



10 July 2017

West Gate Tunnel Project  
Western Distributor Authority  
Department of Environment, Land, Water and Planning  
PO Box 500  
East Melbourne VIC 8002

Tasma Terrace  
4 Parliament Place  
East Melbourne  
Victoria 3002

Email: [info@nattrust.com.au](mailto:info@nattrust.com.au)  
Web: [www.nationaltrust.org.au](http://www.nationaltrust.org.au)

T 03 9656 9800  
F 03 9656 5397

**Re: West Gate Tunnel Project**

Dear Sir/Madam

Thank you for the opportunity to provide comment regarding the West Gate Tunnel Project (WGTP). The National Trust of Australia (Victoria) (NTAV) has concerns about a number of elements of the project including:

- Loss of green infrastructure across the project
- Size, scale and visual impact of the southern and northern portals and ventilation structures
- Impact on natural heritage values at Stony Creek, Hyde Park Reserve and Moonee Ponds Creek
- Visual and physical impact on Yarraville Gardens
- Substantial and dominating bridge crossing of the Maribyrnong River

**Tree removal**

Substantial green infrastructure is proposed to be removed across entire footprint of the project with an estimated 3,347 trees degraded or removed, including 2,954 medium to long term viability trees (documented in Technical report F Ecology). This represents a considerable loss of the amenity, visual and heritage value of trees in addition to a significant loss of carbon sequestered by mature trees. NTAV expects that tree removal would be minimised and mitigated through sensitive detailed design and construction methodology. Should tree removal be unavoidable, detailed plans for landscape reinstatement works should be undertaken in consultation with the relevant local council. This should include the use of advanced trees as part of such works, timely reinstatement of trees during phased works rather than at the completion of the project and strategies for subsequent management. Amelioration works ensuring the quality and volume of soil as well as irrigation must also be taken into account, particularly when reinstatement takes place on temporary work sites or industrial land. Tree reinstatement and offset planting should take into account the amenity, shade and heritage value of canopy trees to local residents. Such work should therefore be undertaken to benefit such residents, rather than offset elsewhere in the project.

**West Gate Freeway component**

**Westbound Southern Portal**

NTAV notes that the westbound southern portal and ventilation structure is a substantial built structure, with a height in excess of 50m. The scale and height of this portal will form a significant landmark dominating the surrounding landscape, which includes the Bradmill industrial site (HO125, Maribyrnong City Council) and residential development. The context of the Bradmill industrial site will be impacted with the portal structure dominating the boiler house building in height and scale.

NTAV submits that the sitting and scale of the portal structure should be reconsidered, taking into account the heritage values of the Bradmill industrial site, as well as the surrounding residential setting. Landscaping works in adjoining land will not sufficiently mitigate the impact of this structure on the surrounding landscape and the landmark status of the Bradmill boiler house.

### **Stony Creek**

The environmental values of the Stony Creek and the Hyde Street reserve will be impacted by the off-ramp connecting the West Gate Freeway to Hyde Street proposed by the WGTP. The construction of the off-ramp and its associated piers are considered to impact the flow and hydrology of Stony Creek and its associated vegetation. Community connection to the Stony Creek and Hyde Street reserve should be taken into account, including work by the Friends of Stony Creek to rehabilitate native vegetation since the construction of the West Gate Freeway. NTAV submits that further consideration should be given to the alternatives documented in 3.8 of Volume 1 – West Gate Tunnel Project, particularly those with no direct impact on the Stony Creek and Hyde Street Reserve. This is important in order to maintain the environmental and community values of this landscape. If alternatives are not viable, detailed design should mitigate environmental impacts and landscaping reinstatement works should be responsive to and improve upon the current environmental conditions. Such landscaping work should be planned and undertaken in consultation with the Friends of Stony Creek.

### **Tunnel component**

#### **Yarraville Gardens Precinct (HO138 Maribyrnong City Council)**

NTAV has concerns regarding impacts on the Yarraville Gardens including tree removal, groundwater drawdown and extent of nearby built infrastructure associated with the WGTP. The Yarraville Gardens are locally significant as the earliest surviving public garden in the municipality and contain a significant collection of mature trees.

#### **Shared path along Harris Street**

The construction of a shared pedestrian/bicycle path along Harris Street at the northern end of the Yarraville Gardens (Hanmer Reserve) proposes to remove a series of mature trees. These include three *Cupressus torulosa* (Bhutan Cypress), two *Cupressus macrocarpa* (Monterey Cypress), a *Phoenix canariensis* (Canary Island Date Palm), a *Washingtonia robusta* (Cotton Palm), two *Lophospermum confertus* (Brush Box) and a *Grevillea robusta* (Silky Oak). It is noted that the Canary Island Date Palm forms part of a row that is a significant feature of the gardens. All of these trees contribute to the character of the garden as a whole, and their loss would impact on its significance. Furthermore, the raised structure of this path and its crossing of Whitehall Street present a visual intrusion into the Yarraville Gardens. It is not clear from the EES documentation to what extent this structure will impact the broad context of the Yarraville gardens, particularly views toward the north-east. The artist impression of this bridge (page 71, Development and Urban Design Plans Attachment 2 Tunnels) presents the large extent of built infrastructure in close proximity to the Yarraville Gardens northern boundary. NTAV submits that the siting and design of this shared path and bridge across Whitehall Street should be resolved through detailed design that avoids or mitigates tree removal as well as taking into account the broader visual impact on the Yarraville Gardens. Alternative locations for this path—which avoid the removal of significant trees and reduce visual impacts on the gardens—should also be considered, such as on the northern side of Harris Street.

#### **Groundwater draw down**

NTAV submits that any impact or change in the hydrology of soil and groundwater within the Yarraville Gardens should be mitigated in detailed design and adequately monitored throughout the

WGTP, including any required remediation works, to ensure the ongoing health and availability of water to significant trees within the Yarraville Gardens.

### **Northern portal and associated infrastructure**

The northern portal and ventilation structure is a substantial built structure that is in excess of 50m in height and 200m in length. The northern portal will be a dominating and prominent feature not only in views from the Yarraville Gardens but across this suburban landscape. It is located within 100m of the north-eastern boundary of the Yarraville Gardens, with the addition of a proposed Freeway Maintenance Building in between. This will see the north-eastern side of Yarraville Gardens essentially enclosed by built infrastructure, detracting from the natural heritage values and amenity of the garden. NTAV submits that the combined visual impact of the portal, raised shared path and associated freeway infrastructure on the Yarraville Gardens will have a significant impact on the heritage values of the gardens. This impact is made more problematic given the scarcity of such values elsewhere in the municipality. NTAV submits that the intrusion of built infrastructure on the visual context of the garden should be mitigated by detailed design that reduces the scale and footprint of the northern portal, taking into account views from the Yarraville Gardens at ground level. If possible, alternative siting should also be considered for the proposed Freeway Maintenance Building, reducing the footprint of built infrastructure within the immediate context of the Yarraville Gardens.

### **Port, CityLink and city connections**

#### **Maribyrnong River crossing**

NTAV submits that the WGTP proposed Maribyrnong River crossing adversely impacts upon the heritage significance and context of the Maribyrnong River, including view-lines and the associations of built heritage with the river environment. The architecture of the three bridges proposed to cross the river is substantial, dominating the urban environment. Associations of the urban environment with the river as an important landscape feature will be compromised as a result. The height of the bridges ranges from 7-11m, which forms an imposing built structure, particularly when viewed from ground level. As such, view-lines across and along the river from ground level, particularly those from the Maribyrnong River Trail and from the north, will be blocked by the bridges. Furthermore the height and scale of these bridges has an impact the river association and built context of several heritage buildings on the west side of the river. These buildings include the Barnett Glass Rubber factory (HO78, Maribyrnong City Council) and the Mowling's Soap & Candle works (HO178, Maribyrnong City Council). The context of these buildings in relation to the Maribyrnong River and the surrounding urban environment will be permanently disrupted by the proposed bridges which overshadow the scale of these buildings. We submit this would have an unreasonable impact on the Maribyrnong River context, view-lines and historical connections to the development of the city, and that detailed design and siting for these bridges should be reconsidered to mitigate these concerns, and in so doing be more responsive to the significance of the river environment.

#### **Widening of CityLink crossing of Moonee Ponds Creek**

The WGTP proposes to widen the CityLink crossing of Moonee Ponds Creek, with the addition of new on and off ramps. The ecological value of the Moonee Ponds Creek corridor will be compromised by this extended structure which will see more of this section of the creek under permanent shade, impacting on the natural heritage values of the site. While recognising that existing infrastructure already exists across the Moonee Ponds Creek, NTAV has concerns regarding this additional infrastructure which will impact on the City of Melbourne's intentions to rejuvenate its ecological values in the future.

## Conclusion

The NTAV's primary concern regarding this project is the impact to natural heritage due to widespread losses of healthy mature trees, long term impacts on native vegetation, particularly within the waterways and environs of Moonee Ponds Creek and Stony Creek. We also have significant concerns regarding the impact of built infrastructure on identified cultural heritage places. The EES documentation contains alternatives for the Hyde Street ramp across Stony Creek and NTAV advocates for these options to be pursued. For the Yarraville Gardens the dominating visual impact of the northern portal, ventilation structure and associated built infrastructure such as the shared path overbridge should be mitigated to maintain an appropriate context for the natural heritage values of the site. Likewise the southern portal and ventilation structure and its dominance should be reconsidered to account for the surrounding landscape and Bradmill boiler house context. Dominating built structure in the crossing of the Maribyrnong River should similarly be mitigated with an architectural response to the river environment and its historical connections to the surrounding urban landscape.

Thank you for the opportunity to make a submission regarding the EES documents.  
Should you have any queries regarding the above, I can be contacted on 03 9656 9823.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Jessica Hood', written in a cursive style.

Jessica Hood  
Community Advocate Environmental Heritage