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**Re: Yarralumla Residents Association Submission – Response to the Invitation for Public Comment on the draft Heritage Management Plan for the CSIRO Yarralumla site**

Thank you for the opportunity to comment on the draft Yarralumla Heritage Management Plan.

The area covered by the plan covers a very substantial area of land in Yarralumla – 12.85 hectares. It is located on major suburban streets and changes in its possible use are arguably as significant as the adaptive re-use planning for the Canberra Brickworks Redevelopment.

Given this context, and the YRA’s long experience in working on local heritage and conservation issues, we would hope that the possible changes in use are undertaken in full consultation with the community. The recent experiences with the Community Panel on the Brickworks is a possible example of successful collaboration.

As noted in the plan, the greatest risk to the heritage values of the area is a change of ownership and/or control (p90 of the draft). This is given the highest risk rating of a 5, based around the high likelihood of it occurring and high consequences of inadequate management actions.

The mitigation management strategy included in the plan to deal with this highest risk is considered inadequate. Specifically, the following action is considered clearly insufficient to move the risk rating to only a “Low”:

*“If a change of ownership that would remove the study area from protection under the EPBC Act is to occur, at least 12 months prior to divestment, nominate the assessed values to the ACT Heritage Register and liaise with the ACT Heritage Council to ensure protection will be in place upon sale transaction.” (p90).*

There are risks with such a limited set of actions.

According to the reports own criteria (p88) any risk category 5 means “Immediate management action required”.

Moving out of the protection of the EPBC Act has potentially substantial implications. The assumption that it could all be completed with a time frame of 12 months from divestment is, at best, optimistic.

As noted in the draft plan, such divestment is regarded as having a “high likelihood”. This is consistent with some commentary in the media, and comments from those associated with the site. Indeed, there are views that some specific pathways are already being chosen which require the CSIRO to return parts of the site to their “natural state” before any divestment occurs. This would involve demolition of many buildings - certainly those without a specific heritage listing.

Some clarification of the current state of the twenty year 2002 lease between the Gunyar Pty Ltd and the CSIRO would be welcome. The YRA would be happy to meet with relevant representatives to better understand likely options for the site. This would provide a much stronger context for considering appropriate heritage and conservation actions.

Looking through the draft plan, there are seven primary concerns about which further consultation would be appreciated:

1. The highly likely transfer of the site away from the Commonwealth’s Environment Protection and Biodiversity Act. Simply moving a number of the specific site assets onto the ACT Heritage Register would not provide the same level of protections as currently provided. The risks of such a transfer need much stronger explanation to engender trust in the community.
2. The current draft plan takes a piecemeal rather than a holistic view of the site. This is particularly the case as one of the two Commonwealth listings (105595) is for “The CSIRO Forestry Precinct”. The current description of the 2004 listing is *“It is a complex of buildings, arboretum, nursery, and tennis courts forming an important national scientific institution, established as a response to Federation to provide a national forestry school and national forest research centre. It demonstrates both the Commonwealth's interest in scientific endeavour and a vision for Canberra as the location for science as well as general government administration.”* p134. The heritage listing goes on to state *“The precinct is important for its array of features from different phases of development linked to the scientific and educational purpose of the site. These features include the former Australian Forestry School, the former Offices of the Forestry and Timber Bureau, the former Seed Storage Building, Forestry House and Caretakers Cottage, the CSIRO Divisional Headquarters, Controlled Environment Laboratory, tennis courts, arboretum plantings and moveable objects of furniture, collections and historic timber hauling vehicles.”* The important element here is the fact that it is a precinct – there is an array of features where the value of the whole precinct is greater than just the sum of its parts. There is no clear path forward for maintaining the heritage and conservation elements of the precinct as whole.

3. The current draft plan does not do enough to update changes since the 2008 heritage and conservation plans. For example, there is no discussion of the Pyrotron facility that has been used to test models of bushfire behaviour. Indeed, the long history of the site in dealing with bushfire controls is understated, especially given the impact of bushfires in Canberra.
4. Although the oval areas have been removed from the CSIRO lease, they are intrinsic to the integrity of the site as a former forestry school. There is a need for at least a discussion how any developments on the CSIRO lease will impact on the oval area, and vice versa.
5. The plan also appears to fail to cover adequately elements of the site other than buildings.
  - i. For example, there is a small part with three original remnants of forestry activity – a logging whim, a log tram running on wooden rails, and a log buggy. These would appear to be significant remnants dating from the late 1800s to early 1900s. The heritage value would be useful to consider, especially as they appear to be suffering badly from their current exposure to the elements.
  - ii. Additionally, the value of trees in the area receive no specific mention in the assessment of site values. It is likely that some of them were planted by Charles Weston or other notable foresters from the area.
  - iii. Even though there are references to tree protection in the management plan including replacement of like with like, there clearly are parts of the site where some significant trees have been removed and there is no clear action to replace them (such as the removal of 10 large pines in front of the Australian Forestry School – to the right when looking from Banks Street).
6. The draft plan is also clear that it has not sought to obtain further information on the possible indigenous values on the site.
7. The 2008 studies covered both a Heritage Plan as well as a Conservation Plan. It would be useful to gain specific assurances that the current plan incorporates all relevant conservation elements, including issues around landscapes, flora and fauna.

We would welcome the opportunity to discuss the implications of the “highly likely” transfer of the CSIRO lease to Gunyar Pty Ltd as some planning actions appear to already be underway.

Yours sincerely

David Harvey  
President

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