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**Re: Public exhibition of Melbourne Metro Project Early Works Plan and Precinct Development Plans**

**1 Introduction**

The National Trust of Australia (Victoria) is state's largest community-based heritage advocacy organisation actively working towards conserving and protecting our heritage for future generations to enjoy, representing 28,000 members across Victoria. The National Trust's vision is that 'our diverse heritage is protected and respected, contributing to strong, vibrant and prosperous communities', and our mission to 'inspire the community to appreciate, conserve and celebrate its diverse natural, cultural, social and Indigenous heritage'.

The National Trust has made numerous submissions regarding the Melbourne Metro Rail Project, including submissions to the Melbourne Metro Rail Project Inquiry and Advisory Committee on the Environmental Effects Statement. We also recently had the opportunity to meet with the Melbourne Metro Rail Authority (MMRA) and Cross Yarra Partnership (CYP) to discuss and receive clarification on a range of concerns regarding the project Development Plans, which we have outlined in greater detail below.

As a preliminary comment, we have received overwhelmingly negative feedback from members and supporters regarding the manner in which this public consultation has been conducted, with Early Works Plans and Development Plans, as well as Heritage Victoria Permit Applications, being exhibited concurrently, over a short period of time, and leading up to the Christmas period. The Melbourne Metro Tunnel Project will have an impact at a scale which has not been seen in a public works project for many decades. As such, we would expect that the public are meaningfully consulted at all stages of the project, and that adequate documentation is provided for public scrutiny. In our view, this has not been achieved in the exhibition of the Early Works Plan and Development Plans.

While the documentation and exhibition periods may be compliant with the Incorporated Plan which sets out the requirements, we are concerned that the lack of detail provided in the documentation (for example clearly labelled plans), and the failure to provide renders and significant view lines for the Development Plans, seriously undermines the ability of the community and stakeholders to provide an informed and meaningful response to the plans. This notwithstanding, we appreciate the opportunity to provide feedback, and the opportunities that the National Trust has had to engage with MMRA and the CYP, and we look forward to continuing discussions as the project progresses.

## **2 General response relevant to all Plans**

### **2.1 Aboriginal cultural heritage**

We note a number of instances across all documents when capitalisation has not been utilised for 'Indigenous', 'Aboriginal' and 'Country'. It is recommended that capitalisation occurs in every instance of using terms when referring to Aboriginal people and culture.

We strongly encourage CYP to undertake meaningful consultation with the Wurundjeri Tribe Land and Compensation Cultural Heritage Council, and all Registered Aboriginal Parties and Traditional Owner Groups of the Kulin Nation with ancestral ties to this Melbourne location, regarding how they would like this cultural heritage to be recognised and interpreted throughout the various precincts of the Project, including through public art, design, and interpretation strategies. We strongly recommend that consultation with Traditional Owners is undertaken as early as possible in the urban design process, and note that no documentation has yet been provided to confirm whether this has been undertaken.

Ongoing consultation with Traditional Owners is essential in realising a 'connection to Country' where meaningful design is not about an end result, but a process of connections between people and place. Melbourne Metro Project presents a unique opportunity to create meaningful contemporary places for Aboriginal and non-Aboriginal people. Meaningful consultation with Traditional Owners involves engagement with people in a project throughout its development, creating ongoing connections to place for people and culture, and cannot be an addition in the final stages via landscaping solutions only. Engaging with Traditional Owners in urban design processes will create positive outcomes for the public interface of the Project, creating a contemporary connection to culture. We suggest engaging an organisation such as Indigenous Architecture and Design Victoria to provide expert advice regarding the urban design of the project and appropriate consultation.

### **2.2 Signage**

While we recognise the requirement for clearly delineated signage across the precinct, we submit that a reduction in height is made to the proposed 5 metre high illuminated station marker signs. We submit that 5 metres is excessive and represents an excess of built form overshadowing the scale of pedestrians within the surrounding streetscape. We would be more comfortable with a reduction of height to 3 metres as this would be more in keeping with the human scale of the urban landscape.

## **3 Early Works Plan**

In total the Early Works Plan proposes the removal of 316 trees across seven precincts. While we acknowledge that some tree removal would be required as part of the Project, we submit that this Early Work Plan does not sufficiently demonstrate that the removal of these trees is associated with the Early Works. We note that EPR AR1 states: "Trees to be removed during early works must only be those associated with early works". There appears to be no evidence in the exhibited Early Works Plan to confirm that the extent of tree removal is directly associated with early works.

The National Trust is concerned that the Early Works Plan represents the worst-case scenario of tree removal over the entire construction footprint of the Project, and that the detailed design process could see many more trees retained. We note that tree removal for each precinct is “subject to final design”, yet there does not appear to be a direct relationship between the trees proposed for removal in the Early Works Plans, and the detailed design process occurring in the Precinct Development Plans. Rather, the Development Plans, having been exhibited concurrently with Early Works Plan, appear to assume the approval of all tree removals identified in the Early Works Plan, despite the fact that some tree removals will be subject to detailed design, rather than required for Early Works. This may see in principle support for the removal of trees which could potentially be retained through detailed design. We submit that any approvals for tree removal should prioritise the retention of as many trees as possible, rather than expediency of approval for the project contractors.

We submit that these plans do not clearly articulate economic and environmental value of the existing tree and vegetation cover that is proposed for removal as part of these extensive works. The Plan does not give the Useful Life Expectancy of the trees, nor a rating of their condition. On the advice of our Expert Significant Tree Committee, we submit that each mature trees that is slated for removal would have a value exceeding \$20,000, which would will amount to the loss of millions of dollars in tree assets over the life of the project. Indeed, the visual and amenity impact of the proposed overall works cannot be overstated. The removal of trees in the Domain and Parkville Precincts in particular will have a profound impact on the landscape character and heritage values of these locations for many years to come. The expected minimum time for replacement of amenity and heritage value to the community from advanced tree replacements works of this scale would be 20 years, in addition to the significant loss of carbon sequestered by mature trees removed. We do not consider that the Early Work Plan as exhibited provides enough documented evidence to demonstrate that the heritage values of these densely treed locations have been accommodated by the early works, design and location of station and rail infrastructure. We advocate for there to be greater transparency about the full extent of tree removal provided to the communities that will experience a significant loss of tree canopy cover, and resulting health and amenity impacts.

The National Trust takes the position that it is not appropriate to remove any mature tree only for temporary access to a work site. We submit that the removal of mature trees for the convenience of temporary access is not acceptable, and advocate for all options to be explored for retention, including options for relocation of trees with reinstatement at their former locations at the conclusion of the Project, as documented in EPR AR1. In particular we submit that there is documented successes in moving elms in the City of Melbourne, including the elms moved and reinstated for the City Link project. Our Expert Significant Tree Committee advises that there is a good success rate for elms to be relocated for works and reinstated in their former location. The costs of such an exercise can be relatively low if they are retained on site, which we believe there would be opportunities to do in this precinct. We advocate for this option to be seriously considered for the elm proposed for removal for site access to Edmund Herring Oval (tree EH001 documented in the Early Works Plan). Other elms and indeed trees across many precincts could be retained by this method including a number proposed for ‘Site Establishment and Hoarding’ in addition to ‘Site Access’.

## 4 Domain Station Precinct Development Plan Submission (ANZAC)

### 4.1 Design response

With response to the CYP public realm principle of 'Context and nature' we support design that responds to the Domain's unique character and submit the attributes of this character should be better articulated, for example in relation the natural heritage values of the landscape and its connection to commemoration. We support design that contributes to good placemaking, particularly with large public infrastructure projects such as the Melbourne Metro Project. We note the statement on page 10: "The connection to country, the six seasons and natural systems have been embraced in the concept design of Albert Road Reserve". Furthermore this concept is described as "a contemporary and concentrated representation of the pre-European landscape that transitions down Albert Road from Woodland to Lagoon". Earlier in the Development Plan, the following the historical and natural context is provided

*Before the arrival of European settlers in 1835, the area around the Domain precinct was occupied by the Boon Wurrung People and the Woi Wurrung People. Albert Road, between St Kilda Road and Kings Way, was grassy woodland, riparian woodland, grasslands and brackish wetland landscape. This landscape transitioned to swamps and lagoons in the area where Albert Park Lake and the Albert Park Reserve are now located.*

*The Domain precinct was originally a camping area for Aboriginal people as its nearby water bodies were a rich source of food such as eels and fish. The site area has an Ecological Vegetation Class (EVC) of Plains Grassy Woodland (EVC 55), and transitions to Brackish Lake Aggregate (EVC 636) towards Albert Park Lake.*

*The Domain precinct has significant historical cultural heritage values with sacred, heritage registered places including the Shrine of Remembrance, Domain Parklands, St Kilda Road and the South African Soldiers Memorial.*

The National Trust submits that the Indigenous cultural heritage of the area is just as significant as the remaining twentieth century buildings, memorials and landscaping within the precinct. We have concerns that statements such as the above privilege references to Aboriginal culture via a tangential link to a 'pre-European' state in the past, and do not sufficiently acknowledge the current connections that Aboriginal people have with place, nor contemporary Aboriginal culture. As expressed in our introduction, we strongly encourage CYP to undertake early and meaningful consultation and engagement with the Wurundjeri Tribe Land & Compensation Cultural Heritage Council, and all Registered Aboriginal Parties and Traditional Owner Groups of the Kulin Nation with ancestral ties to this Melbourne location, regarding how they would like this cultural heritage to be activated and interpreted within this Precinct of the project.

### 4.2 Architectural response

We acknowledge the CYP design vision for Domain precinct as a 'Pavilion in the Park'. While we support the vision that the station building be an integrated public place, we do not consider that it should form a landmark within the cultural landscape of St Kilda Road. The National Trust considers that Melbourne's radial boulevards are critical to the heritage of the city and the nation. They contribute significantly to the image and character of Melbourne and

should be managed for their long term conservation value. Historically, Melbourne's boulevards, of which St Kilda Road is a fine example, are outstanding landscape assets for their aesthetic, amenity and shade value. Stretching south from the centre of Melbourne, St Kilda Road is known for its strong landscape character, which is largely defined by its avenue plantings of Plane Trees and Elms. Coupled with St Kilda Road's strong relationship and association with the Domain Parklands, the significance of this city landscape and its associated view lines are worthy of being protected as part of the MMRA Project.

We note that the proposed Domain interchange tram stop has been conceived as a significant architectural feature at a height of 7.5 metres, and a length in excess of the current tram stop, however we do not support the stated intention for the station to be "an architectural focal point of the St Kilda Road boulevard"—indeed, we consider that an additional "architectural focal point" at this location is not warranted, and will adversely impact the recognised heritage values of the precinct. We submit that the proposed design would detract from the Shrine of Remembrance as the focal point of multiple landscaping features currently in the precinct. We submit that the visual bulk and height of this structure represents excessive built form in this section of St Kilda Road, and in the context of the Shrine of Remembrance. As currently proposed, this built form has the potential to dominate landscape character of the boulevard, detracting from the natural heritage values of mature trees, the surrounding Domain parkland and the focus on commemoration. Furthermore this structure may impact on the significant view lines to and from the Shrine of Remembrance. We note that renders and view lines have not been provided as part of the exhibited documentation, making it impossible for the community to assess the true impact of the Development Plan on this significant landscape, and submit that this information should be provided for exhibition as part of the future Heritage Victoria Permit Application.

We submit that the built form at this location should be recessive and permeable, responding to current conditions. Accompany any Heritage Victoria application, we would expect to see a Landscape Impact Assessment undertaken that considers the impact of this structure on the surrounding cultural landscape. Such an assessment should recognise the importance of current view lines along St Kilda Road, the complex view lines associated with relationship of the Shrine of Remembrance to the bay, and the heritage value of the boulevard character. We submit that the proposed height of 7.5 metres should be further reduced, keeping built infrastructure at ground level to a minimum. This will be important in maintaining view lines to heritage places and allowing the establishment of landscaping features of this precinct.

The other factor to consider is time required to return the amenity value of trees to the community which, if impacted by shade or filtered light, could take decades longer to establish amenity than the expectations which have been outlined in the documentation. Should shade impinge on young plantings the National Trust would have serious concerns about the viability of the Project to reinstate the important asset of tree canopy cover.

With regard to the statement that the station canopy is design to sit within the tree canopy, this assumes that the tree canopy has exceeded the 7.5m height of this structure. We consider that it would take decades for the trees to surpass the height of the proposed structure. As such, any pruning of the trees in close proximity to the station structure must be managed to a

plan with the full canopy form of the tree in mind. We note that should inappropriate pruning be undertaken to the newly establishing trees, if for instance they were touching the built form, this may impact the ability of that tree to establish its full canopy, which may result in a reduction of tree canopy cover at this location. We submit that careful management of re-establishing trees at this location will need to be undertaken over time by a qualified and experienced arborist, and that costs and provisions to undertake this work are accounted for early in the Project.

We submit that the station architecture at this location needs to be permeable and of lower height allowing for sufficient light to filter to newly established plantings, and furthermore to not detract from such plantings in the overall view of the urban landscape when these trees mature. We would expect that thorough shade diagrams are undertaken prior to finalising any station design to provide evidence as to the viability of re-establishing the dense canopy planting desired at this location. We highlight that if young trees are shaded for a substantial period of the day and at certain times of the year then their growth rates will be slower than otherwise. We also note that shade can distort the growth of trees so that they do not develop a full and balanced canopy. Such distortion can seriously impact the aesthetic and landscape impact of the plantings. The National Trust has seen several urban landscape plantings fail due to excessive shade.

Furthermore, should glass utilised in the station structure, we submit that the quality of the glass should be carefully considered during detailed design in order to ensure the quality of light that filters through it. This is an important consideration for the establishment of trees at this location. There is a specific quality of glass that allows for the full solar spectrum to pass through, and this is extremely important for the juvenile trees that will be establishing below. Choosing a glass that does not allow the full solar spectrum to pass will result in tree losses at this location which would not be acceptable.

### **4.3 Landscape response**

We support the retention of the Windsor Oak as part of the Albert Road Reserve, however we question whether the concept of 'drawing inspiration from the area's pre-European landscape' will conflict with the current commemorative focus of this reserve. We would expect that the landscaping concept for this reserve be well resolved via consultation with communities, including Traditional Owners, and that the existing values of Albert Reserve are maintained. We reinforce our position outlined above, that meaningful consultation with Traditional Owners involves engagement with people in a project throughout its development, creating ongoing connections to place for people and culture, and cannot be an addition in the final stages via landscaping solutions only.

### **4.4 Public Realm response**

We support the proposal for integrated public art to facilitate unique and engaging public spaces. In response to a proposal for a collaborative commission for areas of the landscape with an Indigenous designer as part of the Culture and Arts Strategy, this should be carefully integrated into the project design in a considered and appropriate way. As with our submissions above, we encourage CYP to engage with an Indigenous designer in a meaningful way at concept stage, rather than in the final stages detailed design. Engaging with Traditional

Owners and/or Indigenous designers in urban design processes early in the project will create positive outcomes for the public interface of the Project, creating a contemporary connection to culture. Public art has the capacity to spark community discussion and debate, to celebration connections to place and challenge perceptions, and thus a site responsive work will positively enhance the historical associations of this landscape. We note that St Kilda Road is the location of a wide range of public art projects in both public and private land, and the proposal for an Indigenous designed public art work at this location would further enhance the identity of St Kilda Road. Many of the works on St Kilda Road are well known to our Expert Public Art Committee, and we would be pleased to have the opportunity to respond further regarding this proposal as the project progresses. We would also appreciate the opportunity to respond to the Culture and Arts Strategy identified in the Development Plan. We note that there is a Culture and Arts Strategy, and would appreciate the opportunity to review and provide feedback on this strategy.

#### **4.5 Arboriculture**

We support the minimisation of existing tree removal which has already been undertaken as project plans have progressed, and encourage CYP to continue to strive to maintain as many trees as possible throughout detailed design. We are pleased that there has been a reduction of 54 trees removed at the Domain precinct from that assessed in the EES. We are generally comfortable with the 13% increase in tree numbers from current conditions and would expect that this is maintained or increased through detailed design. In our experience failure rates of up to 20% are quite common for replanting of urban trees and as such ongoing high quality maintenance of tree replacements is essential to reduce this likelihood. We submit that an adequate review of the management of these replacement trees should be undertaken at 2, 5 and 10 years following planting, a process which will be closely monitored by the National Trust and by the community in the years to come.

### **5 CBD South Precinct Development Plan submission (Town Hall)**

#### **5.1 Degraes Street underpass - also known as 'Campbell Arcade'**

As noted in the Development Plans CBD South Station, 'A direct below ground underpass is proposed from the CBD South Station to Flinders Street platforms via the existing Degraes Street underpass'.

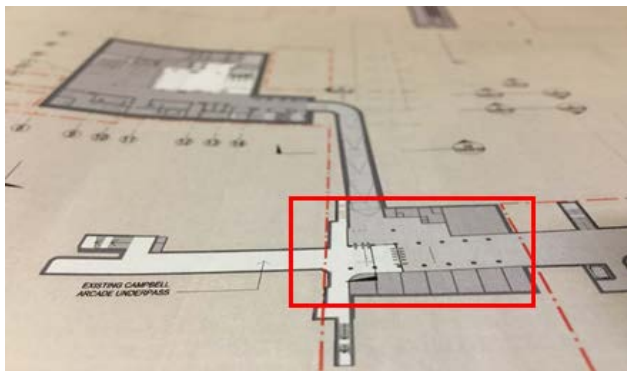


Figure 1: Area outlined in red highlights proposed impact on Campbell Arcade

The National Trust acknowledges that the cultural heritage impacts on the heritage-listed Campbell Arcade (VHR H1083 HO649) are a more recent design response and were not discussed or interrogated during the EEs process. At a meeting between National Trust, MMPR and CYP in December 2017, it was noted by CYP that ‘the proposal to connect the Town Hall to Flinders Street station via Campbell Arcade aims to utilise existing infrastructure that is somewhat currently underutilised, particularly in comparison to access points at Elizabeth Street and Swanston Street’. As shown in the plan above, the proposed connection would require access to Campbell Arcade, resulting in the removal of three shops on the eastern side, and the construction of a ticket gate which would removal free public access to the space.

The National Trust is strongly opposed to the proposal as it stands. The National Trust believes that Campbell Arcade has two levels significance, 1) as an example of post-war transport infrastructure (and the first major public infrastructure project in the city following WWII), and 2) the contemporary socio-cultural significance of the tenancies and use as an art space over the past two decades. We believe that for these reasons, it is important that no shops are removed from the arcade, that the symmetry of the arcade is maintained, and that the space remains freely accessible to the general public.

We note that Campbell Arcade is included within the Extent of Registration for Flinders Street Station, and specifically mentioned in the Statement of Significance as historically/socially ‘the first major public infrastructure to be built in the city following WWI, generating considerable public interest’ and aesthetically as ‘a rare and substantial example of late Art Deco design in a distinctive 1950s colour scheme.’ The Victorian Heritage Register attributes Campbell Arcade with the same level of significance as other parts of the station complex, including the iconic façade, and the concourse. The National Trust therefore does not believe that the proposal to impact on Campbell Arcade should be approved as part of the Development Plan until an assessment under the Heritage Act 2016 has been undertaken. Crucially, this includes the requirement to publicly advertise the plans for community comments and feedback. We submit that prior to the approval of the Development Plan, a thorough heritage assessment and heritage management plan for Campbell Arcade **must** be undertaken in line with EPR-CH1:

*EPR - CH1:*

*To avoid or minimise impacts on the cultural heritage values of heritage places, prior to commencement of relevant works, prepare and implement a Heritage Management Plan (HMP) in consultation with Heritage Victoria or the relevant local council (as applicable).*

*The HMP must identify the heritage values of the place, the degree of significance of component parts, how proposed works will affect the heritage values, the mitigation measures to be adopted to avoid or minimise impacts on heritage values and any possible heritage benefits.*

The National Trust submits that the HMP should be made available to the public, and inform any decision about the site. Any heritage assessment for this site should include a



consideration of the architectural and aesthetic significance of the fabric, as well as the social and historical significance of the place, including its cultural value as an art space.

We note that the salmon pink wall tiles, pink and black terrazzo floor, polished black granite columns, chromed steel shopfronts, and amenities, including toilets, are original to the 1950s scheme, and should be retained and conserved *situ*. The National Trust would like to see this original scheme and heritage fabric retained and restored rather than redeveloped and 'modernised'. We believe that retaining this original fabric and undertaking restoration work would ensure the future of this space as both an historical and socio-cultural asset for the City of Melbourne.

The National Trust would like to see all alternative options explored before this section of the Development Plan gains approval. Our recommendation would be to move the ticket gate to reduce impacts on the number of shops free accessible to the public, and to relocate the walkway connection to the larger shop in the south-eastern corner (currently a newsagents) so multiple shopfronts do not have to be removed, and the symmetry of the arcade can be retained.

## **5.2 City Square (over-site development)**

As noted in the Development Plan, as part of this project, City Square will be 'reconfigured and enhanced' with a new station entry, creating a new integrated design that will incorporate the above ground Metro Tunnel infrastructure. The Development Plan indicates that a 'connection to Country' and natural systems 'have been embraced within these locations, expressed through the proposed local species selection in reference to the six seasons theme'.

The National Trust believes that the redevelopment of City Square presents an incredible opportunity to create a new legacy for the city through genuine and meaningful engagement with the state's Indigenous community to create a new space that embeds Aboriginal representation at the heart of the city. We believe this is an opportunity to create a functional yet highly emotive and meaningful space such as that created by Jefa Greenaway and Charles Solomon at the RMIT University City Campus, 'Ngarara Place'. As outlined in an article by ArchitectureAU (source: <https://architectureau.com/articles/indigenous-garden-opens-in-heart-of-melbourne/>):

*Ngarara Place, a Indigenous landscape designed by Greenaway Architects, has opened at RMIT University's city campus.*

*The initial idea for Ngarara Place came from RMIT Ngarara Willim Centre – to build a visible presence and recognition of the Aboriginal and Torres Strait Islander people, cultures and histories as connected among the lands of the Kulin Nations in which RMIT stands.*

*The design of the space draws on four key pillars – connection to Country, cultural motifs, contemporary Aboriginal art and knowledge exchange.*

*Created, designed and built by a mainly Indigenous team, the space includes an Indigenous-themed courtyard area, amphitheatre-style seating, sculptural laser-cut smoke pit, and a space to host ceremonies, gatherings and events.*

The National Trust supports the use of meaningful engagement with Communities to achieve urban design responses throughout the project which ‘embrace’ and references Aboriginal cultural heritage, and we consider that City Square is an opportunity to create something incredibly powerful and symbolic that would leave an enduring legacy for the CBD.

It is noted in the Development Plan that ‘the final architectural design of the City Square canopy and Federation Square entry is under review with stakeholders and will be subject to an amended Development Plan at a later stage’. Guided by our Aboriginal Advisory Committee to the Board, the National Trust would welcome involvement in consultation with regard to the proposed over-site development for City Square. Building upon meaningful consultation with representatives from the Kulin Nation whose ancestors used and interacted with the land long before European settlement, we also strongly encourage that consultation is undertaken with Indigenous Architecture and Design Victoria (IADV) in regard to the design of City Square, and across the entire footprint of the project more generally, to ensure that Indigenous consultation and cultural heritage is incorporated into the urban design response in an appropriate and meaningful way, and in a way that fosters contemporary Aboriginal design and connections.

### **5.3 Burke and Wills Monument**

We note that the Burke and Wills Statue is currently in storage while construction in City Square takes place. During the EES process, the National Trust recommended that rather than placing the monument in storage for the duration of construction, that the monument be relocated to the grounds of the Royal Society of Victoria (RSV) on Victoria Street. The RSV were the sponsors of the ill-fated expedition and later, when Burke and Wills were laid out for mourning in the hall of the RSV, 86,000 Melbournians were reported to have filed past to pay their respects. The National Trust maintains its position that the relocation of the statue to the Royal Society of Victoria should be considered as part of this project.

### **5.4 City Square Art and Mockridge Fountain**

As outlined in the Development Plans, the City of Melbourne have provided detailed briefing requirements for the design and operation of City Square. As part of these design measures, we note that the pre-existing City Square art collection (e.g. Larry La Trobe and Beyond the Ocean of Existence) will be reinstated into the redesigned of the space, and that the Mockridge Fountain will be integrated into the Collins Street station entry stair wall. The National Trust would like to see further details regarding the proposed reinstatement of these artworks, and we consider that further community consultation should be undertaken as part of detailed design for City Square.

The National Trust submits that in line with EPR CH5, a detailed methodology in accordance with the *Australian Burra Charter 2013* should have been developed to oversee the process of dismantling, storing and reinstating with heritage fabric. If this has not been completed for the City Square art collection and the Mockridge Fountain, the National Trust recommends that this is done immediately to ensure adequate storage and appropriate reinstatement after below ground works at City Square are completed. The National Trust is concerned that these elements will be lost amongst the magnitude of the project, and we consider that they are important assets to the city which should be appropriately managed

In particular, the Mockridge Fountain, a commemorative public fountain designed by Ron Jones, Simon Perry and Darryl Cowie with funds bequeathed by John Mockridge, is a highly significant asset to the City of Melbourne, and should be retained as close to its original location as possible to retain its historical context. Associated interpretation should also be considered to ensure the work can be understood and enjoyed by future generations.

## **5.5 Federation Square**

We note that the final architectural design of the Federation Square entry is currently 'under review with stakeholders and will be subject to an amended Development Plan at a later stage'. Although not currently registered as a heritage place, perhaps due to its relatively recent construction, the National Trust submits that Federation Square clearly demonstrates heritage significance for aesthetic, social and historical reasons at the State level. As such, the National Trust believes that a heritage assessment should be prepared as a matter of urgency to ensure that insertions do not adversely impact the aesthetic and architectural significance of the place. Project architects Lab Architecture and Bates Smart should be consulted during the development of detailed design to ensure that new work is integrated into the overall design.

The National Trust submits that if the western shard is to be the preferred location for the station entrance in Federation Square, that the existing built fabric should be retained unaltered rather than demolished or redesigned, or that any new built fabric should be developed in consultation with the original architects. As noted in the Development Plan 'at Federation Square the visual appearance will be true to the original design intent and maintain the integrity and functionality of the valued meeting place'.

The National Trust looks forward to submitting further feedback in regard to the Federation Square entrance when amended Development Plans are released. During the design process, the National Trust, in consultation with our Built Environment Expert Advisory Committee, would welcome further consultation regarding the heritage significance of Federation Square and the most appropriate urban design response within this setting.

## **5.6 Over-site development at CBD South Station**

The National Trust would like to specifically address the potential over-site development urban design response on the site of the Port Phillip Arcade and Swanston Street. The National Trust submits that a substantial tower on this site would not be appropriate and should not be contemplated at this stage of the Development Plan. We submit that overshadowing of Young and Jacksons, Flinders Street Station, Federation Square, St Paul's Cathedral, and the historic Flinders/Swanston Street intersection, would be substantial. The National Trust submits that only a low-scale building on the site (ideally one with a public or cultural facility) would be appropriate and respectful of the heritage values of the area, particularly as a counterbalance to the high level of demolition that will take place across the CBD South Precinct. Public facilities and generous civic design should be prioritised above private commercial returns as part of this project.

## 5.7 Charles Bush Sculpture

As outlined in EPR CH15, 'during detailed design for the CBD South station, consult with City of Melbourne regarding the incorporation of the Charles Bush sculpture into the design for the new building on the Port Phillip Arcade site, preferably in a prominent position on the Flinders Street façade.' In the EPR Design Response included in the Development Plans, it notes the '1960s sculpture by Charles Bush, located in the former Port Phillip Arcade, will be reinstated in Cocker Alley. The sculpture will be integrated into the architectural design and will be part of an interpretation strategy for the site'. As referenced in EPR CH15, the National Trust would strongly prefer that the sculpture be positioned in a prominent position on the Flinders Street facade rather than on one of the walls of Cocker Alley. While the original corresponding built fabric of Port Phillip Arcade will no longer exist, the National Trust would like to see the sculpture retain its historic location and context on Flinders Street.

## 6 CBD North Development Plan submission (State Library)

### 6.1 Over-site development at CBD North Station

As noted in the Development Plan:

*Over-site development is proposed at CBD North Station, however it is subject to a separate planning process. It should be noted that provision for these developments are included within the station precinct architectural design responses. The images of the over-site development within the architectural drawings are indicative only and not representative of any final built form.*

As extracted from the Urban Design Response to the La Trobe/Little La Trobe Street Sub-Precinct, the National Trust notes the following:

*The main CBD North station entry will be at the northwest corner of Swanston and La Trobe streets on land to be acquired for the project. The land above the station infrastructure presents a commercial development opportunity.*

*The Melbourne Planning Scheme allows scope **for a substantial tower on the site**; the major height constraint is a requirement to protect the State Library forecourt from overshadowing. The station entry and future development above it will be prominent in important views from the State Library forecourt and Swanston Street." [Our emphasis.]*

The National Trust does not believe that a substantial tower on this site is appropriate and should not be contemplated at this stage of the Development Plans. We submit that overshadowing of the State Library forecourt, the State Library itself, and various places of cultural heritage significance along Swanston Street, would be substantial. The National Trust submits that only a low-scale tower on the site would be appropriate and respectful of the heritage values of the area, particularly as a counterbalance to the high level of demolition that will take place across the CBD North Precinct. Public facilities and generous civic design should be prioritised above private commercial returns.

### 6.2 Urban Design response

With response to the CYP public realm principle of 'Context and nature' we support design that responds to the unique character of the CBD North precinct. We support design that

contributes to good placemaking, particularly with large public infrastructure projects such as the Melbourne Metro Project. We note the statement on page 11 that: “The precinct’s unique characters, connection to Country and natural systems have been embraced in the design of the Franklin Promenade”. This concept is described as “expressed through the landscape of the biodiversity corridor; local species selection and reference to the six seasons”, and furthermore “some of the planting...will represent Indigenous food sources, providing a ‘link’ to the Queen Victoria Markets”. Earlier in the Development plan the following historical and natural context is provided:

*Prior to European settlement the site area was predominately Plains Grassy Woodland. The area has an elevated position within the immediate landscape and is part of the Elizabeth Street Creek drainage catchment. Up until the mid-19th century a Wurundjeri campsite was located close by. However, since European settlement, this precinct has undergone substantial commercial, urban and residential development.*

The National Trust submits that the Indigenous cultural heritage of the area is just as significant as the remaining nineteenth-century buildings within the precinct. We have concerns that a statement such as above privileges references to Aboriginal culture via a tangential link to a ‘pre-European’ state in the past and does not sufficiently represent the connections Aboriginal people have to this place in the present. While we support design that is responsive to Aboriginal cultural heritage, we do not accept that the landscape response of a ‘a biodiversity corridor’, local species selections, and the representation of Indigenous food sources necessarily constitutes a meaningful connection to Aboriginal culture and engagement with the six seasons. We refer to our introduction where we strongly encourage CYP to undertake early and meaningful consultation and engagement with the Wurundjeri Tribe Land & Compensation Cultural Heritage Council, and all Registered Aboriginal Parties and Traditional Owner Groups of the Kulin Nation with ancestral ties to the Melbourne CBD, regarding how they would like this cultural heritage to be activated and interpreted within this Precinct of the project.

### **6.3 Arboriculture**

We note that in the CBD North precinct there are 13 trees required for removal in addition to 44 trees which were removed by the Early Works Managing Contractor. This equates to 11 more trees than were considered for removal within the EES. We do not consider this an acceptable outcome. We do not consider that this sufficiently meets the EPR AR1 requirements to maximise tree retention during detailed design. With response to EPR AR3, we submit that an increase of 50% trees planted then currently exist is a positive outcome. The lack of natural heritage in this corner of the city means it is particularly important that trees replaced due to construction for the CBD North works should increase canopy cover for this area resulting in a net gain of green infrastructure.

In our EES submission we noted that there are five mature Spotted Gums slated for removal from the corner of Franklin Street and Victoria Street which are located at the edge of the construction area. We strongly encourage detailed design which retains these trees, if they remain in situ, as they provide an attractive contribution to the streetscape and have high amenity value both for pedestrians (including thousands of RMIT students) and for drivers

travelling west along Victoria Street. Should removal have already occurred as part of the Early Works Managing Contractor we submit that Spotted Gums should be used in the replacement of trees in this area.

We submit that an adequate review of the management of replacement trees in this precinct should be undertaken at 2, 5 and 10 years following planting, a process which will be closely monitored by the National Trust and by the community in the years to come.

## **7 Parkville Precinct Development Plan**

### **7.1 Architectural response**

We support an appropriate architectural response to the vision of the Parkville precinct as a 'Grand Promenade' and biodiversity corridor. We submit that the station architecture at this location needs to be permeable and of low height allowing for sufficient light to filter to newly established plantings, and furthermore not detract from such plantings in the overall view of the urban landscape when these trees mature. We submit that the proposed built form height of 4 metres could be further reduced. This will be important in maintaining view lines to heritage places and allowing the establishment of landscaping features of this precinct. We would expect that thorough shade diagrams are undertaken prior to finalising any station design to provide evidence as to the viability of re-establishing the dense canopy planting desired at this location. We highlight that if young trees are shaded for a substantial period of the day and at certain times of the year their growth rates will be slower than otherwise. We also note that shade can also distort the growth of trees so that they do not develop a full and balanced canopy. Such distortion can seriously impact the aesthetic and landscape impact of the plantings. Members of the National Trust Expert Significant Tree Committee have seen several urban landscape plantings fail due to excessive shade.

Furthermore we submit that the quality of the glass for the 50m long glass canopy at the main station entrance should be carefully considered in detailed design in order to ensure the quality of light that filters through the glass. This is an important consideration for the establishment of trees at this location. There is a specific quality of glass that should be used for construction that allows for the full solar spectrum to pass through. This is extremely important for the juvenile trees that will be establishing below. Choosing a glass that does not allow the full solar spectrum to pass will result in tree losses at this location which would not be acceptable.

The other factor to consider is time required to return the amenity value of trees to the community, which, if impinged by shade or filtered light, could take decades longer to establish amenity than currently anticipated in documentation for the project. Should shade impinge on young plantings the National Trust would have serious concerns about the viability of the Project to reinstate the important asset of tree canopy cover.

With regard to the statement that the station canopy is designed to sit within the tree canopy, this assumes that the tree canopy has exceeded the 4m height of this structure. Any pruning of the tree must be managed to a plan with the full canopy form of the tree in mind. Should inappropriate pruning be undertaken to the newly establishing trees, if for instance they were

touching the built form, this may impact the ability of that tree to establish its full canopy, which may result in a reduction of tree canopy cover at this location. We submit that careful management of re-establishing trees at this location will need to be undertaken over time by a qualified and experienced arborist and that costs and provisions to undertake this work should be accounted for.

## **7.2 Royal Parade (VHR H2198, HO1093)**

The National Trust considers that Melbourne's radial boulevards are critical to the heritage of the city and the nation. They contribute significantly to the image and character of Melbourne and should be managed for their long term conservation value. Royal Parade is one of the finest of these Melbourne boulevards, a recognised example of late 19th century grand boulevard plantings, and arguably among the best remaining elm avenues in the world. While we recognise that some of the trees in Royal Parade are aging and stressed, many have decades of useful life expectancy before them. The shade that they provide in summer is important to the ambience of this part of the city. We also consider that these trees play an important role in the health and safety of pedestrians in this part of Melbourne, particularly in mitigating the Urban Heat Island effect during warmer months. This is particularly important in the health precinct surrounding Parkville. Our Expert Significant Tree Committee has provided advice that the precinct of Parkville has already lost 20% of its canopy cover over the past decade, and further tree loss in this area will continue this trend.

In our EES submission, the National Trust was supportive of the proposed Grattan Street station location on the south side, as it avoids more of the Victorian Heritage Register-listed avenue of trees on Royal Parade. For the same reason, we strongly oppose the proposed station entry on the western side Royal Parade which has been presented as part of the Development Plan for the precinct, and submit that the construction of a station entry in this location would have an unacceptable impact on the heritage boulevard character of Royal Parade.

We note that during the EES concerns were raised by the Royal Melbourne Hospital about the need for pedestrians to cross Grattan Street to arrive at the Hospital. The EES IAC report acknowledged, with reference to the location of the station entrance on the northern side of Grattan Street, that "given the Hospital's stated intention to relocate the ambulance facility, such an alternative entrance should be explored" (page 53, Melbourne Metro Rail Project Inquiry and Advisory Committee Report, 21 November 2016). We submit that this alternative location, on the northern side of Grattan Street, should be seriously explored as an option for the station entry. We strongly encourage consideration of any alternative that facilitates the pedestrian access required by the Royal Melbourne Hospital as a preference to the location on the western side of Royal Parade, thereby avoiding the need for removal of any of the significant Elm trees on Royal Parade for this station entry, noting that reinstatement would not be possible due to the station entry.

Neither the Early Works Plan, nor the Parkville Precinct Development Plan sufficiently demonstrate that any alternative to tree removal on Royal Parade has been considered. We would only consider removal of these trees to be appropriate if removal in this location is demonstrated to be completely unavoidable and if there are appropriate measures undertaken

for their replacement with advanced trees and subsequent management. We submit that all care should be taken to maintain the continuity of Royal Parade as a boulevard, and we consider that the loss of 3 trees for a station entry at this particular location would have a significant impact as the southern entrance-way into the avenue. The impact of this proposed removal cannot be sufficiently mitigated through replacement planting, as we understand that no replacement tree work is proposed in the current plans. This is of serious concern to the National Trust and we submit that reconsidering the location or need for this additional station entry is the best way to mitigate its impact on the Elm trees of Royal Parade.

### **7.3 Landscape Response**

We support the vision for the Parkville precinct as a 'Grand Promenade' and submit that good placemaking, particularly with reference to established trees will be essential in the success of such a vision. We note the statement "Grattan Street will become a biodiversity corridor, bringing nature into the city and providing a 'connection to Country'" on page 13. While we support the creation of Grattan Street as a biodiversity corridor, we do not accept that this alone constitutes a 'connection to Country'. We reinforce our comments above encouraging CYP to undertake meaningful consultation with the Wurundjeri Tribe Land & Compensation Cultural Heritage Council, and all Registered Aboriginal Parties and Traditional Owner Groups of the Kulin Nation with ancestral ties to this Melbourne location regarding how they would like this cultural heritage to be activated and interpreted within this Precinct of the project, including the interpretation of Indigenous medicinal plantings.

We strongly support a design response for Grattan Street that focuses on dense canopy tree planting along with showcasing medicinal plants, which links well into the use of the precinct. We note that plant selection is to be undertaken in consultation with the City of Melbourne. We submit that given references to Indigenous medicinal plants forms part of this landscaping response, that meaningful consultation is undertaken with Traditional Owners in both the choice, design and interpretation of such plantings.

We strongly advocate for the removal of existing trees along Royal Parade and Grattan Street to be minimised further. These trees are already well established, and it will take in excess of 20 years to realise the urban design vision for a dense canopy cover in this area. It would be far preferable to retain more trees to realise this vision than to rely on the establishment of new plantings. In the view of the National Trust, more emphasis appears to have been given to University and Hospital master plans than to site responsive design in retaining the natural heritage values of established trees.

With regard to elm tree losses along Grattan Street and Royal Parade, we support the replacement of like for like. This is especially important along Royal Parade, given the international standing of this boulevard of elms. We accept that the useful life expectancy of these elms is limited and that block replacement may be the most appropriate option. However, it is very important that any works for 'road functional layout' on Royal Parade do not affect, reduce or limit the soil available to reinstate advanced specimens in the same location, in accordance with EPR CH13 and EPR AR3. We support installing widened central medians, which will facilitate replacement of elms currently missing from the Royal Parade



Avenue. We note that the elms must be reinstated in a way that comprehensively retains the existing regular spacing of trees that form the boulevard.

#### **7.4 Historical cultural heritage**

Our concerns regarding the impact on the Victorian Heritage Register sites located on University land are related primarily to the visual impacts associated with permanent infrastructure and development in close proximity to these heritage places, and the potential damage to these places from construction vibration and ground settlement.

We are concerned in particular regarding the construction of permanent infrastructure and ancillary buildings and the impact this will have on the Main Entrance Gate (Gate 6), Pillars and Fence (VHR H0918 HO343), constructed in 1876 and representing the original approach to the main University buildings. As part of these works, the heritage fabric will need to be dismantled, stored and then later reconstructed. As specified in EPR-CH5, it is a requirement that prior to this work commencing, a methodology in accordance with the Australian ICOMOS Burra Charter 2013 is developed. It is also essential that this work is documented and overseen by an appropriately qualified heritage practitioner. EPR-CH5 has also specified that prior to the dismantling of the Main Entrance Gate (Gate 6) Pillars and Fence, interpretative material for display is developed while the heritage fabric is not visible.

In developing the urban design response in regards to the reconstruction of the Main Entrance Gate (Gate 6), Pillars and Fence, it is essential that the heritage fabric is returned to as close to its original location and setting as possible (if not the exact location and setting). It is also important that the heritage fabric is unencumbered physically or visually by new infrastructure as part of the project. The heritage fabric should be clearly read as its own three dimensional and independent entity, and not incorporated into new walls, fences or street furniture.

The National Trust also has significant concerns regarding the proposed location of the station ventilation and emergency egress in close proximity to the Gatekeepers Cottage. We note that the design is not consistent with EPR CH14 that 'during detailed design the eastern Parkville station entry is set not less than 8-10 metres from the original Gatekeeper's Cottage and appropriate boundary treatment is retained or re-established for the heritage buildings.' We note the following EPR response has been included in the Development Plan:

*Ancillary facilities, however, such as station ventilation and emergency egress are within 10 metres of the cottage. To help reduce the visual impact of these facilities on the heritage structure, design measures such as landscaping to the edge of the new station forecourt (where the ancillary features border the Gatekeeper's Cottage) have been employed. Additionally the locating of these facilities still allow for unimpeded pedestrian flow throughout the precinct.*

The National Trust does not believe that landscaping is sufficient to mediate the impact that will result from this proximity, both in regards to view lines, and the potential damage from construction vibration and ground settlement. We submit that this design/configuration should be reviewed to determine a more suitable and less disruptive location for these

ancillary buildings. While this configuration has been designed to suit the future needs of the University of Melbourne, it does sufficiently address the significance of the pre-existing heritage fabric or the future legacy of these historic remnants for future generations.

The National Trust will respond to these issues in further detail when more comprehensive plans are submitted as part of the heritage permit exhibition period under the *Heritage Act 2017*.

## **7.5 Arboriculture**

We note that in the Parkville precinct there are 198 trees required for removal, and that this is 31 more trees than considered within the EES. We do not consider this an acceptable outcome, and submit that tree removal should be reduced from the level contemplated in the EES, not increased. We do not consider that this sufficiently meets the EPR AR1 requirements to maximise tree retention during detailed design. With response to EPR AR3, we submit that a replacement of 212 trees, an addition of only 14 more trees than removed, does not sufficiently allow for the reestablishment of lost canopy cover to equal or greater than those removed. It is a far reach from the MMRA's overall objective of doubling tree canopy cover.

On the advice of our Expert Significant Tree Committee, an increase of 7% of removed trees would only be successful if these trees are managed extremely well. Given that the City of Melbourne are the relevant authority for managing these trees, and considering their proven track record and experience with establishing trees, we submit that 7% would be adequate. However we would advocate for a further 3%–10% increase to account for any tree failure that may occur. In our experience failure rates of up to 20% are quite common for replanting of urban trees. We submit that an adequate review of the management of these replacement trees is undertaken at 2, 5 and 10 years following planting, a process which will be closely monitored by the National Trust and by the community in the years to come.

We also note that on page 33, in response to EPR CH18, that a different figure of 276 replacement trees is given, claiming a net gain of 76 trees. We ask that clarification is given to the community regarding the full extent of tree removal at this location.

With regard to tree removal in the parcel of land enclosed by the Vice Chancellor's House, Gatekeepers Cottage and Medical building, we submit that tree removal at this location is excessive and we question whether this serves the purposes of the University of Melbourne's Master Plan in preference to the approved EPR's for the Project. There does not appear to have been any attempt in the Early Works or Development Plan to ensure the retention of trees in this area. The trees in this section of the University property are an interesting and diverse mix of street trees, including Coast Redwoods and other species which are not commonly used as a street tree in the City of Melbourne. Furthermore we note that the University has lost at least 20% of its mature canopy tree cover in past 15 years, with this removal adding to this trend.

We submit that tree removal should be avoided wherever possible during detailed design and that options for relocation of trees with reinstatement at their former locations at the conclusion of the Project be considered. Consideration must be made to allowing for very

large trees to be retained or reinstated into the landscape plan following the construction of station. If Coast Redwoods can continue to be grown in the microclimate around the Medical Building, the National Trust encourages their replacement. We also strongly support the retention of the Cork oak at this location. The Cork oak is an uncommon species and there are minimal other examples of the species in the inner Melbourne region, further increasing the value of retaining this example.

## **8 North Melbourne Station Precinct Development Plan Submission**

### **8.1 Design Response**

With response to the CYP public realm principle of 'Context and nature' we support design that responds to the Arden's unique character and submit that further detail should be provided regarding the identified attributes of this character, for example in relation to the natural heritage values of the landscape and its connection to communities. We support design that contributes to good placemaking, particularly with large public infrastructure projects such as the Melbourne Metro Project. We note the statement on page 11: "The soft landscape will incorporate local species of the pre-European landscape providing a connection to country". Earlier in the Development plan the following historical and natural context is provided:

*An understanding of the Arden precinct's natural features and history is the starting point for developing the public realm identity for the area. The site's natural tendency to flooding, as well as its industrial heritage, have informed the design response.*

*Prior to European settlement, when Aboriginal communities cared for the country in the area now known as Arden, a chain of shallow ponds ran along the length of the Moonee Ponds Creek watercourse. These ponds were isolated during Melbourne's drier seasons, and flowed in wetter months after heavy rains.*

*The area would have provided a water source as well as abundant plant and wildlife resources for Aboriginal communities. Camp locations along nutrient-rich flood plains suggest that, at certain times of the year, Aboriginal people happily took advantage of the area's seasonal bounty. Eels and murnongs (yam daisy) appear to have been particularly prominent food sources along the creek.*

The National Trust submits that the Indigenous cultural heritage and connections to place are just as significant as the remaining industrial heritage of the precinct. We have concerns that a statement such as above privileges references to Aboriginal culture via a tangential link to a 'pre-European' state in the past and does not sufficiently consider the contemporary connections Aboriginal people have with this place, or contemporary Aboriginal culture. We reinforce our submission in the introduction strongly encouraging CYP to undertake meaningful consultation with the Wurundjeri Tribe Land and Compensation Cultural Heritage Council, and all Registered Aboriginal Parties and Traditional Owner Groups of the Kulin Nation with ancestral ties to this Melbourne location regarding how they would like this cultural heritage to be activated and interpreted within this Precinct of the project, including interpretation.

## 9 Conclusion

Thank you for the opportunity to provide feedback regarding the Melbourne Metro Rail Project (MMRP) and Cross Yarra Partnership (CYP) Development Plan for the CBD South Precinct. The National Trust understands the strategic justification for the project, and acknowledge that heritage is but one factor that will constraint the design and construction. In light of this we emphasise the importance of cultural heritage across the footprint of the project, particularly in regards to community engagement and satisfaction with the project, placemaking within the urban design response, and in leaving an enduring legacy for the future of the City. We look forward to providing further feedback as the project progresses. Should any further information or clarification of our position be required, please don't hesitate to contact my office on 9656 9818, or at [conservation@nattrust.com.au](mailto:conservation@nattrust.com.au).

Yours faithfully,

A handwritten signature in black ink, appearing to read 'F Watson', with a long horizontal flourish extending to the right.

Felicity Watson  
Advocacy Manager