

SUBMISSION ON THE DEVELOPMENT APPLICATION FOR JOHN GORTON DRIVE STAGE 3C (DA 202037798)



The Public Transport Association of Canberra (PTCBR) would like to express its profound concern with the proposed design of the final stage of John Gorton Drive (Stage 3C).

If approved in its current form, PTCBR believes that this project risks undermining the future effective operation of public transport in the Molonglo Valley.

To mitigate this risk and ensure that the project is consistent with established ACT Government planning documents and transport commitments, PTCBR recommends that the following two design changes be required as conditions of approval:

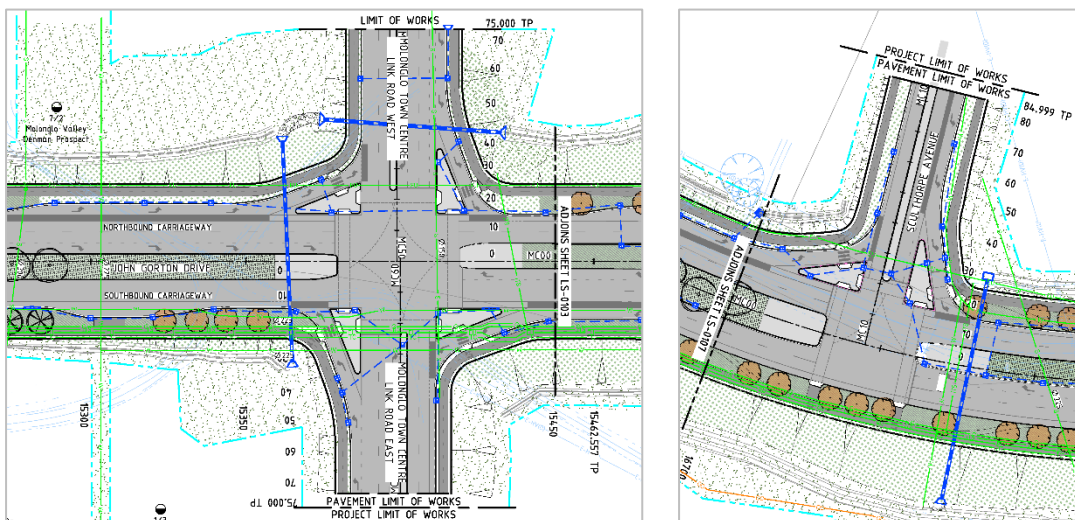
1. The intersections featured in John Gorton Drive Stage 3C should be modified to include public transport priority measures consistent with the design of John Gorton Drive Stages 1 and 2A.
2. The section of John Gorton Drive Stage 3C adjacent to the Molonglo Group/Town Centre should continue the established urban design character of John Gorton Drive Stage 2A.

These recommendations are outlined in more detail below.

1. Public Transport Priority in John Gorton Drive Stage 3C

- The proposed designs of the new intersections included in John Gorton Drive Stage 3C (John Gorton Drive/Sculthorpe Avenue and John Gorton Drive/Molonglo Town Centre Link Roads East and West) do not include public transport priority measures. This is shown in [Figure 1](#).

Figure 1 - John Gorton Drive Stage 3C Intersections – Molonglo Town Centre (left) and Whitlam (right)



- In attempting to justify this deliberate omission, Jacobs Engineering Group (the consultants) appear to have either misunderstood or misrepresented the extent and purpose of the public transport priority measures that have been incorporated into the existing stages of John Gorton Drive.

- This is best illustrated by the consultants' claim that public transport priority measures are not needed for John Gorton Drive Stage 3C, as they were not included in Stages 2A or 3B:

"No bus jumps have been provided in JGD2A or JGD3B so will not be considered for JGD3C to ensure consistency along the carriageway"

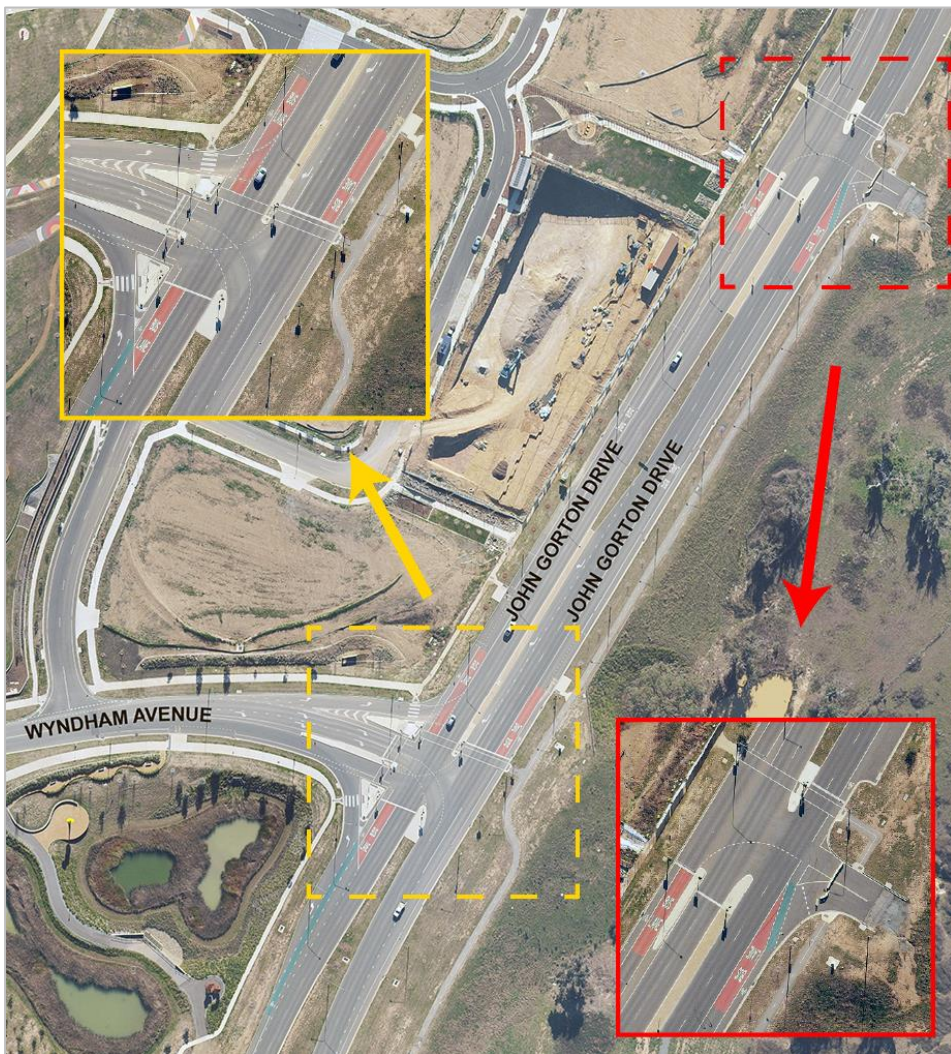
(DA202037798, SUPP-202037798-COMMENTS-01, page 6)

- Explanations outlining why this statement is misleading, and why it should not be accepted as a legitimate justification for the absence of public transport priority measures in John Gorton Drive Stage 3C, are outlined below.
- A breakdown of the various stages of John Gorton Drive Stage is provided at [Appendix A](#).

Claim #1: There are no public transport priority measures included in John Gorton Drive Stage 2A

- It is factually incorrect to state that there are no public transport priority measures included in John Gorton Drive Stage 2A.
- A cursory examination reveals that a number of public transport priority measures have been incorporated into John Gorton Drive Stage 2A. These are shown in [Figure 2](#).

Figure 2 - John Gorton Drive Stage 2A Public Transport Priority Measures



- These measures have been designed to facilitate the diversion of the future rapid public transport corridor off John Gorton Drive to connect with a transport interchange embedded in the Molonglo Valley Group/Town Centre.¹
- This intention is described below and illustrated in [Figure 3](#) and [Appendix B](#).

“Dedicated bus lanes are provided along JGDE [Stage 2A] between Pond Road [Wyndham Avenue] and Commercial Street to facilitate access to the Group Centre via Commercial Street. Bus priority measures are provided at the following intersections on JGDE [Stage 2A]:

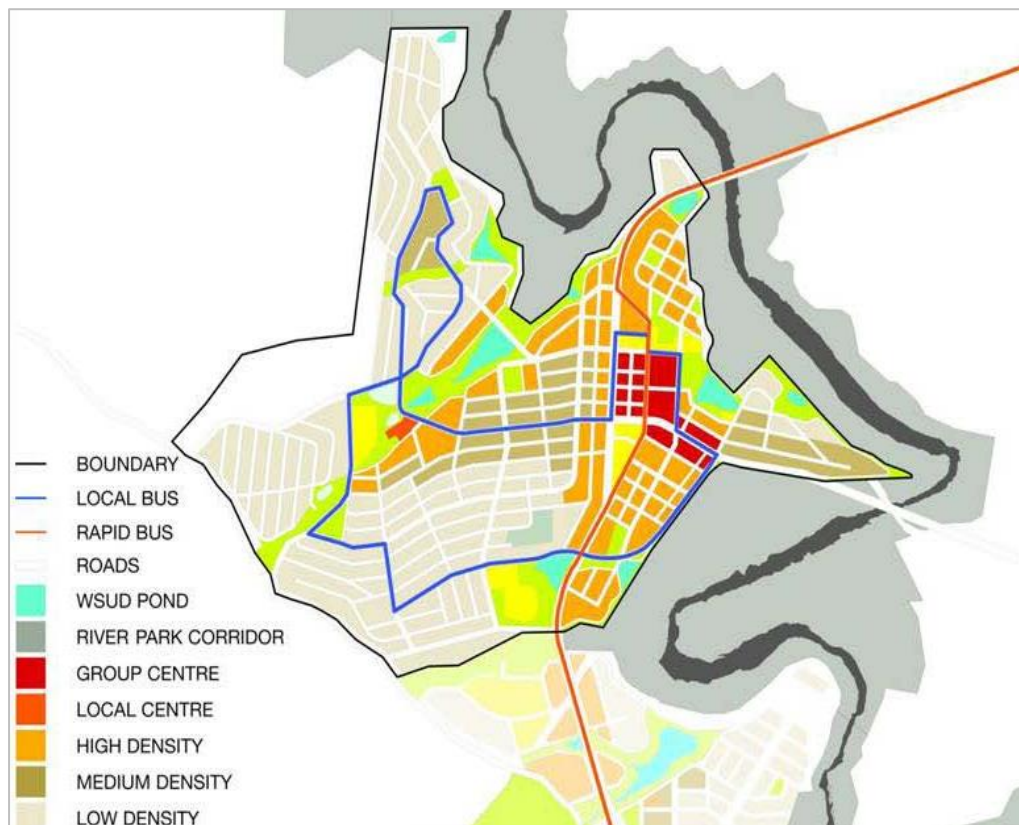
- *Pond Road intersection.*
- *Commercial Street.*

A dedicated and separated kerbside bus lane at Commercial Street has been proposed to allow flexibility for buses to turn right or continue straight through the intersection. This proposal has been discussed and accepted by Roads ACT.

[The future transport interchange] can be accommodated in the vicinity of [the] Group Centre Precinct as suggested in the PDF document and ACT Strategic Public Transport Plan.”

(John Gordon Drive Extension to Molonglo 2 - Forward Design - Document Readiness Report, Brown Consulting, 2012, page 31, emphasis added)

Figure 3 - Molonglo Valley Stage 2 Planning and Design Framework - Public Transport Plan



¹ Molonglo Valley Stage 2 Draft Planning and Design Framework – Report of Community Engagement (ACTPLA, 2010), page 9.

- Further correspondence contained within the Stage 3B DA indicates that the absence of priority measures in the Stage 3B intersection can be attributed to a desire by ACT Government agencies to retain maximum flexibility in determining the final alignment of the BSE and its connection to John Gorton Drive.³
- The final BSE alignment was confirmed in February 2019 with the release of the *Molonglo Valley Stage 3 Planning and Design Framework* (Molonglo 3 PDF).⁴
- There is no suggestion within the Stage 3C DA or any other contemporary planning documentation that the BSE intersection with John Gorton Drive has changed from the location identified in the *Molonglo 3 PDF*.
- The absence of public transport priority measures in Stage 3B, which are evidently a product of planning uncertainty which has since been resolved, should therefore not be accepted as reasonable justification for the absence of public transport priority measures in Stage 3C.

Claim #3: Public transport priority measures cannot be included in John Gorton Drive Stage 3C because they would interfere with a future light rail corridor

- In addition to the statement dissected above, the consultants also claim that the inclusion of public transport priority in Stage 3C could potentially complicate (but not prohibit) the construction of light rail in approximately twenty years' time:⁵

*"Bus priority could be provided but this would require the existing carriageway to be expanded into the future proofed light rail median. This would also cause issues on the approach to the bridge and the design around the Sculthorpe Avenue intersection will be difficult to tie-in to. **This also poses a significant risk to the implementation of future light rail. The rapid corridor, hypothetically, would require removal or relocation which would add significant cost and disruption to a fully operational dual carriageway arterial road.** As such, to remain consistent with the constructed sections of JGD, Jacobs recommendation is to leave the alignment unchanged for the PSP."*

(DA202037798, SUPP-202037798-COMMENTS-01, page 6, emphasis added)

- However, this claim is undermined by subsequent claims contained within the entity comments report that Stage 3C, as designed, will still require significant modification to facilitate a future light rail corridor:

*"Dedicated right turn bays are provided within the median of JGD which has been space proofed for future light rail. It is noted that approval has been given for the right turn bays to be provided within the median in the 'short term'. **However, should the provision of light rail proceed the right turn bays will need to be either removed or relocated off the LR alignment. If diamond turns are to be retained in a future light rail scenario, dedicated right turn bays will need to be provided. This will have a significant impact on the layout of the Molonglo Town Centre Link Road and Whitlam Centre Link Road intersections.** Future proofing the corridor for light rail should also mean that equal consideration is given to the impacts on and needs of other road user groups. For example, if a diamond turn needs to be retained due to there being limited alternative routes, there will be insufficient separation between the opposing turns once the right turn bays are shifted laterally by 3-3.5 metres."*

(DA202037798, SUPP-202037798-COMMENTS-01, page 6, emphasis added)

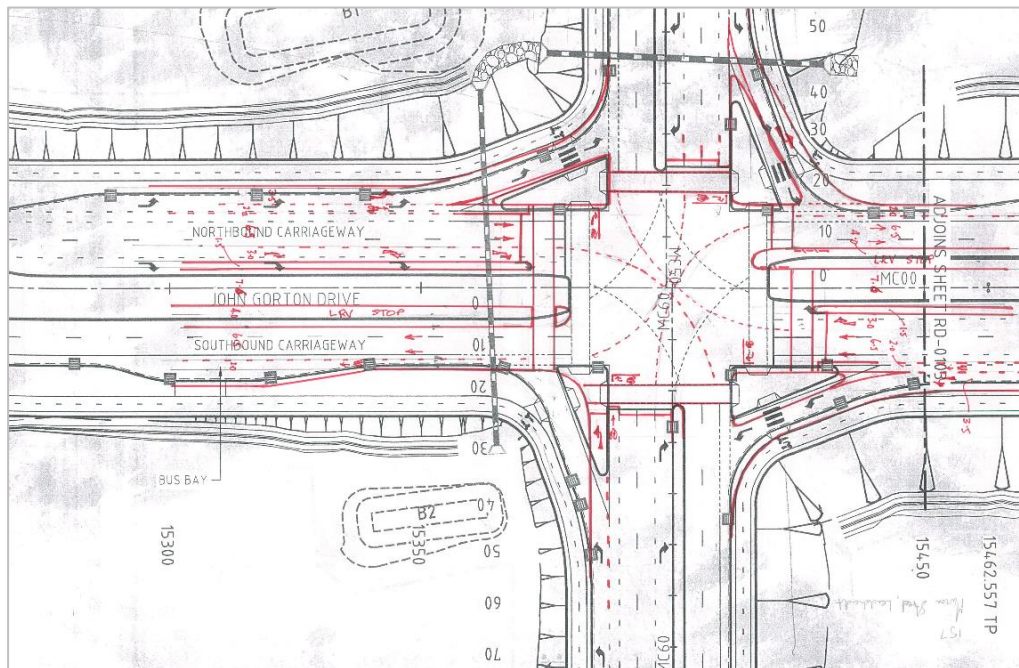
³ DA201834154, ENTITYADVICE-201834154-CORRESPONDENCE-2-01, page 2.

⁴ *Molonglo Valley Stage 3 Planning and Design Framework* (EPSDD, 2019), page 13.

⁵ *John Gorton Drive Stage 3C - Preliminary Sketch Plan Design Report*, (Jacobs Group Australia, 2020), page 11.

- The required changes were illustrated in the *John Gorton Drive Bridge and Road Construction Works - PSP Third Party Peer Review (WSP, 2020)* and are reproduced in [Figure 6](#).⁶

Figure 6 - Stage 3C intersection modifications required to facilitate future light rail



- It is PTCBR’s considered view that future complications associated with as-yet unfunded proposals for a hypothetical light rail corridor are not a sufficient reason to justify the denial of fast, frequent, reliable and safe public transport outcomes for residents of Molonglo for up to two decades, especially when such complications will inevitably be encountered regardless of whether public transport priority measures are included in the original build.
- This reasoning therefore should not be accepted as an adequate justification for the absence of public transport priority measures in Stage 3C.

Inconsistency with established Molonglo Valley planning documentation

- In addition to the misleading statements outlined above, the proposed design for John Gorton Drive Stage 3C is also inconsistent with key planning documentation for the Molonglo Valley.
- The *Molonglo 3 PDF* requires that the IPT corridor between John Gorton Drive and Bindubi Street/William Hovell Drive:

“ensures that public transport has priority such as consideration of bus priority intersections and dedicated transit carriageway (bus and rapid public transport)”

(Molonglo Valley Stage 3 Planning and Design Framework, EPSDD, 2019, page 21, emphasis added).

- It is evident that no effort has been made to ensure that public transport has priority on John Gorton Drive Stage 3C. Indeed, such elements have been deliberately omitted.

⁶ *John Gorton Drive Bridge and Road Construction Works - PSP Third Party Peer Review (WSP, 2020)*, page 33.

- As the *Molonglo 3 PDF* is required to be taken into consideration in the determination of development applications,⁷ the DA for John Gorton Drive Stage 3C should not be approved without the incorporation of public transport priority measures.

Inconsistency with key transport objectives outlined in ACT strategic planning documents

- At the heart of the *ACT Infrastructure Plan*, the *ACT Planning Strategy 2018*, the *ACT Climate Change Strategy 2019-25* and the *ACT Transport Strategy 2020* is a commitment by the ACT Government to prioritise public transport and active travel as a deliberate investment strategy to encourage sustainable transport outcomes.
- Specific actions articulating this commitment are outlined in the *ACT Climate Change Strategy 2019-25*:⁸
 - Prioritise improving public transport services and supporting infrastructure, including buses, light rail stage two and connecting services. (Action 3.4)
 - Trial and evaluate innovative approaches to planning and development that prioritise active travel and public transport (Action 3.12)
 - Investigate and implement options for encouraging a shift to public transport and active travel through planning and a smarter approach to parking. (Action 3.15)
 - Explore and implement new approaches to improving the productivity of key transport corridors through prioritisation of public transport and/or active travel (Action 3.16)
 - Investigate options for dedicating a greater proportion of road space and public realm space to sustainable transport modes (Action 3.18)
- This approach was also outlined in the initial planning work done for Molonglo Valley Stage 2:

*“Design of the north-south and east-west arterial roads and local streets will consider the needs for public transport and local residential access. **The design of the streets will give priority to pedestrians, cyclists, public transport and then other vehicles.**”*

(Considerations for Molonglo Valley Stage 2 Planning and Design Framework – Movement and Access, ACTPLA, 2010, emphasis added)

 - The proposed design of John Gorton Drive Stage 3C undermines this commitment by giving the highest priority to other vehicle traffic, with minimal provision for active travel and zero measures to prioritise public transport.
 - To ensure consistency with key transport objectives outlined in ACT strategic planning documents, the design of John Gorton Drive Stage 3C should be modified to include public transport priority measures.

Why should John Gorton Drive Stage 3C include public transport priority measures?

- The existing stages of John Gorton Drive south of the Molonglo River (Stages 1A, 1B, 1C, 1D and 2A) feature public transport priority measures at key intersections. This is illustrated in [Appendix D](#).

⁷ *Molonglo Valley Stage 3 Planning and Design Framework* (EPSDD, 2019), page 5.

⁸ *ACT Climate Change Strategy 2019-25* (ACT Government, 2019), 2019, pages 8-9.

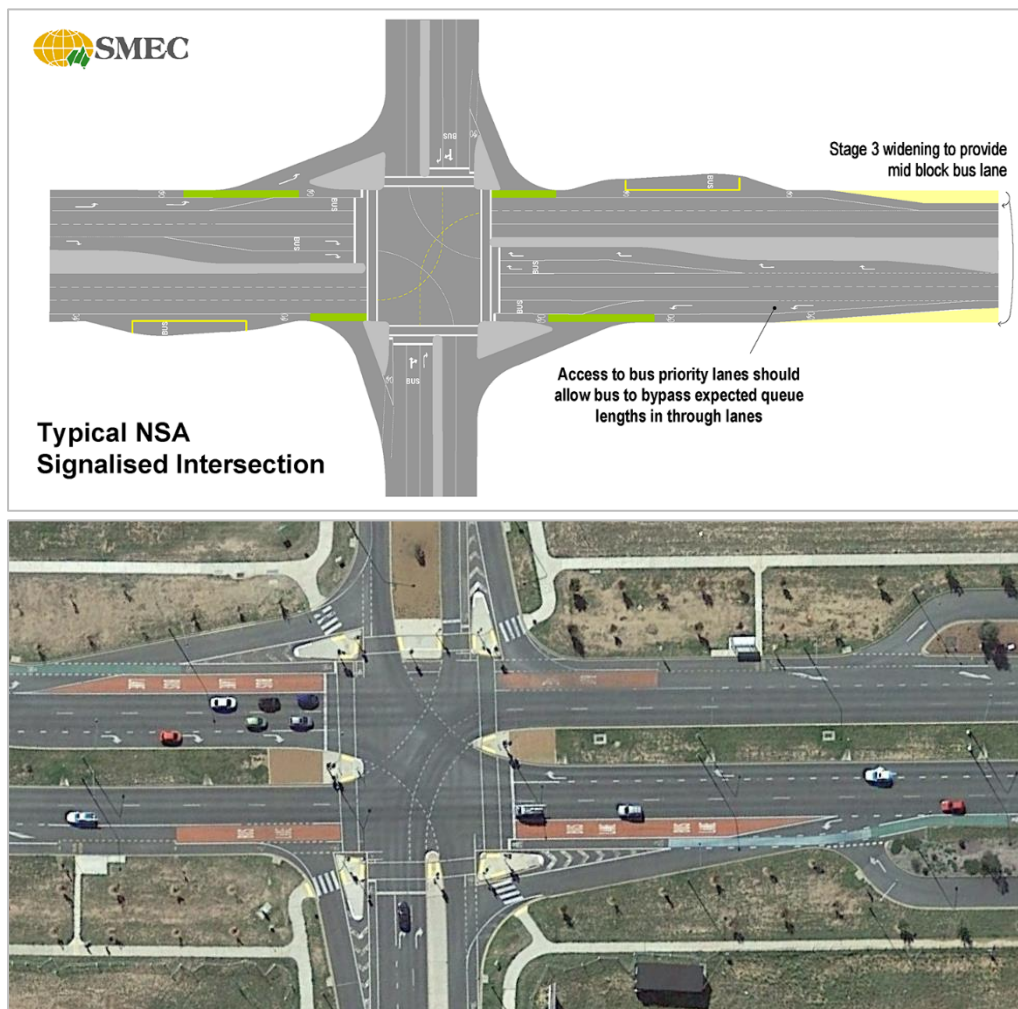
- This is consistent with the recommendations of the *ACT Strategic Public Transport Network Plan* (McCormickRankinCagney, 2009) and the *Molonglo Roads Feasibility Study* (SMEC, 2008) as outlined below and illustrated in [Figure 7](#).⁹

“On the North-South Arterial, Rapid buses can operate in a kerbside lane with these features:

- *The lane is designed so that it can be made bus-only on approach to signals, with a queue bypass at the signal.*
- *The lane is identified in policy as one that can be converted to bus-only if/when operating speed standards require it.*
- *A pocket lane for left-turning traffic is provided on the near-side of intersections, so that queuing left-turning traffic does not block the bus. The length of this pocket should depend on modelling of turning movements at the intersection.”*

(ACT Strategic Public Transport Network Plan, McCormickRankinCagney, 2009, page 120)

Figure 7 - Typical Intersection for John Gorton Drive – Recommended (top) and Delivered (bottom)



⁹ Molonglo Roads Feasibility Study (SMEC, 2008), page 8-16.

- The *ACT Strategic Public Transport Network Plan* explains that this arrangement is necessary to protect the speed and reliability of vehicles operating along the Molonglo IPT corridor,¹⁰ with the presence of reserved lanes at intersections being identified as the “minimal requirement for effective operation” of the corridor.¹¹
- Evidence that supports this assertion is provided in the *Molonglo 3 Road Network Scenarios Modelling Technical Note* (SMEC, 2017). As illustrated in Appendices E and E, the report’s traffic modelling shows significant congestion on John Gorton Drive and the BSE in 2031 and 2041. The report also states that substantial increases in public transport patronage will not be achieved unless public transport priority is provided along the full length of the IPT corridor.¹²
- The *Molonglo 3 Roads FDR* reveals that 35 buses per hour (one bus every 1 minute and 43 seconds) will be operating along John Gorton Drive and the BSE.¹³ It is difficult to see how reasonable reliability and speed could be achieved with this volume of buses operating on congested roads without public transport priority measures.
- By excluding public transport priority measures from John Gorton Drive Stage 3C, the proposed design is likely to damage the speed and reliability, and therefore the attractiveness, of public transport in the Molonglo Valley.
- As this outcome is clearly contrary to established ACT Government transport objectives to encourage sustainable transport use, the proposed design for Stage 3C should be modified to include public transport priority measures.

2. Urban Design Character of John Gorton Drive Stage 3C

- The existing section of John Gorton Drive Stage 2A north of the “Commercial Street” intersection possesses a number of distinct urban design characteristics designed to reinforce the transition from a higher speed “arterial” environment to a lower speed “precinct” environment adjacent to the future Molonglo Town/Group Centre.¹⁴
- These features include the use of smart/multi poles (alternating 12 and 6.5 metre Fyntrim ‘Canberra Prestige’ decorative columns), parallel parking bays with landscaped blisters and a narrower 7 metre median. These are illustrated in Figure 8.

¹⁰ *ACT Strategic Public Transport Network Plan* (McCormickRankinCagney, 2009), page 118.

¹¹ *Ibid*, page 119.

¹² *Technical Note: Molonglo 3 Road Network Scenarios Modelling* (SMEC, 2017), page 35.

¹³ *Feasibility Design Report - Molonglo 3 Road Access and Molonglo River Bridge, John Gorton Drive (North) and Bindubi Street Extension (West)* (AECOM, 2015), page 33.

¹⁴ *John Gordon Drive Extension to Molonglo 2 - Forward Design - Document Readiness Report* (Brown Consulting, 2012), page 37.

Figure 8 – Smart Poles and Parallel Parking Bays on John Gorton Drive north of Commercial Street



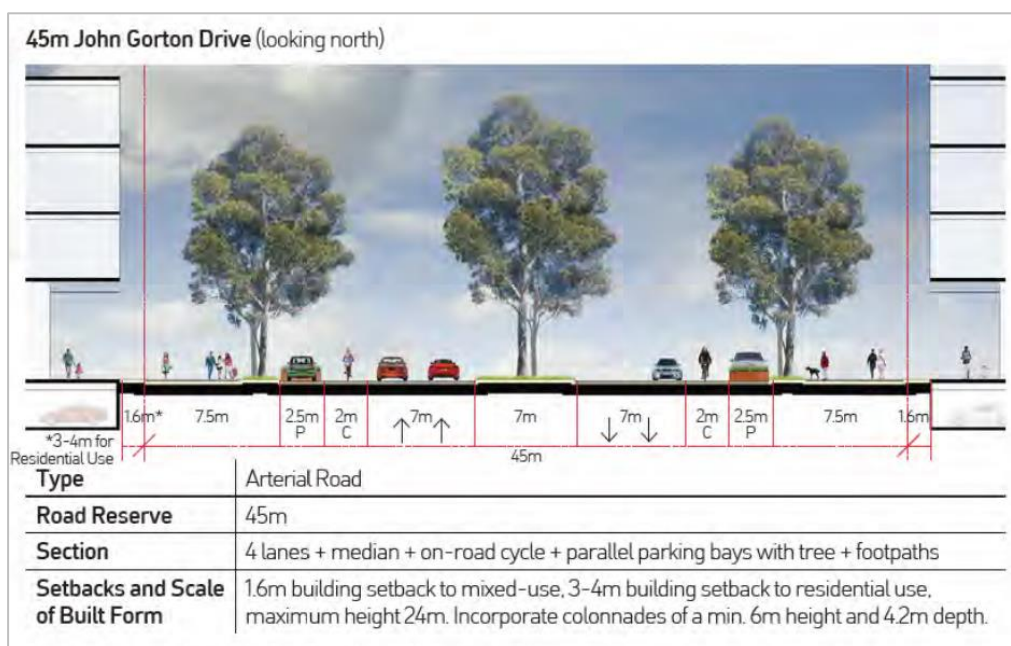
- The reasoning behind the inclusion of these features is articulated in the *Molonglo Valley Stage 2 Group Centre and Environs Planning and Design Framework – Urban Design Component* report, as reproduced below and illustrated in [Figure 9](#).¹⁵

“Urban design principles for street character, street activation and street interface objectives clearly set out ensure John Gorton Drive is an address street where adjoining mixed-use developments will front the street. On-street activity will promote pedestrian connectivity between the Group Centre Core and the surrounding environs, to reduce the effect of the roadway as a car-dominated barrier between surrounding neighbourhoods. It is recommended that large street trees are planted and parallel parking is permitted to support street activity and support the initial stages of business and residential establishment.”

(Molonglo Valley Stage 2 Group Centre and Environs Planning and Design Framework – Urban Design Component, Hames Sharley, 2012, page 40)

¹⁵ *Molonglo Valley Stage 2 Group Centre and Environs Planning and Design Framework – Urban Design Component* (Hames Sharley, 2012), page 124.

Figure 9 - John Gorton Drive Group/Town Centre Interface - Cross Section



- These features are consistent with the ACT Government’s *Movement and Place Framework* as outlined in the *ACT Planning Strategy 2018*, which seeks to balance the dual function of streets of moving people and goods and enhancing the places they connect and pass through.¹⁶
- None of these features are included in the section of John Gorton Drive Stage 3C adjacent to the future Molonglo Town/Group Centre, located south of the John Gorton Drive/Molonglo Town Centre Link Roads intersection.
- To ensure consistency with the established character of John Gorton Drive Stage 2A and the ACT Planning Strategy’s *Movement and Place Framework*, the section of John Gorton Drive Stage 3C adjacent to the future Molonglo Town/Group Centre should retain the use of smart/multi poles, parallel parking bays with landscaped blisters and the narrower 7 metre median.

In summary, PTCBR believes that the proposed design of John Gorton Drive Stage 3C promotes a transport hierarchy that gives primacy to private motor vehicle traffic over public transport and other sustainable travel modes in a manner that is inconsistent with established ACT Government policy.

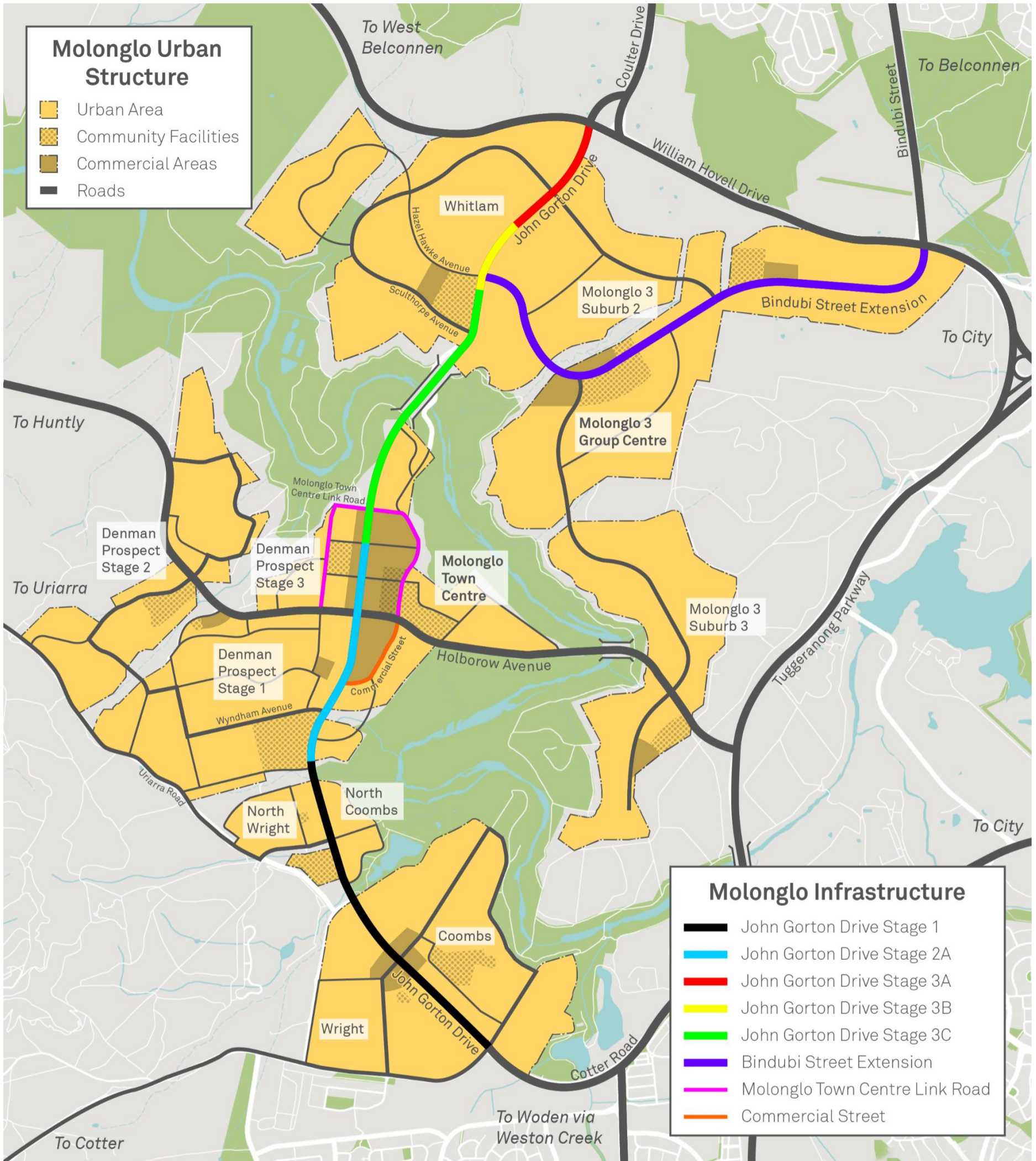
This issue can be rectified by the imposition of the approval conditions recommended in this submission.

Sincerely,

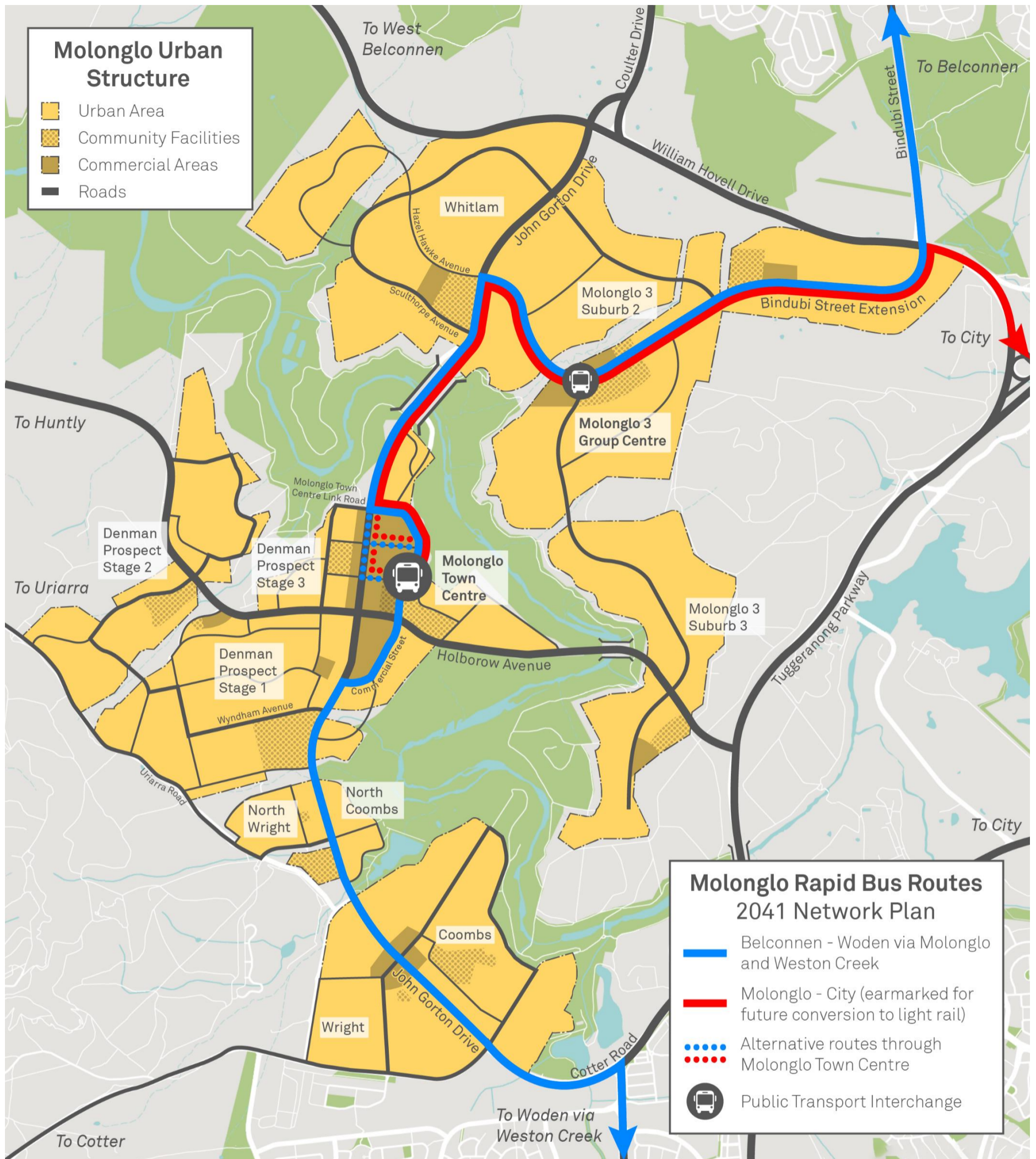
Ryan Hemsley
 Chair, Public Transport Association of Canberra
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¹⁶ ACT Planning Strategy 2018 (ACT Government, 2018), page 86.

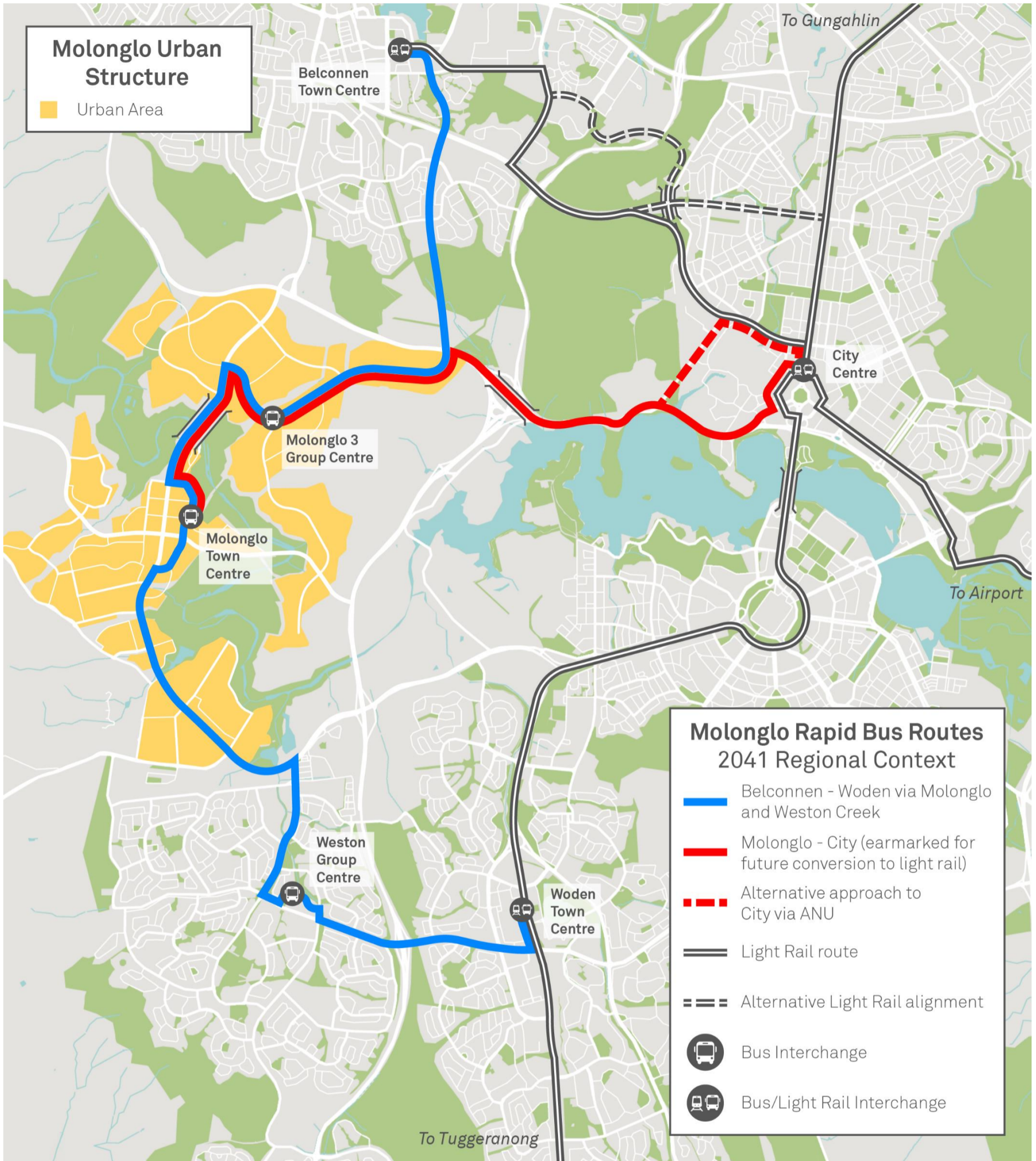
APPENDIX A



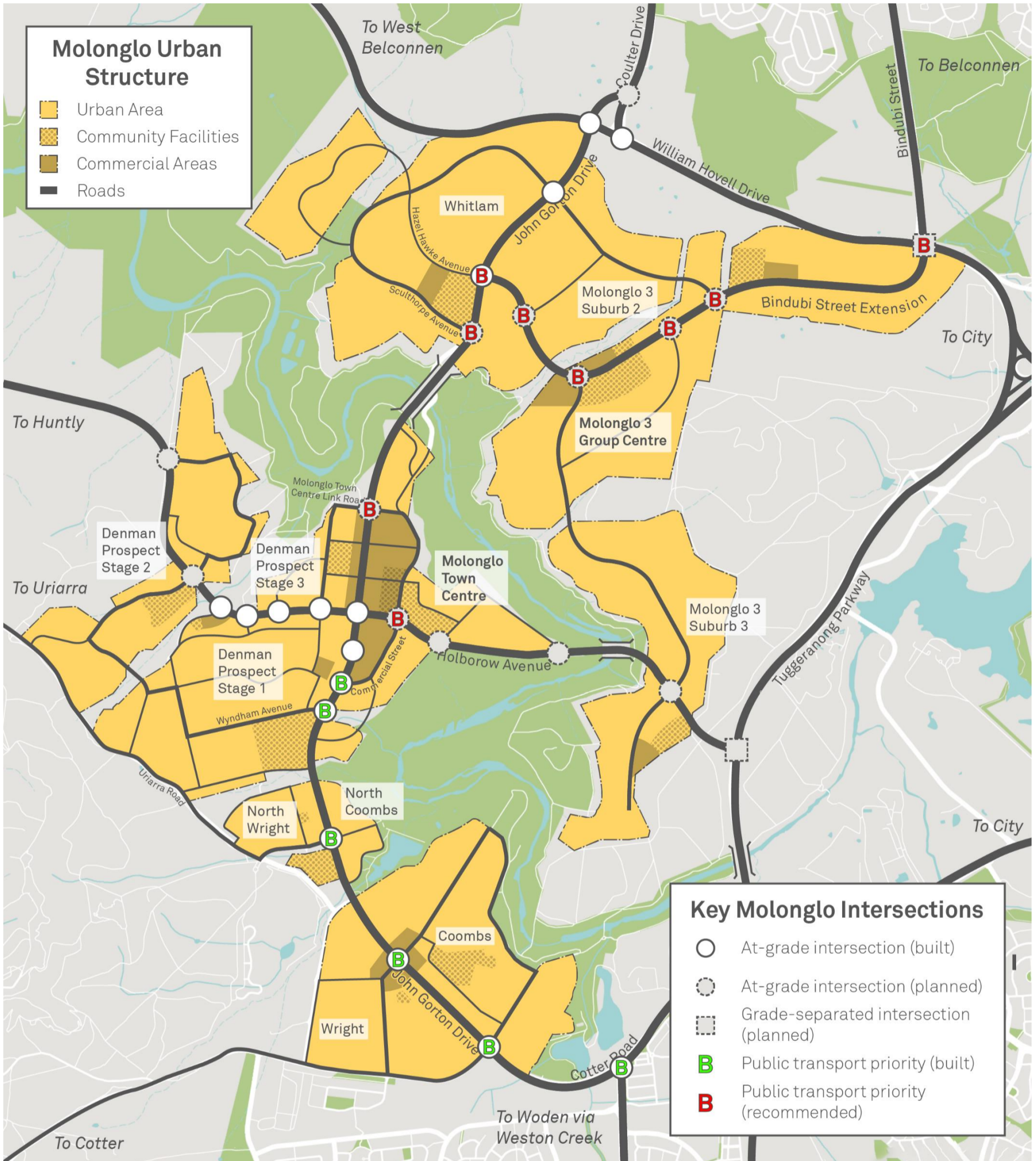
APPENDIX B



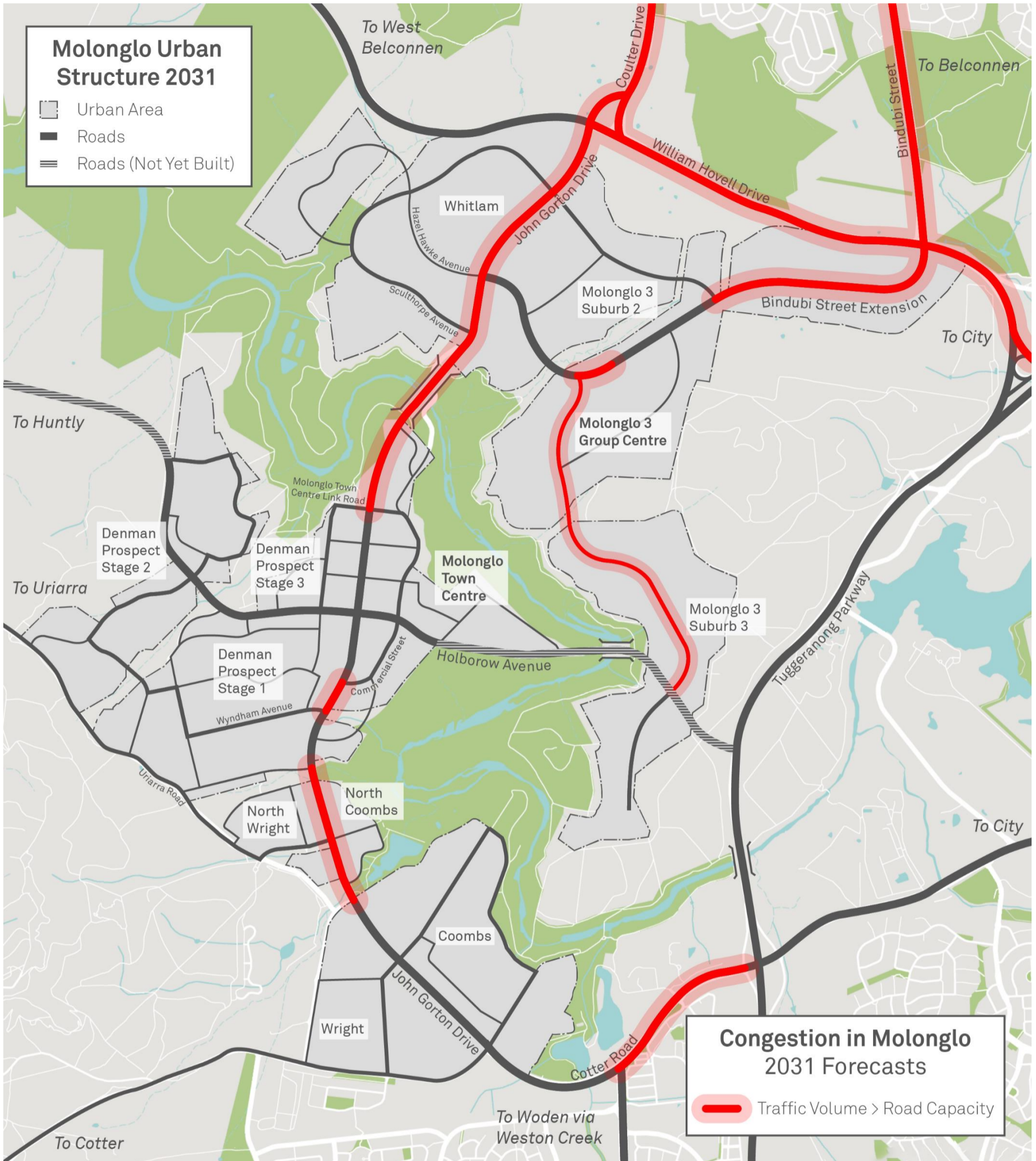
APPENDIX C



APPENDIX D



APPENDIX E



APPENDIX F

