

Parliamentary Standing Committee on Public Works
Suite R1 119 Parliament House
CANBERRA ACT 2600

Dear Committee Members

**PROVISION OF FACILITIES
FOR HEADQUARTERS JOINT OPERATIONS COMMAND, NSW**

1. Thank you for the opportunity to make a submission to the Committee on the above issue from the Queanbeyan-Monaro Greens Group.
2. Our comments will focus on three broad areas: justification for the project; the financing arrangements; and the environmental and social impacts.
3. We believe that the project should not proceed in the proposed location because:
 - the potential negative impacts outweigh any benefits;
 - of the security risk for nearby residents and the environment associated with the project;
 - there is insufficient detail about the financing arrangements; and
 - a number of environmental and social impacts have not been satisfactorily addressed.
4. We also note that the Minister for Defence has pre-empted the planning process by announcing on 16 March 2004 that the Government was seeking tenders to build, operate and conduct security at the proposed complex. However the Minister for the Environment has still not announced whether the complex should proceed given a range of environmental and social concerns raised in response to the draft Environmental Impact Statement (EIS).
5. While we oppose the project proceeding, our submission includes comments about measures that should be taken in the event that the project is approved.

6. We wish to forward a copy of this submission to the Ministers for Defence and for Environment, as well as to the local Federal and State members and the opposition candidate for the Federal electorate. We seek the Committee's permission to do so. If this cannot be given immediately then could we please be informed when the Committee has authorised publication of submissions.

Signed by Katrina Willis

Convenor

on behalf of the Queanbeyan-Monaro Greens

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PROVISION OF FACILITIES FOR HEADQUARTERS JOINT OPERATIONS COMMAND, NSW

Introduction

1. The Queanbeyan-Monaro Greens is a local group of *The Greens NSW* and draws members from Queanbeyan, Burra, Bungendore, Carwoola and Williamsdale. As a constituent group of *The Greens NSW*, members of the Queanbeyan-Monaro Greens (QMG) are guided by the four principles of ecological sustainability, social justice, peace and non-violence, and grassroots democracy.
2. Given the scale of the proposed development and its wide-ranging impacts on the communities from which the QMG draws its members, the group wishes to make a submission to the Committee and to be included in future community consultations on the project.

Security risk

3. The draft EIS and the Department of Defence submission to the Committee stated that the project was justified on the grounds that it will bring together several defence units that currently operate in separate locations in Sydney and the Blue Mountains. A key role of this new centre would be to coordinate high-level military operations.
4. QMG questions the wisdom of locating what could well be a prime target so close to urban areas. We query the conclusion in the draft EIS about the risk associated with the project. The co-location of the units involved in coordinating high-level military operations seems to us to increase the risk of an attack, exposing those people on site and nearby to serious injury or death. Further such an attack on a concentrated target could severely disrupt defence co-ordination and logistics. We disagree with the description of the site as being remote from built up areas and with the conclusion, therefore, that the project is a “relatively safe one”. The site is in fact only 14km from Queanbeyan, 8km from Bungendore and closer still to rural residential areas such as Carwoola and Weetabalah. It is also near a major roadway and to the Canberra to Sydney railway line.

5. We note the draft EIS stated that a risk assessment was undertaken but that it did not extend to risks related to operational security, such as the possibility of a military attack, because Defence would address this independently. We believe the public should be advised of the full range of risks associated with the project and an assessment of them. This information should be included in the final EIS.

6. The security risk assessment that was undertaken as part of the EIS identified several medium-risk threats, including a bomb threat and a terrorist attack. On the one hand the risk assessment stated that a terrorist attack on Australia was unlikely, while at the same time it stated that regional terrorist organisations pose a credible threat to Australian interests, and that some regional terrorist organisations may have cells operating within Australia. The risk assessment also states that: “The prominence of HQAST and its involvement in future operations may make it a target (for a bomb)” (Draft EIS Appendix K, pg 14).

7. Little consideration seems to have been given to address dangers to the neighbourhood population, which is ironic given Defence’s prime function is presumably to defend Australian citizens. Defence will no doubt have backup arrangements if their site is disabled but the nearby residents of the local government areas could well become casualties.

8. Our concerns about the security risk that HQAST would pose are strengthened by events such as those surrounding the arrival in Australia of a French national, Willie Brigitte, who was granted a tourist visa to enter Australia even though it has been reported that the French government had identified him as a terrorist suspect. In addition, it has been reported that Brigitte intended to attack the Lucas Heights nuclear reactors. While the Australian government now says it has no evidence that Brigitte was planning an attack on Lucas Heights, it maintains that he was in Australia with the intention of causing some harm.

9. In the face of such events and the statements in the draft EIS about the security risk of the site, we believe it is not possible to conclude that the risk is of a nature as to be able to describe the project in its proposed location as a “relatively safe one”.

Costs and financing arrangements

10. The projected cost of the HQAST proposal is now \$318 million. This is a substantial amount of public funds and more information should be provided to demonstrate the necessity of this outlay. We note that the draft EIS refers to a document prepared by Sinclair Knight Merz, HQAST Business Case, March 2001, but the document does not appear to have been included in the draft EIS. We would ask what justification there is, if any, to withhold this information from the public.

11. While we do not support the construction of HQAST in any location so close to habitation, were it to proceed, we have concerns about involvement of a private entity, particularly when the public has been given no details about the scope of its role. We believe that the final EIS should contain more information about the alternatives for project procurement. This information should be made public before the Parliamentary Public Works Committee commences its examination of the project. The reason we believe this disclosure is required is because we are dubious of claims that private financing will provide value for money. There is ample evidence within the Australian Public Service in general, and Defence in particular, of cost overruns in relation to privatisation of services and the procurement of equipment.

12. In addition, it has become common practice for governments in all spheres to use the involvement of private financing in various public projects or enterprises as justification for withholding information from the public. This is usually done under the catch all phrase 'commercial-in-confidence'. The Greens oppose this practice of withholding from the community information about financial arrangements involving public entities. Were a private entity to be involved in financing the HQAST project there is the potential for withholding a great deal of information about the project from the public under the excuse that it is 'commercial-in-confidence'.

13. If the project is to proceed, then it is imperative that information not be withheld from the community. The onus should be on Defence to justify why information should not be made public, rather than an automatic presumption that any information may be withheld from the public on the claimed grounds that it is 'commercial-in-confidence'.

Impacts

14. There are a number of substantial negative or untested impacts from the project. Our comments relate to environmental and social impacts.

Environmental Impacts

Water

15. The use of grey water recycling and collection of rainwater are valuable components of the proposed water management plan of the HQAST. However, we are concerned about the overwhelming reliance on bore water. The draft EIS stated that the recharge of aquifers is unlikely to be more than 1% of mean annual rainfall (12.2.3) Significantly, the EIS went on to state that: “Estimating the long term rates of recharge is hard because of the number of variables involved, including the rainfall reliability. Given these statements, we are concerned about the impact of the HQAST taking 25% of the estimated annual groundwater recharge.

16. As with a number of impacts on which this submission comments, it is not possible to look at the impacts of the HQAST in isolation from future needs. The *Canberra Spatial Plan* has identified the area known as Kowen, near the proposed site, as one of the major areas for future residential development. In addition, the village of Bungendore, already dependent on bore water, is under pressure from new residential developments and further proposals, even though there is doubt about access to potable water. The draft EIS did not appear to address the potential of cumulative impacts on water. In addition, should the calculations contained in the EIS prove to be ill-founded and/or should we continue to experience long periods of low rainfall, then the amount of water required by HQAST from the two bores on site could account for substantially more than 25% of estimated annual groundwater recharge.

Building standards

17. The draft EIS stated that the 1996 Building Code of Australia is to be benchmark for the project but as the EIS points out in a separate section, the building code is being reviewed and made more ecologically sustainable. If the HQAST were to proceed it should be used as an opportunity to demonstrate the highest standards in environmental building design and function.

18. Encouragingly, Defence has already shown initiative for worlds best Green buildings in sponsoring the World Green Building Council summit held in Australia. Leading international experts who attended the World Green Building Council summit and the inaugural national Green Building Conference, also recently held in Australia, said that new commercial buildings can and must fully satisfy the requirements of ecologically sustainable development. Buildings that can run self sufficiently also are ultimately much cheaper.

19. We believe that Defence should give an undertaking to apply standards for design, construction and ongoing use of the HQAST that go far beyond the 1996 building code. In addition to the revisions being proposed for that code there is ample information available from Commonwealth and state agencies about the use of sustainable principles for new buildings. While noting the comment that security requirements will constrain the application of ESD principles, every effort must be made to apply these principles to the greatest extent possible.

Transport

20. The draft EIS assumed most people working at HQAST will travel by private vehicle and plans to provide 1,000 car spaces. The greenhouse gas emissions associated with this do not appear to be addressed.

21. Potential congestion at YassRd/BungendoreRd/ Ellerton Dr in Queanbeyan is identified but dismissed. Would traffic lights be required to replace the roundabout? If so, would the Greater Queanbeyan City Council be required to pay for installation? More attention also needs to be given to the intersection of the Kings Highway with Captains Flat Road, which is already difficult to negotiate safely; is the only direct access route from Captains Flat, Hoskintown and Carwoola to Queanbeyan; and is on the school bus route.

22. We do not share the optimistic view expressed in the draft EIS about the capacity of the Kings Highway to carry the kind of increase in traffic flows that the HQAST would generate. The estimates of traffic volumes used appear questionable and should be correlated with Council estimates. The road is in poor repair in parts and is mostly one lane only in each direction. More attention needs to be given to the potential impact on accident rates. Defence itself should be conscious of the likely risk to its own personnel working various shifts day and night. Even if the roadway were capable of taking the increased flows now, the pavement would deteriorate under such a substantial increase in traffic. Provision needs to be made for upgrading the road.

23. The main access road to the site connects to the busy Kings Highway. Sabotage action taken in an emergency situation, as simple as a couple of burning tankers at this intersection, could disable urgent road access to the site. Defence should be concerned about the security of its access to the facilities.

24. The draft EIS stated that Defence is investigating provision of a peak-hours bus service. Such a service is essential and should be included in the final EIS. It is a means of reducing the traffic that HQAST would generate and it is a means offsetting greenhouse gas emissions. Incentives can be used to encourage staff use of such a service. Any parking and traffic congestion can be dramatically reduced by offers or incentives or even disincentives to car users when alternative transport is supplied.

25. Were the HQAST to proceed, it provides a good opportunity to improve public transport in the district, with not only a bus service for Defence personnel travelling in peak hours but also a regular public transport service operating between Queanbeyan and Bungendore. We request that Defence raises this matter with the NSW transport authorities before any decision is made on whether the HQAST should proceed.

Greenhouse gas emissions

26. Enhanced climate change is one of the most serious environmental threats facing the planet, with grave implications for all life. Energy conservation, a greater use of renewable energy sources, and mitigation of greenhouse gas emissions are essential actions required to address the threats posed by enhanced global warming.

27. The draft EIS did not appear to contain any proposals for reducing greenhouse gas emissions generated by the HQAST, other than limited design measures and stating that gas may be an energy source. Has consideration been given to sustainable energy supply – eg photovoltaic (PV) cells on the building? If not, why not?

28. Abatement measures are essential. If it is not possible to use PV cells then an alternative could be buying 100 per cent renewable energy from Country Energy or ACTEW/AGL. We are aware that the Commonwealth Department of the Environment and Heritage purchases 100 % of its energy needs for operations in Canberra through an accredited Green Power scheme. This is the least that any government operation should be required to do, particularly one that will have such a large environmental footprint.

29. In addition, proposed amendments to the Building Code of Australia (BCA) incorporating mandatory energy efficiency measures should apply to the project. The draft EIS referred to the project being undertaken under the 1996 BCA. It is imperative that the project uses the highest standards, particularly as Defence has made much publicly of its commitment to principles of ecologically sustainable development. This also would provide an example to other agencies.

Social Impacts

30. An estimated 1,000 people will work at HQAST. According to the Federal Member for Eden-Monaro, Gary Nairn, this would generate approximately 3,000 new residents to the district (media release 29 January 2003). It is inevitable that this number of people, particularly if they live in Queanbeyan, will have a significant impact on the social services.

Housing

31. The availability of affordable housing is a growing concern in Canberra, Queanbeyan and Bungendore. The draft EIS stated that the HQAST is likely to place pressure on the housing and rental market in the area, and that Defence Housing Authority is currently assessing the housing needs to be generated by the facility. The final EIS must include details of how Defence intends to ensure that the housing needs of employees working at HQAST do not put pressure on the housing and rental market.

32. It is inadequate for the draft EIS to simply state that Defence is talking to the ACT Government about the designation of Kowen in the *Canberra Spatial Plan* as a major area for urban development in the next few decades. The fact that Defence is discussing the matter with the ACT Government leads us to conclude that Defence envisages some potential problems were the Kowen area to be developed.

33. We believe that any potential problems should be made known to the public so that it is possible to judge the full potential impact of the HQAST project. This is a substantial project, in terms of the financial investment and the size of the site. If operations at the site were to be hampered by residential development in the Kowen area, then the life of the HQAST could be shortened, incurring further financial costs. Conversely, if the establishment of HQAST at the site were to prevent development at Kowen, then the public ought to know that now, because such a consequence has implications for the future planning of Canberra and surrounding areas.

Health and childcare services

34. The draft EIS acknowledged there were implications for the provision of health, education and childcare services if the project proceeds. Queanbeyan has a shortage of primary health care services, in particular GPs who have closed off their books to new patients. Eden-Monaro has one of the lowest rates of bulk billing of any electorate in Australia and the lowest in NSW (37.5% for the September quarter 2003). In addition, planning is underway for a new hospital but it is not envisaged that it will be a major hospital that could cope with a large emergency at HQAST. Further, health services, including hospital services, in the ACT are already strained. We suggest that the outcome of proposed discussions with ACT and NSW health authorities should be included in the final EIS so that the community can judge the full impact of the HQAST proposal on health services.

35. The EIS identified a need for 66 pre-school and after school care places and stated that Defence is investigating provision of a childcare centre at some location yet to be determined. There are waiting lists of over 12 months in most pre-school and day care centres in Queanbeyan. For this reason alone, it is essential that Defence makes provision for the childcare needs of its staff. In addition, The Greens believe that large employers, including public entities, should provide childcare services on-site when this is appropriate. Details of proposed childcare services should be included in the final EIS.

Effect on nearby residents

36. Residents nearby the site (in particular the Carwoola area) are concerned about the visual impact of the HQAST as the complex would be visible from up to 136 properties in Carwoola. Noise from building and ongoing activities is also a concern. The draft EIS seemed to downplay the visual and noise impacts on nearby residential areas.

37. Given the estimated construction period of 2.5 years, it is essential that the proposed mitigation measures are strictly adhered to. We would suggest that evening and weekend work should not be permitted other than in exceptional circumstances. More detail should be provided in the final EIS on how design features are proposed to reduce the visual impact of the site.

Community Consultative Working Group

38. We believe a community consultative working group is essential if the project proceeds but it does not appear that any information has been provided on how such a body would be composed and the diversity of representation. This detail should be included in the final EIS so that the community has a thorough understanding of the proposal in order to assess it.

Conclusion

39. We note that supporters of the HQAST consistently point to the forecast economic benefits of the project, in particular jobs to be generated, while failing to address the costs – environmental and social – of the proposal.

40. The Queanbeyan-Monaro Greens agree that generating employment is important for this area but we do not support economic development at any cost. We oppose the construction of the Defence Headquarters Australian Theatre in this location or similar area so close to habitation because we believe the negative impacts outweigh any benefits. Our objections relate to the security risk to residents and the environment, concern about the cost of the project, and a number of environmental and social impacts set out above.

41. The draft EIS also failed to address the detail of several critical social issues and the financing arrangements. In addition, the reliance on groundwater and the apparent absence of measures to mitigate greenhouse gas emissions are cause for concern. However, if the project is to proceed, then we believe a number of measures need to be taken and more information must be supplied in the final EIS.