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PATRON: The Hon Margaret Reid AO

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## Raising of London Circuit

The National Trust of Australia (ACT) ('the Trust') welcomes the opportunity to make a submission on the proposed works for Raising London Circuit. The Trust's purpose is to promote the conservation of, and foster public knowledge about, places, objects and issues that are significant to the heritage of the Australian Capital Territory.

The Trust wishes to comment on several matters of concern.

Firstly, the Trust notes the impact of the works on the habitat of the endangered Golden Sun Moth, species *Synemon plana*, and the intent to translocate species larvae from within the construction footprint to another location. However, the documentation does not state that an alternate location for the species has been identified, or that a Golden Sun Moth Construction Environmental Management and Rehabilitation Plan has been written, and approved by, the Federal Minister as required by the EPBC Act Referrals decision for Light Rail Stage 2A.

The Trust believes that no work should commence on this project until an alternate site for the Golden Sun Moth has been identified and agreed, and the Golden Sun Moth Construction Environmental Management and Rehabilitation Plan has been written and approved by the Federal Minister.

Secondly, the Trust is concerned about the impact of the project on the views to and from City Hill along Commonwealth Avenue. As stated in Appendix B, City Hill is a registered place on the ACT Heritage Register and the appendix notes 'the importance of the view from City Hill towards Commonwealth Avenue Bridge, amongst others' (Appendix B – Heritage Impact Assessment – page 27).

The analysis in appendix G regarding viewpoints 2 and 7 suggests a beneficial assessment of the works, stating that improvements, particularly with street trees, will improve the view. However, the analysis does not consider the impact of traffic queues, or traffic starting and stopping, along Commonwealth Avenue. The Trust believes that the changed nature of the traffic flow in the proximity of City Hill will negatively distract from the views to and from City Hill.

Finally, and significantly, there appears no sensible or rational reason to raise London Circuit except to facilitate Stage 2 of the Light Rail 2. The separation of various packages or work under different guises is a concern when there is no overall plan or agreement to Stage 2 or the potential development in the Acton area. Both these have potential to have major heritage impacts. The whole planning vision for the area and detailed implications should be prepared and agreed before any of the individual items such as raising London Circuit are implemented.

It is also disappointing that infrastructure work relating to services has already commenced on the assumption that raising London Circuit is necessary and will be approved. This approach is contrary to any serious consultation process for a proposed action which is meant to occur and issues considered before action is taken.