

Griffith/Narrabundah Community Association Inc.

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Dear Sirs

COMMENTS ON DV327 – CAPITAL METRO LIGHT RAIL STAGE 1 GUNG AHLIN TO CIVIC

The Griffith Narrabundah Community Association (GNCA) opposes the proposed Draft Variation 327 to the Territory Plan. This is because the GNCA believes the changes to land zoning provisions as proposed are premature at this stage, in the absence of any published rigorous cost benefit of the proposed construction of a Gungahlin/Civic light rail in Canberra, nor any published analysis of the likely passenger loads on the route apparently already selected.

The GNCA is not necessarily opposed to further Government investment in public transport, and consequently does not have any formal position on the desirability of a Light Rail system for Canberra. Were such a system to be shown to be the best solution to Canberra's transport problems, and achievable at reasonable cost, the GNCA would support such an initiative.

However, before the GNCA could begin to consider such a proposal we would expect to see a rigorous cost benefit analysis of the proposed light rail system, which also fully explored the costs and benefits of alternative solutions, including those involving further investment in other transport modes or other proposed routes.

The GNCA is strongly opposed to particular modes of public transport being selected for Government support on political grounds. In the absence of published studies demonstrating the superiority of light rail over alternative transport solutions, the GNCA feels that political calculations are the driver behind the currently proposed Gungahlin/Civic light rail project. This does not bode well for the future of the proposal.

Similarly the GNCA is also strongly opposed to the routes for any new mode of public transport being determined on political grounds. Again, in the absence of any published figures on expected passenger loads, and a demonstration that the proposed route would be the most beneficial to the ACT as a whole (rather than to property owners or residents of Gungahlin), the GNCA is reluctantly pushed towards the view that political considerations are the principal driver of the selected route.

Of course it is the Government's prerogative to provide non-economic services to specific areas if it so wishes. However, if this were the case the appropriate way to deliver such a service would be to provide in the budget for an annual payment to the public transport provider to supply this service. This would ensure that the community could easily identify the amount of transport subsidy being provided to any such areas.

We understand that the Greens support the introduction of light rail based public transport because it is more "sustainable", presumably because it uses electricity rather than petroleum based fuel. Any cost benefit analysis should include such sustainability considerations, and explore issues such as:

- How are sustainability considerations best measured, and how can they be fairly traded off against economic issues?
- Are light rail vehicles which draw their power from reticulated electricity, mainly generated by coal or gas fired generators, more "sustainable" than an equivalent sized vehicle powered by petroleum derived fossil fuel (ie diesel, petrol or LPG (liquefied petroleum gas))?
- How would the results be altered by the conversion of any of the vehicles under consideration to battery electric operation, or some hybrid power train?
- Or a switch in fuel from fossil fuel generated electricity to renewably generated electricity?
- Or a switch from fossil fuels to bio-diesel, bio-ethanol, or methanol (either biologically generated or manufactured using renewable energy)?
- Is technological progress in any relevant field advancing at such a rate that the answers to any of these questions are likely to be different from those given today in ten years time?

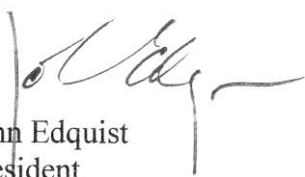
Although it would no doubt be thoroughly covered in any proper cost benefit analysis of the light rail proposal, the GNCA also believes that the Government could with benefit give some thought to reviewing ACTION's current operations and routes. Without in any way wishing to restrict the scope of such a review, it might usefully touch on:

- what does ACTION consider its target market to be, and whether this might need adjustment;
- what would be the costs and benefits of privatising ACTION and paying a subsidy for provision of public transport services, as is done for example in Victoria;
- would changes to the mix of vehicles and technology improve ACTION's operations (small feeder buses, dynamic bus routing using smart phone capabilities, driverless buses);
- likely impact on public transport of the introduction of traffic congestion pricing; and
- likely impact on ACTION of a significant relaxation of current taxi regulation (or how does the Government propose to respond to the inevitable growth of services like Uber, made possibly by widespread smart phone availability).

Consequently the GNCA believes that there are a number of important issues that need to be addressed before the Government commits the Territory to a long term and large investment in light rail. At a time like the present, when technological progress is changing old certainties, and making new transport models feasible, a fully considered approach to further public spending on public transport would appear to be more fruitful than some doctrinaire adherence to an outdated approach.

The GNCA would be happy to discuss these issues further with the Government.

Yours sincerely



John Edquist
President

12 October 2014