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COMMENTS ON NATIONAL CAPITAL PLAN EXPOSURE DRAFT

The Ginninderra Falls Association (GFA) understands that the purpose of the Exposure Draft is to explore ideas and seek feedback on the restructuring of the National Capital Plan which is considered to be cumbersome. The *ACT (Planning and Land Management) Act 1988* (Cwth) is unchanged, so the role of the National Capital Authority is unchanged.

GFA Members are not qualified planners and are not familiar with the detail of the current Plan. It is, therefore, not appropriate for GFA to attempt to make detailed critical comments of the proposed new arrangement. We note, however, a Canberra Times article of 30 April 2015 that advised,

Federal cabinet has agreed to significantly curtail the power of the National Capital Authority over planning in parts of Canberra, signing off a proposal to scrap the authority's control over the Molonglo and Murrumbidgee River corridors, Namadgi National Park and the Tuggeranong Valley.

We would, therefore, like to make the following observations:

1. The criticism that the National Capital Plan adds a layer of complexity to ACT planning that should be removed is worrying. The ACT's Territory Plan, which defines the development process in Canberra in accordance with policies in the National Capital Plan, has been continually revised since 2008 in response to criticism that it is too restrictive and too difficult to navigate. None of these changes seem to have satisfied the critics and the Territory Plan has actually become more complicated and less unified because of the never-ending changes. The GFA would not like to see the National Capital Plan emasculated in the same way.
2. In the article quoted above, Senator Seselja was quoted as saying that, *(The Commonwealth) should have a strong focus on the parliamentary triangle and national institutions, but when we're talking about areas 20 or 30 kilometres away from Parliament House, I think it's right that ACT government should be able to make those decisions.*

The GFA is concerned that revision of the National Capital Plan should not reduce the National Capital Authority's ability to ensure that the ideals behind the design of Canberra, both the central area and the outlying townships, remain the standard that must be respected.

3. The GFA is concerned that the removal of material from the Plan, such as civic centre townscape provisions, and their replacement by supporting documents, might weaken the focus of the National Capital Authority and the ACT Government on these provisions.
4. The GFA disagrees with this narrowing of the National Capital Authority's area of responsibility. The ACT Government is subject to continual pressure from development interests, as well as financial and population pressures. It is essential that the National Capital Plan will adequately enable the National Capital Authority to be the arbiter of policies that are implemented by the ACT Government.
5. In relation to the Australian National University policy, the GFA questions the desirability of allowing twelve storeyed buildings at selected locations on the campus. As the ANU campus is located between the lake and the base of Black Mountain, such buildings will inevitably detract from the natural landscape vista.
6. The GFA regards protection of our hills, ridges and buffer zones as an essential element that must not be sacrificed to different city visions and population pressure. Moreover, as Canberra's urbanisation spreads to the ACT border and beyond into NSW, the NCA has to be mindful of the hills, ridges and buffer zones which lie in NSW itself. Binding covenants with NSW jurisdictions and landowners are necessary to protect the existing character of the national capital as a city in the landscape. The West Belconnen proposal to extend the urban area across the ACT border into NSW is but the first example of this inevitable trend and reinforces the need for protection of hills, ridges and buffer zones to define the urban edge of the national capital.

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22 July 2015