

Red Hill Nature Reserve and Surrounds

30.12.2019

To: Terrplan@act.gov.au

Dear Sir/madam,

Comments for the Red Hill Nature Reserve and Surrounds are made below. These are made on behalf of the ACT National Trust.

We are particularly interested in protecting all aspects for the heritage values of the area and while some steps have been taken to achieve this we do not believe all aspects have been covered and need to be before the final integrated plan should be accepted.

1. The final management plan will need to be related to the final proposal and the proposal to have one is strongly supported. Can you advise when the comments on this close and where copies are available from. We hope that the historic plantings have been identified and are protected.
2. We strongly support the measures to protect ecological values but suggest that this should be extended to cover all heritage values (not mentioned in executive summary) although included in the guiding principles. We note that potential impacts will be considered with all proposals and hope that impact reports will be provided for all work and that they are made readily available to all.
3. We note that the National Trust was not one of the Organisations consulted despite a strong community interest on all heritage values
4. Section 4.3 refers to a list of heritage places in the study area but fails to list many of the places in Deakin which are on the ACT Heritage Register even though the impact is likely to be small.
5. Reference is made in section 4.3 about the possibility of aboriginal heritage in undisturbed sites but it is unclear if any of the potential areas for change are undisturbed areas that required a investigation before the plan is adopted.
6. The comment in section 4.3 re Red Hill Nature Reserve that there may be 'no other reasonably practical ways of undertaking those works' may result in acceptable damage to a heritage site. Surely the heritage issues should be identified now and that the plan developed so it does not compromise heritage values rather than adopt a plan before adequate research is done and then have to destroy heritage values.
7. Deakin section 66. The note is made that there are no registered heritage sites but the question is have all the required studies been undertaken to confirm the section has no heritage values. There is insufficient evidence of this and the fact that the past has meant no studies and therefore no nominations should not be interpreted as saying that there are none within the section. Also the comment that the Heritage Council states that heritage sites are unlikely is not confirmation that there are none. Reference is made to cultural heritage assessment but has there been flora and fauna studies?
8. A similar comment to those made in point 7 above can be made about the Federal Gold Course. While the surface may have been disturbed while construction of the course when it comes to more intense building and construction works which involve site regrading and trenching then previously undisturbed area may be affected and these may contain aboriginal artefacts.
9. The comment that the draft integrated plan will restrict development that may diminish the significance of registered places is not sufficient. It should say it will not diminish the significance of heritage places and then undertake the studies in advance to confirm the heritage places and the plan to not affect the heritage. Noting the areas where unrecorded Aboriginal places and objects may occur is not sufficient. It is a start to a process so initiate a

study to confirm if there are heritage sites and the act to protect any rather than proceeding without the study.

10. Ecological values comment states protecting essential ecological in the longer term is not clear as to who decides what is essential and what is considered to be the longer term? The studies need to be done now, determine and agree the values and then protect them. There is mention that there are areas that exhibit potential high ecological values. These need to be all carefully defined and protected but the map is not clear about this.

It has taken some time to come to this proposal and for the sake of a few more studies to confirm all heritage issues and then set in place a plan that protects them should be undertaken before any final plan is adopted.

Regards,

Eric Martin, AM