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PATRON: The Hon Margaret Reid AO

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Attn: [redacted]

via email to terrplan@act.gov.au

Dear [redacted]

Re: DV368 City and Gateway South Northbourne Avenue Corridor

Overview

The City and Gateway work dates back over 10 years and was a collaborative undertaking between the Federal and ACT governments. To date it has resulted in four products:

1. a Framework document that describes a generally popular urbanist vision, but which in our view downplays heritage;
2. a National Capital Design Review Panel, now operating;
3. a National Capital Plan amendment that introduces special requirements to the Designated Area that the NCA directly controls; and
4. this draft variation, which encompasses parts of five suburban precincts, amends those, and creates a new instrument, the Northbourne Avenue Corridor Precinct Code (NACPC).

Heritage concerns

Our primary interest as a community stakeholder is to ensure that heritage values, heritage places, heritage buildings and objects are appropriately considered and respected, and that best practice is followed.

The period of public notification has been marked by a series of national emergencies relating to climate change issues and health. Considering that, we sought and received an extension, for which we were grateful. Having reviewed the material, including the submissions received, we wish to raise a number of concerns about the process as a whole and the content of this draft variation.

The Territory Plan's Statement of Strategic Directions provide a vital benchmark for evaluating whether this draft variation is consistent with the overall planning strategy for the Territory. The Statement highlights the importance of:

- community wellbeing and environmental quality;
- the maintenance of residential amenity;
- the need to safeguard sites for community needs;
- the preservation of open spaces; and
- the promotion of high quality/best practice development.

It includes the assertion that in the Plan “Particular care will be taken to ensure high amenity, quality design outcomes within residential areas, heritage areas ...”

The Statement also says, “Retention of Canberra’s unique landscape setting, including the integration of natural and cultural elements that create its 'garden city’ and ‘bush capital’ qualities, will be accorded the highest priority. Special attention is to be given to safeguarding visual amenity, protecting vegetation and other important features within the established urban landscape, and ensuring the high quality of environmental design in new developments or redevelopment.”

In its submissions to date regarding both the Framework and the NCA’s amendment, the National Trust has argued that the cultural heritage of the inner North (its garden city and bush capital features, visual amenity, vegetation, and landscaping) is being downgraded and lost. We have argued that urban design and place making must be grounded in a contextual analysis that takes in heritage, acknowledges that heritage values form part of the definition of environment under the *EPBC Act*, and are a key consideration when assessing a proposal in the Merit or Impact tracks. In order to deliver that result, the draft variation’s rules and criteria, together with the zone objectives should in our view be revised to reflect and incorporate heritage significance and values.

The National Trust has repeatedly raised concerns about the likely adverse impacts of increased building heights at the Northbourne-Macarthur/Wakefield intersection on a fundamental element of the Griffin Plan, the Majura-Black Mountain landscape axis embodied in Majura Avenue and its vistas. There is a cursory mention of respecting the Griffin Plan as a key element in 2.15 but the design of the Macarthur node ignores his vision for Majura Avenue as an axis.

DV368 ignores the principle of design within a heritage context and ensuring that heritage values and significance are not compromised. The area covered does contain heritage sites as is mentioned by the ACT Heritage Council on page 17 except it does not identify the Dickson and Lyneham Flats. Good urban design recognises heritage places and accepts that there should be consideration of heights and context when new buildings are placed beside or near heritage places.

The National Capital Design Review Panel is endeavouring to apply the principles of good urban design but if heights are permitted or required within planning instruments then it is virtually impossible to prevent maximisation of development and a poor outcome.

Main points

DV368 needs to be amended to explicitly respect heritage places and ensure a good design outcome in an urban context. The places affected are those listed in the ACT Heritage Council advice on page 17 but also the vistas from Majura Avenue to Black Mountain, Havelock House, Dickson/Lyneham Flats, Holy Trinity Lutheran Church in Turner and SDA Church Turner.

Public open space is essential if the intensity of building as intended is realised, to meet the needs of a very much larger resident population containing a wide range of age groups. The proposed setbacks and lanes will not provide the open space and recreation space required. If Haig Park can manage the total demand is not reasonable or suitable. More open space is essential if wellness and healthy living is to be considered let alone achieved.

DV368 warrants a thorough social impact assessment and urban design analysis that takes in heritage and connection to place. *That is missing, as is any traffic impact analysis or environmental impact analysis or economic impact analysis.* The threat to heritage and its contribution to place making, and long-term sense of community cohesion and belonging and distinctive identity, are significant issues.

We reiterate our concerns about the *loss of the vista to Black Mountain that is an intrinsic and fundamental part of the Griffin Plan*, because the building heights that the NACPC stipulates threaten to sever the landscape connection that makes the Majura Avenue approach route to the city centre legible and memorable.

Kind regards

[redacted]

President

17 April 2020