



NATIONAL TRUST

Unit 2.03, Level 2, Griffin Centre
20 Genge Street, Canberra ACT 2600

PO BOX 1144
CIVIC SQUARE ACT 2608

EMAIL: info@nationaltrustact.org.au
WEB: www.nationaltrustact.org.au

T: 02 6230 0533

PATRON: The Hon Margaret Reid AO

23 December 2019

Referrals Gateway
Department of Environment & Energy
GPO Box 787
CANBERRA ACT 2601

epbc.comments@environment.gov.au

Dear Sir or Madam

CANBERRA LIGHT RAIL STAGE 2A

EPBE Reference 2019/8582

1: INTRODUCTION

The National Trust does not support the LR2A as the real impact on heritage values along the route have not been adequately detailed to enable a correct and informed decision to be made.

2: OVERVIEW

There are numerous references to *“more detailed assessment would be needed. (SECTION 2) comment on impact and the heritage assessment being proposed to support the planning approvals”* (page 49) and *“a heritage assessment is currently being prepared”* (page 69) and this appears to indicate a decision has been made and the research and justification will be twisted to support it rather than research and analysis first and then design within the constraints.

3: RESERVE BANK BUILDING

There is a reasonable amount of discussion and detail of the RBA. It is a pity that the most recent HMP is not referenced, the real impact on vibration (it will be *“impacted by cosmetic building damage”* (page 69), is totally inadequate and dismissive. There will be visual impacts which are not explored or detailed.

4: GOLDEN SUN MOTH

It is acknowledged and detailed that it exist, is a critically endangered species and *“any habitual loss considered significant under the EPBC Act (P8)”*. However the proposals ignore retention and states *it is impossible to avoid an impact* (Section 2). The report is dismissive with an apparent outcome that it has to go to be destroyed. No LR2 will protect it. The comment that the 2019 site investigation discovered less than 2017 is not suprising when the scope of the 2019 study was narrowly focused (section 3)

5: PARLIAMENT HOUSE VISTA

This is mentioned extensively and acknowledged that it will have an impact on it despite the lack of wires but the detail is not provided or explored. There will be infrastructure such as traction power station and station building which will have an impact but these are not detailed. A dismissive statement is made such as that it could be seen (page 11) and the design will minimise its visual prominence.

The comment that landscape planting and urban design would be used to supplement and reinforce the existing amenities character is without justification or detail.

6: CITY HILL

The impact on city hill is not addressed or adequately considered

7: OTHER HERITAGE PLACES:

There are several listed but no analysis or detail on the impact especially vibration and setting. This includes:

- Sydney and Melbourne Buildings
- Former ANZ Bank Building
- Supreme Court and ACT Law Court
- National Film and Sound Archive
- Archbishops House
- Canberra Olympic Pool
- Shine Dome (Australian Academy of Science)
- Civic Square

8: HERITAGE PLACES NOT MENTIONED

Although many places were mentioned some closer ones have not been, these include

- Beauchams House
- Former Hotel Acton
- Commonwealth Park

9: OTHER IMPACTS

The raising of London Circuit to Commonwealth Avenue will have a major impact and there are no illustrations to inform the detail of the impact.

There is currently both left and right hand turning into a number of street, car parks and the like off London Circuit. The impact on these has not been mentioned.

The slower traffic and travel times will increase pollution and makes Canberra less sustainable. In times of heavy pollution such as December 2019 this cannot be tolerated.

CONCLUSION

It is too early to even consider the referral. More work and detailed assessment is essential if all impacts can be considered and an adequate assessment made.

Yours faithfully

A handwritten signature in black ink, appearing to read 'E J Martin', written in a cursive style.

Eric J Martin, AM