



North Canberra Community Council Inc. (NCCC)

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Submission commenting on the Draft Majura Parkway Environmental Impact Statement Report (EIS)

The North Canberra Community Council (NCCC) welcomes the opportunity to comment on the Draft Majura Parkway Environmental Impact Statement Report (EIS). We also appreciate the willingness of the ACT Government to extend the consultation period and to hold the public meeting on 8 July. We believe the level of interest at that meeting indicates that it would be desirable to hold that kind of meeting in future consultation processes - perhaps towards the middle of the EIS process, when initial views are being formed.

Given the rapidly increasing volume of traffic on Majura Road, the NCCC supports a major upgrade of the Road. The NCCC notes, however, that this need has arisen in the context of significant planning failures, including that:

- Gungahlin has been developed without a public transport corridor;
- Canberra Airport has built huge capacities for non-aviation office space; and
- there are few employment opportunities in Gungahlin itself.

The EIS Report

In regard to the EIS, the NCCC considers that key elements of the report are deeply flawed and unacceptable for the following reasons:

- (1) The EIS recommends a **virtually complete realignment** of the current Majura Road, despite the fact that until very recently, Chief Minister Jon Stanhope let it be known that (letter to Peter Kelly, Hackett, dated 11 September 2008):

“The Government considers that ... the **gradual upgrading (of) Majura Road** ... to parkway standard will provide adequate capacity for future traffic.” (Emphasis added)

- (2) The EIS dismissed the option of upgrading Majura Road to Parkway standard (**Upgrade Option**) because it would affect a proposed Very High Speed Train (VHST) corridor through Majura Valley and a proposed VHST terminal at the Airport. This is despite the fact that the EIS identifies the **Upgrade Option as having the least impact on current land use, on conservation and heritage values and as the most cost efficient option in terms of capital layout** (p3, Appendix M, Alternative Options). It has also become clear in the course of recent public consultations that there are significant impacts of a new alignment on recreational biking and on the Girl Guides facility.

- (3) In recommending the expensive and high-impact Majura Parkway Realignment (**Realignment Option**) based on a proposed VHST Corridor with a VHST terminal at the airport (p3, Appendix M,

Alternative Options), **the EIS fails to adequately analyse alternative options.** It rather refers to an earlier Majura Valley Transport Corridor Feasibility Study (GHD 1999). There are a number of problems with this reliance on the earlier study:

- a) The GHD study had very little information available to it about the possible route of a VHST (p.42) and had to make a series of educated guesses. It then recommended that “when the VHST project proceeds” an extensive and comprehensive planning and environmental assessment” of road options be undertaken to ensure compatibility between the road and the rail line. This of course has not happened and yet, in a complete reversal, the EIS has now taken the GHD estimate as the basis of its own assessment for the new alignment.
 - b) The GHD study uncritically assumes that the VHST terminal will be at the airport on the basis of the airport’s own expansion plans, rather than examining their feasibility or the desirability of other options. As the VHST corridor and a proposed Airport terminal of the VHST are clearly one of the main criteria for the preferred Majura Parkway realignment option it would be essential that these issues would be discussed in the EIS, together with alternative options.
 - c) The GHD study is outdated: it assumes, for example, that there will be “Trade Development Zone” (p.43) located next to the airport - a policy which has been long since abandoned. One of the arguments for dismissing the option of upgrading the existing alignment is that “it does lead to significant constraints on possible development zones associated with the Airport” (p.59)
 - d) page 1, 1.1.1 states that the objectives of the earlier Majura Valley Transport Corridor Feasibility Study (GHD 1999) were amongst others: "Identify any desirable variations to the road alignment if co-location with railway was not required". This EIS does not appear to consider these variations
 - e) page 1, 1.1.1 states that the GHD study included amongst other items: VHST and Airport planning. There is nothing in this EIS that refers to these issues
- (4) **The EIS thus argues for the most economically and environmentally costly option** based on proposals regarding a VHST connection to the Canberra Airport that have not been publicly scrutinized. Quite apart from the question whether a VHST will ever be built, NCCC considers the plan to keep the VHST away from the Canberra CBD completely unacceptable. We have not seen a proposal, nor a detailed plan or a triple bottom line analysis for the scenario of a VHST corridor in the Majura Valley. **Taxpayers and the ACT community thus are being asked to subsidize the Canberra Airport ambition to become the second Sydney Airport.**
- (5) The EIS fails to compare the traffic flow improvements between the Upgrade Option and the Realignment Option, but rather compares traffic flows between the Realignment Option and the current situation on Majura Road. **NCCC requests to see an analysis of traffic flow improvements comparing both options.**
- (6) NCCC is aware that ACTPLA is currently conducting a Majura Valley Broad Acre Study (MVBAS). This EIS must have a clear impact on this study at a time where the MVBAS is not yet publicly available. **NCCC requests that this EIS and the MVBAS should be publicly discussed together.**
- (7) NCCC sees a real danger that the community will feel misled with this EIS, especially because major consideration is given to misguided plans to provide VHST access to the Canberra Airport, rather than to the Canberra CBD and Federal and ACT Government Agencies. **Planning is thus driven by implicit support for Canberra Airport’s plan to become Sydney’s second airport and an airfreight hub.** The community, including NCCC have consistently argued that these Airport business plans will destroy the unique assets of Canberra as a liveable city.

Other issues

The NCCC supports the decision by ACT Roads to remove the Kowen and Northern links from the Parkway project. This is a soundly based decision and demonstrates the importance of an EIS process.

With kind regards,



Jochen Zeil
Chair, North Canberra Community Council
12 July 2009

Cc: Jn Stanhope (Minister for the Environment), Andrew Barr (Minister for Planning), Tony Gill (Director, TAMS-Roads ACT), ACT Commissioner for Sustainability and the Environment, NCCC Executive Committee