



Mr Ben Morton MP  
Chair of the Joint Standing Committee on the National Capital and External Territories  
PO Box 6021  
Parliament House  
Canberra ACT 2600

Email: [jscncet@aph.gov.au](mailto:jscncet@aph.gov.au)

## **Inquiry into Commonwealth and Parliamentary approvals for the proposed Stage 2 of the Australian Capital Territory light rail project**

Lake Burley Griffin Guardians (the Guardians) uphold all points made in our original Submission (# 6) and at the Inquiry 21 June. Due to questions and comments at the Community Groups' roundtable session we present the following additional information.

### **Extension to Point 2: the roles of the National Capital Authority and the Australian Government, and the associated approval processes;**

#### **NCA Process**

The Guardians note the NCA must comply with *Environment Protection and Biodiversity Conservation Act 1999*. A heritage management plan — *The Parliament House Vista Heritage Management Plan Vol 1* by Marshall et al 2010, details conservation protection policies for the entire Parliamentary Vista area including the buildings, their curtilage and the parkland setting of gardens, walkways-pathways, views and vistas, water-features, trees, their interrelationship and relationship with Lake Burley Griffin.

A first step, in following the statutory Commonwealth process for any proposal here, is that it be tested against the requirements of the Marshall 2010 Plan and the preparation of a heritage impact study. However, it should be recognised that the Parliamentary Vista's boundary does not encompass the entire impact area of Light Rail Stage 2 within the area managed by the NCA. For this larger area, caught by Amendment 86 to the NCP (Item 2.4) best practice heritage planning should occur where heritage (of any level of significance) is identified, even though formal statutory listings may not exist for the place

The question also needs to be asked whether there is currently sufficient detail available at this stage to properly assess the Stage 2 Light Rail proposal in the required impact assessment process.

An obvious concern here is that Canberra's central national area — the Parliamentary Triangle also known as the National Triangle belongs to all Australians. The responsibility to carefully manage that area and undertake consultation, more widely than if it was local heritage — with Australian citizens, must be pursued effectively by the NCA.

For particular features within the impact area of proposed light rail route, information from statutory heritage listings and nominations, by the ACT and Australian Governments as well as by non-government organisations such as the National Trust of the Australia and Heritage Engineers should be considered. The identification of some of these items may post-date the Marshall 2010 Plan. All of these should already be identified in an up to date NCA-required Heritage Inventory.

There are formal processes to be observed including seeking Commonwealth approval. Cumulative impacts on heritage will also need to be considered.

The NCA must develop/refine a consistent decision-making process for works or actions affecting the area, particularly the loss of national property and lands. We note that highly acclaimed and recognised heritage values within the Designated Area, are to be considered as Commonwealth heritage (NCP Item 2.4) although not finalised as heritage listings.

Decisions made by the NCA need to have independent heritage advice particularly as members of the NCA Board all represent ACT Business. Heritage expertise should be an integral component within the NCA Board.

**Extension to Point 3:  
possible impacts on the Parliamentary zone and Parliamentary precincts, including any impacts on the heritage values and national importance of the Parliamentary zone and our national capital;**

The Parliamentary/National Triangle area delineated by Kings and Commonwealth Avenue and Constitution Avenue is a most significant area set within the framework of the three hills (Capital Hill, City Hill and Russell) and with the Lake traversing the triangle this open landscape gives a spatial dignity to Canberra.

The Parliamentary Zone extending from Parliament to the Lake is the physical expression of our democracy with key features our democracy set in a landscaped parkland setting. This important area should be protected and kept as such for future generations. This does not

mean freezing it in time as the Parliamentary Zone must retain its democracy heritage elements and purpose for future generations.

### **Light Rail Route**

The proposed route of Stage 2 Light Rail by the ACT Government impacts the Nation's heritage — highly adversely cutting cross the ceremonial avenues of Commonwealth and Kings Avenues causing many historic trees to be removed, damaging the elegance and form of whatever bridge is used and the intrusion of a significant infrastructure of concrete, rails and stations. We also understand wireless routes requiring safety barriers.

At the Inquiry we noted that tram/streetcar routes were prepared by the Griffins in 1912 and by W. Burley Griffin in 1915. Copies of those plans are attached both plans indicate a street-car route following the outline of the Parliamentary/National Triangle but we are unaware if there was ever a definitive policy on these tram routes.

If Light Rail Stage 2 is to be pursued following the route shown in the Griffin plans outlining the heritage area of the Parliamentary/National Triangle, Constitution Avenue may be too narrow and much wider Parkes Way may be more feasible and still service the same area. The Kings Avenue Bridge is the shortest lake crossing and running straight up Kings Avenue to State Circle, the route would service high-density work area hubs of the new NSW University, ASIO, Defence Department at Russell, and Barton, while providing easy access to the Parliamentary zone including Parliament. Although this route may be slightly longer it appears it would service larger work force hubs than prescribed in the ACT Government's proposed route. Furthermore, in this location a future extension to Canberra Airport and the businesses located there would be achievable.

Any route within the Designated Area should be wire free.

The Guardians note that there has not been sufficient research of options and much more research is required to determine how this fits with overarching city and traffic planning and the Y plan, costs, and future costs as well as advancing technology that may provide a more feasible outcome.

### **Trees**

We suggest that the JSCNCET urge the NCA to obtain heritage protection of the Griffin/Weston plantings before the Australian Government gives any necessary approvals for light rail south of the lake.

In 2013, the NCA commented on the varying condition and suitability of trees along Kings and Commonwealth Avenues in a paper entitled *Renewal of Kings and Commonwealth Avenue - Background and Issues, May 2013*. This paper canvassed the reasons for the

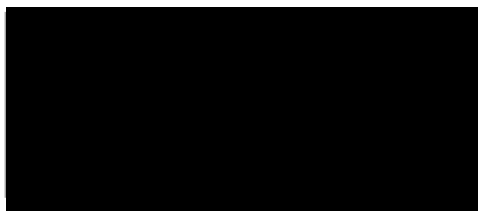
decline of some of the Weston plantings and proposed various options to respond to their inevitable demise.

Importantly, the NCA made three recommendations about tree heritage, as follows:

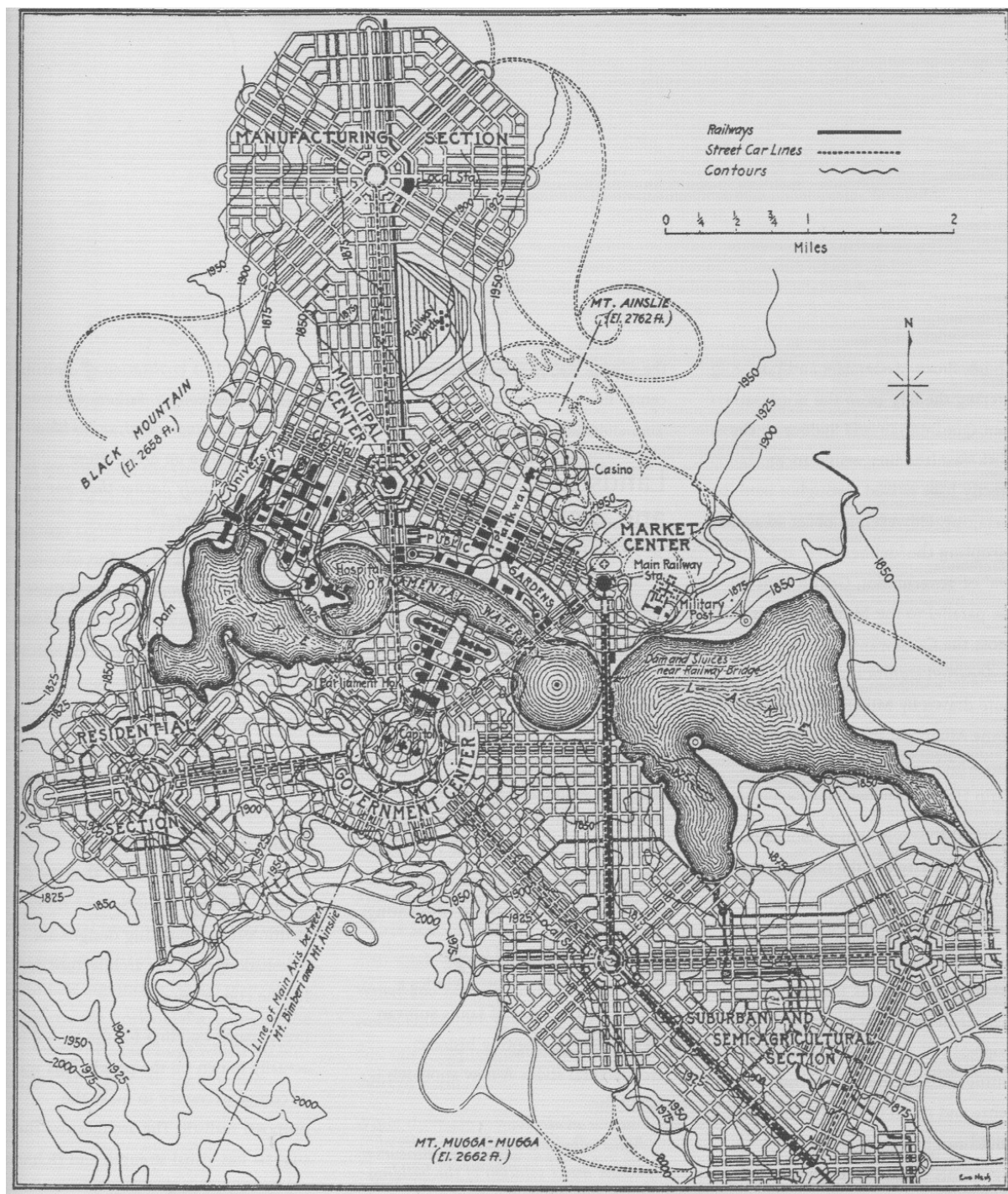
- *Repair the heritage plantings from the Griffin/Weston era and extend to the lake and to State Circle adjacent to Parliament House.*
- *Work with the ACT Government to ensure City Hill is maintained consistent with its heritage value*
- *Pursue Heritage protection for the Weston/Griffin plantings.*

Lake Burley Griffin Guardians are concerned that the NCA's stated intention to seek heritage protection for the Weston/Griffin plantings appears not to have been included in its submission to the JSCNCET and its acquiescence to the trees' destruction on the condition that 'an appropriate reforestation strategy is in place' is inconsistent with its previous intent and should be ignored.

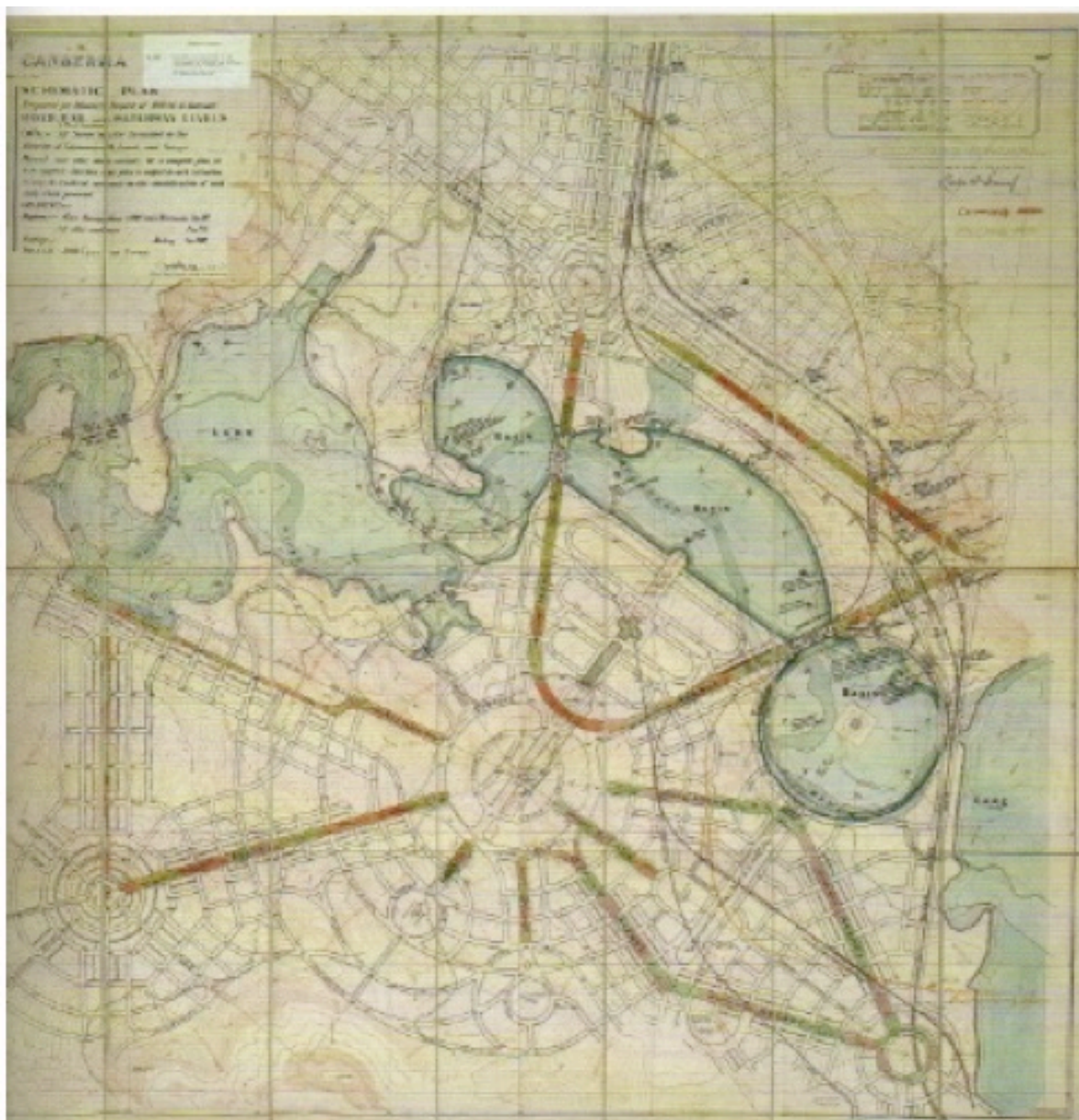
We support the NCA's desire for a long-term strategy and a consistent approach to staged replacement planting along Commonwealth and Kings Avenues. We further note that Commonwealth Avenue is the ceremonial route to Parliament and trees need to have the strong evergreen character of the existing species.



Prepared by Lake Burley Griffin Guardians:  
Juliet Ramsay (convenor)  
Richard Morrison  
Mike Lawson  
Marianne Albury-Colless



Plan of Canberra showing streetcar routes, drawn by the Griffins in America and dated 2012. Image scanned from Canberra Following Griffin by Paul Reid, p.79.



**Griffin's schematic plan of roads, rail and waterway levels of 2015 scanned from *Canberra Following Griffin* by Paul Reid, p.131.**