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**National Trust of Australia (Victoria) submission**

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**West Gate Tunnel Project Inquiry and Advisory Committee**

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Thank you for the opportunity to provide comment regarding the West Gate Tunnel Project (WGTP). We understand that heritage is but one factor that will constrain the WGTP design and construction. The National Trust of Australia (Victoria) (NTAV) has put together this submission in consultation with our expert Significant Tree Committee, and has concerns about a number of elements of the project including:

- Aboriginal cultural heritage design response
- Loss of green infrastructure
- Size, scale and visual impact of the southern and northern portals and ventilation structures
- Impact on environmental heritage values at Stony Creek, Hyde Park Reserve and Moonee Ponds Creek
- Visual and physical impact on Yarraville Gardens and Footscray Road
- Substantial and dominating bridge crossing of the Maribyrnong River

## **1 DESIGN RESPONSE**

The NTAV would like to raise serious concerns regarding the extent of engagement with Traditional Owner Groups in local areas, particularly with regard to use of design motifs that reference Aboriginal cultural heritage. We note that Chapter 6, page 6-8 of the Environment Effects Statement Main Report Volume 1 states, “a key and underpinning reference that informs the whole of the urban design approach is a strong connection with Victorian Aboriginal culture” concluding that “further detailed consultation with local Traditional Owner Groups would be undertaken during detailed design development to ensure the concept is culturally authentic, sensitive and appropriate”. NTAV notes that the EPR, Urban design approach LVP1, does not stipulate this and we recommend this is altered to reflect this requirement. Although the EPR LVP1 states that detailed design must respond to the WGTP urban design principles and vision, we note that these principles and vision do not make overt mention of Aboriginal culture, Aboriginal cultural design elements or local Traditional Owner Group consultation, where they could usefully be included, in addition to the Key considerations under Chapter 6 of the EES report. We note that the Urban design references (page 6-10) and in Mr Woods expert evidence the “Victorian Aboriginal design references” are given

as a set of images of eel and fishing nets, traps and a bark canoe, none of which originate in a local Traditional Owner Group, which raises concern as to the extent of meaningful engagement with local Traditional Owner Groups at earlier stages of the project. We suggest engaging an organisation such as Indigenous Architecture and Design Victoria to provide expert advice regarding the design of the project and appropriate consultation. The project also represents an opportunity to move beyond symbolic recognition through design to create meaningful outcomes for Aboriginal Victorians through employment opportunities in both the design and construction phases of the project.

## **2 HERITAGE INTERPRETATION STRATEGY**

The Environmental Performance Requirement CHP7, Heritage interpretation strategy, states a requirement for developing and implementing a heritage interpretation strategy for the project that explores historical and Aboriginal cultural heritage themes. We strongly support the inclusion of this EPR. However we note that the EPR states: “The strategy may include installation of signage regarding local heritage places...” (page 8-27, Volume 1 West Gate Tunnel Project). The on-the-ground implementation of this strategy is of utmost importance, and we therefore recommend that responsibility for installation of such signage is assigned to a relevant authority. We recommend that either the wording of this EPR is changed to “The strategy must include installation” or provide assurances that the relevant authority has been consulted and has agreed to be able to implement such a plan. Consideration to the project phase, particularly the ability to install such signs during and possibly at the conclusion of construction should also be considered. Furthermore, NTAV recommends an inclusion in the EPR CHP7, that Traditional Owner Groups are consulted and meaningfully engaged in the development of the interpretation strategy.

## **3 TREE REMOVAL**

We have serious concerns regarding the substantial green infrastructure is proposed to be removed across the 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. Our National Trust expert Significant Tree Committee notes that the west of Melbourne already currently experiences low canopy tree cover, relative to other suburbs in proximity to Melbourne CBD. Despite the WGTP proposed tree replacement and offset, the significant loss of trees at this scale, especially trees of 30-50 years cannot be underestimated. The expected minimum time for replacement of amenity

and heritage value to the community from advanced tree replacement works of this scale would be 20 years, in addition to the significant loss of carbon sequestered by mature trees removed. We would expect that many of these trees to be removed would have a useful life expectancy of greater than 50 years and many in excess of 100 years. There are key factors regarding the value of trees to be considered in an urban environment, including amenity and shade provided by these trees, many of which are medium to long term viability trees, already providing such benefits. Our expert Significant Tree Committee advises us that the average amenity provided by these trees would have an average monetary value of \$2000-\$5000 each, depending on age, size and condition with some worth much more. This would equate the removal of tree assets across the project to be at a value of between \$7 and \$17.5 million.

NTAV expects that tree removal would be minimised and mitigated through sensitive detailed design and construction methodology. Should tree removal be documented to be completely unavoidable, detailed plans for landscape reinstatement works should be undertaken in consultation with the relevant local councils. 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.

#### **4 WEST GATE FREEWAY COMPONENT**

##### **4.1 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. The context of the Bradmill industrial site (HO125, Maribyrnong City Council) will be impacted with the portal structure dominating the boiler house building in height and scale. NTAV submits that the citing 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.

## **4.2 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. 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. 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 supports the position of the City of Maribyrnong and the Friends of Stony Creek, that appropriate consultation with the Stony Creek Direction Plan 2011 is undertaken by the WGTP. Furthermore we support Ms Bauer’s expert evidence (page 46) that the “design of Stony Creek reserve should be undertaken in full consultation and collaboration with the City of Maribyrnong, Melbourne Water and other stakeholders.”

## **5 TUNNEL COMPONENT**

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

NTAV has serious 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. The gardens are highly valued by the local community, who as noted earlier, already experience low canopy tree cover across their suburbs. There are similarities to be made between the Yarraville Gardens and nearby Footscray Park which is on the Victorian Heritage Register. Notably David Matthews, Superintendent of Parks and Gardens from 1916 until 1964 was responsible for the implementation of tree planting at both gardens.

#### **5.1.1 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 *Lophosemum confertus* (Brush Box) and a *Grevilleae 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 and that it would be possible to lift and replant this and the Cotton palm tree. In the experience of the National Trust’s

expert Significant Tree Committee, there is a success rate of approximately 50% where palms are reinstated after public works programs. All of these trees contribute to the character of the garden as a whole, and their loss would impact on its significance. As such we submit that no tree removals should be undertaken at this location.

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 citing 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 reduces visual impacts on the gardens—should also be considered, such as on the northern side of Harris Street.

### **5.1.2 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.

### **5.1.3 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. We support Ms Bauer's evidence that the Northern Portal will have a high level of impact on the Yarraville Gardens (page 52 Expert Witness Statement). 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 environmental heritage values and amenity of the garden. NTAV submits that the combined visual impact of the portal, raised shared path and associated freeway infrastructure will have a significant impact on the heritage values of the Yarraville 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 and proposed Freeway Maintenance Building, taking into account the experience of the Yarraville Gardens at ground level.

## **6 PORT, CITYLINK AND CITY CONNECTIONS**

### **6.1 Maribyrnong River crossing**

We submit that proposed WGTP bridges crossing the Maribyrnong River would have an unreasonable impact on the built and environmental heritage significance of the Maribyrnong River, its context, view-lines and historical connections to the development of the city. The architecture of the three bridges 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 7-17.5m, which forms an imposing built structure, particularly when viewed from ground level. In line with Ms Bauer's evidence, we submit that that the visual impact on view-lines across, and along the river, from ground or river level, particularly public open spaces, and views from the north should be taken into account (page 21 Expert Witness Statement). Furthermore we submit that the height and scale of these bridges impacts 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.

In line with Mr Schutt's evidence we recommend that alternative design and citing for these bridges should be considered to mitigate these concerns, and in so doing be more responsive to the significance of the river environment. We agree with Ms Bauer's statement that the bridge design "should be of nationally significant design quality, befitting the significance of the river and the existing and future urban realm" (page 21 Statement of landscape and open space evidence). The NTAV supports the recommendation made in the conclave Joint Statement – Architecture, Urban Design and Landscape, that the Maribyrnong River crossing infrastructure option "does not satisfactorily respond to the significance of the river and adjacent land use" and that the "ramps and bridges are too low compromising the river environment". We agree with the recommendation from an urban design viewpoint that, in order of preference, the tunnel is extended further east to a more appropriate location or that the ramps are removed altogether.

## 6.2 Footscray Road

The project proposes twin elevated road structures above Footscray Road between the Maribyrnong River and the existing intersection of Footscray Road and Appleton Dock Road. We have heard and read Mr Schutt's evidence on landscape and open space. Currently Footscray Road is a boulevard with dual lanes in either direction and a service lane on the northern side. The road consists of three distinct rows of canopy trees, mainly Eucalypt species with some exotic trees, planted at regular intervals between lanes in each direction. As with Mr Schutt's assessment of these trees their height varies between 5 and 15 metres (page 6-7, Statement of landscape and open space evidence) and they are "mature, native canopy trees...and provide a positive contribution to the 'boulevard' character of this roadway" (page 36). We note that the significance of Footscray Road as a tree lined boulevard in an industrial area should be valued. The canopy trees that line either side of the road provide a welcome visual buffer between the road and the adjoining industrial land uses. As such the continuity of tree planting along Footscray Road is significant as providing a green and leafy gateway to Melbourne's west. This is a new boulevard to be compared and contrasted with the great 19<sup>th</sup> century boulevards of Melbourne, such as St Kilda Road and Royal Parade. Although the boulevard character of Footscray Road has suffered some degradation since its initiation in the early 1960s, the current trees are in excellent condition and have the potential in the next 20 to 30 years to mature into significant canopy trees with high aesthetic values and wide canopy spreads, further enhancing its boulevard character comparable to Melbourne's significant 19<sup>th</sup> century boulevards.

The WGTP proposal for a twin elevated road structure along the Footscray Road corridor would see the removal of all trees down the central median of Footscray Road, as well as possible tree removal on the southern side, as stated in Mr Schutt's evidence. This will see a substantial visual impact on the experience of Footscray Road for motorists and shared path users alike. We agree with Mr Schutt's evidence on page 36 that "the removal of the central avenue of trees...will fundamentally alter the amenity of the roadway corridor, by replacing a natural, vegetative canopy with a solid, bulky and impenetrable overhead structure". We submit that the community's appreciation of the heritage significance and amenity value of these trees should be considered by the IAC. In line with Mr Schutt's expert evidence we submit that the residual visual impact of the elevated road over Footscray Road with its associated tree removal, should be assessed as High. We do not expect that proposed works can reinstate this current boulevard to an equal or improved landscape characteristic, with large canopy trees at regular intervals. As such NTAV submits that this proposal would have an unacceptable detrimental impact on the values of Footscray Road. We do not consider that additional tree planting on the southern side of the road, as proposed by the project would sufficiently mitigate the adverse effect of an elevated road structure at this location and as

such we support Mr Schutt's statement on page 15 that alternatives to an elevated road structure should be considered at this location.

### **6.3 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 environmental heritage values of the site. While recognising that existing infrastructure already exists across the Moonee Ponds Creek, NTAV has concerns regarding this additional infrastructure and as such support the recommendation of the conclave Joint Statement – Architecture, Urban Design and Landscape that the existing conditions and future ambitions of the Moonee Ponds Creek should not be compromised and as such, in order of preference, the Dynon Road connection is removed, or alternatives to the Wurundjeri Way extension are considered.

### **6.4 Railway turntables, South Dynon**

We have read and heard the expert evidence of Ms Kate Grey regarding the Railway turntables at South Dynon. In the opinion of Ms Grey, these turntables are of local historical significance, as “uncommon examples of their types in the metropolitan context and as associated with the long history of this particular area for rail use” (page 126, EES Technical Report P Historical Heritage, Lovell Chen, May 2017). We submit that consideration be given to the significance of the metropolitan location of these turntables, and that as such these turntables be maintained in-situ, in line with Ms Grey's evidence which stated that the alignment of the local road in detailed design can respond to the current turntable location. We recommend that EPR ECHP11 is amended to reflect the preference to, through detailed design, retain the turntables in-situ.

## **7 CONCLUSION**

The NTAV's primary concern regarding this project is the impact to natural heritage due to widespread removal of healthy mature trees, representing a considerable loss of the amenity, visual and heritage values of trees in the west which should not be underestimated given that the west of Melbourne currently experiences low canopy tree cover. The expected minimum time for replacement of amenity and heritage value to the community from advanced tree replacement works of this scale would be 20 years, in addition to the significant loss of carbon sequestered by mature trees removed. The boulevard character of Footscray Road, with large, attractive canopy tree cover should be maintained and we recommend that alternatives to the elevated road at this



location be investigated. Given the environmental significance of the Stony Creek and Moonee Ponds Creek we advocate for options that best protect and enhance the existing conditions are investigated. We also have significant concerns regarding the impact of new built infrastructure associated with the WGTP on the identified cultural heritage places of Yarraville Gardens, Bradmill Industrial Site and the Maribyrnong River. For the Yarraville Gardens the dominating visual impact of the northern portal, ventilation structure and associated built infrastructure should be mitigated to maintain an appropriate context for the environmental heritage values of the site, particularly as experienced from the ground. The dominating built structure in the crossing of the Maribyrnong River should similarly be reconsidered, with either the tunnel extended further east to a more appropriate location or that the ramps are removed altogether, creating an an architectural response to the river environment and its historical connections to the surrounding urban landscape. The Railway turntables at South Dynon should be retained in-situ as a preference to removal. Furthermore, we recommend that EPR's reflect the need for meaningful Traditional Owner Group engagement in the interpretation strategy and urban design elements of the WGTP.

Thank you for the opportunity to make a submission regarding the EES documents. Should you have any questions 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