4 September 2025

Conservation Council ACT Region: Submission to the ACT Government Light Rail Stage 2B EIS

The Conservation Council ACT Region (the Conservation Council) is pleased to provide input to the public consultation on the ACT Government Light Rail Stage 2B EIS.

The Conservation Council is the leading environmental advocacy organisation in Canberra and hub for over 40 community groups. Our mission is to protect nature and safeguard ecosystems in the ACT and region. We also support broader initiatives to counter regional and global climate change.

We are a non-profit, non-government organisation that runs campaigns, promotes and upskills local groups, undertakes research, advocates passionately, and engages and informs our community.

This submission has been drafted by the Conservation Council's Transport Working Group, with support from our Biodiversity Working Group. To this end, our comments relate both to biodiversity impacts from the construction of light rail, and to the design and amenity of the light rail and stations.

Summary and key points

The Conservation Council continues to support the development of Canberra's light rail network and endorses the preferred route.

We note some significant concerns about habitat destruction related to the proposal. In this document we suggest that the Government do more work to

address the destruction of critical habitat, including reducing impacts where possible, and ensuring effective offsets are used where impacts are impossible to avoid.

Another key issue for the success of the project continues to be the careful integration of the Light Rail system into the wider network of modes of transport, particularly active travel such as walking and cycling. Overall, the Light Rail Stage 1 has done this well in many areas – for which it should be commended. However, it is important that we learn lessons from this first stage. The Stage 2B route also presents some specific challenges requiring detailed examination. These are discussed below.

The Conservation Council also recognises that some of the matters raised fall outside the scope of the Light Rail project itself. However, given their importance to the success of the project, they require close attention by the ACT Government (and where relevant, the National Capital Authority (NCA)).

General comments

The Conservation Council continues to support the development of Canberra's Light Rail network. As the EIS states, it will be an essential part of wider efforts to reduce car dependence in Canberra, particularly in the context of the city's growth, and in so doing, reduce carbon emissions and vehicle-based pollution (plastics and heavy metals) with the associated improvements in air quality and public health.

We also wish to acknowledge the efforts of the ACT Government in its ongoing consultation processes, with which the Conservation Council has been closely involved. The resulting EIS is informative and thorough, and addresses the various issues we have raised.

Specific comments

Habitat destruction

The Conservation Council notes with concern that the project would involve the destruction of several habitat areas for threatened species.

Overall, the Conservation Council believes that the wider environmental benefits of the Light Rail Stage 2B detailed above are greater than the specific habitat destruction involved in the construction. However, it is essential that the impacts

are addressed and minimised as much as possible. We believe the Government can do so by:

1. Minimising destruction through careful design. We consider that careful design could significantly minimise destruction, particularly in relation to the preservation wherever possible of mature trees, as well as maximising plantings of native vegetation in the areas surrounding the tracks and stations. We believe further consideration should be given to avoiding direct impacts to threatened species and important habitat (e.g. mature trees).
2. Impacts to birds. Via the State Circle East and National Triangle - Barton alignment options, the Project is "likely" to result in the loss of a large number of trees, i.e.,:
    a. 126 or 116 mature native trees, including 19 or 15 hollow-bearing trees, respectively (Technical Paper 2, pp. 161, 189, 211)
    b. six or five suitable Gang-gang Cockatoo breeding trees, including three and two determined to be the highest priority for protection (Technical Paper 2, pp. 177-178 and Table 4.17)
    c. 5.64 ha or 5.06 ha of suitable foraging habitat for both Gang-gang Cockatoo and Superb Parrot (Technical Paper 2, pp. v-vi, 177, 179, 191-192, 212),

    Both Gang-gang Cockatoo and Superb Parrot are listed as threatened at both the Commonwealth and ACT levels. Whatever the route, if these impacts cannot be avoided, they are significant for the following reasons:

    d. Habitat critical to the survival of the Gang-gang Cockatoo includes all foraging habitat during both the breeding and non-breeding season. Habitat critical also includes hollow-bearing trees with known or potential gang-gang cockatoo hollow chambers. (Technical Paper 2, p. 191). It should be assumed all mature native trees to be lost have this potential.
    e. The Project area is an important flight corridor for the Superb Parrot in the ACT (Technical Paper 2, p. 192). The EIS makes very clear "60% of all hatchlings originate from just six breeding pairs from the Molonglo Valley nesting site. Tracking data provides evidence that these breeding pairs travel from the Molonglo Valley, through the Project area to foraging habitat in and adjacent to the Red Hill

Nature Reserve … multiple times per day (L. Rayner pers. comm. 2024)" (p. 192). The species requires vegetated corridors to move between breeding and foraging habitat; the degradation and destruction of movement corridors are key factors implicated in the species' decline (p. 192).

The proponent suggests the loss of trees in the population of Superb Parrot's flight corridor caused by the Project "may" interfere with the species' recovery and "may" result in a significant impact on the Superb Parrot (p. 192). We do not agree with this, and instead believe the project is likely to cause a residual significant impact by interfering with the species' recovery. We strongly encourage the proponent to do all possible to retain mature native trees and critical habitat to protect these species.

3. The effective use of offsets. We are very disappointed the ACT Government has elected to prepare a strategy for providing an offset *in the future* when it could have acted to deliver an offset in advance. Given it is almost certain this proposal will be approved, and given so much is known about the impacts of the preferred option, an advanced offset would have avoided a time lag in the delivery of the compensation and ensured the proposal will be permitted to commence on or soon after its approval.
At the same time, we support the use of an Offset Management Plan to mitigate and manage direct and indirect impacts on biodiversity. We believe that development and full adherence to a management plan is key to minimise impacts of the Light Rail construction and use, with heavy fines imposed if in breach. Again, careful design is essential to deliver timely, genuine offsets and avoid 'cosmetic' but ineffectual responses. On this matter, the Conservation Council notes the potential to work with Umwelt and the ACT Govt to collaboratively develop a suitable framework for evaluating future offset proposals for this project. In saying this, however:

    a. Despite what is written in the report, the Conservation Council argues that suitable offsets do occur in the ACT, directly adjacent to the areas to be destroyed. We urge that offsets be established in the ACT as close as possible to this area to provide or improve viable habitat and breeding options for the birds and for Golden Sun Moth. Full consideration should be given to protecting habitat *in perpetuity*

and restoring surrounding woodland and grassland, including on: National Land within the State Circle woodland and Gurubung Dhaura (Stirling Park Woodland), Guilfoyle St Grasslands and Yarramundi Grasslands; and Territory Land at Bullan Mura (adjacent to Gurubung Dhaura).

b. If these adjacent areas do not meet the criteria for the metrics other suitable sites in the ACT may be at other unleased land, for example, historical Travelling Stock Reserves at Hall, Paddys River, or Kowen.

c. The Conservation Council ACT and Region believe there are deficiencies in the Biodiversity Offset Strategy. Friends of Grasslands address these issues in detail in their submission, and we support their expert analysis.

4. Managing populations of Golden Sun Moth within the impacted area. We note that surveys have found low numbers of Golden Sun Moth in the recent surveys undertaken by Umwelt (2021-2023) for this project. However, the precautionary principle suggests that we absolutely should not rule out the potential of ongoing population in this area, and thorough investigation should be conducted to identify potential populations. If populations of Golden Sun Moth are found, the Government should implement translocation strategies with better management and ongoing monitoring practices than have been implemented in previous attempts. This will both be important for the survival of these populations, as well as offer important research opportunities for the species. There is also active GSM habitat in the open space between Black St and Alexandrina Drive in Yarralumla. This could be an ACT Government offset, to improve this habitat.

Preferred route

The Conservation Council supports the ACT Government's preferred routing around State Circle. Its location seems to offer a lower cost while also offering proximity to the large numbers of passengers travelling to Parliament House and the growing number of government agencies. This route is also faster, creating greater connectivity between Woden and the City.

Anticipated demand

In the Conservation Council view, the EIS is using projections of passenger numbers based on flawed data mainly extrapolated from the 2021 Australian Census (held during the COVID-19 lockdowns period), the 2022 ACT & Queanbeyan Household Travel Survey and Myway Plus data.

This approach is likely to underestimate demand, taking into account the recently revised ACT population projections issued by ACT Treasury, the known issues with My Way Plus implementation as well as the snapshot nature and limited scope of the Census data. The ACT & Queanbeyan Household Travel Survey provides some valuable insights but needs to be qualified due to its short data collection period and when it was conducted (October 2022, during the period recovering from the COVID-19 lockdowns). There is also significant planned and future development along the route, especially in the Parliamentary zone and North Curtin, and the project will service a rapidly growing and ageing population. Furthermore, light rail will make it more attractive to live along the corridor and experience with Stage 1 and in other Australian cities indicates that passenger numbers were under-estimated during planning of those light rail projects.

The Conservation Council suggests robust contemporary research would be prudent to underpin demand projections. A modest investment in expert advice would either confirm the current estimation methodology as being fit for purpose or provide an alternative methodology.

Design of stops

The Conservation Council notes that the stops in the Parliamentary triangle are proposed to have a length of 45 metres, whereas stops in other areas are proposed to be 33 metres long with provision for future extension to 45 metres in anticipation of growth in passenger numbers and a corresponding increase in the length of the vehicles. The Conservation Council recommends building all stations to be 45 metres long initially to accommodate the greater vehicle length and avoid the general experience that retrofitting infrastructure is invariably disruptive, more complex and more costly in the long run.

We also recommend that wherever possible, stations are designed to allow access from both ends, without creating the need to cross the road as is the case for some stations on the northern light rail route. The design in the northern route often results in people crossing the road illegally and dangerously and is a

passive barrier to usage. Allowing people to access stops from both ends will stop this practice.

To maximise success of the project and avoid passive barriers to using the light rail, stations and access to them need to be attractive and comfortable for everyone regardless of age, ability or gender.

Stations also need facilities to assist parents travelling with young children, people with disability and older members of the community. The stations and access to them from surrounding catchments must comply with all applicable anti-discrimination laws and accessibility standards. This includes the ACT's Discrimination Act 1991 and Human Rights Act 2004 as well as the Commonwealth's *Disability Discrimination Act 1992* and *Age Discrimination Act 2004*. It would help potential users to have confidence about accessibility for this compliance to be independently verified.

Integrated transport infrastructure

To realise the potential for the light rail it is essential to ensure it is effectively integrated with other transport modes.

For planned stops such as Carruthers Street and Kent Street, the distance between the station and destinations such as shops, schools and medical facilities is considerable, with pedestrian and bicycle paths currently being inadequate.

To support a mode shift from driving to light rail, these connections need to be safe, accessible, attractive and convenient for all types of pedestrians and cyclists. Consideration should therefore be given to ensuring that bike and walking paths and crossings are upgraded in the approaches key areas to ensure safe, convenient, accessible and comfortable access to light rail stops.

This includes ensuring proper separation from vehicle traffic, good lighting and secure bike parking at the station. An often overlooked additional aspect of this is including shelter (structural or trees) from the wind, sun, rain and noise which can make the final few hundred metres of travel to the stop unpleasant and daunting, particularly given the high and exposed location.

The design should also include simple measures such as adding bike rails to stairs to enable bikes to be easily wheeled up and down.

Within the stops, we also recommend that the lifts are large enough to allow side–by-side strollers, mobility scooters and cargo bikes, which are rapidly becoming a valuable option for cyclists due to their greater cargo-carrying capacity. The Conservation Council suggests adopting the general rule that any wheeled vehicle that fits on a Light Rail car should fit in the lifts servicing a stop. The alternative creates the risk of arriving passengers being stranded at station level and potential passengers being stranded at street/path level.

The footprint allowed for scooters and mobility devices should also meet and strive to exceed the requirements within the Australian Standards. Designers should work with disabled peoples organisations and accredited access consultants who are in touch with trends in scooter design to ensure that the design of the vehicles represents best practice and draws on lived experience.

Finally, close attention is needed to ensure the integration of light rail into bus routes and scheduling. Of particular importance is the connection between the Kent Street station and buses to properly service the large and growing Deakin health precinct.

Several points must be emphasised:

- Some of the people who will most benefit from the light rail are those with limited mobility including children and young people, older people and people living with disabilities. These same groups are exactly those who are most affected by poor infrastructure such as narrow and rough surfaces on footpaths and steep gradients.
- The need for these connections to be ‘attractive’ and ‘convenient’ should not be seen as a luxury or ‘nice to have’: mode shift to the light rail depends on the whole experience being more convenient than the default option in a private car as well as feeling safe and attractive. The environment for accessing stops at Carruthers Street, Kent/Novar Streets and Hopetoun Circuit in particular is very exposed and hostile for people not inside vehicles. Passive barriers to use can be addressed by good design at a cost that is minor as a proportion of the overall project, but unaddressed, can have a disproportionate adverse effect on usage.

Woden

The Conservation Council supports the proposed location and design of the North Woden (Philip Oval) stop, noting that it integrates well into the growing housing developments and apartments in the vicinity, supporting commuters and people going to the Philip Oval/CIT/bus interchange.

However, consistent with comments above regarding the importance of effective integration of transport modes, we note that improvements could be made to the connections to the rest of Woden town centre. For example, the Woden Library is around 450-500 metres away with a somewhat unfriendly pedestrian environment (including gradient, poor lighting, lifts/stairs and/or a busy shopping mall), raising many accessibility issues for some passengers, as well as reduced convenience to others that may create a passive barrier to use. We note that accessing Woden Library from the transport interchange is a common theme arising in the consultations attended by our representatives.

The Conservation Council considers that this could be rectified by ensuring integration of the Light Rail station with East/West transport options, including regular buses servicing the Corinna St commercial/health provider strip (which would be free for passengers transferring from light rail). This would ensure viable and convenient connections, without the need to consider moving or modifying the stop itself.

The Conservation Council also considers that the stop for Curtin North/Mint should be built at the same time as the other stations. This is because the Light Rail Stage 2B and North Curtin Residential Area development will occur within similar timeframes and access to light rail must be available for all residences and destinations along the route. For clarity, the proposed light rail stops at Kent Street and Carruthers Street are too far apart to provide effective service to current residences in northeast Curtin and to those in the new estate.

Conclusion

The Conservation Council regards the development of light rail to Woden as being integral to the ACT Government meeting its commitments to reduce Greenhouse gas emissions and will also reduce other particulate emissions once implemented. Careful design and sensible construction should minimise destruction of trees and habitat, and combined with a sound offset strategy should lead to good environmental outcomes. The Conservation Council's

modest suggestions will serve to enhance the project’s success over the long term.