democratic system in the Canberra landscape – is not explicitly mentioned.
- 2.18 Policy 2(f) claims to 'Build on the Griffin Legacy by refocusing the symbolic framework of the 1918 Griffin Plan by consolidating development of national symbols and spaces for commemoration and celebration on the land and water axes, and within the National Triangle' – but the symbolism is not explained.
- 2.19 Griffin's symbolic framework was clearly shown in diagrams he submitted with his competition entry of 1911-1912, and published in the 'Report Explanatory' of his 1913 Plan (see figures 1 & 2 attached to this statement).
- 2.20 These 'Diagrams of Representative Democracy', to use a convenient term, need to be included in Amendment 56 to the National Capital Plan to show how to refocus the symbolic framework of Canberra within the National Triangle bounded by Constitution Avenue, Commonwealth Avenue and Kings Avenue.
- 2.21 In essence, these diagrams – read in association with Griffin's 1913 Plan (figure 3) - indicate that the base of the National Triangle formed by Griffin's Municipal Axis (today's Constitution Avenue) and the Public Gardens on the northern side of the lake, was conceived as the place of the people. Looking across the lake to the Government Group, the completion of the triangle – the convergence of the avenues – expresses the will of the people. The government occupies this space because the people put them there.
- 2.22 Between the people and their government, Griffin sited the Judiciary. The High Court demonstrates this today. Behind the judicial buildings, the principal government departments were grouped as a contained bureaucratic entity around a formal court. The Legislature was raised above the bureaucracy on a natural podium, sited on axis with both Houses of Parliament clearly expressed.
- 2.23 At Capitol Hill – the apex of the triangle – Griffin sited the Executive, the official residences of the Prime Minister and the Governor-General. The view from the Prime Minister's residence over the House of Representatives to the central park and business district of the city affirmed that the Executive required the support of a parliamentary majority and ultimately, the support of a majority of the people.
- 2.24 The central triangle of Griffin's Canberra thus arranged the functions of government in relation to the life of the city to express the very nature and workings of Australia' representative democracy.
- 2.25 For complex reasons, Canberra today does not have this clarity.

- 2.26 If the policy ‘to refocus the symbolic framework’ of the Griffin Plan, proposed in Amendment 56, has any meaning then it must involve re-establishment of the physical relationships and view lines Griffin intended.
- 2.27 The inclusion of Griffin’s ‘Diagrams of Representative Democracy’ in the National Capital Plan will make it mandatory to evaluate all proposals for the Central National Area against the true substance of the Griffin Plan.
- 2.28 Similarly, the inclusion of sustainability criteria – based on Griffin’s principles of public transport, water management, open space provision, nature conservation, community empowerment etc – will make it mandatory to evaluate all proposals for the Central National Area against the true vision of the Griffin Plan.
- 2.29 To effectively embrace Griffin’s ESD principles, future initiatives must demonstrate:
- significant improvements in the sustainability of the built environment in terms of public transport, water management, urban forest management, biodiversity, energy use etc;
 - subservience of built forms to the larger landscape;
 - maintenance and enhancement of the public domain, in particular, preservation of the continuous public foreshore around Lake Burley Griffin;
 - public participation and ‘community building’ as an integral part of the planning and development process of the Central National Area.

2.30 Amendment 56 : The Griffin Legacy – Principles and Policies – Conclusions:

- 2.30 The Griffin Legacy Amendments to the National Capital Plan must be withdrawn and reworked with reference to a fully documented Implementation Plan and Development Control Plan, i.e. a full consideration of environmental impact, heritage impact, traffic engineering, demographic profile, market viability, land ownership, timing, phasing etc.; full resolution of the statutory controls needed to guarantee design quality in the Central National Area; and clear sustainability criteria to evaluate proposals over time.**

To refocus the symbolic framework of Canberra, Walter Burley Griffin’s ‘Diagrams of Representative Democracy’ (figures 1 & 2) must be included in the National Capital Plan to evaluate all proposals for the Central National Area against the true substance of the Griffin Plan.

Similarly, sustainability criteria – based on Griffin’s principles of public transport, water management, open space provision, nature conservation, community empowerment etc – must be included in the National Capital Plan to

evaluate all proposals for the Central National Area against the true vision of the Griffin Plan.

Canberra is more than a 'City Beautiful' exercise; it is a living city facing complex environmental, social and economic challenges, which demand an alternative vision to the low-density, car-based city created by the NCDC. At the same time, the landscape character of the city must be conserved in its ecological, aesthetic and cultural dimensions. Reconciling these imperatives requires more than selective reading of Griffin's ideas to justify property development, it requires the substance and vision of the Griffin Plan to have statutory force as evaluative criteria against which all development proposals for the symbolic centre of Canberra can be assessed.

3.0 Amendment 59: City Hill Precinct

- 3.1 Amendment 59 sets out principles, policies and land uses, together with schematic Master Plan provisions, to guide redevelopment of City Hill in accordance with general statements by the NCA and objectives determined by the Canberra Central Taskforce (CCT), a joint NCA/ACT Government/Property Sector body, which reported in November 2005.
- 3.2 The NCA statements and CCT objectives are in conflict and thoroughly confused.
- 3.3 The CCT evaluated City Hill Precinct as a property development opportunity, part of an overall plan to make Civic 'the first among equals in the hierarchy of town centres within Canberra' (*sic*) – with City Hill Precinct 'the pre-eminent heart of Civic.' (Amendment 59, p.2)
- 3.4 In contrast, the NCA statements describe City Hill Precinct as 'the symbolic heart of City' and 'the municipal heart of central Canberra.' (Amendment 59, p.1)
- 3.5 These are three different types of heart – one commercial, one symbolic and one municipal.
- 3.6 The CCT notion that City Hill Precinct could become the pre-eminent commercial heart of Civic remains part of Amendment 59, but in fact, the Taskforce discovered that the numbers don't work.
- 3.7 The Financial Analysis, which forms Section 8 of the CCT report, *Central Canberra* (November 2005) states 'preliminary financial modeling . . . has shown that there would be significant costs in the development, and these costs would most likely not be fully covered by revenues, even in the longer term.' (*Central Canberra*, p.35)
- 3.8 Unlike the NCA material, the CCT report provides actual numbers: the developable area of the City Hill Precinct – the vacant land between London Circuit and Vernon Circle – comprises 7.9 hectares. Under the planning policies and principles proposed for the Precinct, development of this land parcel would yield a total floor space area of 487,000 m².
- 3.9 The CCT found that there is sufficient commercial office space currently in construction in the ACT to satisfy demand, at historical rates of absorption, until after 2020. As a consequence, the Taskforce concluded, 'it seems likely that it could take 20 years or more to fill the commercial developments in City Hill with tenants.' (*Central Canberra*, p.36).

- 3.10 In assessing the feasibility of residential development in the precinct, the Taskforce based their assessment on the premium end of the market in accordance with the Griffin Legacy ambitions for City Hill. Current demand in the ACT for this market was found to be around 100 properties per year. The CCT report drew the following conclusion: 'if City Hill were to capture 40% of this market, then it would take 27 years to fill the residential component of City Hill' (*Central Canberra*, p.37).
- 3.11 The CCT Financial Analysis of 7.9 hectares on City Hill has major implications for the overall Griffin Legacy project. No numbers are provided by the NCA but the City Hill Precinct probably constitutes less than 25% of the total amount of public land subject to the Griffin Legacy proposals. At the rate of development documented by the Central Canberra Taskforce, the NCA project would take over 100 years to be realised.
- 3.12 The City Hill Precinct makes no sense as the commercial heart of Canberra, as a commercial analysis makes clear. This was never Griffin's intention, in the first place.
- 3.13 In the Griffin Plan, the precinct was always the Civic Centre.
- 3.14 Walter Burley Griffin's competition entry of 1911 designated the crown of City Hill as the site for the Town Hall.
- 3.15 In Griffin's first revision of his competition scheme, prepared in 1913 after he had been invited to Australia and was able to visit the site for the first time, the crown of City Hill became green open space (figure 3). City Hill remained green open space in Griffin's subsequent plans of 1916 and 1918.
- 3.16 The long established tree plantings on the crown of City Hill are based on a Griffin landscape design, carried out by Thomas Charles Weston, as the historical section of the 2004 NCA *Griffin Legacy* report makes clear (*Griffin Legacy*, 2004, p.68).
- 3.17 In the 1960s, the NCDC isolated this green open space by constructing Vernon Circle as a major traffic roundabout on the Northbourne Avenue/Commonwealth Avenue route from North Canberra to South Canberra. The NCDC also narrowed London Circuit and built the North and South Buildings of Civic Square to the narrowed alignment.
- 3.18 Amendment 59 proposes to undo the works of the 1960s by reconstructing Vernon Circle as a minor city street and redirecting Canberra's north-south traffic onto a reconstructed London Circuit plus a series of existing and proposed peripheral parkways/arterials comprising Gungahlin Drive, Majura Parkway, Clunies Ross

Street, Fairbairn Avenue, Marcus Clarke Street and Cooyong/Ballumbir Streets (Amendment 59, p.10).

- 3.19 Amendment 59 thus depends upon extensive roadworks across the ACT and widening London Circuit for most of its length, apart from the stretch adjacent to the retained North and South Buildings, Civic Square.
- 3.20 This plan highlights the need for a clear, effective set of sustainability criteria to evaluate the comparative benefits of planning initiatives throughout Canberra. In ESD terms, the 'traffic calming' of City Hill is clearly not worth the environmental cost of 'more roads' in the rest of the ACT, and the conversion of London Circuit to a major urban arterial.
- 3.21 The purpose of 'traffic calming' on Vernon Circle is to make the green open space of City Hill Park 'an enclosed central park serving a functional role within an urban built form' (Amendment 59, p.4) – in short, a 'people space'.
- 3.22 Central Canberra conspicuously lacks a 'people space' at the moment, apart from the privatised space of the Canberra Mall. However, City Hill should not fulfill this function.
- 3.23 The Walter Burley Griffin Society supports the retention of the central hill top as green open space, as Griffin proposed in his 1913, 1916 and 1918 Plans; the conservation of the Griffin/Weston planting scheme on the crown of the hill; and the continuing role of the green crown as a landmark element in the larger landscape.
- 3.24 This visual and symbolic role for City Hill Park is sufficient, without the extensive re-structuring of arterial roads, overdevelopment of London Circuit, and extensive landscape works necessary to turn the park into a 'people space.' The domed crown – one of the key determinants of Griffin's geometry – is a vital element in the landscape of the Molonglo Valley and must be retained.
- 3.25 We do not support modification of the topography 'to create an urban park, accommodate pedestrian desire lines, and integrate with Vernon Circle' (Amendment 59, p.4) – in other words, flattening the hill.
- 3.26 The heritage values of the landscape vistas to (and from) City Hill Park must be conserved. In particular, the view from Parliament House to the green crowned hill at Civic must remain open by limiting development that can take place on the southern side of the hill and ensuring that intrusive, bulky forms, and narrowing for 'gateway buildings' does not occur in this sector of the precinct.

- 3.27 Constitution Avenue must retain its significance as the base of the National Triangle by meeting Commonwealth Avenue at a clearly defined apex, not a mass of buildings.
- 3.28 Retention of City Hill Park in its current state, clearly visible from Parliament House and clearly positioned with respect to Constitution Avenue is consistent with the NCA statement that *'The Griffin Legacy . . . proposes City Centre-City Hill as the symbolic heart of City'* (Amendment 59, p.1). As a striking, visually prominent green hill in the Molonglo valley, City Hill Park has been the landmark of Civic since the 1920s and should remain that way. Enclosed with buildings, it will lose its prominence and symbolic power in the Canberra landscape.
- 3.29 Stated simply, City Hill Precinct should be the Civic Centre of Canberra, as Griffin intended.
- 3.30 The NCA acknowledges this with the statement, 'the precinct should take its rightful place as the municipal heart of central Canberra' (Amendment 59, p.1).
- 3.31 All that is needed to achieve this objective is a well-sited, well-designed permanent home for the ACT Legislative Assembly.
- 3.32 The meeting place of the Legislative Assembly is the most important functional and symbolic activity in Central Canberra. The relationship of the Assembly building to the everyday life of the city, the ACT Supreme Court buildings and other municipal and cultural activities is a highly complex, highly charged issue. The difficulty in getting this relationship right is demonstrated by the tragic series of design failures in and around the current Civic Square.
- 3.33 Planning for City Hill must return to the Griffin principle of a clear distinction between federal and municipal government, with the Assembly building – the equivalent of Griffin's Town Hall – the terminating element of the Municipal Axis, i.e. Constitution Avenue.
- 3.34 If a high quality municipal precinct is to be achieved in this location, the Legislative Assembly must be sited in strong relationship to Parliament House and the everyday life of the city centre, i.e. it must be conceived as a significant public building, not as a mere appendage to commercial development. It must be a civic building located on a civic square of real human interest and human scale.
- 3.35 All that is needed in City Hill Precinct is to get this right. However, this is not the approach of Amendment 59. No effort has been made to establish siting principles and urban design guidelines for the new Assembly Building. Instead, the site for the ACT Legislative Assembly – identified on the indicative land use plan (Amendment

59, p.5) – is shown as no more than generic commercial buildings in the indicative development plan and aerial perspectives (Amendment 59, pp.12, 16 & 17).

- 3.36 No public space of any consequence is shown in relationship to the Assembly Building and no visual relationship with Parliament House on Capitol Hill.
- 3.37 The aerial perspectives of development in the City Hill Precinct in accordance with Amendment 59 do show the effect of the proposal to site landmark towers, built to Canberra’s maximum height limit of RL 617.00 (14-18 storeys), at the intersections of the main avenues and London Circuit.
- 3.38 Although precedents have been established for towers built to the RL 617.00 limit in the City West precinct, they are not precedents worthy of emulation as works of architecture or as urban design gestures. The WBG Society opposes the location of visually dominant structures in the vicinity of City Hill, and emphasises that Griffin explicitly called for horizontal development in Canberra.
- 3.39 No ground level and heritage vista studies are supplied to support the ‘landmark tower’ proposition, i.e. to establish whether the towers will indeed ‘read’ as meaningful landmarks and markers of Griffin’s geometry at ground level within the city or from significant vantage points in the National Capital.
- 3.40 Considering the city as directly experienced by its citizens – at street level – it is not necessary to emphasise the geometry of the plan with tower elements, but with corner buildings of distinction.
- 3.41 Amendment 59 ‘encourages’ – but does not mandate – the procurement of new buildings through ‘design competitions in order to encourage innovation and design excellence’ (Amendment 59, p.9). However, no criteria to measure design excellence are proposed and no attempt has been made to define a distinct design character and quality for Central Canberra.
- 3.42 The extremely mediocre building stock constructed in Canberra from the 1980s to the present inspires no confidence in the local development industry and the local planning authorities to deliver a city of quality. However, for the most part, this building stock is located well away from the Central National Area. The NCA now proposes to spread this type of building over the symbolic centre of the city, with nothing more than ‘encouragement’ to do better.
- 3.43 Amendment 59 contains no statutory development controls.
- 3.44 To achieve civic amenity and design excellence in such an important city precinct it is essential to set clear, strong controls for floor space ratios, the height and bulk of

buildings, the relationship of buildings to street alignments, building setbacks, resolution of building termination elements /roof features, street frontage awnings and colonnades etc. Amendment 59 mandates none of this.

- 3.45 Amendment 59 does not mention building bulk, although the artist's impressions show many bulky buildings. Strong controls on building bulk are essential to promote environmentally sustainable buildings and achieve elegant solutions of narrow floor plates for residential and commercial buildings. Narrow floor plate buildings achieve high quality living and working environments and good internal amenity and minimise energy use – requirements that should be embedded in the city plan as development standards that must be met.
- 3.46 Amendment 59 does not address building separation for privacy and daylight access and does not address solar access, overshadowing etc.
- 3.47 Amendment 59 zones the whole of the City Hill Precinct – with the exception of City Hill Park, roads and lanes – 'City Centre' with permitted land uses ranging from a casino to a car park (Amendment 59, p.2). For a city of this scale to function well and maintain its vitality it is indeed essential to have a rich mix of uses. However, Amendment 59 does not address how residential, commercial and retail functions will co-exist in the precinct.
- 3.48 Amendment 59 contains no principles of residential amenity to ensure that the distribution of land uses over time maintains the living quality of the city.
- 3.49 In general, Amendment 59 demonstrates complete detachment from the existing urban life and urban qualities of Civic – there is no acknowledgement of the existing pattern of retail activity, for example. There is no assessment of retail demand and thus no basis, beyond wishful thinking, for the statement that 'buildings on the avenues must have predominantly active frontages at ground floor' (Amendment 59, p.6)
- 3.50 Amendment 59 demonstrates similar detachment from existing plans for Civic, for example the City West Master Plan (2004) and the ANU Exchange Master Plan (2005) prepared by the ACT Planning & Land Authority. There is no evidence that the new street and block pattern inserted within London Circuit will improve the connectivity and walkability of Canberra, given the scale of the city, the distribution of major centres of pedestrian activity and the widening of London Circuit to carry the bulk of Canberra's north-south traffic.
- 3.51 Amendment 59 makes no provision for public transport, beyond the conditional statement that 'redevelopment of the City Hill Precinct should take place in the context of an integrated public transport plan. Mechanisms should be introduced to

give priority to public transport' (Amendment 59, p.11). The lack of imperatives on this all-important issue underpins the complete lack of substance in Amendment 59 from beginning to end.

3.52 Amendment 59 – City Hill Precinct – Conclusions

3.53 There is no commercial, economic, heritage or amenity justification for proposing that City Hill be turned into a mass of intrusive buildings. The crown of City Hill should remain green open space and continue in its role as the green landmark element in the larger landscape, preserving the landscape vistas to and from City Hill Park. London Circuit should not be converted to a major urban arterial. All that is needed at City Hill is the correct siting and design of a new and permanent building for the ACT Legislative Assembly. Planning for City Hill must return to the Griffin principle of a clear distinction between Federal and Municipal government, with the Assembly Building the terminating element of Constitution Avenue – Griffin's Municipal Axis – sited in strong relationship to Parliament House and the everyday life of the city centre; and located on a civic square of real human interest and human scale.

4.0 Amendment 60: Constitution Avenue

- 4.1 The decision by the National Capital Authority to complete Amendment 60 to the National Capital Plan without reference to the heritage values of Lake Burley Griffin and the Parliamentary Vista is unacceptable planning practice by any standard.
- 4.2 In 2005, the Authority commissioned consultants to undertake heritage assessments of Lake Burley Griffin and the Parliamentary Vista, and to examine the merits of nominating Canberra to the National Heritage List (NCA *Annual Report 2005-06*, p.191). To date, these heritage studies have not been completed.
- 4.3 The scale of development along Constitution Avenue proposed in Amendment 60 will impact on the aesthetic and historic significance of the Lake, the Central Canberra Parklands and the vistas from Parliament House.
- 4.4 Amendment 60 makes no reference to heritage issues at all.
- 4.5 The proposal is based on development of the extensive tract of land between Parkes Way and Constitution Avenue, within the area Griffin planned as Public Gardens. This was to be the place of the people, as discussed in Section 2.20 of this Statement (above) – the ‘central park’ of the city and the site for national cultural institutions (the National Theatre, National Opera House, National Museums etc).
- 4.6 The proposal to develop a significant section of Griffin’s site for the principal Public Gardens of the National Capital as a commercial/residential precinct is a radical departure from the Griffin Plan, and should not be advanced in Griffin’s name, or claimed to be part of the ‘Griffin Legacy’ in any way.
- 4.7 Planning and design of this area in accordance with Griffin’s principles would see the removal of Parkes Way, the expansion of Commonwealth and King’s Parks to the north, and the construction of major cultural institutions on the park side of Constitution Avenue.
- 4.8 The development proposed in Amendment 60 must be seen as an initiative of the NCA, which will ‘set in concrete’ the bad decision of the NCDC to put a motorway through the middle of Griffin’s most important urban park.
- 4.9 Given the radical and provocative nature of the NCA proposal, the Walter Burley Griffin Society is concerned by the lack of planning and urban design resolution of the scheme, and its lack of understanding of Griffin’s intentions.

- 4.10 The proposal to construct such an extensive tract of commercial/residential development is not supported by any details of gross floor area, or any details of future employment and resident population numbers. Nor is it supported by any planning study of the demand for this type of land use in Canberra, its relationship to other development areas in the ACT, the environmental performance of the built works, the phasing of land release, the differential outcomes expected in the 'Commercial' and 'National Capital Use' zones, and the effect of piecemeal development in such a visually-sensitive location over a long period of time.
- 4.11 As an urban design proposition, the scheme does not establish a new relationship between Parkes Way and the lakeside parklands. Parkes Way will be downgraded from a motorway to a 'boulevard addressed with prestigious buildings' (Amendment 60, p.2) but it will remain a car-dominated space, with no active frontages and no human scale, with a token footpath located 22 m from the building alignment between 4 lanes of arterial traffic and a 2-lane slip road (Amendment 60, pp.12-13).
- 4.12 Like the City Hill proposal, Amendment 60 means 'more roads' for Canberra – doubling the existing width of Constitution Avenue, providing slip lanes along Parkes Way, introducing a new grid of local streets, building major new grade-separated intersections at Commonwealth Avenue and Kings Avenue and, presumably, upgrading the urban arterials through North Canberra: Fairbairn Avenue and Limestone Avenue.
- 4.13 Amendment 60 makes no mention of the traffic impact of downgrading Parkes Way to a boulevard, introducing ten new T-intersections along its length, removing the clover-leaf intersection at Commonwealth Avenue, and removing the traffic roundabouts at Kings Avenue and Corranderk Street.
- 4.14 This tinkering with Parkes Way promises the worst of both worlds – an urban arterial engineered as a city street, working as neither.
- 4.15 The aim of the exercise purports to be the establishment of 'Constitution Avenue as a diverse and active grand boulevard lined with shops, cafes and a mix of commercial, entertainment and residential uses' (Amendment 60, p.1). However, in addition, the exercise aims to establish 'Constitution Avenue as a prestigious address for National Capital Uses' (Amendment 60, p.1).
- 4.16 These aims are in conflict. They have their basis in the decision to zone the western end of Constitution Avenue 'Land Use A' (essentially mixed retail/commercial/residential uses) and the eastern end 'National Capital Uses' (Amendment 60, p.4).

- 4.17 The 'National Capital Use' Zone extends from the Defence precinct at Russell to the new headquarters of the Australian Federal Police in the refurbished Anzac Park West Portal Building.
- 4.18 The expansion of a bureaucratic zone from Russell along the base of the National Triangle is a radical, unacceptable departure from the principles of the Griffin Plan, as set out in Griffin's 'Diagrams of Representative Democracy' (figure 1, WBS term).
- 4.19 Griffin intended the commercial life of the city to extend along the Municipal Axis from the Town Hall at Civic Centre to the Main Railway Station at the Market Centre (figure 3).
- 4.20 Griffin's name for the street that formed the Municipal Axis was not 'Constitution Avenue' but 'Capital Terrace' and it was conceived like Michigan Avenue, Chicago or Princes Street, Edinburgh as a wall of great buildings overlooking the park to the lake and Government Group beyond, with cultural institutions located directly across the street in the green space of the parklands, like the Art Institute of Chicago on Michigan Avenue in Grant Park, or the National Gallery of Scotland in Princes Street Gardens.
- 4.21 This relationship of the everyday life of the business district to the great cultural institutions and central park of the city was the key idea in establishing the base of the National Triangle as a place of inspiration and spontaneous congregation – the place of the people, positioned to look across the central basin of the lake to the Government 'on stage' on the southern shore.
- 4.22 If the NCA does not have the courage to do away with Parkes Way and establish the great park and cultural institutions Griffin intended, it should at least establish the base of the National Triangle as an active, vibrant people space. There is no point in reconstructing Parkes Way as a car-dominated, lifeless urban arterial, it should be reconstructed as 'Capital Terrace', with active frontage along its length, easy street crossings, and direct links to the Central Parklands – in other words, a great urban terrace and overlook.
- 4.23 However, with the combination of a car-dominated Parkes Way and hundreds of metres of 'National Capital Uses' along its length, the new development zone proposed in Amendment 60 will be nothing of the sort – it will continue to perpetuate the empty, lifeless monumentality of Central Canberra.
- 4.24 This dismal future becomes clear when we consider the first 'National Capital Use' planned for the eastern section of the Constitution Avenue precinct.

- 4.25 The project conceived by the NCA to kick-start the Constitution Avenue development is the new headquarters for ASIO and the Office of National Assessments, funded in the 2006-2007 Budget.
- 4.26 This high security, highly secretive building complex is proposed for the grassed woodland site east of Anzac Park East. The very idea that this project will contribute to 'a diverse and active grand boulevard lined with shops, cafes' and 'provide a mix of land uses that contributes to the creation of a 24 hour community with dynamic activity patterns' (Amendment 60, p.2) is of course, absurd.
- 4.27 The ASIO/ONA building complex, with something like a 300 m frontage to both Constitution Avenue and Parkes Way, will be a fortress secured with razor wire, security cameras and crash barriers.
- 4.28 This is a very bad idea and should be abandoned at once. The ASIO/ONA complex should be removed to a remote location like Campbell Park.
- 4.29 To forestall a repeat performance on the part of the Federal bureaucracy, the 'National Capital Use Zone' should be reduced to the immediate surrounds of the Russell Defence Precinct and Constitution Avenue zoned for mixed commercial/residential uses throughout.
- 4.30 Amendment 60 proposes a wall of new buildings, 8-storeys high, along Constitution Avenue and Parkes Way, approximately double the height of the Anzac Park Portal Buildings, rising above the tree canopy of the 'Bush Capital' (Amendment 60, pp.11-14).
- 4.31 This will change the Central National Area forever. Above the sweep of green canopy trees, there will be a prominent wall of buildings on Parkes Way – not a unified composition like the 1960s Portal Buildings, but an assemblage of different buildings.
- 4.32 It is a matter of great concern that the 'Parliament House Vista' is only proclaimed to the south side of Parkes Way – see diagram on p.3 of Draft Amendment 60, August 2006. This diagram has been omitted from the final NCA document. Clearly a new wall of buildings on the north side of Parkes Way will form the dominant urban edge to the views from Parliament House and other vantage points in the Parliamentary Triangle.
- 4.33 Amendment 60 contains no urban design controls to address this situation. To avoid the adverse impacts of piecemeal development – as demonstrated, for example, by private-sector development along Northbourne Avenue since the 1980s – the quality of architecture along this wall of buildings will be all-important. Controls to ensure

the consistency and quality of architectural expression along Parkes Way must be demonstrably more stringent and effective than anything achieved to date in Canberra.

4.34 In the city wide context, the buildings planned for the north side of Parkes Way will have the most prestigious location in Canberra, fronting not only the main city park but also the nationally significant cultural facilities and government buildings – the High Court, National Gallery, National Library and Parliament House. They therefore demand special attention in terms of controls to ensure the highest quality architecture distinguished by unified character and form; considered approach to façade modulation, materials and colour; consistent setbacks, shadow lines and roof forms; clear relationship to the street and the pedestrian scale of the city; positive use of landscape elements; fine proportions; functional clarity; architectonic rigour; and compositional coherence.

4.35 The NCA has put no effort into this considerable challenge. Instead, attention has been diverted to the least pressing issue in Central Canberra – a new landscape design for the Central Parklands comprising Commonwealth Park, the Rond Point Terraces and Kings Park. A major international competition for the redesign of the Central Parklands was launched on 12 February 2007. This is a trivial, irrelevant undertaking in the context of the serious damage Amendment 60 will make to the landscape of Central Canberra.

4.36 Amendment 60: Constitution Avenue – Conclusions:

4.37 No planning for the Constitution Avenue Precinct should proceed without reference to the heritage values of Lake Burley Griffin, the Central Parklands and the views from Parliament House and the Parliamentary Triangle. If implemented in its present form, Amendment 60 will cause serious and irreversible damage to the symbolic centre of Canberra with a wall of new buildings, 8-storeys high the full length of Constitution Avenue and Parkes Way, rising above the tree canopy of the ‘Bush Capital’. The strongest urban design and architectural guidelines ever developed in Australia are needed to produce an acceptable assemblage of buildings in this location facing the Parliamentary Triangle. The most effective way to achieve this – and overcome the negative impact of the NCA’s current proposals – will be to limit the height of buildings in this location to 4 storeys (16 m) along the full length of Parkes Way and Constitution Avenue, i.e. within the established tree canopy of the National Capital. Under no circumstances should the current proposal to site the new headquarters for ASIO and the Office of National Assessments on a 300 metre frontage to Constitution Avenue and Parkes Way proceed.

5.0 Amendment 61: West Basin

- 5.1 As with the Constitution Avenue/Parkes Way proposal, the decision by the National Capital Authority to complete Amendment 61 to the National Capital Plan without reference to the heritage values of Lake Burley Griffin and the Parliamentary Vista is unacceptable planning practice.
- 5.2 The scale of development on the West Basin foreshore proposed in Amendment 61 will impact on the aesthetic and historic significance of the Lake and significant views from Parliament House.
- 5.3 The Walter Burley Griffin Society does not support the scale of the proposal to extend the city to Lake Burley Griffin at West Basin, and create a commercial waterfront development in the Central National Area.
- 5.4 Griffin did not propose urban development on the lakefront in this location.
- 5.5 Griffin placed great emphasis on public open space along the Lake foreshores and planned extensive parklands around West Basin. The Griffin plan of 1913 shows a network of green parks in this area (figure 3). No version of the Griffin Plan shows continuous urban development extending to the foreshore of West Basin.
- 5.6 Amendment 61 proposes construction of a land bridge over Parkes Way/Tuggeranong Freeway and extension of a grid of city streets and development sites from London Circuit to a 'Darling Harbour'-style waterfront development on land reclaimed from the West Basin of Lake Burley Griffin, comprising a broadwalk, waterfront restaurants, commercial jetties, convention centre and a luxury hotel.
- 5.7 We reject the proposition that this foreshore reclamation can be justified because it replicates the circular geometry of Griffin's scheme for West Basin (Amendment 61, pp.1, 6).
- 5.8 Griffin's geometry was part of a brilliantly-conceived formality at the centre of the Canberra Plan, in which the tautness and symmetry of the lake edges, designed as a continuous, horizontal expanse of stepped 'ghats', focussed attention on the consistent alignment of the city's public buildings generated from the crossing of the Land Axis and Water Axis. For complex reasons, this geometry was not adopted when the NCDC built the lake in the 1960s. The overall composition of the central basins was retained, but not the precise geometry. Instead, a more picturesque, naturalistic setting was created at the centre of Canberra.

- 5.9 The loss of formality and precision in the landscape and waterscape of Canberra is a significant departure from the Griffin Plan. However, for Griffin's geometry to 'read' as he intended, it would have to be established across the complete composition of central basins, extending from Acton to Pialligo. There is clearly no intention to do this.
- 5.10 To carry out a fragment of the Griffin Plan on the city side of West Basin is no more than a self-serving appropriation of Griffin's design language to create more property development opportunities.
- 5.11 Reclamation of the foreshore in this location would not 'realise key elements of the geometry and intent of the 1918 Griffin Plan at West Basin,' (Amendment 61, p.1) but rather establish a dangerous precedent for urban encroachment on Canberra's greatest asset, Lake Burley Griffin.
- 5.12 No case has been established for filling in this section of the Lake in terms of Griffin's principles or precedents. We believe waterfront development that is predicated on filling in the Lake is fundamentally flawed.
- 5.13 We note with concern that the NCA scheme for West Basin has grown significantly in scale, intensity and extent of intrusion on the waterfront between the release of the 2004 *Griffin Legacy* study in 2004 and the preparation of Amendment 61 in 2006.
- 5.14 In 2004, the NCA proposed an understated green edge to the West Basin development consisting of a promenade set in grass and trees around the north-east quadrant of the basin, a small ferry terminal and a tree-lined grass amphitheatre on the Water Axis at Acton (figures 4, 5 & 6).
- 5.15 By 2006, this had grown to a promenade set in hardscape, a waterfront filled with commercial pavilions and tourist jetties, and at Acton a luxury hotel and a large 'Cultural Centre' built on more landfill protruding into the lake (figures 7, 8, 9 & 10).
- 5.16 The so-called 'Cultural Centre' is widely understood to be a new convention centre for Canberra (*Canberra Times*, 20 February 2007).
- 5.17 Underpinning the manipulation of imagery in the NCA promotional material, there is a serious and unacceptable planning move.
- 5.18 The foreshore is not protected by a continuous zone of 'open space/waterfront promenade' – the north-west quadrant of West Basin is zoned 'Land Use C', with permitted uses including hotel, cultural facility, national capital uses.

- 5.19 This zoning will permit construction of a large convention centre and associated hotel on the foreshore of the Acton peninsula.
- 5.20 The convention centre/hotel proposal – or a series of structures of equivalent scale and bulk permitted under the ‘Land Use C’ zoning – will be a prominent and unacceptable intrusion on the Canberra landscape.
- 5.21 The effect of waterfront development of this scale can be judged by comparing the artist’s impression published in the 2005-2006 NCA Annual Report (figure 10) with ‘The Waterfront’ residential development at Kingston Foreshore (figures 11 & 12).
- 5.22 The Acton development appears to be three times the size and pushed to the water’s edge, in contrast to the Kingston Foreshore development, but the aim of the projects is the same – to grab the water views (figure 11).
- 5.23 Like ‘The Waterfront’, the Acton scheme is proposed on the basis of unimpeded views, with no trees in front of the hotel and token planting in front of the convention centre (figures 8, 9 & 10, see also Amendment 61, p.13).
- 5.24 The whole project at Acton demonstrates the inadequacy of the NCA planning process. The location of a hotel/convention centre complex in this part of Canberra contradicts the planning principles of the ‘Griffin Legacy’ initiative, ignores significant heritage issues, and twists Griffin’s ideas and ideals to achieve the opposite of his intentions.
- 5.25 In terms of ‘Griffin Legacy’ planning principles, a hotel/convention centre at Acton does not activate the city with a vibrant mix of uses, but perpetuates the Canberra syndrome of isolated buildings in the landscape, located hundreds of metres from anything else.
- 5.26 In terms of heritage issues, a hotel/convention centre at Acton entails the destruction of a significant heritage site – the Acton Peninsular Limestone Outcrops on Lawson Crescent, a Listed Place on the Commonwealth Heritage Register (Australian Heritage Register Place ID105344, Place File no.8/01/000/0491).
- 5.27 This site is not mapped in the diagram of ‘Indicative Heritage’ on p.7 of Amendment 61.
- 5.28 The Limestone Outcrops mark the beginning of European settlement at Canberra – as stated in the Australian Heritage Register listing, ‘The first European explorers named the Canberra region the Limestone Plains. Very little limestone is now exposed, it has either been built over or submerged by Lake Burley Griffin. The only

accessible, clear and continuing exposure of the limestone in suburban Canberra is on the northern shore of Acton Peninsula.'

- 5.29 This location on the Acton Peninsular is also significant as a site of 'first contact' between the Aboriginal people of the Molonglo valley and the European settlers.
- 5.30 Archeological evidence has established that the Acton Peninsula is an important Aboriginal site, as the Australian Heritage Listing makes clear: 'Aboriginal artefacts recovered on the site by H P Moss between 1937-41 indicate that Aborigines occupied the area skirting the base of the mountain and on either side of the river. Thirty artefacts and twenty-three items of debitage were recovered from the site of the early Federal Capital Administration Offices and from the site of the Canberra Hospital Buildings which were constructed in the early 1940s. It is still possible that more archaeological evidence exists within the Peninsula.'
- 5.31 Again, as stated in the Australian Heritage Register listing, 'Acton Peninsula was the site of the first formal acquisition of land by Europeans on the Limestone Plains. It marks the beginning of an historical phase which had profound ramifications for Aboriginal culture.'
- 5.32 The human consequences of first contact are recorded in a moving, terrifying story retold by Canberra historian Lyall Gillespie from a nineteenth century account given by a daughter of early Canberra settlers: 'the blacks once planned to murder all the men on Acton Station' but a 'kind-hearted' aboriginal woman warned the white settlers and 'when the blacks came they met a "warm reception"' The aboriginal woman who gave the warning 'was killed and her remains were thrown among some rocks, "where her bones lay bleaching when my parents first came to Acton on Christmas eve 1838"' (Lyall Gillespie, *Aborigines of the Canberra District*, 1984, p.34).
- 5.33 This is not the site for a convention centre and luxury hotel.
- 5.34 In terms of Griffin's ideas and ideals, the waterfront of West Basin is similarly inappropriate as a convention centre/hotel site.
- 5.35 The siting on Acton foreshore is rationalised in Amendment 61 on the basis that it expresses Griffin's geometry where the Water Axis crosses the lake edge (Amendment 61, pp.2, 5, 6 & 13).
- 5.36 Griffin's Water Axis is the east-west generative line of his scheme projected from the summit of Black Mountain at right angles to the Land Axis, projected from the summit of Mount Ainslie. (To be accurate, the alignment is more NW-SE).

- 5.37 Unlike the strongly defined Land Axis, the Water Axis has always been more subtle.
- 5.38 Griffin intended the geometry to 'read' in the urban landscape by the consistent alignment of all public buildings in Canberra, including the University buildings at Acton, on the fundamental cross-axis of the city.
- 5.39 This simple, powerful, beautiful idea has not been followed in the subsequent development of the National Capital. The haphazard alignment of public buildings – particularly in this part of Canberra, the haphazard alignment of buildings on the ANU campus – has long since removed the possibility of a clear, underlying geometric order to the public landscape outside the surviving elements of Griffin's road pattern.
- 5.40 It is gratuitous and self-serving to resurrect this idea to promote a major development opportunity on landfill pushed into Lake Burley Griffin.
- 5.41 It is also meaningless in terms of the real conditions of the site. At the water's edge, the Water Axis is completely undetectable. The vista across West Basin does not project down the lake past the great buildings of the Parliamentary Triangle. It is blocked by the concrete stanchions and roadways of the Commonwealth Avenue Bridge.
- 5.42 The principal element in the vista from the convention centre/hotel site is the traffic crossing Commonwealth Avenue Bridge.
- 5.43 Griffin's idea was to site an amphitheatre higher on the Acton Ridge as a magnificent outdoor convocation place for the University, poised above the lake to have a sweeping vista over the Commonwealth Avenue Bridge down the Water Axis - which in this location, was also the main axis of the campus plan (figure 3).
- 5.44 Something of this idea was shown in the 2004 NCA *Griffin Legacy* document (figure 5) although at the wrong level – the water's edge, not high on the ridge – and isolated from the main part of the ANU campus.
- 5.45 How this 'green scheme' morphed into a major group of lakefront buildings (figure 9) is not explained by the NCA, but like the ASIO/ONA proposal for Constitution Avenue, it seems that any idea that comes along is shoe-horned into the 'Griffin Legacy' development – no matter how inappropriate – and justified to the world as Griffin's idea.

- 5.46 One of the clearest, most consistent principles of Walter Burley Griffin's life and work was his commitment to continuous public access to the foreshore. This was a distinguishing characteristic of the Canberra Plan and the Castlecrag venture.
- 5.47 The foreshore of Lake Burley Griffin must be protected by a continuous zone of open space.
- 5.48 It is not sufficient to argue that a 'continuous pedestrian network' will suffice, as the NCA claims (Amendment 61, p.8).
- 5.49 A pedestrian walkway on a narrow sliver of land in front of a luxury hotel reduces the public to intruders in a world of privilege, as the experience of walking in front of the open window walls of the silver service restaurant at the Hyatt Hotel, Campbell's Cove, Sydney demonstrates.
- 5.50 The foreshore must be a wide, generous, continuous zone of open space, planted with a continuous avenue of trees to modulate the pedestrian experience and to screen urban development.
- 5.51 The key to achieving this outcome is to zone the foreshore 'Open Space/Waterfront Promenade' all the way around West Basin, i.e. remove the 'Land Use C' zoning of the Acton Peninsula frontage, remove the convention centre/hotel proposal from contention and return this section of the West Basin scheme to the 'green' condition shown in the 2004 NCA *Griffin Legacy* document (figure 5).
- 5.52 The so-called 'Immigration Bridge' designed by Bligh Voller Nield for the new lake crossing between the National Museum of Australia and Lennox Gardens on the southern foreshore at Parkes introduces another design element and design language to the landscape and waterscape of Canberra.
- 5.53 The bridge neither completes the circle of Griffin's West Basin – as Griffin himself proposed for a bridge at this location (figure 3) nor relates to the forms and spaces of the National Museum, as Ashton Raggett McDougall proposed in their exuberant winning entry in the NMA competition of 1997.
- 5.54 The design is generated by yet another tenuous projection of Griffin's geometry, the alignment of Prince Edward Terrace in front of the Treasury Building at Parkes. This has nothing to do with West Basin, nor does the repetitive rhythm of cable-stayed structural elements that march across the lake to support a strange, undulating deck.
- 5.55 The Ashton Raggett McDougall competition-winning scheme is the only defensible – and honourable – design for a bridge in this location, with its sweeping curved

forms that continue ARM's brilliant and complex tangle with Griffin's geometry, while at the same time respecting – not weakly mimicking – that geometry.

- 5.56 The Amendment 61 proposal for the waterfront promenade on the north-east quadrant of the West Basin foreshore is an example of a geometric solution that weakly mimics Griffin's work. In plan, this promenade introduces a lost fragment of Griffin's geometry at the expense of filling in the lake.
- 5.57 However, the cross-section of the promenade has been improved following the public consultation phase of the 'Griffin Legacy' project – the width of the building setback from the water's edge has been increased from 45 m to 55 m (Amendment 61, pp.8, 12).
- 5.58 Building height in this location has been limited to 'approx. 4 storeys (16 m)' (Amendment 61, p.8).
- 5.59 Although this seems reasonable, it must be recognised that the five blocks of urban development facing West Basin represent one of the few opportunities for waterfront development in Canberra. There will be strong, unrelenting pressure to get more development and more views along this edge, as demonstrated at Kingston Foreshore over the past 10 years.
- 5.60 The development industry will be looking for more opportunities like 'The Waterfront' at Kingston Foreshore, i.e. unique building forms to maximize views, penthouse extensions to the 4 storey limit, and no trees to block the views (figures 11 & 12).
- 5.61 The West Basin scheme needs statutory design controls to enforce compliance, not 'indicative' controls renegotiated on a project-by-project basis.
- 5.62 The West Basin scheme also needs installation of the foreshore promenade before any land release – complete with the full five rows of avenue trees indicated in Amendment 61 (pp.8, 12) – to forestall the situation that has developed at Kingston Foreshore: a public realm bereft of trees dominated by a gated residential development that intends to keep it that way (figure 12).
- 5.63 Amendment 61 permits 2-storey pavilions on the lake side of the waterfront promenade. Together with jetties extending into the lake, this plethora of commercial concessions will urbanise the edge of Lake Burley Griffin. The construction of buildings on the water is completely unacceptable – as any heritage assessment of the lake should establish.

- 5.64 Amendment 61 also permits 8 storey buildings (16 m) immediately behind the buildings facing the promenade, and along Commonwealth Avenue, with the possibility of buildings up to 25 m, or indeed 'above 25 m' (Amendment 61, pp.6, 12 & 14).
- 5.65 The effect of a gaggle of buildings crowding the landscape of the Central National Area can already be seen with the recent tower developments in the Civic West precinct.
- 5.66 High buildings in the West Basin precinct, pushed to get water views, will compound this unfortunate legacy of mediocre planning and design.
- 5.67 This all has to be understood in the context of a small town with a current population of 320,000, a declining growth rate for the past 15 years and an estimated population of 480,000 – at best – by 2033 and most likely 380,000 (ACT Government, *Economic White Paper for the Australian Capital Territory*, 2004, pp.15, 27).
- 5.68 These facts are conspicuously missing from the NCA material – but they call into question the need for high-rise development of any sort.
- 5.69 Given the demographic profile and character of Canberra, the city should take the low-rise high density route, limit the height of continuous urban fabric to no more than 4-storeys, and maintain the human scale, solar access and 'garden city' attributes of a beautiful, distinctive place set within the canopy of one of the most magnificent urban forests in the world.
- 5.70 Canberra is at a 'make or break' point in its development, it can capitalize on its existing qualities or destroy them. To demonstrate this point, we need only consider the implications of the Amendment 61 proposal to line the western side of Commonwealth Avenue from City Hill to the Lake with 8 storey buildings.
- 5.71 Apart from severely limiting, if not destroying, the visual relationship between Parliament House and City Hill discussed in Section 3.26 (above), this development will destroy one of the most important experiences in today's Canberra, the effect of coming around City Hill to discover a magnificent landscape – a series of exhilarating vistas, which lift across the western reaches of Lake Burley Griffin to the distant Brindabella Ranges.
- 5.72 Amendment 61 proposes to replace this defining Canberra experience with a wall of buildings like the towers of City West. Nothing could demonstrate with greater clarity, the mistaken basis on which the 'Griffin Legacy' Amendments have been advanced – a set of preconceived solutions have been worked up with artist's impressions but without analysis or understanding of the city at any level.

5.73 Amendment 61: West Basin - Conclusions

5.74 Overall, the scale of the proposed development in the West Basin Precinct must be substantially reduced in accordance with the following principles:

- no reclamation of the Lake shore, nor encroachment on the waterscape by commercial piers extending into the Lake;
- stringent statutory protection of the continuous public foreshore by the establishment of a single, continuous 'Open Space' zone around the Lake, i.e. not the patchwork of 'Open Space', 'Land Use C' and 'Road' zones proposed in Amendment 61;
- the 'Open Space' zone must be of sufficient width to maintain the public character of the foreshore promenade, i.e. private, commercial interests must not dominate the foreshore experience and buildings must not be permitted on the water's edge;
- no luxury hotel and convention centre on the waterfront at Acton under any circumstances;
- restriction of urban development in this visually sensitive location to no more than 4-storeys, with key public vistas to the lake and the Brindabellas maintained;
- commitment to a continuous avenue of tall tree plantings of indigenous species around the full extent of the foreshore promenade from the Commonwealth Avenue bridge to the National Museum of Australia, not interrupted at any point for axial features, or 'private views' from foreshore development sites;
- commitment to unified urban design and architectural controls; the highest standard of environmental performance; and the maintenance of design excellence throughout the planning, design and construction stages of the project (a standard so far not achieved in Canberra's commercial development).

Given the demographic profile and character of Canberra, there is no need for high-rise development at all. The city should take the low-rise high density route, limit the height of continuous urban fabric to no more than 4-storeys, and maintain the human scale, solar access and 'garden city' attributes of a beautiful, distinctive place set within the canopy of one of the most magnificent urban forests in the world.

6.0 The Public Consultation Process

6.1 This is a defining moment in the history of Canberra. Amendments 56, 59, 60 and 61 to the National Capital Plan have been approved by the Minister for Local Government, Territories & Roads – yet they are demonstrably inadequate and unacceptable as a planning and design proposal for the city, and as a response to the historical component of the 2004 *Griffin Legacy* study.

6.2 The process by which Ministerial approval was granted prior to review by the Joint Standing Committee on the National Capital & External Territories is beyond the comprehension of the Walter Burley Griffin Society.

6.3 However, it is commensurate with our experience of the consultation and decision processes of the National Capital Authority.

6.4 The issue of the public consultation process employed by the NCA was reviewed by the Joint Standing Committee on the National Capital & External Territories in its 2004 inquiry into the role of the NCA.

6.5 At that time, the Joint Standing Committee made the following comments:

The issue of the consultation process employed by the NCA has been of concern to the Committee for some time. Despite the Committee relaying its concerns to the Authority, on the basis of complaints the Committee has received, the situation does not appear to have been rectified. The Committee examines proposed works on behalf of the Parliament on the understanding that the Authority has sought advice from all interested stakeholders. The Committee finds that it now has to be more sceptical when examining proposals from the NCA. The Committee is particularly concerned that the Authority appears to consider that simply informing stakeholders of its proposal, rather than actively engaging in a two-way process, is sufficient consultation (Joint Standing Committee on the National Capital & External Territories, *A National Capital, A Place to Live: Inquiry into the Role of the National Capital Authority*, Canberra, July 2004, Section 8.14).

6.6 In 2004, the Joint Standing Committee was concerned that the *Australian Capital Territory (Planning and Land Management) Act 1988* makes no reference to public notification and consultation with respect to work proposals in Designated Areas and made recommendations with respect to this issue.

- 6.7 The Committee noted that the Act does contain public consultation provisions with respect to amendments of the National Capital Plan but did not investigate the operation of these provisions.
- 6.8 The manner in which public consultation was conducted by the NCA on Amendments 56, 59, 60 & 61 to the National Capital Plan indicate that these provisions require substantial amendment.
- 6.9 In summary, the NCA invited public comment on the Griffin Legacy Amendments in August 2006. Something in the order of 350 written submissions were received.
- 6.10 At this point, the NCA invoked the *Privacy Act* on the basis that submissions had been called without the option of a privacy waiver.
- 6.11 As a consequence, the original written submissions were not available for public review and the authors of the submissions were not identified.
- 6.12 The Consultation Reports issued by the NCA in November 2006 on the four Griffin Legacy Amendments only identified the submissions by number, and assigned different numbers to submissions from the same parties in the four reports.
- 6.13 The NCA asserted that the responses were overwhelmingly favourable. The Consultation Reports are extremely difficult to decipher, but a close reading reveals that many complex and fundamental issues, warranting careful consideration, were raised by members of the public, even those who supported the NCA initiative.
- 6.14 The attitude of the NCA to the consultation process is best expressed by a comment made to the property industry by one of its senior officers: 'the conflicts that have been identified have been of a remarkably trivial nature' (*Property Australia*, February 2007, p.30).
- 6.15 The Walter Burley Griffin Society contends that nothing could be further from the truth.
- 6.16 We draw the following conclusion from our experience. Public consultation procedures with respect to National Capital Plan amendments may have been adequate in the past. However, they are demonstrably inadequate in the context of fundamental changes to Central Canberra and the establishment of high density residential districts on National Land.
- 6.17 The same public consultation procedures should apply to land administered by the National Capital Authority and land administered by the ACT Government. The same principle applies to planning legislation and appeal rights. If the Griffin Legacy

Amendments proceed in any significant way, new residential districts will be established in Canberra. The citizens of one residential district should not have different rights than citizens of another.

6.18 At the moment, the ACT Government seems to have a rigorous and defensible public consultation process under the terms of the *Land (Planning & Environment) Act 1991 (ACT)*.

6.19 This process does not invoke the *Privacy Act* to prevent the flow of information and keep control of the debate.

6.20 The ACT process allows the public to review public submissions, as original documents, to identify the authors – and thereby the interests – represented by the submissions.

6.21 The NCA prepared dot point summaries of the submissions, did not make the original submissions available, and did not provide information to establish the interests and credentials of those making the submissions.

6.22 This process facilitated the marginalisation of critique and the re-presentation of material from the NCA perspective.

6.23 As a consequence, the NCA did not engage with any fundamental critique of its planning process or its detailed plans, and responded to the public submissions with minor changes and small concessions.

6.24 The Public Consultation Process - Conclusions

6.25 The NCA's public consultation procedures with respect to National Capital Plan amendments are demonstrably inadequate in the context of fundamental changes to Central Canberra and the establishment of high density residential districts on National Land.

The public consultation provisions of the *Australian Capital Territory (Planning and Land Management) Act 1988 (Commonwealth)* and the *Land (Planning & Environment) Act 1991 (ACT)* should be standardised to establish the same procedures throughout the Australian Capital Territory, based on transparency and the public interest.

7.0 Conclusions

As a planning exercise, the Griffin Legacy Amendments to the National Capital Plan prepared by the National Capital Authority in 2006 and approved by the Minister for Local Government, Territories & Roads on 7 December 2006 has been inadequate from beginning to end.

The Griffin Legacy Amendments propose significant, far-reaching and irreversible changes to Central Canberra. The Amendments entail extensive real estate development on the public lands of the Central National Area – a multi-billion dollar proposal to sell the development rights of a significant section of the symbolic centre of the National Capital.

The Amendments have been presented with no supporting planning data, and no statutory controls to ensure design quality of the outcomes.

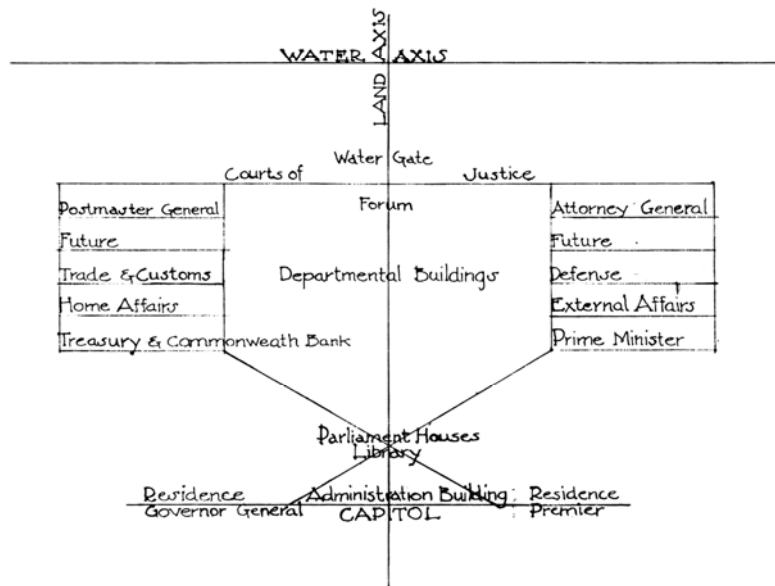
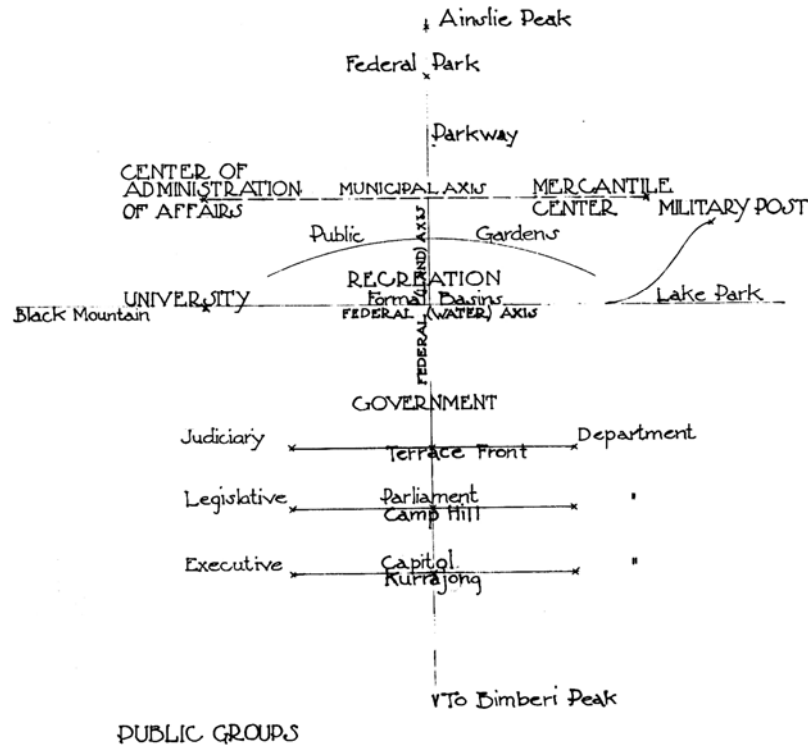
Throughout the exercise, the name of Walter Burley Griffin has been used to advance an utterly mediocre proposal that will compromise Canberra forever.

The Walter Burley Griffin Society concludes that Amendments 56, 59, 60 & 61 to the National Capital Plan must be withdrawn and reworked with reference to a fully documented Implementation Plan and Development Control Plan, i.e. a full consideration of environmental impact, heritage impact, traffic engineering, demographic profile, market viability, land ownership, timing, phasing etc.; full resolution of the statutory controls needed to guarantee design quality in the Central National Area; and clear sustainability criteria to evaluate proposals over time.

Overall, the scale of the proposals must be substantially reduced. Given the demographic profile and character of Canberra, there is no need for high-rise development. The city should take the low-rise high density route, limit the height of continuous urban fabric to no more than 4-storeys, and maintain the human scale, solar access and 'garden city' attributes of a beautiful, distinctive place set within the canopy of one of the most magnificent urban forests in the world.

The Society further concludes that the public consultation procedures of the National Capital Authority must be revised to bring them in accordance with those of the ACT Government.

The scale and complexity of the changes to the symbolic centre of Canberra proposed by the National Capital Authority, and the cavalier manner with which they have been advanced, must be a matter of grave concern to all Australians.



GOVERNMENT GROUP (Scheme 1)

Figures 1 & 2. Walter Burley Griffin, Diagrams showing disposition of the People, the Judiciary, Government Departments, the Legislature and the Executive as an expression of representative democracy in the Canberra landscape (Source: *Report Explanatory of the Preliminary General Plan*, October 1913).



Figure 3. Walter Burley Griffin, Plan of Canberra (detail), 1913 (Source: *Report Explanatory of the Preliminary General Plan*, October 1913).

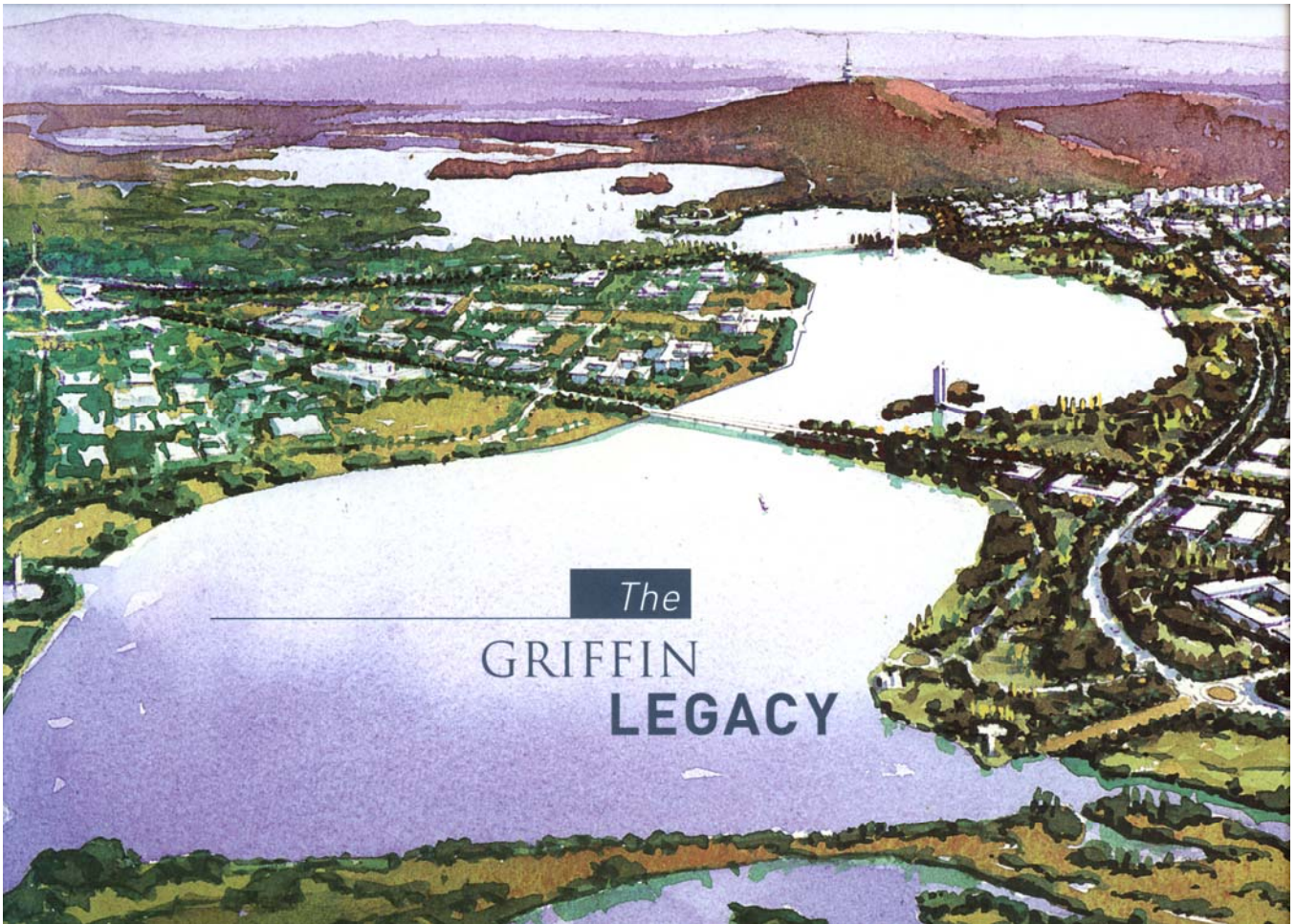


Figure 4. National Capital Authority, The defining image of *The Griffin Legacy* study, 2004 – note West Basin completely fringed with trees as a green extension of the lakeshore parklands (Source: NCA, *The Griffin Legacy*, 2004, cover).

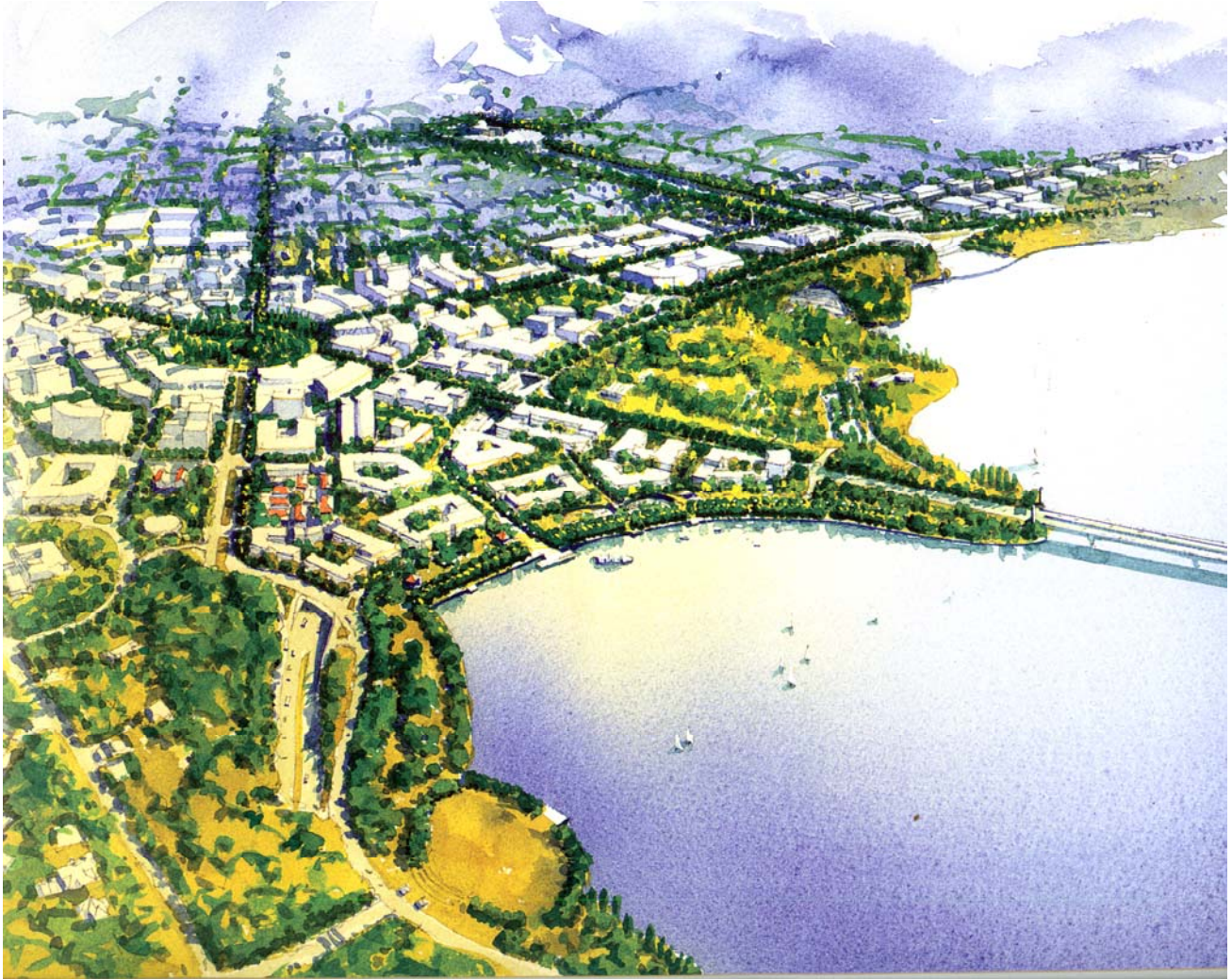


Figure 5. National Capital Authority, Aerial perspective of the West Basin Precinct, 2004 – note the tree-fringed foreshore and the grassed amphitheatre at Acton in the foreground (Source: NCA, *The Griffin Legacy*, 2004, foldout sheet after p.173).



Figure 6. National Capital Authority, Waterfront Promenade, West Basin, 2004 – note the walkways set in a soft landscape of grass and trees (Source: NCA, *The Griffin Legacy*, 2004, foldout sheet before p.176).



Figure 7. National Capital Authority, Waterfront Promenade, West Basin, 2006 – note the pedestrian space transformed into a continuous hardscape, however, also note the absence of 2-storey pavilions and commercial jetties on the water's edge (Source: NCA, Amendment 61, December 2006, cover).



Figure 8. National Capital Authority, Aerial perspective of the West Basin Precinct, 2006 – note the 'urbanised' edge to the lake with 2-storey pavilions and jetties projecting into the water from the hardscape of the Waterfront Promenade; the prominently sited hotel and convention centre built on landfill along the Acton foreshore, with no trees to interrupt water views; and the awkwardly resolved pedestrian bridge extended across the lake from the National Museum (Source, NCA, *American Architecture* 61, December 2006, p.14).



Figure 9. National Capital Authority, Model of the Griffin Legacy Project (detail view of West Basin), Regatta Point Planning Exhibition Installation, August 2006 – note the scale and prominence of the lakeside hotel and convention centre (Author's photograph, February 2007)



Figure 10. National Capital Authority, Waterfront Promenade, West Basin, 2006 – note the dominant structures on the now thoroughly 'urbanised' lake edge: pavilions and jetties extending into the lake from the promenade; and the hotel/convention centre projected aggressively in front of the tree line at Acton (Source: NCA, *Annual Report 2005-2006*, p.25).



Figure 11. Andrew Andersons, PTW Architects – ‘The Waterfront’, Kingston Foreshore, 2006 – the water view (Source, Stockland Sales Brochure, *Exclusive Lakeside Living*, July 2006).



Figure 12. Andrew Andersons, PTW Architects – ‘The Waterfront’, Kingston Foreshore, 2006 – the treeless foreshore landscape to guarantee the water view (Source, Stockland Sales Brochure, *Exclusive Lakeside Living*, July 2006).

Appendix 1 – Statement Authorship

This Statement was prepared by Professor James Weirick, President of the Walter Burley Griffin Society Inc. on behalf of the WBGs Management Committee and the Committee of the WBGs Canberra Chapter.

Preparation of the Statement was assisted by Brett Odgers, Chairman of the WBGs Canberra Chapter and drew upon contributions from the following members of the Society: Chris Bettle, Adrienne Kabos, John Kabos, Bob McKillop, Kerry McKillop, John McManus and Margaret Petrykowski.

James Weirick is Professor of Landscape Architecture and Director, Urban Development & Design Program, Faculty of the Built Environment, University of New South Wales.

A graduate of Harvard University, Professor Weirick taught at the Boston Architectural Center, University of Massachusetts/Boston, University of Canberra and Royal Melbourne Institute of Technology, prior to his appointment to UNSW in 1991. His research interests include the history of architecture, landscape architecture and urbanism, with an emphasis on the ‘politics of design’, particularly the work of Walter Burley Griffin, the history of Canberra, and the urban landscape of Sydney. He is actively engaged in issues of contemporary urbanism throughout Australia as an educator, critic, and commentator.

Professor Weirick has served on the Environment Board of the Royal Australian Institute of Architects (NSW); the Parliamentary Zone Advisory Panel, National Capital Authority, Canberra; the Urban Design Advisory Committee, NSW Department of Urban Affairs & Planning; the Gateways Design Review Panel, City of Sydney; and the Campus 2010 Design Review Panel, University of Sydney. He currently serves on the Design Review Panel, Sydney Olympic Park Authority.

Professor Weirick has been a member of many design competition juries, most recently as a City of Sydney representative on the Design Excellence Competition for the Westfield Sydney Centrepont Redevelopment. He received the President’s Award of the Australian Institute of Landscape Architects (NSW Group) in 1999; and was named a ‘Built Environment Exemplar’ in the Year of the Built Environment 2004.

Professor Weirick has been President of the Walter Burley Griffin Society since 2004, and previously served as Vice President, 1993-2004.

Appendix 2 – The Walter Burley Griffin Society Inc

The Walter Burley Griffin Society Incorporated is a not-for-profit association incorporated under the *Associations Incorporation Act 1984* (NSW).

Established in 1988 in Sydney, the Society commemorates the lives and works of Walter Burley Griffin (1876–1937) and Marion Mahony Griffin (1871–1961) and promotes the environmental ideals and community life they fostered in Australia.

Aims and objectives

- to commemorate and promote a better understanding in Australia and internationally of the lives, ideals, vision and works of the Griffins;
- to promote the preservation and conservation of landscape designs, buildings and other works designed by or having an association with the Griffins;
- to establish a collection of archival material, books, photographs, audio-visual materials, architectural drawings, photographs and objects relating to the Griffins;
- to conserve, house and display the collection for the education and enjoyment of the general public;
- to support research into the lives and works of the Griffins and offer a research service to scholars, media and interested persons;
- to raise funds for the above purposes.

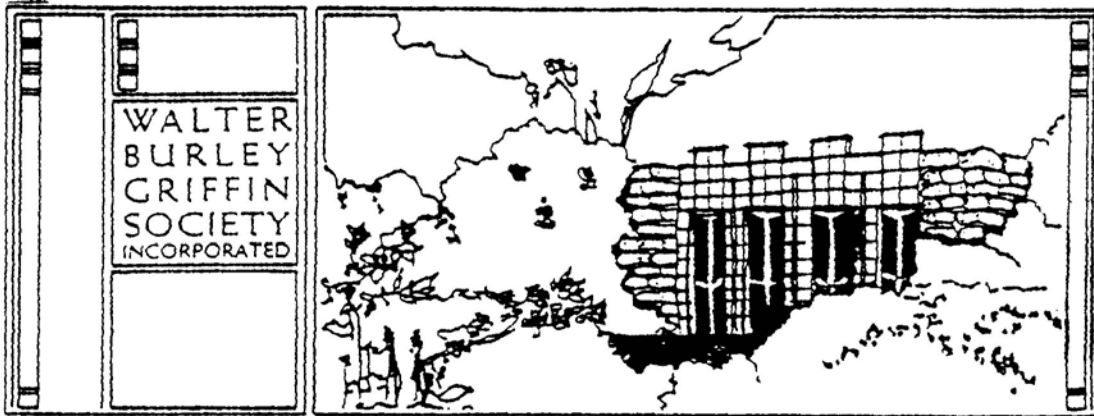
Activities

The Society has several hundred members from various parts of Australia and USA. In 2004 the Society set up the Canberra Chapter and currently has plans for a Melbourne Chapter. The Society was the inspiration for the founding of the Walter Burley Griffin Society of America Inc in 1998 and since then has established a good working relationship with its sister organisation.

The Society produces a newsletter at least twice a year and organises lectures, symposia, guided walks, tours and open house days, and is active in many spheres of environmental and heritage conservation throughout Australia. The Society's activities, particularly the symposia and lectures, focus on various aspects of the Griffins' work in Australia and internationally. Since 1988, the work of the Society has been recognised by the awarding of four government grants and two National Trust of Australia Heritage Awards.

For further details, see the Society's website:
<http://www.griffinsociety.org>

ATTACHMENT A



STATEMENT
FOR MEMBERS OF THE PARLIAMENTARY JOINT STANDING COMMITTEE
ON THE NATIONAL CAPITAL & EXTERNAL TERRITORIES

**Roundtable Public Hearing
Griffin Legacy Amendments 56, 59, 60 and 61 to the National Capital Plan**

**Parliament House, Canberra
23 February 2007**

Executive Summary

The 'Griffin Legacy' Amendments to the National Capital Plan propose the most significant, far-reaching and irreversible changes to Central Canberra since the creation of Lake Burley Griffin and associated works by the NCDP in the early 1960s.

These changes are based on the premise that Canberra lacks an 'urban' quality in terms of the vitality, diversity, intensity of everyday life; the integration of public activities and public institutions; and the creation of high density urban districts.

The analysis presented in this review concludes that the NCA proposals are based on an unacceptable, cavalier approach to the principles of sustainable city planning, city building and community consultation. The Walter Burley Griffin Society is concerned that Griffin's name has been used to advance a mediocre outcome that will compromise Canberra forever.

Amendment 56: The Griffin Legacy - Principles and Policies

The Griffin Legacy is a 2004 NCA publication, which undertook historical analysis of Griffin's plan and advanced a series of propositions and strategic initiatives that claim to extend the relevance of Griffin's ideas. The latter are essentially a series of 'City Beautiful' artist's impressions.

The transition from *The Griffin Legacy* to the Griffin Legacy Amendments to the National Capital Plan has occurred without the preparation of an adequate 'Implementation Plan' that addresses a wide range of core issues in terms of sustainability and environmental

ATTACHMENT A

impacts, heritage issues, traffic and transport implications, the land use reality of the scheme, demographic implications, market viability, the cost and funding of the proposals, the pattern of land ownership, economic viability, timing, phasing etc. The major changes entailed in the Amendments are unsupported by planning data and statistical information of any kind.

The Amendments are also unsupported by a Development Control Plan and site controls with any statutory force.

These shortcomings make a mockery of the claim that the Griffin Legacy Amendments are based on 'Principles and Policies' derived from the work of Walter Burley Griffin.

Canberra is a living city facing complex environmental, social and economic challenges, which demand an alternative vision to the low-density, car-based city created by the NCDC. At the same time, the landscape character of the city must be conserved in its ecological, aesthetic and cultural dimensions. Reconciling these imperatives requires more than a selective reading of Griffin's ideas to justify property development, it requires a commitment to social, environmental and economic sustainability.

Amendment 59: City Hill Precinct

This Amendment sets out principles, policies and land uses, together with schematic Master Plan provisions, to guide redevelopment of City Hill in accordance with general statements by the NCA and objectives determined by the Canberra Central Taskforce (CCT). It incorporates statements and objectives that are in conflict.

The City Hill Precinct has been seen from these different perspectives as three different types of heart – commercial, symbolic, municipal. In November 2005, the CCT evaluated the push to make the City Hill Precinct the pre-eminent commercial heart of Metropolitan Canberra. However, the CCT financial analysis revealed that the numbers don't work – the costs of development would not be covered by revenue.

The City Hill Precinct makes no sense as the commercial heart of Canberra, as the CCT financial analysis makes clear. Nor was this outcome ever Griffin's intention – he always saw this site as the Civic Centre.

In summary, there is no commercial, economic, heritage or amenity justification for proposing that City Hill be turned into Canberra's pre-eminent commercial heart with a mass of intrusive buildings. Instead, this part of Canberra should maintain the civic role Griffin intended as the symbolic and municipal heart of the city.

The crown of City Hill should remain green open space and continue in its role as the green landmark element in the larger landscape, preserving the landscape vistas to and from City Hill Park.

All that is needed at City Hill is the correct siting and design of a new and permanent building for the ACT Legislative Assembly. Planning for City Hill must return to the Griffin principle of a clear distinction between Federal and Municipal government, with the Assembly Building the terminating element of Constitution Avenue – Griffin's Municipal Axis – sited in strong relationship to Parliament House and the everyday life of the city centre; and located on a civic square of real human interest and human scale.

ATTACHMENT A

Amendment 60: Constitution Avenue

Amendment 60 proposes a scale of development along Constitution Avenue that will impact on the aesthetic and historic significance of the Lake, the Central Canberra Parklands and the vistas from Parliament House. Amendment 60 has been put forward without reference to the heritage values of Lake Burley Griffin, the Central Parklands and views from Parliamentary House and the Parliamentary Triangle. This is unacceptable planning practice by any standard.

The proposal is based on development of the extensive tract of land between Parkes Way and Constitution Avenue, within the area Griffin planned as Public Gardens. This was to be 'the place of the people,' – the 'central park' of the city and the site for national cultural institutions. It is therefore a radical departure from the Griffin Plan, and should not be advanced in Griffin's name, or claimed to be part of the 'Griffin Legacy' in any way.

Under the Amendment, Parkes Way will be downgraded from a motorway to a 'boulevard addressed with prestigious buildings', but it will remain a car-dominated space, with no active frontages and no human scale. The Amendment will introduce a new grid of local streets, major new grade-separated intersections at Commonwealth Avenue and Kings Avenue; removal of the Commonwealth Avenue cloverleaf and, presumably, major upgrade to the urban arterials through North Canberra. It promises the worst of both worlds – an urban arterial engineered as a city street, working as neither.

The Society contends that either Parkes Way should be abolished to establish the great park and cultural institutions Griffin intended or it should be reconstructed as 'Capital Terrace', thereby establishing the base of the National Triangle as an active, vibrant people space.

If implemented in its present form Amendment 60 will cause serious damage to the landscape of Central Canberra by proposing a wall of new buildings, 8-storeys high, along Constitution Avenue and Parkes Way, rising above the tree canopy of the 'Bush Capital'. The most effective way to overcome the negative impact of Amendment 60 on the visual quality of Canberra will be to limit the height of the proposed building wall to 4 storeys (16 m) along the full length of Parkes Way and Constitution Avenue.

Amendment 61: West Basin

Amendment 61 proposes extensive engineering works and intensive waterfront development on land reclaimed from the West Basin of Lake Burley Griffin. The scale of development on the West Basin foreshore will impact on the aesthetic and historic significance of the Lake and significant views from Parliament House.

As with Amendment 60, this proposal has been put forward without reference to the heritage values of Lake Burley Griffin and the views from Parliament House. Again, this is unacceptable planning practice.

The Walter Burley Griffin Society does not support the scale of the proposal and rejects the proposition that this foreshore reclamation can be justified because it replicates the circular geometry of Griffin's scheme for West Basin. To carry out a fragment of the Griffin Plan on the city side of West Basin is no more than a self-serving appropriation of Griffin's design language to create more property development opportunities.

ATTACHMENT A

The Society notes with concern that the NCA scheme for West Basin has grown significantly in scale, intensity and extent of intrusion on the waterfront between the release of the 2004 *Griffin Legacy* study in 2004 and the preparation of Amendment 61 in 2006. Underpinning the manipulation of imagery in the NCA promotional material, there is a serious and unacceptable planning move to introduce large-scale commercial structures at the very water's edge..

The foreshore is not protected by a continuous zone of 'open space/waterfront promenade' permitting construction of a large convention centre and associated hotel on the foreshore of the Acton peninsula. In terms of 'Griffin Legacy' planning principles, a hotel/convention centre in this location at Acton does not activate the city with a vibrant mix of uses, but perpetuates the Canberra syndrome of isolated buildings in the landscape, located hundreds of metres from anything else.

One of the clearest, most consistent principles of Walter Burley Griffin's life and work was his commitment to continuous public access to the foreshore. This was a distinguishing characteristic of the Canberra Plan and the Castlecrag venture. The foreshore of Lake Burley Griffin must be protected by a continuous zone of open space.

The key to achieving this outcome is to zone the foreshore 'Open Space/Waterfront Promenade' all the way around West Basin. This requires removing the convention centre/hotel proposal from contention and returning this section of the West Basin scheme to the 'green' condition shown in the 2004 NCA *Griffin Legacy* document. The West Basin scheme also needs installation of the foreshore promenade before any land release - complete with the full five rows of avenue trees indicated in Amendment 61.

The proposal for 2-storey pavilions on the lake side of the waterfront promenade is most undesirable - as any heritage assessment of the lake would establish. Eight storey buildings (16 m) are also permitted immediately behind the buildings facing the promenade, and along Commonwealth Avenue, with the possibility of buildings up to 25 m, or indeed 'above 25 m'. The effect of a gaggle of buildings crowding the landscape of the Central National Area can already be seen with the recent tower developments in the Civic West precinct.

The proposals incorporated into Amendments 60 and 61 need to be understood in the context of a small city with a current population of 320,000, a declining growth rate for the past 15 years and an estimated population of 480,000 - at best - by 2033 and most likely 380,000.

Given the demographic profile and character of Canberra, the city should take the low-rise high density route, limit the height of continuous urban fabric to no more than 4-storeys, and maintain the human scale, solar access and 'garden city' attributes of a beautiful, distinctive place set within the canopy of one of the most magnificent urban forests in the world.

The Public Consultation Process

At this defining moment in the history of Canberra Amendments 56, 59, 60 and 61 to the National Capital Plan have been approved by the Minister for Local Government, Territories & Roads - yet they are demonstrably inadequate and unacceptable as a planning and design proposal for the city, and as a response to the historical component of the 2004 *Griffin Legacy* study. The process by which Ministerial approval was granted prior to review by the Joint Standing Committee on the National Capital & External Territories calls into question the adequacy of the public consultation process.

ATTACHMENT A

The manner in which public consultation was conducted by the NCA requires substantial amendment. While public comment was invited in August 2006 and some 350 written submissions were received, the NCA then invoked the *Privacy Act* on the basis that submissions had been called without the option of a privacy waiver. As a consequence, the original written submissions were not available for public review and the authors of the submissions were not identified.

The NCA asserted that the responses were overwhelmingly favourable and a senior officer stated: 'the conflicts that have been identified have been of a remarkably trivial nature'. The Walter Burley Griffin Society contends that nothing could be further from the truth.

We submit that the public consultation provisions of the Commonwealth *Australian Capital Territory (Planning and Land Management) Act 1988* and the ACT *Land (Planning & Environment) Act 1991* should be standardised to establish the same procedures throughout the Australian Capital Territory, based on transparency and the public interest.

Conclusion

The scale and complexity of the changes to the symbolic centre of Canberra proposed by the National Capital Authority, and the cavalier manner with which they have been advanced, must be a matter of grave concern to all Australians

The Walter Burley Griffin Society calls for Amendments 56, 59, 60 & 61 to the National Capital Plan to be withdrawn and reworked to substantially reduce the scale of proposed development and to establish a rigorous planning basis for the scheme. At the very least, this should include an Implementation Plan and Development Control Plan, demonstrating full consideration of environmental impact, heritage impact, traffic engineering, demographic profile, market viability, land ownership, timing, phasing etc.; full resolution of the statutory controls needed to guarantee design quality in the Central National Area; and clear sustainability criteria to evaluate proposals over time.

Anything less will indeed compromise Canberra forever.

22 February 2007

The main Statement to the Joint Standing Committee on the National Capital & External Territories was prepared by Professor James Weirick, President of the Walter Burley Griffin Society Inc., in association with Brett Odgers, Chairman of the Canberra Chapter, Walter Burley Griffin Society Inc. and other members of the Society.

This Executive Summary was prepared by Society member, Bob McKillop.

ATTACHMENT A

Further information:

Professor James Weirick
Director, Urban Development & Design Program
Faculty of the Built Environment
University of New South Wales
Sydney, NSW 2052

T: (+61 2) 9 385 5733
F: (+61 2) 9 385 4507
email: j.weirick@unsw.edu.au

Brett Odgers
Chairman, Canberra Chapter
Walter Burley Griffin Society Inc
email: bjodgers@iinet.com.au

Kerry McKillop
Secretary,
Walter Burley Griffin Society Inc
email: kerrymckillop@bigpond.com