

6 July 2016

Melbourne Metro EES Submissions  
c/- Planning Panels Victoria  
GPO Box 2392  
MELBOURNE VIC 3001

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

Dear Sir/Madam

Thank you for the opportunity to provide comment regarding the Melbourne Metro Rail Project (MMRP). We do understand that heritage is but one factor that will constrain the MMRP design and construction. We are also cognisant of the strategic justification for the project. The National Trust met with the Melbourne Metro Rail Authority in January 2016, and subsequently communicated concerns to the MMRA in writing, however we are not aware of any changes that were made to the project design as a result of this communication. Thus, there are still a few elements of the project that cause concern to the National Trust, in particular:

- grouting of the soil in the Domain Parklands and Queen Victoria Gardens leading to widespread tree deaths and irreversible changes to the landscape of the Domain Parklands;
- insertion of new surface infrastructure into the Domain Parklands and Queen Victoria Gardens;
- demolition of the Former Victorian Railways Carpenters Shop;
- demolition of 65 Swanston Street

### **Precinct 1—Tunnels**

#### **Domain Parklands H2304, HO398**

##### **Tom's Block**

The National Trust has serious concerns regarding soil stabilisation using 'grouting' techniques in the Domain, in the event that the 'upper' tunnel alignment under the Yarra but over the CityLink tunnels is approved.

This alignment option would have an unacceptable detrimental impact on the heritage of the Domain, which is characterised by a parkland of scattered trees dotted across lawns, divided by avenue plantings along winding roads and paths. The King's Domain and its plantings have historical associations with Baron Von Mueller, William Guilfoyle, Carlo Catani and Hugh Linaker, giving it an unrivalled pedigree of curatorship in Victoria.

Domain Parklands is included on the Victorian Heritage Register, and the statement of significance includes the following reference to the plantings:

*Hugh Linaker's design of the King's Domain with its avenue plantings, winding pathways and lawn areas with scattered specimen trees struck a balance between the strong geometry and regimented planting of the Shrine and Guilfoyle's picturesque landscaping around Government House...*

*The Domain Parklands contain a number of well established and intact avenues and groups of trees to create a landscape of outstanding quality and diversity. There are avenues, rows and/or specimen trees of Ulmus, Platanus, Populus, Quercus, Ficus, Eucalyptus, Corymbia, Angophora, Callitris, Agathis, Schinus, Juniperus, Pittosporum, Erythrina, Rapanea, Brachychiton, Elaeodendron, Calodendrum, Cedrus, Pinus, Cupressus, Araucaria, Olea, Cinnamomum, Magnolia, Grevillea, Fraxinus, Alectryon, Agonis, Syncarpia, Syzygium, Lophostemon, Lagunaria, and Butia, Phoenix and Washingtonia palms. The wide variety of tree forms, evergreen, deciduous trees providing autumn colour, leaf shapes and palm fronds, dense conifer foliage (green, golden and blue), bark texture and colour, all combine to give a contrasting and diverse landscape of high landscape and aesthetic value.*

The King's Domain and its plantings have historical associations with Baron Von Mueller, William Guilfoyle, Carlo Catani and Hugh Linaker, giving it an unrivalled pedigree of curatorship in Victoria.

Further, many trees within the Domain Parkland along the project footprint are commemorative trees which are culturally significant in their own right, often dedicated to eminent Victorians, organisations, or military personnel, battalions, vessels or conflicts.

In addressing the construction alignment option over the CityLink tunnels, page 23 of the Arboricultural Technical Report states:

*Ground stabilisation (grouting/soil mixing) may be required through Tom's Block above the bored tunnel to limit the impact of surface settlement, which would be anticipated to be up to 50mm, and the potential for ground subsidence during tunnelling.*

The National Trust understands that the soil stabilisation works required by the upper alignment involves injecting cement into the ground to a depth of approximately four metres (MMRA pers. comm.), a process which will kill 55 trees in Tom's Block including 30 mature healthy trees. The loss of these trees in particular is of serious concern. The trees in Tom's Block create the garden setting for the Victorian Police Memorial, the Weary Dunlop Memorial and the original Boer War Memorial. They include a tree which was planted in memory of victims of crime. In the direct foreground of the Shrine of Remembrance, this is a sacrosanct place for Victorians.

In addition to tree removal, it is even more alarming to consider that soil stabilisation works are irreversible and will render this area unable to be reinstated to its current condition due to the concrete pumped into the soil. This area is currently host to many large, healthy, mature tree specimens which make an enormous contribution to the landscape of the Domain and St Kilda Road. We do not consider that any 'pocket plantings' (MMRA, pers. comm.) could have the potential to reinstate the landscape. Widespread and deep removal of the grouted soil and replenishment with at least two metres of soil would be required to establish the very large and mature specimens that currently characterise Tom's Block. However, the measures proposed cannot realistically be

characterised as reinstating the landscape. This is not a temporary impact. The effect of these works in removing the entire tree canopy will be seen and felt in this area for generations.

The National Trust submits that the upper alignment over the CityLink tunnels is an unacceptable impact on the state significant Domain Parklands. The Arboricultural Technical Report states that

*This impact could be mitigated by the use of an Earth Pressure Balance Tunnel Boring Machine (TBM) and careful monitoring, negating the requirement for ground stabilisation and resultant tree loss.*

If the alignment over the CityLink tunnels must be taken, then the use of this Earth Pressure TBM should be investigated and adopted to avoid soil grouting and tree removals in Tom's Block.

The National Trust also has concerns regarding the placement of vent stacks or access shafts within the Alexandra Gardens, Queen Victoria Gardens and Tom's Block area of the King's Domain. The viewsheds of the heritage elements must not be impacted, which include the floral clock, the Victorian police memorial, the King Edward VII memorial, the Weary Dunlop memorial and the original Boer War monument in Tom's Block. Specifically, no new infrastructure should be placed in the immediate background or vicinity of any of the existing heritage monuments or memorials within the park. Design will need to be extremely sensitive and include a detailed landscaping plan to ensure these built features are blended into the existing gardens. We have concerns that this can be achieved given the open parkland character of Tom's Block – any new insertion is likely to be conspicuous and an unwelcome insertion that is not in keeping with the heritage landscape design.

#### **Fawkner Park**

The National Trust understands that Fawkner Park is no longer likely to be a launch point for the tunnel boring machine. Were the use of that site be required, it is understood that there will not be any impact on the 19<sup>th</sup> Century palm plantings along Toorak Road. The avenue of Moreton Bay Fig trees immediately adjacent to the Fawkner Park Kindergarten is of local heritage significance and should be retained and protected during works. Other trees lost due to construction for the southern portal works should be replaced as advanced trees as part of the project to ensure no net loss of green infrastructure.

#### **Precinct 2—Western Portal (South Kensington)**

We note that while the proposed Western Portal would have adverse heritage impacts on the Kensington Precinct (H09), including the demolition for four graded Edwardian residences (1, 3 and 5–7 Childers Street and 133 Ormond Street), the alternative design option would avoid the demolition of graded places within the HO. The National Trust therefore supports the alternative design option, which is consistent with the EES draft evaluation objective avoid or minimise impacts on post-settlement cultural heritage values. We note that this is also the preferred option of the City of Melbourne (Environmental Effects Statement City of Melbourne Submission p41.) We concur with the City of Melbourne's assessment that these graded residences "form an important edge to the Kensington Heritage Overlay Precinct" and contribute to neighbourhood character. Their retention is therefore preferred.

### **Precinct 3—Arden Station**

We note the impact on the proposed Railways Reserve Precinct, 173–199 Laurens Street (proposed H0137). 173–199 Laurens Street (Proposed HO 1093), which includes former Victorian Railways Carpenters Shop (later Victorian Railways Printing Works). The Trust understands that this heritage building has undergone sensitive adaptive reuse and now has a dual use as a carpentry workshop and event venue, making a positive contribution to this important urban renewal precinct. This building should therefore be retained if possible, or if removal is required, relocation options should be explored with the City of Melbourne. While we note that Lovell Chen recommends interpretation and archival recording prior to the demolition of these buildings (Lovell Chen Melbourne Metro Rail Project Historical Impact Assessment, 20 April 2016 p155), it is the view of the National Trust that these measures would not adequately compensate for the loss of this complex.

### **Precinct 4—Parkville Station**

#### **Royal Parade – H2198, HO1093**

The National Trust is supportive of the proposed Grattan Street station location, as it avoids more of the Victorian Heritage Register-listed avenue of trees on Royal Parade. The National Trust accepts that the useful life expectancy of the 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. The technical report makes reference to widened central medians, which will facilitate replacement of elms currently missing from the Royal Parade Avenue, and this is supported. We note that the elms must be reinstated in a way that comprehensively retains the existing regular spacing of trees that form the Avenue.

#### **Vice Chancellor’s House, 156-292 Grattan Street, HO821, H1003**

#### **Gatekeeper’s Cottage, 156-292 Grattan Street, HO338, H919**

#### **Main Entrance Gates (Gate 6), Pillars & Fence, 156- 292 Grattan Street, H918, HO343 and associated plantings**

The National Trust appreciates that buildings and built fabric (gates & fence etc) will not be impacted. The National Trust is concerned that 38 MLTV trees are proposed to be lost from the south and east sides of the Medical Building. Plantings around the house, cottage and the Grattan St gates are also proposed and should be avoided wherever possible during the detailed design. The trees on the University of Melbourne 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, and so consideration must be made to allowing for very large trees to be reinstated into the landscape plan following the construction of the station box. If Coast Redwoods can continue to be grown in the microclimate around the Medical Building, the National Trust encourages their replacement.

### **Precinct 5—CBD North Station**

The Trust notes that there may be a visual impact associated with new above ground structures in proximity to the City Baths, which should be mitigated through sensitive detailed design. The Trust also shares the City of Melbourne's concerns about the potential impacts from the proposed excavation and tunnelling works on the structural integrity of the City Baths. We support the City of Melbourne's call for preventative remedial action to address the structural integrity of the place which should be developed in advance of the main construction program to ensure the protection of the assets.

#### **Trees around CBD North Station – Swanston Street, Franklin Street, A'Beckett Street & vicinity**

Loss of mature healthy trees in this area has been limited by the station box being mined, and the National Trust is pleased to see the plane trees along Swanston Street with high landscape value are largely being retained. Trees in this vicinity should be avoided wherever possible, given the minimal amount of natural heritage in this part of the city. The dearth of natural heritage in this corner of the city means it is particularly important that trees lost due to construction for the CBD North works should be replaced in situ or nearby as advanced trees as part of the project to ensure no net loss of green infrastructure. There are five mature Spotted Gums (CN 058, CN059, CN060, CN077 and CN076) 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 to retain these trees 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.

#### **Precinct 6—CBD South Station**

As noted in the Lovell Chen report, the CBD South precinct is the most sensitive in heritage terms, comprising a high concentration of registered heritage places. The Trust's key concerns are outlined below:

##### **Vibrations**

The National Trust shares the City of Melbourne's concerns that vibrations could impact on the structural integrity of key heritage places in this precinct including the Town Hall buildings (including the portico on Swanston Street), Princess Bridge, Young & Jacksons Hotel, and the Manchester Unity Building. Further investigation on these potential impacts should be undertaken during the development of detailed design and construction methodology for the project, with additional Environmental Performance Requirements put in place to allow for proactive mitigation.

##### **Flinders Street Station**

We note that the proposed works to Flinders Street Station include the demolition of two shopfronts, internal wall structure and interiors of retail premises to Flinders Street (currently occupied by Scissors and Cignall); demolition of floors and ceilings to these spaces and floors and internal walls to level one above the escalator to access the concourse. This work should be undertaken in accordance with the Flinders Street Station Conservation Management Plan (Lovell Chen, 2012), and impacts on heritage fabric should be minimised through sensitive design.

##### **Federation Square**

The EES identifies two locations for station entrances in Federation Square; one utilising the “western shard” in which the Melbourne Visitor Centre is currently located, and one between the “western shard” and the entry to the “eastern shard”. Although not currently a registered heritage place, perhaps due to its relatively recent construction, Federation Square clearly demonstrates heritage significance for aesthetic, social and historic reasons; when imagining Melbourne 100 years from now, it is easy to imagine Federation Square as one of the city’s iconic heritage places.

As such, a heritage assessment should be undertaken as soon as practicable to guide work at this location, ensuring 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.

We share the following concerns outlined by the City of Melbourne with regard to the impact on Federation Square and views to and from St Paul’s Cathedral:

*The City of Melbourne is concerned the construction of any new structures within the existing open space within Federation Square. This outcome would likely interrupt the significant views of St Paul’s Cathedral from St Paul’s Court and elsewhere in the square. The view of St Paul’s is currently successfully framed by the eastern and western shards. The public space between these two shards is a popular gathering space that would be lost if the proposed entrance were to be constructed in this location. (Environmental Effects Statement City of Melbourne Submission, p75)*

We note that the remains of Princes Bridge Station are located underneath Federation Square and run parallel to and abut with Flinders Street. The most easterly portion of the platform can be seen from the back of Federation Square. These remains are included in the HV extent of registration for Flinders Street Station (VHR H1083 and HO649). Any impacts on these remains should be assessed as part of the design process.

### **City Square**

The Elm tree on the corner of Swanston and Collins streets (CS026) has local significance for the contribution that it makes to the landscape, and is also significant as an unusual horticultural specimen, having been transplanted as a mature specimen to its current location during the redevelopment of City Square. If this tree cannot be retained in situ during construction, the redesign of City Square should include a landmark tree near this street corner that provides a similar contribution to the streetscape as the established elm. Given pest control issues with elm trees, another deciduous species with a similar form could be more appropriate. We understand that arborists are providing advice regarding the most appropriate species choices over station boxes, and the National Trust Significant Tree Committee would welcome being consulted with regard to this particular location given the significance of this specimen.

We note that the Burke and Wills Statue may need to be relocated and stored during construction, or permanently relocated due to the new configuration of pedestrian access to the CBD South station. Rather than put the monument in storage for the duration of construction, the National

Trust and the Royal Society of Victoria are united in their recommendation that the Burke and Wills monument should 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. 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 RSV is a logical and respectful location for the monument to Burke and Wills. The dismantling, storage and reinstatement/relocation of the Burke and Wills State should be supervised by a suitably qualified conservator.

Other public artworks which may be impacted by works, including Larry La Trobe and the John Mockridge Water Fountain should be placed in storage and reinstated following the completion of works.

### **Flinders Gate Precinct**

We note the proposed demolition of a number of graded buildings in the Flinders Gate precinct. The Trust's key concerns with regard to individual places are outlined below. However it is important to recognise that the proposed works as a whole, including demolition, buildings, structure and landscaping, also have the potential to impact on the values of the precinct as a whole. This must be addressed through sensitive detailed design which is sympathetic with the precinct's heritage values.

#### ***65 Swanston Street, HO505***

The National Trust opposes the demolition of this building as an unacceptable detrimental impact to the precinct. If pedestrian access is required, the façade should be retained above street level and no rear addition should rise above the parapet.

#### ***Graham Hotel, 67-73 Swanston Street, HO505***

Post-war hotel and shopfront, façade has been substantially altered with the metal and tile cladding all removed in 1982. The hotel opened in 1956 in time for the Olympic Games. The side of the building still bears a stylised sign reading 'The Graham' in mid-century typography, which could make an interesting addition if retained and reinstated on a new building.

#### ***222 Flinders Street, HO505***

We note Lovell Chen's assessment that this building "is considered to be of a higher level of significance than the C-grading would suggest." We agree that the building should be retained in full to the extent of all original external fabric, with the carriageway utilised to provide pedestrian access from the station through to Flinders Street. Conservation works should also be undertaken to provide a positive heritage outcome.

#### ***Port Phillip Arcade, HO505***

Representative of its era, the Port Phillip Arcade is included in an example in Guide to 1965 Architecture. We understand that the best (and only) option to achieve direct pedestrian access to Flinders Street Station from the City South portal would require the demolition of the arcade, and that priority has been given to preserving older heritage places in the immediate vicinity. The National Trust submits that Port Phillip Arcade building should be recorded and the Charles Bush sculpture should be conserved and incorporated into the new design.

### **Precinct 7—Domain Station**

A total of 223 trees will require removal in this area, with more than half (134) being healthy mature trees. In close proximity to the Shrine, this area includes many dedicated trees, both mature examples and juvenile specimens planted as part of the recent landscaping works at the Shrine. Many of these trees commemorate specific sections of the armed forces. These trees form part of the Shrine of Remembrance and should be given due respect with every effort made to retain them as part of the detailed design. Some groups associated with the armed forces may consider that the dedicated trees should be moved elsewhere. If some specimens cannot be retained, then their species and significance should be adequately recorded to replace the plantings and plaques as soon as possible, either *in situ* or in a new location nearby agreed by relevant stakeholders.

It is noted that with regard to trees in St Kilda Road, the predicted useful life expectancy of the avenue plantings is generally short (6-10 years), and that replacement within the coming decade regardless of whether the Melbourne Metro Rail Project proceeds. However, this area is subject to many constraints, and sufficient soil volume and irrigation must be provided to re-establish a boulevard with equal or improved landscape characteristics, namely large trees with touching canopies planted at similar regular intervals to emulate the existing avenue.

### **Precinct 9—Western Turnback**

The Trust concurs with the recommendation in the Lovell Chen report to retain and protect the Cross Street Electrical Substation (H0192) as part of the construction of the Western Turnback.

### **Conclusion**

The National Trust's primary concern regarding this project is the impact to natural heritage due to widespread losses of healthy mature trees from some of Melbourne's most historically significant parklands and boulevards. The EES documents include alternative options which allow for the retention of dozens of mature, healthy trees, and the National Trust encourages that these options be pursued strongly. For the King's Domain and Shrine reserve, areas considered sacrosanct by Victorians, alternative options must be engaged to avoid irreversible impacts, particularly on the landscape around Tom's Block. Elsewhere, trees lost due to construction for the MMRP works should be replaced as advanced trees as part of the project to ensure no net loss of green infrastructure. As outlined in our submission, impacts on built heritage places generally relate to vibrations, demolition, and construction. These impacts should be mitigated through sensitive design, and the retention or relocation of historic fabric where practicable. Further investigation is required on heritage impacts at Federation Square.

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 9802.

Yours faithfully,



A handwritten signature in cursive script that reads "A. Foley".

Anna Foley  
Acting Manager, Advocacy and Conservation  
National Trust of Australia (Victoria)