



19 July 2017

Mr Malcolm Snow  
Chief Executive Officer  
National Capital Authority  
Via email: Plan.Review@natcap.gov.au

Dear Mr Snow

### **RE: Kings and Commonwealth Avenue Draft Design Strategy**

The NRMA welcomes the opportunity to provide comment to the Kings and Commonwealth Avenue Draft Design Strategy.

The NRMA provides motoring, mobility and tourism services to 2.4 million Members across the ACT, Sydney and regional NSW. The NRMA works with policy makers and industry leaders to advocate for increased investment in road infrastructure and transport solutions to make mobility safer, provide greater access to affordable and reliable transport services, and to support the growth and development of regional communities.

The NRMA values our strong working relationship with the Australian Government, and is committed to collaborating with government and industry to improve the productivity of our road network and develop solutions to the ever increasing problem of congestion and mobility for the people of Canberra and surrounding regions.

The importance of the road network in the ACT cannot be overstated. Roads are the arteries of modern day life and economic activity and are necessary for the efficient distribution of goods and services. In the next 20 years the population of Canberra will increase by a third, with over 500,000 people set to reside in Canberra by 2035. In order to accommodate this population increase and growth in transport movements, the ACT requires an effective road network and transportation system.

The NRMA welcomes a long term vision for Kings and Commonwealth Avenues – two arterial roads of national significance. In making this submission, the NRMA seeks to ensure the design strategy reflects current and future traffic flow, safe interactions between road users and the integration of the avenues with future light rail routes.

As a result, the NRMA's submission will focus on four key areas:

- Purpose of avenues
- Traffic flows
- Safe mobility, and
- Integrated public transport.

### **PURPOSE OF AVENUES**

The draft design appears to give equal weight to the stated principles of '[a] unified expression of the national triangle', '[h]igh-quality urban streetscapes, befitting their status and use', 'effective movement and connections for all' and a 'robust landscape character that is consistent and sustainable', with an attendant

shift from the purpose of the avenues as major arterial routes to 'functional public spaces' with a formal streetscape.

While Kings and Commonwealth Avenues are locally and nationally significant boulevards, they also provide an important transport link for residents and visitors between Civic and the Inner South, particularly the Parliamentary Triangle. While asserting that traffic currently takes precedence and a requirement for this to change, the draft design does not include the robust analysis of traffic volume and movements across both avenues required to support this view.

While the NRMA is supportive of improving public transport access and pedestrian and cyclist access across the lake, both avenues will continue to service large numbers of motorists. The design should ensure the avenues maintain their important roles as traffic routes first and foremost, while simultaneously improving their attractiveness and functionality.

The design has been informed by the Australian Government's road user hierarchy framework, which places private motor vehicles as the lowest priority for urban planning. However, currently Canberra has the second lowest usage of public transport and the highest car dependency of any Australian capital city.<sup>1</sup> The design in its draft form, which prioritises pedestrian, cyclist and public transport use, is aspirational rather than reflective of the city's transport movements. Considerable planning work and service improvements are required in order to encourage the shift to public transport outlined in the strategy, and the NRMA seeks to ensure that in the short-to-medium term this approach does not inadvertently penalise car users.

## TRAFFIC FLOWS & PARKING

The NRMA supports the Australian and ACT Government's efforts to reduce congestion by encouraging alternative forms of transport, however the design must allow for optimal traffic flow for motorists and adequate parking to support the anticipated increase in civic and institutional building fronting the avenues.

The ACT has the third highest passenger vehicle ownership rate per 1,000 population, with 83 per cent of residents in Canberra using their car to get to work.<sup>2</sup> As such, a priority for urban planning in Canberra must be the accommodation of motorists. As the Draft Design Strategy notes, more than 20,000 cars, buses and trucks travel along Commonwealth Avenue each day<sup>3</sup>, so ensuring the efficient flow of traffic along both avenues is of paramount importance.

The NRMA is concerned there is insufficient data to support the removal of on and off ramps to both avenues and the removal of loop roads on Kings Avenue. In the future, traffic density may reach a level that necessitates the consideration of these changes, but without detailed modelling, it is difficult to justify. Similarly, signalised intersections should only be added to the design when there is a clear road safety benefit for doing so, as excessive intersections will unnecessarily impede traffic flow.

As the ACT Government's acknowledges, 'adequate parking is crucial to ensure sustained growth, support development and provide access to goods and services.'<sup>4</sup> The strategy highlights high and rising parking occupancy levels, in conjunction with the ACT's rising population and car ownership levels, which means supply and demand for parking must be actively managed.

The draft design would benefit from a greater consideration of parking needs, so that adequate parking is available to support the employment growth and commercial activities of the area, including identifying

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<sup>1</sup> Australian Bureau of Statistics (2011) Census of Population and Housing, 'Australian Demographic Statistics 3101.0 Dec 2012'.

<sup>2</sup> Australian Bureau of Statistics (2014) *4102.0 Australian Social Trends*, July 2013, Car Nation.

<sup>3</sup> National Capital Authority (2017), *Kings and Commonwealth Avenues Draft Design Strategy*, Australian Government, p.1.

<sup>4</sup> Transport Canberra (2015) *Building an Integrated Transport Network (Parking) Strategy*, p.4.

potential sites for structured car parks nearby to meet short or long-stay parking needs. This is particularly pressing in the Parliamentary Zone, where employment is projected to increase by around 50 per cent between now and 2041, resulting in the intensification of transport and parking demand.<sup>5</sup>

The draft design strategy proposes that surface car parking is reduced in the area, particularly around Blamey Square. This approach places greater emphasis on improved pedestrian infrastructure, particularly where it is necessary to cross busy roads like Kings and Commonwealth Avenues. The proposed loss of 1410 parking spaces at Blamey Square, where demand around the suburb is generally at 95 per cent, will disadvantage motorists trying to access businesses in the surrounding areas, particularly workers in the Defence precinct at Russell.

These issues will need to be actively managed by the National Capital Authority. There are already parking shortages in the Barton, Parkes and Acton precincts. Where parking spaces are identified for removal, the NRMA recommends a review of options is undertaken to ensure spaces are replaced at convenient locations and at no cost to motorists.

## SAFE MOBILITY

It is important for all users of our roads, public transport networks, cycle lanes and footpaths are, and feel, safe as they go about their day-to-day activities getting from A to B. For the NRMA, safe mobility is about investing in road and public transport infrastructure, protecting vulnerable road users, encouraging safer driving and the purchase of safer vehicles.

As alternative modes of transport become more common for commuters and motorists, the ACT Government will need to invest in appropriate road safety measures to ensure all road users remain safe, including cyclists. Approximately 21.5 per cent of the ACT population cycle weekly, with 81,000 trips undertaken.<sup>6</sup> The ACT has the highest cycling rate in Australia, with 47 per cent of Canberrans indicating they had cycled on at least one occasion in the past year, compared to 37.4 per cent of Australians nationally.<sup>7</sup> As such, the NRMA supports the introduction of dedicated on-road cycle lanes along the full length of both avenues and expanded pedestrian and cycle connections over bridge.

The NRMA is aware that concerns for cycling and pedestrian safety have been previously identified on Commonwealth Avenue because of the lowness of the barriers separating these road users from often-heavy traffic, and welcomes current construction to improve this.

The redesign of the road verge for the avenues could improve pedestrian crossing, but placing pedestrians in the inner path to accommodate lawns and gardens in the central zone also has the potential to make pedestrians more vulnerable to cyclist and vehicle traffic. The NRMA would welcome additional detail regarding safety measures to prevent potential conflict and collisions between different road users in a shared road environment, particularly with the introduction of light rail in the future.

## INTEGRATED PUBLIC TRANSPORT

The NRMA is supportive of planning and investment in public transport that meets the needs of passengers and contributes to reduced traffic congestion. Integration of various transport modes will be crucial to improving the efficiency of passenger movements in the ACT. The NRMA is supportive of the ACT Government's 2015

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<sup>5</sup> Transport Canberra (2016), *Light Rail Network: Delivering a modern transport system for a growing city*, p.19.

<sup>6</sup> Australian Bicycle Council (2015), *2015 National Cycle Participation*

<sup>7</sup> Canberra Times (2014) Canberra the Cycling Capital of Australia, study finds <http://www.canberratimes.com.au/act-news/canberra-the-cycling-capital-of-australia-study-finds-20140724-zwf8p.html>



Integrated Transport Network vision of a more balanced mix between future passive and active transport, and supports its aim to improve safety and mobility while reducing traffic congestion.

The introduction of the Canberra Metro will provide an alternative mode of transport that will improve the passenger experience and reduce congestion and transport times by up to 30 per cent. In the context of the Parliamentary Triangle, its role is particularly critical, as this high priority corridor holds 60 per cent of all ACT jobs and connects central Canberra to this economic and employment precinct.<sup>8</sup> The Metro will also connect tourists to key cultural institutions such as the National Gallery of Australia, the National Library of Australia, Questacon, the National Archives of Australia, the National Portrait Gallery, the High Court of Australia and the Museum of Australian Democracy.

Key to the success of the Metro will be its integration with existing transport routes and service delivery, and planning should not take place in isolation from other transport developments, including bus services and park and ride facilities. Acknowledging that the stage 2 route is in the early design stages, the draft design strategy does not adequately address the role of the avenues as light rail corridors and the Parliamentary Triangle (including Civic, Russell and the Parliamentary Zone) as the centre of Canberra's public transport network, with the Gunghalin, Belconnen, Airport, Fyshwick and Woden corridors all converging on the Parliamentary Triangle.

The design refers to a consideration of 'the possible introduction of light rail' with 'lane widths capable of being reconfigured within the overall road width' and a suggestion that light rail stops could be located within the central median. It is also unclear whether it will be necessary for a lane of traffic to be closed on the chosen lane for the Metro route in order to accommodate light rail.

Before the design is finalised, further clarity on the integration of light rail is required to secure the capacity of both avenues to accommodate this significant transport mode once the preferred route for Stage 2 has been determined. A flexible design that allows for light rail is critical, as either Kings or Commonwealth Avenues will form an essential link in the route.

## CONCLUSION

The NRMA welcomes the opportunity to provide feedback on the draft Kings & Commonwealth Avenue design strategy. The NRMA seeks to ensure access to Kings and Commonwealth Avenues to motoring, cyclist and pedestrian traffic is sufficient to accommodate current and future traffic movements, as well as parking requirements and the appropriate safeguarding of both corridors for the accommodation of light rail. The NRMA would be happy to work with the project team to further discuss planning considerations for traffic flows, parking availability and related matters.

If you require any further information regarding this submission, please contact NRMA Regional Corporate Affairs Advisor, Helen Machalias, on 0439 133 114 or [Helen.Machalias@mynrma.com.au](mailto:Helen.Machalias@mynrma.com.au).

Yours sincerely

**MATT GIJSELMAN**  
**GENERAL MANAGER – PUBLIC AFFAIRS**

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<sup>8</sup> Transport Canberra (2015) *Light Rail Network: Delivering a modern transport system for a growing city*.