

## EPBC Referral No 2023/09753—Commonwealth Park to Woden Light Rail Project

- 1. The Inner South Canberra Community Council (ISCCC) responds to the invitation to comment on the referral of the Commonwealth Park to Woden Light Rail Project under the *Environmental Protection and Biodiversity Conservation Act* 1999 (EPBC Act).
- 2. The ISCCC is the peak body for eight inner south residents' groups, representing thousands of households in the inner south.<sup>1</sup>
- 3. The ISCCC responds that:
  - a. The Preliminary Environmental Assessment and accompanying documentation do not provide an adequate basis for decisions relating to Light Rail Stage 2B. The Preliminary Environmental Assessment states that further studies are required. The ISCCC considers that heritage impacts have not been adequately assessed. Additional studies should be completed before the proposal receives any further consideration.
  - b. Some impacts of Light Rail Stage 2B will only become evident when details of the actual route including bridges and interaction with road traffic are provided.
  - c. The limited referral documentation provided to date demonstrates clearly unacceptable adverse impacts on protected matters including threatened species, migratory species and national heritage places.
  - d. There is insufficient information in the referral to demonstrate how adverse impacts might be addressed.
  - e. There is widespread public concern about the proposal in the referral.
  - f The so-called 'targeted consultation' with community associations such as the ISCCC has not occurred.
  - g. The ISCCC questions whether the referral is in the form required by the Environmental Protection and Biodiversity Conservation Regulations 2000.
  - h The ISCCC considers that the full Environmental Impact Statement should be prepared by an independent party that does not have a vested interest in the proposal going ahead.

<sup>&</sup>lt;sup>1</sup> Deakin Residents Association, Forrest Residents Group, Griffith Narrabundah Community Association, Kingston Barton Residents' Group, Old Narrabundah Community Council. Red Hill Residents Association and Yarralumla Residents Association.

i. When further information about the proposal becomes available, there should be a public enquiry into this proposal either under the EPBC Act or, alternatively, undertaken by the Joint Standing Committee on the National Capital and External Territories.

Yours faithfully

Colin Walters

Chair

Inner South Canberra Community Council

17 March 2024