

# Submission to the National Capital Authority

## Re: Raising of London Circuit Consultation

### 1 Background

In seeking comments the NCA states that:

*“The ACT Government is seeking approval from the National Capital Authority (NCA) to undertake a range of changes to Canberra’s traffic movements including the raising of London Circuit to become a four-way intersection. These projects are being proposed to facilitate development of several undeveloped city blocks and to provide a path of travel for a future light rail system.*

*“In September 2019, the ACT Government announced its plans to extend Canberra’s Light Rail system from the City to Woden and is currently developing detailed designs for the light rail route to Woden. The design work commissioned for Light Rail to Woden has not been presented to, or considered, by the NCA. The Light Rail to Woden proposal does not form part of this consultation process.*

*“The NCA has however received three separate works approval applications that will enable a future light rail project.”*

What is not clear from this statement is the relative importance of these various objectives and to what extent the ACT Government has examined alternatives to the light rail route and light rail itself as well as alternative approaches to facilitating the development of some undeveloped city blocks. For example, they do not indicate if the provision of a “path of travel for a future light rail system” is the main reason that they want to raise London circuit by 6 meters. The ACT Government’s own Guidelines state that an environmental assessment should always consider feasible alternatives to the project. (Refer ACT Proponent’s Guide to Environmental Impact Statements.)

The NCA should insist that the ACT Government clearly justifies its reasons for raising London circuit **independent** of the City to Woden Light Rail proposal because this proposal has not received either Works Approval by the NCA or Development Approval by the ACT Government and therefore is not finally approved.

### 2 The Approach

**LBBG strongly objects to this piecemeal approach** to planning for Light Rail Stage 2. If light rail is the main reason for raising London Circuit then the NCA should not approve it until the detailed proposal for phase 2 is available and approved.

It appears that the ACT Government is following the current practice of governments of obtaining piecemeal planning approval to lock in a project before the technical, environmental and economic feasibility of the whole proposal has been fully assessed.

This is taking a blindfolded approach to planning and risks wasting vast sums of money in sunk costs for projects which may, or should not, proceed. We consider that this is a highly unprofessional approach.

- As Richard Johnston has noted, “The ACT Government has not demonstrated in these applications that raising London Circuit is essential for or gives any significant assistance to meeting the project’s stated objectives.” It has not been demonstrated that this work is essential for City to Woden Light Rail, which has not yet been approved.

### **3 Major Issues**

The raising of London Circuit has a string of associated major issues which must be adequately evaluated before this proposal is finalised such as:

#### **3.1 Impacts**

- Using Commonwealth Avenue as the route for Light Rail is extremely high cost demanding *inter alia* the raising of London Circuit and a new bridge between the spans of Commonwealth Bridge. The impact on Commonwealth Avenue and its feeder routes is extreme traffic congestion, particularly during construction.
- The December 2021 Disruption Task Force Update from the ACT Government casts serious doubt on the adequacy of the Environmental Assessment for this project. For example it notes during the bridge construction traffic capacity on the bridge will be reduced by 80%. That is 44,000 vehicles per day will have to be diverted from the bridge to other roads. The Environmental Assessment seems to minimise the traffic impacts.
- The NCA should closely examine the information provided on traffic impacts in the Works Approval Application documents as we believe that it is inadequate and possibly misleading.
- The Taskforce Update also states that public transport will be a good alternative to the car during the forthcoming disruption. However, the EA makes it quite clear that the rapid bus routes to the city from the South will be seriously disrupted during the construction period commencing with the raising of London Circuit and continuing for many years while the mooted Light Rail Stage 2 is constructed.
- The replacement of a grade separated with a signalised intersection will cause more traffic stoppages and time delays for commuters and traffic congestion. Overall the raising of London Circuit and associated light rail works will add significantly to traffic congestion on the main ceremonial route into Canberra.
- The additional nearly 2,000 tonnes of GHG emissions estimated for this unnecessary project should be avoided as well as the 60,000 cubic meters of fill that would have to be brought into the city.
- Significantly the Environmental Assessment found that the potential and perceived socioeconomic impacts were given a High to Very High Risk Rating. These included impacts on road users due to traffic congestion during construction, effects of temporary loss of parking on accessibility to services and

business, delays for users of public transport. **These were listed as significant and unlikely to be managed or mitigated.**

- The Australian Automobile Association's 2018 Congestion Report found that while Canberra compares reasonably well with other cities, "The measurement for congestion. Percentage of Free Flow (POFF) speeds, has deteriorated significantly since 2016.
- It is essential that the congestion costs of years of traffic disruption on this route are accurately quantified and incorporated into a detailed cost benefit analysis and business cast for Light Rail Stage 2. As noted the ACT Auditor General found that the business case the ACT Govt was using in support of Light Rail Stage 2 A was seriously lacking and needed to be re-done.

### ***3.2 Route Selection***

- Due to the very high impacts from traffic congestion and construction noise why is raising of London Circuit even considered when Light Rail could be routed around Vernon Circle with much easier grades, far less disruption to traffic and damaging impact? There appears to be no option of using Vernon Circle considered in the existing planning report, why not?
- How is it demonstrated that this is the best route to Woden for community needs?
- This light rail route does not service any of the work hubs of Barton, Russell, ASIO or the new central Canberra University of NSW that a Kings Avenue location could. The only point provided by the ACT was that it is a little shorter in length.
- It appears that the Commonwealth Avenue route has been chosen by the ACT Government as the best route to enable development in key central Canberra open landscapes such as West Basin's Acton Park, the cloverleaf areas of London Circuit while ensuring the space beside Albert Hall and Lotus Bay are key future development areas. The issue of filling in essential city open spaces is becoming a serious climate change concern and became a social issue concern during the pandemic.

### ***3.3 Transport Alternatives***

- In rejecting this proposal the NCA should advise the ACT Government to investigate the feasibility of using alternative transport systems for a future Stage 2 route. This proposal is to facilitate the selection of a transport system which is potentially now superseded and unfortunately cannot climb uphill. As Penleigh Boyd has indicated in his submission there are other transport solutions which possibly deliver better outcomes without the massive disruption to traffic, costs and without the need to destroy the present grade separated intersection.
- Public transport technology is changing rapidly and the ACT should be aiming to introduce the best and most efficient and cost effective technologies. Other state capitals are introducing new technologies. For example Brisbane is introducing electric trams that can run all day using a "flash-charging system" and Melbourne is considering trackless trams for future public transport routes. (P.Boyd submission)

- Perth is beginning a trial of electric buses in Joondalup. The trial vehicles will be supplied by Volvo, following a \$549 million bus supply contract which was awarded in March 2019. As part of the contract, Volvo buses, in partnership with Volgren Australia, is supplying 90 buses a year for five years. They intend to manufacture the buses in Perth eventually, creating job opportunities.
- Many argue that trackless trams or electric buses could provide fast, efficient transport to Woden now without the astronomical costs, damage and traffic disruption of Stage 2 Light Rail.

### ***3.4 Business Case for Stage 2 A Light Rail***

- The ACT Auditor General found that the business case for Light Rail Stage 2 A relied too heavily on so-called “transformational projects”, around the transport corridor. He recommended that a fresh break down of the benefits of the next stage of the light rail development should be made available to the public as the earlier one failed to show how the line would be a catalyst for urban development.
- The audit also found that Major Projects, the agency which prepared the Business case did not request supporting information from its consultants that showed what assumptions and calculations had been made to assess the costs and benefits of the project.

### ***3.5 Heritage***

- The NCA has responsibility for the heritage impacts to Commonwealth Avenue Bridge and City Hill. The NCA is responsible for the aesthetic value of the central city area as well as impacts on the heritage of the Parliamentary Zone by the Light Rail itself and the adjacent development along Commonwealth Avenue. There is nothing in the National Capital Plan to provide guidance. Any heritage reports, apart from the GML report of the raising of London Circuit, for all the future Light Rail Stage 2 works should be prepared and provided for public comment prior to any EPBC Referral.
- Routing the light rail across Commonwealth Bridge will also result in the removal of all the heritage trees along Commonwealth Avenue on the south side of the Lake (confirmed by the NCA) – yet another cost of this project.
- The area for development is within the Designated Area, the Heritage study by GML which noted all the relevant heritage policies and also that no HMP has been prepared for Canberra’s National Roads and this development area is a confluence of national roads and traffic.
- The grade separation of London Circuit and Commonwealth Avenue is an important and historic part of Canberra’s early urban infrastructure and should not be destroyed.
- The raising of a component of London Circuit upsets the existing iconic planning of the area and creates an unbalanced image against City Hill with ugly retaining walls. Parkes Way and its clover leaf entrance/exits are an historic product of city planning of the 1960s. The unbalanced development impacts the geometrical balanced planning noted as a key attribute in the GML Proposed Raising of

London Circuit Heritage Impact Assessment 2021 that also notes this as a high risk (p39).

- In his submission, Jack Kershaw noted the important introduction of Parkes Way, a critical east-west traffic element in the evolution of the city, of which the City Hill clover leaves are natural and essential components. We agree with his statement that the parkway and the clover leaves enhance the vital open space character of the Central National Area, and co-exist superbly. We also agree that the arrangement must not be destroyed, and certainly not to facilitate (highly intrusive) property development.

## Conclusion

LBGG recommends that the NCA rejects this proposal based on the comments above and advise the ACT Government to investigate alternate transport systems such as electric buses and trackless trams.

If the ACT Government persists with light rail then the NCA should insist that it examine the case in detail for alternate routes to the one over Commonwealth Bridge which does not seem to be the best route for commuters and one which causes massive traffic disruption.

- **Temporary works on Vernon Circle:**

Rejected

- **Signalisation of traffic at the intersection of Parkes Way and Coranderrk Street:**

Rejected



Irene Davies

Convenor

24 December 2021