

George Wilson

To: epbc.comments@environment.gov.au
Cc: Deakin Residents Association (committee@deakinresidents.asn.au)
Subject: Submission #4301 - Commonwealth Park to Woden Light Rail Project, ACT

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

epbc.comments@environment.gov.au

Submission #4301 - Commonwealth Park to Woden Light Rail Project, ACT

The Deakin Residents Association would like to submit that the proposed project - Submission #4301 - Commonwealth Park to Woden Light Rail Project, ACT is a 'controlled action' which should be assessed as required by s74(3)(b) of the Environment Protection and Biodiversity Conservation Act 1999.

Further, we submit that the assessment should be by an Independent Public Inquiry, established and conducted under Division 7, Part 8 of the Act.

DRA fully endorses the objectives of the Light Rail project, especially:

- Objective 5: deliver an affordable project solution to the Territory that drives innovation and provides a value for money outcome.
- Objective 4: provide Canberrans with an attractive, convenient, efficient and reliable integrated public transport system that facilitates choice, increases public transport patronage and reduces car dependency.

We are highly sceptical that the current proposal will achieve those aims. We believe it will do profound damage to the heritage and other environmental values on Commonwealth Land at the heart of the Australian nation.

Deakin Residents Association

The Deakin Residents' Association is a non-profit association incorporated in the Australian Capital Territory with these objectives:

- *to enhance the residential, suburban, social and environmental qualities of Deakin,*
 - *consistent with garden city planning principles,*
- *through participation in community discussion on and input to planning and land management in the ACT, and*
- *advocacy to the ACT and Commonwealth Governments, and before tribunals and courts.*

Membership is open to any resident of Deakin, holder of a residential lease in Deakin, or a person sharing the objectives of the Association.

We share common interests with similar suburban communities through the Inner South Canberra Community Council (ISCCC) and other groups interested in the quality of Canberra's environment.

DRA and the light rail project

The proposed second stage light rail route passes through Deakin. Since the initiation of this project, DRA has collected the views of residents both directly at public meetings and in a survey. The results are on our website at <https://deakinresidents.asn.au/results-of-dra-light-rail-survey/>

Sixty-nine percent of survey respondents believed alternative technologies for electrified transport should be examined. Respondents also needed demonstration of the benefits and cost effectiveness of light rail technology in a Canberra context.

We contributed 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.) We support the submission from the Inner South Canberra Community Council of which we are a member and the points made of the many issues that need to be further considered in any proper consideration of the project.

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 on:

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

The Deakin Residents Association 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.

DRA supports a properly and respectfully designed public transport infrastructure, lane-separated where possible from other vehicle traffic, that is fully compatible with garden city values. We are fully aware of the need to reduce what appear to be inevitable traffic jams and pollution of ever-increasing motor traffic.

While we recognise that, in principle, it should not be the role of the Federal Government to second-guess decisions that are solely the responsibility of the ACT Government, this part of the Light Rail proposal will proceed at vast expense, not deliver its stated goals and in the process damage invaluable heritage values that are the foundation of the nation.

Assessment approach and need for a public inquiry

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 fully endorse the ISCCC submission 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 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.

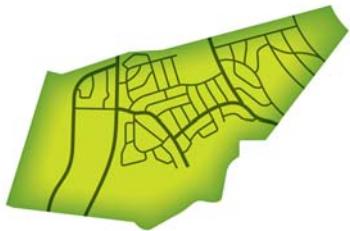
For this reason we do not believe that the EIS process proposed by MPC is capable of responding adequately to the very significant environmental, national capital and heritage values likely to be impacted by the project. Nor do we believe that it will offer the same degree of transparency and objectivity 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

George Wilson
29 July 2019

President
president@deakinresidents.asn.au
www.deakinresidents.asn.au
Ph 62812160



Deakin Residents Association
A garden Community for the Future