

**COMMENT ON COMMONWEALTH PARK TO  
WODEN LIGHT RAIL PROJECT**

EPBC No. 2023/09753

PUBLIC TRANSPORT ASSOCIATION OF CANBERRA



The Public Transport Association of Canberra (PTCBR) appreciates the opportunity to comment on the Commonwealth Park to Woden Light Rail Project EPBC Act referral. It is clear that the Project is a controlled action under the EPBC Act, as indicated in the project documentation submitted, insofar as it impacts the protected matters of National Heritage, Threatened Species and Ecological Communities, and Commonwealth Land. PTCBR would like to take this opportunity to comment on the first and third of these areas. We urge the Minister and Department to view the Project in its correct context as a vital part of Canberra's future as a sustainable and livable city, and to give fair but not undue weight to heritage considerations relevant to this project.

We refer to sections 4.1.2. National Heritage and 4.1.10 Commonwealth Land in the main referral document and relevant aspects of the appendices, especially Appendix H. In these materials, the Project's impacts on heritage-listed items are treated as inevitable and largely negative. While this is in keeping with the scope and requirements of this referral, we note that the Project and its approvals process present a rare and important opportunity to examine attitudes towards heritage in our national capital. The imperative to preserve heritage-related features in Canberra is often justified as something being done on behalf of the Australian people, who are presumed to value and desire this preservation. This can be seen clearly in Appendix H, 4.3.2 Types of Heritage impact, page 41, which lists the following as an "indirect heritage impact":

*the 'community perception' about future 'changes' to the heritage environment, which is culturally, socially or symbolically significant. For example, there may be indirect impacts on the symbolic and intangible nature of the heritage values in the study area. These could be impacts on community-held values. The impacts may be 'actual' or a community perception that change, of any kind, is negative if it relates to a significant heritage environment such as the central national area of Canberra. Therefore, communication about the positive benefits to the heritage values would be necessary.*

This point is entirely speculative - it presents no evidence that such opinions on heritage are held in significant proportion in the community. It contains the assumption that the community will perceive any changes to heritage-listed items negatively and that a positive communications strategy would be required to gain public acceptance. From PTCBR's years of advocacy for better public transport in our national capital, we suggest that this is a profound misreading of community sentiment - whether that community be the general Australian population or residents of Canberra. We regularly hear from residents and visitors alike who find the National Triangle and surrounds alienating, unfriendly, and difficult to access by public transport - poor outcomes for an area that should be a welcoming and warm place for all. It's important to note that while Australians are proud of our heritage, we are also a highly urbanised nation, a climate-conscious nation, and an innovative nation, and we wish to see those preferences and values represented in our national capital city and given at least the same weight as the need to look after the historic built environment.

PTCBR notes that, when considered in a global context, the lack of development and public amenity around our seat of national parliament is unusual, as is the imperative to control and/or preserve elements such as vistas, views, and lighting

arrangements around the Parliamentary Triangle. Parliament House and the landscaping and roads immediately surrounding it are young artefacts when considered in a heritage-conscious context, and so the myriad requirements for the treatment of the built and natural environment in this area seem unusual at best and arbitrary at worst. The preservation of Old Parliament House seems the more urgent task as it is a more historically significant building – but the choice last century to construct a new parliament house overlooking the old, and to surround it with arterial roads, indicates that pragmatism can and does win out against heritage concerns in certain circumstances; while State Circle is part of the original plans for Canberra’s layout, it is hard to imagine that the Griffins could possibly have intended to have important parts of the city segregated from daily life by vast, busy roads. A logical framework governing planning and development decisions in the National Triangle and surrounding areas is difficult to discern.

Heritage is but one of the factors that must be considered when evaluating this project. We urge the Minister and Department to take an appropriate view of heritage considerations connected to the Commonwealth Park to Woden Light Rail Project.