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GPO Box 373
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Re: **The National Capital Plan**
Draft Amendment 56, Principles and Policies
Draft Amendment 59, City Hill Precinct
Draft Amendment 60, Constitution Avenue
Draft Amendment 61, West Basin

In response to your invitation for public comment on the current stage of implementation of *The Griffin Legacy: Canberra the Nation's Capital In the 21st Century*, the Walter Burley Griffin Society Inc makes the following submission. We address the Strategic Vision of the initiative and also make specific comments on the draft amendments to the National Capital Plan.

The Strategic Vision

The Society compliments the National Capital Authority for initiating the *Griffin Legacy* project and endorses its general aims, while recognising that the key proposition – extensive urban infill of the largely undeveloped 'Commonwealth estate' within the Central National Area – is a high risk, irreversible step, which could go seriously wrong.

The 2004 *Griffin Legacy* report brought together an impressive collection of documents to provide an informative analysis of Griffin's design principles and an assessment of their relevance to Canberra in the 21st Century. As detailed in the Introduction on page 2, the *Griffin Legacy* study was undertaken 'to protect the integrity of the Griffin Plan, recognizing its stature as a work of both national and international significance.' This endorsement of Griffin's achievement is welcomed. At the same time, the *Griffin Legacy* project is a major real estate development, involving subdivision of the immensely valuable public lands at the centre of Canberra, and the sale of their land use rights. The WBG Society is concerned that this unique opportunity in the history of the nation's capital is not squandered, and Griffin's name is not used to justify a mediocre outcome.

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* project seeks to overcome the 'suburban' character of Canberra by building new, street-defining urban precincts in the centre of the city. This has been attempted in the past – for example, around Civic, Northbourne Avenue, Barry Drive. The results do not inspire confidence. Nor do the built works at Kingston Foreshore. If the *Griffin Legacy* project is to proceed, it must achieve an unparalleled level of planning and design excellence – unparalleled in Canberra. Indeed, unparalleled in Australia.

Given that *The Griffin Legacy* purports to provide a 'Strategic Vision' that ensures the nation's capital in the 21st century realises its potential and can accommodate the

best of contemporary urban design (2004 report, p. vii), it is surprising that the document lacks an analysis of the factors that undermined the realisation of Griffin's vision in the 20th century and the core themes that make the vision more relevant in the 21st century.

As noted in several locations, the Griffin design was for a much more compact city in which movement of people would primarily be by a public transit system (city railway and electric trams). Cheap energy and the individualism made possible by the private motorcar during the 20th century were the dominant forces that created a very different Canberra to that envisaged by Griffin. The 21st century has brought recognition that this city form and energy use is not sustainable; indeed Peter Newman and Jeff Kenworthy developed proposals for a more sustainable Canberra some 20 years ago. Increasingly, Australians have begun to appreciate that cities need to become more sustainable by integrating the environment into all aspects of life and all aspects of government. By its very nature the concept of sustainability integrates environmental, economic and social factors into one (not balancing them off against each other) and must therefore be integrative, as Griffin anticipated almost a century ago, with his transport network for Canberra and associated proposals for water recycling, urban horticulture, forest preserves, indigenous plantings etc; and at Castlecrag, with his open space system, bushland preservation, foreshore protection, climate-responsive architecture, and together with Marion Mahony Griffin, active commitment to community life.

In this context, the Griffin vision for Canberra has increased relevance. In particular, enhanced sustainability provides a core measure of the relevance of the 21st century opportunities identified in *The Griffin Legacy* for each element of the city (2004 report, pp.113-145). From the document, it is not always apparent which planning principles have been applied in arriving at the 'Propositions' outlined in the final section of *The Griffin Legacy*. We submit that to effectively embrace Griffin's principles, future initiatives must demonstrate:

- Significant improvements in the sustainability of the built environment, the movement of people and goods, and open space;
- Subservience of all built forms to the larger landscape;
- Continuing commitment to the public domain, in particular, preservation of the continuous public foreshore around Lake Burley Griffin;
- Effective public participation and 'community building' as an integral part of the planning and development process of the Central National Area.

The Walter Burley Griffin Society acknowledges that the *Griffin Legacy* study has been a significant re-examination of the Griffin Plan and as a 'City Beautiful' exercise, has been as important as the McMillan Commission's re-evaluation of the L'Enfant plan for Washington, DC in 1902. However, Canberra is more than a 'City Beautiful' plan, 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 a selective reading of Griffin's legacy, it requires a commitment to social and environmental sustainability.

The following comments on the draft amendments to the National Capital Plan are presented in the context of the above core principles.

Draft Amendment 56, Principles and Policies

Draft Amendment 56 to the National Capital Plan 'proposes to include "The Griffin Legacy – Principles and Policies" to form the basis for making planning and urban design decisions for the central national area, its landscape setting and approaches.' This is a very significant amendment and it needs to be framed in a way that will best ensure high quality outcomes.

Draft Amendment 56 contains reinterpretation of Griffin's design for Canberra, and proposes more intensive urban development. The Society acknowledges this and supports the overall direction. We believe, however, that Draft Amendment 56 needs to be further elaborated and supplemented as follows:

- On page 3, Section 1.1.3 Griffin Legacy Propositions, add the underlined words to the second proposition "Build on the Griffin Legacy" – "Affirm the Griffin Plan as the enduring framework for the city as it evolves into the 21st century and recognise the sustainable development principles contained within the Plan as the core criteria for evaluating future growth and change."
- On page 7, add the underlined words to Item 2(a), "maintaining the Griffin Plan as the primary organising framework of the city's urban form, landscape and symbolism and recognising the sustainable development principles contained within the Plan as the core criteria for evaluating future growth and change."
- On page 9, Items 5(a) to 5(d) need to refer to the fundamental Griffin principle of retention of public access to continuous foreshore at all times.
- Item 6(c) should also incorporate cycling and walking as elements of a sustainable 'people movement' system.
- Item 6(e) should be worded so as to encompass the provision of clear consistent design guidelines that establish an absolute height limit, active street frontages, resolved proportions, a horizontality in expression, restrained palette of colours, and understated design elements.
- Item 6(g) needs to refer to "a quality architectural character" as well as "a quality landscape character".

The heritage assessments being prepared for the lake foreshore and the Parliament House vistas are crucial documents and no work should proceed with the *Griffin Legacy* proposals until these assessments have been released for public comment, approved, and formally incorporated in the National Capital Plan. Assessment of responses to the Draft Amendments 56, 59, 60, 61, and their finalisation should not proceed until the heritage assessments are adopted. In the Society's view, the current process, which relegates the heritage assessments to a minor supplementary role, is indefensible and calls into question the whole *Griffin Legacy* initiative.

Draft Amendment 59, City Hill Precinct

This draft amendment sets out a framework of land uses, planning and urban design policies to guide the future development of the City Hill Precinct. The intention is to develop City Hill as the 'heart of the city'. It is proposed that the under-used space of a car-dominated city, characterised by soul-less surface car parks and complex roads and intersections, will give way to a more people-orientated and vibrant cityscape.

The Society seriously questions whether Vernon Circle can become a successful 'people space'. We note that the social sustainability aspects of the scheme are

complemented by a broad commitment to environmental sustainability. However, the Society is concerned that the key component of the Draft Amendment – the re-routing of metropolitan traffic from Vernon Circle to London Circuit – is dependent upon extensive roadworks across the ACT (Appendix T.7 Traffic, p.21), and increasing the width of London Circuit (apart from the stretch adjacent to the retained North and South Buildings, Civic Square as shown in Appendix T.7 Indicative Cross Sections, p.26) This highlights the need for a clear, effective set of ESD criteria to evaluate the comparative benefits of planning initiatives throughout Canberra. In short, the ‘traffic calming’ of City Hill may not be worth the environmental cost of ‘more roads’ in the rest of the ACT, and the conversion of London Circuit to a major urban arterial.

Canberra conspicuously lacks a heart at the moment, apart from the privatised space of the Canberra Mall. However, City Hill should not fulfil this function.

The WBG 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.

This visual and symbolic role for City Hill Park is sufficient, without the extensive restructuring 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. We do not support modification of the topography ‘to create an urban park, accommodate pedestrian desire lines, and integrate with Vernon Circle.’ (Appendix T.7 City Hill as a Central Open Space, p.27)

We further state that consideration of the Draft Amendment should not proceed until two all-important issues are resolved:

- the heritage value of the landscape vistas to (and from) City Hill Park. In particular, the view from Parliament House to the green crowned hill at Civic should 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. Constitution Avenue also needs to retain its significance as the base of the National Triangle by meeting Commonwealth Avenue at a clearly defined apex.
- the site, physical extent and character of the ACT Legislative Assembly. The meeting place of the Legislative Assembly is the most important functional and symbolic activity on City Hill. 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. Planning for City Hill must return to the Griffin principle of a clear distinction between federal and municipal government. If a high quality municipal precinct is to be achieved in this location, the Legislative Assembly must be sited in a 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.

We are also concerned that the Draft Amendment would permit additional tall landmark buildings (14-18 storeys) at the intersections of the main avenues and London Circuit. Although precedents have been established for such buildings in the city centre, they are not precedents worthy of emulation as works of architecture or as urban design gestures. The Society opposes the location of visually dominant structures in the vicinity of City Hill, and wishes to emphasise that Griffin explicitly called for horizontal development in Canberra.

Another significant concern is the apparent acceptance of a policy of continued construction of large car parks for unhindered access to the city centre by private cars (Appendix T.7 Parking, p.21). This contradicts statements elsewhere, which support the development of sustainable public transport for Canberra. In this context, the Draft Amendment remains silent on the pricing strategies that would facilitate the adoption of more sustainable transport outcomes.

Draft Amendment 60, Constitution Avenue

The WBG Society is deeply concerned that planning for this precinct has reached Draft Amendment stage while the studies assessing the heritage values of the Lake setting and the Parliamentary vista are still in train.

Large-scale development along Constitution Avenue would necessarily impact on the aesthetic and historic significance of these key landscape elements of the National Capital.

The proposal is based on development of the extensive tract of land between Parkes Way and Constitution Avenue, within the area Griffin proposed as the great 'central park' of the city and the site for national cultural institutions (the National Theatre, National Opera House etc). Development of this stretch of open land as a commercial/residential precinct would be a radical departure from the Griffin Plan, and should not be advanced in Griffin's name.

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.

The development proposed in the Draft Amendment must be seen as an initiative of the NCA, which will 'set in concrete' the bad decision of the NDC to put a motorway through the middle of Griffin's most important urban park.

Given the radical and provocative nature of the NCA proposal, the WBG Society is concerned by the lack of planning and urban design resolution of the scheme. The proposal to construct such an extensive tract of commercial/residential development is not supported by any details of the gross floor area of the scheme and the size of the future residential population. 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.

As an urban design proposition, the scheme does not address the interface of the new development with Parkes Way and the lakeside parklands. We note that Parkes Way is intended to become a 'mixed-use boulevard' (Section 1.1.3, p.3) but there are no concrete proposals to achieve this outcome, and Parkes Way is not shown as an 'active frontage' street (Appendix T.8, p.25). We are also concerned that the

proposal means 'more roads' for Canberra – doubling the existing width of Constitution Avenue, and providing 'local street' slip lanes along Parkes Way (Appendix T.8, p.22). There is no overall cross-section to demonstrate the impact of these proposals, which seem excessive and counter-productive in terms of human scale and urban vitality. In general, there is a grave risk that the downgrading of the 'motorway' condition of Parkes Way and its connections to Commonwealth Avenue, will achieve the worst of both worlds – an urban arterial engineered as a city street, working as neither.

We are also most concerned that there are no overall massing and height diagrams to show the effect of a new zone of commercial development along the base of the National Triangle. There is a need for sectional elevations to accurately indicate the scale, height and rhythm of this new wall of buildings along Constitution Avenue and Parkes Way, and to 'test' the proposition that the proposed 25m height limit can vary up to the 617m limit (Appendix T.8, p.26). There is also a need for perspective studies from ground-level vantage points on the southern side of the Lake, together with views from the lookouts on Mount Ainslie and Black Mountain, to communicate the effect in the larger landscape of a wall of new construction, approximately double the height of the Portal Buildings, rising above the tree canopy of the 'Bush Capital.'

Instead of the existing sweep of green canopy, there would be an urban edge and wall of buildings on Parkes Way, eight storeys in height. We note with concern that the 'Parliament House Vista' is only proclaimed to the south side of Parkes Way (diagram in Section 1.1.2, p.3), when clearly a new wall of buildings on the north side of Parkes Way would form the dominant urban edge to this vista. The Draft Amendment 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 within the wall of buildings would 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. The Walter Burley Griffin Society is concerned that the Draft Amendment does not address this issue in any way.

Draft Amendment 61, West Basin

Again, we are concerned that this scheme has been proposed before the heritage values of Lake Burley Griffin and the Parliament House Vista have been identified, and adopted.

The WBG Society does not support the scale of the proposal to extend the city to Lake Burley Griffin in this Precinct, and create a commercial waterfront development in the Central National Area.

As is evident in the original plans reproduced in *The Griffin Legacy*, 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. No version of the Griffin Plan shows continuous urban development extending to the foreshore of West Basin.

The Draft Amendment proposes a land bridge over the Parkes Way/Tuggeranong Freeway to extend 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.

We reject the argument that this foreshore reclamation can be justified because it replicates the circular geometry of Griffin's scheme for West Basin. 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.

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. 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.

Reclamation of the foreshore in this location would not 'realise key elements of the geometry and intent of the Griffin Plan at West Basin,' but rather establish a dangerous precedent for urban encroachment on Canberra's greatest asset, Lake Burley Griffin.

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.

In our view, the 8-storey scale of the proposed development is also flawed. The 8-storey limit is higher and bulkier than the 6-storey limit adopted for the reconstruction of Berlin in the 1990s. The effect of entire urban precincts built to the 6-storey standard can be experienced in Berlin today – it is oppressive, totally lacking in human scale, dominated by gloomy street canyons. To make 8 storeys the standard for block after block of continuous urban fabric in Canberra is a misguided interpretation of European city principles. In the Australian context and the Australian climate, the maintenance of human scale, solar access and an appropriate relationship to the tree canopy of the city must limit the height of continuous urban fabric to no more than 4-storeys.

Restriction of urban development in the West Basin Precinct to a wide promenade setback from the existing foreshore line and a maximum height of 4-storeys will serve to animate this part of the city. However, the proposal to push a 'Darling Harbour'-style development to the water's edge in the 'Land Use C' zone is totally unacceptable. The foreshore must be a continuous zone of open space, planted with a continuous avenue of tall indigenous trees to provide a filigree screen to the development in harmony with the Black Mountain backdrop.

In further application of the Griffin ethos that buildings must be subordinate to the landscape, the proposed development of four city blocks along the west side of Commonwealth Avenue is inappropriate. In this area, Griffin proposed three blocks in his 1918 Plan and two blocks in his 1913 Plan. The guiding principle, in determining the scale of development along the city's most important urban boulevard, must be maintenance of the unequalled lake vistas to the west, which lift to exhilarating views of the Brindabella Ranges.

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 the Draft Amendment ('Proposed Fig.11', p.15).
- 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.
- 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 (*pace* Kingston Foreshore development).
- 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).

Conclusion

In summary, the proposed Draft Amendments to the National Capital Plan are inadequate and unacceptable as a planning and design response to the promise of the 2004 *Griffin Legacy* study.

In the Society's view, this is because the National Capital Authority has followed a thoroughly flawed process.

No work on these proposals should have begun until (1) the heritage values of Lake Burley Griffin and the Parliament House Vista had been determined; and (2) the sustainable development principles contained within the Griffin Plan had been adopted as the core criteria for evaluating future growth and change in Canberra's Central National Area.

At this stage, we recommend that the Draft Amendments be put aside until these key preparatory steps have been completed.

The Draft Amendments should not be issued again for public comment until the manifest flaws in the existing proposals are addressed:

- Draft Amendment 59, City Hill Precinct – determination of the scale, siting and character of the ACT Legislative Assembly Building, and the development of public open space in association with this scheme as the 'heart of Canberra', not City Hill Park.

- Draft Amendment 60, Constitution Avenue – resolution of the interface of the proposed development with Parkes Way and the lakeshore parklands and completion of convincing urban design studies of the effect of the proposed building wall along the base of the National Triangle, and its implementation over time.
- Draft Amendment 61, West Basin – reduction in the scale of the proposed development to fit within the existing foreshore line of West Basin and to ensure that the scheme conforms to the Griffin principle of buildings being subordinate to landscape.

Supporting technical studies addressing transport, traffic, infrastructure, water management, landscape character, social needs, implementation etc must also be released for public comment.

The Walter Burley Griffin Society is concerned that the immensely significant spaces of central Canberra are at risk of succumbing to mediocre urban development, and that this should happen in Griffin's name. Under no circumstances should Draft Amendments 59, 60 & 61 to the National Capital Plan proceed in their current form.

Yours sincerely,

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Secretary
Walter Burley Griffin Society Inc.