29 November 2010

Submission Regarding the
ACT Eastern Broadacre Economic and Strategic Planning Direction Study
(ACTEBESPDS)
or, for the purpose of this document, the
Planning for Eastern Broadacre Discussion Paper
(PEBA)

(1) **Executive Summary Statement:** The PEBA lacks vision with regard to the development needs of Canberra and the Region facing Climate Change, while it should and can be an opportunity to define a long-term vision to develop Canberra and the Region in a sustainable way, responding to Climate Change and other potential threats. By considering Majura Valley as a traditional light industry employment corridor, PEBA reflects business as usual, neglecting crucial aspects such as induced traffic, fragmentation of unique and endangered ecological communities and the need for Canberra to become a more compact city. Most importantly, it builds its considerations on seriously flawed, insufficiently investigated and ecologically damaging projects, such as a realigned Majura Parkway, a totally misconceived potential corridor for a Very Fast Train and the establishment of a new township at Kowen Forrest, which flies into the face of any reasonable attempt to reduce the region’s ecological footprint. The potential of Majura Valley to become Canberra’s sustainable food bowl, to provide permanent protection to Australia-wide unique endangered grassland communities and to combine this with solar power generation are not even considered. The PEBA reflects an old-fashioned, un-inspired and un-informed view of the Region’s potential to become smart by facing the challenges of Climate Change. PEBA marches at high speed back into the 19th century.

(2) **Context 1:** The suggestions considered in PEBA, especially for the Northern part of the Broadacre Area, solidify the disaster of non-aviation development at the precinct of Canberra Airport, in particular in relation to induced traffic.

(3) **Context 2:** PEBA considers the re-alignment of Majura Parkway as practically given, despite the fact that the Draft Majura Parkway Environmental Impact Statement Report (EIS) in 2009 made clear (see NCCC Submission commenting on the Draft Majura Parkway Environmental Impact Statement Report (EIS), 12 July 2009):

(a) that the Upgrade Option would have the least impact on current land use, on conservation and heritage values and would be the most cost-efficient option in terms of capital layout;
(b) that the high-impact Majura Parkway Realignment Option is based on a proposed VHST Corridor with a VHST terminal at the airport and that the EIS fails to adequately analyse alternative options;
(c) that 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;
(d) that 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.

(4) **Context 3:** The PEBA, like the Majura Parkway EIS, again is heavily influenced by the ill-conceived, un-substantiated and by all accounts ridiculous suggestion that a potential VHST link between Sydney and Canberra should run along Majura Valley. These trains are supposed to connect city centres, not international with provincial airports. Consequently, in countries with proper rail infrastructure, high speed trains are called InterCity, not InterAirport.
(5) **Context 4:** The suggestion to make Majura Valley into a light industry and freight industry corridor undermines the low-carbon economy planning needs in Canberra, where the main issue is to provide employment close to where people live, not to create another wave of induced traffic, consisting of up to 50% single passenger four-wheel drives. A truly creative solution to this Canberra-endemic problem would be to locate employment opportunities not in Majura Valley, but in Kenny, close to the Federal highway and close to Gungahlin and North Canberra suburbs.

(6) **Context 5:** The PEBA addresses squarely the problem of the continuing fragmentation and isolation of endangered ecological communities, but then proceeds in the traditional manner of giving highest priorities to development, to road infrastructure and to accommodating car dependence. It fails completely to consider the noise pollution effects on existing nature reserves.

(7) **Context 6:** The PEBA fails to question two assumptions: (a) that it is reasonable and sustainable to continue to subsidize and support the expansion of the non-aviation activities of Canberra Airport, despite the fact that the costs of induced traffic are huge and (b) that Canberra should proceed with the development of the Kowen Township, despite the fact that it lies well beyond the 7.5 km radius of city compaction that is needed to reduce Canberra’s - in a global comparison massive - ecological footprint.

(8) **Context 7:** A radically revised PEBA will require an accurate, comparative environmental data analysis with estimated CO₂ emissions and their effect on ACT emission targets for ALL options, including comparing the current one that is mainly driven by Canberra Airport interests, with huge industrial, cargo and passenger traffic generation, with one that emphasises sustainable food production, renewable energy production and adequate, long-term conservation of endangered ecological communities.

**In conclusion:** NCCC considers the PEBA to be based on irresponsibly outdated ways of thinking, in particular with regard to the opportunities offered by Climate Change. It is further based on unsubstantiated traffic infrastructure plans, such as the Majura Parkway Realignment and the potential VHST corridor. It lacks the evidence-based vision that is desperately needed, if Canberra is to stand a chance to become a model of a sustainable city.

In short, all agencies involved in the “Planning the Eastern Broadacre Area” Study will need to go back to the drawing board and be prepared to be informed by the requirements of a Low Carbon Economy and to seriously confront the challenges of Climate Change.

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