



27

Tasmanian Heritage Council
GPO Box 618 Hobart Tasmania 7001
6/134 Macquarie St, Hobart Tasmania 7001
Tel: 1300 850 332 or [03] 6233 2037
Fax: [03] 6233 3186
enquiries@heritage.tas.gov.au
www.heritage.tas.gov.au

7 September 2006

Mr Julian Green
Executive Commissioner
Resource Planning and Development Commission
GPO Box 1691
HOBART TAS 7001

REF: 109151-02HC

Dear Mr Green

RE: Gunns Limited – Proposed Bleached Kraft Pulp Mill at Long Reach, Northern Tasmania – Project of State Significance

Thank you for your letter of 13 July 2006, inviting the Tasmanian Heritage Council to comment on Gunns' Draft Integrated Impact Statement (IIS). The Heritage Council has asked me to respond to your request.

The Draft IIS has identified new historic heritage sites that were not previously recorded, and implements a management regime for avoiding places of heritage significance. This is sound conservation practice.

I also understand that the identified sites of significance at the Mill site will be protected by the Reserve and a Cultural Heritage Management Plan for these sites will be provided to Heritage Tasmania for comment. The proposed Mitigation Management Frameworks are also acceptable responses for dealing with individual sites, and the potential discovery of new sites of historic heritage significance.

The Heritage Council has doubts and concerns regarding the methodology used in assessing the significance of the sites, and the level of documentation given to these sites. Nonetheless, it is acknowledged that the Draft IIS proposes avoiding impacting on sites of significance and this is appropriate.

With regards to your request for submissions specifically related to statutory responsibilities, I have provided more detailed information in Appendix A, including a comparison with the Draft Scope Guidelines. Three places of heritage significance were not included in the Draft IIS, and it would be appropriate for the Draft IIS to provide further information on whether there will be any impacts on these places.

The Heritage Council's comments are made on the consideration of the proposal in the Draft IIS. Any deviation from the proposed construction may impact on other places of historic heritage significance. In such case, it would be desirable they liaise with the Heritage Council or myself according to need. If required, I would be happy to provide further information.

Yours sincerely

Michael Lynch
Chairperson

Appendix A

Tasmanian Heritage Council Comments on the Draft IIS and Comparison with Draft Scope Guidelines

Volume/ Report	Section	Page	Comment
Draft Scope Guidelines	17.10.10	74	The proposed effluent pipeline travels near the North East boundary of the George Town Cemetery, Cemetery Road, George Town (THR: 1447, PID 6436518). This place is permanently entered in the Tasmanian Heritage Register. The Draft IIS has not clearly identified this place and whether the pipeline is adjacent to, or crosses the boundaries of the cemetery. The Draft IIS should include any potential impacts on this place to determine if any approvals by the Heritage Council are required. The place is also entered in the Register of the National Estate (ID 12617).
Draft Scope Guidelines	17.10.10	74	The proposed water pipeline crosses the property boundaries of Burnside Barn, Flour Mill, 1672 East Tamar Highway, Dilston (THR: 4117, PID: 6710820). The Draft IIS has not clearly identified any potential impacts on this place. This place is not entered in the Tasmanian Heritage Register, although an application for its entry has been received and will be considered in due course. Approval of the Heritage Council is not required at this point in time, however Heritage Tasmania should be consulted with on any likely impacts of the pipeline prior to works commencing. The place is also entered in the Register of the National Estate (ID 12642).
Draft Scope Guidelines	17.10.10	74	The proposed water pipeline appears to cross the property boundaries of Landfall and Cottage, RA 781 East Tamar Highway, Dilston (THR: 4116, PID: 7710697, CT: 141733/1). This place is permanently entered in the Tasmanian Heritage Register. The Draft IIS has not clearly identified this place and whether the pipeline is adjacent to, or crosses the boundaries of Landfall. The Draft IIS has not clearly identified any potential impacts on this place to determine if any approvals by the Heritage Council are required. The place is also entered in the Register of the National Estate (ID 12640).
Draft IIS Vol. 2	2.17	166-170	Volume 2 refers to the visual amenity of the proposed work area. A 1994 report by de Gryse is cited and analysis made of factors such as landscape characteristics, scenic value, and defining the visual value. Some consideration has been given to cultural impacts on the landscape, for example, in the industrial areas. Volume 3 (pp.138-149) provides a closer analysis of the cultural landscape of the area by reference to the identified historic sites. In light of these two studies, the Draft IIS may benefit from a synthesis of the findings to be made. This may broaden the landscape assessment in volume 2 beyond the visual amenity of the area. However, the <i>Historic Cultural Heritage Act 1995</i> does not require this to be undertaken as an approval requirement.
Draft IIS Vol. 2	2.18.8	187-195	The majority of the sites identified through the heritage surveys are outside the proposed development areas. However, the methodology and preliminary assessment of significance is based on a model not used or endorsed by the Heritage Council. In part, the Draft IIS concludes that a

			site of low or minimal significance may be given this rating if it is not well, or is very poorly preserved. Although the integrity of a site should be considered as part of the assessment of significance, it should not be determinative. A site that has a low level of integrity may still have a high level of significance. Given that there is little specific historical documentation in the reports related to the individual sites, undue weight should not be given to the integrity of specific sites in determining their significance.
Draft IIS Vol. 2	2.18.8	191	The Draft IIS states that no site identified are relevant to the statutory protective mechanisms of heritage registers, including the Tasmanian Heritage Register. The Heritage Council may enter a place in the Heritage Register where it meets one or more of the criteria for entry in s16 of the <i>Historic Cultural Heritage Act 1995</i> . Given that none of the sites have been assessed against the criteria in the Act, this conclusion is not supported.
Draft IIS Vol. 2	4.18	449	The site of the Big Bay Stone Fence (site 12B) is determined to have high significance and will be protected from all impacts. A 10m buffer zone will be implemented. The Draft IIS should detail how this buffer zone was established to determine its adequacy.
Draft IIS Vol. 4	3.4.10	80	The Big Bay Stone Piles (site 4B) and the Big Bay House Site (3B) are determined to have medium and high significance respectively and will be protected from all impacts. 10m buffer zones will be implemented. The Draft IIS should detail how these buffer zones were established to determine their adequacy.