



NATIONAL TRUST

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PATRON: The Hon Margaret Reid AO

Referrals Gateway  
Assessment and Governance Branch  
Department of the Environment and Energy

[epbc.comments@environment.gov.au](mailto:epbc.comments@environment.gov.au)

**Referral #4301**  
**Commonwealth Park to Woden Light Rail Project, ACT**

**ACTNT**

The National Trust of Australia (ACT) (ACTNT) is a non-government, non-profit, community organisation incorporated as a public company under the Australian Corporations Law. Membership is open to any individual, family business or organisation. We currently have around 1,700 members in the ACT and surrounding region.

The purpose of the ACTNT, as expressed in our Strategic Plan 2019-2023 is 'To promote the conservation of, and foster public knowledge about, places, objects and issues that are significant to the heritage of the Australian Capital Territory.'

**EPBC status**

The ACTNT considers that this component of Stage 2 of the Light Rail initiative, which is dealt with in this referral, is a 'controlled action' under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act). It should therefore be assessed under the EPBC Act.

It supports the recommendation to this effect in the referral by Major Projects Canberra (MPC) on the basis of the likely significant impact relating to the values of:

- the critically endangered golden sun moth;
- heritage listed matters;
- National heritage listed places;
- Commonwealth heritage listed and nominated places, and,
- on Commonwealth land values.

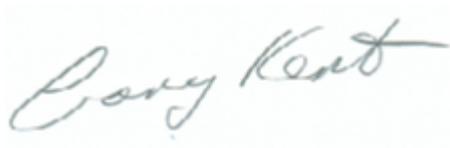
### Assessment process

Given the very significant heritage and other values likely to be affected by this project, and the high level of public interest, it is important that this project be assessed in a transparent manner and at arm's length from the project proponent.

For this reason, the ACTNT asks that the assessment take the form of an independent public inquiry established by the Commonwealth Minister under Part 8, Division 7, of the EPBC Act, with all the protections and procedural guarantees provided for therein. We do not support the recommendation of MPC that the assessment take the form of an Environmental Impact Assessment (EIA).

In our view, an EIA would not provide the same opportunities for community and stakeholder engagement and public airing of the key issues, about which there will likely be many diverse and strongly-held views.

Yours faithfully

A handwritten signature in cursive script that reads "Gary Kent". The signature is written in dark ink on a light-colored background.

Gary Kent  
President  
National Trust (ACT)  
29 July 2019