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CAMPBELL BLOCKS 4 AND 5 SECTION 38

Flora and Fauna

The initial public notification did not include all studies re flora and fauna values of the site and despite additional information being provided late in the consultation process there remains concern about adequate detail, assessment and what other information is still to be provided.

Demolition

We note the DA is for demolition, yet demolition has already started with the removal of copper and some equipment. This action needs to be prevented and unauthorised actions considered in assessing the Works Approval.

Significance

The GML Heritage Assessment Clause 3.2 clearly indicates that the site meets criteria a), d) and h) which is sufficient to include it on the Commonwealth Heritage List and/or the ACT Heritage Register. The significance is defined in Section 3.3.

Any action to demolish is contrary to protect the heritage values of the site and should not be permitted.

Purdon Report

The report is misleading as the EPBC Act is triggered (Clause 4.2) as the building has heritage value as identified in the GML Heritage Assessments.

The flora and fauna values also need further clarification and may also trigger a referral.

The comments in Section 6.2 are also misleading as the building has heritage value and there is no substantive discussion as to why they should be demolished and the impact on the heritage values if they were considered for demolition.

It is not logical that demolition of a building of significance will not adversely impact its heritage values.

Conclusion

The works approval for demolition cannot be supported given the heritage values of the building.

Penalties should apply as demolition has begun pre-approval.

Yours sincerely

Eric Martin AM