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Draft Amendment 86 – Revised National Capital Plan

The Inner South Canberra Community Council (ISCCC) welcomes the opportunity to comment on Draft Amendment 86 – Revised National Capital Plan (NCP).

We were pleased that the National Capital Authority (NCA) has taken on board many of the comments made by the ISCCC and other individuals and organisations in response to the Exposure Draft of the NCP. It has been a very interactive process with ample opportunity for discussion with the Authority of the key issues.

For example, we are delighted with the NCA's proposal to reverse the proposal to remove the Special Requirements for Telopea Park, and that previous settings to protect the landscape qualities of the Park are retained.

On the other hand, we are disappointed that a number of our suggestions were not taken up in the Revised Draft. Key amongst these, we regret that the NCA has chosen not to adopt the suggestions made with respect to the proposed excision of the Murrumbidgee and Molonglo River Corridors from the Special Requirements provisions of the NCP. In particular, we had proposed that development in these areas should be the subject of amendments to the NCP, with all the rigour and consultation that such a process would involve.

The NCA response to the relevant comments on the Exposure Draft do little more than restate the original rationale for this reduction in NCA oversight, without responding to the specific concerns we had raised.

In this submission we wish to take the opportunity to raise several further matters relating to new matters introduced in the Revised Plan not in the Exposure Draft, or additional matters common to both. Some of these have been proposed by our constituent organisations and have been endorsed by the ISCCC.

Oaks Estate (proposed by Oaks Estate Progress Association)

Approach Routes

The NCP makes reference to the approach routes into Canberra as a whole, as well as the Parliamentary Triangle in particular. Specific roads and highways are

mentioned as designated routes where planning provisions should be in line with the public spaces design guidelines of the NCP.

However, there has been a failure to recognise the railway entrance to Canberra, in particular the Queanbeyan Station/Oaks Estate junction. This is for many people, their first glimpse of Canberra, being the first urban part of Canberra seen from the train. The appearance of the south portion of the village of Oaks Estate gives the impression of Canberra having industrial shanty-towns on its edge. The current master plan for Oaks Estate to allow industrial development along the entire Oaks Estate side from the train station will exacerbate this problem.

The NCP should recognise the railway as a designated approach into Canberra, and impose the same development restrictions as other designated main approaches. This issue will become of increased significance with proposals for high speed rail, or other proposals to increase rail journeys into Canberra.

Village Status

The NCP designates Tharwa, Hall and Oaks Estate as villages, but does not provide any further clarification. The NCP should provide some guidance on the need to protect the character of the outlying villages of the nation's capital. This would include requirements that all planning and development instruments should recognise the special 'national capital village' status of the three villages, and impose requirements that those planning and development instruments define and protect the village character. This would also be in accordance with the need to protect the character of the approach routes into Canberra, given that Hall and Oaks Estate are both on major approach routes.

Enforcement of NCP (proposed by YRA)

The ISCCC supports the Yarralumla Residents Association (YRA) concerns about inadequate enforcement of the NCP, noting the examples provided by YRA in relation to inadequate enforcement of the National Capital Plan. In particular, we strongly support the YRA proposal that the NCP include a section under Governance spelling out the requirement and mechanism for an ongoing transparent process of monitoring and evaluation to ensure effective implementation of its provisions.

Albert Hall (Friends of the Albert Hall)

The ISCCC supports the view of the Friends of the Albert Hall Inc, as expressed in their written response to the Exposure Draft and in subsequent discussions with the National Capital Authority, for there to be a 'location specific' land use for Albert Hall and its Heritage Precinct that includes provision for civic, cultural and community use of the Hall.

West Lake

The ISCCC is concerned that the NCA has apparently accepted the adoption of major changes to the shape of the West Basin of Lake Burley Griffin, as part of the City to the Lake scheme.

It is a matter for concern that the Authority appears to have made selective use of Griffin's 1918 plan to justify the reshaping of West Basin, while ignoring the heritage of Griffin's more important idea of reserving adjacent land for public recreation.

The NCDC's naturalistic landscape plan of 1963 for the shores of Lake Burley Griffin, a highly acclaimed scheme that has stood the test of time, adopted his plans for West Basin as a public recreation area without having to resort to the artificial formality of his 1918 shoreline.

This selective reliance on the Griffin heritage is clearly a means of expanding the area of dry land available for the City to the Lake scheme, and therefore is seen to be bowing to development interests and ignoring the public interest by accepting the alienation of valuable public parkland.

Any suggestion that the proposed promenade and reclamation of land in West Basin is restoring the Griffin vision can be seen as an attempt to enable public parkland to be alienated for development purposes. A false heritage argument is not a good look for the future of the City to the Lake scheme, and should be dropped. The objectives of the City to the Lake scheme can be met without having to reshape West Basin.

The ISCCC considers that flawed and partial reliance on the Griffin heritage to justify a marginal expansion of the City to the Lake scheme does not reflect well on that scheme, or the NCA. We have therefore come to the view that the reshaping of West Basin cannot genuinely claim to respect Griffin, and therefore should not proceed.

Deakin/Forrest Residential Area

The ISCCC agrees with the concerns expressed by the Forrest P&C submission in relation to the proposed transfer from Community Use to Mixed Use of Block 10 Section 13 Forrest. They include:

- the appropriateness of a transient population base in a residential setting on the grounds overlooking the school and childcare centre
- Deakin Preschool was (at considerable expense) recently expanded however cannot open at capacity unless Forrest expands as a result of the enrolment processes. The impact on childcare and pre-school requirements of the areas adjacent to the area covered by the NCP must be taken fully into account.
- Block 10 Section 13 would be an ideal setting for Deakin Preschool or MOCCA to move to (moving MOCCA to Deakin Preschool and building a new preschool unit at Forrest would be an option)
- the Out of School Hours Care (FOOSHC - a not for profit community run organisation managed by P&C volunteers which channels funds raised back to the school community) for Forrest Primary School currently uses the land to run its innovative program 'Beyond the Fence' and would like to continue
- FOOSHC is providing care for up to 150 children per day, and would be keen to expand its imprint if at all possible (currently within limited school space)
- the increasing accommodation options in the area raise the question of the need for serviced apartments or a hotel. Existing traffic congestion and parking problems in the neighbourhood and suggest these will only increase with a hotel or serviced apartments.

We are disappointed that the proposal to rezone Block 13 was made without any prior apparent community consultation.

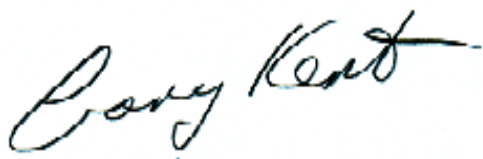
Other issues

There are a number of other issues about the NCP and the role, functions and resourcing of the NCA which we will take up at political level, as we appreciate they are not within the direct remit of the Authority. These include:

- the lack of any champion within the Commonwealth Government or Parliament generally for Canberra's national capital role. Successive Territories Ministers and even some ACT Federal parliamentary representatives have consistently talked down the role of and need for the NCA.
- the chronic lack of Commonwealth funding of the NCA which has in recent years undermined its ability to properly carry out its core functions, including responsibility for maintaining and upgrading national capital assets, such as those within the parliamentary triangle
- while the members of the Authority board each provide valuable contributions in their own right, there is a heavy Canberra-based focus which dilutes the ability of the board to reflect national capital interests
- political interference in relation to certain key national capital matters. For example, the process adopted with respect to the proposal to allow urban development in West Murrumbidgee was secretive and opaque without any apparent community consultation. Work undertaken by the NCA on this matter for the Government has to our knowledge never been made public.

Thank you for considering this submission and we would be happy to provide further information if this would be useful.

Yours sincerely

A handwritten signature in black ink that reads "Gary Kent". The signature is written in a cursive, flowing style.

Gary Kent
Chair

13 November 2015