25 May 2020

Ms Sally Barnes  
Chief Executive  
National Capital Authority  
By email: worksapproval@nca.gov.au

Dear Ms Barnes

Submission on Phase 2 Boardwalk and Land Reclamation located at Block 23 Section 33 Acton (Acton Waterfront)

Thank you for the opportunity to comment on the West Basin Phase 2 Land Reclamation and Boardwalk Development. This letter is a submission on behalf of Australia ICOMOS.

ICOMOS – the International Council for Monuments and Sites – is a non-government professional organisation that promotes expertise in the conservation of cultural heritage. ICOMOS is also an Advisory Body to the World Heritage Committee under the World Heritage Convention. Australia ICOMOS, formed in 1976, is one of over 100 national committees throughout the world. Australia ICOMOS has over 700 members in a range of heritage professions. We have expert members on a large number of ICOMOS International Scientific Committees, as well as on expert committees and boards in Australia.

Australia ICOMOS understands that the Phase 2 works approval application is for construction of a boardwalk with associated infrastructure, street lighting and furniture, demolition of the former boat hire building and jetty, tree removal and land reclamation works. Future works approval applications will be submitted for site establishment, traffic management and construction environmental management plan, temporary landscape and activation and stormwater works. We have also sought information about potential future development for the Acton Waterfront at the City Renewal Authority (CRA) website using the NCA link. The City Renewal Authority website includes the statement:

The National Capital Plan envisages Acton Waterfront as:
‘a vibrant cultural and entertainment precinct on a waterfront promenade. The area will create a new city neighbourhood, extending the city to the lake with a cosmopolitan mixture of shops, businesses, cafes, recreations, tourist activities and accommodation.’

However little information is provided about future stages except that there will be landscaped public spaces and a continuous waterfront urban park, subject to the availability of funds through budget bids.

Australia ICOMOS believes that the absence of an overall and finalised masterplan for the West Basin is a serious deficiency. We note that a preliminary masterplan was previously prepared, as indicated on the CRA website, and that the NCA has produced precinct guidelines. None the less, this is a highly valued heritage landscape and the submission of works approval applications in parts without an overall context is unsatisfactory and does not facilitate a full understanding of heritage impacts.

ICOMOS has previously commented on our disappointment with the lack of statutory recognition of the heritage values of Lake Burley Griffin (refer to the attachment). We note that the Heritage Management Plan (HMP) for Lake Burley Griffin and Adjacent Lands prepared by Godden Mackay Logan in 2009 found that the lake including West Basin satisfies the threshold for inclusion in the Commonwealth Heritage List (CHL) and met the threshold for inclusion in the National Heritage List (NHL).
It is disappointing that nominations for both the CHL and NHL have not progressed and that NHL nominations relating to Canberra which include Lake Burley Griffin have also not resulted in the protection of the heritage values of the West Basin. In any event, there is strong and credible expert evidence of substantial heritage values which should be respected.

It is also disappointing that the HMP has not been revised and updated since 2009, although it is understood this is currently under way. There has been substantial international progress on understanding cultural heritage landscapes and the contribution of settings to heritage values. In our opinion, the HMP update should be finalised prior to works being permitted.

When Australia ICOMOS became aware of the Phase 2 Works Application, we looked at the documentation available and found no heritage assessment as part of the application. I wrote to the NCA and asked if one was available. Since then, the Heritage Impact Statement for the West Basin Foreshore Development, prepared for the Land Development Agency by Lovell Chen in September 2015, has been added. I note that this addresses drawings dated 3 March 2015, issue B (See section 1.2.1) which are not the current application drawings. While the Heritage Impact Statement may be generally applicable it should have been updated to address the current proposal, including the tree removals proposed. It should also consider the works within the context of the overall proposal. One of the risks with the staging of the works is the potential for cumulative impacts as well as evolving designs not to be properly assessed.

Australia ICOMOS believes the applicant should be asked to prepare a final masterplan and provide a more comprehensive context to the Phase 2 application. In the absence of an understanding of the works beyond Phase 2, it is difficult to fully assess the proposal. This has been made more difficult due to an outdated HMP and a Heritage Impact Statement which does not specifically address the proposal. This is not an example of good heritage or planning practice and it is particularly distressing given the high heritage values of the place. In our view, these are substantial concerns which should be addressed.

Please contact me if I can be of further assistance.

Yours sincerely

Helen Lardner
President

Attach.
For the attention of:

The Honorable Malcolm Turnbull MP
Prime Minister of Australia

The Honorable Josh Frydenberg MP
Minister for the Environment and Heritage

The Hon Dr John McVeigh MP
Minister for Regional Development, Territories, and Local Government

Mr Ben Morton MP
Chair of the Joint Standing Committee for the National Capital and External Territories

Mr Andrew Barr
MLA Chief Minister ACT Government, Minister for Urban Renewal

Mr Mick Gentleman
MLA Minister for Heritage Planning

Our Ref.: GJ/TK/18

Paris, 19 February 2018

Dear Sirs,

ICOMOS, the International Council on Monuments and Sites - a unique, non-governmental, not-for-profit international organisation, committed to furthering the conservation, protection, use and enhancement of the world's cultural heritage - held its 19th General Assembly and Scientific Symposium in Delhi (India), December 2017.

During this event, which gathered over 1000 participants and guests from 113 countries, and saw 65 ICOMOS National Committees represented, a Resolution concerning the “Conservation of the Lake Burley Griffin and Lakeshore Landscape, Australia” (n° 19GA 2017/15) was unanimously approved and adopted (see the full resolution below).

ICOMOS requests the Australian national and state authorities to halt planned infill development to ensure the removal of threats and to ensure that the inclusion of the Lake Burley Griffin and Lakeshore Landscape to the National Heritage List is progressed without further delay, and furthermore that all development and use of the Lake Burley Griffin and Lakeshore Landscape, including that proposed in the West Basin, be guided by an overarching conservation management plan.

ICOMOS, through its joint ICOMOS-IFLA International Scientific Committee on Cultural Landscapes and ICOMOS Australia, remains at your disposal for support in ensuring that the cultural heritage significance of this outstanding heritage landscape is safeguarded, and its heritage and environmental values protected.

Yours sincerely

KONO Toshiyuki

Toshiyuki Kono
President

Copy to:
ICOMOS Australia
ISCCL/ICOMOS-IFLA
Resolution 19GA 2017/15 - Conservation of the Lake Burley Griffin and Lakeshore Landscape, Australia

The 19th General Assembly of ICOMOS,

Recalling the ICOMOS International Charter for the Conservation and Restoration of Monuments and Sites (The Venice Charter, 1964); the ICOMOS Charter for the Conservation of Historic Towns and Urban Areas (1987); the ICOMOS Valletta Principles for the Safeguarding and Management of Historic Cities, Towns and Urban Areas (2011); and the ICOMOS Xi’an Declaration on the Conservation of the Setting of Heritage Structures, Sites and Areas (2005);

Recognising that the Lake Burley Griffin and Lakeshore Landscape is of national heritage value as a unique cultural landscape that is an integral part of the designed city of Canberra;

Noting with concern that the current development proposals threaten to substantially change the landscape, adversely undermining its cultural heritage value;

Taking account that the current management framework around the Lake Burley Griffin and Lakeshore Landscape is inadequate for such a significant heritage landscape, and measures urgently need to be taken to address this;

Expresses concern that National Heritage Listing by the Australian Government to conserve the outstanding heritage value of the cultural landscape has not progressed;

Requests that the planned infill development should be halted to ensure the removal of threats to identified national heritage;

Requests the Australian Government to ensure that the inclusion of the Lake Burley Griffin and Lakeshore Landscape to the National Heritage List is progressed without further delay;

Calls on the Australian Government to investigate and activate all possible measures to ensure that all development and use of the Lake Burley Griffin and Lakeshore Landscape, including that proposed in the West Basin, be guided by an overarching conservation management plan that recognizes the cultural heritage significance of this outstanding heritage landscape and protects the heritage and environmental values;

Letters sent to:

The Honorable Malcolm Turnbull MP
Prime Minister of Australia
PO Box 6021, Parliament House, Canberra ACT 2600

The Honorable Josh Frydenberg MP
Minister for the Environment and Heritage
Josh.Frydenberg.MP@aph.gov.au

The Hon Dr John McVeigh MP
Minister for Regional Development, Territories, and Local Government
PO Box 6022
House of Representatives
Parliament House, Canberra, ACT 2600
John.McVeigh.MP@aph.gov.au

Mr Ben Morton MP
Chair of the Joint Standing Committee for the National Capital and External Territories
PO Box 6021, Parliament House, Canberra ACT 2600
jcncell@aph.gov.au

Mr Andrew Barr
MLA Chief Minister ACT Government, Minister for Urban Renewal (January 2015)
Legislative Assembly GPO Box 1020, Canberra ACT 2601
barr@act.gov.au

Mr Mick Gentleman MLA Minister for Heritage Planning
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gentleman@act.gov.au