



Inner South Canberra Community Council

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ISCCC submission on NCA Kings and Commonwealth Avenue Draft Design Strategy

The Inner South Canberra Community Council (ISCCC) is pleased to provide a submission on the National Capital Authority (NCA) *Kings and Commonwealth Avenues Draft Design Strategy*.

1. Overview

The ISCCC believes that a long-term, coherent and inspirational plan for Canberra is sorely needed, not least to counter what has become rapid and seemingly random development and redevelopment. In this sense, we welcome the release by the NCA of the *Kings and Commonwealth Avenue Draft Design Strategy* for community comment.

The ISCCC has grave concerns, however, that, if implemented, the Draft Design Strategy (DDS) could have very substantial impacts on traffic flows through Canberra, and on vistas and parklands around Lake Burley Griffin.

The ISCCC's greatest concern is that the DDS does not acknowledge the vital role that both avenues play in connecting the city together. Commonwealth Avenue is the city's busiest road and carries some 67,000 vehicles per day (vpd) while Kings Avenue carries a further 36,000 vpd (according to figures provided by Roads ACT last week). Consequently, Commonwealth Avenue is more important than the Tuggeranong Parkway which only carries 59,000 vpd. Clearly anything which impacts on these traffic flows needs to be very, very carefully considered. This is not the case in the DDS where the authors suggest that Commonwealth Avenue carries more than 20,000 vpd (p. 1 Preamble). On the basis of this omission alone the DDS should be revised substantially to take into account current and likely future traffic scenarios and impacts.

The ISCCC believes that a rigorous traffic modeling and social cost/benefit analysis should be undertaken and released publicly before any decision is taken to reduce the number of traffic lanes across either or both bridges, and to restrict the speed limit to 60 km per hour. This analysis should be undertaken in conjunction with or after a decision is made on the route of the light rail.

The traffic flow consequences of proposed removal of the clover leaf ramps need to be examined in much greater detail, as does the impact on vistas across the parklands and the lake, and to the national institutions and the Parliament.

Given the likely long timescale for implementation of the proposals, other, wider ranging

issues need to be addressed. How will climate change impact on plantings along the avenues? Will the advent of electric cars, and then autonomous or driverless cars (or possibly vice versa), affect the proposals?

The ISCCC welcomes the DDS's proposals in so far as they relate to beautification and enhancement of the Avenues, subject to traffic impacts. We believe it desirable to water the grass in the median strips, and remove and replace ill, dying or dead trees. Similarly we would welcome any improvement of pedestrian and cycling facilities, and the provision of well designed new street furniture etc.

2. Comments on other specific issues

a. Community consultations

We note that the NCA has drawn on its 2013 community consultation report on this issue. This process attracted 15 written submissions and 46 electronic posts on the Have Your Say website and focused on some issues relating to the avenues themselves, but focused little on traffic impacts. We cannot find evidence of the ISCCC or any other community council or residents association being aware of, and participating in, the consultation process. It could well be that those groups had other priorities or competing demands during Canberra's centenary year.

b. Urban design and built form

We recognize that a number of buildings along both avenues have significant heritage value. These include the Hyatt Hotel, Albert Hall, National Library, Croquet Club, West and East Blocks and the National Gallery. We are concerned that these buildings and their landscape setting be properly protected and maintained. Consequently, we support the avenues and their iconic buildings being assessed with a view to them being given heritage classification and protection.

In addition, while these buildings are not all of the same architectural style, we note that the substantial soft landscaped areas surrounding the buildings currently ensure that they do not overshadow each other.

If the density of buildings were to be increased along the avenues, and we expect this to be the subject of separate consultation, consistency of architecture and plantings along the avenues would be important. This consistency could be achieved partly with height restrictions and restrictions upon use of external colour palettes and materials. However, other aspects of design, including shapes used, entrances, approaches and setbacks might need to become more prescriptive and less subjective in order to maintain continuity and visual harmony into the future.

Careful consideration might also need to be given to how the proposed siting of buildings at 45 degrees along either avenue would impact on the aesthetic experience of an observer. Extensive preliminary modeling and assessment should be conducted before this specific element of the Draft Design Strategy proposal becomes enshrined as policy.

We would also support consistency in use of street furniture, lights, benches and discrete signage. We agree that these details help to maintain continuity in external spaces.

c. Preservation of views to Parliament House

The purpose of Canberra is to provide a home for the national Parliament. Vistas along the avenues leading to the Parliament are fundamental reminders to visitors and residents that this is the nation's capital. In addition, the avenues form two of the three sides of the Parliamentary triangle. This triangle is a defining part of the Griffin plan for Canberra, having both historic and symbolic value.

While Parliament House is set into a hill, the flagpole on top of the Parliament and the gentle elevation of the hill at the end of the avenues need to be respected. We agree that Parliament House must not be overshadowed by any other structures in the area. For this reason, if for no other, the ISCCC strongly supports maintenance of the end-to-end vistas of the avenues, albeit softened by trees and landscaping.

As proposed by the Lake Burley Griffin Guardians in their submission, a professionally prepared view and vista analysis needs to be undertaken along the lengths of both avenues. In addition, the heritage-listed Parliament House Vista should be acknowledged in this Design Strategy and in compliance with the EPBC Act, this Strategy should be referred to the Department of the Environment and Energy.

d. Tree species selection

ISCCC notes the comments in the Strategy about native species as street trees and supports reinstatement of Weston's original choices of exotic species for the avenues. Exotic species are less dangerous (drop fewer limbs) and are easier to maintain as street trees (and therefore less expensive) than most native species.

A reduction in disease in formal monoculture plantings can be achieved through use of seeds from different plants rather than taking seeds from only one plant or a few closely related plants. As is well known, increasing genetic diversity when planting several of the same species close together will increase the overall viability of the group. For example, finding several sources of clean Dutch Elm seeds may help reduce future problems in replanting that species and should be investigated. Breaking up the planting pattern with different species, as proposed in the Strategy could also help reduce incidence of disease.

e. Resourcing issues

We are concerned that (possibly through lack of resources), the NCA has not provided more evidential material and research in this Strategy to give clarity to the long-term vision or to resolve some of the more fundamental dilemmas presented.

The ISCCC would like to see the NCA, as guardians of the spirit and form of the national capital, be able to engage additional resources to undertake more up-to-date research to support specific proposals. We are particularly concerned to ensure that a broader community consultation and appropriate engineering and economic analyses of the full implications of the DDS' proposals be undertaken. We also would like to see a comprehensive and independent assessment of the heritage value of the avenues and the current built form and full modeling of future building placements take place before the DDS is finalized.

f. Impact of light rail

It is difficult to provide considered comment on options when no final decision has been taken as to the light rail route across the lake from Civic to Woden – whether along

Commonwealth Avenue or Kings Avenue. The alignment of the light rail and of the pedestrian and cycling paths on the avenues is also undecided.

Clearly, greater certainty is needed on this issue before implementation of the DDS.

g. Maintenance of the Avenues

The ISCCC is of the view that the Strategy should include provision for ongoing, long term, maintenance of the avenues, the buildings on either side with heritage value, and the trees.

The current condition of the avenues and major thoroughfares such as Canberra Avenue demonstrates the problem when proper care and maintenance of trees (pruning, watering and feeding) are not conducted. As mentioned, exotic species generally require less maintenance than Australian species when used as street trees, however, the dry conditions and soils of Canberra necessitate some ongoing maintenance regime be consistently applied.

Incorporation of a long-term vision, with provision for heritage sites and buildings along the avenues as well as the trees and landscaping is needed in the Strategy. How will the different structures be protected over the next ten years, twenty years? They are an integral part of the history of the avenues and what makes them recognizable. How will the proper maintenance of these sites be monitored over time? What resources will be needed to do this monitoring? Who should have responsibility?

We thank you again for the opportunity to comment on this strategy. The ISCCC looks forward to a full NCA briefing and further community consultation on the Design Strategy once some of the uncertainties about the light rail route and traffic counts have been clarified, and as development and landscape plans are fleshed out.

Yours sincerely



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ISCCC Chair

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