

Andrew Smith
Chief Executive Officer
NCA

Submission on the proposal to Raise London Circuit

Dear Sir,

The Inner South Canberra Community Council is pleased to provide comments on the ACT Government proposal to raise London Circuit (RLC) which has been submitted to the National Capital Authority (NCA) for Works Approval.

1. Overview

This submission sets out reasons why the NCA should not grant Works Approval for RLC. In summary, they are:

- The NCA has undertaken previous work relating to Commonwealth Avenue, but the stakeholder inputs from that work have not been reflected in the RLC proposal
- All aspects of RLC need to be examined together and the NCA should not progress Works Approval for RLC in isolation from Light Rail Stage 2
- The need for RLC is questionable — If the ACT Government needs the revenue from leasing the land within the cloverleaf ramps, it could do so without RLC
- The RLC makes unsubstantiated and/or unsupported claims about how the RLC proposal is consistent with the National Capital Plan (NCP). These need to be examined critically
- Claims of “future proofing” the transport network through a massive investment in light rail (which suffers from inflexible routes, inability to provide express services, and high track construction costs with significant greenhouse gas emissions) should be rejected
- On its own, RLC will not improve connectivity for cyclists and pedestrians and will not improve access to Lake Burley Griffin
- There will be significant adverse impacts (traffic, noise, parking, travel time, pedestrian access, greenhouse gas emissions and road damage) during the extended period of RLC construction
- In particular, the loss of a large number of parking spaces in the CBD will adversely impact on workers, shoppers, businesses and theatre goers
- Travel time between north and south Canberra will be increased
- RLC will have a negative impact on the landscape and vistas that are an essential element of the Griffin design.

RLC is part of Light Rail stage 2A. Works approval for RLC should await a full response to the Auditor General’s report on Light Rail Stage 2A. Any consideration of RLC by the NCA should only take place in the context of a fully documented Works Application for Light Rail Stage 2.

2. Previous NCA studies

The ISCCC notes that the documentation supporting the RLC proposal fails to take into account concerns expressed in relation to the 2013 consultation on Kings and Commonwealth Avenues Renewal. It also fails to address concerns raised in relation to the 2017 *Kings and Commonwealth Avenue Draft Design Strategy*. This Strategy drew submissions from a range of stakeholders, including the ISCCC, the Lake Burley Griffin Guardians and The National Trust. Those submissions provided detailed critical comment on such matters as the removal of clover leaf ramps, the loss of

vistas and sight lines, and the lack of details for the proposed development of West Basin. The NRMA referred to Commonwealth Avenue as an arterial road of national significance and stressed that ensuring the efficient flow of traffic along Commonwealth Avenue was of paramount importance.

3. Scope of the present consultation

Your online video about the Raising London Circuit (RLC) project states that you are seeking comment on design, quality, traffic modelling and any other issue that the public considers the NCA should be addressing and investigating. In our view, there is no justification for limiting the consultation on this project to the three matters noted above. This project involves a large investment and would have significant adverse impacts in both the construction and operational phases. All aspects of the project should therefore be thoroughly examined by the NCA to ensure that the NCA's legislative responsibility for ensuring Canberra is planned and designed in accordance with its national significance is properly discharged.

We believe that the NCA has a responsibility to examine the underlying objectives rationale for the RLC project. The documentation presented to the NCA indicates that there are, in effect, two main reasons for raising London Circuit:

- The ACT Government wants to gain revenue from the development of land in the clover leaf access ramps; and
- RLC would allow the Light Rail to get to Commonwealth Avenue from London Circuit.

The first of these objectives could be achieved without raising London Circuit. The Business Case for RLC recognises that there are other options available which would enable development of most of the land currently within the clover leaf ramps. The ISCCC believes that any development of this land would need to be the subject of separate consultation.

That leaves the second objective standing on its own. It is our view that Light Rail Stage 2A cannot be justified on its own, and statements by the Government (and the Auditor general) appear so support that view. Stage 2A can only be justified if Stage 2B is approved. In the absence of Stage 2B, Stage 2A would be a "white elephant". Adopting a piecemeal approach to examining the components of Light Rail Stage 2 (such as the RLC) is not going to allow the proposal to be examined in its entirety. The NCA should delay consideration of RLC until documentation is available for all of Stage 2.

The RLC is to facilitate Light Rail Stage 2A which, as the ACT Auditor General has pointed out, has a very low benefit cost ratio and its calculation, presented in the Business Case, is dubious. In the light of the Auditor General's findings alone, the project cannot be justified and should not be approved. And when the additional cost of RLC is taken into account (\$9 million in 2021-22), the benefit cost ratio for Light Rail Stage 2A is even lower than that presented in the Business Case.

The Commonwealth Government is contributing more than \$132 million of Australian taxpayers' money to Stage 2A. We believe that in the light of this, the NCA as the Commonwealth Government's agency responsible for Works Approval, should seek the advice of the Commonwealth Department of Finance on whether this project meets Commonwealth Government criteria for infrastructure funding. We believe it does not.

The ACT Minister responsible for Transport has yet to respond to the Auditor General's report. Until the response to that report and the actions recommended by the Auditor General have been taken, we believe that it would be premature for the NCA to consider Works Approval for any part of the project, including RLC.

4. RLC and the National Capital Plan

The National Capital Plan (NCP) refers to the City Hill Precinct as the “pre-eminent heart of the City”. It refers to the “symbolic importance” of the City Hill Precinct and that this is to be reinforced in the design treatment of streetscape and public places, which are to be of “high quality”. There are to be “major buildings of municipal or cultural significance 'located adjacent to City Hill Park with the main address on Vernon Circle” and “public art and art spaces in new development”.

There is a reference in the NCP to introducing “mechanisms” to “give priority to public transport” but nothing that endorses light rail. Indeed, the Permitted Land Uses (para 4.6.4) do not include light rail and there is no mention of light rail in relation to the City Hill Precinct or West Basin. The NCP's vision for this area is quite different to what is planned by the ACT Government (as revealed in the RLC documentation).

The project documentation makes a number of unsubstantiated claims about how this project is in line with the NCP vision for Canberra City. Some of these documents have not been prepared by independent consultants. Several have been authored by AECOM, which is expecting to benefit from a \$93 million contract if Light Rail Stage 2 goes ahead. We believe that claims in the RLC documentation need to be critically scrutinised by the NCA. For example, the project documentation claims that:

Raising London Circuit to be an at-grade intersection with Commonwealth Avenue would align the road network with strategic transport and land use planning for the City, improve urban amenity and support the revitalisation of the City precinct.

Traffic and Transport Impact Assessment

This is typical of the “marketing” claims in the RLC documentation. We have found no evidence to support the claim that this project “would align the road network with strategic transport and land use planning for the City.

5. Urban amenity

The RLC documentation makes claims that the RLC will improve urban amenity. The Business Case definition of urban amenity refers to the quality of public streetscapes from a human perspective. The Business Case talks about RLC delivering “significant public amenity as the new intersection will contribute to enhancing connectivity between open spaces and amenity within Canberra City.” Urban amenity is also claimed from the benefits of “strong active frontages”. The problem with these claims is that RLC, in itself, does not create these alleged benefits. The possibility that they may arise from some future development is purely speculative.

In our view, removing grade separation between London Circuit and Commonwealth Avenue will significantly reduce urban amenity and impede traffic flows between north and south Canberra. In a previous era, London Circuit intersected with Commonwealth Avenue at grade. The present bridges and clover leaves were installed at significant cost to facilitate the flow of traffic, by keeping north-south through traffic separate from traffic moving within the CBD. Writing off this investment should be taken into account in any assessment of RLC.

The RLC documentation also claims that the project will result in “Improved urban design and amenity outcomes **consistent with the strategic planning and development vision in the NCP**” (emphasis added). The documentation does not identify anything in the NCP to support this statement. As noted above, the current grade separation between London Circuit and

Commonwealth Avenue provides excellent amenity outcomes. It is very difficult to see how the proposed new intersection, with traffic lights, will result in improved urban design. What it will do is to impede traffic flow between north and south Canberra.

6. Future proofing the transport network

The Traffic and Transport Assessment claims that the project will play a strategic role in “future-proofing the transport network by providing infrastructure that responds to current needs and also provides strategic capacity for future growth development.” It is ridiculous to claim that providing for light rail will *future proof* the transport network. Compared to more modern transport solutions, light rail suffers from inflexible routes, increased journey times, major traffic disruption, the inability to provide express services, and high track construction costs with significant greenhouse gas emissions. The documentation also fails to demonstrate why RLC is even necessary to achieve “future growth development.” There are plenty of opportunities available for future growth development in the CBD that do not depend on RLC.

7. Connectivity

The RLC documentation claims that the design will result in improving pedestrian and cyclist connectivity accessibility are not correct. For example, RLC will force pedestrians who previously could walk round a level footpath on London Circuit unhindered, to now have to climb up to the level of Commonwealth Avenue and wait for the traffic lights to change. This will particularly be an issue for guests staying at the QT Hotel. Nor will RLC help in “creating connectivity between the city and Lake Burley Griffin” – if anything it will make accessing the Lake from the CBD more difficult.

Improved connectivity between the city and Lake Burley Griffin might be achieved at some time in the future by measures which are mentioned in the RLC documentation, but have not yet been designed, much less funded. For example, there are suggestions that Parkes Way will be partially covered and that a foreshadowed West Road may be built. The possible future construction of these routes cannot be used to support the case for RLC. In fact, RLC on its own, will make access to West Basin more difficult.

Currently, cyclists can cross the Lake via Commonwealth Bridge and take a route away from Commonwealth Avenue to the footbridge across Parkes Way. This provides access to the western part of the CBD via Marcus Clarke Street or to the eastern part via London Circuit. These routes work well, and it is hard to see how RLC will result in an improvement. Cyclists can also access the footpath/cycle path on the eastern side of Commonwealth Avenue Bridge.

8. Appearance and visual impact

Claims that the project will provide “a more desirable appearance and local amenity” also do not stand up to scrutiny. These are just baseless claims unsupported by any specific evidence. The Environmental Assessment concedes that there will be adverse landscape and visual impacts from five viewpoints (page ix). The new London Circuit – Commonwealth Avenue intersection (complete with traffic lights) can hardly be claimed as enhancing the pleasantness or attractiveness of the location.

In our comments on the 2017 Design Strategy we emphasised the importance of the vistas across the foreshore parklands and the Lake, all the way to the Brindabellas. End-to-end vistas are something which visitors associate with Canberra, and they can be found in other capital cities such as Washington and Ottawa. Development facilitated by RLC will interfere with these vistas and with the vision that the Griffins had for our city.

9. Construction impacts

Impacts during construction appear to be understated:

- The delay times from the Traffic and Transport Assessment appear to rely on assumptions about the extent that traffic which normally uses Commonwealth Avenue will be diverted to other longer routes. The (additional) delay times from congestion do not appear credible.
- The documentation understates the costs arising during the construction period from longer journey times due to traffic delays and diversions, and lower speed limits (time cost of travellers including commercial traffic).
- The impact of 5,200 24-tonne trucks transporting fill to storage and the from storage to the London Circuit site is dismissed as “are not anticipated to contribute to a significant cumulative impact on traffic during construction.” We beg to differ.
- Traffic delays during construction will impact severely on emergency vehicles, which will have no way of passing queued traffic. Response times will increase.
- There is no assessment of the loss of business likely to be experienced by businesses in the CBD during construction, when southside residents choose to go elsewhere for goods and services rather than put up with the inconvenience caused by RLC. The experience of construction of light rail in Sydney shows that this problem can be serious.
- The suggestion that tradespeople might travel to the site by public transport (Traffic and Transport assessment, page 80) is not practical. Most of these workers need access to their tools which are stored in their vehicles.
- Additional travel time will impact adversely on bus travellers. The low estimates of additional travel time that will be incurred are not credible.
- The loss of 640 long-stay parking spaces during construction will seriously inconvenience the Canberra public. As the Environmental Assessment notes, many of the carparks in the study area typically reach capacity on weekdays. Canberrans wishing to attend performances at the Canberra Theatre will face particular difficulties.

10. Operational impacts

It is clear from the project documentation that, apart from getting Light Rail Stage 2A up to the level of Commonwealth Avenue, the RLC project *per se* has few benefits and significant negative transport impacts:

- The new intersection, additional traffic lights and lower speed limits will slow trip times between the CBD and south Canberra.
- Access routes to some CBD venues will be lengthened and made more complicated (e.g. access to the QT Hotel).
- The potential for tailbacks on Commonwealth Avenue and Vernon Circle has not been adequately analysed. These have the potential to clog intersections in the area back to the end of Northbourne Avenue, particularly at rush hour.
- The conclusion that “Increased travel times due to traffic growth and RLC in 2026 is possible but the consequences are minor” (Environment Report page 97) is disingenuous. Travel times will be longer due to RLC, and the consequences will not be minor.
- The proposed restrictions on traffic turning at some intersections are likely to create problems that have not been assessed. For example, removal of the southbound right turn at the intersection of London Circuit and Edinburgh Avenue seems particularly ill advised. This

change will force traffic to cut through the narrow side streets which access Marcus Clarke Street.

- The claim in the Environmental Assessment that “continuous footpaths proposed along London Circuit would make it easier to walk between London Circuit east and west” is not correct. There is currently a footpath that does this, and it does not have to cross Commonwealth Avenue.

11. Conclusions

This submission sets out reasons why the NCA should not grant Works Approval for RLC. They are:

- Loss of grade separation between London Circuit and Commonwealth Avenue will result in reduced urban amenity
- RLC is not necessary for the ACT Government to realise the value of land within the cloverleaf ramps
- There will be significant impacts (traffic, noise, parking, travel time, pedestrian access, greenhouse gas emissions) during the construction of RLC
- The loss of parking spaces in the CBD will adversely impact on workers, shoppers, businesses and theatre goers
- Travel time between north and south Canberra will be increased
- RLC will have a negative impact on the landscape and vistas that are an essential element of the Griffin design

RLC is part of Light Rail stage 2A and works approval should await a full response to the Auditor General’s report

Any consideration of RLC by the NCA should only take place in the context of a fully documented Works Application for Light Rail Stage 2

Yours

Gary Kent
Chair, Inner South Community Council