



**Australian Government**  
**National Capital Authority**

# Consultation Report

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Works Approval applications:

- WA102570
- WA102593
- WA102580

Works Associated with the raising of London Circuit  
between Edinburgh Avenue and Constitution Avenue

March 2022

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## Introduction

The National Capital Authority (NCA) received three separate works approval applications associated with the proposed raising of London Circuit, Canberra. The proponent for the applications is the ACT Government. The proponent has advised that the project is being undertaken to facilitate the sale and subsequent development of several undeveloped city blocks and to provide a path of travel for a future light rail system.

The three applications propose a range of changes to Canberra's traffic movements:

- WA102570 - Raising of London Circuit – involving the creation of an at-level four-way intersection at the junction of London Circuit and Commonwealth Avenue.
- WA102593 - Temporary works on Vernon Circle – involving the widening of the existing northern road loop to create a dedicated bus lane and separate vehicle lane, including new traffic signal lights; and
- WA102580 - Signalisation of traffic at the intersection of Parkes Way and Coranderrk Street to control right hand movements during the weekday morning peak traffic.

The NCA has previously approved works in relation to the raising of London Circuit. These include preparatory works such as surveys, relocation of Golden Sun Moth populations, soil core sampling, utilities relocations, and associated temporary fencing and structures.

Community consultation on the three applications was undertaken by the NCA between 30 October 2021 and 24 December 2021. The NCA received 126 public submissions. The NCA thanks each individual and organisation for their commitment to the consultation process and for providing their comments.

This Consultation Report outlines the NCA's review of the key issues raised during the consultation period and consideration of the works approval applications.

**Under the *Australian Capital Territory (Planning and Land Management) Act 1988*, the National Capital Authority (NCA) prepares and administers the National Capital Plan (the Plan) to ensure Canberra and the Territory are planned and developed in accordance with their national significance.**

The Plan sets out the broad planning framework for the Australian Capital Territory (ACT). Areas designated as having special characteristics of the National Capital are subject to detailed planning policies and guidelines.

Any buildings or structures, demolition, landscaping, or excavation works in Designated Areas require the approval of the NCA. The NCA considers such proposals in the context of the relevant provisions of the Plan.

The NCA received the Works Approval applications on the following dates:

- WA102570 – 8 October 2022
- WA102593 – 22 October 2022
- WA102580 – 12 October 2022

## Context

In September 2019, the ACT Government (the proponent) announced its plans to extend Canberra's Light Rail system from the City to Woden. Following this announcement the ACT Government has commenced developing detailed designs for the light rail route to Woden. The design work commissioned for Light Rail to Woden has not been presented in full to, or considered, by the NCA at this time. The Light Rail to Woden proposal (Stage 2A to Commonwealth Park or Stage 2B to Woden) does not form part of this consultation process.

The proponent is seeking approval from the NCA to raise London Circuit to become a four-way intersection. This project is being proposed to facilitate the development of a number of unused city blocks and to provide a path of travel for a future light rail system. The proponent has confirmed they see this project as an important stand alone initiative for the City Centre, but notes it is critical to put in place as soon as possible to support future transport initiatives including establishing the mechanism to lift light rail carriages onto Commonwealth Avenue and improving pedestrian and cyclist access and safety as they move to and from the City. A staged approach as proposed is not unusual or inconsistent with urban planning and development assessment processes aimed at meeting the needs of a growing city.

Amendments to the National Capital Plan in 2006, supported by both the ACT Government and the Australian Parliament, foreshadowed these and other changes to the City Centre, including the City Hill Precinct, Constitution Avenue and West Basin. These amendments followed a holistic urban design and planning study, known as the Griffin Legacy, undertaken by the NCA between 2002 and 2004. The project aimed to appraise the Griffins' plan and its relevance to the planning and development of Canberra in the 21st century, extend the legacy through a series of strategic initiatives to restore (where possible) the spirit and intent of the Griffins' plan, provide an integrated framework for planning initiatives in the central areas of Canberra and the approach routes, and protect the integrity of the Griffin Plan, recognising its stature as a work of both national and international significance.

The proponent is also seeking approval from the NCA to introduce traffic signals at the roundabout located at the intersection of Coranderrk Street and Parkes Way. The signals would operate during the weekday morning peak hour to align movements with traffic volumes. That is, the traffic lights will be used to ensure that the greatest volumes of traffic will have the highest movement priority. This project could occur independently of the raising of London Circuit but is considered to be a priority project for the proponent as signalisation will assist in management of the traffic disruption arising from the raising of London Circuit.

Relevant to the proposal to the raising of London Circuit and the creation of a four-way intersection at the junction of London Circuit and Commonwealth Avenue is the City Hill Precinct Code policy which states:

*'Major modifications to the existing traffic management arrangements are dependent upon the continuing implementation of peripheral parkways and city bypass routes including Gungahlin Drive, Majura Parkway, Clunies Ross Street, Fairbairn Avenue, Marcus Clarke Street and Cooyong/Ballumbir Streets and the removal of the Parkes Way cloverleaves.'*

The NCA's role is to carefully consider the works approval applications as presented by the proponent in the context of the requirements of the National Capital Plan. Other ACT Government processes have considered the purpose of the proposal, the overall budget and project management staging.

## National Capital Authority

The NCA is established by the *Australian Capital Territory (Planning and Land Management) Act 1988* (PALM Act).

The NCA's role is to ensure that Canberra is planned and designed in accordance with its role as the national capital and is a place for all Australians.

## National Capital Plan

The NCA prepares and administers the National Capital Plan (the Plan). The Plan sets out the broad planning framework for the Australian Capital Territory (ACT). Key objectives of the Plan are to:

1. Recognise the pre-eminence of the role of Canberra and the Territory as Australia's National Capital.
2. Further develop and enhance a Central National Area which includes the National Triangle and its setting, Lake Burley Griffin and its foreshores and the diplomatic sites and national institutions, as the heart of the National Capital.
3. Emphasise the national significance of the main approach avenues and routes.
4. Respect the geometry and intent of the Griffin's formally adopted plan for Canberra.
5. Maintain and enhance the landscape character of Canberra and the Territory as the setting for the National Capital.
6. Protect the undeveloped hill tops and the open spaces which divide and form Canberra's urban areas.
7. Provide a plan offering flexibility and choice to enable the Territory Government properly to fulfil its functions.
8. Support and promote environmentally responsible urban development practices.

The NCA assesses works approval applications and determines the consistency of the works against the Plan.

All works applications in Designated Areas are assessed against the Plan pursuant to Section 12 of the PALM Act. The three Works Approval applications are works that are located in Designated Areas and are therefore assessed against the relevant provisions of the Plan.

The Plan requires that any proposed activities defined as 'works' must be submitted to the NCA for works approval. Under the *PALM Act*, 'works' include:

- a) *the construction, alteration, extension or demolition of buildings or structures;*
- b) *landscaping;*
- c) *tree-felling; or*
- d) *excavations*

*but excludes anything done inside buildings or structures.*

Implementation of the Plan ensures that Canberra is a city worthy of its status as the national capital.

## Matters under consultation

The consultation process was undertaken to inform the NCA's consideration of the works as set out in the three Works Approval applications submitted by the proponent. The Light Rail to Woden proposal (Light Rail Stage 2A and Light Rail Stage 2B), does not form part of this consultation process although the proposal is clearly related to, and will facilitate, the future transport mode as selected by the ACT Government.

While the NCA encourages planning for future public transport needs, vehicle and pedestrian movements in Canberra by the ACT Government, this consultation process did not consider the proposed long term transport mode or alternatives or the cost of the proposed works. Such matters are not matters addressed by the National Capital Plan and therefore are *not* subject to the NCA's consideration. These matters are matters for the ACT Government.

The National Capital Plan requires that the heritage assessment of all proposals subject to NCA planning approval are assessed in accordance with the provisions of the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act).

In December 2019 the proponent referred Light Rail Stage 2A (including the proposal for raising London Circuit), to the Department of Agriculture Water and the Environment (DAWE) for its assessment under the EPBC Act. The Light Rail Stage 2A proposal was assessed under the controlling provision related to Listed Threatened Species and Communities and the environment of Commonwealth Land.

On 2 February 2021, the DAWE decision-maker approved the proposal, with conditions. A decision to vary the conditions of approval was granted by the decision-maker from DAWE on 23 December 2021.

## NCA Public Consultation Process

The community was alerted to the opportunity to review the proposal to raise London Circuit through online and print advertisements as part of the works approval process.

The NCA's *Commitment to Community Engagement* details how the NCA conducts consultation. The purpose is to achieve a greater level of consistency and transparency in the NCA's decision making process.

The *Commitment to Community Engagement* describes the minimum requirements for consultation, and the process by which works approval applications that are released for public consultation will be assessed. Part 2.7 'Works Applications and Attachment C Protocol for Development Applications for Works Which Require Consultation' of the NCA's *Commitment to Community Engagement* describe the consultation process for works approval applications.

The NCA assesses whether a proposal is consistent with the National Capital Plan and if it requires public consultation. An assessment is made in relation to impacts on:

- public space and community amenity;
- environment, heritage, or landscape values;
- amenity of the locality in terms of materials, finishes, scale, massing, design, and quality; and
- consistency with an existing Heritage Management Plan.

When an application for works is lodged and consultation is required, consultation with the community and stakeholders may be undertaken by the applicant, the NCA, or both. Where consultation is undertaken by the applicant, the NCA may choose to stipulate specific requirements that the applicant is required to implement.

## Public Consultation Details

Public consultation was undertaken on the proposal by the NCA between 30 October 2021 and 24 December 2021 in the following manner:

- Between 30 October 2021 and 24 December 2021, publishing details of the three Works Approval applications on the NCA's website.
- From Saturday 30 October 2021, the NCA arranged to have six (6) separate public notices published in The Canberra Times. The notices outlined the scope of the proposed works and details on how to make a submission to the NCA in relation to the proposal.
- From Monday 1 November 2021 to 24 December 2021, eight (8) A1 sized colour signs were installed in the road reservation of each road frontage to the sites.
- On 3 November 2021, the NCA emailed stakeholders advising of the consultation process and inviting comments.
- The NCA also notified details of the consultation on the NCA's Facebook page and Twitter.

The NCA's standard consultation requirements under the *Commitment to Community Engagement* require proposals to be notified for 15 business days (three weeks). In this instance, the NCA undertook extended consultation for the three Works Approval applications of 40 business days (eight weeks), reflecting the significant public interest in the future light rail project and the major changes the proposal will make to traffic conditions in central Canberra. The consultation process was also extended following a request for additional traffic modelling information.

The advertising media can be seen at [Attachment A](#).

## Submissions

Public comments/submissions were requested to be received via the NCA's website and 'smart form' from 20 November to 24 December 2021.

The NCA received a total of 126 submissions on the three Works Approval applications. Of these, 115 submissions were received through the 'Have Your Say' smart form on the NCA's website. There were 11 submissions received by mail/email that have been accepted and included for consideration. Submissions have been uploaded to the NCA website, unless submitters requested that they not be published. There are 90 submissions published on the website. Of the submissions received, 36 submitters did not consent to their submissions being published.

A list of names of submitters who agreed to be published is at [Attachment B](#).

## Analysis of Submissions – key data

In summary, the submissions revealed:

- Submissions in support of the proposal as presented = 18/126
- Submissions that did not support the proposal as presented = 96/126
- Submissions with mixed views/neutral/raising questions/providing suggestions = 12

## Key themes

Review of the community commentary in submissions regarding the applications revealed a number of common themes that can be broadly categorised as:

- Opposition to the extension of light rail
- Concern about the costs of the project
- Separation of the raising of London Circuit from Light Rail Stage 2
- The need for the four way intersection at London Circuit
- Construction traffic and disruption
- Changes to traffic post-construction
- Pedestrian and cyclist safety
- Road vehicle safety

There were a few references in the public submissions to the proposed landscape treatment and other aspects related to the design of the public realm. Some noted the *'loss of the grass inside the cloverleaves'* and that the *'removal of these green spaces in Civic and building over them will increase the urban heat island effect.'* It was also noted that *'trees along the (new) roads around the new high-rise buildings will not replace the fields of grass.'* Others commented that *'RLC will have a negative impact on the landscape and vistas that are an essential element of the Griffin design'* and noted impacts on Canberra's Garden City principles.

## Matters the NCA is not considering in this consultation

### Opposition to the extension of light rail

The NCA received submissions that expressed opposition to the ACT Government's proposed expansion of the light rail system. A number of these submissions described alternative public transport options which, in the view of the submitter, were more appropriate to Canberra.

As noted elsewhere in this report, the proposed light rail system does not form part of the NCA's assessment of this particular proposal, although the NCA recognises that raising London Circuit will facilitate further expansion of that system in Canberra. The NCA supports planning for the provision of public transport in a growing city, but notes that community concerns regarding the selection of light rail as the preferred transport mode are largely a matter for the ACT Government's consideration at this time. The NCA has briefed ACT officials on concerns expressed in the



consultation process and suggestions for alternative transport systems which have included alternative routes, 'trackless trams' and electric buses.

### Concerns about the costs of the project

The NCA received submissions that expressed concern about the cost of the proposed raising of London Circuit. These submissions generally opined that the proposal did not represent value for money, with many noting the 2021 Auditor General's Economic Analysis of Light Rail Stage 2A.

Community concerns regarding project cost are a matter for ACT Government consideration. Project costs are not matters addressed in the National Capital Plan and do not form part of the NCA's assessment. The NCA has passed these concerns on to the proponent.

### Matters for consideration

#### Separation of the raising of London Circuit from Light Rail Stage 2 and the need for the removal of the cloverleaves

A number of submitters expressed the view that the proposal should be considered at the same time as the light rail proposal. The raising London Circuit portion of the works has been separated to allow it to be considered by the NCA as a standalone project.

The ACT Government has confirmed that while the RLC Project will facilitate the proposed construction of Light Rail Stage 2, it considers the raising London Circuit to be a stand alone project which enables future development of the city.

The NCA recognises and understands the frustration of submitters that there is no visibility through a fully developed works approval application to the full Light Rail scheme prior to the lodgement of the application for a major part of this project – raising London Circuit. While the full design details of the extension of the Light Rail system have not been presented to the NCA, the ACT Government has been releasing material into the public domain outlining the Stage 2A scheme to Commonwealth Park in particular since 2020. These details can be viewed at <https://www.act.gov.au/lightrailtowoden>.

The proposed new intersection allows the freeing up of land in and around London Circuit for office, residential and mixed use developments - as is foreshadowed in the National Capital Plan. Changing the road network through a stand alone application enables the early sale, and subsequent development of, sites adjacent to a proposed future transport mode on the southern side of Civic. This is consistent with the general planning principles of bringing the City to the Lake. These works should indirectly facilitate other projects through provisioning of a transport network with increased capacity. Undertaking the RLC Project now also ensures that such future development doesn't preclude the cost-efficient and orderly implementation of the Light Rail project. As noted above this approach is consistent with planning practices employed in other growing cities and places to help manage supply and demand issues within city renewal processes, including the demand for housing and the need to plan for and maximise the viability of the public transport system in the longer term.

The NCA is the approval authority for the newly created development sites and, as is required by the provisions of the National Capital Plan, will require that proposals display the highest standards of urban design. Exemplary architecture and design for sustainability and social inclusion reflecting the character of the National Capital are to be demonstrated.

To allow the NCA to determine the RLC Project separate from Light Rail Stage 2A, a final design of raising London Circuit has been provided as part of the Works Approval application and the Environmental Assessment. The proposal to undertake the extension of light rail from the City to Commonwealth Park will be the subject of a separate Works Approval application and Environmental Assessment process.

### **Landscape and the Public Realm**

The proposal generally provides for a high quality public domain, similar in character to that of Constitution Avenue as is appropriate for the National Capital. The NCA applauds the proponents commitment to the public realm includes granite paving, high quality street furniture and significant new plantings of London Plane trees on the verges of London Circuit (west side) and in the verges and median on the eastern side of London Circuit as part of the works. These large canopy trees will provide shade over the road and footpaths reducing heat island effects. Similarly, new landscape treatments at the proposed intersection of London Circuit and Commonwealth Avenue will include large shade trees that reinforce and reflect the structural and historical plantings of Commonwealth Avenue.

The NCA has indicated to the proponent that the landscape and public realm proposals for the raising of London Circuit; including lighting, paving and street plantings, should be carried through in the future scheme along Commonwealth Avenue. To protect the views and access to the Parliamentary Vista any future transport system must be wire free, with the retention of the current grass covering on Commonwealth Avenue to maintain a green corridor to the Australian Parliament House.

### **Construction traffic and disruption**

Approximately one third of submissions from the public expressed concern regarding the delays and impacts of construction to pedestrians, cyclists, public transport routes, road traffic volumes, and parking.

The project proponent is responsible for the long and short term impact of undertaking the works. This includes management of the traffic impacts during construction. The proponent has advised the delays will be up to five (5) minutes, but this will vary depending on the traffic route and construction stage of the project.

Buses are expected to experience delays of between two to three minutes during the AM and PM peak hours. An average increase in travel time of between two and four minutes for pedestrians and an average increase of between one and three minutes for cyclists.

During construction, traffic speed on Commonwealth Avenue around the work site will be reduced to 40km/hr and London Circuit will be closed between Edinburgh and Constitution Avenues.

The proponent has acknowledged that the works will create significant disruption to the Canberra metropolitan traffic network during construction. To address these impacts the proponent has advised it has put in place a number of mitigation measures. These are:

1. The establishment of a Traffic and Transport Liaison Group to monitor and adjust traffic impacts of construction activities. Initial work includes minimising heavy vehicle movements as much as possible during peak AM and PM periods.
2. A travel demand management strategy to reduce private vehicle use.
3. A temporary redirection of approximately 640 parking spaces in the RLC Project footprint (which will reduce trip numbers).
4. Construction vehicle movement arrangements would be developed with specific regard to:
  - a. Public transport and bus priority measures – noting that some bus routes will be re-routed via Vernon Circle and Constitution Avenue.
  - b. Pedestrian movements - Commonwealth Avenue and London Circuit pedestrian and bike lanes will be maintained, however pedestrians and cyclists will be encouraged to take alternative routes to avoid the active construction site.
  - c. Other construction projects in the locality.
  - d. Crime prevention through environmental design principles.
  - e. Special events.

The effectiveness and success of these measures are for the proponent to manage.

#### Changes to traffic post-construction

The proposal is for the conversion of London Circuit and Commonwealth Avenue from a grade separated arrangement to a signalised intersection. This involves removing the north-west and south-west cloverleaf ramps and adjoining slip lanes which currently accommodate movements between Commonwealth Avenue and London Circuit.

The proponent has advised that other than the east bound movement provided by the south-western clover leaf all current vehicle movements currently available will remain. The proposal facilitates safer and more efficient movement for pedestrians and cyclists through the southern part of the city.

#### Road Network

The RLC Project includes the removal of the south-west cloverleaf, which currently facilitates the northbound movement from Commonwealth Avenue to Parkes Way eastbound. The RLC Project doesn't replace this movement. This is considered to be a low impact as less than 100 vehicles per hour (87 vehicles in the AM and 84 vehicles in the PM peaks) make this turn during peak times. Alternative routes are available via a right hand turn from Commonwealth Avenue into London Circuit and then a right hand turn into Constitution Avenue eastbound.

#### Public Transport

The current bus movements to and from London Circuit and southbound on Commonwealth Avenue would continue to be facilitated during construction phase by the northbound right turn and the westbound left turn at the signalised intersection.

## **Active Transport**

The RLC proposes a more legible, and direct active transport network that improves pedestrian and cyclist safety, connectivity and amenity along London Circuit and Commonwealth Avenue as well as between the two corridors and adjoining principal active travel routes. The project includes dedicated cycle paths, and wide footpaths.

## **Parking**

The RLC Project will result in the permanent loss of approximately 50 parking spaces from the Section 116 long-stay carpark along London Circuit. This carpark is somewhat remote and underutilised. The NCA has been advised that there is often spare capacity in this carpark, therefore the displaced car parking spaces will be accommodated within the broader local network.

## **Pedestrian and cyclist safety**

Pedestrian and cyclist access will be maintained throughout the construction period, to maximise safety the following mitigations are proposed to address pedestrian and cyclist safety concerns:

1. Pedestrians and cyclists will be encouraged to take alternative routes to avoid an active construction site.
2. Barriers will be placed between Commonwealth Avenue traffic lanes and the adjacent work sites.
3. 40km/h Road Works speed zone to be posted on Commonwealth Avenue between Vernon Circle and Parkes Way for the duration of the works.

In addition to the above, detailed traffic management measures that promote safe pedestrian crossing and consider other vulnerable road users and their interaction with the construction activities, are to be established and documented in a Construction Transport Management Plan (CTMP), including the consideration of Crime Prevention Through Environmental Design (CPTED) Principles. The CTMP will be developed by the appointed contractor in consultation with the proponent and the NCA.

The NCA has been advised that the proponent is committed to ensuring pedestrians and cyclists are notified in advance of any changes to access and movement arrangements. Clear and safe pedestrian and cyclist signage and wayfinding mechanisms will be in place prior to works commencing that would change access and movement arrangements through the broader RLC Project construction area.

## **Road vehicle safety**

A number of submissions (approximately 10%) made comments in relation to potential safety issues associated with the proposed changes to the intersection design, citing concerns around the safety implications of the change from grade separated arrangements to a level, controlled intersection.

The proposal improves cycle and pedestrian safety with the existing grade separated vehicular movements being consolidated into an intersection allowing for full pedestrian and cycle access.

The fully signalised intersection of Commonwealth Avenue and London Circuit creates a safe and legible walking and cycling connection on the southern side of City Hill where none currently exists.

The proposed intersection has been designed considering the following:

- Traffic performance
- Support for the bus network
- Needs of pedestrians and cyclists
- Road safety – striking a balance between all user groups
- Impact on the wider traffic network

A detailed assessment of the performance and safety impacts of the proposed upgrades is available in Appendix A “Traffic and Transport Impact Assessment” of the Environmental Assessment, in particular Section 7 (included in the Works Approval application documentation).

The proposed changes have been designed with consideration for the requirements of the ACT Government Municipal Infrastructure Standards, Austroads Guides, Australian Standards and ACT Government specifications and guidelines. A road safety assessment was undertaken as part of the design development - with potential risks in road safety reviewed and addressed within the design. In addition, a Safety in Design Workshop has been held to identify safety hazards for the intersection design together with a Human Factors assessment. Designers have regular engagement with the proponent regarding the design and considering the wider requirements for buses, cyclists and pedestrians.

The current traffic arrangements provide little or no provision for safe cyclist and pedestrian movements. The proposed intersection will facilitate the existing movements in the following way:

- Commonwealth Avenue northbound four lanes on approach and two on departure. The median-side northbound lane will be a right turn lane providing access to the east and the kerb side lane on approach will be left turn only providing access to the west.
- Commonwealth Avenue southbound three lanes on approach and three on departure. No right turns permitted. Left turn into London Circuit east is provided. This movement was previously not facilitated in the grade separated intersection.
- London Circuit eastbound two lanes on approach and two lanes on departure. As is currently the case, no right turns are permitted. Left turn is provided to travel south on Commonwealth Avenue. This movement is currently facilitated by a ramp and having to merge with the Parkes Way off-ramp. By removing the merging of traffic, the new configuration provides improved safety outcomes for the left turn movement onto Commonwealth Avenue.

The proponent has advised the NCA that *‘the conversion to an at -grade intersection introduces additional vehicle conflicts points compared to the existing grade separated arrangement. However, this is at the detriment to other design considerations include accessibility for all users and urban design.’*

Road safety risks identified with this change have been mitigated through the design process. These include:

- Reduction in speed limits on London Circuit and Commonwealth Avenue to be reflective of the environment and reduce severity of crashes.
- Provision of appropriate traffic signal lanterns and suitable visual sighting distance for drivers.
- Provision for pedestrian head start treatments for vehicle turn movements. Increasing visibility of pedestrian to drivers and safety for pedestrians.
- Urban design elements to inform drivers of the change in road environment and gateway to the city centre.

The proponent has also advised the NCA that *‘the signalised at grade intersection provides overall improved safety outcomes across all modes of transport, particularly for cyclists and pedestrians who have poor design outcomes in the current layout.’*

The following road safety benefits have been identified:

- Minimising the number of crashes related to ramp merges, where crash clusters have been observed in the last five years.
- Providing separated off-road cycleways has the potential to result in less cyclist crash frequency.

## Community views

The majority of submissions related to the raising of London Circuit proposal (WA102570). There were relatively few direct responses to the temporary works on Vernon Circle (WA102593) or traffic signalisation at the intersection of Parkes Way and Coranderrk Street (WA102580).

Many submissions raised issues related to the wider Light Rail Stage 2 proposal. Typically, submitters stated that the raising of London Circuit should not be assessed in isolation of the Light Rail Stage 2 proposal. Comments received included:

*'Its approval should not be contemplated before the case has been demonstrated for the proposals which have generated it, and they have themselves been approved, ie light rail to Commonwealth Park/Woden and the "future developments" within the existing clover leafs. In other words approval of this work should not be given in isolation, but should only be considered within the overall context of which it is a part.'*

*'RLC is part of Light Rail stage 2A. Works approval for RLC should await a full response to the Auditor General's report on Light Rail Stage 2A. Any consideration of RLC by the NCA should only take place in the context of a fully documented Works Application for Light Rail Stage 2.'*

A number of submitters also commented on the cost and selected route associated with Light Rail Stage 2, stating that:

*'The RLC and associated programs should not be approved until the whole of the extension to Woden has been validated through rigorous cost benefit analysis and all necessary approvals have been obtained.'*

*'The profligate expense and disruption of persevering with the now outmoded Light Rail "vision" is unsustainable.'*

*'I strongly believe that the raising of London Circuit and all associated works should not proceed until after Canberra citizens have been presented with a fully costed proposal of the entire Light Rail scheme to connect Woden Town Centre.'*

*'... 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?'*

*'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.'*

Others pointed to what appeared to be a lack of consideration given to other modes of public transport:

*'Extension of the tram to Woden is potentially the most expensive and least flexible solution to the need for renewable powered public transport.'*

*'Compared to more modern transport solutions, light rail suffers from inflexible routes, increased journey times, major traffic disruption, the inability to provide express services, and high track construction costs with significant greenhouse gas emissions.'*

*'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.'*

Many submitters were also concerned about traffic congestion, delays and disruption during construction and the ongoing impacts following completion of the works.

*'This is a rather surprising proposal given the ACT Government always talking about road safety and reducing emissions! Don't most accidents in ACT happen at intersections? So why create more where there currently are none? Why have more intersections for pedestrians to have to cross?'*

*'... having another traffic light controlled intersection on such a major road as Commonwealth Avenue will only increase traffic congestion, increase trip times (not just for cars, also for buses and especially for bicycles and pedestrians) ...'*

*'A significant feature of Commonwealth Avenue is the minimal number of intersections and associated traffic lights, allowing for free flow of traffic. The proposed additional intersection, compromises the integrity of this design. The proposal does not quantify the benefits and disadvantages of this intersection in any detail.'*

*'Why would you add an intersection with traffic lights when the current road configuration provides a more efficient use of an underpass and access routes without lights? We don't need additional traffic lights. The existing solution allows for traffic to flow through the area and access all required routes without the delay that would be created by additional lights.'*

*'The proposed solution will also remove Eastbound access to Parkes Way from vehicles travelling north on Commonwealth Avenue, forcing more vehicles to drive through longer sections of the city and further increasing congestion.'*

*'I am at a loss to understand how anyone thinks that putting in place a four way intersection in place of the current clover leaf configuration could be an 'enhancement'. traffic already banks up substantially on Commonwealth Avenue*



*at peak times, and adding an extra set of traffic lights will only compound the problem.'*

*'... will put an end to the free flow of traffic on arguably Canberra's most important arterial road, much used to introduce state and other visitors to the Bush Capital.'*

Some submitters also expressed significant concerns for other road users' safety, including pedestrians and cyclists. This ranged from commentary regarding required standards to potential conflicts between cyclists and pedestrians.

*'I believe that the idea of people walking across Commonwealth Avenue at grade is a furphy and compromises high speed traffic into the City, while also unnecessarily endangering pedestrians, where current safe under passes exist that may also lead to other innovative design solutions.'*

*'Why have more intersections for pedestrians to have to cross?'*

*'... the replacement of grade separation with a signalised intersection imposes more constraints and time delays on active travel.'*

*'I'm very concerned the design of the raising of London Cct will have unintended and negative consequences for bus public transport and active travel across the surrounding area.'*

*'Crossing the Light Rail line at this new raised London Cct crossroad will become a very busy and very slow intersection for all types of users.'*

*'... more opportunities to reduce opportunities for bicycles to conflict with motor vehicles could be taken while infrastructure is been replaced.'*

The submissions that supported the Works Approval applications noted:

*'Great proposal, separated bicycle lanes (as shown in the plan) are the best part of it. That area has been car-centric for far too long.'*

*'These changes would also make the roads significantly more accessible and safe for travellers who are not using a car, such as cyclists or pedestrians, as in line with the ACT 2020 Transport Strategy.'*

*'It prioritises and shifts focus towards modes of transportation such as walking, cycling and light rail ...'*

*'The changes will pave the road, in a manner of speaking, for future growth by enabling more efficient transportation options and more efficient city land usage.'*

*'If nothing else, the reduced congestion from increased access via other more efficient modes of transit should improve the driving experience within the city centre ...'*

*'Raising London Circuit, removing the clover leaf interchanges and creating a much more pedestrian and cyclist friendly path from the city to the lake will allow better use of the land between the city and the lake rather than it largely being a desert of roads, cars and carparks as it is currently.'*

## Conclusion

The NCA's consultation process was carried out in accordance with the National Capital Plan and the NCA's *Commitment to Community Engagement*.

The NCA undertook additional consultation measures, including extending the consultation period timeframe.


As noted above, there were a number of objections in the public submissions that raised matters beyond the legislative reach of the NCA, such as the extension of light rail to Woden and the cost of the proposal to raise London Circuit. These matters do not form part of the NCA's consideration of the proposal and have been referred to the ACT Government.

The NCA considered all issues raised and concluded the proposal is not inconsistent with the National Capital Plan.

On 29 March 2022 the NCA approved the works applications:

- WA102570 - Raising of London Circuit.
- WA102593 - Temporary works on Vernon Circle.
- WA102580 - Traffic signalisation at the intersection of Parkes Way and Coranderrk Street.

## Attachment A: Advertising Media



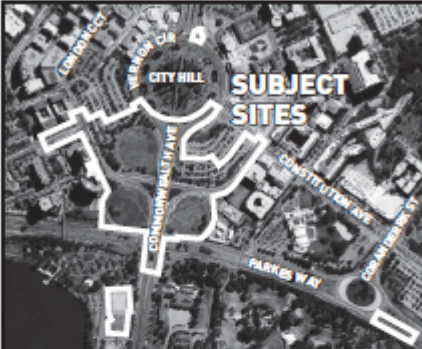
**Australian Government**  
**National Capital Authority**

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### WORKS APPROVAL

Open for Public Consultation

**Raising London Circuit to become a four-way intersection and associated changes to traffic movements on Commonwealth Avenue, Vernon Circle, Parkes Way and Coranderrk Street**



The National Capital Authority (NCA) has received three separate Works Approval applications that will enable a future light rail project.

- **Raising of London Circuit** - creation of a four-way intersection at the junction of London Circuit and Commonwealth Avenue. This is proposed to be achieved by demolition of the two bridges over London Circuit, regrading of London Circuit and changes to traffic movements.
- **Temporary works on Vernon Circle** - installation of temporary traffic signals and widening of the existing northern road loop around City Hill between London Circuit and City Hill to create a dedicated bus lane and separate vehicle lane.
- **Signalisation of traffic at the intersection of Parkes Way and Coranderrk Street** - installation of traffic signals to control right hand movements during the weekday morning peak traffic.

The NCA is seeking public comment on the traffic impact, design and quality of each proposal and any issues which the community considers should be considered as part of the NCA's detailed evaluation of the applications.

The plans and supporting documentation and other information related to the application can be viewed at the NCA's website **from 30 October 2021**.

Submissions can be lodged through the NCA website **from Saturday 20 November to 5pm Friday 10 December 2021** when consultation closes.

Please contact the NCA for further information on (02) 6271 2888.

[nca.gov.au](https://www.nca.gov.au)
[nca.gov.au](https://www.facebook.com/nca.gov.au)
[nca\\_media](https://www.instagram.com/nca_media)
[nca\\_media](https://www.youtube.com/nca_media)


Left: Print advertising in the Canberra on Saturday 30 October, 6 November, 13 November, 20 November, 27 November and 4 December.

Below: Physical A1 signs posted on each site related to the different Works Approval applications.

*Building the National Capital in the hearts of all Australians*

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## HAVE YOUR SAY

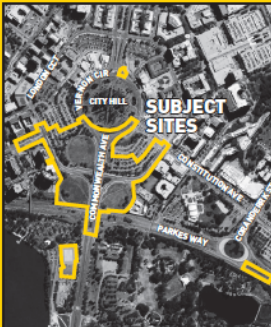


**Australian Government**  
**National Capital Authority**

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### WORKS APPROVAL - RAISING LONDON CIRCUIT TO BECOME A FOUR-WAY INTERSECTION AND ASSOCIATED CHANGES TO TRAFFIC MOVEMENTS ON COMMONWEALTH AVENUE, VERNON CIRCLE, PARKES WAY AND CORANDERRK STREET

The National Capital Authority (NCA) has received three separate Works Approval applications that will enable a future light rail project.



- **Raising of London Circuit** - creation of a four-way intersection at the junction of London Circuit and Commonwealth Avenue. This is proposed to be achieved by demolition of the two bridges over London Circuit, regrading of London Circuit and changes to traffic movements.
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[www.nca.gov.au](https://www.nca.gov.au)

Social media - FACEBOOK	
 <p>The Riotact 3 November 2021 · 🌐</p> <p>Key light rail enabling works to raise London Circuit have been sent to the <a href="#">National Capital Authority</a> for approval, and are now available for comment.</p> <p>THE-RIOTACT.COM Raising London Circuit works approvals lodged with National Capital Authority   The RiotACT</p> <p>👍👎 You and 46 others · 15 comments 2 shares</p> <p>👍 Like · 💬 Comment · ➦ Share</p>	<p>Post by RiotACT</p> <p>47 reactions 15 comments 2 shares</p>
 <p>National Capital Authority Published by Gabrielle Affleck · 17 December 2021 · 🌐</p> <p>ONE WEEK   The consultation period for the raising of London Circuit closes in one week's time on 24 December. Submit your e-submission now by going to our website at <a href="http://www.nca.gov.au/consultations/lrc">www.nca.gov.au/consultations/lrc</a></p> <p>👍👎 11 · 2 comments 1 share</p> <p>👍 Like · 💬 Comment · ➦ Share</p>	<p>11 reactions 2 comments 1 share</p>
 <p>National Capital Authority Published by Dom Northcott · 30 October 2021 · 🌐</p> <p>Changes are coming to London Circuit. Go to our website to <a href="#">#BeInformed</a> and view, read, understand the three Works Approval applications that the ACT Government has put forward for the raising of London Circuit and associated traffic changes. This six week consultation period for the package of works is now open, with all information available on our website. Live e-submission links will be made available from Sat 20 Nov to <a href="#">#HaveYourSay</a> through to 5pm, Friday 10 December 2021... <a href="#">See more</a></p> <p>👍👎 8 · 3 shares</p> <p>👍 Like · 💬 Comment · ➦ Share</p>	<p>8 Reactions 0 Comments 3 Shares</p>



<div data-bbox="231 219 805 347"> <p><b>National Capital Authority</b> Published by Gabrielle Affleck · 9 December 2021 ·</p> <p>REMINDER   The consultation period for the raising of London Circuit has been extended to COB Friday 24 December, giving you more time to fill in your online submission. Head to the NCA website to have your say and to access a variety of resources outlining the proposals: <a href="http://www.nca.gov.au/consultations/ric">www.nca.gov.au/consultations/ric</a></p> </div> <div data-bbox="231 347 821 716"> </div> <div data-bbox="231 716 821 786"> <p>4 1 share</p> <p>Like Comment Share</p> </div>	<p>4 reactions 1 share</p>
<div data-bbox="231 808 805 936"> <p><b>National Capital Authority</b> Published by Gabrielle Affleck · 2 December 2021 ·</p> <p>UPDATE   The consultation period for the raising of London Circuit has been extended to 5pm, Friday 24 December. Head to the NCA website to have your say and to access a variety of resources outlining the proposals: <a href="http://www.nca.gov.au/consultations/ric">www.nca.gov.au/consultations/ric</a></p> </div> <div data-bbox="231 936 821 1305"> </div> <div data-bbox="231 1305 821 1375"> <p>4 2 shares</p> <p>Like Comment Share</p> </div>	<p>4 reactions 2 shares</p>
<div data-bbox="231 1400 710 1505"> <p><b>National Capital Authority</b> Published by Gabrielle Affleck · 13 November 2021 ·</p> <p>We're seeking community comment on the three separate Works Approvals associated with the raising of London Circuit. Make sure to read &amp; watch all the info on our page ahead of the e-submission links going live on the 20 November. Looking for more information? Go to our website: <a href="http://www.nca.gov.au/consultations/ric">www.nca.gov.au/consultations/ric</a></p> </div> <div data-bbox="231 1505 710 1944"> </div> <div data-bbox="231 1944 710 2002"> <p>You and 7 others 2 shares</p> <p>Like Comment Share</p> </div>	<p>8 reactions 2 shares</p>
<p><b>Social media - TWITTER</b></p>	

<div data-bbox="236 219 284 268"></div> <div data-bbox="292 219 746 280"> <p><b>NCA</b> @nca_media · Dec 17, 2021</p> <p>ONE WEEK   The consultation period for the raising of London Circuit closes in one week's time on 24 December.</p> </div> <div data-bbox="292 297 667 338"> <p>Submit your e-submission now by going to our website at <a href="https://nca.gov.au/consultations/...">nca.gov.au/consultations/...</a></p> </div> <div data-bbox="295 349 786 654"></div> <div data-bbox="295 663 707 685"> <p>🗨️ 🔄 ❤️ 📤 📊</p> </div>	
<div data-bbox="236 716 284 766"></div> <div data-bbox="292 716 738 775"> <p><b>NCA</b> @nca_media · Nov 13, 2021</p> <p>Make sure to be informed by reading &amp; watching all the info on our page re the raising of London Circuit &amp; other traffic changes.</p> </div> <div data-bbox="292 788 639 846"> <p>Have your say when e-submissions open on 20 Nov! More information on the proposed project on our website: <a href="https://nca.gov.au/consultations/...">nca.gov.au/consultations/...</a></p> </div> <div data-bbox="292 855 743 1303"></div> <div data-bbox="292 1312 671 1335"> <p>🗨️ 🔄 1 ❤️ 2 📤 📊</p> </div>	<p>1 Retweet 2 Likes</p>
<div data-bbox="236 1361 284 1411"></div> <div data-bbox="292 1361 746 1422"> <p><b>NCA</b> @nca_media · Nov 20, 2021</p> <p>HAVE YOUR SAY by filling in your e-submission now on our website regarding the raising of London Circuit.</p> </div> <div data-bbox="292 1438 767 1482"> <p>Submit your thoughts at <a href="https://nca.gov.au/consultations/...">nca.gov.au/consultations/...</a> through to 5pm, Friday 10 December, when the consultation closes.</p> </div> <div data-bbox="295 1494 805 1809"></div> <div data-bbox="295 1818 722 1841"> <p>🗨️ 🔄 ❤️ 1 📤 📊</p> </div>	<p>1 Likes</p>

<div data-bbox="240 226 288 271">  </div> <div data-bbox="292 224 770 284"> <p><b>NCA</b> @nca_media · Dec 2, 2021</p> <p>UPDATE   The consultation period for the raising of London Circuit has been extended to 5pm, Friday 24 December.</p> </div> <div data-bbox="292 297 724 340"> <p>Head to the NCA website to have your say and to access a variety of resources outlining the proposals: <a href="https://nca.gov.au/consultations/...">nca.gov.au/consultations/...</a></p> </div> <div data-bbox="296 349 766 640">  </div> <div data-bbox="296 647 687 672"> <p>🗨️ ↻️ ❤️ 📤 📊</p> </div>	
<div data-bbox="240 701 288 745">  </div> <div data-bbox="292 698 780 766"> <p><b>NCA</b> @nca_media · Dec 9, 2021</p> <p>The consultation period for the raising of London Circuit has been extended to COB Fri 24 Dec, giving you more time to fill in your online submission.</p> </div> <div data-bbox="292 779 769 822"> <p>Head to our website to have your say and to access a variety of resources outlining the proposals: <a href="https://nca.gov.au/consultations/...">nca.gov.au/consultations/...</a></p> </div> <div data-bbox="296 831 777 1124">  </div> <div data-bbox="296 1133 699 1158"> <p>🗨️ ↻️ ❤️ 📤 📊</p> </div>	



## Attachment B: List of Submitters

(List of names agreed to be published)

Brendan Campbell David McIntosh Thomas Middlemiss Pedal Power ACT Penleigh Boyd Sean Russ Morison Amanda Murray Upton Janine Hayes Barry Horne John Madelly Greg Cornwell AM Kylie Joy Marks Kylie Wildlife Carers Group Tom Westland John Smith Jack Kershaw Robin Chalmers Matt Watts Richard Johnston Robin Eckermann Mary Barker Tony Cook Andre Wheeley Barry Zazoniuk Paul Coggan Greg Sadil Natalie Jansen Peter Reynders Giancarlo Savaris Rod Power Maureen Marshall Peter Woodrow John L Worcester Vaughan Wilson Robert Koch Szusza Ihasz Ashley Lamont Jim David Thompson	Jodie Andrew Berry David H. Samuel Margerison John May Colin Walters Graham Anderson Geoff Henkel Rebecca Hill Bruce Paine Brendan Halloran Damien McGrath Hamish McKinnon Alex Robyn Coghlan Laura Miller Kent Fitch Barbara Moore Mark Dando National Trust of Australia (ACT) Wayne Arthur George Wilson Shane Carmody David Reese Mary Baumgarten Peter Harold Sherman Paul Gray Prof. B.M. Bodart-Bailey Brian and Sabrina Caldwell Michael Roche Lake Burley Griffin Guardians David Roberts Inner South Canberra Community Council Frances McGee Di Johnstone AM Public Transport Association of Canberra ACT Heritage Council Griffith/Narrabundah Community Association
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