



# Light Rail, City to Commonwealth Park

Heritage Impact Assessment

Final Report

Prepared for ACT Government,  
Major Projects Canberra  
December 2022



## **Acknowledgement of Country**

We respect and acknowledge the First Nations of the lands and waterways on which we live and work, their rich cultural heritage and their deep connection to Country, and we acknowledge their Elders past and present. We are committed to truth-telling and to engaging with First Nations to support the protection of their culture and heritage. We strongly advocate social, cultural and political justice and support the Uluru Statement from the Heart.

# Report register

The following report register documents the development of this report, in accordance with GML’s Quality Management System.

Job No.	Issue No.	Notes/Description	Issue Date
18-0678C	1	Draft Report	29 April 2022
18-0678C	2	Final Report	25 November 2022
18-0678C	3	Revised Final Report	2 December 2022
18-0678C	4	Updated Final Report	6 December 2022
18-0678C	5	Revised with updated project description	15 December 2022

## Quality management

The report has been reviewed and approved for issue in accordance with the GML quality management policy and procedures.

It aligns with best-practice heritage conservation and management, *The Burra Charter: the Australia ICOMOS Charter for Places of Cultural Significance, 2013* and heritage and environmental legislation and guidelines relevant to the subject place.

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## Executive summary

This report has been prepared to further inform the design development and the Territory and Commonwealth approvals for Light Rail Stage 2A project, City to Commonwealth Park (referred to as 'the Project').

GML Heritage Pty Ltd (GML) has been engaged by ACT Government/Major Projects Canberra (MPC) to prepare a Heritage Impact Assessment (HIA) for the Project—the construction and operation of dual-track light rail from the existing Gungahlin to City light rail terminus, around London Circuit (west) and along Commonwealth Avenue to a terminus at Commonwealth Park.

This HIA provides a high-level heritage impact analysis of the Project on the known heritage values located within or adjacent to the study area. The focus of this HIA is on the historic heritage values located along the route. However, for the purposes of due diligence, potential natural and Indigenous heritage values have been reviewed and discussed.

## Key Findings

The impact assessment in Section 5 determines the following key findings.

- There are three categories of works that have been assessed in relation to their potential impact on heritage places in the study area (comprising National, Commonwealth and ACT Heritage listed/nominated places and their values). These works, the place and the level of impact include:
  - **Construction works** are likely to have 'minor' visual impacts on most heritage places in the study area located along the route.
  - **Operational works** to existing infrastructure—specifically new tracks, light rail stops, intersection works, light rail bridge and removal of public domain trees—are likely to have a 'moderate' impact on the heritage values of 'Canberra the Planned National Capital' and Commonwealth Avenue (part of National Land Roads).
  - **Operation of the light rail** is unlikely to cause impact to the heritage values of the places along the route.
- Individual heritage places that would be impacted by works are as follows:
  - Proposed light rail stops, and other vertical infrastructure along Commonwealth Avenue, are likely to have a minor impact on Lake Burley

Griffin (Commonwealth Heritage place), the Parliament House Vista (Commonwealth Heritage place), and City Hill (ACT Heritage place).

- Verge works, including the removal of the original threshold step and planting of new trees, are likely to have a moderate impact on the Sydney and Melbourne Buildings (ACT Heritage place).
- Removal of the existing western verge/footpath and installation of new paving is likely to have a minor impact on the Law Courts Precinct (ACT Heritage place).

Heritage advice to assist in avoiding and mitigating identified heritage impacts is provided in Section 6 to inform the next stage of design development and project planning. Generally, the recommendations include:

- Further design development of infrastructure that aims to reduce visual impacts and clutter in the significant urban/cultural landscape setting, as far as possible.
- Consider the design of the proposed new bridge over Parkes Way, to ensure it is designed holistically with the light rail track and passage over Commonwealth Avenue Bridge.
- Ensure complementary materials are selected for new verge work paving.
- Undertake a photographic archival record of the study area from the existing terminus to Commonwealth Avenue Park prior to works commencing.

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# 1 Introduction

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# 1 Introduction

## 1.1 Background and Purpose

GML Heritage Pty Ltd (GML) has been engaged by the ACT Government/Major Projects Canberra (MPC) to prepare a Heritage Impact Assessment (HIA) for the Light Rail Stage 2A project, City to Commonwealth Park (referred to as 'the Project').

This report supports the Environmental Assessment being prepared by AECOM Australia Pty Ltd (AECOM) and will be included in the National Capital Authority (NCA) Works Approval and ACT Government Development Application (DA) submissions for the Project.

This HIA provides a high-level heritage impact analysis of the Project on the known heritage values of the study area and the adjacent area. The HIA focuses on the historic heritage values along the route. However, to ensure due diligence, potential natural and Indigenous heritage values have also been reviewed and discussed.

The report includes a risk matrix assessment to ensure consistency with the other environmental assessment technical reports.

### 1.1.1 Project Context

In 2019, a referral (EPBC 2019/8582) under the *Commonwealth Environment Protection and Biodiversity Conservation Act 1999* (the EPBC Act) was submitted for the City to Commonwealth Park Light Rail Project. According to the notification of Referral Decision for the 'City to Commonwealth Park via London Circuit and Commonwealth Avenue' dated 2 February 2021, the Department of Agriculture, Water and the Environment determined that the Project is to be a 'controlled action' and assessed through Preliminary Documentation. MPC received a Conditional Approval from the Department on 2 February 2021. Heritage has not been determined as a controlling provision for preliminary documentation.

## 1.2 Study Area

The Project would expand the current light rail by approximately 1.7 kilometres and involves the construction and operation of a light rail service between the current Alinga Street terminus and Commonwealth Park.

The proposed route starts at the existing Gungahlin to City light rail terminus and extends down the median of Northbourne Avenue, around London Circuit (west), and along Commonwealth Avenue to a terminus at Commonwealth Park.

The study area, which matches the Delivery Phase Area determined by MPC, is shown in Figure 1.1 with the proposed route alignment and new light rail stops.

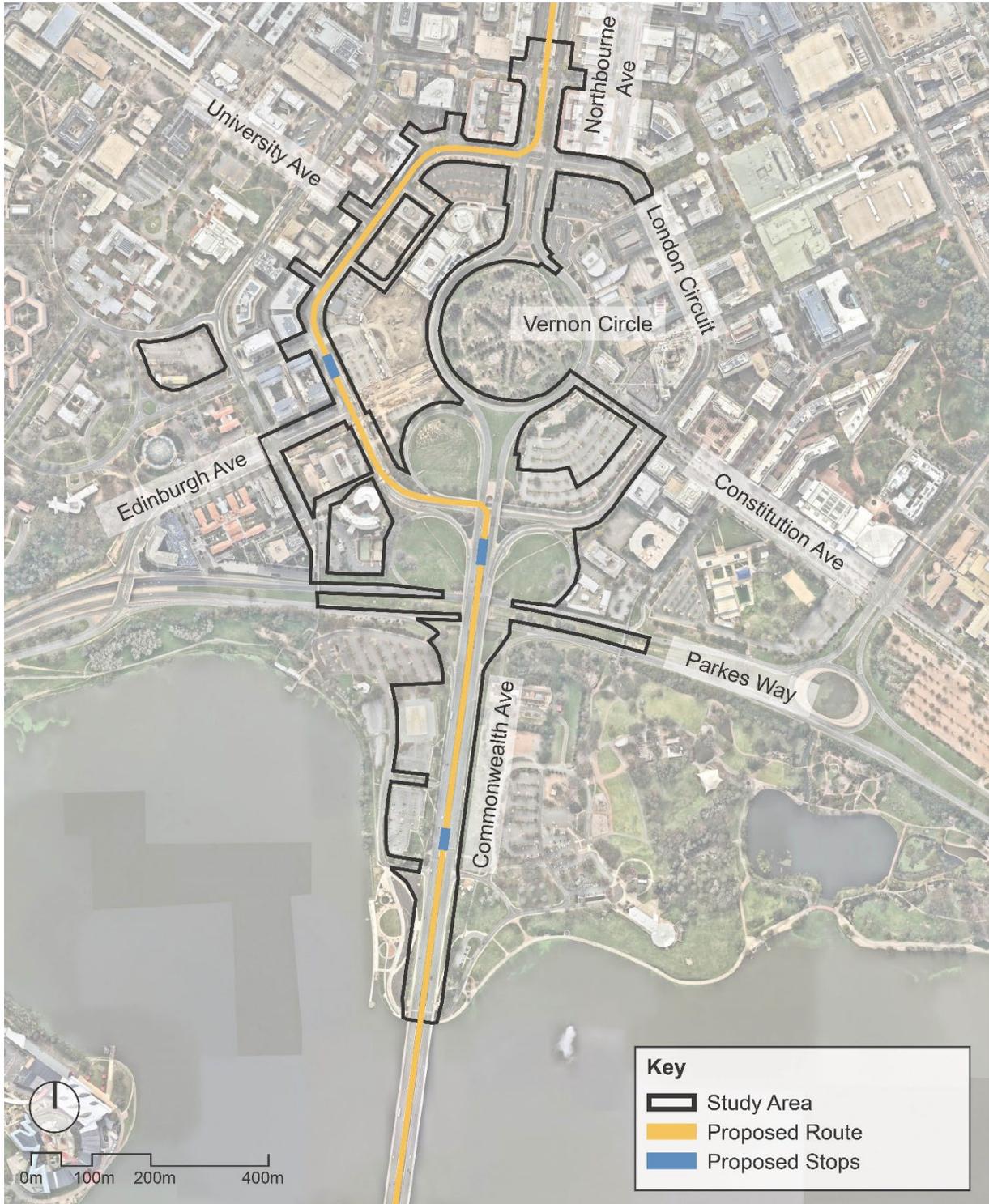


Figure 1.1 The study area, alignment of the proposed route and light rail stops. (Source: GML 2020)

## 1.3 Methodology

This HIA has been prepared to meet the client brief. It provides:

- an overview of the statutory heritage context relevant to the Project;
- identification of known and recorded historic, Indigenous and natural heritage values and places within or adjacent to the study area;
- reference to relevant heritage management documents/guidelines, including Conservation Management Plans (CMPs) and Heritage Management Plans (HMPs);
- assessment of the Project for potential heritage impacts on the identified heritage values with reference to the EPBC Act and its guidelines; and
- recommended mitigation measures to inform the design development and to help reduce or avoid any identified impacts.

This HIA also fulfils the requirements of a Statement of Heritage Effect (SHE) under the ACT *Heritage Act 2004*, Section 61G 'Application for approval of Statement of Heritage Effect'. In accordance with the Act, this report sets out:

- details about the proposed activity (refer to Section 3);
- details of alternative options of carrying out the proposed activity or proposal which were investigated and why they were discounted (refer to Section 3.2);
- the description of the heritage site (refer to Section 4);
- the likely effect of the proposed activity or proposal on the heritage site (refer to Section 5); and
- mitigation measures that will be adopted (refer to Section 6).

A site visit was undertaken to understand the context of the area, including the heritage places in or adjacent to the study area.

### 1.3.1 Consultation

To assess the Indigenous heritage values of the route, consultation was undertaken with the four recognised Representative Aboriginal Organisations (RAOs) in the ACT. This afforded them an opportunity to participate in the assessment and management of their cultural heritage and was undertaken as part of the September 2020 HIA.

Because land in the ACT could be subject to both ACT and Commonwealth heritage legislation, Aboriginal community consultation is generally undertaken with reference to both regulatory systems. Consultation for the Project was undertaken in line with *Ask First: A guide to respecting Indigenous heritage places and values*, prepared by the Australian Heritage Commission in 2002.

These guidelines generally require the identification of the relevant Traditional Owners and any other Aboriginal people with rights and interests in the area. This involves contacting land councils, local councils, state authorities (such as ACT Heritage) and any other known group or authority that may be able to provide the relevant information.

While the Ask First guidelines do not require a specifically prescriptive process, the identification of the relevant Aboriginal community representative groups for the ACT has been addressed through the formal recognition of four RAOs. The four groups were recognised through a Ministerial declaration in 2006 under S14 (8) of the Heritage Act.

The four RAOs for the ACT are:

- Buru Ngunawal Aboriginal Corporation;
- King Brown Tribal Group (formerly known as the Consultative Body Aboriginal Corporation on Indigenous Land and Artefacts in the Ngunnawal Area);
- Mirabee (formerly Little Gudgenby River Tribal Council); and
- Ngarigu Currawong Clan.

Further information about the consultation with the RAOs is provided in Section 4.4.

MPC completed a survey for the Project which asked respondents to, *'Please provide detail of the heritage values you believe should be further considered'*. The following results were gathered:

Heritage Value identified by Survey Respondents	Count
Archbishop's Residence	1
Griffin's Plan	6
Consultation	2
Design Suggestion	4
Views across the lake	1
Indigenous Consultation	9
The old bridge	1
Scott's crossing	1
City Hill	3
Heritage trees and plantings	3
Views of the City	1
Views to the Brindabellas	1
History of the area generally	1
Melbourne and Sydney Buildings	2

Heritage Value identified by Survey Respondents	Count
N/A	15

Some example responses include:

- “There should be signage at or near the intersection of London Circuit and Commonwealth Avenue showing images of the "clover leaf" prior to raising of London Circuit and of the immediate area prior to the Commonwealth Avenue Bridge construction.”
- “Sydney and Melbourne Buildings should be recognised as key heritage features.”
- “Station names, and perhaps some design elements of the station furniture to include some heritage aspects.”
- “Established trees and plantings.”
- “Good opportunity to consider / include local Aboriginal place names / history.”
- “A way to integrate the Indigenous heritage value of spirituality and knowledge would be preferable. The design should also respect the national capital planning intentions and spirit.”
- “Light rail stops could point out surrounding local areas of historical/heritage interest.”
- “Care should be taken to ensure the integrity of City Hill and the axis to the lake.”
- “The Griffin plan, the fact that Indigenous sites would have been lost when the lake was created.”
- “Albert Hall, Commonwealth Bridge, City Hill, City Walk.”

## 1.4 Limitations

This HIA relies on existing listing information and does not contain any new assessments of historic heritage values against the Commonwealth Heritage criteria for places on Commonwealth land or for ACT Heritage places on ACT land located along the proposed route.

Relevant HMPs and CMPs have been reviewed in the preparation of this HIA, but only those which are publicly accessible have been referenced. No heritage management documents or guidelines have been prepared previously for Canberra the Planned National Capital, National Land Roads, Law Courts Precinct, or Ian Potter House. The 2005 CMP for Hotel Acton could not be accessed.

Aboriginal community consultation undertaken for this report was based on the practice in the ACT of contacting the four recognised RAOs for the purposes of undertaking heritage-based assessments. Every reasonable attempt was made to ensure that each RAO had the opportunity to engage with the Project at this early stage.

## **1.5 Relevant Documentation/References**

### **1.5.1 Project/Design Documentation**

In preparing this HIA, GML has examined the proposal which includes works as described and shown in the following documents:

- AECOM, Canberra Light Rail 2A General, Amendment A, Draft PSP Issue, 02.22; and
- AECOM, Light Rail Stage 2 Preliminary Environmental Risk Assessment, dated 23 February 2022.

### **1.5.2 Key References**

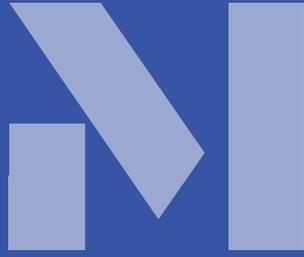
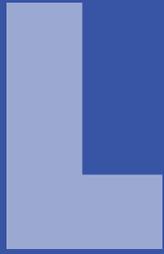
This HIA has been informed by the following documents:

- Biosis — City to Commonwealth Park Preliminary Environmental Assessment: Biodiversity, prepared for Major Projects Canberra, 3 July 2019;
- RPS — Canberra Light Rail Stage 2 Environmental Aboriginal Heritage Study, prepared for Transport Canberra and City Services, 2017;
- Australian Government/Department of the Environment — Draft Canberra the Planned National Capital: National Heritage Place: EPBC Act Referral Guidelines, 2012;
- Australian Heritage Database, Commonwealth Heritage List: Parliament House Vista (Place ID 105466);
- Duncan Marshall et al — Parliament House Vista Area Heritage Management Plan, prepared for the National Capital Authority, 2010;
- Australian Heritage Database, National Heritage List: Australian Academy of Science Building (Place ID 105741);
- Eric Martin and Associates — Shine Dome Heritage Management Plan, prepared for the Australian Academy of Science, 2018;
- Australian Heritage Database, Commonwealth Heritage List: Reserve Bank of Australia (Place ID 105396);
- Eric Martin and Associates — Reserve Bank of Australia (Canberra Branch) Heritage Management Plan, prepared for the Reserve Bank of Australia, 2019;

- Australian Heritage Database, Commonwealth Heritage List (nominated): National Land Roads (Place ID 106324);
- Duncan Marshall et al – Commonwealth Heritage Assessment for Certain Roads of National Land in Central Canberra, prepared for the National Capital Authority, 2014;
- Australian Heritage Database, Commonwealth Heritage List (nominated): Lake Burley Griffin and Adjacent Lands (Place ID 105230); National Heritage List (nominated): Lake Burley Griffin and Lakeshore Landscape (Place ID 106287);
- Godden Mackay Logan (now GML Heritage) – Lake Burley Griffin and Adjacent Lands Heritage Management Plan, prepared for National Capital Authority, 2008;
- Godden Mackay Logan (now GML Heritage) – Lake Burley Griffin Heritage Assessment, prepared for the National Capital Authority, 2010;
- ACT Heritage Council – Entry to ACT Heritage Register: City Hill;
- ACT Heritage Council – Entry to ACT Heritage Register: Melbourne and Sydney Buildings;
- Philip Leeson Architects – *Sydney and Melbourne Buildings Conservation Management Plan*, prepared for the ACT Government, 2022;
- ACT Heritage Council – Entry to ACT Heritage Register: ANZ Bank Building (former ES&A Bank);
- Eric Martin and Associates – *Former ANZ Bank Building Conservation Management Plan*, prepared for Simtak Pty Ltd, 2006;
- ACT Heritage Council – ACT Heritage Register (Provisional Registration): The Civic Square Precinct;
- Peter Freeman Pty Ltd – *The Civic Square Precinct Conservation Management Plan*, prepared for ACT Procurement Solutions, 2009;
- ACT Heritage – Nomination to the ACT Heritage Register: Law Courts Precinct;
- ACT Heritage Council – Entry to ACT Heritage Register: Hotel Acton;
- ACT Heritage Council – Entry to ACT Heritage Register: Ian Potter House (Beauchamp House);
- National Capital Authority – *National Capital Plan*, September 2019;
- Australian Heritage Commission, *Australian Natural Heritage Charter for the conservation of places of natural heritage significance*, 2002;
- Australia ICOMOS – *The Burra Charter: The Australia ICOMOS Charter for Places of Cultural Significance*, 2013;
- Department of Sustainability, Environment, Water, Population and Communities 2013 – *Actions on, or impacting upon, Commonwealth land, and actions by Commonwealth agencies, Significant Impact Guidelines 1.2, Commonwealth of Australia* (Significant Impact Guidelines 1.2); and

- Department of the Environment 2013 — Significant Impact Guidelines 1.1 for Matters of National Environmental Significance, Commonwealth of Australia.

## 2 Statutory Heritage Context



## 2 Statutory Heritage Context

### 2.1 Introduction

Heritage places and objects in the ACT are protected under Territory or Commonwealth legislation, or both. This section provides an overview of the Territory and Commonwealth legislation relevant to the Project.

### 2.2 Planning and Development Act 2007 (ACT)

The *Planning and Development Act 2007* provides a planning and land development framework for the ACT. It stipulates and regulates the functions of the Planning and Land Authority in the Environment, Planning and Sustainable Development Directorate—Planning (EPSDD).

The Planning and Land Authority is the primary authority for planning and development in the ACT, with statutory roles performed under the *Planning and Development Act 2007* and the *Territory Plan 2008* (the Territory Plan). The Planning and Land Authority advises the ACT Government on land, planning and building policy. For listed heritage places and objects in the ACT, which may be impacted by planning developments, the Planning and Land Authority seeks advice from the ACT Heritage Council under the provisions of the *ACT Heritage Act*. It also gives development approval.

As part of the study area is located on Territory Land, a Development Application for proposed new works is required to be submitted and approved under the *Planning and Development Act 2007*.

### 2.3 Australian Capital Territory (Planning and Land Management) Act 1988 (Cth)

#### 2.3.1 National Capital Plan (Cth)

The *Australian Capital Territory (Planning and Land Management) Act 1988* (PALM Act) establishes the requirements for the National Capital Plan (NCP) and its administration by the National Capital Authority (NCA).

The aim of the NCP is to ensure that 'Canberra and the Territory are planned and developed in accordance with their national significance'. It is important to note that the terminology 'national significance' in the NCP has a different statutory meaning to

'National Heritage value', or significance as defined by the Environment Protection and Biodiversity and Conservation Act 1999 (EPBC Act)—discussed in Section 2.4. The NCP definition of 'key matters of national significance' specific to Canberra includes:

- The pre-eminence of the role of Canberra and the Territory as the centre of National Capital functions, and as the symbol of Australian national life and values.
- Conservation and enhancement of the landscape features which give the National Capital its character and setting, and which contribute to the integration of natural and urban environments.
- Respect for the key elements of the Griffins' formally adopted plan for Canberra.
- Creation, conservation and enhancement of fitting sites, approaches and backdrops for national institutions and ceremonies as well as National Capital uses.
- The development of a city which both respects environmental values and reflects national concerns with the sustainability of Australia's urban areas.<sup>1</sup>

## Designated Areas

The NCP specifies areas of land that have 'special characteristics of the National Capital' to be Designated Areas. These areas can be located on Commonwealth/National Land or Territory Land. The NCA has responsibility for determining detailed planning policy and the provision of Works Approval to ensure development is consistent with the NCP.<sup>2</sup> Designated Areas are divided into a series of precincts with detailed conditions of planning, design and development—Precinct Codes and General Codes—outlined for each precinct.<sup>3</sup>

The study area is within the following Designated Areas precincts: City Hill; West Basin; Constitution Avenue and Anzac Parade; Lake Burley Griffin and Foreshores; and Main Avenues and Approach Routes. The NCP contains a series of policies and principles that are relevant to each of these areas with applicable objectives or principles to the Project reproduced below:

### **Section 4.6—City Hill Precinct Code**

1. Maintain and promote the City Centre as the main commercial centre of Canberra and the region – with the City Hill Precinct as the preeminent heart of the City.
2. The design of buildings and the amenity and environmental quality of the main public spaces should result in an accessible, attractive, high quality and distinctive centre, consistent with the City's role as the major metropolitan centre and its location at one point of the National Triangle, the major organising element of the Central National Area.

3. That the City Hill Precinct provides a vibrant, interesting and lively centre with high levels of human activity.

5. The City Hill Precinct must complement and actively relate to, and integrate with, the existing and future structure of the rest of City.

#### **Section 4.7—West Basin Precinct Code**

5. Develop West Basin precinct with a mix of uses and create a public domain which demonstrates urban design excellence.

8. Enhance Commonwealth and Edinburgh Avenues as important physical, visual and symbolic links of Canberra.

9. Reinforce Commonwealth Avenue, a significant approach route and vista to Parliament House, as a corridor of activity, leading pedestrians from the city into the Parliamentary Zone.

#### **Section 4.8—Constitution Avenue and Anzac Parade Precinct Code**

5. Support Constitution Avenue with an integrated transport system and mix of land uses contributing to the life of the National Triangle.

7. Develop a built environment which demonstrates design excellence.

#### **Section 4.12—Lake Burley Griffin and Foreshores Precinct Code**

1. To conserve and develop Lake Burley Griffin and Foreshores as the major landscape feature unifying the National Capital's central precincts and the surrounding inner hills and to provide for National Capital uses and a diversity of recreational opportunities.

2. Lake Burley Griffin and Foreshores should remain predominantly as open space parklands while providing for existing and additional National Capital and community uses in a manner consistent with the area's national symbolism and role as the city's key visual and landscape element.

3. Lake Burley Griffin and Foreshores are intended to provide a range of recreational, educational and symbolic experiences of the National Capital in both formal and informal parkland settings with particular landscape characters or themes. These should be maintained and further developed to create a diversity of landscape and use zones which are integrated into the landscape form of the city and reflect the urban design principles for the National Capital.

#### **Section 4.15—Main Avenues and Approach Routes Precinct Code**

1. Establish and enhance the identity of the approaches to the Central National Area as roads of national significance and, where relevant, as frontage roads for buildings which enhance the National Capital function and as corridors for a possible future inter-town public transport system.

2. Ensure that works within the road reservations are carried out to the highest standards, by maintaining and enhancing landscaping, and by facilitating the flow of traffic as far as possible.
3. Reinforce and, where possible, express the integrity of the Griffin Plan's visual structure by strengthening the geometry and form of main avenues, vistas and public spaces.
4. Improve the urban design and streetscape qualities of the Main Avenues as approaches to the Central National Area.<sup>4</sup>

## Special Requirements

In accordance with Section 10(2) of the PALM Act, the NCP sets out special requirements for the development of any area (not being a Designated Area) that are desirable in the interests of the National Capital.<sup>5</sup> Areas of Commonwealth/National Land and Territory Land may both be subject to special requirements.

The Project study area includes an area of Territory Land that is subject to Special Requirements—City Centre. The NCP contains a series of policies and principles that are relevant to each of these areas with applicable objectives or principles to the Project reproduced below:

### Section 4.25—City Centre

City Centre's continued development should recognise its metropolitan significance and role, achieve a satisfactory relationship between City Centre and other development and features of the Central area, and meet the following principles:

- a. Future development and redevelopment in City Centre should aim both to reinforce City Centre's role as the prime metropolitan centre, and contribute to a diverse, lively and attractive character.
- b. The design of buildings and the amenity and environmental quality of the main public spaces should result in an accessible, attractive, high quality and distinctive centre consistent with City Centre's role as the major metropolitan centre and its location at one point of the National Triangle, Griffin's major organising element of the Central National Area.<sup>6</sup>

## 2.4 Environment Protection and Biodiversity and Conservation Act 1999 (Cth)

The EPBC Act is the Australian Government's central piece of environmental legislation. The definition of 'environment' in the EPBC Act includes the heritage values of places, i.e., 'the place's natural and cultural environment having aesthetic, historic, scientific or

social significance, or other significance, for current and future generations of Australians'.<sup>7</sup> The objectives of the EPBC Act include protecting the environment, especially Matters of National Environmental Significance (MNES), by providing a streamlined environmental assessment and approvals process and providing for the protection and management of important natural and cultural places.<sup>8</sup> It also provides protection of the environment for actions on, or impacting upon, Commonwealth land, and actions by Commonwealth agencies.<sup>9</sup> It is administered by the Department of Climate Change, Energy, the Environment and Water (DCCEEW) (formerly the Department of Agriculture, Water and the Environment).

As the study area includes and is adjacent to Commonwealth/National Land and areas nominated to the National Heritage List (NHL), relevant provisions of the EPBC Act apply to the Project.

## **2.4.1 National Heritage Places**

The EPBC Act establishes the NHL. The NHL comprises those places that have been assessed as having 'outstanding' heritage values for the nation against the criteria established under the EPBC Act. National Heritage places may be owned or controlled under any jurisdiction. National Heritage places are one of the nine MNES under the EPBC Act, which are subject to particular provisions of the EPBC Act.

The study area is within a nominated NHL area—'Lake Burley Griffin and Lakeshore Landscape'. A place which is nominated to the NHL is not formally identified as a National Heritage place (i.e., gazetted and included on the NHL) and, therefore, is not a MNES.

However, recognising the precautionary principle of the EPBC Act (Section 391), whereby a lack of full scientific certainty should not be used as a reason for postponing a measure to prevent degradation of the environment where there are threats of serious or irreversible environmental damage, identified heritage values should be managed as if they are listed and need to be considered when undertaking an action. As such, the nominated heritage places identified have been considered within this report as if they were listed and classified as MNES.

## **2.4.2 Commonwealth Heritage Places**

The EPBC Act establishes the Commonwealth Heritage List (CHL). The CHL comprises those places owned or controlled by the Commonwealth that have been assessed as having 'significant' heritage values against the criteria established under the EPBC Act. Section 341Y of the EPBC Act requires Commonwealth Heritage places to be managed in

accordance with the Commonwealth Heritage management principles, as set out in Schedule 7B of the EPBC Regulations.

Section 2.4 of the NCP states that the NCA will consider all heritage places in Designated Areas as Commonwealth Areas for the purposes of protecting the environment in the manner currently afforded under the EPBC Act, unless they are managed by the ACT Government and included in the ACT Heritage Register.<sup>10</sup>

### **2.4.3 Approvals and ‘Controlled Actions’**

The EPBC Act requires proponents to undertake a self-assessment to determine whether an action is likely to have a significant impact on the environment. For heritage, this means the heritage values of a place listed on or nominated to the NHL or CHL. If the proponent believes the action is likely to have a significant impact, it must be referred to the Minister via DCCEEW.

The Minister makes the decision as to whether the referred action requires approval under the EPBC Act and on the process of assessment, or whether the action is unacceptable and should not proceed. A ‘controlled action’ is subject to assessment and approval under the EPBC Act. A ‘not controlled action particular manner’ means that approval is not required if undertaken in the manner specified. In contrast, an action that is ‘not controlled’ means that approval is not required if the action is taken in accordance with the referral.<sup>11</sup>

An EPBC referral (EPBC 2019/8582) has been submitted for the Project. According to the Notification of Referral Decision for the City to Commonwealth Park Light Rail Project dated 10 January 2020, the Department of Environment and Energy (now DCCEEW) determined that the Project is to be a ‘controlled action’ and will be assessed through preliminary documentation. MPC received a Conditional Approval from the Department on 2 February 2021. Heritage values management has not been determined as a controlling provision for preliminary documentation.

## **2.5 Heritage Act 2004 (ACT)**

Aboriginal and non-Aboriginal heritage places and objects in the ACT are protected under the ACT *Heritage Act 2004* (Heritage Act). The legislation establishes a system for recognising, registering and conserving natural and cultural heritage places and objects, including Aboriginal places and objects, in the ACT—the Heritage Council and the Heritage Register. Amendments made to the Heritage Act, passed on 25 September 2014, formally adopted the HERCON (Heritage Convention) criteria for assessing heritage significance.

The ACT Heritage Register means that a place or object is:

- of heritage significance to the people of the ACT and enriches understanding of the ACT's history and identity;
- legally protected under the Heritage Act, including the application of heritage guidelines; and
- requires advice by the ACT Heritage Council on development issues to improve conservation outcomes.

Places listed on the ACT Heritage Register may have directions about their conservation outlined in a heritage guideline which will determine how development is governed. Heritage guidelines directly affect the advice given by the ACT Heritage Council for development approval. They are a statutory instrument and made subject to a public consultation process under the Act. Pursuant to Section 27 of the Heritage Act, a function under the Act that relates, directly or indirectly, to the conservation of a place or object must be exercised in accordance with any applicable heritage guidelines.

A SHE is required under the Heritage Act for any proposed activity that is likely to diminish the heritage significance of the place. It is required by the ACT Heritage Council in its consideration of relevant information when assessing a development application. Potential impacts from future development are assessed and mitigation measures are addressed through the preparation of a SHE. Measures are identified to mitigate any adverse impacts and ensure protection of heritage significance.

As the study area includes a number of places (refer to Section 4.2) that are listed or nominated to the ACT Heritage Register, relevant provisions of the Heritage Act apply.

MPC sought advice from ACT Heritage on the SHE process for the proposed works adjacent to the Melbourne Building. ACT Heritage advised that the proposed planting is outside the listed boundary of the building and in accordance with the building's CMP approved by the ACT Heritage Council. As such, the landscaping concept is supported by ACT Heritage—subject to the use of root barriers for trees.<sup>12</sup>

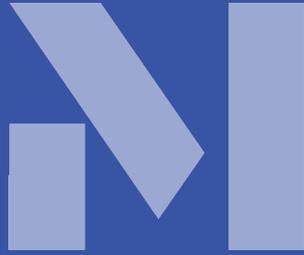
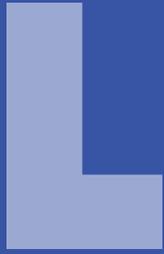
## 2.6 Endnotes

<sup>1</sup> National Capital Authority 2019, *National Capital Plan*, Australian Government p 12.

<sup>2</sup> Australian Government/National Capital Authority, 'Designated Areas', viewed 22 July 2020 <<https://www.nca.gov.au/planning-heritage/about-planning-act/designated-areas>>.

- <sup>3</sup> National Capital Authority 2019, *National Capital Plan*, Australian Government p 39.
- <sup>4</sup> National Capital Authority 2019, *National Capital Plan*, Australian Government pp 88–192.
- <sup>5</sup> National Capital Authority 2019, *National Capital Plan*, Australian Government p 9.
- <sup>6</sup> National Capital Authority 2019, *National Capital Plan*, Australian Government pp 234–236.
- <sup>7</sup> Australian Government, *Working Together—Managing Commonwealth Heritage Places: A Guide for Commonwealth Agencies*.
- <sup>8</sup> Department of Agriculture, Water and the Environment, 'About the EPBC Act', viewed 22 July 2020, <<https://www.environment.gov.au/epbc/about>>.
- <sup>9</sup> Department of Agriculture, Water and the Environment, 'Glossary', viewed 22 July 2020, <<http://www.environment.gov.au/epbc/about/glossary#significant>>.
- <sup>10</sup> Australian Government/National Capital Authority, *The National Capital Plan*, revised December 2019.
- <sup>11</sup> Department of the Environment and Energy, 'Environmental Assessment Process: Referral, assessment/decision whether to approve flowchart', viewed 22 July 2020, <<http://www.environment.gov.au/resource/environment-assessment-process-0>>.
- <sup>12</sup> Pers Comms, ACT Heritage to Major Projects Canberra, dated 30 November 2022, provided to GML by Major Projects Canberra 30 November 2022.

# 3 Proposed Action



## 3 Proposed Action

### 3.1 Introduction

This section provides an overview of the proposed action, provided to GML by MPC. The following is an excerpt from the Aecom prepared Environmental Assessment, dated 14 December 2022.

### 3.2 Project Description

Major Projects Canberra (MPC) proposes to extend the Canberra Light Rail (CLR) network from its current southern terminus at Alinga Street, Canberra City, to Woden (Light Rail to Woden). Light Rail to Woden is being progressed in two, self-contained stages for a faster project delivery: Stage 2A City to Commonwealth Park (the Project, the subject of this Assessment), and Stage 2B Commonwealth Park to Woden.

The Project is needed as part of a coordinated and holistic delivery of a series of major projects in Canberra City and surrounds, to realise the strategic planning and development for Canberra City presented in the Territory Plan, the Transport for Canberra Plan and the National Capital Plan (NCP). The Project also supports the ACT Government's vision for a compact and efficient city and reaching net zero by 2045. Furthermore, the Project is a specific directive identified as a key strategy for developing and delivering an efficient, compact and sustainable Canberra City within the Moving Canberra Plan, The Light Rail Network Plan and The ACT Planning Strategy.

The Project would involve extending the light rail network from the current southern terminus at Alinga Street to a proposed stop at Commonwealth Park. A full project description for the Project is provided in Chapter 3.0 of the Environmental Assessment.

The Project would include the following key elements:

- An extension of approximately 1.7 km of track, extending southbound via the western side of London Circuit before continuing on Commonwealth Avenue
- A new bridge across Parkes Way
- Three stops are proposed to be located at key points along the alignment to provide access to the light rail where there is expected to be high demand: Edinburgh Avenue Stop, City South Stop and Commonwealth Park Stop.
- One scissor crossover (crossover of railway tracks) to allow LRVs to reverse direction

- Utility, stormwater drainage and streetlighting adjustments, relocations and provisions
- Landscaping features sympathetic with Canberra’s design as envisioned by the Griffins’ along with requirements set out in other Territory and Australian Government policy
- ‘Green tracks’ running along Commonwealth Avenue and Northbourne Place that involve planting grass or shrubs between and besides the alignment
- Intersection layout, traffic signal phasing and road traffic speed changes along the alignment, including new intersections and modifications to existing intersections
- Pedestrian footpaths and crossing modifications
- Road widening and verge and kerb line changes.

The completed Project, including its key features and elements, is shown on Figure 3.1.

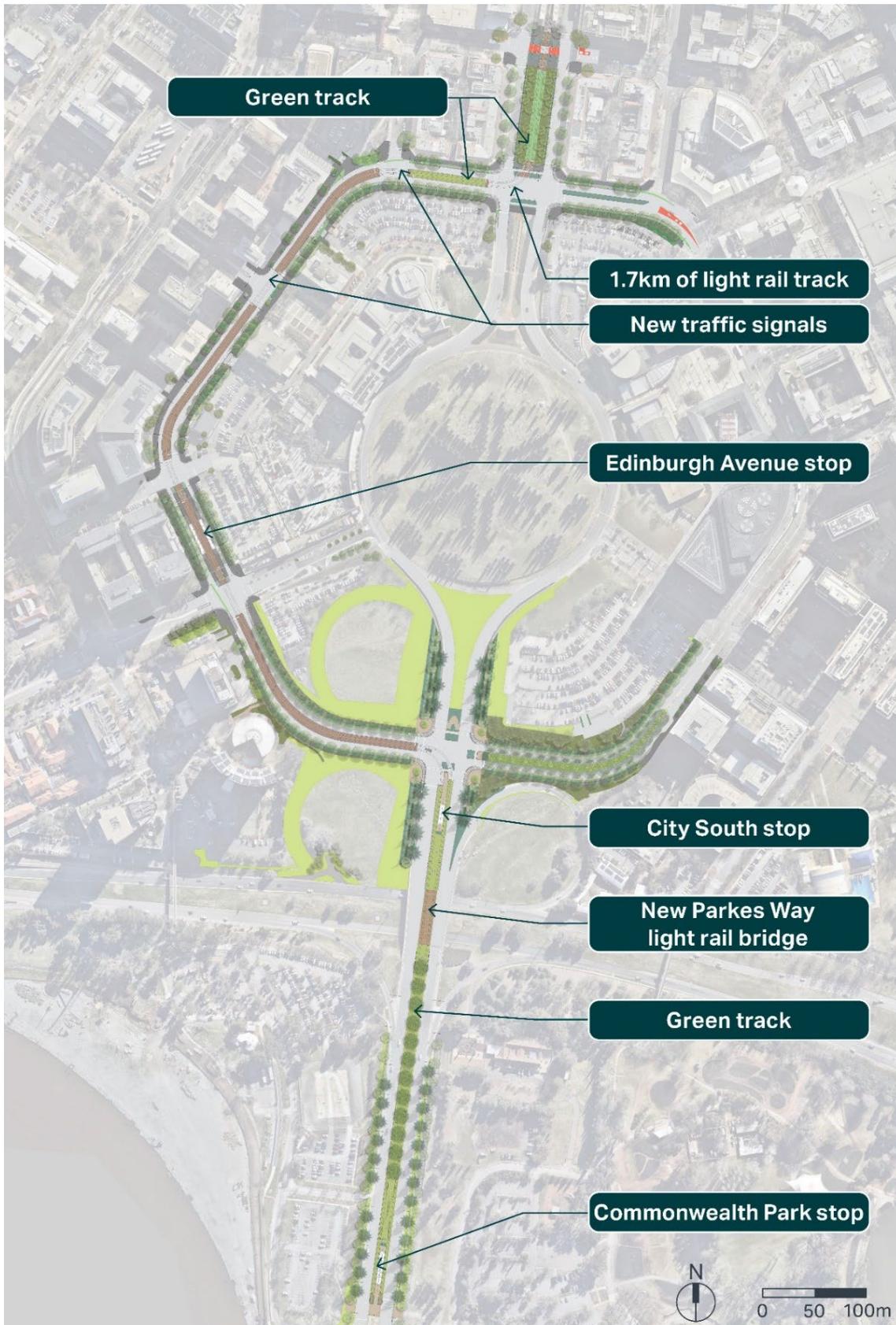


Figure 3.1 The Project and its key features (Source: Aecom Environmental Assessment, Technical reports project description, 15 December 2022)

### 3.3 Construction

Construction activities associated with the Project would occur within a footprint referred to as the 'delivery phase area' (Figure 3.2). The operation of the Project would occur within a subset of the delivery phase area. The delivery phase area includes both Designated Land and Territory land. This Assessment addresses the Project in its entirety to allow for consideration of the Project as a whole.

Construction of the Project is anticipated to commence in 2024 with completion of construction planned in 2026. However, the duration of the construction would be dependent on final construction methodology and staging selected by the delivery contractor, as well as any efficiencies identified during the program. Testing and commissioning would commence in the latter stages of construction and continue for a period of up to nine months following the conclusion of main works. Successful completion of the testing and commissioning programme would allow the Project Contractor to obtain accreditation from the Office of the National Rail Safety Regulator (ONRSR). Once complete, the system would be ready to be handed over for operation.

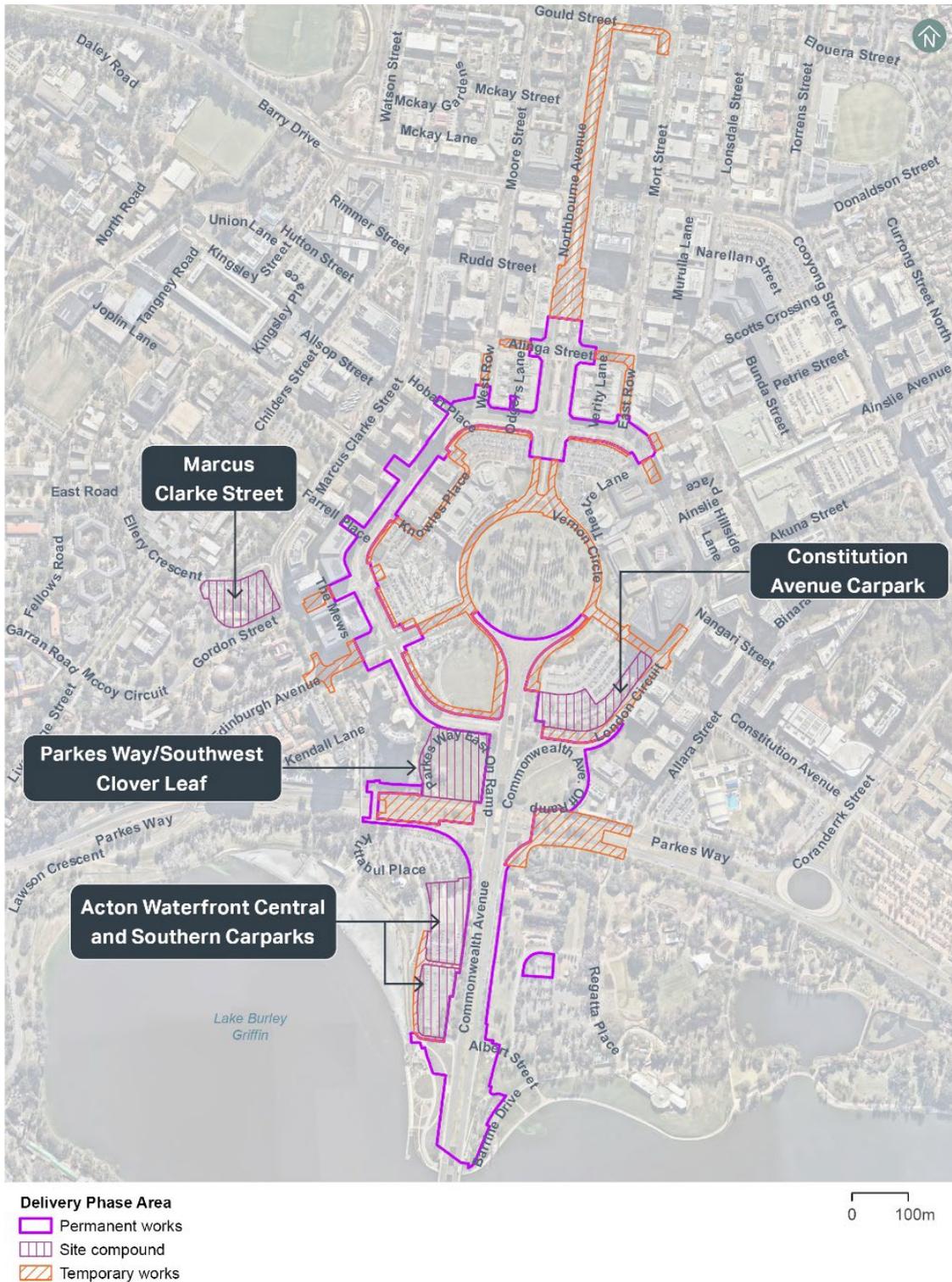


Figure 3.2 Delivery phase area (Source: Aecom Environmental Assessment, Technical reports project description, 15 December 2022)

### 3.3.1 Site Establishment and Preparatory Works

There would be four major compound sites, as shown on Figure 3.2. Several temporary construction compounds, stockpile sites and laydown areas would also be required as part of the Project. Upon completion of the works all established site compounds would be reinstated prior to handing back to the respective land owners.

There are utilities within the delivery phase area which are affected to various degrees by the Project. Most protection, decommissioning and removal of utilities would be completed early in the Project construction period, but may also be staged during the construction period depending on construction planning requirements.

Traffic management arrangements would include full and partial road closures and would introduce necessary traffic detours to direct the travelling public around work sites and construction access and egress points. Notification of these closures would be advertised in advance and sufficient time to deliver written notice would be required for the local businesses and residents. All temporary traffic management arrangements and diversionary routes would be agreed and approved by TCCS (RoadsACT) prior to implementation.

### 3.3.2 Construction Strategy

The construction strategy of the Project has been divided by construction zones, major intersections and the Parkes Way Bridge.

Table 3.1 Construction staging locations.

Location	Description
<b>Block closures</b>	<p>These are construction areas between major intersections. Block closures would be used to close off entire sections of the road network, typically between blocks to allow the Project contractor full access to the worksite and the best opportunity to complete the Project most efficiently. Stops would be constructed upon the occupation of the block section where it is located. Blocks include:</p> <ul style="list-style-type: none"> <li>• Northbourne Avenue (between Alinga Street and London Circuit)</li> <li>• London Circuit (between Northbourne Avenue and Petrie Plaza)</li> <li>• London Circuit (between Northbourne Avenue and West Row)</li> <li>• London Circuit (West Row to Knowles Place North)</li> <li>• London Circuit (between Knowles Place North and Gordon Street)</li> <li>• London Circuit (between Gordon Street and Edinburgh Avenue)</li> <li>• London Circuit (between Edinburgh Avenue and Commonwealth Avenue)</li> <li>• Commonwealth Avenue (between London Circuit and Parkes Way)</li> </ul>

Location	Description
	<ul style="list-style-type: none"> <li>Commonwealth Avenue (between Parkes Way and Lake Burley Griffin).</li> </ul>
<b>Major intersections</b>	<p>The major intersections include Northbourne Avenue and Alinga Street, Northbourne Avenue and London Circuit, London Circuit and Edinburgh Avenue, London Circuit and Gordon Street and Commonwealth Avenue and London Circuit.</p> <p>For works within major intersections, wherever possible the construction of the intersection would be carried out during normal working hours, within the confines of a protected worksite. Closures, where required, are expected to be carried out over several weekends (typically from Friday 10pm to Monday 6am) for a maximum of 56 hours at a time, except during construction of track slab where a continuous 80 hours would be required to facilitate concrete curing and ensure adequate concrete strength is achieved prior to intersection reopening and eventual trafficking.</p> <p>The Commonwealth Avenue and London Circuit intersection would not require full closure, and would be subject to a contraflow arrangement for several weeks.</p>
<b>Parkes Way bridge</b>	<p>A new bridge would be built between the two road bridges on Commonwealth Avenue over Parkes Way. In appearance, the gap would be infilled to create a single surface. The new rail bridge would be supported on 8 concrete piles (four piles for each bridge abutment) and concrete-walled abutments.</p> <p>The construction of temporary roads allows for the continued movement of traffic during bridge construction activities, with the location of temporary roads selected by the contractor in line with the Roads ACT requirements.</p>

### 3.3.3 Operation

The Project would be an extension of the City to Gungahlin service and would therefore have the same frequency. It would take approximately six to nine minutes to travel between Alinga Street and Commonwealth Park.

A minimum of five LRVs would be required for the expansion of the CLR network. The new LRVs would be similar in appearance, size and performance to those that operate on the current CLR network. These LRVs and modifications to the stabling yard at the Mitchell Depot would be complete prior to the operation of this Project.

A wire free track is proposed for the Project alignment with LRVs operating using onboard battery power supply between the current Alinga Street southern terminus and the proposed Commonwealth Park terminus. Battery storage capacity for additional and existing LRVs has been proposed to minimise visual impact in landscape and visual sensitive zones, such as Commonwealth Avenue.

Two track forms, a permanent form of rail infrastructure that provides a surface for rail vehicles to move, are required for the Project. One trackform would operate northbound and the other southbound, with a crossover installed on Commonwealth Avenue to allow

LRVs to change direction. Green track would also be included as part of the Project, in three locations: Northbourne Place, London Circuit between Northbourne Avenue and West Row, and Commonwealth Avenue between London Circuit and Albert Street. Non-potable water would be used for the irrigation of the Commonwealth Avenue green track.

### 3.3.4 Changes to the Road Network

The proposed light rail track would run within a median between opposing vehicular traffic flows for the entire length of the proposed alignment. The median would be between 80-150 mm high between intersections to minimise the possibility of road vehicles straying into the rail corridor. The median height would transition to be at grade just before each signalised intersection. This would facilitate vehicular and pedestrian movement across the track.

Road network changes required to accommodate the Project’s median light rail alignment and associated stops are provided in Table 3.2.

Table 3.2 Lane configuration.

Road	Proposed lane configuration
<b>London Circuit</b>	<ul style="list-style-type: none"> <li>The lane arrangement on London Circuit between Edinburgh Avenue and Commonwealth Avenue would remain unchanged</li> <li>Two 3.3m wide traffic lanes in each direction along London Circuit between Northbourne Avenue and West Row, including a dedicated westbound right turn lane to West Row</li> <li>A single 3.7m wide traffic lane in each direction along London Circuit between West Row and Edinburgh Avenue, except on the southbound approach to Gordon Street which would have a dedicated right turn lane.</li> <li>The posted speed limit along London Circuit would remain 40km/h except in the vicinity of the Edinburgh Avenue stop where the speed would be reduced to 20km/h because of the high pedestrian activity expected at the stop</li> <li>All on street parking and loading along London Circuit would be removed.</li> <li>Two new signalised intersections on London Circuit to facilitate right turns across the Project’s alignment at West Row and University Avenue. The remaining unsignalised intersections along London Circuit would be converted to left-in/left-out out<sup>1</sup>.</li> </ul>
<b>Alinga Street</b>	One lane in each direction on Alinga Street within the median on Northbourne Avenue. These lanes would be for buses only.
<b>Commonwealth Avenue</b>	No change
<b>Northbourne Avenue</b>	No change

<sup>1</sup> Right turn out from Knowles Place south permitted by emergency vehicles under signals

### **3.3.5 Active Transport Infrastructure**

The Project includes walking and cycling facilities or upgrades that aim to improve pedestrian and cyclist safety, connectivity and amenity within the study area, and in particular along London Circuit West and Commonwealth Avenue. Active transport infrastructure includes dedicated and separate pedestrian and cycling paths.

## **3.4 Alternatives Considered**

The Project includes walking and cycling facilities or upgrades that aim to improve pedestrian and cyclist safety, connectivity and amenity within the study area, and in particular along London Circuit West and Commonwealth Avenue. Active transport infrastructure includes dedicated and separate pedestrian and cycling paths.

### **3.4.1 Lake Crossing**

Alternative lake crossings at Kings Avenue (eastern corridor) and Acton Bridge (western corridor) were explored. These options were discounted due to technical and engineering challenges, increased journey time, access and distance to employment centres, cost, and consideration of future light rail routes. The Commonwealth Avenue (central corridor) was selected in consultation with various stakeholders as it would provide the most direct and quickest route south, better address existing and anticipated traffic issues in the Parliamentary Zone, be closer to key areas such as cultural institutions, and provide an opportunity to revitalise and 'activate' Commonwealth Avenue in line with the NCP.<sup>13</sup> This option is relevant to the Project because it was designed with the broader network in mind and therefore considered the continuity of the light rail system south over the lake. The Project was the subject of the Joint Standing Committee inquiry in 2018, which tested and confirmed that Commonwealth Avenue was appropriate as per the Inter-Town Public Transport Route.

### **3.4.2 London Circuit Alignment**

An eastern alignment around London Circuit was considered, but it was determined that future light rail routes, particularly an east–west link from Belconnen to Russell and the airport, would better serve this area of London Circuit. Additionally, the western alignment would serve City West and the Australian National University and support the proposed developments at City Hill and West Basin. If the western alignment was not included in the north–south light rail spine it was considered unlikely that the western side of London Circuit would ever be served.<sup>14</sup>

### **3.4.3 Stop Locations**

Nine potential stop locations were considered, and three of these were selected. The other six stop options were discounted because the three selected locations would optimise connectivity between precincts, employment centres and residential paths and link into existing bus services, footpaths and cycle paths.<sup>15</sup> Stop locations were chosen in part to avoid obstructing significant views of heritage places.

### **3.4.4 Track Placement—London Circuit**

Three options for the placement of the tracks along London Circuit have been explored. These included inside running, outside running and median running tracks. Inside and outside running tracks were rejected because of issues with passenger accessibility, interference with road traffic operations, and incompatibility with future light rail routes.<sup>16</sup>

### **3.4.5 Track Placement—Commonwealth Avenue**

On-road running tracks along Commonwealth Avenue were explored, but were discounted in favour of median running because this alignment would support the function of Commonwealth Avenue as a transport corridor by retaining its existing road traffic capacity. This alignment would also retain the grassed median and landscape character of the Avenue.<sup>17</sup>

### **3.4.6 Power Systems**

Overhead line power and wire-free power options were explored. Wire-free was selected, based on advice from the NCA, as it would avoid the need to install poles and wires and minimise the visual impact in a heritage-sensitive environment.

## **3.5 Endnotes**

<sup>13</sup> ACT Transport—Transport Canberra and City Services, Gungahlin to Woden (via Barton) Light Rail: Submission to the Joint Standing Committee on the National Capital and External Territories, 15 June 2018, pp 21–23.

<sup>14</sup> ACT Transport—Transport Canberra and City Services, Gungahlin to Woden (via Barton) Light Rail: Submission to the Joint Standing Committee on the National Capital and External Territories, 15 June 2018, p 28.

- <sup>15</sup> Hassell Stop presentation, date unknown.
- <sup>16</sup> Arup/Hassell, City to Woden Light Rail Precinct Report Appendix G2 London Circuit Traffic Technical Note, 26 September 2018.
- <sup>17</sup> ACT Transport—Transport Canberra and City Services, Gungahlin to Woden (via Barton) Light Rail: Submission to the Joint Standing Committee on the National Capital and External Territories, 15 June 2018, pp 23–24.

## 4 Heritage Values



# 4 Heritage Values

## 4.1 Introduction

The EPBC Act Significant Impact Guidelines 1.2 indicate it is necessary to identify the environmental context of an action and the general features or components of the environment in the area where the action will take place.

This section provides an overview of the historic heritage places (national, Commonwealth and ACT) located within or adjacent to the study area and key extracts from heritage management documents/guidelines that are relevant to the Project. The potential for historic archaeological sites, Indigenous values and natural heritage values located within the study area are also discussed.

## 4.2 Historic Heritage Values

Table 4.1 lists historic heritage places that are registered or nominated to statutory heritage registers, including the NHL, CHL and ACT Heritage Register, that are located within or immediately adjacent to the study area. Figure 4.1 and Figure 4.2 show the boundaries of the heritage places in relation to the study area.

Summaries are provided in Sections 4.2.1 and 4.2.2 and 4.2.3 of the heritage values/significance of each place, key attributes or intrinsic features, and excerpts from relevant heritage management documents/guidelines.

Table 4.1 Historic Heritage Places on the NHL, CHL or ACT Heritage Register Located Within or Immediately Adjacent to the Study Area.

Place Name	Register	Status/ID
Lake Burley Griffin and Adjacent Lands	Commonwealth Heritage List	Listed/105230
Australian Academy of Science Building	National Heritage List	Listed/105741
Parliament House Vista	Commonwealth Heritage List	Listed/105466
Reserve Bank of Australia	Commonwealth Heritage List	Listed/105396
City Hill	ACT Heritage Register	Registered/20002
Sydney and Melbourne Buildings	ACT Heritage Register	Registered/20032

Place Name	Register	Status/ID
ANZ Bank Building (former ES&A Bank)	ACT Heritage Register	Registered/20150
The Civic Square Precinct	ACT Heritage Register	Registered/620
Law Courts Precinct	ACT Heritage Register	Nominated
Hotel Acton (Acton House)	ACT Heritage Register	Registered/399
Ian Potter House (Beauchamp House)	ACT Heritage Register	Registered/20091

The following two places have values which have been identified through nominations to the CHL and NHL and include attributes relevant to this project. The places are no longer being considered by the Australian Heritage Council (AHC).

Table 4.2 Other Historic Heritage Places Located Within or Immediately Adjacent to the Study Area.

Place Name	Register	Status/ID
Canberra the Planned National Capital	Nominated: National Heritage List	Place not included in NHL
National Land Roads	Nominated: Commonwealth Heritage List	No longer eligible for PPAL

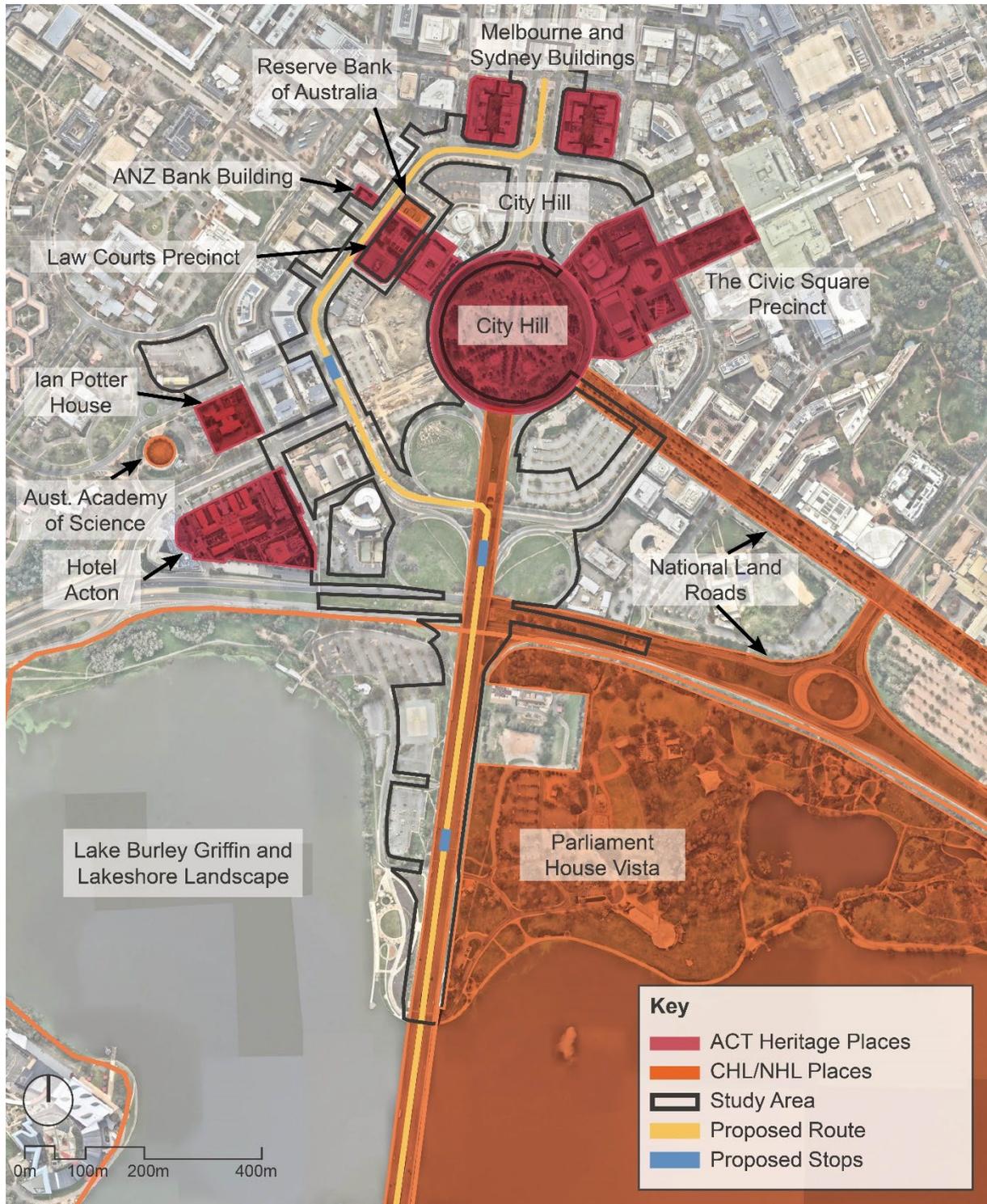


Figure 4.1 Aerial showing the study area outlined in black and the locations of historic heritage places. (Source: GML 2020)

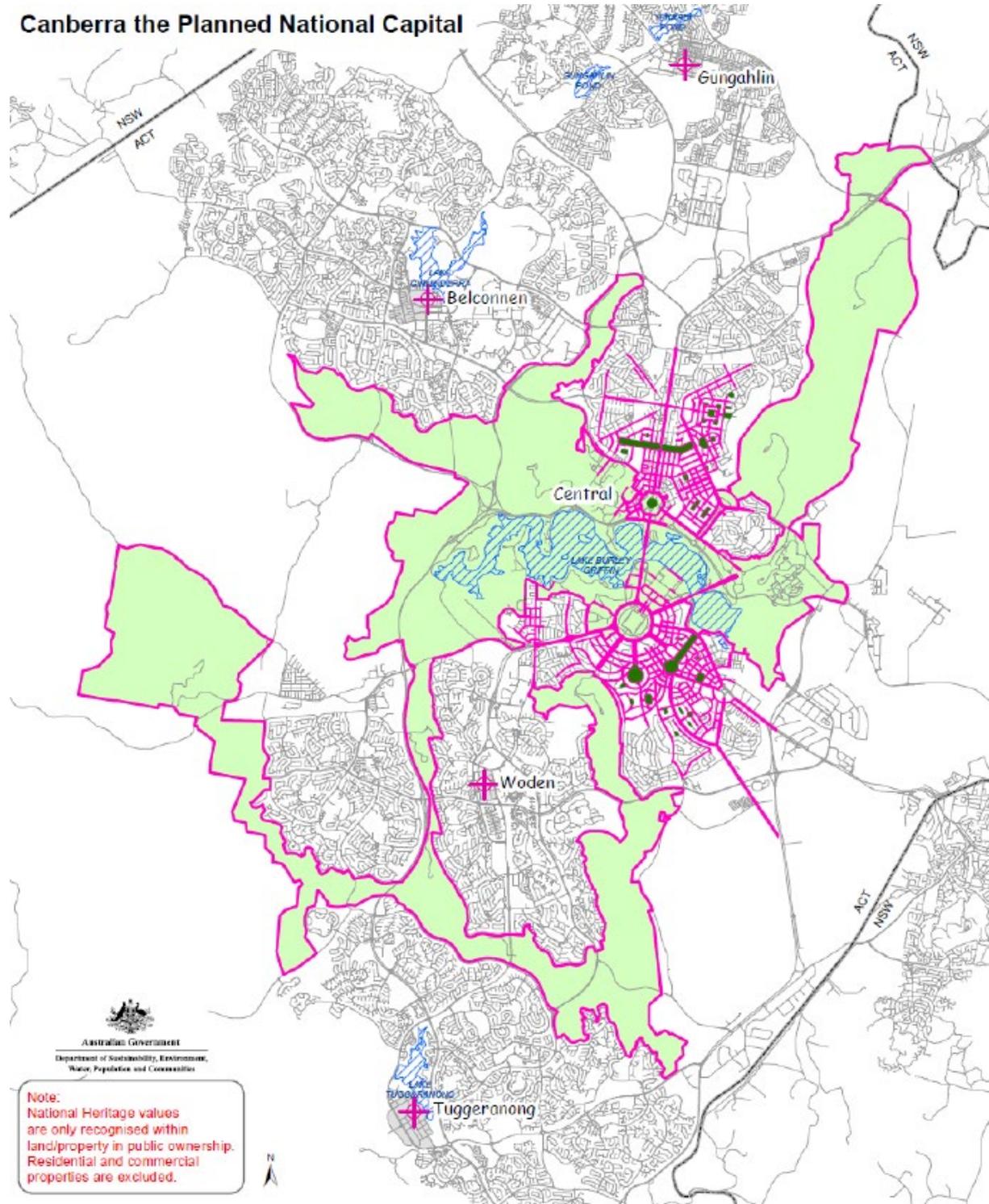
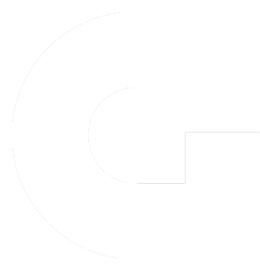


Figure 4.2 Map showing the extent of the Canberra the Planned National Capital. The place boundary is indicated by the solid pink line. (Source: Department of the Environment)



## 4.2.1 National and Commonwealth Heritage Places

### Lake Burley Griffin

Heritage Values <sup>18</sup>	Key Attributes <sup>19</sup>	Management Policies <sup>20</sup>
<p>The following is a summary of Lake Burley Griffin’s National and Commonwealth Heritage values.</p> <ul style="list-style-type: none"> <li>Historically, Lake Burley Griffin has importance for its association with the creation of the national capital and it reflects two key periods of urban design: the City Beautiful/Garden City discourse and the later discourses of International Modernism.</li> <li>Lake Burley Griffin is an important component of the Griffin plan for Canberra and its subsequent realisation in central Canberra’s designed landscapes, in particular the Land and Water Axes.</li> <li>Lake Burley Griffin is considered to have outstanding heritage value to the nation in its own right as a designed landscape of creative genius and high technical achievement.</li> <li>Lake Burley Griffin and surrounds possess research potential, and Lake Burley Griffin is Australia’s largest artificial, ornamental lake.</li> </ul>	<p>Emphasis (bold) added by GML to information from the Lake Burley Griffin CHL citation.</p> <ul style="list-style-type: none"> <li>The <b>lake landscape</b> including its edge treatments, <b>bridges</b>, dam, <b>Captain Cook Water Jet</b> and islands and its <b>relationship</b> to the <b>geometry of Griffin’s Plan</b>.</li> <li>The size and diverse shape of the lake, and its location within Canberra.</li> <li><b>Public access</b> to and use of the lake and its foreshores.</li> <li><b>Quiet and peaceful qualities</b>, particularly of secluded areas in the lower reaches</li> <li>The <b>presence of the lake in views</b> of and within central Canberra, and the <b>availability of views</b> from publicly accessible locations.</li> <li>The <b>qualities of naturalness</b>, including the places with natural habitat values.</li> <li>The integrity of the Griffin land/water axis and associated</li> </ul>	<p>The Lake Burley Griffin and Adjacent Lands HMP 2008 provides the following conservation policies relevant to the Project:</p> <p><b>Policy 1.6</b>  <i>Conserve and manage the integrity of the formal design elements of the Study Area deriving from the Griffin plan and the later design and construction of the lake and its foreshores.</i></p> <p><b>Action 1.6.1</b>  <i>Conserve the integrity of the axes, vistas and visual links with the surrounding landscape (including Black Mountain, Mount Ainslie and Red Hill) and conserve the visibility of the lake from public open spaces and public institutions. This will support the continued appreciation of the lake as a unifying and linking element for the close and distant topography in the landscape and as the setting of the surrounding buildings and open space areas.</i></p> <p><b>Action 1.6.2</b>  <i>Conserve the visibility of the waters of the lake in views from within Canberra, including the retention of open views to the water from roads and other public use areas (Commonwealth Avenue, Parkes Way, the cycle paths) as well as local secluded vistas from near the lake shore.</i></p>

**Heritage Values<sup>18</sup>**

- The presence of water in the landscape is an overriding and essential component of the lake’s valued aesthetic qualities.
- Lake Burley Griffin is valued highly by communities for its landmark value, as a symbol of Canberra and as an iconic cultural landscape which for many is a symbol of local identity.
- Lake Burley Griffin is highly valued as an important element in the Canberra landscape, frequently visible and ever-present in daily life, acting as a reference point, backdrop and important gathering place within the heart of the city.

**Key Attributes<sup>19</sup>**

- lands (Mount Ainslie, Black Mountain, Parliament House Vista etc.).
- Formal design elements especially Central basin and its foreshores in relation to the Parliamentary Triangle and other elements of the Griffin Land Axis.

**Management Policies<sup>20</sup>**



Figure 4.3 View southeast from Commonwealth Avenue toward the Captain Cook Water Jet on Lake Burley Griffin. (Source: GML 2019)

## Parliament House Vista

Heritage Values <sup>21</sup>	Key Attributes <sup>22</sup>	Management Policies <sup>23</sup>
<ul style="list-style-type: none"> <li>The central national area of Canberra is strongly associated with the history of politics and government in Australia and the development of Canberra as the Australian National Capital.</li> <li>The Vista has high aesthetic significance due to the visual impact of the extensive open sweeping vista along the land axis that can be experienced in two directions, the designed axes set within natural features of forested hills, patterns and textures of architectural massing accentuated by planned open spaces, water planes and tree plantings that are arranged across the area.</li> <li>The Vista is significant for its visual drama with its ability to engage viewers in the visual perspective of the sweeping vista to the terminal features.</li> <li>The Vista is highly significant for its symbolic representation of the democratic interchange between the people and their elected representatives and its use of the natural landforms to generate a strong planning geometry.</li> <li>The Parliament House Vista is the core of the most ambitious and most</li> </ul>	<p>Emphasis (bold) added by GML to the Parliament House Vista CHL citation.</p> <ul style="list-style-type: none"> <li>The <b>concentration of buildings, parklands and gardens</b> that support Commonwealth parliamentary and governmental activity as well as, to some extent, national cultural life, such as Old Parliament House and Curtilage, East Block Government Offices, the National Library of Australia, the High Court of Australia and the Aboriginal Embassy site.</li> <li>The <b>extensive vista along the land axis</b>, the forested hills, patterns and textures of architectural massing accentuated by <b>planned open spaces, water features and tree plantings</b>, artworks, the <b>terminal features</b> plus the interplay of scale and texture in the designed landscape.</li> <li>The <b>whole of the vista</b>, including all elements and features contained within it, as well as the natural wooded hills beyond.</li> <li>Memorial features including sculptures, plaques, commemorative trees, water features and gardens. Also, recreational landscape spaces and gathering spaces in which the community may demonstrate.</li> </ul>	<p>The Parliament House Vista Area HMP 2010 provides the following conservation policies relevant to the Project:</p> <p><b>Policy 42 Protection of Setting</b></p> <p>The NCA will protect the setting of the Parliament House Vista to the extent possible within its powers. Beyond this, the NCA will encourage such protection for those areas which fall outside its responsibilities.</p> <p>The NCA will protect the forested character of the surrounding hills, and will protect or encourage protection of views to the hills from within the Parliament House Vista.</p> <p><b>Policy 43 Protection of views to and from the Area</b></p> <p><i>The significant views to and from the Vista will be protected. The significant views include:</i></p> <ul style="list-style-type: none"> <li><i>To the surrounding hills, especially Mount Ainslie, Black mountain and Mount Pleasant;</i></li> <li><i>To the current Parliament House;</i></li> <li><i>From Commonwealth and Kings Avenues, especially the bridges.</i></li> </ul>

Heritage Values <sup>21</sup>	Key Attributes <sup>22</sup>	Management Policies <sup>23</sup>
<p>successful example of twentieth century urban planning in Australia.</p> <ul style="list-style-type: none"> <li>The area has strong and special associations with the broad Australian community because of its social values as a symbol of Australia and the Federal Government.</li> <li>The central national area has a special association with its designers—Walter Burley Griffin and Marion Mahony Griffin; chief architect of the Commonwealth Government—John Smith Murdoch; Superintendent of Parks, Gardens and Afforestation—Thomas Charles Weston; and notable NCDC planners—Sir John Overall, Peter Harrison and Paul Reid.</li> </ul>	<ul style="list-style-type: none"> <li>The whole of the vista, its <b>planned layout</b>, and the view from the top of Mount Ainslie which illustrates the realisation of Marion Mahony Griffin's perspective drawing.</li> </ul>	



## Reserve Bank of Australia

Heritage Values <sup>24</sup>	Key Attributes <sup>25</sup>	Management Policies <sup>26</sup>
<ul style="list-style-type: none"> <li>Historically, the Reserve Bank is important as the nation’s central bank, having evolved from the separation of the central banking (monetary policy) function from the commercial, customer focussed activities of the Commonwealth Bank.</li> <li>The Reserve Bank of Australia is a major component of the Law Courts Precinct and one of three buildings demonstrating the Stripped Classical style.</li> <li>The design of the Reserve Bank is additionally important for its overall impression of institutional security.</li> <li>The sculptural work in the Reserve Bank, by Gerald and Margo Lewers, demonstrates the sculptural styles of the times and the role of art to adorn public places.</li> <li>The aesthetic importance of the Reserve Bank building, which links harmoniously with the precinct, is created by the elegance of its minimalist design style, the low scale and simple building form, and the use of pale grey marble cladding which provides a light visual quality.</li> <li>The location of the bank in the precinct, being visual [sic] subservient to the former Law Courts building,</li> </ul>	<p>Emphasis (bold) added by GML to the Reserve Bank of Australia CHL citation.</p> <ul style="list-style-type: none"> <li>The whole <b>bank building</b>.</li> <li>The building’s <b>Stripped Classical style</b> demonstrated by typical features such as simple rectangular forms, echoes of colonnades, symmetry and horizontal skyline, geometric minimalist style of landscape plaza.</li> <li>The sculptural work of Gerald and Margo Lewers.</li> <li>Its <b>harmony within</b> the precinct resulting from style, scale, form, colour and materials.</li> <li>Its <b>visual relationship</b> to the axis of the <b>Black Mountain</b> vista.</li> <li>The building’s designed <b>relationship to the Law Courts Precinct</b>.</li> <li>The building’s <b>impression of institutional security</b>.</li> <li>Timber counter and furniture contemporary with the design of the building.</li> </ul>	<p>The Reserve Bank of Australia (Canberra Branch) HMP 2019 provides the following conservation policies relevant to the Project:</p> <p><b>Overall Policy Statement</b></p> <p><i>The Reserve Bank of Australia Canberra Branch is a significant element of our cultural heritage and retains a high external and moderate internal degree of integrity from its original construction. The objective of the following conservation policies is that the heritage significance of the place should be managed in a manner appropriate to conserve the original elements of the building and thereby its significance. At the same time the building needs to continue to be used as a banking and office facility.</i></p> <p><b>Policy 3.1</b></p> <p><i>Extensions and alterations to the building are not supported.</i></p> <p><b>Policy 5.1</b></p> <p><i>Original details and finishes must be recorded prior to any major refurbishment or modification. Recording should be undertaken by a heritage specialist and recording data submitted to the relevant heritage authority.</i></p> <p><b>Policy 6.8</b></p>

**Heritage Values<sup>24</sup>**

enhances the latter’s projection of authority and dignity.

- The Reserve Bank contributes enframement to the visual axis of the Black Mountain vista.

**Key Attributes<sup>25</sup>**



Figure 4.4 View east toward the Reserve Bank frontage along London Circuit.  
(Source: GML, 2020)

**Management Policies<sup>26</sup>**

*Stakeholder consultation must occur with all proposed actions to the place or its fabric which will have significant impact on the Commonwealth Heritage value of the Place and stakeholders be provided with an opportunity for comment.*

## Australian Academy of Science Building

Heritage Values <sup>27</sup>	Key Attributes <sup>28</sup>	Management Policies <sup>29</sup>
<p><b>Statement of Significance:</b></p> <p>The formation of the Australian Academy of Science marked the post-war development of the Australian scientific community at an international level, providing Australian science with national presence and an international face. The creation of the Academy and the Shine Dome is directly related to scientists such as Sir M L Oliphant, Dr. I Clunies Ross, Dr J C Eccles, Sir D Mawson and A C D Rivett, who were instrumental in the establishment of the Academy.</p> <p>The construction of the Australian Academy of Science Building was a significant technical achievement and a milestone in the Australian construction industry. The load bearing capacity of the large radius copper clad dome is formed by the moat surrounding the building, making the dome extremely stable, preventing movement and the need for expansion joints. The internal walls do not structurally support the dome.</p> <p>The Academy building is an excellent example of the Geometric Structuralism, demonstrating clarity of design philosophy in the uncompromising, integrated and consistent architectural style and detailing of the building’s exterior and interior. The</p>	<p>Attributes that embody the heritage values of the Australian Academy of Science Building have not been formally specified. The following relevant attributes have been distilled from the statement of significance and the Shine Dome HMP 2018. Emphasis (bold) added by GML to the Australian Academy of Science Building CHL citation.</p> <ul style="list-style-type: none"> <li>• <b>Freestanding copper clad dome form and structure.</b></li> <li>• Perimeter wall and cloister.</li> <li>• Encircling water filled moat and main entry bridge.</li> <li>• Interior design and furnishings.</li> <li>• Original uses of building.</li> <li>• Surrounding garden setting that allows <b>clear view to building.</b></li> </ul>	<p>The Shine Dome HMP 2018 provides the following conservation objectives relevant to the Project:</p> <ul style="list-style-type: none"> <li>• Conservation Objective 1: to ensure that any decisions or actions which will impact on the significance of the place are based upon professional conservation principles.</li> <li>• Conservation Objective 2: ensure ongoing use conserves the heritage values of the place and the associate [sic] values and meanings.</li> <li>• Conservation Objective 3: to retain the existing and historical forms, details and character of the place and significant elements while allowing ongoing effective use as conference/meeting venue. Changes to the buildings and site can be permitted if essential for the ongoing conservation of the place provided the impact on heritage significance is nil or minimal.</li> </ul>

**Heritage Values<sup>27</sup>**

**Key Attributes<sup>28</sup>**

**Management Policies<sup>29</sup>**

dome is an innovative structure, reflecting the bold modernism of the era, but sensitively complementing the surrounding landscape. The form, structural integrity, materials selection, geometry, functionalism symmetrical planting and sensitivity to the setting make the building rare for 1959.

The Australian Academy of Science Building represents the work of one of the most prominent Australian architects for the era. The building was the culmination of Roy Grounds' architectural development. The multiple award-winning design is seen as the purist [sic] example of Grounds' structuralist work in Australia.

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## 4.2.2 Other Relevant Heritage Places

In 2009 a nomination to the National Heritage List was received for 'Canberra the Planned National Capital'. The AHC assessed this nomination and found that the place had outstanding heritage values that met the threshold for National Heritage criteria (a), (e), (f), (g) and (h) under the EPBC Act.<sup>30</sup> In May 2022 the Minister for the Environment decided not to include the nominated place on the NHL 'based on consideration of the Council's assessment report, the public comments received and ongoing correspondence with the ACT Government as a key stakeholder and in the interests of bring this long-standing issue to a close'.<sup>31</sup> However, the nationally important heritage values identified by the AHC are still protected under the EPBC Act within the study area. The values identified in the assessment, which includes attributes relevant to this project, are summarised below. The following table is a summary from the draft Canberra, the Planned National Capital: National Heritage place EPBC Act Referral Guidelines prepared by the Department of the Environment in 2012, which include the values and attributes identified by the AHC.

### Canberra the Planned National Capital

Heritage Values <sup>32</sup>	Key Attributes <sup>33</sup>
<ul style="list-style-type: none"> <li>• Canberra has outstanding heritage value to the nation because of the place's importance in the history of Australia's urban planning and Australia's evolving democracy</li> <li>• Canberra has outstanding values to the nation because of the place's importance in exhibiting an ensemble of designed urban landscapes and settings that display and project its status, function and significance as the national capital. These features are valued highly by the Canberra and Australian communities for their aesthetic appeal.</li> </ul>	<p>Emphasis (bold) added by GML to the nomination citation.</p> <ul style="list-style-type: none"> <li>• <b>Public parklands</b> with their broader setting elements that form the basis for the popular presentation of the city as a garden-like city and as a city in the landscape.</li> <li>• <b>Views</b> from Mount Ainslie, Black Mountain, Red Hill and Mt Pleasant along axes and across the Central National Area.</li> <li>• <b>View of the Australian Parliament House</b> as the focal point at the end of a tree-lined boulevard, as seen travelling towards Parliament House along Commonwealth Avenue and Kings Avenue.</li> <li>• <b>Partial, passing views of Lake Burley Griffin</b> are important for their value in establishing the lake as the principal 'ornament' of the city's national area and a key design feature visually linking the north and south sides of the city.</li> </ul>

Heritage Values <sup>32</sup>	Key Attributes <sup>33</sup>
<ul style="list-style-type: none"> <li>• Canberra demonstrates a high degree of creative and technical achievement in town planning, urban design and urban horticulture. Its ensemble of planned city features demonstrating successive twentieth century urban design and planning approaches adds up to a showcase of outstanding value to the nation.</li> <li>• Canberra the Planned National Capital has outstanding heritage values to the nation because of its special association with Australians as the nation’s capital and seat of the federal democracy. Canberra also has a special association for Indigenous Australians as the place where significant progress has been made towards Indigenous rights and reconciliation.</li> <li>• Canberra has outstanding heritage values to the nation because of the place’s special association with the lives and works of Prime Ministers and Governors-General of Australia as a group, and individual town planners Walter Burley Griffin and Marion Mahony Griffin.</li> </ul>	<ul style="list-style-type: none"> <li>• The Griffins’ use of topography in the arrangement of the early city and its <b>layout</b> in accordance with its two principal axes—the Land and Water <b>axes</b>.</li> <li>• The use of <b>geometry</b> in the layout and organisation of the early city.</li> <li>• Inclusion of <b>Lake Burley Griffin</b> as a design element linking the dispersed elements of the city.</li> <li>• The <b>tree lined boulevards</b> of King Edward and King George Terraces, and Commonwealth, Kings and Constitution Avenues with their associated visible terminal axis features.</li> <li>• The deliberate location of showcase buildings addressing the Land and Water axes.</li> <li>• City ‘ornaments’ including the Captain Cook Jet, the Carillon and night lighting display in the Parliamentary Triangle and along the water edge of Lake Burley Griffin.</li> <li>• Planned nature of the city—its <b>design and plantings</b>.</li> <li>• The compact layout of the early city reflecting public transport considerations. The <b>1925 gazetted road layout</b> indicates the size and layout of the early city.</li> <li>• <b>Central National Area</b>, including Lake Burley Griffin and <b>high proportion of tree planting</b> in the public domain.</li> </ul> <p>Figure 4.2 shows the boundaries of the heritage nominated area. No HMP has been prepared for Canberra the Planned National Capital.</p>

National Land Roads was nominated to the CHL, however in 2018 the status was changed to ‘Nomination now ineligible for PPAL’. Under the EPBC Act, the AHC can only assess places for the CHL if the places are on the AHC's assessment work plan, which is set each financial year. A nomination becomes ineligible if it has been considered for two consecutive work plans but not included. A nominated place ruled ineligible in this way can be re-nominated, thereupon becoming eligible again for consideration. The following table outlines the heritage values, attributes and management policies for the place, as the identified values still warrant consideration.

## National Road Lands

Heritage Values <sup>34</sup>	Key Attributes <sup>35</sup>	Management Policies
<ul style="list-style-type: none"> <li>Commonwealth Avenue is significant as an integral and major part of Walter Burley Griffin’s 1911 plan for the national capital, and its realisation is associated with the evolution of the cultural landscape of the nation’s capital.</li> <li>Commonwealth Avenue is one of the three major avenues defining the edges of the National Triangle and the initial design of the national capital is a highly significant part of Australia’s and Canberra’s history.</li> <li>Commonwealth Avenue is significant, being relatively rare as an original and major part of Griffin’s design, representing one side of his planned National Triangle.</li> <li>Commonwealth Avenue helps to demonstrate the planning of a national capital, which is an uncommon aspect of Australia’s cultural history.</li> <li>The cultural landscape of the national capital, including Commonwealth Avenue, is significant from a research aspect in providing, through an examination of records and landscape elements, information and an understanding of the landscaping of the capital’s cultural landscape.</li> <li>Commonwealth Avenue is significant as a good example of an important type of</li> </ul>	<p>Attributes that embody the heritage values of Commonwealth and Kings Avenues have not been formally specified. The following relevant attributes have been distilled from the heritage values. Emphasis (bold) added by GML to the National Road Lands nomination citation.</p> <ul style="list-style-type: none"> <li>Commonwealth Avenue overall—<b>wide tree-lined avenue</b>.</li> <li><b>Formality</b> in the design and aesthetic of Commonwealth Avenue.</li> <li>The <b>siting, alignment and width</b> of Commonwealth Avenue.</li> <li><b>Plantings</b>—layout and mix of native and exotic species.</li> <li>Historical <b>function</b> as a major and active boulevard that facilitates public movement throughout Canberra.</li> <li><b>Views north and south</b> along Commonwealth Avenue.</li> <li>The <b>visual and spatial relationship</b> of Commonwealth Avenue with Kings and Constitution Avenues—the other two sides of the National Triangle.</li> <li>Ceremonial and symbolic importance as an entrance to the Parliamentary Zone and integral link connecting the Federal and Territory functions of Canberra.</li> </ul>	<p>No HMP has been prepared for the National Land Roads.</p> <p>Since April 2020, GML has provided a series of ‘heritage principles’ to guide development that is appropriate to the heritage values of Commonwealth Avenue as part of the development of a Commonwealth Avenue Landscape Masterplan. Principles relevant to this project have been provided.</p> <ul style="list-style-type: none"> <li>Retain and enhance the <b>formality</b> of Commonwealth Avenue through appropriate design, aesthetic, scale and materials.</li> <li>Retain Commonwealth Avenue as a wide <b>tree-lined boulevard</b>.</li> <li>Retain and enhance the <b>landscaped character</b>.</li> <li>Maintain and support Commonwealth Avenue’s function as a <b>major and active boulevard</b> within Canberra.</li> <li>Retain and enhance ready <b>public access</b>.</li> <li>Retain significant <b>views and vistas</b>.</li> <li>Any new structures along Commonwealth Avenue should be <b>high quality</b>, with <b>durable</b></li> </ul>

Heritage Values <sup>34</sup>	Key Attributes <sup>35</sup>	Management Policies
<p>landscape—wide tree-lined avenues—which is an important feature in Canberra’s planning and landscape.</p> <ul style="list-style-type: none"> <li>• Commonwealth Avenue is significant as a major part of a landscape/urban design that represented a paradigm shift in urban planning in Australia.</li> <li>• Commonwealth Avenue is an integral part of the designed national capital, acclaimed for its design excellence, which is of importance in the history of Australia and its capital city.</li> <li>• Commonwealth Avenue has special associations with Walter Burley Griffin and Charles Weston, both persons of importance in Australia’s cultural history.</li> </ul>		<p>materials and finishes in <b>sympathetic</b> and <b>neutral</b> colours.</p>

## 4.2.3 ACT Heritage Places

### City Hill

Heritage Values <sup>36</sup>	Management Policies <sup>37</sup>	Images
<p>Emphasis (bold) added by GML to the ACT Heritage Register citation.</p> <p><b>Statement of Significance:</b></p> <p>City Hill represents an important element of urban design and is an integral component of the Griffin plan. It is a <b>generating point</b> for the major avenues of Civic and its plantings provide <b>visual corridors</b> for those avenues.</p> <p>Aesthetically, City Hill provides an important <b>landscaped open space</b> within the Central Business District and enables <b>views of the key topographical elements</b> of the city to be seen from the hill.</p> <p>The verticality created by the trees and flagpole forms a <b>landmark</b> for the city.</p> <p>Plantings have historical significance due to their association with Thomas Charles Weston, Superintendent of Parks and Gardens.</p> <p>City Hill is also of local historical significance because of its</p>	<p>A CMP has not been prepared for City Hill.</p> <p>The following heritage guidelines are provided by the ACT Heritage Register citation:</p> <ul style="list-style-type: none"> <li>• The landscape qualities of City Hill are to be retained as an important element of Canberra’s planning.</li> <li>• The integrity of the plantings is to be retained by replacing all dead and damaged trees with the same species after thorough research of the original design.</li> <li>• Access to City Hill by pedestrians is encouraged.</li> <li>• Any proposals to alter any aspect of City Hill shall be referred to the Heritage Council of the ACT for comment prior to detailed planning and commencement works.</li> </ul>	 <p>Figure 4.5 View from Northbourne Avenue toward City Hill demonstrating its verticality and importance as a generating point for the avenue. (Source: GML 2020)</p>

**Heritage Values<sup>36</sup>**

association with the first visit of a reigning British monarch to Canberra.

**Features Intrinsic**

- All grassed areas.
- Six axial plantings of *Cupressus sempervirens* 'Stricta'.
- Eleven oval shaped groups of *Cupressus sempervirens* 'Stricta'.
- All groups of *Pinus radiata* between the axial plantings.
- Plantings of *Robinia pseudoacacia*.
- The metal flagpole in its existing location.

**Management Policies<sup>37</sup>**

**Images**



Figure 4.6 Aerial of City Hill showing the strongly symmetrical layout of the plantings. (Source: Nearmap 2020)



Figure 4.7 View south on City Hill toward the Central flagpole. (Source: GML 2020)



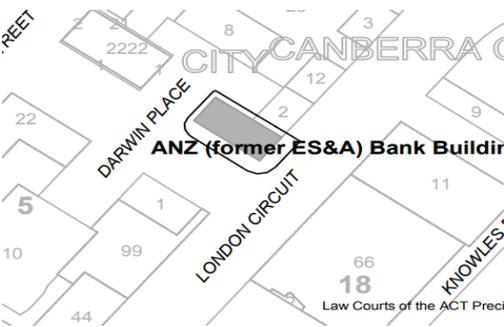
## Melbourne and Sydney Buildings

Heritage Values <sup>38</sup>	Management Policies <sup>39</sup>	Images
<p>Emphasis (bold) added by GML to the ACT Heritage Register citation.</p> <p><b>Statement of Significance:</b></p> <p>The buildings are good examples of the <b>Inter-War Mediterranean</b> style, displaying key features of the style such as light-coloured smooth walling, medium pitch roofs of Roman pattern tiles, round arches, <b>arcaded loggias</b> and <b>formal entrance treatments</b>.</p> <p>The Melbourne and Sydney Buildings were the earliest major developments in Civic, and are commercial buildings, associated with the early development of Canberra. The buildings were based on design principles set by prominent architect, J S Sulman and the design work was finalised by J H Kirkpatrick. The buildings have been the model to establish the colonnade principle which is now an important element throughout Civic. The Melbourne and Sydney Buildings have played and continue to play a role as <b>landmarks</b> in Civic.</p> <p>They provided a focus in establishing the early character and scale of the city’s retail and business area, and they dominated development in Civic from the 1920s until the late 1950s.</p>	<p>The Sydney and Melbourne Buildings CMP 2022 provides the following conservation policies relevant to the Project:</p> <p><b>Policy 18—Conserve Intrinsic Features</b></p> <p>The Intrinsic Features of the Sydney and Melbourne Buildings must be conserved, managed and interpreted in accordance with the principles of the Burra Charter Principles and Practice Notes and the Heritage Act 2004.</p> <p><b>Policy 26—Colonnade Pavement</b></p> <p>Removal of the existing unsympathetic tile and asphalt toppings over the original concrete paving is strongly encouraged. A trial removal shall be carried out to determine the impact on the original concrete pavement.</p> <p>The ACT Heritage Council considers that the removal of all previous unsympathetic toppings can be carried out under this CMP without further advice or approval.</p> <p>All remaining concrete paving must be retained, regardless of condition. A SHE would be required if original material were to be removed.</p> <p>The ACT Heritage Council proposes the installation of large format pavers of Artisan ‘Platina’ limestone as a new pavement</p>	 <p>Figure 4.8 View east along London Circuit toward the Sydney and Melbourne buildings (left). (Source: GML 2020)</p>  <p>Figure 4.9 View north toward the Sydney and Melbourne Buildings. (Source: GML 2020)</p>

Heritage Values <sup>38</sup>	Management Policies <sup>39</sup>	Images
<p>The Melbourne and Sydney Buildings’ design and details exhibit particular <b>aesthetic characteristics</b>, which were inherent in the original design and are valued by the community today.</p> <p>The London Plane trees are rare large specimens of their species in the ACT.</p> <p><b>Features Intrinsic:</b><sup>40</sup></p> <ul style="list-style-type: none"> <li>• <b>Exterior façade</b> of the Melbourne and Sydney Buildings;</li> <li>• remaining original interiors;</li> <li>• central courtyards and remaining internal lightwells; and</li> <li>• London Plane trees (<i>Platanus x acerfolio</i>) in the interior courtyards of both buildings.</li> </ul>	<p>surface, provided that this is laid over the original concrete pavement.</p> <p>The scored lines dividing the original concrete into smaller areas must also be interpreted in any new finish.</p> <p>The step between the colonnade and the street pavement must be maintained where this survives.</p> <p><b>Policy 27—Access Ramps</b></p> <p>The new colonnade paving should be level and not incorporate integral access ramps at individual doorways.</p> <p>The location of access ramps inside the shopfronts is strongly encouraged.</p> <p>Where ramps are proposed within the colonnade they must be of a freestanding removable design and not incorporated as part of the paving.</p>	

Note: The potential impacts to the Melbourne and Sydney Buildings will be assessed in a separate Statement of Heritage Effect that will be included in the Development Application submission by Major Projects Canberra to the relevant ACT Government agencies.

## ANZ Bank Building (former ES&A Bank)

Heritage Values <sup>41</sup>	Management Policies <sup>42</sup>	Images
<p>Emphasis (<b>bold</b>) added by GML to the ACT Heritage Register citation.</p> <p><b>Statement of Significance:</b></p> <p>Designed by bank architect Stuart McIntosh in 1961 for the English Scottish and Australian bank. It demonstrates adoption of the Modern style of architecture in an Australian context.</p> <p>It is an innovative and sophisticated response to the bank as a building type in the 1960s. The design of the building was advanced and technologically innovative for its time.</p> <p>The building occupies a <b>dominant site on a key corner block</b> on London Circuit and University Avenue in Civic. It is part of a precinct of commercial buildings planned as Hobart Place.</p> <p>The building demonstrates the stage in Canberra’s post federal planning history of development of commercial precincts of multi-storey buildings.</p> <p>Potential to contribute to the education of architects/ designers on Late Twentieth Century architectural styles and their adoption.</p>	<p>The ACT Heritage Register provides the following relevant heritage guidelines for conservation of the heritage place:</p> <p><b>Conservation Objective</b>—To conserve the significance of the ANZ Bank Building by retaining the building and the features intrinsic to its heritage features.</p> <p><b>Specific Requirement 1.6:</b> New street furniture, signage and plantings within the frontage and verges addressing London Circuit and University Avenue shall be installed in a manner that does not detract from the significance of the place and shall not detrimentally affect the view of the building from the public domains of London Circuit and University Avenue.</p> <p>The Former ANZ Bank Building CMP 2006 provides the following conservation policies relevant to the Project:</p> <p><b>Conservation Objective 4:</b> To conserve the setting of the building:</p> <p><b>Policy 4.1 The areas adjacent to the building should acknowledge the significance of the building and minimise the adverse impact of any change.</b></p> <ul style="list-style-type: none"> <li>• A footpath is to remain around the building and be of hard paving at or near the current levels.</li> </ul>	 <p>Figure 4.10 View north along London Circuit toward the ANZ building. (Source: GML 2020)</p>  <p>Figure 4.11 Map showing the listed boundary (solid black outline) for the ANZ building. (Source: ACT Heritage Register)</p>

Heritage Values <sup>41</sup>	Management Policies <sup>42</sup>	Images
<p><b>Features Intrinsic<sup>43</sup></b></p> <ul style="list-style-type: none"> <li>• The <b>setting</b> of the place that enables its scale and form to be <b>appreciated from the public domain</b> of London Circuit and University Avenue.</li> <li>• The five-storey <b>scale</b> of the building.</li> <li>• The <b>fabric</b> of the building integral to the original design of Stuart McIntosh.</li> <li>• The <b>external form and detail</b> of the building including sunshades, granite facings and external portico.</li> <li>• The interior form and detail of the building including the 'open well' staircase, the banking chamber and the strong horizontal theme of the building evident in the structural design elements and interior finish details.</li> </ul>	<ul style="list-style-type: none"> <li>• Amendments of levels and subsequent removal of the balustrade on the footpath is permitted.</li> <li>• Street furniture in front of the building should be minimised.</li> <li>• A clear view of the building from University Avenue and London Circuit should be retained.</li> </ul>	

## The Civic Square Precinct

### Heritage Values<sup>44</sup>

Emphasis (bold) added by GML to the ACT Heritage Register citation.

#### Statement of Significance:

The Civic Square Precinct is significant to the ACT for social and cultural values as an important central location and **open space** for public use, celebrations and cultural events and for expressions of democratic freedoms through protest.

It is also significant for its **planning and design...** that put the people ahead of built scale by providing an open contemporary and accessible space for them.

The **framing of the square** by the North and South Buildings designed by Yuncken Freeman and the podium and Canberra Theatre Centre to the west is significant.

#### Features Intrinsic

Emphasis (bold) added by GML.

- **Civic Square Precinct** including open space, the outer square formed by the vertical sides of the buildings, landscaping and amenities that are suitable for passive recreation, water

### Management Policies<sup>45</sup>

The Civic Square Precinct CMP 2009 provides the following conservation policies relevant to the Project:

#### Conservation Policy No. 1: Guiding Conservation Policy

The guiding conservation policy is that the Civic Square precinct shall be conserved and appropriately managed in a manner respecting its cultural significance and the features intrinsic to that heritage significance, and consistent with sympathetic and viable use or uses.

#### Conservation Policy No. 6: Adjacent Civic Development and Theatre Expansion

The Civic Square precinct should continue [and expand] as an 'arts and culture' focus for the city, the relationships between the precinct and the City Hill Park should be strengthened, the Griffin design axes should be retained and reinforced, and new building development should not dominate or over-shadow the Civic Square precinct.

### Images

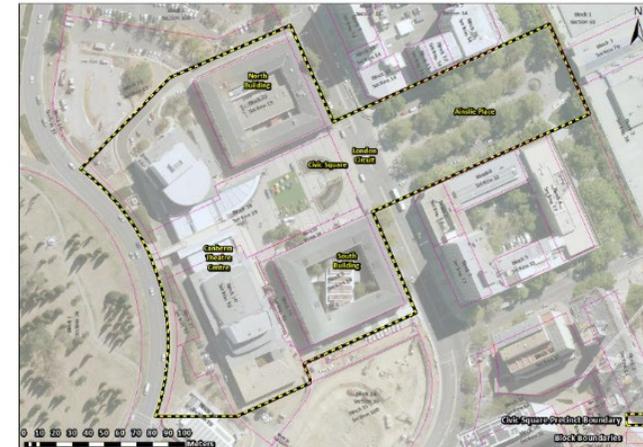


Figure 4.12 Map showing the listed boundary of the Precinct. (Source: ACT Heritage Register)

### Heritage Values<sup>44</sup>

features, hard paving, lighting and steps/large landing looking out over the Square.

- **Ainslie Place** including landscaping and amenities suitable for passive recreation and create a sense of enclosure at a human-scale.
- The original **North and South Buildings; Canberra Theatre Centre**.
- Sculptures and artwork that relate directly to the Civic Square Precinct, civic pride and community use.
- Artwork recognising Ngunnawal connection to the land, and other contributory artworks, sculptures and installations.
- **City Hill—Mount Ainslie** axis as evidenced by symmetry and balance of features on either side of the axis; and maintaining open space along the axis so as not to restrict views and movement along the axis.

### Management Policies<sup>45</sup>

### Images



Figure 4.13 Aerial view of the Civic Square Precinct. (Source: Nearmap 2020)



## Law Courts Precinct

Heritage Values <sup>46</sup>	Management Policies	Images
<p>Emphasis (bold) added by GML to the ACT Heritage Register citation.</p> <p><b>Statement of Significance:</b></p> <p>The precinct is significant as a comparatively rare and successful example of twentieth century civic design incorporating three buildings which differently express the Late Twentieth-Century Stripped Classical style, to a National Capital Development Commission masterplan and control drawings.</p> <p>The contribution of the precinct to Canberra’s townscape is noteworthy and the siting of the buildings gives due prominence especially to the Law Courts which closes the vista along University Avenue at City Hill.</p> <p>The most architecturally significant building in the precinct is the Law Courts of the ACT building, and the Reserve Bank of Australia also has architectural significance, while the City District Police Station is only significant as part of the civic design of the precinct. However, all the buildings contribute to the scale and proportions of the square, and provide unity in use of materials and detailing.</p> <p>Works of art, in the form of sculpture in Knowles Place and the Reserve Bank, add to the aesthetic value of the precinct.</p> <p><b>Features Intrinsic</b></p> <p>Features intrinsic have not been formally specified in the ACT Heritage citation. The following have been distilled from the statement of significance.</p>	<p>No management documents/guidelines have been prepared.</p>	 <p>Figure 4.14 View of Law Courts Precinct paving. (Source: GML 2020)</p>  <p>Figure 4.15 View east from London Circuit toward the Law Courts Precinct. (Source: GML 2020)</p>

## Heritage Values<sup>46</sup>

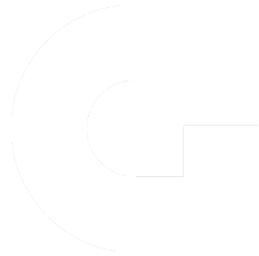
## Management Policies

## Images

- Features of the buildings which demonstrate **Late Twentieth-Century Stripped Classical** style.
- **Siting, scale, materials, detailing and spatial arrangement** of buildings within the Precinct.
- **Vista along University Avenue** terminating with the Law Courts of the Australian Capital Territory building.



Figure 4.16 Map showing the provisionally listed boundary of the Precinct. (Source: ACT Heritage Register)



# Hotel Acton

## Heritage Values<sup>47</sup> Management Policies<sup>48</sup> Images

Emphasis (bold) added by GML to the ACT Heritage Register citation.

### Statement of Significance:

Hotel Acton built in 1927 comprises Blocks A,B,C,E,F & G, the associated courtyards and the nine bay garage, is significant for its association with the early development of the Federal Capital Territory, and in particular as one of the major hostels constructed by government to overcome the acute housing shortage that affected Canberra at that time. The construction of the building set in landscaped gardens, with its subsequent additions, alterations and changed uses closely reflects the economic, political and social circumstances surrounding the design and development of the nation's capital.

Hotel Acton is one of a suite of buildings designed under the Commonwealth Architect John Smith Murdoch for Canberra. It exemplifies the design attributes of the Federal Capital style and is important for its contribution to an understanding of early Canberra architecture. The plan and elevation of the building combine [sic] with the architectural detailing to produce a

The ACT Heritage Register provides the following relevant heritage guidelines for conservation of the heritage place:

- The 1927 blocks (A,B,C,E,F & G) and garages should be conserved. Alterations may be made to the buildings where, in the opinion of the ACT Heritage Council and the Australian Heritage Commission, the proposed works will not adversely affect the significance of the place.
- Demolition should not be permitted, other than in exceptional circumstances, including circumstances in which the building is structurally unsound and beyond economic repair or where there are significant public health and safety reasons to warrant demolition.
- The established landscape character of the place should be retained.
- The open, grassed courts should be retained.
- Construction of new landscape elements in the place should only be permitted where it can be demonstrated to the satisfaction of the Heritage Council and the Australian Heritage Commission, that the new elements do not adversely affect the landscape setting of the place.

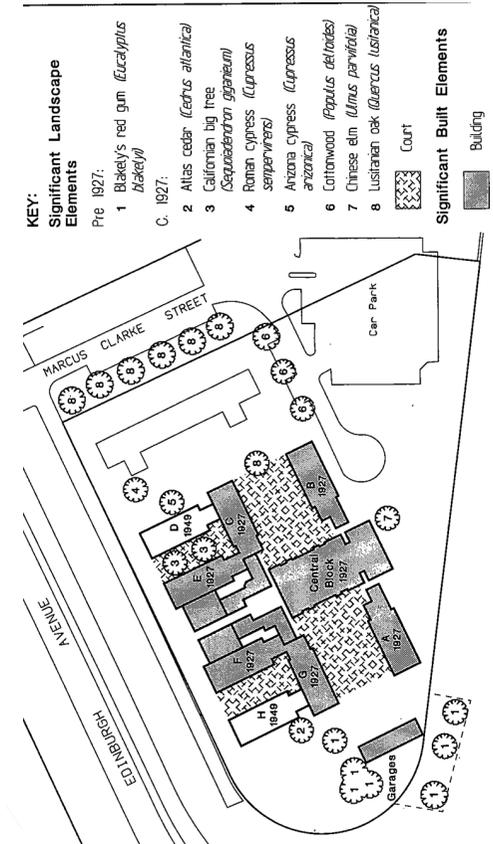
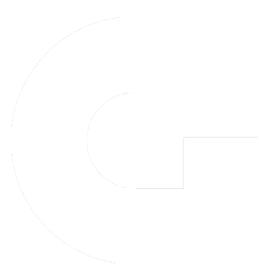


Figure 4.17 Map of significant elements, both built and landscape, of

Heritage Values <sup>47</sup>	Management Policies <sup>48</sup>	Images
<p>building complex of considerable aesthetic appeal. The scale of the building and its articulated roof forms make an important contribution to the urban landscape, which is reinforced by the proximity of stylistically similar buildings, such as Sir Ian Potter House.</p> <p>Landscape elements which enhance the aesthetic values of the place include the open grassed courtyards and the following trees remaining from the original planting: three Cottonwoods, seven Lusitanian oak, two Californian big trees, one Roman cypress, one Arizona cypress, and one Atlas cedar, one smooth barked Chinese elm and seven Blakely’s red gums remnant of pre-settlement woodland.</p> <p>Hotel Acton is significant for having played an important role in the provision of accommodation for a large number of Canberrans from 1927 until 1976. It represents the shared experiences and the community spirit which developed as a result of communal living. As a consequence it is imbued with considerable social value, evidenced by its place in local social documentation.</p> <p><b>Features Intrinsic</b></p> <ul style="list-style-type: none"> <li>• <b>Hotel Acton</b> comprising Blocks A,B,C,E,F &amp; G;</li> </ul>		<p>Hotel Acton. (Source: ACT Heritage Register)</p>

Heritage Values <sup>47</sup>	Management Policies <sup>48</sup>	Images
<ul style="list-style-type: none"> <li>the associated courtyards;</li> <li>the nine bay garage; and</li> <li>the <b>landscape elements</b> comprising three Cottonwoods (<i>Populus deltoides</i>), seven Lusitanian Oak (<i>Quercus lusitanica</i>), two Giant Sequoias (<i>Sequoiadendron giganteum</i>), one Roman Cypress (<i>Cupressus sempervirens</i>), one Arizona Cypress (<i>Cupressus arizonica</i>), and one Atlas Cedar (<i>Cedrus atlanticus</i>), one Smooth-barked Chinese elm (<i>Ulmus parvifolia</i>) and seven Blakely’s Red Gums (<i>Eucalyptus blakelyi</i>).</li> </ul>		



## Ian Potter House

### Heritage Values<sup>49</sup>

Emphasis (bold) added by GML to the ACT Heritage Register citation.

#### Statement of Significance:

Ian Potter House (known until 1985 as Beauchamp House) is historically significant for its associations with the Federal Capital Commission's building program for the transfer of public servants from Melbourne to Canberra in 1927. Together with other hostels built around the same time, it represents an early phase in Canberra's developing social and cultural history. It was originally used to accommodate female public servants, only later being used by both female and male public servants until the early 1970s, when it was also a guesthouse for visitors to Canberra.

The exterior of the building is a significant example of the Inter-War Georgian Revival style of architecture. It was the winning design by Melbourne architects, Anketell and Kingsley Henderson, in a competition held by the Federal Capital Commission to produce ideas for four hostels needed for the growing population of the new Federal Capital. It was the first of four guest houses designed by architects outside the Commission, to provide some variety in the design of the government hostels, most of which had been designed by Commonwealth architect, John Smith Murdoch. It was also the first building of a reinforced concrete structure in Canberra.

The building has associations with Sir Ian Potter, a highly respected entrepreneur and philanthropist.

#### Features Intrinsic

- The **building**, including Fellows Court and Boden Court;
- its **setting**; and
- the wisteria (*Wisteria sinensis*) in Fellows Court.

### Management Policies

The ACT Heritage Register provides the following relevant heritage guidelines for conservation of the heritage place: <sup>50</sup>

#### Requirements relating to setting

- The courtyards of the building shall be maintained and conserved, including the wisteria in Fellows Court

## 4.3 Historical Archaeology

### 4.3.1 Recorded Sites

A search of the ACT Heritage Register for non-Aboriginal archaeological sites within or in the immediate area of the proposed study area returned no site records.

Prior to the construction of the Canberra CBD as it is today, the study area formed part of a sheep station, utilised for agricultural activities. The study area formed part of an area of 2000 acres that was taken out as a ticket of occupation by Joshua John Moore in the 1820s (Figure 4.18 and Figure 4.19). In 1826, Moore sought to purchase 1000 acres of this land and referred to it as 'Canberry' after hearing local Aboriginal names for the area, including 'Kamberra', 'Kghambury', 'Nganbra' and 'Gnabra'.

Moore established a sheep station on his land which was run by an overseer and a number of convict stockmen, as Moore himself remained in Sydney. A number of slab huts and stockyards were constructed on the Acton Peninsula about 800 metres to the southwest of the current study area (Figure 4.18 and Figure 4.19). In 1843, Moore sold his property to Arthur Jeffreys (son in law of Robert Campbell), who constructed the Acton homestead. The Canberry property is marked on early twentieth-century historical parish maps, which show several structures at this location. Acton House was demolished in 1941 to make way for the Canberra Hospital, which is now the location of the National Museum of Australia. The agricultural use of the landscape continued until the establishment of the federal capital in the early twentieth century.



Figure 4.18 1911 survey of the Limestone Plains district by Robert Hoddle showing the

approximate location of the study area in red and the Canberra property in blue. (Source: National Library of Australia Map G8981 G46 1932)



Figure 4.19 1912 parish map of Canberra, county of Murray, showing the approximate location of the study area in red and the 'Canberra' property in blue. (Source: NSW Department of Lands Map G8971)

### 4.3.2 Summary

No historical archaeological sites have been previously recorded within or in the immediate area of the study area. Most of the structures associated with the former sheep station and the Acton homestead were located approximately 800 metres southwest of the current study area, on the Acton Peninsula. Evidence of the historical agricultural use of the study area was likely removed or heavily impacted during the development of the Canberra CBD. Although unlikely, evidence of early agricultural use of the landscape such as remnants of outbuildings, fence posts or agricultural equipment could be present. If evidence is present it would likely be found within a highly disturbed context.

The study area is considered to have low archaeological potential and the proposed action is not anticipated to have an impact on historical archaeological values. As a result, there are no further assessment requirements for historical archaeological sites in relation to the proposed project. If historical archaeological remains were to be unexpectedly encountered, an unanticipated finds protocol should be implemented for the construction works (see Section 6.1.4).

## 4.4 Indigenous Heritage Values

The assessment of the Indigenous heritage values of the study area is outlined in Appendix A. The study area was found to have low potential for the likely existence of Aboriginal archaeological sites. It was confirmed as being within a landscape of cultural significance to the Aboriginal community, but it was found that the proposed project would not affect those values any more than the development of Canberra has already impacted those values. The following summary is drawn from the assessment found in Appendix A.

Within the wider region, the Project area is situated between Black Mountain (approximately 2 kilometres to the west), Mount Ainslie (approximately 2.6 kilometres to the northeast) and Mount Pleasant (approximately 2.7 kilometres to the southwest). Aboriginal heritage sites—including campsites, and ceremonial grounds—have been recorded within the vicinity of these landscape features, as well as at the Australian National University around Sullivans Creek, on Acton Ridge and on the banks of parts of the Molonglo River prior to the establishment of Lake Burley Griffin. These landscape features were key focal points of Aboriginal occupation and have previously been identified as significant Aboriginal places.

The current study area has been assessed as part of previous studies for the Capital Metro, ACT Light Rail Russell Extension project prepared by GML in 2015<sup>51</sup> and an Aboriginal Heritage Desktop Study undertaken for the Canberra Light Rail Stage Two Project, prepared by RPS Group (RPS) in 2018.<sup>52</sup> These projects assessed wider impact areas, which included the current study area and to the east towards Russell, as well as to the south towards Woden. Previous studies have identified areas of archaeological potential including the area around Capitol Hill, the Aboriginal Tent Embassy and within landscapes along the Molonglo River that have now been submerged. No previously recorded sites or areas of archaeological potential have been identified within the current study area.

The study area has been disturbed by the construction of roads and buildings and the installation of utilities. It is considered that, due to this disturbance, the potential for archaeological sites to occur would be low.

Consultation with the Aboriginal community—Ngunnawal and Ngambri representatives—has confirmed that the general landscape was, and continues to be, of significance to them—they have not ceded sovereignty to the lands in the ACT region. The Ngunnawal people are widely recognised by the ACT Government as the Aboriginal occupants of the land, while the Ngambri people maintain that their traditional occupation of this area is attested to in the adaptation of the name Canberra from the word Kamberri, which in itself was derived from Ngambri.

The cultural values of the study area have been impacted by past activities but endure beyond the development of Canberra. The current project work does not impact those values any more than they have already been affected.

No further assessment is required for the Indigenous heritage values. If Aboriginal archaeological remains were to be unexpectedly encountered, an unanticipated finds protocol should be implemented for the construction works (refer to Section 6.1).

## 4.5 Natural Heritage Values

Appendix B contains a Vegetation and Natural Heritage Study on the development of the study area's landscape. The study concludes that there are no vegetation communities or individual flora species with natural heritage value within the study area. All native tree species have been planted and the surviving grassed areas comprise mixed native and exotic grasses where the underlying soils are highly modified and disturbed, lacking characteristic properties associated with natural landscapes.

The Golden Sun Moth is listed as vulnerable under the EPBC Act and, therefore, is a matter of national environmental significance (MNES). MNES matters can be indicators of natural heritage value; however, they do not automatically constitute natural heritage against Commonwealth Heritage criteria.

Despite the lack of natural grassland community, the Golden Sun Moth has been recorded in a number of surveys in the grassed areas of Vernon Circle, the clover leaf open areas and Parkes Way median strip. As a result, it is concluded that the persistent occurrence of the Golden Sun Moth in the grassed areas, coinciding with some of the potential construction support and works compound sites for the light rail project construction, is of natural heritage value—although of lower comparative value than areas where the biodiversity of natural temperate grasslands, including Golden Sun Moths, is intact.

Additional information on the occurrence, potential impact and mitigation measures relevant to the Golden Sun Moth has been explored in detail within the EPBC Act Preliminary Documentation report, prepared by Arup (9 June 2020). This information should be referred to for further discussion on the potential impact of the study area on potential natural heritage values. No further discussion is provided within this HIA.

## 4.6 Endnotes

- <sup>18</sup> Department of Agriculture, Water and the Environment, Australian Heritage Database, 'Parliament House Vista, Anzac Pde, Parkes, ACT, Australia', viewed 23 June 2020 <[http://www.environment.gov.au/cgi-bin/ahdb/search.pl?mode=place\\_detail;place\\_id=105230](http://www.environment.gov.au/cgi-bin/ahdb/search.pl?mode=place_detail;place_id=105230)>.
- <sup>19</sup> Department of Agriculture, Water and the Environment, Australian Heritage Database, 'Parliament House Vista, Anzac Pde, Parkes, ACT, Australia', viewed 23 June 2020 <[http://www.environment.gov.au/cgi-bin/ahdb/search.pl?mode=place\\_detail;place\\_id=105230](http://www.environment.gov.au/cgi-bin/ahdb/search.pl?mode=place_detail;place_id=105230)>.
- <sup>20</sup> Godden Mackay Logan, Lake Burley Griffin—Heritage Assessment, report prepared for the National Capital Authority, May 2010.
- <sup>21</sup> Department of Agriculture, Water and the Environment, Australian Heritage Database, 'Parliament House Vista, Anzac Pde, Parkes, ACT, Australia', viewed 23 June 2020 <<http://www.environment.gov.au/cgi-bin/ahdb/search.pl>>.
- <sup>22</sup> Department of Agriculture, Water and the Environment, Australian Heritage Database, 'Parliament House Vista, Anzac Pde, Parkes, ACT, Australia', viewed 23 June 2020 <<http://www.environment.gov.au/cgi-bin/ahdb/search.pl>>.
- <sup>23</sup> Duncan Marshall et al 2010, Parliament House Vista Area Heritage Management Plan, prepared for the National Capital Authority.
- <sup>24</sup> Department of Agriculture, Water and the Environment, Australian Heritage Database, 'Reserve Bank of Australia, 20-22 London Cct, Canberra, ACT, Australia', viewed 23 June 2020 <<http://www.environment.gov.au/cgi-bin/ahdb/search.pl>>.
- <sup>25</sup> Department of Agriculture, Water and the Environment, Australian Heritage Database, 'Reserve Bank of Australia, 20-22 London Cct, Canberra, ACT, Australia', viewed 23 June 2020 <<http://www.environment.gov.au/cgi-bin/ahdb/search.pl>>.
- <sup>26</sup> Eric Martin and Associates 'Reserve Bank of Australia (Canberra Branch) Heritage Management Plan', prepared for the Reserve Bank of Australia, 2019.
- <sup>27</sup> Department of Agriculture, Water and the Environment, Australian Heritage Database, 'Australian Academy of Science Building, Gordon Street, Canberra City, ACT, Australia', viewed 23 June 2020 <<http://www.environment.gov.au/cgi-bin/ahdb/search.pl>>.
- <sup>28</sup> Department of Agriculture, Water and the Environment, Australian Heritage Database, 'Australian Academy of Science Building, Gordon Street, Canberra City, ACT, Australia', viewed 23 June 2020 <<http://www.environment.gov.au/cgi-bin/ahdb/search.pl>>.
- <sup>29</sup> Eric Martin and Associates, 'Shine Dome Heritage Management Plan', prepared for the Australian Academy of Science, 2018.
- <sup>30</sup> Minister for the Environment, 8 April 2022 'Statement of Reasons: Decision under section 324JJ Environment Protection and Biodiversity Conservation Act 1999: Canberra the Planned National Capital', accessed 17 May 2022 <[http://www.environment.gov.au/heritage/laws/publicdocuments/pubs/106074\\_decision\\_statement\\_20220408.pdf](http://www.environment.gov.au/heritage/laws/publicdocuments/pubs/106074_decision_statement_20220408.pdf)>.
- <sup>31</sup> Minister for the Environment, 8 April 2022 'Statement of Reasons: Decision under section 324JJ Environment Protection and Biodiversity Conservation Act 1999: Canberra the Planned National Capital', accessed 17 May 2022 <[http://www.environment.gov.au/heritage/laws/publicdocuments/pubs/106074\\_decision\\_statement\\_20220408.pdf](http://www.environment.gov.au/heritage/laws/publicdocuments/pubs/106074_decision_statement_20220408.pdf)>.

- <sup>32</sup> Department of Climate Change, Energy, the Environment and Water, Australian Heritage Database, 'Canberra - Central National Area and Inner Hills/ Canberra the Planned National Capital' viewed 17 November 2022 <[http://www.environment.gov.au/cgi-bin/ahdb/search.pl?mode=place\\_detail;place\\_id=106100](http://www.environment.gov.au/cgi-bin/ahdb/search.pl?mode=place_detail;place_id=106100)>.
- <sup>33</sup> Department of Climate Change, Energy, the Environment and Water, Australian Heritage Database, 'Canberra - Central National Area and Inner Hills/ Canberra the Planned National Capital' viewed 17 November 2022 <[http://www.environment.gov.au/cgi-bin/ahdb/search.pl?mode=place\\_detail;place\\_id=106100](http://www.environment.gov.au/cgi-bin/ahdb/search.pl?mode=place_detail;place_id=106100)>.
- <sup>34</sup> Department of Agriculture, Water and the Environment, Australian Heritage Database, 'National Land Roads, Commonwealth Ave, Parkes, ACT, Australia', viewed 23 June 2020 <<http://www.environment.gov.au/cgi-bin/ahdb/search.pl>>.
- <sup>35</sup> Department of Agriculture, Water and the Environment, Australian Heritage Database, 'National Land Roads, Commonwealth Ave, Parkes, ACT, Australia', viewed 23 June 2020 <<http://www.environment.gov.au/cgi-bin/ahdb/search.pl>>.
- <sup>36</sup> Environment, Planning and Sustainable Development Directorate—Environment, ACT Heritage Register, 'City Hill', viewed 12 December 2019 <[https://www.environment.act.gov.au/heritage/heritage\\_register/register-by-place](https://www.environment.act.gov.au/heritage/heritage_register/register-by-place)>.
- <sup>37</sup> Environment, Planning and Sustainable Development Directorate—Environment, ACT Heritage Register, 'City Hill', viewed 12 December 2019 <[https://www.environment.act.gov.au/heritage/heritage\\_register/register-by-place](https://www.environment.act.gov.au/heritage/heritage_register/register-by-place)>.
- <sup>38</sup> Environment, Planning and Sustainable Development Directorate—Environment, ACT Heritage Register, 'Melbourne and Sydney Buildings', viewed 12 December 2019 <[https://www.environment.act.gov.au/heritage/heritage\\_register/register-by-place](https://www.environment.act.gov.au/heritage/heritage_register/register-by-place)>.
- <sup>39</sup> Philip Leeson Architects 'Sydney and Melbourne Buildings Conservation Management Plan', prepared for the ACT Government, 2022.
- <sup>40</sup> Environment, Planning and Sustainable Development Directorate—Environment, ACT Heritage Register, 'Melbourne and Sydney Buildings', viewed 12 December 2019 <[https://www.environment.act.gov.au/heritage/heritage\\_register/register-by-place](https://www.environment.act.gov.au/heritage/heritage_register/register-by-place)>.
- <sup>41</sup> Environment, Planning and Sustainable Development Directorate—Environment, ACT Heritage Register, 'ANZ Bank Building (former ES&A Bank)', viewed 12 December 2019 <[https://www.environment.act.gov.au/heritage/heritage\\_register/register-by-place](https://www.environment.act.gov.au/heritage/heritage_register/register-by-place)>.
- <sup>42</sup> Environment, Planning and Sustainable Development Directorate—Environment, ACT Heritage Register, 'ANZ Bank Building (former ES&A Bank)', viewed 12 December 2019 <[https://www.environment.act.gov.au/heritage/heritage\\_register/register-by-place](https://www.environment.act.gov.au/heritage/heritage_register/register-by-place)>.
- <sup>43</sup> Environment, Planning and Sustainable Development Directorate—Environment, ACT Heritage Register, 'ANZ Bank Building (former ES&A Bank)', viewed 12 December 2019 <[https://www.environment.act.gov.au/heritage/heritage\\_register/register-by-place](https://www.environment.act.gov.au/heritage/heritage_register/register-by-place)>.
- <sup>44</sup> Environment, Planning and Sustainable Development Directorate—Environment, ACT Heritage Register, 'Civic Square Precinct', viewed 17 November 2022 <[https://www.environment.act.gov.au/heritage/heritage\\_register/register-by-place](https://www.environment.act.gov.au/heritage/heritage_register/register-by-place)>.
- <sup>45</sup> Peter Freeman Pty Ltd — The Civic Square Precinct Conservation Management Plan, prepared for ACT Procurement Solutions, 2009.
- <sup>46</sup> Environment, Planning and Sustainable Development Directorate—Environment, ACT Heritage Register, 'Civic Square Precinct', viewed 12 December 2019 <[https://www.environment.act.gov.au/heritage/heritage\\_register/register-by-place](https://www.environment.act.gov.au/heritage/heritage_register/register-by-place)>.

- <sup>47</sup> Environment, Planning and Sustainable Development Directorate—Environment, ACT Heritage Register, 'Hotel Acton', viewed 23 June 2020  
<[https://www.environment.act.gov.au/heritage/heritage\\_register/register-by-place](https://www.environment.act.gov.au/heritage/heritage_register/register-by-place)>.
- <sup>48</sup> Environment, Planning and Sustainable Development Directorate—Environment, ACT Heritage Register, 'Hotel Acton', viewed 23 June 2020  
<[https://www.environment.act.gov.au/heritage/heritage\\_register/register-by-place](https://www.environment.act.gov.au/heritage/heritage_register/register-by-place)>.
- <sup>49</sup> Environment, Planning and Sustainable Development Directorate—Environment, ACT Heritage Register, 'Ian Potter House', viewed 23 June 2020  
<[https://www.environment.act.gov.au/heritage/heritage\\_register/register-by-place](https://www.environment.act.gov.au/heritage/heritage_register/register-by-place)>.
- <sup>50</sup> Environment, Planning and Sustainable Development Directorate—Environment, ACT Heritage Register, 'Ian Potter House', viewed 23 June 2020  
<[https://www.environment.act.gov.au/heritage/heritage\\_register/register-by-place](https://www.environment.act.gov.au/heritage/heritage_register/register-by-place)>.
- <sup>51</sup> GML Heritage 2015, *Capital Metro, ACT Light Rail-Russell Extension-Heritage Impact Assessment*, report prepared for Parsons Brinckerhoff on behalf of Capital Metro Agency.
- <sup>52</sup> RPS 2018, *Canberra Light Rail Stage 2 Environmental Aboriginal Heritage Study*, report prepared for Transport Canberra and City Services.

# 5 Heritage Impact Assessment



# 5 Heritage Impact Assessment

## 5.1 Introduction

This section outlines the assessment of potential heritage impacts from the proposed action on the historic heritage values of the places located within or immediately adjacent to the study area. A relative level of heritage impact is provided, along with a potential impact analysis and recommendations to reduce/avoid impacts.

As noted in Section 1.1, this HIA has been prepared to inform both Territory and Commonwealth approvals. To meet the requirements of a SHE under the ACT Heritage Act (where 'Statement of Heritage Effect' is the term used to define and manage impacts), Section 5.3 uses 'Heritage Impact Statement' in relation to National and Commonwealth Heritage places and 'Statement of Heritage Effect' for ACT heritage places (refer to Table 5.1 for the methodology).

## 5.2 Methodology for Assessing Heritage Impacts

### 5.2.1 Criteria for Assessing Potential Heritage Impacts

The criteria used for assessing potential heritage impacts or heritage effects of the proposed action are outlined in Table 5.1.

Table 5.1 includes the questions applied to determine the degree of impact, a discussion of the potential impacts, a Statement of Heritage Impact/Statement of Heritage Effect including degree and intensity, and recommendations to reduce or avoid potential impacts.

Summary recommendations to reduce or avoid impacts are included in the following assessments, along with a summary post-recommendation statement of the residual impact. The fully described and expanded recommendations are included in Section 6 and should be read in conjunction with the summary recommendations.

Table 5.1 Methodology for assessing potential heritage impacts.

Heritage Values/ Heritage Significance	Discussion: Potential Impact of Proposed Works	Heritage Statement and Post- Recommendation Statement	Summary Recommendations
<p><b>Summary of heritage values/significance and attributes/features intrinsic.</b></p>	<p>Discussion of potential impacts on the heritage values.</p> <p>An analysis of the direct/indirect, cumulative, temporary/permanent, reversible/irreversible, visual, physical, social, and cultural impacts that may occur as a result of the action is discussed.</p>	<p><b>Heritage Impact:</b> Heritage impact statement.</p> <p><b>Degree and intensity of impacts:</b> The relative level of severity of the potential impacts in terms of scale, intensity, timing, duration and frequency is stated.</p> <p><b>Post-Recommendation Impact Assessment:</b> A statement explaining whether the recommendations provided in the right column and in Section 6 are likely to reduce the potential impact.</p>	<p>Suggested measures which can be explored or introduced to avoid or mitigate impacts are provided.</p> <p>Recommendations numbers in Section 6 are referenced in this table, e.g., Recommendation 1 (R1)— Interpretation Plan, is referred to in this table as 'R1'.</p>

## 5.2.2 Definition of Proposed Works Categories

Due to the large quantity of the works associated with the proposed action, the impact assessment has been divided into two work categories, which are defined in Table 5.2 below.

Table 5.2 Definitions for proposed works—categories used in the discussion of potential impacts in Sections 5.3 and 5.4.

Category of Proposed Works	Definition
<p><b>Construction Works</b></p>	<p>Physical construction activities including plant movement, traffic management, establishment of construction compounds and the installation of construction hoardings.</p>
<p><b>Operational Impacts</b></p>	<p>New or modified infrastructure such as light rail tracks, light rail stops, road works, utility works, public domain works and pedestrian footpaths/crossing modifications.</p>

### 5.2.3 Impact Assessment Terminology

A 'significant impact' is an impact which is important, notable, or of consequence, having regard to its context or intensity. The factors to be considered for determining whether or not an action is likely to have a significant impact depend upon the sensitivity, value, and quality of the environment that is impacted, and upon the intensity, duration and magnitude of the impacts.<sup>53</sup>

The following graded scale of impact has been adopted, using the language from the *EPBC Act Significant Impact Guidelines 1.2* and applied for this impact assessment. The guidelines assist in distinguishing between different relative levels of severity of potential heritage impacts as follows:

- **Severe (Significant)** impacts generally have two or more of the following characteristics: permanent/irreversible; medium–large scale; moderate–high intensity.
- **Moderate** impacts generally have two or more of the following characteristics: medium–long term; small–medium scale; moderate intensity.
- **Minor** impacts generally have two or more of the following characteristics: short term/reversible; small scale/localised; low intensity.

Note: Usually the 'significant' level is the threshold for triggering a referral under the EPBC Act. However, an EPBC referral (EPBC 2019/8582) has already been submitted for the Project and no heritage provisions were determined. This HIA has been prepared to inform appropriate and best practice heritage outcomes for the Project.

### 5.2.4 General Note about Relative Impact Levels for this HIA

The scale of an action and its impacts must be considered when predicting the severity of impacts; generally, a larger-scale action with widespread impacts is more likely to have a significant impact on the heritage values than a smaller-scale action with localised impacts. Considering the scale in conjunction with the intensity and duration or frequency of the impacts is important. Intensity refers to the strength and concentration of potential impacts.

However, the severity of impacts alone does not necessarily indicate a significant (or adverse) impact on the overall heritage values of an individual place, or the contribution the impact could make to the 'whole environment'. The potential impacts of the action must be considered in the context of the heritage values of the whole environment, or the place in which the action will take place. In this case, the proposed activity is predominantly occurring within the Central National Area of Canberra—a place of

heritage value referred to as 'Canberra the Planned National Capital'. The place is associated with the designed historic urban landscape and includes many individual heritage places, which together contribute to the place holistically.

## **5.3 National and Commonwealth Heritage Places**

This section provides an assessment of the potential impacts of the Project against the listed and nominated heritage values of Canberra the Planned National Capital, Lake Burley Griffin, Parliament House Vista, Reserve Bank of Australia, National Land Roads and the Australian Academy of Science Building.

### 5.3.1 Lake Burley Griffin

Heritage Values	Discussion: Potential Impact Analysis of Proposed Works	Heritage Statement and Post-Recommendations Statement	Summary Recommendations
<p>Relevant key heritage values and attributes include:</p> <ul style="list-style-type: none"> <li>presence of the lake in views of and within central Canberra;</li> <li>the lake landscape including its edge treatments, bridges, dam, Captain Cook Water Jet and islands and its relationship to the geometry of Griffin’s Plan;</li> <li>quiet and peaceful qualities;</li> <li>qualities of naturalness;</li> <li>availability of views from publicly accessible locations to the lake; and</li> <li>public access to and use of the lake and foreshores.</li> </ul> <p>Refer to Section 4.2.1 for full details of heritage values/attributes.</p>	<p><b>Construction Works:</b></p> <p>Construction works, including the proposed compounds to be established along the western side of Commonwealth Avenue, may obstruct the ‘presence of the lake in views of and within central Canberra’ and the ‘availability of views from publicly accessible locations to the lake’. This potential visual impact would be temporary, with works limited to the duration of the construction period and hoardings and construction compounds to be removed and made good on completion of construction.</p> <p>Construction works are unlikely to impact the ‘quiet, peaceful and reflective qualities’ of the lake. The noise generated would be comparable to the noise generated by existing traffic and construction that already occurs within the lake’s vicinity.</p> <hr/> <p><b>Operational Impacts:</b></p> <p>Two light rail stops and other elements of vertical infrastructure (i.e., traffic signals) are proposed to be installed along Commonwealth Avenue. The proposed infrastructure may obstruct ‘open views to the water from roads and other public use areas’ as specified by the 2008 HMP Action 1.6.2.</p> <p>To minimise the impact of these new light rail stops (as tested and implemented in the Northbourne Avenue median for Stage 1), the stops have been</p>	<p>Construction works, namely construction compounds and hoardings, are likely to have a <b>minor</b> visual impact on the heritage values of Lake Burley Griffin, with the proposed works being temporary, reversible and low intensity.</p> <hr/> <p><b>Post-Recommendation Impact Assessment:</b> Remains at minor.</p> <hr/> <p>A <b>minor</b> impact on the heritage values of Lake Burley Griffin is likely from the proposed light rail stops and vertical infrastructure along Commonwealth Avenue.</p> <p><b>Post-Recommendation Impact Assessment:</b> Remains at minor.</p>	<p><b>General Recommendations:</b></p> <ul style="list-style-type: none"> <li>R1—Develop and implement an Interpretation Plan to identify and interpret the history and heritage values of Lake Burley Griffin and to engage with the community.</li> <li>R3—Complete an Archival Recording prior to any site disturbance and site establishment.</li> <li>R4—Follow an Unexpected Finds Protocol, refer to Section 6.1.4.</li> </ul> <p><b>Design Development:</b></p> <p>R5—Mitigation measures could include further design development of infrastructure that aims to reduce visual clutter in the significant urban/cultural landscape setting as far as possible.</p> <ul style="list-style-type: none"> <li>R5A/B—Ensure the heritage values of the place/s (noted in this report) are conserved and appropriately managed.</li> </ul>

Heritage Values	Discussion: Potential Impact Analysis of Proposed Works	Heritage Statement and Post-Recommendations Statement	Summary Recommendations
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designed with low, flat rooflines and extensive glazing. The use of an island stop (a single central platform between the rails) rather than two side platforms reduces the number of shelters required.

Other proposed works in the vicinity, such as the installation of new light rail tracks, a light rail bridge over Parkes Way and road works, would be unlikely to have an impact on views or the appreciation of the lake landscape due to their linear nature.

## 5.3.2 Parliament House Vista

Heritage Values	Discussion: Potential Impact Analysis of Proposed Works	Heritage Statement and Post-Recommendations Statement	Summary Recommendations
<p>Relevant key attributes, summarised from citation, includes:</p> <ul style="list-style-type: none"> <li>concentration of buildings, parklands and gardens that support Commonwealth parliamentary and governmental activity and national cultural life;</li> <li>extensive vista along the land axis accentuated by planned open spaces, water features, tree plantings, terminal features, etc;</li> <li>whole of the vista; and</li> <li>planned layout of vista.</li> </ul> <p>Refer to Section 4.2.1 for full details of heritage values/attributes.</p>	<p><b>Construction Works:</b></p> <p>Construction work along Commonwealth Avenue has the potential to introduce new elements or alter existing elements of the vista’s immediate setting. These impacts would be temporary, with works limited to the duration of the construction period and hoardings to be removed on completion of construction.</p> <p>Protection of views to the surrounding forested hills and significant views to and from Parliament House Vista would not be impacted.</p> <hr/> <p><b>Operational Impacts:</b></p> <p>Proposed permanent works along Commonwealth Avenue—including the installation of new dual tracks and two light rail stops—and public domain works and other road modifications would introduce new elements or alter existing elements of the Parliament House Vista’s immediate setting.</p> <p>Changes to the immediate setting of the vista would comprise a minor impact and would not interfere with the ‘underlying geometry of the area nor obstruct significant views to and from the Vista’, which is in accordance with the HMP policies (refer to Section 4.2.1) and</p>	<p>Construction works are likely to have a <b>minor visual</b> impact on the heritage values of the Parliament House Vista.</p> <hr/> <p><b>Post-Recommendation Impact Assessment:</b> Remains at minor.</p> <hr/> <p>New infrastructure and modifications to existing infrastructure are likely to have a <b>minor</b> impact on the heritage values of the Parliament House Vista.</p> <hr/> <p><b>Post-Recommendation Impact Assessment:</b> Remains at minor.</p>	<p><b>General Recommendations:</b></p> <ul style="list-style-type: none"> <li>R1—Develop and implement an Interpretation Plan to identify and interpret the history and heritage values of the Parliament House Vista and to engage with the community.</li> <li>R3—Complete an Archival Recording prior to any site disturbance and site establishment.</li> <li>R4—Follow an Unexpected Finds Protocol, refer to Section 6.1.4.</li> </ul> <p><b>Design Development:</b></p> <p>R5—Mitigation measures could include further design development of infrastructure that aims to reduce visual clutter in the significant urban/cultural landscape setting as far as possible.</p> <ul style="list-style-type: none"> <li>R5A—Reduce the number of light poles/signage/traffic signals.</li> <li>R5B—Ensure light poles/signage/traffic signals are finished in a recessive colour.</li> <li>R5C—Ensure the verges and median of Commonwealth Avenue are retained, where practical.</li> <li>R5D—Reduce the quantity of paving/bitumen to that which is required.</li> </ul>

Heritage Values	Discussion: Potential Impact Analysis of Proposed Works	Heritage Statement and Post-Recommendations Statement	Summary Recommendations
	<p>the Commonwealth Avenue Landscape Masterplan.</p>		<p><b>Landscape Implementation:</b></p> <ul style="list-style-type: none"> <li>• R5—Ensure the heritage values of the place/s (noted in this report) are conserved and appropriately managed.</li> <li>• R2—Ensure the design is consistent with the prepared Light Rail Commonwealth Avenue Masterplan.</li> <li>• R2B—Explore and document alternatives to the removal of trees.</li> <li>• R2C—Where removal and replacement of trees is necessary, plant advanced tree stock of suitable varieties.</li> <li>• R2D—Ensure new plantings are in keeping with the Commonwealth Avenue heritage values and NCA Tree Management Policy.</li> <li>• R2E—Ensure any median planting is complementary and does not obscure the vista.</li> <li>• R2F—Include proposed tree removal/planting works in the Communication Strategy.</li> </ul>

### 5.3.3 Reserve Bank of Australia

Heritage Values	Discussion: Potential Impact Analysis of Proposed Works	Heritage Statement and Post-Recommendations Statement	Summary Recommendations
<p>Relevant key heritage values and attributes include:</p> <ul style="list-style-type: none"> <li>the bank building as a whole (internal and external);</li> <li>demonstration of Stripped Classical style of architecture through typical features such as simple rectangular forms, symmetry and geometric minimalist style of the landscape plaza;</li> <li>the building’s designed and harmonious relationship to the Law Courts Precinct through style, scale, form, colour and materials;</li> <li>visual relationship to the axis of the vista to Black Mountain, along University Avenue; and</li> <li>impression of institutional security.</li> </ul> <p>Refer to Section 4.2.1 for full details of heritage values/attributes.</p>	<p><b>Construction Works:</b></p> <p>Construction works along London Circuit have the potential to obstruct and alter views toward the Reserve Bank from the public domain. This visual impact would be temporary, with activities limited to the duration of the construction period and hoardings to be removed on completion of construction.</p> <hr/> <p><b>Operational Impacts:</b></p> <p>Proposed utility works would involve modification to the existing red-brick paving installed along the western side of the Reserve Bank. In the 2019 HMP, it is noted that the red-brick planter beds existing on the north and west sides of the building are not original and that the red-brick paving was replaced in 2010–2011 as part of drainage upgrade works. Detailed knowledge of when bricks were originally installed is limited.</p> <p>Other infrastructure works proposed in the vicinity of the Reserve Bank, including the new tracks, are unlikely to have an impact on its heritage values. Measures to mitigate impact have been included within the design of the proposal and include:</p> <ul style="list-style-type: none"> <li>utilisation of wire-free tracks, removing the need to install vertical infrastructure to support overhead equipment; and</li> </ul>	<p>Construction works are likely to have a <b>minor</b> impact on the heritage values of the Reserve Bank, with the proposed works being temporary, reversible and low intensity.</p> <hr/> <p><b>Post-Recommendation Impact Assessment:</b> Remains at minor.</p> <hr/> <p>New infrastructure and modifications to existing infrastructure is <b>unlikely</b> to have an impact on the heritage values of the Reserve Bank.</p> <hr/> <p><b>Post-Recommendation Impact Assessment:</b> Remains at minor.</p>	<p><b>General Recommendations:</b></p> <ul style="list-style-type: none"> <li>R1—Develop and implement an Interpretation Plan to identify and interpret the history and heritage values of the Reserve Bank and to engage with the community.</li> <li>R3—Complete an Archival Recording prior to any site disturbance and site establishment.</li> <li>R4—Follow an Unexpected Finds Protocol, refer to Section 6.1.4.</li> </ul> <p><b>Design Development:</b></p> <p>Investigate the original surface treatment to the verge and determine a suitable replacement based on this investigation.</p> <ul style="list-style-type: none"> <li>Refer also to the recommended measures for the Law Courts Precinct (Section 6.2).</li> </ul>

Heritage Values	Discussion: Potential Impact Analysis of Proposed Works	Heritage Statement and Post-Recommendations Statement	Summary Recommendations
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- location of new light rail stop 'Edinburgh Avenue' at a substantial distance from the building.

### 5.3.4 Australian Academy of Science Building

Heritage Values	Discussion: Potential Impact Analysis of Proposed Works	Heritage Statement and Post-Recommendations Statement	Summary Recommendations
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Relevant key heritage values and attributes include:

- freestanding copper clad dome form and structure; and
- clear view to building.

Refer to Section 4.2.1 for full details of heritage values/attributes.

**Construction Works:**

A construction compound is proposed to be established to the north of the Australian Academy of Science Building across Gordon Street. The proposed compound would be physically separated from the heritage place by the width of Gordon Street and is unlikely to obstruct visibility of the heritage place from the public domain.

Construction works along Edinburgh Avenue and Marcus Clarke Street may be visible from the heritage place but are unlikely to impact its heritage values as they would be physically and visually separated from the heritage place by intervening development, plantings and distance.

**Operational Impacts:**

Proposed permanent works are unlikely to impact on the Australian Academy of Science Building as they would be physically and visually separated from the heritage place by intervening development, plantings and distance.

Construction works are **unlikely** to have an adverse impact on the Australian Academy of Science Building.

New infrastructure and modifications to existing infrastructure are **unlikely** to have an adverse impact on the heritage values of the Australian Academy of Science Building.

No mitigation measures are recommended.

No mitigation measures are recommended.

## 5.5 Other Relevant Heritage Places

As discussed at Section 4.2.2, ‘Canberra the Planned National Capital’ was assessed by the AHC as having heritage values which meet the National Heritage criteria of outstanding heritage value to the nation. However, the site was not included in the National Heritage List after other matters were considered. The status of National Land Roads was changed to ‘No longer eligible for PPAL’ and is no longer being considered by the AHC. However, the heritage values identified are relevant for this project.

### 5.5.1 Canberra the Planned National Capital

Heritage Values	Discussion: Potential Impact Analysis of Proposed Works	Heritage Statement and Post-Recommendations Statement	Summary Recommendations
<p>Relevant key attributes include:</p> <ul style="list-style-type: none"> <li>public parklands with their broader setting elements;</li> <li>views from Mount Ainslie, Black Mountain, Red Hill and Mt Pleasant along axes and across the Central National Area;</li> <li>view of the Australian Parliament House as the focal point at the end of a tree-lined boulevard;</li> </ul>	<p><b>Construction Works:</b></p> <p>Temporary construction works could obstruct significant views north and south along Commonwealth Avenue, views toward Lake Burley Griffin and the views across the Central National Area.</p> <p>The visual impacts would be temporary, with works limited to the duration of the construction period and hoardings and construction compounds to be removed and made good on completion of construction.</p>	<p>Construction works are likely to have a <b>minor</b> impact on the heritage values, particularly the significant views and the ability to read the key elements of the Griffins’ formally adopted plan for Canberra.</p> <p>The degree of heritage impact would be <b>minor</b>, as the proposed construction works would be for a relatively short duration and of a low intensity.</p> <hr/> <p><b>Post-Recommendation Impact Assessment:</b> Remains at minor.</p>	<p><b>General Recommendations:</b></p> <ul style="list-style-type: none"> <li>R1—Develop and implement an Interpretation Plan to identify and interpret the history and heritage values of Canberra and to engage with the community.</li> <li>R3—Complete an Archival Recording prior to any site disturbance and site establishment.</li> <li>R4—Follow the Unexpected Finds Protocol, refer to Section 6.1.4.</li> </ul> <p><b>Design Development:</b></p>

Heritage Values	Discussion: Potential Impact Analysis of Proposed Works	Heritage Statement and Post-Recommendations Statement	Summary Recommendations
<ul style="list-style-type: none"> <li>partial, passing views of Lake Burley Griffin;</li> <li>layout in accordance with its two principal axes—the Land and Water axes;</li> <li>the use of geometry in the layout and organisation of the early city;</li> <li>Lake Burley Griffin as a design element linking the dispersed elements of the city;</li> </ul>	<p><b>Operational Impacts:</b></p> <p>The construction of light rail tracks along the median of London Circuit and Commonwealth Avenue would see the introduction of a significant new piece of permanent infrastructure within the roadway, requiring modifications to intersections, verges and installation of associated infrastructure (i.e., traffic signals).</p> <p>The new light rail tracks would physically and visually alter the roadways, particularly the Commonwealth Avenue median, which is a large grassed area devoid of trees. To assist in mitigating impact, wire-free tracks are proposed</p>	<p>New infrastructure and modifications to existing infrastructure are likely to have a <b>moderate</b> impact on the heritage values of ‘Canberra the Planned National Capital’.</p> <p>The degree of heritage impact would be moderate with works being permanent and irreversible; yet of a medium scale and moderate intensity within the context of Canberra the Planned National Capital.</p>	<p>R5—Mitigation measures could include further design development of infrastructure that aims to reduce visual clutter in the significant urban/cultural landscape setting as far as possible.</p> <p>The proposed new bridge over Parkes Way should be designed holistically with the design of the light rail track and passage over Commonwealth Avenue Bridge, and the potential heritage impact also assessed holistically.</p>

Heritage Values	Discussion: Potential Impact Analysis of Proposed Works	Heritage Statement and Post-Recommendations Statement	Summary Recommendations
<ul style="list-style-type: none"> <li>the tree-lined boulevards of Commonwealth, Kings and Constitution Avenues with their associated visible terminal axis features;</li> <li>planned nature of the city—its design and plantings;</li> <li>the 1925 gazetted road layout indicates the size and layout of the early city; and</li> <li>Central National Area and high proportion of tree planting in the public domain.</li> </ul> <p>Refer to Section 4.2.1 for full details of heritage values/attributes.</p>	<p>for the entire length of the route, with green tracks proposed along Commonwealth Avenue.</p> <p>A new light rail bridge is proposed to be installed over Parkes Way between the two existing traffic bridges. Although the bridge would be similar in form and design to the existing road bridges, it would alter the original design by infilling the gap between the existing bridges to create a single surface.</p> <p>The design of the new bridge, and in particular the continuing passage of the light rail and its track over Commonwealth Avenue Bridge, should be considered and designed holistically, with the Commonwealth Avenue Bridge component of the Project.</p>	<p><b>Post-Recommendation Impact Assessment:</b> Remains at moderate.</p>	<ul style="list-style-type: none"> <li>R5B—Ensure light poles/signage/ traffic signals are finished in a recessive colour.</li> <li>R5C—Ensure the verges and median of Commonwealth Avenue are retained, where practical and consistent with the prepared Light Rail Commonwealth Avenue Masterplan.</li> <li>R5D—Reduce the quantity of paving/bitumen to that which is required.</li> </ul> <p><b>Landscape Implementation:</b></p> <p>R2B—Consider retention of historic trees. Explore and document all alternatives to their proposed removal.</p>

Heritage Values	Discussion: Potential Impact Analysis of Proposed Works	Heritage Statement and Post-Recommendations Statement	Summary Recommendations
	<p>The two proposed new light rail stops along the Commonwealth Avenue median would be permanent additions to the median, which is currently devoid of structures. The light rail stops would increase the visual clutter along Commonwealth Avenue, and potentially obstruct significant views north and south. To minimise the impact of these new structures (as tested and implemented in the Northbourne Avenue median for Stage 1), the stops have been designed with low, flat rooflines and extensive glazing. The use of an island stop (a single central platform between the rails) rather than two side platforms reduces the impact it would have on the currently open 'urban' landscape.</p> <p>Permanent removal of early plantings with links to the original Weston landscaping plan for the City Hill Precinct is proposed. Overall, approximately 100 trees are proposed to be removed from within the study area. To assist in mitigating the impact of the removal of key attributes of Canberra the Planned National Capital, approximately 140 new trees are proposed to be planted throughout the study area.</p>		<ul style="list-style-type: none"> <li>• R5—Ensure the heritage values of the places (noted in this report) are conserved and appropriately managed.</li> <li>• R2A—Implement the landscape structure of Commonwealth Avenue, where consistent with the heritage values of the place/s.</li> <li>• R2—Retain historic trees where possible, and explore and document alternatives to the removal of trees.</li> <li>• R2C—Where removal and replacement of trees is necessary, plant advanced tree stock of suitable varieties.</li> <li>• R2D—Ensure new plantings are in keeping with the Commonwealth Avenue heritage values and NCA Tree Management Policy.</li> <li>• R2E—Ensure any median strip planting is complementary and does not obscure the vista.</li> <li>• R2F—Include proposed tree removal/ planting works in the Communication Strategy.</li> </ul>

## 5.5.2 National Land Roads

Heritage Values	Discussion: Potential Impact Analysis of Proposed Works	Heritage Statement and Post-Recommendations Statement	Summary Recommendations
<p>Relevant key heritage values and attributes include:</p> <ul style="list-style-type: none"> <li>• wide, tree-lined avenue;</li> <li>• plantings;</li> <li>• formality of the road due to siting, alignment and width;</li> <li>• historical function as a major and active boulevard that facilitates public movement throughout Canberra;</li> <li>• views north and south along the road alignment of Commonwealth Avenue;</li> <li>• the visual and spatial relationship of Commonwealth Avenue with Kings and Constitution Avenues—the other two sides of the National Triangle; and</li> <li>• ceremonial and symbolic importance to</li> </ul>	<p><b>Construction Works:</b></p> <p>Construction works have the potential to obstruct and alter views north and south along Commonwealth Avenue. This potential visual impact would be temporary, with works limited to the duration of the construction period and hoardings and construction compounds to be removed and made good on completion of construction.</p> <hr/> <p><b>Operational Impacts:</b></p> <p>The construction of light rail tracks along the median of Commonwealth Avenue would see the introduction of a significant new piece of permanent infrastructure within the roadway. At present, the median is a large grassed area that is devoid of trees, with existing infrastructure largely confined to traffic signals and flag poles. The new light rail would physically and visually alter Commonwealth Avenue, potentially detracting from its landscaped character. To assist in mitigating potential impact, ‘green’ and wire-free tracks are proposed.</p> <p>Two new light rail stops are proposed for installation along the Commonwealth Avenue median. The light rail stops would be permanent additions to the median, which is currently devoid of structures, increasing the</p>	<p>Construction works are likely to have a <b>minor</b> visual impact on the heritage values of Commonwealth Avenue, with the proposed works being temporary, reversible and low intensity.</p> <hr/> <p><b>Post-Recommendation Impact Assessment:</b> Remains at minor.</p> <hr/> <p>The proposed new infrastructure and modifications to existing infrastructure, namely the new tracks, light rail stops, intersection works and light rail bridge, are likely to have a <b>moderate</b> impact on the heritage values of Commonwealth Avenue, with the proposed works being long-term, medium scale and moderate intensity.</p> <hr/> <p><b>Post-Recommendation Impact Assessment:</b> Remains at moderate.</p>	<p><b>General Recommendations:</b></p> <ul style="list-style-type: none"> <li>• R1—Develop and implement an Interpretation Plan to identify and interpret the history and heritage values of Canberra and to engage with the community.</li> <li>• R3—Complete an Archival Recording prior to any site disturbance and site establishment.</li> <li>• R4—Follow an Unexpected Finds Protocol, refer to Section 6.1.4.</li> </ul> <p><b>Design Development:</b></p> <p>R5—Mitigation measures could include further design development of infrastructure that aims to reduce visual clutter in the significant urban/cultural landscape setting, as far as possible.</p> <p>The proposed new bridge over Parkes Way should be designed holistically with the design of the light rail track and passage over Commonwealth Avenue Bridge, with the potential heritage impact also assessed holistically.</p> <ul style="list-style-type: none"> <li>• R5A—Reduce the number of light poles/signage/traffic signals.</li> <li>• R5B—Ensure light poles/signage/traffic signals are finished in a recessive colour.</li> </ul>

Heritage Values	Discussion: Potential Impact Analysis of Proposed Works	Heritage Statement and Post-Recommendations Statement	Summary Recommendations
<p>Canberra, the national capital.</p> <p>Refer to Section 4.2.1 for full details of heritage values/attributes.</p>	<p>visual clutter along Commonwealth Avenue, and would potentially obstruct significant views north and south. To minimise the impact of these new structures (as tested and implemented in the Northbourne Avenue median for Stage 1), the stops have been designed with low, flat rooflines and extensive glazing. The use of an island stop (a single central platform between the rails) rather than two side platforms reduces the impact it would have on the currently open ‘urban’ landscape.</p> <p>New trees are proposed to be located along the verge (three on either side) adjacent to the new City South stop. The proposal would support the general presentation of Commonwealth Avenue as a ‘wide tree-lined avenue’.</p> <p>A new light rail bridge is proposed to be installed over Parkes Way between the two existing road bridges. Although the bridge would be similar in form and design to the existing road bridges, it would alter the original design by infilling the gap between the existing bridges to create a single surface.</p> <p>The design of the new bridge, and the continuing passage of light rail and its track over Commonwealth Avenue Bridge, should be considered and designed holistically with the Commonwealth Avenue Bridge component of the Project. The level and</p>		<ul style="list-style-type: none"> <li>• R5C—Ensure the verges and median strip of Commonwealth Avenue are retained, where practical.</li> <li>• R5D—Reduce the quantity of paving/bitumen to that which is required.</li> </ul> <p><b>Retain the Landscape Character:</b></p> <ul style="list-style-type: none"> <li>• R5—Ensure the heritage values of the place/s (noted in this report) are conserved and appropriately managed.</li> <li>• R2A—Implement the landscape structure of Commonwealth Avenue, where consistent with the heritage values of the place/s.</li> <li>• R2B—Explore and document alternatives to the removal of trees.</li> <li>• R2C—Where removal and replacement of trees is necessary, plant advanced tree stock of suitable varieties.</li> <li>• R2D—Align new plantings with the Commonwealth Avenue heritage values and NCA Tree Management Policy.</li> <li>• R2E—Ensure any median strip planting is complementary and does not obscure the vista.</li> <li>• R2F—Include proposed tree removal/planting works in the Communication Strategy.</li> </ul>

Heritage Values	Discussion: Potential Impact Analysis of Proposed Works	Heritage Statement and Post-Recommendations Statement	Summary Recommendations
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degree of impact may change as the design develops.

## 5.6 ACT Heritage Places

The following section provides an assessment of the potential impacts of the Project against the listed and nominated heritage significance of the ACT Heritage Place: City Hill, Melbourne and Sydney Buildings, ANZ Bank Building (former ES&A Bank), the Civic Square Precinct, the Law Courts Precinct, Hotel Acton and Ian Potter House.

### 5.6.1 City Hill

Heritage Significance	Discussion: Potential Impact Analysis of Proposed Works	Heritage Statement and Post-Recommendations Statement	Summary Recommendations
<p>Relevant key aspects of heritage significance and features intrinsic include:</p> <ul style="list-style-type: none"> <li>City Hill’s role as a generating point for the major avenues of Civic, with its plantings providing visual corridors for those avenues, and as a historically significant and</li> </ul>	<p><b>Construction Works:</b></p> <p>Construction works have the potential to obstruct and alter views to and from City Hill, impacting its significance as ‘a generating point for the major avenues’ and its aesthetic significance as ‘an important open space’ and providing ‘views of the key topographical elements of the city.’</p> <p>This potential visual impact would be temporary, with works limited to the duration of the construction period, and hoardings and construction compounds</p>	<p>Construction works are likely to have a <b>minor</b> impact on the significance of City Hill, with the proposed works being temporary, reversible and low intensity.</p> <p>The impact is visual, as viewed to City Hill, and as part of the broader landscape setting, rather than an impact on the intrinsic features, within the</p>	<p><b>General Recommendations:</b></p> <ul style="list-style-type: none"> <li>R1—Develop and implement an Interpretation Plan to identify and interpret the history and heritage values of City Hill and to engage with the community.</li> </ul>

Heritage Significance	Discussion: Potential Impact Analysis of Proposed Works	Heritage Statement and Post-Recommendations Statement	Summary Recommendations
<p>enduring component of the Griffin Plan;</p> <ul style="list-style-type: none"> <li>the important historical and aesthetic landscaped open space City Hill provides within the Central Business District, enabling views of the key topographical elements of the city to be seen from the hill;</li> <li>the verticality created by the trees and flagpole forms a landmark for the city;</li> <li>all grassed areas;</li> <li>cultural plantings (<i>Cupressus sempervirens</i>, <i>Pinus radiata</i> and <i>Robinia pseudoacacia</i>); and</li> <li>central flagpole and in its existing location.</li> </ul> <p>Refer to Section 4.2.3 for full details of heritage significance/features intrinsic.</p>	<p>being removed and made good on completion of construction.</p> <p><b>Operational Impacts:</b></p> <p>The new light rail stops are proposed along the median strip of Commonwealth Avenue, which have the potential to diminish/obstruct views to and from City Hill. The stops would introduce new built elements where there currently are none and the existing 'urban' landscape/environment is open and always has been.</p> <p>To minimise the impact of these new structures (as tested and implemented in the Northbourne Avenue median for Stage 1), the stops have been designed with low, flat rooflines and extensive glazing. The use of an island stop (a single central platform between the rails) rather than two side platforms reduces the impact it would have on the currently open 'urban' landscape.</p> <p>Associated light rail stop infrastructure, including traffic signals and pedestrian crossings, that would be required on Commonwealth Avenue would have a potential impact from the increased visual clutter within the vista along Commonwealth Avenue to and from City Hill.</p> <p>Other infrastructure works proposed in the vicinity of City Hill, such as the new light rail tracks, an infill bridge over Parkes Way, and tree removal/planting, are unlikely to have an impact on the heritage significance of City Hill. Measures to mitigate impact</p>	<p>ACT Heritage place boundary of City Hill.</p> <hr/> <p><b>Post-Recommendation Impact Assessment:</b> Remains at minor.</p> <hr/> <p>The proposed light rail stops, and other vertical infrastructure, are likely to have a <b>minor</b> impact on views to and from City Hill along Commonwealth Avenue. The infrastructure for the stop would be long-term, yet small-scale and low intensity.</p> <p>The impact is visual, as viewed to City Hill, and as part of the broader landscape setting, rather than an impact on the intrinsic features, within the ACT Heritage place boundary of City Hill.</p> <hr/> <p><b>Post-Recommendation Impact Assessment:</b> Remains at minor.</p>	<ul style="list-style-type: none"> <li>R3—Complete an Archival Recording prior to any site disturbance and site establishment.</li> <li>R4—Follow an Unexpected Finds Protocol, refer to Section 6.1.4.</li> </ul> <p><b>Design Development:</b></p> <p>R5—Mitigation measures could include further design development of infrastructure that aims to reduce visual clutter in the significant urban/cultural landscape setting, as far as possible.</p>

Heritage Significance	Discussion: Potential Impact Analysis of Proposed Works	Heritage Statement and Post-Recommendations Statement	Summary Recommendations
	<p>have been included within the design of the proposal and include:</p> <ul style="list-style-type: none"> <li>• utilisation of wire-free tracks, removing the need to install vertical infrastructure to support overhead equipment;</li> <li>• use of green tracks along Commonwealth Avenue, allowing for the landscaped character of the Commonwealth Avenue median to be retained; and</li> <li>• consistency of the new infill bridge of Parkes Way with existing road bridges in terms of appearance, form, structure and finish.</li> </ul>		

## 5.6.2 Melbourne and Sydney Buildings

**Note:** The potential impacts to the intrinsic features of the Melbourne and Sydney Buildings have been assessed in a separate Statement of Heritage Effect that will be included in the Development Application submission by Major Projects Canberra to the relevant ACT Government agencies.

MPC sought advice from ACT Heritage on the SHE process for the proposed works adjacent to the Melbourne Building. ACT Heritage advised that the proposed planting is outside the listed boundary of the building and in accordance with the building’s CMP approved by the ACT Heritage Council. As such, the landscaping concept is supported by ACT Heritage—subject to the use of root barriers for trees.

### 5.6.3 ANZ Building (Former ES&A Bank)

Heritage Significance	Discussion: Potential Impact Analysis of Proposed Works	Heritage Statement and Post-Recommendations Statement	Summary Recommendations
<p>Relevant key aspects of heritage significance and features intrinsic include:</p> <ul style="list-style-type: none"> <li>its dominant site on a key corner block;</li> <li>setting and appreciation of its scale and form from the public domain of London Circuit and University Avenue;</li> <li>five-storey scale;</li> <li>fabric of the building integral to the original design; and</li> <li>external form and detail of the building.</li> </ul> <p>Refer to Section 4.2.3 for full details of heritage significance/features intrinsic.</p>	<p><b>Construction Works:</b></p> <p>Construction works have the potential to detract from the ‘setting and appreciation’ of the ANZ Bank Building from the public domain of London Circuit and University Avenue. This visual impact would be temporary, with activities limited to the duration of the construction period and hoardings to be removed on completion of construction.</p> <p><b>Operational Impacts:</b></p> <p>Modifications to the intersection of London Circuit and University Avenue would involve works to parts of the building’s eastern and southern verges/footpath. Proposed works would include widening of the verge, installation of a new softscape landscaping and new verge finish.</p> <p>In accordance with CMP Policy 4.1 (refer to Section <b>4.2.3</b>), the proposed works would retain a hard-paved footpath around the building. However, the new softscape may detract from ‘a clear view of the building from University Avenue’.</p> <p>Other infrastructure works proposed in the vicinity of the ANZ Building, including the new tracks, are unlikely to have an impact on the significance of the ANZ Building or the ability to appreciate its scale and form from</p>	<p>Construction works are likely to have a <b>minor</b> visual impact to the significance of the ANZ Bank Building, with the proposed works being temporary, reversible and low intensity.</p> <hr/> <p><b>Post-Recommendation Impact Assessment:</b> Remains at minor.</p> <hr/> <p>The installation of a new planter along the southern boundary of the ANZ Building has the potential to have a <b>minor</b> impact, with the works being small-scale and low intensity.</p> <p>There is an opportunity for the proposed verge works to positively contribute to the setting of the ANZ Bank, through the installation of a high-quality and consistent verge finish.</p> <hr/> <p><b>Post-Recommendation Impact Assessment:</b> Remains at minor.</p>	<p><b>General Recommendations:</b></p> <ul style="list-style-type: none"> <li>R1—Develop and implement an Interpretation Plan to identify and interpret the history and heritage of the ANZ Bank Building and to engage with the community.</li> <li>R3—Complete an Archival Recording prior to any site disturbance and site establishment.</li> </ul> <p><b>Design Development:</b></p> <p>The proposed new softscaping should be an appropriate design, scale and materials, and allow good visibility of the building as viewed from University Avenue and London Circuit.</p> <p>Any new verge finish should be complementary to the heritage place and consistent with the proposed paving opposite, at the Law Courts Precinct.</p> <ul style="list-style-type: none"> <li>R5—Ensure the heritage values of the place/s (noted in this report) are conserved and appropriately managed.</li> </ul>

Heritage Significance	Discussion: Potential Impact Analysis of Proposed Works	Heritage Statement and Post-Recommendations Statement	Summary Recommendations
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Figure 5.1 View of southern verge. (Source: GML 2020)



Figure 5.2 Detail of southern verge finish. (Source: GML 2020)

the public domain. Measures to mitigate impact have been included within the design of the proposal and include:

- utilisation of wire-free tracks, removing the need to install vertical infrastructure to support overhead equipment; and
- location of new light rail stop 'Edinburgh Avenue' at a substantial distance from the building.

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- R5A—Reduce the number of light poles/signage/traffic signals.
- R5B—Ensure light poles/signage/traffic signals are finished in a recessive colour.
- R2E—Ensure any median strip planting is complementary and does not obscure the views to the buildings.

## 5.6.4 Civic Square Precinct

Heritage Significance	Discussion: Potential Impact Analysis of Proposed Works	Heritage Statement and Post-Recommendations Statement	Summary Recommendations
<p>Relevant key aspects of heritage significance and features intrinsic include:</p> <ul style="list-style-type: none"> <li>• Civic Square Precinct including open space, planning and design;</li> <li>• North and South Buildings;</li> <li>• Canberra Theatre Centre;</li> <li>• framing of the square; and</li> <li>• vista on the City Hill–Mount Ainslie axis.</li> </ul> <p>Refer to Section 4.2.3 for full details of heritage significance/features intrinsic.</p>	<p><b>Construction Works:</b></p> <p>Construction works would not generally be visible in significant views to and from the Precinct, namely along the City Hill–Mount Ainslie axis, and would be unlikely to have an impact on heritage significance.</p> <hr/> <p><b>Operational Impacts:</b></p> <p>No new infrastructure works are proposed to occur within the boundaries of the Civic Square Precinct; therefore it is unlikely there would be a direct, physical impact on the features intrinsic.</p> <p>Proposed permanent works in the vicinity of the precinct, including the installation of new tracks, road works and public domain works, are unlikely to have an impact due to the distance between the works and the precinct.</p> <p>Some elements of proposed permanent infrastructure may be partially visible in some secondary views to and from the precinct; however, it would not obstruct these views nor dominate the precinct.</p> <p>The works are consistent with CMP Policy 1 and Policy 6 (refer to Section 4.2.3).</p>	<p>Construction works are <b>unlikely</b> to have an adverse impact on the Civic Square Precinct.</p> <hr/> <p>New infrastructure and modifications to existing infrastructure are <b>unlikely</b> to have an adverse impact on the significance of the Civic Square Precinct.</p>	<p>No mitigation measures are recommended.</p> <hr/> <p>No mitigation measures are recommended.</p>

## 5.6.5 Law Courts Precinct

Heritage Significance	Discussion: Potential Impact Analysis of Proposed Works	Heritage Statement and Post-Recommendations Statement	Summary Recommendations
<p>Relevant key features intrinsic include:</p> <ul style="list-style-type: none"> <li>• features of the buildings that demonstrate Late Twentieth-Century Stripped Classical style;</li> <li>• siting, scale, materials, detailing and spatial arrangement of buildings within the precinct; and</li> <li>• vista along University Avenue terminating with Law Courts of the Australian Capital Territory building.</li> </ul> <p>Refer to Section 4.2.3 for full details of heritage significance/features intrinsic.</p>  <p>Figure 5.3 View south along London Circuit verge. (Source: GML 2020)</p>	<p><b>Construction Works:</b></p> <p>Construction works have the potential to obstruct and alter views of the precinct from London Circuit and the significant 'vista along University Avenue'. This visual impact would be temporary, with activities limited to the duration of the construction period and hoardings to be removed on completion of construction.</p> <p><b>Operational Impacts:</b></p> <p>The brick paving to the Reserve Bank of Australia western boundary is proposed to be retained. A 'pedestrian paver' is proposed for the remaining verge/footpath along London Circuit. The western verge/footpath finish currently comprises a mixture of new (concrete pavers, bricks) and old fabric/materials (Pebblecrete® pavers), with the overall condition and integrity across the entire western boundary of the precinct being poor and low, respectively. While highly significant, the paving within the precinct is in poor condition and in need of urgent restoration.</p> <p>The proposed removal of fabric/materials along the precinct boundary should be treated cautiously, with a conservation approach to avoid an adverse impact on</p>	<p>Construction works are likely to have a <b>minor</b> visual impact on the significance of the Law Courts Precinct, with the proposed works being temporary, reversible and low intensity.</p> <hr/> <p><b>Post-Recommendation Impact Assessment:</b> Remains at minor.</p> <hr/> <p>The removal and installation of a new verge finish is likely to have a <b>minor</b> physical impact on the significance of the Law Courts Precinct. Although the proposed works are long-term, they are localised and low intensity.</p> <p>Restoration of the courtyard in the precinct itself should be considered as a separate project by the relevant ACT government agency as a matter of urgency.</p> <hr/> <p><b>Post-Recommendation Impact Assessment:</b> Remains at minor.</p>	<p><b>General Recommendations:</b></p> <ul style="list-style-type: none"> <li>• R1—Develop and implement an Interpretation Plan to identify and interpret the history and heritage of the Law Courts Precinct and to engage with the community.</li> <li>• R3—Complete an Archival Recording prior to any site disturbance and site establishment.</li> </ul> <p><b>Conservation Approach and Design Development:</b></p> <p>Investigate the original surface treatment to the verge and determine a suitable replacement based on this investigation.</p> <p>A new verge finish/paving could be selected (based on the investigation) that is complementary to the Law Courts Precinct, and consistently applied across the entire western boundary of the precinct.</p>

Heritage Significance	Discussion: Potential Impact Analysis of Proposed Works	Heritage Statement and Post-Recommendations Statement	Summary Recommendations
	<p>the heritage significance and intrinsic features of the precinct.</p> <p>Other infrastructure works proposed adjacent to the precinct, including the new tracks, are unlikely to have an impact on the heritage significance or intrinsic features. Measures to mitigate impact have been included within the design of the proposal and include:</p> <ul style="list-style-type: none"> <li>• utilisation of wire-free technology, limiting the need to install vertical infrastructure to support overhead equipment; and</li> <li>• location of new light rail stop 'Edinburgh Avenue' at a substantial distance from the precinct, ensuring that views towards it are not permanently obscured.</li> </ul>		

## 5.6.6 Hotel Acton

Heritage Significance	Discussion: Potential Impact Analysis of Proposed Works	Heritage Statement and Post-Recommendations Statement	Summary Recommendations
<p>Relevant features intrinsic include:</p> <ul style="list-style-type: none"> <li>• Hotel Acton—the historic buildings; and</li> <li>• landscape elements (including six oak trees (<i>Quercus lusitanica</i>) along Marcus Clarke Street).</li> </ul> <p>Refer to Section 4.2.3 for full details of heritage significance/features intrinsic.</p>  <p>Figure 5.4 Oak trees along Marcus Clarke Street which are identified as significant landscape elements of Hotel Acton. (Source: GML 2020)</p>	<p><b>Construction Works:</b></p> <p>Construction works along Marcus Clarke Street, associated with potential stormwater modifications, have the potential to physically impact six oak trees (<i>Quercus lusitanica</i>) which are identified as significant elements of the Hotel Acton landscape. The trees that are closest to the proposed works should be protected and monitored during the construction period to minimise potential impact on the trees and their roots.</p> <p>Visually, construction works are unlikely to obstruct and alter views to and from the heritage place (the historic buildings), with works visually separated by a multistorey contemporary building, distance, roadways and landscaping.</p> <p><b>Operational Impacts:</b></p> <p>Proposed permanent works would be limited to potential stormwater modifications along Marcus Clarke Street and would not impact the historic buildings of Hotel Acton. This is provided the mitigation measures for protection of the six oak trees during construction works are implemented, as works would largely be subterranean and once completed would not be highly visible within the landscape.</p>	<p>Construction works are likely to have a <b>minor</b> physical impact on significant landscape elements of Hotel Acton, as the proposed works are short-term, localised and low intensity.</p> <hr/> <p><b>Post-Recommendation Impact Assessment:</b> Remains at minor.</p> <hr/> <p>New infrastructure and modifications to existing infrastructure are <b>unlikely</b> to have an adverse impact on the significance of Hotel Acton.</p>	<p><b>Tree Protection:</b></p> <p>Advice from an arborist should be obtained to plan for the protection of the oak trees and their roots during construction.</p> <p>The condition of the oak trees should be monitored during and following construction works.</p>

## 5.6.8 Ian Potter House

Heritage Significance	Discussion: Potential Impact Analysis of Proposed Works	Heritage Statement and Post-Recommendations Statement	Summary Recommendations
<p>Relevant features intrinsic include:</p> <ul style="list-style-type: none"> <li>the building; and</li> <li>setting.</li> </ul> <p>Refer to Section 4.2.3 for full details of heritage significance/features intrinsic.</p>	<p><b>Construction Works:</b></p> <p>A construction compound is proposed to be established north of Ian Potter House, across Gordon Street. The proposed compound is unlikely to have an impact on the identified features intrinsic of the heritage place or its visibility from the public domain.</p> <p>Construction works along Edinburgh Avenue and Marcus Clarke Street, namely hoardings, may obstruct the visibility of Ian Potter House and its setting from the public domain. This potential visual impact would be temporary, with works limited to the duration of the construction period, and hoardings to be removed on completion of construction.</p> <hr/> <p><b>Operational Impacts:</b></p> <p>Proposed permanent works in the vicinity of Ian Potter House would be limited to potential stormwater modifications along Edinburgh Avenue and Marcus Clarke Street. They would be unlikely to have an impact on the building or its setting as the works would be largely subterranean and once completed would not be highly visible within the landscape.</p>	<p>Construction works are likely to have a <b>minor</b> visual impact on the significance of Ian Potter House, with the proposed works being temporary, reversible and low intensity.</p> <p><b>Post-Recommendation Impact Assessment:</b> The post action impact would be reduced to a level that would be unlikely to cause impact.</p> <hr/> <p>New infrastructure and modifications to existing infrastructure are <b>unlikely</b> to have an adverse impact on the significance of Ian Potter House.</p>	<p><b>General Recommendations:</b></p> <ul style="list-style-type: none"> <li>R1—Develop and implement an Interpretation Plan to identify and interpret the history and heritage significance of Ian Potter House and to engage with the community.</li> </ul>

## 5.7 Summary of Heritage Impacts

### 5.7.1 Applying the Risk Matrix

The above impact assessment methodology has been interpreted into the risk matrix provided by MPC (Figure 5.7)—with the findings in Table 5.3.

Likelihood	Consequence				
	Insignificant	Minor	Moderate	Major	Catastrophic
Almost Certain	Medium	High	Very High	Significant	Significant
Likely	Low	Medium	High	Very High	Significant
Possible	Very Low	Low	Medium	High	Very High
Unlikely	Negligible	Very Low	Low	Medium	High
Rare	Negligible	Negligible	Very Low	Low	Medium

**Figure 5.5** Risk matrix provided by MPC. (Source: AECOM)

Undertaking a risk assessment based on the ‘likelihood’ and ‘consequence’ of the possible impact to heritage values is unlike other types of environmental risk assessments. The potential impact that is being assessed is the actual proposed works, rather than an unexpected, or unplanned occurrence. As such, much of the impact to heritage values has been deemed to have a likelihood ranking of ‘likely’.

**Table 5.3** The MPC risk assessment matrix applied to the potential impacts to the listed heritage places.

Place/Action	Likelihood	Consequence	Risk
<b>Lake Burley Griffin</b>			
Construction works	Likely	Minor	Medium
Operational works	Likely	Minor	Medium
Operation of Light Rail	Unlikely	Minor	Very Low
<b>Parliament House Vista</b>			
Construction works	Possible	Minor	Very Low
Operational works	Possible	Minor	Very Low
Operation of Light Rail	Unlikely	Insignificant	Negligible
<b>Reserve Bank of Australia</b>			

Place/Action	Likelihood	Consequence	Risk
<b>Construction works</b>	Likely	Minor	Medium
<b>Operational works</b>	Unlikely	Minor	Medium
<b>Operation of Light Rail</b>	Unlikely	Minor	Very Low
<b>Australian Academy of Science</b>			
<b>Construction works</b>	Unlikely	Minor	Very Low
<b>Operational works</b>	Unlikely	Minor	Very Low
<b>Operation of Light Rail</b>	Rare	Insignificant	Negligible
<b>City Hill</b>			
<b>Construction works</b>	Likely	Minor	Medium
<b>Operational works</b>	Likely	Minor	Medium
<b>Operation of Light Rail</b>	Unlikely	Minor	Very Low
<b>Melbourne and Sydney Buildings</b>			
<b>Refer to separate Statement of Heritage Effect.</b>			
<b>ANZ Bank Building (former ES&amp;A Bank)</b>			
<b>Construction works</b>	Likely	Minor	Medium
<b>Operational works</b>	Likely	Minor	Medium
<b>Operation of Light Rail</b>	Unlikely	Insignificant	Negligible
<b>The Civic Square Precinct</b>			
<b>Construction works</b>	Rare	Minor	Negligible
<b>Operational works</b>	Rare	Minor	Negligible
<b>Operation of Light Rail</b>	Rare	Insignificant	Negligible
<b>Law Courts Precinct</b>			
<b>Construction works</b>	Likely	Minor	Medium
<b>Operational works</b>	Likely	Minor	Medium
<b>Operation of Light Rail</b>	Rare	Minor	Negligible
<b>Hotel Acton</b>			
<b>Construction works</b>	Likely	Minor	Medium

Place/Action	Likelihood	Consequence	Risk
<b>Operational works</b>	Unlikely	Moderate	Low
<b>Operation of Light Rail</b>	Rare	Minor	Negligible
<b>Ian Potter House</b>			
<b>Construction works</b>	Unlikely	Minor	Very Low
<b>Operational works</b>	Unlikely	Minor	Very Low
<b>Operation of Light Rail</b>	Rare	Minor	Negligible

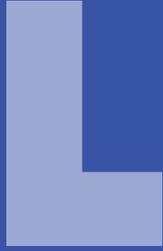
**Table 5.4** The MPC risk assessment matrix applied to the potential impacts to the ‘other’ heritage places.

Place/Action	Likelihood	Consequence	Risk
<b>Canberra the Planned National Capital</b>			
<b>Construction works</b>	Likely	Minor	Medium
<b>Operational works</b>	Likely	Moderate	High
<b>Operation of Light Rail</b>	Unlikely	Minor	Very Low
<b>National Land Roads</b>			
<b>Construction works</b>	Likely	Minor	Medium
<b>Operational works</b>	Likely	Moderate	High
<b>Operation of Light Rail</b>	Unlikely	Minor	Very Low

## 5.8 Endnotes

<sup>53</sup> Department of the Environment and Heritage, October 2009, Guidelines are Matters of National Environmental Significance Significant Impact Guidelines 1.1, Environment Protection and Biodiversity Conservation Act 1999.

## 6 Recommendations



## 6 Recommendations

### 6.1 General Recommendations

The heritage impact assessment in Section 5 finds that the Project would have a potential impact on the historic heritage values of the places within or immediately adjacent to the study area. The following recommendations are intended to inform decisions about individual heritage places, and for a 'whole of environment' heritage management approach for the next stage of design and project planning; and to assist in avoiding and mitigating identified heritage impacts noted in Section 5.

Recommendations have been numbered in this section and are referenced in the impact assessment tables in Section 5; e.g., Recommendation 1 (R1)—Interpretation Plan, is referred to in the Section 5 tables as 'R1'.

#### 6.1.1 Recommendation 1 (R1)—Interpretation Plan

During the design phase and prior to the commencement of the Project works, an interpretation plan should be prepared to identify and interpret the history and heritage values of the various places along the route, particularly those that are going to be obscured by hoardings or construction infrastructure.

The interpretation plan should inform how the detailed design of the Project is to recognise the heritage values of the place. It should include a commitment to display and present information about the evolution of the heritage fabric and values of London Circuit, Commonwealth Avenue, Lake Burley Griffin, City Hill and Canberra, including through the RLC program, in publicly accessible areas.

The plan should identify and commit to suitable interpretation devices throughout the life of the Project—from the early site establishment, construction phase and in the final completed landscape design—and could provide a timeline for the implementation of the interpretation works.

A communication strategy could also be prepared by MPC in conjunction with the interpretation plan. This should identify actions that will ensure the heritage significance of the place is well understood by the Project team and community, and actions to engage with the community about the possible heritage impacts and mitigation measures that are being undertaken (see the following Landscape Character section). It should provide a timeline for the implementation of these actions.

## 6.1.2 Recommendation 2 (R2)—Landscape Character

Consideration should be given to the retention of early plantings. Explore and document all alternatives to their proposed removal. Tree planting to replace the trees being removed would partially mitigate the impact, but this specific activity would need careful management, involving a communication plan (refer above) that has regular engagement with the community.

Prior to commencing the project works, the project should identify measures to conserve and reflect the heritage significance of the place, through landscape planning and planting, and commit to a timeline and approach for implementing these measures during and after the Project. These measures should include the following.

- R2A—Implement the key findings from the landscape structure of Commonwealth Avenue, where it is consistent with the heritage values of the place/s.
- R2B—Explore and document (in drawings and written text) all possible alternatives to the removal of historic trees.
- R2C—Where removal and replacement of trees is necessary, plant advanced tree stock of suitable varieties.
- R2D—Ensure the alignment of trees and species selection provides a consistent, defined character along the avenue in keeping with Commonwealth Avenue’s heritage values, guided by the NCA Tree Management Policy and the landscape structure.
- R2E—Ensure any plantings in the median complement the visual links between City Hill and Parliament House, without obscuring the central vista.
- R2F—Include proposed tree removal/planting works in the Communication Plan to ensure the community are aware of the impacts and mitigation measures (refer above).
- R2G—Ensure the construction compounds are reinstated to an appropriate condition after construction is complete.
- R2H—Undertake other measures to conserve and reflect the heritage significance and character of the landscape identified during the design process.

## 6.1.3 Recommendation 3 (R3)—Archival Recording

Prior to any site disturbance and site establishment, the Project should complete a general photographic archival recording of Commonwealth Avenue from City Hill to Commonwealth Avenue Park, and of London Circuit from Edinburgh Avenue to the

Commonwealth Avenue on-ramp in the east, as well as within the areas to be occupied by construction compounds.

- R3A—MPC should make provision for information to be permanently accessible through the ACT Government website or another suitable platform as an archival record of the works and RLC program.
- R3B—MPC should ensure recording is undertaken in accordance with published best-practice guidelines for heritage archival recording, e.g.: Photographic Recording of Heritage Items Using Film or Digital Capture (2006) guidelines issued by the New South Wales Heritage Office, and How to Prepare Archival Records (1998) guidelines issued by the Heritage Council of NSW.

#### **6.1.4 Recommendation 4 (R4)—Unanticipated Finds Protocol**

Although there are no predicted impacts on Aboriginal or historical archaeology, if remains were to be unexpectedly encountered, an unanticipated finds protocol should be implemented for the construction works. Construction workers should be made aware of this protocol during site induction.

The following recommendations for managing Aboriginal or historical archaeology are made.

- Inform construction personnel during site induction of the possibility of encountering unexpected archaeological remains and the existence of an unanticipated finds protocol.
- Adopt the following unanticipated finds protocol:

If archaeological relics or remains are found during construction work, all work in the immediate area of the find should cease.

- The study area should be secured by the construction site manager and an archaeologist must be called to the site to assess the nature and significance of the find.
- The archaeologist would assess the required management of the find based on its significance and in conjunction with the construction site manager. Management actions may include contacting the RAOs where the find relates to Aboriginal archaeology, along with ACT Heritage to discuss and confirm the general management actions.
- Construction work would resume after the implementation of appropriate mitigation measures.

- Implement the following protocol where human skeletal remains are unexpectedly found during construction work:
  - The study area should be secured by the construction site manager and the police informed along with the RAOs, ACT Heritage and an archaeologist.
  - Further action would depend upon the nature of police investigation. If the remains are deemed to be of historical value and not from a recently deceased person, the RAOs and archaeologist should assess the management of the find based on its significance and in conjunction with the construction site manager.

### **6.1.5 Recommendation 5 (R5)—Further Design Development**

Before commencing the relevant element of the Project, MPC should resolve the following design issues, to ensure the heritage values of the place/s are conserved, appropriately managed, and maintained.

- R5A—Reducing the number of light poles/signage/traffic signals to as few as possible to conserve the urban/cultural landscape setting.
- R5B—Ensuring light poles/signage/traffic signals are finished in a recessive colour; e.g., in Dulux Eternity in Bronze Pearl Satin, as per Northbourne Avenue Light Rail infrastructure.
- R5C—Ensuring the width and alignment of the verges and median strip of Commonwealth Avenue are retained, where possible, and are consistent with the landscape structure of Commonwealth Avenue.
- R5D—Reducing the quantity of paving/bitumen to that which is required. Selecting grassed areas over paving/bitumen where possible (and appropriate).
- R5E—Any other issues identified during the design process with impact on the heritage values.

The identification and resolution of these design features should be undertaken in consultation with heritage advisors, and possibly an independent design review panel, with specific consideration for the conservation of heritage values.

Once resolved and before the specific project elements are commenced, MPC should notify the relevant planning authority of the final design decisions and make this information publicly available.

## **6.2 Specific Recommendations for ACT Heritage Places**

### **6.2.1 ANZ Building**

- Plan the proposed new softscape to an appropriate design and scale and with appropriate materials, and allow good visibility of the building as viewed from University Avenue and London Circuit.
- Select a new verge finish that complements the heritage place and is consistent with the proposed paving at the Law Courts Precinct.

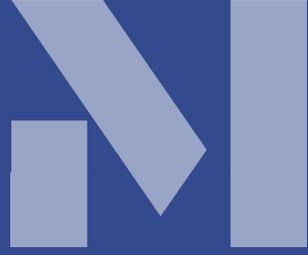
### **6.2.2 Law Courts Precinct**

- Further investigate the original surface treatment to the verge, footpath of the Law Courts Precinct, particularly around the Reserve Bank of Australia.
- Following further investigation into the original surface treatment, a new verge finish/pedestrian paving could be selected that is complementary to the Precinct, and consistently applied across the entire western boundary of the Precinct.
- Conserve and select suitable paving to ensure it complements the adjacent courtyard/civic space of the Law Courts Precinct, which is highly significant.

### **6.2.3 Hotel Acton**

- A protection plan for the oak trees and their roots during construction should be developed in accordance with advice from an arborist.
- Monitor the condition of the oak trees during and following construction works.

# Appendices

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# Appendices

## Appendix A

Indigenous Heritage Values Study

## Appendix B

Vegetation and Natural Heritage Values Study

# Appendix A

Indigenous Heritage Values Study

# Appendix A—Indigenous Heritage Values Study

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## Methodology

The assessment of the Aboriginal heritage values of the project area included background research into the known and recorded Aboriginal cultural and archaeological sites in and around the City to Commonwealth Park Light Rail Project study area and consultation with the relevant local Aboriginal community.

## Background Research

### ACT Heritage Data

A search of the ACT Heritage Register was requested on 24 January 2020 for the study area. Results were received from ACT Heritage on 5 February 2020.

Search results indicated that there are no recorded sites within or in the immediate area of the proposed City to Commonwealth Park Light Rail Project route between Alinga Street and Commonwealth Park. The prospect of undiscovered or unrecorded Aboriginal heritage sites should be considered.

### Archaeological Sites Data and Previous Investigations

Several archaeological studies have been undertaken for areas which include the City to Commonwealth Park Light Rail Project study area. The most relevant of these include a Heritage Impact Assessment (HIA) undertaken for the Capital Metro, ACT Light Rail – Russell Extension Project, prepared by GML in 2015,<sup>i</sup> and an Aboriginal Heritage Desktop Study undertaken for the Canberra Light Rail Stage Two Project, prepared by RPS Group (RPS) in 2018.

GML prepared a HIA for the Capital Metro ACT Light Rail Russell Extension in 2015. This 2015 HIA examined the City to Commonwealth Park Light Rail Project study area, as well as an area to the east of this up to the Royal Military College, Duntroon (RMC Duntroon). A search of the ACT Heritage Register was also undertaken for the assessment but found no previously recorded Aboriginal heritage sites within or in the immediate area of the proposed works. Four Aboriginal heritage sites were located within the broader search area, on basal slopes of Mount Pleasant, approximately 2.5 kilometres east of the City to Commonwealth Park Light Rail Project study area. These sites included three stone artefact scatters (MPAS1, MPAS2 and NCAR-AS-1) and one isolated artefact (AIF2). An area of archaeological potential associated with MPAS1 was identified.

The 2015 HIA also included a review of previous studies. These highlighted Aboriginal cultural values of the area, including that the route had once been part of a general thoroughfare between Mount Ainslie, Mount Pleasant and the Molonglo River.<sup>ii</sup> The 2015 HIA noted an area of archaeological potential which had been previously identified in Kings Park, and that a ceremonial site had been noted in the vicinity of the Molonglo River at the base of Mount Pleasant. Based on these results, GML found that there was evidence of the landscape used by Aboriginal people in the past, but that landscape modification to the road and city corridor would have destroyed most if not all Aboriginal sites in the study area.<sup>iii</sup>

Consultation in April 2015 was undertaken with the four ACT RAOs for the Capital Metro, ACT Light Rail—Russell Extension project.<sup>iv</sup> There was a general agreement that the road corridors along which the proposed Russell Extension was aligned would have been subject to significant disturbance in the past and that previous studies in the area had not yielded any meaningful results.

The Lake Burley Griffin Heritage Assessment prepared by GML in 2010 (2010 HA), includes the inundated Lake Burley Griffin area to the south of the current project area, along with the West Basin which is located to the west of the City to Commonwealth Park Light Rail Project study area.<sup>v</sup> It included a review of previous archaeological research and consultation (April—May 2006) with the ACT RAOs.<sup>vi</sup> The 2010 HA reviewed the findings of the HP Moss collection of Aboriginal stone tools, which were collected by Moss in Canberra during 1929 and the 1930s in areas under threat of immediate development. Around Old Canberra Hospital (now within the ANU), Moss collected 30 artefacts and a similar number of debitage fragments. He also documented numerous artefacts along the Acton Peninsula.

Similarly, an Indigenous heritage values study for the ANU Campus conducted by GML Heritage in 2011<sup>vii</sup> included a background summary of historical collections of artefacts in the near area including those by Moss (noted above), plus records from Kinsela who collected artefacts in the area around the current National Sound and Film Archive building, including a large grinding stone and two pounding stones. One of these artefacts was collected from a location adjacent to Sullivan's River, and the other from the area south of the current National Sound and Film Archive building.

RPS has prepared several assessments for the Canberra Light Rail Stage 2 (City to Woden) project. These have included a high-level constraints analysis report in 2017,<sup>viii</sup> a preliminary environmental assessment report also in 2017<sup>ix</sup> and an Aboriginal heritage desktop study.<sup>x</sup> These studies includes the City to Commonwealth Park Light Rail Project study area. Results from those assessments included the following recorded Aboriginal cultural sites and values:

- Capitol Hill (about 2 kilometres south of the current study area) was identified as a 'women's area' by Ngunawal man Don Bell (now deceased) to local historian Ann Gugler in 2009.<sup>xi</sup> The hill is also recorded as being part of a wider cultural landscape which also includes Black Mountain and Mount Ainslie, and is situated on a traditional route through the landscape. A number of Aboriginal archaeological artefacts, including scrapers, points and an axe head were found during the construction of the Parliament House and lawns in this area.<sup>xii</sup>
- Molonglo River Landscape, which is now inundated with Lake Burley Griffin, was identified as being of cultural significance and likely to contain Aboriginal archaeological sites.
- Aboriginal Tent Embassy (about 1.2 kilometres southeast of the current study area) is an Aboriginal heritage site and included on the CHL as part of the Parliament House Vista. Since 1972, the site has been used for protest that have drawn international attention to Aboriginal land rights and the genocidal treatment of Aboriginal Nations and Peoples. It is symbolic of the ongoing struggle for Aboriginal and Torres Strait Islander sovereignty in Australia.<sup>xiii</sup>

The RPS desktop study<sup>xiv</sup> included a predictive model for Aboriginal heritage sites which stated that archaeological resources may include:

- evidence of campsites near historical watercourses in areas which have had minimal disturbance;
- Aboriginal burials, which are mentioned in early accounts for the local area and may occur in the study area; and
- Aboriginal archaeological potential associated with Capitol Hill and surrounds.<sup>xv</sup>

Of greatest relevance to the City to Commonwealth Park Project is the prediction that evidence of campsites may be located near watercourses which have had minimal disturbance. Other than

inundation, the landforms around the Molonglo River main channel are relatively undisturbed and therefore may have archaeological potential, albeit submerged.

Prior to the development of Canberra, City Hill, located within the City to Commonwealth Park study areas likely to have been an ideal camping zone for Aboriginal people, in close proximity to a permanent water source, the Molonglo River, and with an elevated, well-drained position. The general lower slopes of the banks of the Molonglo River would also have been in regular use for resource procurement activities. However, the substantial development of the Canberra city area, City Hill, Commonwealth Avenue Bridge and the reformation of West Basin would have all but destroyed those sites, save for those submerged near the Molonglo River channel.

The Aboriginal Tent Embassy is an important heritage site. However, it is located about 1.2 kilometres southeast of the current study area, and therefore is not relevant to this impact assessment.

## **Aboriginal Community Consultation**

### **Buru Ngunawal Aboriginal Corporation—Wally Bell—18 May 2020**

Wally Bell noted that the Canberra CBD area, Acton and the Western Basin, Commonwealth Park and all of the surrounding landscape was well-known for having been occupied by Ngunawal people prior to the arrival of colonial settlers. However, Wally made clear that the current level of urban development has irreversibly altered the landscape such that the original landforms are considerably less legible than in the past.

The formation of the lake, including the West Basin; the approaches to Commonwealth Avenue Bridge; and the landscaping of Commonwealth Park have altered the legibility of the Molonglo River and its banks—formerly traditional zones of occupation and resource gathering. Overall landform changes to the slopes and surrounds of City Hill have also substantially modified the legibility of the original landscape and will have destroyed any evidence of prior Aboriginal occupation of the area.

Of key importance to this area is the known presence of a number of limestone caves in the lower slopes of Acton Peninsula, now flooded by West Basin. These caves were of cultural significance to the Ngunawal people, and are said to have cultural paintings in them.

The zone of land around City Hill is centrally located in a cultural landscape that includes Black Mountain, Mount Ainslie and Capitol Hill, all of which were significant cultural and navigational markers.

The crossing point over the Molonglo River in the near area was from the end of Acton Peninsula which provided access to the major ceremonial and meeting site at the current Australian Parliament House. It also allowed access to the Ngunawal women's birthing site area now known as Bullan Murra (Women's Path) at Stirling Ridge, Yarralumla. This area also contains numerous Ngunawal Aboriginal sites and objects including a rare post contact site.

Given that the main local crossing point over the Molonglo River was from the end of Acton Peninsula, Commonwealth Avenue Bridge and its constructed landscape do not mirror or reflect any aspect of the Aboriginal traditional use of the landscape.

The addition of the Canberra Light Rail to the road corridor around the City Hill and onto Commonwealth Avenue Bridge does not affect the cultural values of the area any more than they have already been affected.

## **Mirrabee—Paul House—11 June 2020**

The land that the Canberra Light Rail Stage 2 project area is located within part of the broader Kamberri/Ngambri cultural landscape. The traditional occupation of this area by the Aboriginal people is attested to in the adaptation of the name Canberra from the word Kamberri which in itself was derived from Ngambri. The use of the name is shown in Surveyor Dickson's maps, and on property such as JJ Moore's Canberry station, which occupied the land now covered by the ANU.

Paul House refers to Jackson-Nakano's research confirming the naming of Canberra, "There is little doubt that Ngambri or Ngambra or similar renditions into English is the original name on which the modern spelling of Canberra is based. It was the name that referred not just to the place but also to the people."<sup>xvi</sup> He also noted that the Ngambri people and the Pialligo people—both recorded as occupying parts of the Canberra area were in fact the same people—they were Walgalu speakers.

Cultural values associated with the study area are long-term spiritual values associated with the landscape—Paul stated that the spirits are in the land; they were there long before us and will continue to be there long after us. On that basis, while the landscape values have been substantially impacted by urban development, the addition of the Canberra Light Rail to the road corridor around the City Hill and onto Commonwealth Avenue Bridge does not affect the cultural values of the area any more than they have already been affected.

Paul House also noted that at Capitol Hill the construction of both Old Parliament House and New Parliament House has destroyed a traditional women's site. At present, this site is beyond the scope of the study area.

The Ngambri people wish to state that they have not ceded sovereignty or their Native Title rights to the lands of the ACT region.

## **King Brown's Tribal Group**

The representatives of King Browns Tribal Group were unable to be contacted for this project consultation.

## **Ngarigo Currawong Clan**

The representatives of Ngarigo Currawong Clan were unable to be contacted for this project consultation.

## **Summary**

The City to Commonwealth Park Project is situated between Black Mountain (approximately 2 kilometres to the west), Mount Ainslie (approximately 2.6 kilometres to the northeast) and Mount Pleasant (approximately 2.7 kilometres to the southwest). Aboriginal heritage sites have been recorded within the vicinity of these landscape features, as well as at the ANU around Sullivan's Creek, on Acton Ridge and along the banks of the Molonglo River prior to the establishment of Lake Burley Griffin. These landscape features were key focal points of Aboriginal occupation and have previously been identified as significant Aboriginal places.

The proposed City to Commonwealth Park Project route has been assessed as part of previous studies for the Capital Metro, ACT Light Rail—Russell Extension<sup>xvii</sup> and the Canberra Light Rail Stage 2 City to Woden project.<sup>xviii</sup> These studies also included areas to the east of the current study area, towards Russell, as well as to the south, towards Woden. Areas of archaeological potential have been identified in the area around Capitol Hill, at the Aboriginal Tent Embassy and within landscapes along the

Molonglo River (which have now been submerged). No previously recorded sites or areas of archaeological potential have been identified within the current study area.

The City to Commonwealth Park Project study area has been disturbed by the construction of roads and buildings and the installation of utilities. Due to this disturbance, the potential for archaeological sites to occur is considered to be low.

Consultation with the Aboriginal community has confirmed that the general landscape was, and continues to be, of significance to them. The cultural values of the study area have been impacted by past activities but endure beyond the development of Canberra. The current project work does not impact those values any more than they have already been affected.

## Endnotes

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- <sup>i</sup> GML Heritage 2015, *Capital Metro, ACT Light Rail-Russell Extension-Heritage Impact Assessment*, report prepared for Parsons Brinckerhoff on behalf of Capital Metro Agency.
  - <sup>ii</sup> GML Heritage 2015, *Capital Metro, ACT Light Rail-Russell Extension-Heritage Impact Assessment*, report prepared for Parsons Brinckerhoff on behalf of Capital Metro Agency.
  - <sup>iii</sup> GML Heritage 2015, *Capital Metro, ACT Light Rail-Russell Extension-Heritage Impact Assessment*, report prepared for Parsons Brinckerhoff on behalf of Capital Metro Agency.
  - <sup>iv</sup> GML Heritage 2015, *Capital Metro, ACT Light Rail-Russell Extension-Heritage Impact Assessment*, report prepared for Parsons Brinckerhoff on behalf of Capital Metro Agency.
  - <sup>v</sup> GML Heritage 2010, *Lake Burley Griffin Heritage Assessment*, report prepared for the National Capital Authority.
  - <sup>vi</sup> GML Heritage 2010, *Lake Burley Griffin Heritage Assessment*, report prepared for the National Capital Authority.
  - <sup>vii</sup> GML Heritage 2011 *ANU Master Plan 2030 – Indigenous Heritage Assessment*. report prepared for GHD Pty Ltd on behalf of the ANU.
  - <sup>viii</sup> RPS 2017, *Canberra Light Rail Stage 2: Environmental Constraints Analysis Report*, report prepared for Transport Canberra and City Services.
  - <sup>ix</sup> RPS 2017, *Canberra Light Rail Stage 2: Preliminary Environmental Assessment*, report to Transport Canberra and City Services.
  - <sup>x</sup> RPS 2018, *Canberra Light Rail Stage 2 Environmental Aboriginal Heritage Study*, report prepared for Transport Canberra and City Services, p 25.
  - <sup>xi</sup> RPS 2018, *Canberra Light Rail Stage 2 Environmental Aboriginal Heritage Study*, report prepared for Transport Canberra and City Services, p 25.
  - <sup>xii</sup> Australian Heritage Database, Place ID 18843 'Aboriginal Embassy Site, King George Tce, Parkes, ACT, Australia' (RNE Listing) [http://www.environment.gov.au/cgi-bin/ahdb/search.pl?mode=place\\_detail;search=place\\_name%3Dtent%2520embassy%3Bkeyword\\_PD%3Don%3Bkeyword\\_SS%3Don%3Bkeyword\\_PH%3Don%3Blatitude\\_1dir%3DS%3Blongitude\\_1dir%3DE%3Blongitude\\_2dir%3DE%3Blatitude\\_2dir%3DS%3Bin\\_region%3Dpart;place\\_id=18843](http://www.environment.gov.au/cgi-bin/ahdb/search.pl?mode=place_detail;search=place_name%3Dtent%2520embassy%3Bkeyword_PD%3Don%3Bkeyword_SS%3Don%3Bkeyword_PH%3Don%3Blatitude_1dir%3DS%3Blongitude_1dir%3DE%3Blongitude_2dir%3DE%3Blatitude_2dir%3DS%3Bin_region%3Dpart;place_id=18843)
  - <sup>xiii</sup> RPS 2018, *Canberra Light Rail Stage 2 Environmental Aboriginal Heritage Study*, report prepared for Transport Canberra and City Services, p 25.
  - <sup>xiv</sup> RPS 2018, *Canberra Light Rail Stage 2 Environmental Aboriginal Heritage Study*, report prepared for Transport Canberra and City Services, p 26.
  - <sup>xv</sup> RPS 2018, *Canberra Light Rail Stage 2 Environmental Aboriginal Heritage Study*, report prepared for Transport Canberra and City Services, p 26.
  - <sup>xvi</sup> Jackson-Nakano, A., n.d. Ngambri Ancestral Names for Geographical Places and Features in the Australian Capital Territory and Surrounds. Published by Ann Jackson-Nakano and Associates.p27
  - <sup>xvii</sup> GML Heritage 2015, *Capital Metro, ACT Light Rail-Russell Extension-Heritage Impact Assessment*, report prepared for Parsons Brinckerhoff on behalf of Capital Metro Agency.
  - <sup>xviii</sup> RPS 2018, *Canberra Light Rail Stage 2 Environmental Aboriginal Heritage Study*, report prepared for Transport Canberra and City Services.

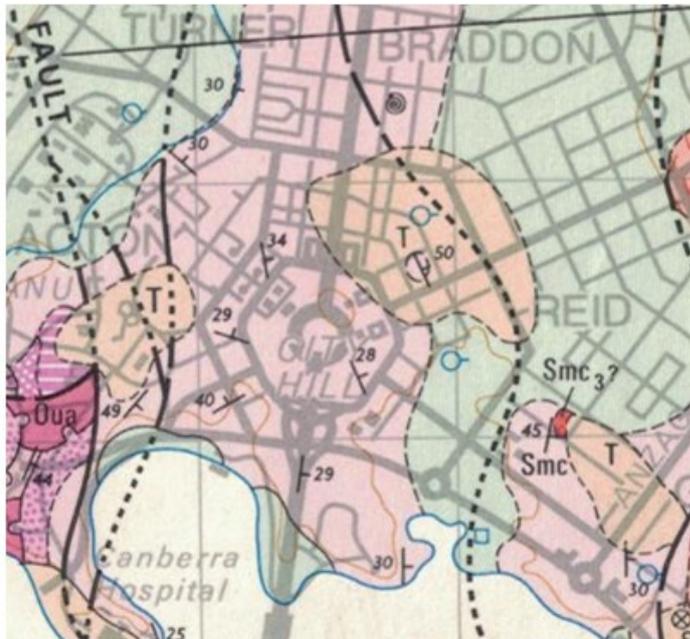
# Appendix B

Vegetation and Natural Heritage Values Study

## Appendix B—Vegetation and Natural Heritage Values Study

### Natural History of the Site

The City Hill and London Circuit area is on the Canberra Formation of late Silurian calcareous shale, limestone and sandstone, bordered to the east and west by Quaternary and Tertiary alluviums (Figure 1).



#### Key: Site geology

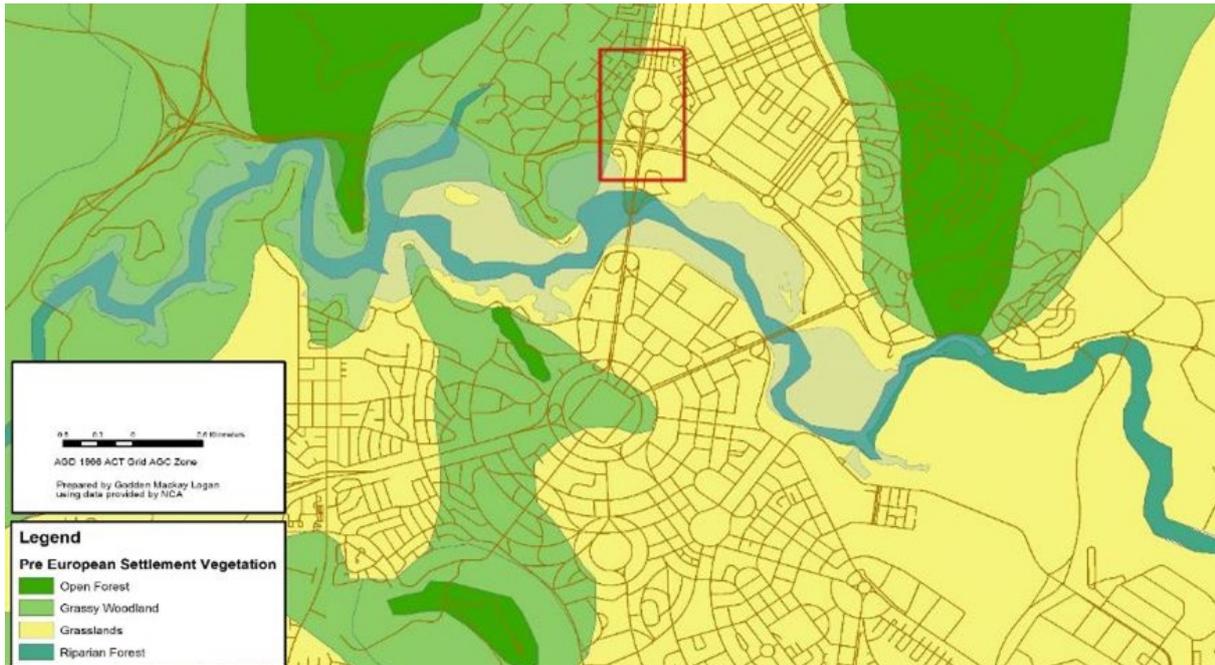
Smc (shaded pink) = Canberra Formation calcareous shale, limestone and sandstone.

Qa (shaded green) = Quaternary alluvium.

T (shaded orange) = Tertiary alluvium.

**Figure 1** Excerpt showing the geology of the City to Commonwealth Park Light Rail Project study area. (Source: Geology of Canberra, Queanbeyan, and Environs 1: 50,000 Bureau of Mineral resources, 1980)

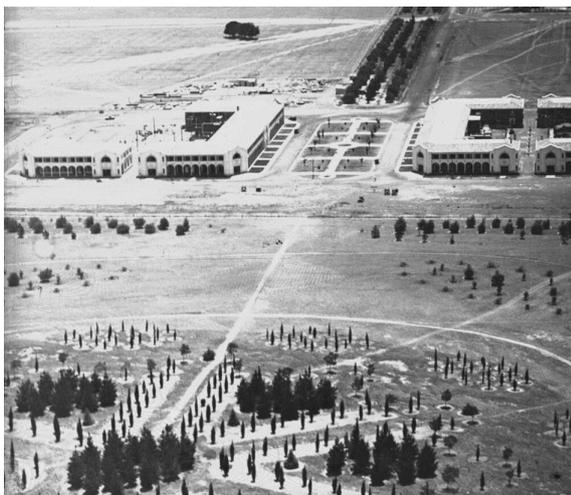
Pre-settlement vegetation of this area was natural temperate grassland and *Eucalyptus melliodora* / *E. blakelyi* grassy woodland, both characteristic communities of the Limestone Plains (Figure 2).



**Figure 2** Estimated extent of pre-1750 vegetation in the City to Commonwealth Park Light Rail Project study area (indicated by a red outline) and surrounds. (Source: GML Lake Burley Griffin Heritage Management Plan, 2009)

## Landscape Changes

City Hill and its surroundings were one of the first areas to receive formal landscaping treatment in the early laying out of Canberra city. The geometric planting of cypresses, pine trees and false acacia on the hill and surrounding satellite plantings of elm and cherry groups was accomplished in the 1920s. The wide median of Northbourne Avenue between the Melbourne and Sydney buildings received similar treatment, with inner and outer lines of cypress and English elm respectively (Figure 3). At this time, the hill and surroundings still supported natural grasslands as groundcover (Figure 4).



**Figure 3** Formal landscape planting on City Hill, London Circuit and Northbourne Avenue, c1927. (Source: National Library of Australia, obj-141457948)



**Figure 4** Group plantings on City Hill showing grassland groundcover, cypress and false acacia (foreground) and cherry plum and English elm (middle ground), c1927. (Source: National Australian Archives, 3109583 )

Decades of landscape management, mowing and weeding to achieve a lawn-like groundcover have removed all vestiges of the floristics of natural grassland. A recent biodiversity survey of the construction zone found that the existing grassed areas comprised mixed native and exotic grasses where the

underlying soils are highly modified and disturbed, lacking characteristic properties associated with natural landscapes. The typical groundcover species included African Lovegrass, Chilean Needle Grass *Nassella neesiana*, and Plantain *Plantago lanceolata*.<sup>1</sup> Therefore, no vegetation communities or individual flora species with natural heritage value are located within the study area.

London Circuit was initially laid out in 1921 as a broad, divided hexagonal parade with wide medians containing formal plantings similar to Northbourne Avenue. The plan was based upon agreement (and disagreement) between Walter Burley Griffin and Charles Weston, officer-in-charge Afforestation (later Parks and Gardens) 1913 to 1926 and simultaneously Director of City Planning 1921 to 1926. The agreement was for the layout of plantings on City Hill and the wide thoroughfare of London Circuit. The disagreement was about species to be used. Griffin wanted evergreens throughout, but Weston favoured deciduous and flowering trees.<sup>2</sup> The resulting plan was for evergreens at the top of City Hill (*Cupressus sempervirens*, *Robinia pseudoacacia* and *Pinus radiata*) with inner rings of deciduous flowering trees (*Prunus cerasifera*) and an outer ring, tracing the alignment of London Circuit, of alternating flowering and non-flowering deciduous trees (*Ulmus carpifolia* and *Prunus cerasifera*)—all in formal patterns.

It was Weston's method to plant densely and thin later after successful establishment. This landscaping phase of maintenance, culling and replacement continued through to the 1950s. This changed in the second half of the 1950s, as infill developments and carparks started to replace the internal areas and their landscaping, and London Circuit was reduced to a narrower ring road without median plantings. At the same time, a smaller diameter ring road was constructed (now Vernon Circle) around the summit of City Hill, linking with Northbourne Avenue in the north and Commonwealth Avenue in the south.

In a 1959 photograph (Figure 5), remnants of the 'satellite' plantings of elms and cherry plums in oval-shaped groups are visible on the hill slopes in addition to other group plantings along London Circuit. No other street trees along London Circuit are apparent at this time.



**Figure 5** City Hill and northwest London Circuit in 1959 showing progressive infill development of the 1920s landscaped area. (Source: National Library of Australia, obj-143728467)

By 1973, the cypresses had been removed from the Northbourne Avenue median between the Sydney and Melbourne buildings, leaving only the elms. Eucalypts had been planted on the foreshore lands between Commonwealth Avenue and Acton Park, and elms had been planted as street trees along both sides of Commonwealth Avenue leading to the bridge.

## GML Heritage

By 1980, street trees had been established along both sides of London Circuit from Northbourne Avenue to Edinburgh Avenue (mainly plane trees), and scattered Eucalypts had been planted along Parks Way and along the edges of the ramps to and from that road. Remnants of the original London Circuit plantings were incorporated into the new streetscape on the northern side of London Circuit, between Edinburgh Avenue and Commonwealth Avenue (Figure 6).



**Figure 6** The northern side of London Circuit, between Edinburgh Avenue and Commonwealth Avenue, 1980. One of the original six oval-shaped groups of cherry plum is visible in the foreground. (Source: National Archives of Australia, 11721143)

## Current Vegetation

Extensive clearing of the original landscape plantings and expansion of development between London Circuit and the upper parts of City Hill has occurred. The current vegetation located within the study area has been inventoried (Table B.1) and mapped (Figure 7).

**Table B.1** Inventory of Current Vegetation Located within Study Area.

Code	Species Name	Common Name
1	<i>Ulmus carpifolia</i>	English elm
2	<i>Ulmus carpifolia</i> var. <i>variegata</i>	Variiegated English elm
3	<i>Platanus orientalis</i>	Oriental plane
4	<i>Platanus x acerifolia</i>	London plane
5	<i>Ulmus parvifolia</i>	Chinese elm
6	<i>Juniperus sabina</i> (groundcover)	Savin juniper
7	<i>Quercus palustris</i>	Pin oak
8	<i>Prunus cerasifera</i>	Cherry plum
9	<i>Eucalyptus mannifera</i>	Brittle gum
10	<i>Eucalyptus cinerea</i>	Argyle apple
11	<i>Acacia</i> shrubs (mixed)	Wattle

Code	Species Name	Common Name
12	<i>Fraxinus excelsior</i>	English ash
13	<i>Grevillea</i> and <i>Acacia</i> mixed shrubs	Grevillea/Wattle
14	<i>Robinia pseudoacacia</i>	False acacia
15	<i>Quercus robur</i>	English oak
16	<i>Phoenix canariensis</i>	Canary Island palm
17	<i>Photinia glabra</i>	Photinia

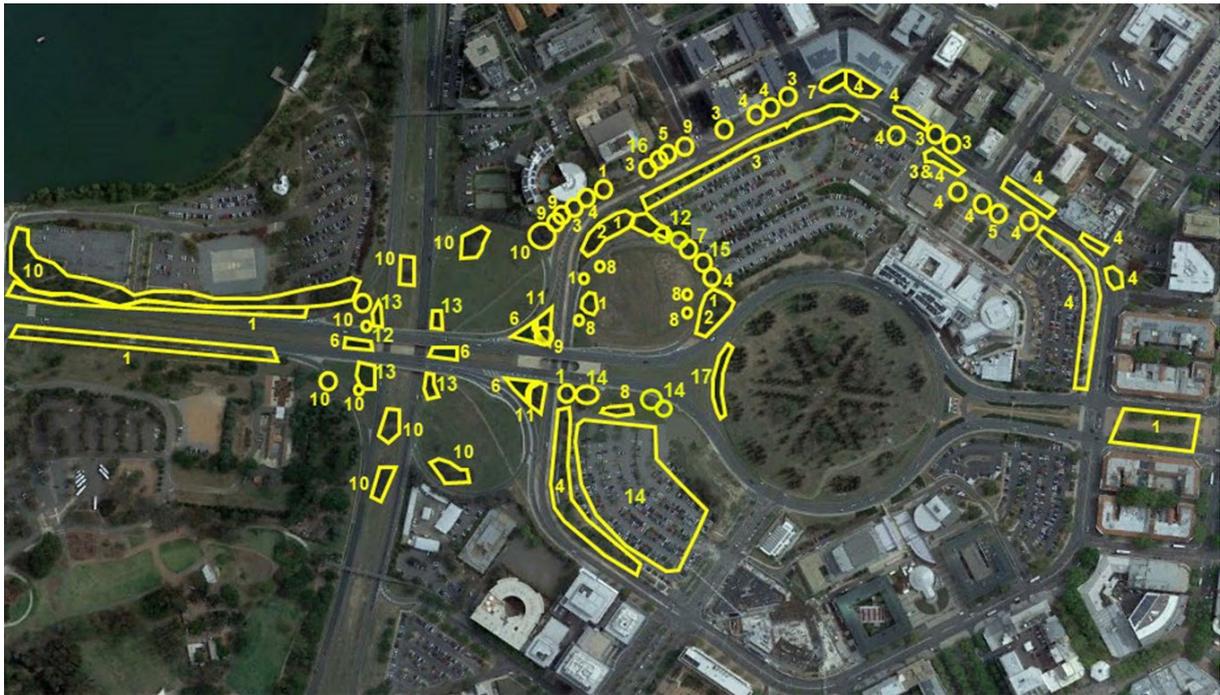


Figure 7 Current vegetation within the study area. (Source: Google Earth base map with GML overlay)

## Heritage Values

### Cultural Plantings

The most significant tree groups in the study area are the remnants of the original Weston plantings from the 1920s that followed the amended Griffin plan. The most significant group is located on the summit of City Hill. This group will not be affected by the development but it is interesting to note that restoration of this group to Weston's original configuration is currently underway, with the reinstatement of *Pinus radiata* plantings between the radial *Cupressus* lines as well as the addition of a circle of *Robinia pseudoacacia* trees (Figure 8 and Figure 9). This restoration work is appropriate for a place listed on the ACT Heritage Register and indicates the value placed by the community on this early landscape scheme.



**Figure 8** Replanting of *Pinus radiata* groups on City Hill. (Source: Griffin Associates Environment, 2019)



**Figure 9** Advanced *Robinia pseudoacacia* on City Hill. (Source: Griffin Associates Environment, 2019)

Within the study area, there are four small groups of trees with links to the original Weston landscaping plan for the City Hill precinct (areas outlined in red in Figure 10). Two groups are situated along the northern side of London Circuit, the third group is located in the northern section of the cloverleaf between Vernon Circle and London Circuit, and the final group is between the Melbourne and Sydney buildings, along Northbourne Avenue. Another tree, an old *Robinia pseudoacacia* located on the eastern side of Commonwealth Avenue, may also date from this earlier period when this species was interplanted among the cypresses on City Hill (area outlined in yellow in Figure 10).



**Figure 10** Location of four tree groups that are remnants of the original Weston landscaping plan for the City Hill precinct. (Source: Google Earth base map with GML overlay)

The trees in these areas were subject to management and maintenance that included culling and replacement of diseased or damaged trees from the 1920s up until the late 1950s. Therefore, the older trees in these groups may be either original plantings or replacements planted pre-World War II.

The two groups of *Ulmus carpinifolia* trees located along the northern side of London Circuit are remnants, or pre-war replacements, of the original formal group plantings located on the median of the planned wide parade of this road (Figure 11 and Figure 12).

The *Prunus cerasifera* group, located in the northern section of the cloverleaf, between Vernon Circle and London Circuit, is a remnant of the only surviving oval-shaped group (of the original six) of flowering cherry plums from the 1920s (Figure 13). The oval shape can be traced on the ground from the craters of removed trees.

The group located between the Melbourne and Sydney buildings on Northbourne Avenue was originally mixed *Cupressus sempervirens* and *Ulmus carpifolia*—species which link the original planting themes of City Hill and London Circuit. Today, only the *Ulmus* survives here and many are replacements.



**Figure 11** English elm (*Ulmus carpifolia*) located along northern side of London Circuit as identified in Figure 10. (Source: Griffin Associates Environment, 2019)



**Figure 12** English elm (*Ulmus carpifolia*) located along northern side of London Circuit as identified in Figure 10. (Source: Griffin Associates Environment, 2019)



**Figure 13** Remnant cherry plum (*Prunus cerasifera*) trees located in the northern section of the cloverleaf, between Vernon Circle and London Circuit. (Source: Griffin Associates Environment, 2019)



**Figure 14** False acacia (*Robinia pseudoacacia*) located on the eastern side of Commonwealth Avenue. (Source: Griffin Associates Environment, 2019)

## Natural Heritage

All native tree species within the construction footprint and potential construction compound locations have been planted and are not remnants of original site vegetation. The surviving grassed areas comprise mixed native and exotic grasses where the underlying soils are highly modified and disturbed, lacking the characteristic properties associated with natural landscapes. The typical groundcover species include the exotics African lovegrass, Chilean needle grass (*Nassella neesiana*), and plantain (*Plantago lanceolata*).<sup>3</sup> There are therefore no vegetation communities or individual flora species present with natural heritage value.

Despite the lack of natural grassland community, the golden sun moth has been recorded in the grassed areas of Vernon Circle, the cloverleaf areas and Parkes Way median strips in a number of surveys. These include Biosis in 2015,<sup>4</sup> SMEC in 2016,<sup>5</sup> SMEC in 2017<sup>6</sup> and Biosis in 2017.<sup>7</sup> The golden sun moth is listed as vulnerable under the Commonwealth *Environment Protection and Biodiversity*

Conservation Act 1999 (EPBC Act) and therefore is a Matter of National Environmental Significance (MNES) requiring referral to the Commonwealth Minister for the Environment under the Act.

The most recent survey (Biosis 2019) found a population of 52 individual golden sun moths, with the highest densities observed within the modified grassland vegetation located in the cloverleaf road network of the Commonwealth Avenue/Parkes Way interchange. The survey assumed that the area of habitat likely to support larvae is contiguous with sites where adults were identified. The Biosis survey resulted in a total of 2.6 hectares of golden sun moth habitat being identified within the study area (Figure 15).



Figure 15 Golden sun moth population trends. The study area is indicated by the purple line. (Source: Arup, City to Commonwealth Park Light Rail EPBC Act preliminary documentation, June 2020).

These survey efforts should continue, accumulating data on the environmental determinants of the moth's continued survival in this location. However, the surveys to date, taken together, provide clear evidence of the link between a population of a critically endangered species listed under the EPBC Act and the place—despite the non-natural habitat in which it is found. The research described in the current report indicates that the area was originally natural temperate grassland. Thus, although the grassed areas are no longer this vegetation community, they can be considered to be a significantly modified version of that community rather than a separate, wholly human-made habitat.

Natural heritage is defined by the Australian Natural Heritage Charter.<sup>8</sup> Article 1.1 of the charter states that an item or place of natural heritage value needs to demonstrate 'natural significance'. Natural significance means the importance of ecosystems, biodiversity and geodiversity for their existence value or for present and future generations. Articles 13, 14 and 15 of Part B Conservation Principles covers the proposition that modified habitat may still have natural significance. It is noted that the consideration of modified habitat in the charter is in the context of conservation planning and management and part of the decision-making on whether and how the natural heritage item should be conserved.

It is therefore concluded that the persistent occurrence of golden sun moth in the grassed areas, coinciding with some of the potential construction support and works compound sites for the light rail project construction, is of natural heritage value—although of lower comparative value than areas where the biodiversity of natural temperate grasslands, including golden sun moths, is intact.

Future environmental impact work in conjunction with referral under the EPBC Act will need to determine, among other things, the sustainability of the golden sun moth population in the location and in response to different management regimes and developmental impacts.

## Endnotes

- <sup>1</sup> Biosis 2019, City to Commonwealth Park Preliminary Environmental Assessment, p 15.
- <sup>2</sup> Taylor, K 2006, Canberra, *City in the Landscape*, Halstead Press, Sydney and National Capital Authority, Canberra.
- <sup>3</sup> Biosis 2019, City to Commonwealth Park Preliminary Environmental Assessment: Biodiversity, Draft Report Prepared for Transport Canberra and City Services, 14 June 2019.
- <sup>4</sup> Biosis 2016, Golden Sun Moth Survey Report, Commonwealth Avenue (EPBC Referral 2019/8449).
- <sup>5</sup> SMEC 2017, Commonwealth Avenue Golden Sun Moth Survey, prepared for Land Development Agency (EPBC Referral 2019/8449)
- <sup>6</sup> SMEC 2018, Vegetation, Habitat Assessment and Golden Sun Moth survey at City Hill (EPBC Referral 2019/8449)
- <sup>7</sup> Biosis 2019, City to Commonwealth Park Preliminary Environmental Assessment: Biodiversity, Draft Report Prepared for Transport Canberra and City Services, 14 June 2019.
- <sup>8</sup> Australian Heritage Commission 2002, *Australian Natural Heritage Charter for the conservation of places of natural heritage significance*, 2nd Edition, Environment Australia, Canberra.