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AUSTRALIA (AUSTRALIAN  
CAPITAL TERRITORY)

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Mr Andrew Smith  
Chief Planner  
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cc

- Members of the ACT Legislative Assembly
- Residential Associations & Community Councils
- Deputy Director General EPSDD
- ACT Commissioner for the Environment
- ACT Government Architect
- ACT Heritage Council
- Ms Gai Brodtmann MP

## **NATIONAL CAPITAL PLAN DRAFT AMENDMENT 91 – CITY AND GATEWAY URBAN DESIGN PROVISIONS**

Dear Mr Smith

We refer to our recent meeting about the Draft Amendment and welcome the opportunity to provide comment.

The National Trust of Australia (ACT) is a not for profit community organisation with over 1,300 members and is widely respected in the community. The Trust's role is to foster public knowledge about places and objects that are significant to our heritage, and promote their conservation.

The Trust is supportive of properly considered high quality development. While we support the overall intent of the draft amendment we suggest tightening up of the language, restructuring the content, including clear statements of objectives for each of the detailed conditions (p11 onwards), and adding provisions that clarify certain aspects of these rules. Public art and play space within new developments and redevelopments should also be encouraged.

### **Garden City is more than a Bush Capital**

At the same time we strongly believe it essential that urban design provisions are accompanied by and balanced with clear and consistent quality objectives, stringent planning controls that reward merit and reject mediocrity, and regulatory practices and enforcement that protect and enhance Canberra's unique sense of place, in order to maintain its standing as an internationally recognised work of cultural significance that reflects and embodies the values of this nation.

The Framework notes that the Sydney and Melbourne Buildings and Haig Park are listed on the Heritage Register. It asserts “*The design of our buildings today is fundamentally important, as they will be our future heritage*”. There are various references to the symbolic and functional significance of Canberra as the Nation’s Capital and the significance of views to the city’s surrounding hills. However, there is no clear commitment to ensuring that what is considered significant will be properly protected and promoted.

Both the National Capital Authority and the ACT Government have considerable responsibilities for management of the Heritage considerations of the Framework. The Framework must fully reflect the respective governments’ roles and responsibilities in accordance with *Heritage Act 2004* (ACT) and *the Environment Protection and Biodiversity Conservation Act 1999*.

Unfortunately, we feel this is problematic because the ACT Government does not have a Heritage policy or a Heritage Strategy and the Commonwealth Government itself seems uncommitted to the national and local heritage interests involved in ongoing development of the National Capital.

Unfortunately, the current Framework document is bereft of any meaningful consideration of either Heritage or the concept of a Garden City and how that relates to and has come to be interchangeable with its Bush Capital title (originally a pejorative that has gradually been fondly embraced):

- Heritage, which is a major part of Canberra’s identity and imbues this place with layers of meaning and links to its past, helps tell the story of the national capital but is not properly addressed in the Framework and is being steadily subjected to “death by a thousand cuts”; and
- the Garden City and its shorthand Bush Capital title, which combine to produce a unique way of thinking about landscape and how urban form can positively respond to develop safe liveable communities in harmony with nature, fostering good health outcomes, in a well-planned environment.

The Draft Amendment appears to give the ACT Government a blank cheque to produce successive draft variations for the inner North that directly affect an estimated 55,000 existing residents and a multiplicity of businesses and community organisations (most of whom are unfamiliar with either document’s contents and implications).

## **AREA COVERED**

The Framework purports to cover an area up to 1km east and west of Northbourne Avenue and the Federal Highway, and estimates a population increase of 17,150 (32%) by 2031. However, the outline of the Study Area is irregular and was expanded following the draft in March, to now take in the whole of Watson and part of the Majura nature reserve.

The scale of transformation envisaged along Northbourne plus the Federal Highway is massive. Altering the definition of ‘corridor’ to subsume large parts of suburbs (and portions of nature reserve) on either side is concerning as it appears to be taking precedence over the Garden City concept, ignoring the network of transport corridors in place already, and adopting a crude technique for targeting areas where higher densities and redevelopment will be encouraged. In doing so the Framework fails to take into account practical walking distances to transit nodes, social infrastructure needs, or the residential amenity that currently exists and that those communities rightly value.

Urbanisation within the Study Area occurred during the 1920s – 1960s and comprises a cluster of early Griffin and post-war garden city suburbs, separated by a functional network of transport corridors. The integrity of those suburbs in terms of heritage requires sensitive planning and development to respect the key features, such as open space layout, community facility focus, streetscape quality, high levels of tree canopy and vegetation, views to hills and ridges, and low traffic volumes.

## **LOCAL HERITAGE**

Local cultural heritage is important within each suburb, and for this whole area. It's important that it be identified, protected, shared and celebrated. The rate of evolution for heritage places is often slow, because community understanding, awareness and appreciation of heritage grows over time. The area contains notable buildings, schools, churches, memorials and parks and gardens that are increasingly significant to the local community for their individual and collective social and cultural values.

Last month Lyneham High School celebrated its 60th anniversary with an assembly, open day, tours and sausage sizzle, and both the Hackett and Downer Community Associations have released books celebrating their first 50 years. Dickson marks its 61<sup>st</sup> year (Dickson Library turns 50 this December), Downer's renovated local shops are undergoing a renaissance (the 1940 farm buildings at the core of the original CSIRO Experiment Station), and Ainslie's shops are now 70 years old. New research and community awareness are enriching the sense of place in these post-war garden city suburbs.

Heritage Overlay and Audit In other jurisdictions, planning policy requires local government to identify and protect local heritage. Places important to a local community are identified within the local planning scheme and protected through a Heritage Overlay. A similar policy and practice should be adopted as part of any precinct codes. As a first step an audit of places, buildings etc should be undertaken and be endorsed by the Framework.

Interpretative Signage The Framework should also ensure that interpretive signage is used to record and promote the history, and natural and cultural landscape of an area. This measure would be welcome and the Trust would appreciate the opportunity to be involved in the development of content.

For example, the Old Canberra Inn is one of the earliest licensed pubs in the region and pre-dates the city itself. The original slab hut was built in 1857 by Joseph Shumack and in 1876 was licensed as an inn and was a coach stop on the Yass to Queanbeyan run until 1887. Canberra's first airfield was established in March 1924 at Northbourne Aviation Ground, which lay between Dickson Library and the western playing fields of today's Dickson College, covering much of what are now suburban streets north of Majura Avenue and east of Cowper St.

National Heritage List Both Governments would be aware that an emergency nomination of Lake Burley Griffin and the Lakeshore Landscape to the Commonwealth Heritage List has been lodged with the Minister for the Environment and Energy. Any new development should be undertaken with a view to minimising impacts to and promote the identified Commonwealth Heritage values of the Lake and surrounds.

## **Sustainable Development**

We acknowledge the Government's intention to encourage sustainable development but we note that sustainability is focused on new construction. We believe that the Government must also consider the embodied energy in existing buildings around the city and actively encourage sensitive adaptive reuse options wherever possible. By its nature, new

development is not necessarily sustainable and efforts should be made to prioritise development options that will result in a reduced environmental impact in the long term.

Open Space Open space, with a high proportion of natural bushland and landscaped tree cover, are key elements of Canberra's urban design and one of the dramatic ways that it presents differently from any other city. The combined effects of population growth, mainly living in apartments, and climate change mean that public open space must be safeguarded effectively and incorporated into redevelopments and infill projects.

The Framework does not adequately address the immediate or long term demands for both active and passive sport and recreation space, and the draft amendment presages the loss of almost 8 hectares of open space at Southwell Park. The catchment for the recreation facilities at Southwell Park and Yowani takes in most of Canberra. Many people from other parts of Canberra and the region use these facilities both after work and on weekends. Many national events are also held here.

Southwell Park is a desirable element in the garden city and should be retained in its entirety. Views across Southwell Park to Black Mountain, O'Connor Ridge and the heritage-listed St Ninians Church are attractive and should be retained. Landscape upgrades and urban design provisions that address the interface with the main avenue and approach route and reduce the visibility of unsightly surface parking and minimise the risk of big box structures would be desirable.

### **Building Heights**

The intersection of Northbourne with Wakefield and Macarthur Avenues, is where Northbourne meets the two strong diagonal axes and vistas that are intrinsic to the Griffin Plan. The primary visual connection between Black Mountain and Mt Majura would be permanently interrupted if towers to RL617 are approved in this location, as they would mask and block the views along those axes. The rationale for locating much higher buildings at this particular junction (that there is a compelling need to articulate the 25m cap that cannot be met at a different junction) is in our view weak. A reduction in height could still deliver that, and there are logical alternatives where increased height could be appropriate, such as at the junction of Barry Drive/Cooyong Street, where the city centre commences, or at Mouat/Antill Streets.

It is unfortunate but true that there is currently little community confidence in the quality of design and construction of new apartment buildings in Canberra. We believe the Government should undertake measures to increase confidence through improved regulations, sustainability incentives, the introduction of design competitions, and genuine and ongoing community consultation, both with organisations and individual residents.

We would also recommend reviewing the maximum building height and considering changes for:

- the Kamberra site, at the corner of Flemington Rd and the Federal Highway, as it occupies a key corner and focal point where the light rail changes direction and the visual impact of somewhat higher buildings and a corner marker would be positive;
- Step backs that enable uppermost floor levels to incorporate significantly deeper balconies and potential raised communal open spaces that overlook Northbourne and capture distant views to the Brindabellas and mountain ranges to the south.

From our perspective this initial round of consultation suggests that further consultation is justified, in order to better canvass and explore the full range of issues, stimulate discussion, and consolidate the vision in the National Capital Plan.

Yours sincerely

A handwritten signature in cursive script that reads "Gary Kent". The signature is written in black ink on a light-colored background.

Gary Kent  
President  
4 March 2019