



**Brisbane Central Business District Bicycle User Group
CBD BUG**

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Development Assessment
Brisbane City Council
GPO Box 1434
Brisbane Qld 4001

Dear Sir or Madam

The following submission details the Brisbane Central Business District Bicycle User Group's (CBD BUG) position in relation to Development Application: A003953028 proposing three high-rise residential towers on the former ABC site at 600 Coronation Drive, Toowong.

There are aspects of the proposal that do not accord with the Toowong-Auchenflower Neighbourhood Plan e.g. proposed building heights. However, the in-principle position of the Brisbane CBD BUG is to limit comments on development proposals to the transport issues arising, and more specifically, people walking and riding bikes.

Need to discourage car-based travel

The plans submitted to date for this development appear to overly focus on enabling people to travel by private motor vehicle. This conflicts with the population's decreasing tendency to own and use private motor vehicles.¹

This approach is also adopted despite the site being less than five kilometres to the GPO and the development's proponents highlighting in their application that the site is highly accessible by many forms of private and public transport i.e.:

- Coronation Drive has a range of standard and express bus services to the CBD
- the site is highly accessible by rail, which is available via the Toowong railway station within the nearby Toowong Village complex
- a taxi rank is located immediately outside Toowong Village
- there is direct access to the Coronation Drive pedestrian and cycle path, and
- the Regatta ferry terminal is less than 170 metres away.

The bikeway in front of the proposed development is an extension of Brisbane's busiest and most successful bikeway. It carries up to 6,500 cyclists a day according to the Brisbane City Council and is the subject of \$10 million investment for the 2014-15 financial year in order to separate cyclists and pedestrians in this area. One of the endpoints is the Brisbane CBD and the other is the University of Queensland, the first and second largest trip generators in Brisbane according to the BCC's Transport Plan for Brisbane. The recommended cycling route between the two discourages some potential cyclists due to the hills in St Lucia on Sandford Street and Hiron Street, and it would now be difficult to build a separated pathway along the river to avoid these hills. Hence it is vitally important to avoid making further design mistakes that would further discourage potential cyclists, given council's plans to increase the cycling modal share to 5% by 2026 and the Integrated

¹ <http://chartingtransport.com/2010/01/08/evidence-of-mode-shift-in-australian-cities-bitre-data/>

Regional Transport Plan for South East Queensland which envisages a cycling modal share of 11% by 2031. The plans bemoan possible delays for motorists if a right turn into Coronation Drive is not permitted, but have nothing to say about delays for cyclists and pedestrians at the driveway and side-street crossing points.

While the documentation lodged for this site claims the proposal promotes pedestrian movement to and from public transport and centres, the only real evidence of this is the surface-level pedestrian and cyclist crossing of Coronation Drive. There is already a crossing of this nature in place so there is no gain for active transport from the proposal. The relocation of this existing crossing to a location some 40 metres south along Coronation Drive will provide minimal to no benefit for cyclists and pedestrians, and is suggested to be more about providing a right turn for motorists exiting the site onto Coronation Drive.

With this multitude of public and active transport options the CBD BUG calls for this site to be developed as a Transit Oriented Development (TOD). Supporting this suggestion are two important characteristics of this site - that it is closer to the CBD and has more public and active transport options already in place than other Brisbane TOD developments e.g. Yeerongpilly. While this proposal already has several features of a TOD, an essential element is a reduced amount of parking for personal vehicles. Accordingly, with the proponents of this development seeking to provide only 63 visitor carparks instead of the 83 required by BCC's ratio the CBD BUG supports this reduced level of car parking. In fact the CBD BUG would propose that BCC not apply any ratios for minimum carparks spaces and let the developer decide how many spaces should be provided.

Preserving continuity of Bicentennial Bikeway

The current plan seeks to meet the requirement of the Toowong-Auchenflower Neighbourhood Plan that requires an "extension of the Bicentennial Bikeway through the site to connect with Archer Street". However, cyclists currently do not tend to use Archer St because of its gradient, which is especially steep and unfriendly for city-bound riders. It may be intended that this new link that passes through this site will direct bicycle riders needing to pass this site to use Archer Street instead of Coronation Drive, to avoid conflicts with motor vehicles at the site's proposed principal access point. The CBD BUG rejects this approach entirely as it will disadvantage bicycle riders.

Should the proposal go ahead in its current form it is expected that the overwhelming majority of bicycle riders will continue to use the Coronation Drive footpath. This will lead to conflicts and crashes with motorists at the proposed principal access point for motor vehicles to/from Coronation Drive. This hazard is increased due to the widespread propensity of motorists to enter/exit premises without giving way to people walking and/or riding bikes on the footpath – due either to motorists' ignorance or disregard for the Queensland Road Rules.

This proposed new access point to the site is unnecessary and will cause a hazard to pedestrians and cyclists travelling along the Coronation Drive footpath. An access point for motor vehicles to/from Coronation Drive should not be allowed. Instead, vehicle access to/from this site should be limited to Archer St, as it was when the ABC occupied this site. This would also align with section 5.2 of the Toowong-Auchenflower Neighbourhood Plan. Key Acceptable Solutions listed within this plan under the heading of "Transport, car parking, access and servicing" are:

- A9.2 Vehicular access is not provided from a principal frontage where alternative access can be provided
- A9.3 Only one vehicle access point is provided to each site
- A9.6 Driveway crossovers maintain the integrity, quality and primacy of footpaths.

The intersection of Coronation Drive and Archer St should be changed to reduce the speeds of motorists entering it from Coronation Drive. In contrast, all three of the options show a left turn slip lane accompanied by a corner that will facilitate motorists making this turn at speed and causing a hazard to footpath users.

The bikeway needs to be protected and have priority over side streets and driveway traffic to be safe enough for children to use unsupervised. This is the standard of leading cycling countries and the CBD BUG expects the same to be possible here adjacent to Brisbane's best bikeway.

The CBD BUG has already noted in correspondence² to the Council and the Department of Transport and Main Roads concerning Archer Street that TMR's "Separated Cycleways Guideline" emphasises the principle of cyclist priority at side roads.

The guidelines state concerning intersections (Section 4).

Where motorised vehicles cross the path of pedestrians or bicycle riders, higher severity conflicts result, even if the relative speed is low. At conflict locations such as intersections where motor vehicles cross a cycle route, priority for bicycle riders should be highlighted in the design with safe turning speed, give-way lines and signs and green pavement treatment.

The guide then goes on to quote the Dutch Design Manual for Bicycles on the main requirements of Directness, Safety, Comfort and Attractiveness. Section 4.2.1 described "Unsignalised intersections with bicycle priority over the side road" and notes that "*in urban areas, the design of unsignalised intersections must highlight the priority of bicycle riders on the bicycle facility over traffic on the side streets.*" This priority is clearly not being met in the case of Archer Street and the nearby driveway crossings, or in the case of the proposed driveway exit for 600 Coronation Drive.

Other plans in the area will increase the number of cars, cyclists and pedestrians considerably with 35 Archer Street having 160 units, 611 Coronation Drive having 307 units planned, and 600 Coronation Drive having (at least) 486 units.³ Another development is occurring at 20 Archer Street. Council needs to carefully consider how to separate the various modes as poor design decisions have been made in this area in the past.

In contract to the stated crossing priority, areas of the bikeway near this proposed development have not been well designed. The almost universally ignored "stop" sign for cyclists crossing Archer Street adjacent to the development was the subject of condemnation in 1999 when originally installed, and despite huge growth in cyclist traffic since that time remains present as of December 2014. The BCC indicated to the CBD BUG there were plans to change it to a "give way" sign by October 2014.⁴ The cycleway is separated past 600 Coronation Drive but little space is given to pedestrians who often use the cycleway when present in large groups. Driveways in the area cross the bikeway with no visual indication of legal priority. Instead, the poor "solutions" of flashing lights mounted on walls, "watch for bicycles" and "watch for vehicles" signed are installed at regular intervals. Further along at 44 Brisbane Street ("Chandalay") the bikeway has an "in and out" entrance and exit crossing it where only 50 apartments are present as opposed to the 555 planned for 600 Coronation Drive. Again, the traffic lights at this crossing are routinely ignored by pedestrians and cyclists, and the conflict is exacerbated by poor sight lines over the high brick walls surrounding the apartments.

The poor local design is clearly seen in the "recommended pedestrian crossing point" marked by signs further along Archer Street. Children, elderly residents and visitors should be provided clear protection from motor vehicles in this area.

The CBD BUG proposes cyclist priority along the bikeway with devices to slow entering and exiting traffic. The tens of millions of dollars spent so far on the Bicentennial Bikeway will have their effect significantly diluted if cyclists have to stop at the 600 Coronation Drive entrance as well as at

² <http://www.cbdbug.org.au/wp-content/uploads/1970/01/0/CBD-BUG-letter-to-BCC-LM-re-archer-street-20140707.pdf>

³ <http://www.couriermail.com.au/questnews/west/toowong-residential-projects-flow-in-as-suburb-plays-catchup-according-to-developer/story-fni9r1r4-1227115935838>

⁴ <http://www.cbdbug.org.au/wp-content/uploads/1970/01/0/CBD-BUG-letter-fr-BCC-LM-re-Archer-St-20140805.pdf>

Archer Street 40 metres away and at Chandalay. BCC is a signatory to the Urban Design Protocol which explicitly states that pedestrians and cyclists should be given priority over vehicular traffic. This can be seen in an article explaining the Priority Cycle Crossing trial⁵; the principle will be applied on the North Brisbane Bikeway. In an area containing so much potential for conflict Council should also give serious consideration to the possibility of a tunnel for cyclists and pedestrians which would remove all possibility of conflict. This kind of design is very popular in leading cycling countries such as the Netherlands and in a location such as the planned apartments cyclist facilities of the highest quality should be provided.

In addition, the Council has spent millions of dollars on separating bike riders and pedestrians along the Bicentennial. This separation should continue along the frontage of the building and through the arcade. It is not entirely clear from the plans what is envisaged.

TTM design

The design documents submitted by TTM to date show every sign of being slapdash last minute affairs. Despite feedback from BCC there are continual references in the revised plan to “Centenary Cycleway” (as opposed to “Bicentennial Bikeway”) and “Minchinbury House” (Middenbury House). One sentence contains the phrase “this proposal results a solution which provides a solution” (sic). Cycling and heritage appear to be low order issues for the development as opposed to the all important right turn for motorised traffic into Coronation Drive.

The original TTM document stated that the higher income “residence” (sic) of the towers will not be riding bikes and will prefer motorised vehicular travel and the CityCat. The CBD BUG was astounded by the ignorance of the local context of the development and the scant regard given to people who might choose to walk or ride bikes for transport. Toowong has the third highest modal share for bicycles of all Brisbane suburbs (after West End and Highgate Hill); this is entirely due to the excellent protected Bicentennial Bikeway facility leading from there to the city. Fishman et al found in their research⁶ that “[CityCycle] members are typically younger, more likely to know the distance between their home and work to their closest docking station, [and] have pre tax incomes above \$A104,000 per annum”.

Archer St access to site

At the Archer St access to the site it is indicated that “different pavement treatment / warning hatching” is to applied – possibly to warn footpath users of the possibility of motor vehicles transiting the crossover. However, the surface markings for shared paths / footpaths need to be continuous across vehicle crossovers. Under the Queensland Road Rules it is motor vehicle drivers that must give way to footpath users at such locations and continuous surface markings to indicate a shared path / footpath will contribute to motor vehicle driver awareness of this requirement. This awareness would also be enhanced by a Give Way sign facing exiting drivers at this crossover.

Such surface markings and signage will be critical in the case of this crossover being the sole access point to this site as already called for in this submission. Also, as previously indicated Key Acceptable Solution A9.6 of the Toowong-Auchenflower Neighbourhood Plan requires that “driveway crossovers maintain the integrity, quality and primacy of footpaths”.

Cyclist end of trip facilities

Visitor parking for bicycle riders is an essential ingredient of encouraging people to ride bikes to this site instead of driving private motor vehicles. Accordingly, at each building in the complex

⁵ <http://www.couriermail.com.au/questnews/city/brisbane-cyclists-to-benefit-with-priority-cycle-crossing-trial/story-fni9r0jy-1227105065964>

⁶ <http://eprints.qut.edu.au/75848/>

visitor bike parking must be provided bearing the following characteristics:

- under cover from the weather
- in very close proximity to building entrances, and
- open to passive surveillance to deter thieves.

Pedestrian arcade

Priority should be maintained for cyclists and pedestrians through the pedestrian arcade through the complex. The CBD BUG notes that in a similar project in Perth (over the Claisebrook) existing access was curtailed at the request of residents at a later date and does not wish to see this happen here.

Yours faithfully

Dr Richard Bean
Co-convenor
Brisbane CBD BUG
18 December 2014