



Ms Sally Barnes
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PATRON: The Hon Margaret Reid AO

Dear Ms Barnes

*Works approval application
Phase 2 Boardwalk and Land Reclamation, Block 23 Section 33 Acton*

Thank you for the opportunity to comment on the above application by the City Renewal Authority.

The National Trust (ACT) (the Trust) does not support the proposed West Basin development in its current form. We believe that no further work should occur at this site until a complete environmental and heritage assessment has been made.

Reasons for opposition

The Trust supports the arguments advanced by the Lake Burley Griffin Guardians in relation to West Basin. Those arguments are well-known, and we will not rehearse them here.

We note that a public meeting convened by the Guardians in 2016 attracted 200 concerned individuals where the overwhelming view was one of opposition to this development. Further, this sentiment was echoed strongly at a public meeting on planning issues in Canberra attended by 400 people at the Albert Hall in September 2018.

We are also aware of the very persuasive arguments made by the Walter Burley Griffin Society in this matter. In an article published in the Society's journal in May 2020,¹ Brett Odgers argues that the Griffin Legacy National Capital Plan amendments have become 'a charter for developers and source of land sale revenue.'

¹ Brett Odgers, Planning the National Capital: Interventions by the Walter Burley Griffin Society, 2020

We share this assessment. It is also clear that the main focus of the ACT Government has been developing prime national land for revenue-raising and West Basin is just one part of this strategy. It is wrong that the national capital assets are treated in this way.

The Trust agrees with Mr Odgers' assessment that the City Renewal Authority 'persists in falsely claiming its West Basin 4 urban development was envisaged by Griffin and they still confront unresolved issues of heritage, traffic, vistas, bridges, accessibility and public consultation.' Further, as pointed out by the Guardians, the apartments will create cold winter shadows and more than 200 trees will be removed.

Many of the arguments advanced in support of the West Basin development are not relevant to current circumstances or misleading.

For example, the fact that Griffin and the National Capital Development Commission (NCDC) had given a more regular shape to east basin, which was altered to its current shape when Parkes Way was constructed, is no justification to fill in part of the Lake to create a more regular shape now.

Further, the fact that the site has been run down and neglected for years is not a reason to create a high-density urban development there. The area can and should be made more attractive to Canberra residents and visitors through modest capital investment and more public facilities and concessions.

The public's right of access and accessible parking should not be a casualty. We do not support a massive expansion of apartments between the city and the Lake which will impact on a range of heritage issues.

Heritage assessment necessary

The Trust believes that there should be a new environmental and heritage study of the area covered by this works application before any further work is undertaken on this project. This should be followed by the establishment of appropriate planning controls. The previous study, a Heritage Impact Assessment by Lovell Chen, was completed in September 2015. It is not comprehensive, and it is dated.

Many important issues have not been addressed in the inexorable march towards approval of the West Basin development. There is no assessment of flora and fauna even though the Golden Sun Moth lives within the area; geological features on the Lake edge further around towards the National Museum of Australia, evidence of Indigenous presence in the area, and other water-related heritage and environmental issues, including wildlife habitats.

Also under threat from West Basin is the iconic view of the Brindabella Mountains from Commonwealth Avenue, south from City Hill and over the Lake. That this vista is potentially under threat is unconscionable.

National Trust Survey

The Trust has been consistently argued over many years for the proper protection of the iconic heritage values of the Lake Burley Griffin.

In 2009 the National Trust commissioned a survey of community and its members' views about the Lake, how they used it, and their favourite places along the shore.

We note that the Kingston foreshore development, which was underway at the time, was the least liked by responders. 700 responses were received and the resulting report² is an objective and definitive assessment of the importance of the Lake to Canberrans. Copies of this report were submitted to the ACT Heritage Council and the National Capital Authority.

National capital planning problems

The Trust believes that the West Basin proposal is reflective of a broader malaise in the planning system that is supposed to protect Canberra's status as a national capital of which we can all be proud.

In recent decades, especially since ACT self-government in 1989, the Commonwealth has effectively ceded control of national area planning to the ACT Government.

A prominent example of this is the failure of the Commonwealth Government after nearly a decade to act on proposals for the heritage listing of Canberra, which focus on the Lake and surrounds. A key reason for this has been opposition from the ACT Government. As stated above, the main focus of the ACT Government has been developing prime national land for revenue-raising.

Conclusion

We leave the last word to Mrs Heather Henderson AM, whose father Sir Robert Menzies, as Prime Minister, did so much to promote the development of Canberra as Australia's capital after years of stagnation. Mrs Henderson's views, as expressed in her letter to the *Canberra Times*, resonate throughout the community and the Trust commends them to you.

Lake Burley Griffin is one of the treasures of Canberra. Our government is planning to fill in a big piece of it in a very prominent place: next to the Commonwealth Avenue bridge. As if that isn't bad enough, it is to be filled in with concrete and embellished with a (no doubt hideous) block of flats.

We are told it will cost millions. For some mysterious reason, well beyond me, your paper referred to it as a "waterfront upgrade". It is not waterfront. It is in the Lake.

² Shirley Pipitone, Study of the Social Value of Lake Burley Griffin and its Setting Report to National Trust of Australia (ACT), 2009.

And "upgrade"? I have found no-one who agrees with that. There are masses of citizens of Canberra who can think of better ways to spend our money. The whole thing is irrational, unnecessary, and, indeed, vandalism on a grand scale.

Thank you for considering our submission.

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

22 May 2020

cc ACT Federal Members of Parliament
Assistant Minister for Regional Development and Territories
Joint Standing Committee on the National Capital and External Territories.
Members of the ACT Legislative Assembly
CEO, City Renewal Authority