

# Griffith/Narrabundah Community Association Inc.

PO Box 4127, Manuka ACT 2603

www.gnca.org.au

email: info@gnca.org.au

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Mr Andrew Smith  
Chief Planner  
National Capital Authority  
GPO box 373  
CANBERRA ACT 2601  
DCP@natcap.gov.au

Dear Mr Smith

## **NCA KINGS AND COMMONWEALTH AVENUES DRAFT DESIGN STRATEGY**

The Griffith Narrabundah Community Association (GNCA) welcomes the opportunity to comment on the National Capital Authority's (NCA's) Kings and Commonwealth Avenues Draft Design Strategy (Draft Design Strategy, DDS). The GNCA has over 200 members and services an area with about 2,000 dwellings.

### **Recommendations**

The GNCA:

- finds the DDS deeply disturbing;
- notes that the DDS as currently written
  - completely ignores the critical transport role of both Avenues, and the likely social impacts and costs of restricting traffic on either avenue;
  - fails to dispel the impression that the principal driver of these proposals is to free up land for further property development;
- believes that
  - if this is not the case the NCA needs to provide a more compelling and rigorous case in support of its proposal;
  - the current DDS should be immediately withdrawn in light of the above;
  - if the NCA wishes to continue to pursue these proposals it should
    - commission a thorough and comprehensive cost benefit analysis of the impact of all the proposals put forward
    - and completely rewrite the DDS to take into account all costs and losses of amenity likely to be imposed on Canberra residents as a result of the policies
  - before claiming public support for the proposal the NCA should engage a credible organisation to conduct a peer-reviewed social cost benefit analysis, as well as a statistically robust opinion survey.

Indeed, the GNCA considers that installation of a pedestrian underpass at the northern end of Commonwealth Avenue bridge to replace the Regatta Point crossing traffic lights would be far more beneficial to the community than the NCA proposal. .

## **Context and background**

As the seat of the national Government, Canberra plays an important symbolic role in the civic life of Australia. Its layout and vistas provide the background in which the nation's most important public events take place. The Commonwealth and Kings Avenues are important contributory elements. As the Draft Design Strategy states "*Kings and Commonwealth avenues serve an important ceremonial and symbolic role by connecting key areas, including Parliament House (on Capital Hill), City Hill (Civic), Anzac Parade and Russell Defence Precinct.*" (p. 1)

Moreover, besides being the "seat of Government", Canberra is also home to 400,000 permanent residents. Besides their ceremonial role, the two venues play an equally important role as transport arteries linking the suburbs and the people of the city.

Canberra is divided roughly into halves by the east to west flowing Molonglo River, which is dammed to form Lake Burley Griffin in the centre of the city. Civic, the commercial centre of Canberra, is located north of the lake. Parliament and most of the National Institutions and the central agencies of government are located south of the lake.

The partition of the city makes it essential that transport links between the two parts facilitate travel as efficiently as possible. Any unnecessary impedance risks a lop-sided long-term evolution of the city, with important facilities effectively stranded on one side or the other. The situation is analogous to the stunted growth of towns where internal access is impeded by railway lines.

Only four major roads currently connect the north and south of Canberra: the Tuggeranong and Majura Parkways, Commonwealth Avenue; and Kings Avenue. Commonwealth Avenue provides a direct link between Civic and Parliament House on Capital Hill. Its extension via Adelaide Avenue provides access to the southern and eastern suburbs of Canberra.

Commonwealth Avenue is Canberra's busiest road (see section below on slowing traffic flows), carrying about 67,000 vehicles per day (vpd), while Kings Avenue carries about 36,000 vpd, so they move a combined daily total of about 103,000 vehicles across the lake. In contrast, the Tuggeranong Parkways carries only about 59,000 vpd, the Majura Parkway about 30,000 vpd, and Northbourne Av about 41,000 vpd. Clearly both avenues are integral and important elements of Canberra's transport network. Any constraint on their traffic-carrying capacity would significantly affect the lives of Canberra residents, including those currently using alternative routes.

## The Draft Design Strategy

The Draft Design Strategy states on its first page that *“the avenues’ ... character has been eroded by the increasing dominance of vehicular traffic”*, and *“seeks to restore their status as boulevards that are both memorable and functional”* and proposes to remedy this, by amongst other things, *“the prioritisation of pedestrian amenity through the re-structuring of the road verge and intersection treatments”* and *“ensuring that avenues are flexible enough to accommodate future sustainable forms of transport”*.

In light of these failings, the DDS *“seeks to boldly redefine systems of circulation, accessibility (sic) and landscape structure, thereby improving both the general amenity of the avenues and the ways in which people understand and use the National Triangle.”* All this is sanctified by the ritual invocation of the Griffin name. At times the writer draws on rhetorical flourishes like *“The vision for Kings and Commonwealth avenues is to transform them into destinations and landmarks in their own right.”* (p. 14).

The hyperbole employed by the author(s) ignores the reality that avenues, even great ones, exist to move people from point A to point B. At about 2 km in length, the Commonwealth and Kings Avenues are both far too long to be realistically described as a destination or a landmark. It is similarly misleading to conjure up the spirit of restoring the Commonwealth and Kings Avenues to some state of past mythical greatness.

The NCA proposal appears to involve a significant amount of rebuilding of the avenues, as *“The renewed avenues will retain a consistent wide median and pedestrian verge on both sides. The verges will ... [comprise] ... a paved pathway on the outer (roadside) edge; a variable zone for lawns, paving, gardens, fountains and public art; and an inner path that extends spatially to adjacent building forecourts. Overlaying this template will be a formal grid of trees, further enriched by lighting, street furniture, gardens, public art, and signage and wayfinding information.”* (p. 19)

Both avenues are to have wider than existing dedicated bicycle paths, and the lane widths may be varied to accommodate a tram line, further impeding traffic. There are to be *“reconfigured intersections, new avenue tree plantings, (and) wide pedestrian walkways.”* A critical part of the proposals is to change the way the avenues work as roads by removing the existing clover leaf on and off ramps and replacing these by traffic lights, allowing the imposition of a rectangular road grid adjacent to the avenues.

In addition, other steps will be taken to explicitly slow vehicular traffic. The DDS indicates that the following:

*“intention is to reduce the speed on both avenues to 60 kilometres per hour by:*

- *narrowing lane widths for the central and median lanes*
- *removing the dedicated right-turn lanes and replacing them with shared right-turn and through-traffic lanes*

- *removing the left-turn slip lanes and replacing them with shared left-turn and through-traffic lanes*
- *tightening the geometry of the kerb returns to achieve a more urban feel to the avenues*
- *adding new signalised intersections, thereby reducing the speed for traffic and increased crossings for pedestrians*
- *replacing on and off ramps with more conventional urban intersections that reduce approach and departure speeds.*(p46)

While the above steps are taken “*Commuter cyclists are to be accommodated on-road through a wide dedicated cycle lane extending along:*

- *the full length of Kings Avenue on both carriageways*
- *the full length of Commonwealth Avenue on the eastern side, and from Vernon Circle to Coronation Street on the western side.*

*Slower, recreational cyclists will be accommodated on the avenue verges within the shared paved footpath zone.”* (p. 49)

The Draft Design Strategy appears to have been written by a landscape architect, and a lot of attention is given to the inadequacies of the current tree plantings along both avenues, and how this could best be remedied. Pedestrians and cyclists are to be encouraged through improved cycle ways and footpaths and changes to the road user hierarchy (which apparently means slowing vehicular traffic), with the explicit objective (p. 46) of reducing traffic volumes. Where traffic is mentioned it is to criticise its impact on urban design (an arguably reasonable complaint), for example “*the sections north of Lake Burley Griffin are open and visually dominated by traffic and carparks. In effect, traffic takes precedence; the avenues are difficult to cross, and the environment is neither pedestrian nor cyclist friendly*” (p. 10).

There is no recognition or analysis of the role that Commonwealth and Kings Avenues play in uniting a city cut in two by a lake. Neither is there any analysis of the likely maximum share of traffic on either avenue likely to be on foot or on bike. National institutions at present are spread out along the southern shore of the Lake, and the majority of pedestrian tourist traffic is likely to be between these institutions themselves and with the Old and new Parliament Houses located further from the Lake. It is most unlikely that anything other than a very small proportion of pedestrians in either the Parliamentary Triangle or Civic would seek to use the bridges to get to the other side of the Lake, and this proportion could be expected to shrink further with the advent of the tram. The distances are too long (~2km from State Circle to Parkes Way for both Avenues, and a further 350m or so from Parkes Way over City Hill to the start of Northbourne Avenue. And Canberra’s climate is often not conducive to walking – far too often it is too hot or too cold, especially when looked at through the eyes of someone from outside Canberra.

Cycling is a worthy activity, but it needs to be recognised that it is never going to be as popular as it is in European cities such as Amsterdam or Copenhagen. These are compactly laid out cities built on a human scale, and built on very flat land (often formerly

swampland). And the requirement that bike riders must wear a helmet effectively precludes any spontaneous decision to use a bike rather than another form of transport by either local employees or visiting tourists.

### **Consequences for Land releases**

Quite why the changes advocated in the Draft Design Strategy should be regarded as desirable is never clarified explicitly, but there are hints. It appears that proposed changes to the avenues will free up significant land for release to commercial interests:

*“Currently, the dominant characteristic of the avenues are thoroughfares for vehicles. Their role as landscaped corridors has only been partially realised. ... the density of buildings within the National Triangle, and in the areas lining the avenues, have been slow to develop. Buildings sit in isolation and the public realm is overwhelmingly dominated by surface car parking.”*

But *“as the avenues evolve, and their key symbolic role in the Griffin Plan and the National Triangle is strengthened, so too will their importance as desirable street addresses. Their renewal will encourage development both at Acton and Russell and within the Parliamentary Zone.”*(p. 14)

and *“The design strategy makes provision for a new suite of intersections and roads to open up new sites for future development and increasing the density of buildings and activity within the Parliamentary Zone.”* (p. 28)

The Draft Design Strategy foresees a significant increase in buildings along both avenues as *“• Commercial and residential uses will be extended from the city centre to Lake Burley Griffin, ...*

- Within the Parliamentary Zone, new development is likely to include new civic and institutional buildings fronting Kings and Commonwealth avenues.*
- In Russell, provision will be made for new buildings fronting Kings Avenue.”* (p. 16)

The Draft Design Strategy is quite explicit that at least some of this future development will be a direct result of changes to the road system, particularly in regard to Commonwealth Avenue.

*“By reconfiguring the intersection of Commonwealth Avenue and King Edward Terrace, new sites can be created”* (p. 34) and *“By reconfiguring the road intersections north of the lake to remove the existing high-speed free-left turns and replace them with signalised intersections, the avenue template will be established along the northern section of Commonwealth Avenue. Pedestrian and cycle use will be greatly improved, and new sites for mixed-use development within West Basin will be made possible.”* (p. 36)

All in all, the strong emphasis on opportunities for increased property development consequent on implementation of the policies proposed in the Draft Design Strategy might lead the cynical reader into thinking that the real driver for this proposal is not a burning desire to implement the Griffin vision (or at least a vision attributed to him), but to allow the

Commonwealth and ACT Governments to profit from the sale of land that is currently unusable because of cloverleaf off and on ramps.

### **Pros and Cons of the Proposed Changes**

A fundamental weakness of the Draft Design Strategy is that it does not canvass the benefits of the proposed changes, nor their likely costs. The author(s) of the DDS appear to simply assume that improved pedestrian and cycling access is a “good thing” and therefore any action which increases these things should be supported without any consideration of the actual effects on the Canberra community as a whole. And any revenue from the sale of NCA land would presumably accrue to the Commonwealth and be used for general expenditure rather than being of direct benefit to the residents of Canberra.

There is also an implicit assumption that more trees along the avenues will provide a pleasant landscape. However, increased density of buildings will simply degrade the sense of “space” that currently generates the ambience and sweeping vistas around the lake and parliamentary triangle. Construction of dwellings on both sides of the avenues will dramatically reduce these views, to the extent that good views may only be available from the bridges, which form about 15% of the length of each avenue.

Implementing the strategy would be inordinately expensive. The major engineering works required to remove the clover leaf ramps, their replacement by traffic lights, construction of inner and outer pathways, associated lawns, paving, gardens, fountains, public art, lighting, street furniture, and signage. The opportunity cost to society of forgone future education, health and other facilities and amenities would not be insubstantial. The direct social costs of increased traffic congestion along the avenues have been ignored, but would be a very real impost on Canberra residents.

Further, the DDS is completely silent on heritage issues and does not seem to consider that anything it proposes may conflict with the preservation of existing heritage. This is a matter well beyond our expertise, but we wish to flag the existence of the problem.

### **Impact of Slowing Traffic Flows**

According to Roads ACT (1 July 2017) Commonwealth Avenue is Canberra’s busiest major thoroughfare, carrying over 30,000 vehicles per day in each direction (66,000 total). This traffic will tend to seek alternatives if travel times are increased. However, there is an implicit and unrealistic assumption in the NCA’s proposal that much of the vehicular traffic along Commonwealth Avenue will be able to find alternative routes. Given that travel across the Kings Bridge is also to be slowed, it is not clear what alternative nearby routes might realistically be available.

Further, interdiction of vehicular traffic appears to be assumed to generate pedestrian and bike usage. The fallacy, of course, is that there is a lack of major mutual ‘attractors’ between Civic and Parliament House. It is probable that most current vehicular movements are through traffic, with trip origins or destinations located elsewhere in the suburbs of Canberra.

Surprisingly, the authors of the DDS appear to have totally ignored the negative aesthetic impact of the likelihood of snarled traffic banked up around Capital Hill or back to Parliament House. Cyclists and pedestrians would hardly welcome breathing in the noxious emissions produced by slow moving vehicles. One would be forgiven for thinking that the authors of the DDS are either impractical dreamers or have deliberately whitewashed obvious negative aspects of their proposals.

The closest that the NCA comes to dealing with traffic is to acknowledge that “*each day more than 20,000 cars, buses and trucks travel along Commonwealth Avenue alone*”. Not only does this reveal a disappointingly narrow view of the world and the community’s interests by the authors of the DDS, but the figure is less than a third of the traffic volume cited by Roads ACT. It is therefore difficult to have much confidence in a proposal that does not even use correct factual information.

There is another error at p. 11 of the DDS, where the diagram “Existing Road Hierarchy & Speed” suggests that both Avenues have speed limits of 70 to 80 kmh down their entire lengths. Commonwealth Avenue has a maximum of 70kmh between Parkes Way and State Circle, while King Avenue has a limit of 60kmh between State Circle and the bridge, and 70kmh from there to Parkes Way. These errors might suggest that the NCA has done little research into traffic flows on either Avenue and possibly does not fully appreciate the impact of its proposals on the Canberra community.

It is therefore incumbent on the NCA, as the proponent, to make publicly available a detailed explanation of how current access across Canberra will be affected by its proposal. In particular, there is a need for the NCA to provide a rigorous and credible social cost-benefit analysis in support of its proposal.

It would be prudent, to say the least, for the NCA to delay further consideration of its proposal until a final decision has been made by the ACT Government on the route of the tram from Civic to Woden. It would be preferable for the NCA to focus its efforts on ensuring that the tram does minimal damage to the existing amenity of parkland, roads and views in the vicinity of the lake and that the NCA has the capacity to require remediation of any damage that does occur.

## Consultation

The Draft Design Strategy suggests that the proposed changes have already been the subject of public consultation:

*“Community consultation has been a part of the development of the background issues and the Kings and Commonwealth Avenues Design Strategy. An earlier consultation process gathered feedback from relevant experts, professional associations, community organisations, the ACT Government and the general public. There was broad support for the renewal of the avenues and the key issues that have been incorporated into this design strategy include:*

- a streetscape character that highlights the avenues as destinations as well as through routes*
  - a consistent ‘design language’*
  - the need for the National Triangle to look and feel connected*
  - the selection of appropriate tree species and the need for a sustainable tree planting environment*
  - changes to the road user hierarchy with improved provisions for pedestrians and cyclists.”*
- (p. 9)”

This appears to be a reference to the NCA’s consultation process undertaken over 19 working days between 28 May and 28 June 2013 on the Have Your Say website. A Media Release was distributed on Monday 3 June 2013 (a week into the consultation period) announcing the commencement of the consultation and inviting comment on the report *Renewal of Kings and Commonwealth Avenues - Background and Issues* (Background and Issues Report). This is a 52 page document produced by the NCA in May 2013 which buries the recommendations to slow traffic on the avenues (“test the impacts of reducing the speed zone”) and removing the clover leaf ramps (“Plan to phase out the cloverleaf entry/exit ramps”) as dot points 23 and 28 amongst 35 unnumbered dot point recommendations, of mostly motherhood statements. We have considerable doubts whether the proposed changes to the avenues can be appropriately described as “testing the impact” of anything. Testing connotes being able to return to the earlier state if the test result is not positive.

This elicited 15 written submissions and 46 electronic posts. The written submissions came mainly from architectural organisations or groups such as Pedal Power. There appear to be few from individual respondents and none from community groups apart from those associated with lobbying for cyclists. A survey of respondents on Time to Talk was also conducted. The Background and Issues Report does not give the actual number of respondents but acknowledges that there were less than 100 responses. It would be fair to say that the consultation was not extensive, and the respondents not particularly representative of Canberra's residents or motoring organisations like the NRMA.

The GNCA would be concerned if the outcomes of such an inadequate survey process were used to defend and justify a set of policy proposals that do not appear to have been fully

thought through. Some at least of the proposals appear to ignore many of the major consequences of their implementation, with unnecessarily unpleasant impacts on the residents of Canberra.

We doubt that anyone would object to proposals to improve the trees along either of the Commonwealth or Kings avenues. Similarly, we doubt that many would object to improving facilities and amenity for pedestrians, although it needs to be acknowledged that there will never be a large number of pedestrians using either avenue to get from one side of the lake to another. The bridges themselves are quite lengthy (Kings 270m, Commonwealth 310m), and the need to cross the extensive parks on either side of each bridge makes it even further (Kings Av 1,040m from Bowen Drive to Parkes Way; Commonwealth Av 1,030m from King Edward Tce to Parkes Way). Lining the avenues with office buildings where there are now parklands will not reduce these distances, but just make the walk less attractive.

Clearly the as yet undetermined route of the proposed tram to Woden, and the number of trees that must consequently be removed, could have a much greater visual impact on whichever Avenue is affected, than most of the changes proposed in the Draft Design Strategy. It might be better for the NCA to reserve its efforts to ensuring that the tram does minimal damage and that the NCA has the capacity to adequately remediate any inevitable damage that occurs.

While the Canberra public has been fairly tolerant to date about surrendering road space to cyclists, it would not be unreasonable to wonder if this would extend to giving up an entire lane on either avenue. The social cost of a dedicated bike lane on either bridge is certainly not zero. It is highly likely that popular and largely seasonal enthusiasm for bike paths would face more opposition if all road users were made fully aware of the details of the NCA proposals.

If the NCA wishes to obtain an honest read-out of public views about its proposals it should commission a reputable opinion polling organisation to design and conduct a statistically robust survey of the ACT population, as well as focus group studies to explore the issues in greater depth. It would obviously be essential for any survey to fully inform respondents of the specific proposals before seeking opinions.

## **Conclusion**

The residents of Canberra deserve something better than the current DDS from the NCA.

The Draft Design Strategy should be withdrawn immediately.

If the NCA wishes to continue to advocate for any of the changes put forward in the DDS, it should thoroughly rework it, taking into account all the costs and decreases in amenity that

these changes might be expected to impose on Canberrans. A rigorous social cost benefit analysis of the impact of all the proposals put forward is absolutely essential.

Anything less would mean that the NCA would forfeit any right to be taken seriously by the residents of Canberra.

Yours sincerely

A handwritten signature in black ink that reads "Leo Dobes". The signature is written in a cursive, slightly slanted style.

Leo Dobes  
President  
3 July 2017