WALTER BURLEY GRIFFIN SOCIETY INCORPORATED

Submission No. 5
(Bridging of Kings Avenue)

M.R. 29/07/08

CANBERRA CHAPTER

Secretary

Parliamentary Standing Committee on Public Works

Parliament House

Parkes ACT 2600

INQUIRY INTO PROPOSED BRIDGING KINGS AVENUE

OVER PARKES WAY

Established in 1988 in Sydney, the Walter Burley Griffin Society Incorporated commemorates the lives and works of Walter Burley Griffin and Marion Mahony Griffin and promotes the ideals, vision and community life they fostered in Australia. It aims to promote a better understanding of the lives and works of the Griffins, promoting especially the preservation and conservation of landscape designs, urban plans, buildings and other works designed by or having an association with the Griffins. The Society has several hundred members from various parts of Australia and the USA.

2. The Canberra Chapter appreciates very much the opportunity provided by the Parliamentary Standing Committee on Public Works to examine the works proposal by the National Capital Authority for Russell intersection, Canberra.

Scrutiny of the Griffin Legacy program

- 3. The Chapter was formed in 2004 and one of its main objectives is to examine development proposals against the design intent, layout, principles and values of the Griffin Plan for Canberra. There are elements that require protection and elements that can be recovered or adapted for the benefit of the future of the National Capital. This objective is similar to those of the National Capital Authority when they initiated their *Griffin Legacy Project* in 2002. However, NCA's ensuing strategic initiatives and development propositions under the auspices of "The Griffin Legacy" are in many fundamental respects inconsistent with and contrary to the intent, principles and potential of the Griffin Plan. This view is supported by many other experts and practitioners.
- 4. The Joint Standing Committee on the National Capital and External Territories recommended in March 2007 that the Minister should withdraw and review the so-called "Griffin Legacy Amendments" to the National Capital Plan, but the Minister declined. The Amendments themselves were typical of many recent development proposals by the NCA which have not been subjected to adequate scrutiny and debate by stakeholders, the public, concerned professionals and independent assessors. The current Inquiry into the NCA by the Joint Standing Committee on the National Capital has taken abundant and expert evidence regarding lack of accountability and checks and balances in NCA's decision-making processes.
- 5. This submission is motivated firstly by the location of the site for the Overpass being a dynamic, integral element of Griffin's Great Triangle, the Central National Area and landscape vistas,

with impacts upon the patterns of traffic and land use along the metropolitan base of the Triangle. Secondly, the submission tendered to the Committee by the NCA notably exposes the basic shortcomings characteristic in recent times of NCA's project formation, evaluation and approval processes.

- 6. The NCA is both proponent and approving authority, in effect, for its projects. Parliamentary scrutiny has tended to be circumscribed in some instances (eg. the ASIO/ONA building on Constitution Avenue). With respect to the Environment Protection and Biodiversity Conservation Act, the experience of the Society is that the NCA has been able to obtain unduly favourable treatment, due perhaps to the complex and technical nature of the projects (eg. National Gallery extensions). It is not evident from NCA's submission to the present Inquiry whether the environmental and heritage impacts of the proposal are being assessed adequately as a "controlled action" under the EPBC Act.
- 7. It is reassuring that the Public Works Committee's terms of reference are broad in that they encompass the rationale and purposes of the proposal and the public benefits of the development, as well as cost effectiveness.

Purposes of the proposal

- 8. The proponent indicates a number of purposes. They are not ranked, quantified or evaluated. One is presumably infrastructure in connection with the Griffin Legacy redevelopment of Constitution Avenue. An intent of this urban boulevard duplication was to break up and calm the parallel traffic through Parkes Way as new, multiple land uses evolved and the City was connected with the Lake. There was also provision for a recessed light rail public transport easement south of the new Constitution Avenue. The proposed Russell flyover and high speed Parks Way thoroughfare are patently at odds with these prospective scenarios.
- 9. The Society's statement to the Joint Standing Committee on the *Griffin Legacy Amendments* to the National Capital Plan (23 February 2007, Section 4) submitted that Griffin intended a great park and cultural institutions between Constitution Avenue and the Lake. There is no point in consolidating Parkes Way "as a car-dominated, lifeless urban arterial; it should be reconstructed as a 'Capital Terrace' with active frontage along its length, easy street crossings, people space and direct links to the Central Parklands."
- 10. A second stated purpose is to "restore King's Avenue as one side of Griffin's National Triangle." Again, the proposal seems quite contrary to the purpose. Compared with the present clear linear form, the proposed flyover introduces a new dynamic distortion into the geometric layout. There is a new bridge, earth mounds for the recessed Parkes Way and eight intersecting access and exit roads in a pronounced, large, complex intersection structure. They will detract from rather than enhance the line of King's Avenue.
- 11. Another claimed purpose is to alleviate traffic congestion. Such a claim can only be supported by an overall strategy and data studies covering the whole Central National Area and main connecting avenues, east, west, south and north. Supporting baseline traffic data and scenarios of future prospective traffic flows seem to be lacking in the NCA's submission. The

intersection proposal calls for relevant coordinated and integrated land use and transport studies by the NCA and the ACT authorities, but such joint assessments do not seem to have been provided to the Committee.

- 12. Common sense indicates that the extra speeding under Kings Avenue achieves no substantial gain either in travel time or greenhouse emissions as roundabouts and intersections with lights are a mere few hundred metres away along Parkes Way to the east (Morshead Drive-Russell & Menindee Drives) and west (links planned to Constitution Avenue). There is a basic contradiction in a short interval of free flow ending in both directions with roundabouts or lights.
- 13. A related purpose would be to raise the level of safety for cars, motorists, cyclists and pedestrians at this intersection. No hard evidence or reasoning is provided by the proponent and the purported gains are highly questionable.
- 14. "Improved access to the Central National Areas" and "improved amenity for visitors" are also mentioned in the NCA's submission. Again no data is provided, whereas common sense suggests that access and amenity are <u>not</u> improved by the flyover. The flyover will rather compound the disadvantages of car travel by facing motorists with intersection complexity (at Kings Avenue level) and speeding traffic (Parkes Way) when the glorious, unfolding views into the National Area and across the Lake to the mountains warrant a slowing and simplicity of movement.
- 15. In summary:
 - a) the need for and purposes of the proposed works are not demonstrated
 - b) the proposed works seem to contradict the stated purposes and
 - c) the proposal should be assessed in the context of the directly related land use and transport plans for Constitution Avenue, Parkes Way and Morshead Drive.

Landscape harmony and vistas

- 16. Landscape harmony, special vistas and National Capital symbolism have been achieved in the Central National Area through the Griffin Plan and subsequent planning and management. The present composition of triangle, avenues, bridges, Lake, buildings and open spaces would appear to be at risk of adverse impact from the flyover structure and reshaping of the land for Parkes Way underpass.
- 17. There are important studies undertaken by the NCA of the vistas across the Parliamentary Triangle and of the Central Parklands, where a Master Plan is in preparation by the winners of an international competition. These studies are highly relevant to an assessment of the proposed Russell flyover. They are relevant to the enhancement of these areas and connected with the "calming" and modifications of Parkes Way foreshadowed in the *Griffin Legacy*.
- 18. It is unfortunately characteristic of recent NCA proposals that they are advanced for approval ahead of the completion of relevant basic studies and associated management and conservation plans. They are not mentioned in the NCA's submission.

Alternatives

19. It is fundamental that development assessment should address reasonable and feasible alternatives. The process leads to better proposals, enhancing benefits and achieving cost effectiveness. The so-called "options" described in the NCA's submission do not meet the criterion of alternatives. The obvious alternative of at-level intersection with lights does not seem to be assessed as an option at all.

Public consultation

20. The NCA has managed to advance this proposal without engaging in public consultation and debate, thus restricting the opportunities for evaluating alternative developments and designs.

Costs and benefits

21. The cost estimate for the flyover is \$26.6m. The benefits or purposes of the project, as suggested above, are dubious. Traffic benefits might have been quantified, but net gains seem questionable. The proponent has not detailed landscape and Griffin Plan effects but, as suggested above, they would seem to be negative or a significant risk. The costs of the basic alternatives of the status quo or at-level traffic lights are not provided, but the latter would be much less costly than the flyover proposal.

Conclusion

- 22. The Canberra Chapter of the Walter Burley Griffin Society is concerned that:
 - a) the NCA has advanced this proposal without supporting evaluation, studies and public consultation
 - b) no consideration appears to have been given to reasonable and feasible alternatives and their costs
 - c) prospective impacts on the landscape composition, vistas and National Triangle are not assessed
 - d) likely scenarios involving redevelopment of Constitution Avenue and Parkes Way do not seem to have been taken into account and
 - e) the substantial cost of the proposal is not demonstrably cost effective.

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