SUBMISSION ON THE WORKS APPROVAL FOR THE RAISING OF LONDON CIRCUIT



The Public Transport Association of Canberra (PTCBR) welcomes the opportunity to make a submission to the works approval applications associated with the project to raise London Circuit.

PTCBR supports the ACT Government's investment in this project, which is a key enabling work for the future delivery of Light Rail Stage 2. PTCBR considers the proposed works have the potential to make a positive impact on both the public realm and the broader transport network.

With that said, there are several aspects of this project which PTCBR believe fall short of the objectives outlined in the National Capital Plan's *City Hill Precinct Code*. This project is a rare opportunity to revitalise the City Hill precinct, and it would be unfortunate to miss out on a number of key measures identified in the plan which would help realise its vision of a vibrant and connected City Hill and London Circuit.

PTCBR are available to discuss any of the matters identified in this submission further if required.

Additional bus priority measures would reinforce London Circuit as the main public transport circuit for Canberra City

Recommendation 1 – Major Projects Canberra and Transport Canberra should consider:

- 1. placing additional bus stops either on Commonwealth Avenue or on London Circuit to the immediate east of the new intersection, and
- 2. including a bus priority turning lane from Commonwealth Avenue northbound onto London Circuit.

The City Hill Precinct Code states that:

- London Circuit should operate as the main public transport circuit for Canberra City.
- Redevelopment of the City Hill Precinct should take place in the context of an integrated public transport plan. Mechanisms should be introduced to give priority to public transport.

While the project's *Traffic and Transport Impact Assessment* states that its benefits include "the opportunity to improve public transport priority",¹ the project as currently contemplated does little to support public transport along London Circuit, other than to facilitate the future delivery of Light Rail Stage 2.

PTCBR understands that London Circuit will continue to play an important role for bus transport after the commencement of light rail services to Woden. While light rail is planned to travel along the western side of London Circuit, the eastern side will presumably continue to be utilised by rapid bus routes servicing Barton and Weston Creek, and suburban bus routes servicing the Inner South.

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¹ Traffic and Transport Impact Assessment, page 127.

Canberra's rapid bus routes comprise the city's long-term framework for public transport. Their continued presence and reliability is required to provide certainty for businesses, employers and individuals to make long term decisions on where to live, work and invest in the ACT.² It would be inconsistent with the objectives of the *City Hill Precinct Code* to allow this project to proceed without the inclusion of priority measures to support rapid bus services that utilise London Circuit.

PTCBR suggests two relatively modest treatments in furtherance of these objectives.

First, there is a need for additional bus stops to serve the planned residential and commercial developments around the new intersection, as well as the existing poorly served precinct around QT and NewActon. The current plans make no allowance for this, other than the planned light rail stop, leaving the closest bus stops over 800 metres away at the Legislative Assembly.

PTCBR proposes that additional bus stops be constructed either on London Circuit to the east of the new intersection (see <u>Figure 1</u>, blue) or on the southern side of the intersection on Commonwealth Avenue (see <u>Figure 1</u>, red). These stops should be of a suitable length to accommodate multiple buses, as per the existing stops on London Circuit.

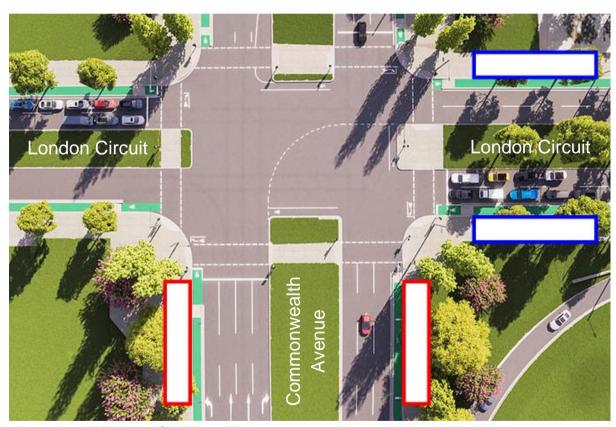


Figure 1: Possible locations for additional bus stops

Secondly, earlier concept drawings of the new intersection featured a bus priority right turn from Commonwealth Avenue northbound onto London Circuit (see <u>Figure 2</u>) similar to the priority measures at the intersection of Barry Drive and Kingsley Street. This feature would significantly

² www.transport.act.gov.au/act-transport-strategy/where-we-want-to-be/world-class-public-transport-for-acompact,-efficient-city/

improve the speed and reliability of bus services along London Circuit east following the removal of the south-east cloverleaf on City Hill.

A corresponding bus priority left turn from London Circuit westbound into Commonwealth Avenue would also be worth investigating, however PTCBR acknowledges the potential impacts this slip lane might have on pedestrian and civic amenity.



Figure 2: Bus priority turning lane on Commonwealth Avenue

Both treatments suggested by PTCBR would support the eventual goal of having public transport priority measures along the full length of London Circuit, consistent with the objectives of the *City Hill Precinct Code*.

The expected impacts on bus services are acceptable, but should be closely monitored

Recommendation 2 – The Transport and Traffic Liaison Group should monitor the impact of the construction works on bus times and be prepared to implement additional bus priority measures if the delays become unacceptable

The project's *Environmental Assessment* and *Traffic and Transport Impact Assessment* note that the construction works will delay bus services by 1-2 minutes. The main mitigation measure is to reroute northbound bus services around Vernon Circle and through Constitution Avenue, supported by a temporary bus-only lane on the northern loop road.

PTCBR accepts that the construction works will cause some delays to bus services and considers the northbound diversion to be a sensible way of mitigating this impact. If the assessment remains accurate, delays of 1-2 minutes are an acceptable price to pay to support the delivery of an improved public realm and future public transport project.

PTCBR notes, however, that the project's assessment is significantly more optimistic than the forecasts provided by the ACT Government's Disruption Taskforce, which assume that the capacity of Commonwealth Avenue will be reduced by 80 per cent during construction (see Figure 3).³

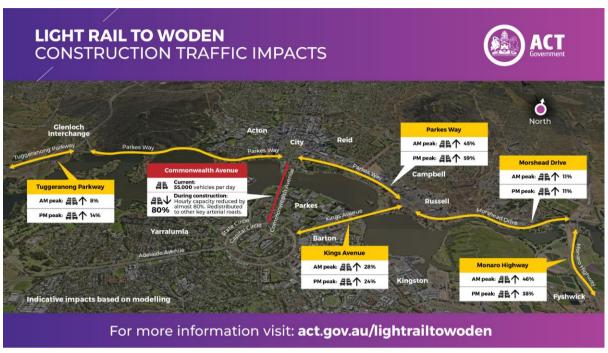


Figure 3: Anticipated traffic impacts during construction

In response to those forecasts, PTCBR has called for the consideration of significant bus priority measures, such as making Commonwealth Avenue bus only, in order to maintain the flow of people into Canberra City.⁴ Such measures may not be necessary under the more recent modelling undertaken for this project, however the Transport and Traffic Liaison Group (TTLG) should continue to monitor bus travel times and take action if they deteriorate significantly, consistent with the proposed T7 and T10 mitigation measures.⁵

In the event more radical solutions are required, the TTLG could consider more interim measures, such as additional bus priority around London Circuit, rerouting some services away from the Legislative Assembly bus stops, or running additional services which avoid running through Canberra City (e.g. Belconnen to Woden via the Tuggeranong Parkway). Quick and reliable bus services are one of the best ways to mitigate traffic problems during the works, however excessive delays to public transport would encourage passengers to return to their cars and aggravate the situation.

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³ www.act.gov.au/lightrailtowoden/traffic-disruptions/disruption-maps

⁴ www.ptcbr.org/2021/08/08/why-commonwealth-avenue-should-be-bus-only-during-light-rail-construction/

⁵ Environmental Assessment, pages 78-79.

The pedestrian and cycling treatments are high quality and should be replicated across the rest of London Circuit

Recommendation 3 – Major Projects Canberra and Transport Canberra should consider:

- 1. relocating the feature wall elements proposed for Commonwealth Avenue to minimise the inconvenience to pedestrians, and
- 2. constructing permanent pedestrian crossings across Vernon Circle to City Hill.

The City Hill Precinct Code states that:

- New development, including public spaces, will facilitate pedestrian connectivity and bicycle
 movements within the City Hill Precinct and between the City Hill Precinct and Canberra
 Central.
- New road connections to Vernon Circle from Constitution and Edinburgh Avenues should facilitate access for local traffic and pedestrians.

PTCBR applauds the project's focus on pedestrian and cycling connectivity around the new intersection, with wide footpaths and segregated cycling lanes, and hopes this will be replicated along the rest of London Circuit and Commonwealth Avenue as part of future light rail works.

However, the location of the proposed feature wall elements appear to be designed to add "friction" to east-west pedestrian movements across Commonwealth Avenue (see <u>Figure 4</u>, circled). This is highly undesirable from a pedestrian connectivity perspective and should be reconsidered.



Figure 4: Location of feature walls on Commonwealth Avenue

There is also a risk that the project will leave City Hill as an isolated traffic circle and a hostile environment for pedestrians and cyclists. It is unclear why the recently completed Edinburgh Avenue extension did not include a pedestrian crossing, given the clear expectations outlined in the *City Hill Precinct Code*. There is an opportunity as part of this project to avoid repeating the same mistake.

As a first step to activating City Hill, PTCBR believes that thought should be given to making permanent the temporary pedestrian crossing on the Vernon Circle northern loop road. There is also an opportunity increase the extent of the works and construct a pedestrian crossing at the nearby intersection of Vernon Circle and Edinburgh Avenue, which would provide a much-needed east-west cyclist and pedestrian route that reflects the desire lines across the City Hill precinct