



Inner South Canberra Community Council

Referrals Gateway
Assessment and Governance Branch
Department of the Environment and Energy

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Referral 2019/8491- Commonwealth Park to Woden Light Rail Project, ACT ISCCC Submission

Pursuant to s74(3)(b) of the *Environment Protection and Biodiversity Conservation Act 1999*, the Inner South Canberra Community Council (ISCCC) submits that the proposed project is a 'controlled action' which should be assessed as required by the Act.

Further, we submit that the assessment should be by an independent public inquiry, established and conducted under Division 7, Part 8 of the Act.

Consistent with the approach advocated by the Griffith/Narrabundah Community Association in its submission on the referral, we believe that Stage 2 of the Light Rail should not be considered further until comprehensive information is provided about the full implications of the project, and a rigorous cost-benefit analysis has been undertaken and published to permit informed public comment.

ISCCC

The ISCCC is a voluntary, not for profit, community-based association operating in the inner south area of Canberra. The ISCCC's objective is to preserve and improve the social, cultural, economic and environmental well-being of Inner South Canberra and the Inner South Canberra community.

We are the peak community representative body in Inner South Canberra representing the interests of residents and communities with representation from or affiliation with:

- Old Narrabundah Community Council
- Griffith Narrabundah Community Association
- Yarralumla Residents Association Inc
- Deakin Residents Association
- Red Hill Residents Group
- Kingston and Barton Residents Group
- Oaks Estate Progress Association
- Forrest Residents Group

ISCCC engagement on light rail project

The proposed second stage light rail route passes directly through the Inner South. The ISCCC has, since the initiation of this project, remained actively engaged in collecting the views of local residents both directly and with the assistance of its member/affiliated residents' groups most likely to be directly impacted.

The ISCCC held public forums which have addressed light rail in 2017, 2018 and 2019. There have also been several recent online surveys by residents' groups to gauge residents' views. This is a complex issue, with differing views and impacts across Inner South Canberra.

We provided a detailed submission in June 2018 to Federal Parliament's Joint Standing Committee on the National Capital and External Territories inquiry (JSC inquiry) into Commonwealth and Parliamentary approvals for the proposed Stage 2 of the Australian Capital Territory light rail project. (Submissions were also provided by the Griffith-Narrabundah Community Association, the Deakin Residents Association, and the Kingston Barton Residents Group.)

The ISCCC endorses the acknowledgement in the referral that the ACT's Community Councils, including the ISCCC (and other key stakeholders, that should include residents groups) require 'targeted consultation' in relation to any expansion of the Light Rail network.

Issues to be addressed

The ISCCC has previously noted that there is a multiplicity of issues that will need to be addressed in any proper consideration of this project, many of which we identified in our submission to the JSC inquiry. These include:

- possible impacts on the heritage aspects of the Parliamentary Zone and Parliamentary Triangle, and other Designated Areas in central Canberra along the Light Rail route, including the proposed new bridge structures and modifications;
- compliance with the National Capital Plan;
- consistency with the requirements of any National Heritage Listing of Canberra (nominations for which we understand are in the final stages of assessment);
- maintaining the key vistas along the main avenues towards Parliament House;
- the need for the National Capital Authority to have an up to date Heritage Strategy to manage places on its mandated Heritage Inventory;
- the need to avoid overhead wires through the Parliamentary Triangle
- the importance of an appropriate standard of landscaping, urban design and infrastructure;
- an analysis of the likely impact of light rail on the car traffic on Commonwealth Avenue, Canberra Avenue, Adelaide Avenue and Kings Avenue transport corridors to gauge the impact on congestion in local suburbs and their feeder streets;
- implications for the built environment and public open space along the Light Rail corridor;
- consideration of the future status of the proposed West Basin development; and
- evaluation of the impacts of Light Rail stage1 after several months of operation in order to draw lessons for stage 2.

Project a 'Controlled action'

We note that in its referrals, Major Projects Canberra (MPC) states that the Commonwealth Park to Woden project is a 'controlled action' because it is predicted to have a significant impact under the EPBC Act relating to the values of:

- the critically endangered golden sun moth;
- heritage listed matters;
- National heritage listed places;
- Commonwealth heritage listed and nominated places, and,
- on Commonwealth land values.

The ISCCC agrees that for these reasons this project satisfies the criteria of a 'controlled action' and should be assessed under the EPBC Act. It is likely that a robust assessment process will identify a range of detailed concerns which will need to be addressed if the project is to proceed.

Assessment approach

The ISCCC notes that MPC proposes that this 'controlled action' be assessed by an Environmental Impact Assessment (EIA). We acknowledge the MPC undertaking that the EIA would be conducted in accordance with both Commonwealth and Territory statutory planning requirements.

However, we submit that the most appropriate form of assessment is an independent public inquiry established by the Commonwealth. The potential impact on key areas of Canberra and its national capital values is such that it would be wholly inappropriate, and indeed undesirable, that the assessment process is auspiced by the Territory.

There is a demonstrable lack of public confidence in the outcome and transparency of a range of planning decisions for developments elsewhere in Canberra under ACT control. There is significant doubt as to whether the NCA has the resourcing and political support to fulfil its mandate of protecting national capital values in the face of pressure from developers and the ACT Government's expressed need to raise substantial revenue from sale of public land, much of it public open space.

For this reason we do not believe that the EIS process proposed by MPC is capable of responding adequately to the very significant environmental, national capital and heritage values likely to be impacted by the project. Nor do we believe that it will offer the same degree of transparency and objectivity as could be achieved by an independent Commonwealth public inquiry with the powers and guarantees provided by the EPBC for this mode of assessment.

To ensure full confidence in the findings of an assessment, it should be conducted at arms' length from the ACT Government and enable a full and public airing of the views and evidence of those many individuals and organisations which will wish to engage in this important process.

Yours faithfully



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Chair

29 July 2019