

National Trust of Australia (Vic)
Submission to East West Link CIS Assessment Committee

Relevant Term of Reference of the Committee is

- (a) Whether the impacts of the project on cultural heritage places have been appropriately addressed.

Material reviewed for heritage purposes by NTAV is:

- CIS Chapter 9
- Lovell Chen Historical Heritage Assessment (CIS Appendix G)
- Lovell Chen Expert Statement in response to submissions
- John Patrick Comprehensive Impact Statement
- Parsons Brinckerhoff, European Cultural Heritage Database East West link Eastern Section (March 2013)
- Expert Witness Conclave – Historical Heritage

Seven key matters are raised in our submission:

1. The role of Heritage Victoria and the Heritage Council, particularly in relation to Royal Park and the Heritage Register
2. Have all the potential heritage places been “discovered”?
3. Are the unknown but potential archaeological places accounted for in the process?
4. We support the mound option for Ross Straw Field
5. Need for urgent recording of the condition of monuments at Melbourne General Cemetery
6. This is the most heritage-adverse project in Melbourne for several decades
7. There is no mitigation for demolition of built heritage fabric

We confine ourselves to places included on the Victorian Heritage Register or heritage overlay of the City of Melbourne and City of Yarra. We do not comment on Aboriginal heritage issues. We would expect a comprehensive treatment of Aboriginal sites to be dealt with in the Cultural Heritage Management Plan triggered by the Aboriginal Heritage Act.

The Heritage Act protects known and unknown post-contact archaeological places and we would expect that the project would comply with all requirements of the Act whatever the final alignment and its impacts on archaeology. Whilst none of the known archaeological sites appear to be of such a high level of significance that their retention is warranted, nonetheless sites such as the Yarra Bend Lunatic Asylum site whatever the level of impact of the project on the site, warrants full exploration and recovery of artefacts and materials.

The involvement of Heritage Victoria and the Heritage Council raises questions of process. The Heritage Council is established by the Heritage Act and one of its purposes – functions provided for in the Act – is to advise the Minister on steps to protect and conserve Victoria’s cultural heritage resources, and advise government departments and agencies on matters relating to the protection and conservation of places and objects of cultural significance [s8 (1) (a) and (g)]. The Heritage Council says its *Strategic Plan 2011-15* prioritises the provision of robust and effective advice to the Minister and Government.

The Heritage Council’s submission to the Panel is therefore decidedly meek. It notes that as East West Link is declared under the Major Transport Projects Facilitation Act 2009 the Minister is

responsible for all permit decisions under the Heritage Act. It notes that the Heritage Council's powers to hear appeals under the Heritage Act are therefore nil. Yet the Heritage Council says it "does not wish to prejudice any future registration or permit decisions that it may be required to make." It therefore limited itself to providing a copy of the Burra Charter and two policy documents on decision-making under the Heritage Act. The Heritage Council knows that any decisions of consequence will fall under the Major Transport Projects Facilitation Act and therefore this submission process was an opportunity to say what it really thinks. But it has quietly excused itself from its role as fearless adviser to the Minister and government on heritage matters.

We query the adequacy of research about other places with potential significance. *The European Cultural Heritage Database Assessment East West Link Eastern Section* by Parsons Brinckerhoff (March 2013) provides a desktop analysis of known heritage places. The first iteration of that document was April 2012. We have to wonder why Heritage Victoria did not immediately commence an assessment of Royal Park at that point? The project was announced in May 2013 and the reference design released in July 2013. Heritage Victoria had been engaged in the Agency Liaison Group since at least February 2013.

"In order to ensure that both the Reference Project and the CIS were developed in a manner that was consistent with the principles of the TIA (and in particular the principle of integration) the following steps were taken:

Establishment of an Agency Liaison Group in February 2013, which met on a regular basis and included members from the key regulatory agencies including Aboriginal Affairs Victoria, EPA, Melbourne Water, Heritage Victoria, VicRoads, Department of Environment and Primary Industries, and the Department of Transport, Planning and Local Infrastructure (State planning). The meetings provided a forum to co-ordinate policy and ensure effective communication between departments and agencies responsible for various parts of the transport system."

(East West Link (Eastern Section) Assessment Committee Request for Information under section 57(4) of the Major Transport Projects Facilitation Act 2009 Response of the Linking Melbourne Authority [11 February 2014]).

Heritage Victoria's role is merely to oversee applicable law approvals in terms of monitoring impacts from drilling vibrations.

Summary of demolition of places included in the heritage overlay

- 17 properties (10 contributory) Edwardian and Victorian cottages in Gold Street Precinct HO321
- 20 properties (one Victorian and one inter-war factory, two Victorian commercial buildings and 16 Victorian residences) in Clifton Hill Western Precinct HO317
- 13 properties (9 contributory) Edwardian cottages in Bent Street, Kensington Heritage Overlay Precinct HO9
- Demolition and possible relocation of a bluestone pitched laneway
- Removal of 66 mature trees on Flemington Road within HO3 and HO4
- Arden Street Road Bridge (proposed H1092)
- Factory complex at 29-37 Barrett Street, Kensington (proposed HO1098)
- Removal of four mature pepper trees in Arden Street (proposed HO1095)
- Loss of 9.3Ha in Royal Park
- Unquantified extent of loss of mature vegetation and trees (including River Red Gums) on Moonee Ponds Creek.

Overall

The loss of nearly 50 heritage-listed buildings and structures, the loss of at least 70 mature street trees, and significant loss of heritage-listed parkland and vegetation amounts to one of the most heritage-adverse projects of the last few decades in Melbourne. As Lovell Chen acknowledge, there is no mitigation for demolition of significant heritage places.

The CIS for heritage atomises the impact of the project on individual heritage places and heritage precincts and heritage inventory sites, and downplays heritage impacts. The HHA:

Reflecting the scale of the project, the nature of the infrastructure and its location extending through Melbourne's inner suburbs, there are a number of heritage impacts posed by the East West Link project which are of a scale and extent that would not commonly be proposed in heritage contexts. The majority of impacts related to the demolition or removal of heritage fabric and new works in HO precincts in Precincts 1, 3 and 5 cannot be fully mitigated, however, these impacts are localised within the precincts and do not represent wholesale change. The core heritage values of the precincts as a whole would be maintained. In all cases, there would be a need to consider the impacts of new development in detailed design including when considering the form of any future urban renewal where this may occur. In Precinct 5 the impacts would be significant in a physical sense and would be likely have an adverse impact on, or involve the complete removal of, a number of locally significant sites or elements. It is possible some of these impacts could be avoided or lessened during detailed design. (HHA, Lovell Chen, p. viii)

The Urban Design Charter (UDC) provides one possible framework for accounting of heritage within the overall project under the heading *Continuity and change - maintain a sense of place and time by embracing change yet respecting heritage values.*

The Linking Melbourne Authority state that:

It is important to recognise that the Reference Project is a concept design and that it does not constitute a considered response to the UDF...the final project, having implemented the UDF in accordance with the performance requirements, will implement the UDC in a number of ways. Some of these are discussed in more detail in the UDF. However a brief response against the provisions within the UDC is set out below...

Continuity and change – the East West Link is an expression of the way a City can change yet respect existing values. The tunnel is one obvious example of the protection of existing values and other aspects of the Project commemorate the changes brought about by East West Link.

(East West Link (Eastern Section) Assessment Committee Request for Information under section 57(4) of the Major Transport Projects Facilitation Act 2009 Response of the Linking Melbourne Authority [11 February 2014] pp61-2)

Precinct 1 (Eastern Portal)

As stated by Lovell Chen:

“The majority of impacts posed by East West Link – Eastern Section are on significant local heritage places subject to HO controls in the Yarra and Melbourne Planning Schemes or are proposed to have these controls.” (Lovell Chen Historical Heritage Assessment [Appendix G] p.127)

Gold Street Precinct HO321 (Formerly HO312)

The neighbourhoods of Collingwood and Clifton Hill are integral in creating the unique and distinctive image of the City of Yarra and its development. The Statement of Significance in the Yarra Heritage Database states that: “The Precinct contains the largest group of nineteenth century residential buildings remaining in Collingwood which have the ability to demonstrate what was the more typical nature of the broader suburb.”

The properties at 2-26 Bendigo Street and 108-112 Hotham Street Collingwood within the Gold Street Precinct (17 properties) are to be demolished. The CIS does not correctly assess (acknowledged by Lovell Chen in Expert Witness statement) the loss of contributory properties in the Gold Street Precinct. In total 10 properties are contributory to the precinct in the Yarra Planning Scheme. Of the 14 properties to be removed on Bendigo Street, an intact row of 3 Edwardian-era residences will be demolished, along with 4 Victorian-era residences, all contributory to the precinct. All three of the Edwardian residences on the northern edge of Hotham Street between Bendigo Street and Hoddle Street will be demolished, all of which are contributory to the precinct.

The north-eastern section of the precinct has a history of removal when in 1976 the original north eastern section of the precinct was demolished for the widening of Hoddle Street and the construction of the Eastern Freeway.

Clifton Hill Western Precinct HO317 (Formerly HO308)

The properties at 56-88 Alexandra Parade, 124 Gold Street and 355-367 and 406-420 Wellington Street, Clifton Hill within the Clifton Hill Western Precinct (20 properties) are to be demolished. The properties to be demolished include a mix of industrial, commercial and residential, 17 of which are contributory to the precinct in the Yarra Planning Scheme.

Lovell Chen (Appendix G, p.43) states that the loss of the former Box’s Hair Curling Works, Factory and Yard, 1880 (later Provan Timber Merchant) at 64 Alexandra Parade would “diminish the ability of the precinct to demonstrate the nature and extent of industrial activity along its southern edge.”

Additionally properties to be demolished include, at the corner of Wellington Street and Alexandra Parade 355 and 357 Wellington Street, two double-storey Victorian commercial buildings (altered at street level) contributory in the Municipal Planning Scheme. Between the two sites, on Alexandra Parade, there is a series of contributory Victorian-era properties and non contributory properties including an extensive inter-war factory building (406 Wellington Street). The 1998 Allom Lovell review of the City of Yarra Heritage Precincts, notes that one of the most intact streetscapes within the Precinct is Wellington Street. An additional 11 Victorian-era properties will be demolished on Wellington Street, all of which are contributory in the Planning Scheme. Lovell Chen (Appendix G p.44) states that the streetscape on both sides of Wellington Street is relatively intact and has a cohesive heritage character.

Of interest, there is an early bluestone pitched lane extending northward west of 56 Wellington Street and an early post office box at the corner of Wellington Street and Alexandra Parade. The CIS proposes to relocate these features if impacted. It is impossible to comment on the impact to these

two features with the impact unknown. The uncertainty surrounding the CIS in general is a concern of the National Trust.

A further consideration is the change in the appreciation of the relationship of the Clifton Hill Western Precinct to the VHR-registered Shot Tower – located on the southern boundary of the precinct. The Tower will not be directly impacted during the project; however the demolition of its immediate context including a combination of workers' housing and other industrial sites, related historically to the Shot Tower will inevitably alter the heritage value of the broader precinct.

Precinct 2 (Tunnel)

Melbourne General Cemetery

We note that the potential impact of vibrations to cause damage to the Melbourne General Cemetery site has been given a consequence of 'Minor' and a likelihood of 'very unlikely' (CIS Chapter 9, p.10). We argue that the impact on the cemetery from vibration on memorials, headstones and monuments has a **high** consequence, given the thousands of individual monuments, their sensitive physical nature, and, in many cases, existing poor condition.

The Melbourne General Cemetery was established in 1850 pursuant to an act of the New South Wales parliament. Designed by Albert Purchas, surveyor and architect, it was opened in 1853 and is one of Melbourne's most visited and loved sites. The cemetery expanded in 1859, closed in 1903 and reopened in 1927. The cemetery is centrally located, one kilometre north of Melbourne's central business district and contains unique evidence of Victoria's colonisation. Its features include various chapels, a recent mausoleum, funerary ovens, rotundas, significant trees and shrubs, gatehouses and a myriad of pathways laid out in a serpentine formation. (Victorian Heritage Register H0799)

"Impact assessment - as they extend below the cemetery, the two tunnels in the Reference Project would be at an indicative depth of 27 metres. At this depth they are in the order of 19.5 metres below the identified exclusion zone. On this basis there is not considered to be any direct or indirect risk of impacts on the fabric or heritage values of Melbourne General Cemetery." (Lovell Chen, Appendix G, Historical Heritage Assessment p.64)

"Tunnelling under the cemetery is not expected to induce vibration levels at the surface that exceed 0.5mm/s. Vibration predictions under the Melbourne General Cemetery indicates compliance would be achieved for potentially sensitive infrastructure." (Appendix K *East West Link – Eastern Section Tunnel Vibration & Regenerated Noise Assessment* p.v)

"In addition to or in association with the performance criteria for construction-related vibration, targeted structural assessments may need to be undertaken prior to construction, and vibration monitoring may be required throughout the project. Condition surveys would also be required. For example, in the case of the Melbourne General Cemetery, this would include a photographic and descriptive record for each monument. The record would be used to assess any damage should this occur." (Lovell Chen, Appendix G, Historical Heritage Assessment p.11)

CH4 captures this with the requirement that for specified heritage places: "Undertake condition assessments of buildings or structures prior to commencement of construction in the vicinity of the following registered heritage sites."

The Cemetery covers 43Ha and has 300,000 burials.¹ Costs of repair of headstones and memorials can escalate quickly. Our very recent experience of conservation and repair works to broken headstones and underpinning of and resetting of burial infrastructure for twelve burial plots came to \$25,000. Given the short lead time for construction of the tunnel, a full structural survey of the condition of the monuments, memorial and structures Melbourne General Cemetery is needed as a matter of urgency. We note that there does not appear to be a submission from the Cemetery managers.

Precinct 3 (Western Portal)

Construction within Royal Park

The CIS states in section 9.6.1, that:

“While the extent of Royal Park would be reduced in the north-west sector, the parkland as a whole would continue its historical and ongoing role as a place of passive and active recreation. The key heritage sites within Royal Park would be unaffected.”

We suggested in our submission that the CIS at the time was not in a position to draw this conclusion, given that the Historic Heritage Assessment (Lovell Chen 2013) stated that “there is no detailed heritage assessment for Royal Park”. The detailed work by Christina Dyson has informed the nomination by AILA of the Park to the Victorian Heritage Register. Submissions in response to the Executive Director’s recommendation to include the Park on the Register may be made until 21 April 2014.

A detailed heritage assessment has subsequently been prepared by John Patrick. The report “Cultural and Historical Significance of Royal Park” prepared for the City of Melbourne by Christina Dyson in September 2013, and included as Appendix 7 of the City of Melbourne Submission to East West Link Assessment Committee (November 2013) is a detailed and balanced account of significance and impacts and we prefer her evidence to that of Mr Patrick. Dyson states

“Within Royal Park itself, the impact of the project would be a substantial physical change in two locations within the broader park, with an adverse impact on the visual and landscape qualities of the parkland.” (CIS, Chapter 9, p.23). Indeed, Section 10.3 of the CIS assessed all four areas within Royal Park as having landscape and visual impacts of major significance. Major significance is the result of a large landscape impact in an area of high visual sensitivity, and is the highest impact category of assessment (as defined in Section 10.2).

The Historical Heritage Assessment (Lovell Chen 2013) states that:

“Some of the works could be partly mitigated by landscape remediation works including a replanting program. Other works would result in a permanent change and the impact could not be mitigated.”

It goes on to state that *“the construction of the western portal would result in the effective excision of an area of parkland that would no longer read as part of the park as a whole”*. The opportunities for improvement of landscape character and visual values at the precinct level, discussed in chapter 10.3.2 have no direct relationship to the proposed East West Link project.

To date the heritage of Royal Park has been protected by the established approach of no net loss related to development works, which is formalised as Principle 1 of the City of Melbourne’s Parks Policy: *Melbourne’s parkland areas will be maintained with no net reduction in area and new opportunities for parkland will be explored and developed where appropriate.*

¹ <http://mgc.smct.org.au/about-our-cemetery/>

This principle holds importance for a multitude of reasons, including: conservation of heritage and natural values and conserving the integrity of the cultural landscape of Royal Park; the amenity value for recreation and health benefits provided by public open space; and the role of the park in reducing the urban heat island effect in the face of warming climatic conditions.

We support the City of Melbourne's statement that the CIS does not adequately address the impact of the project on Royal Park especially Manningham Reserve and the proposed Elliot Ave interchange. The City of Melbourne's preference would be that the project would not have any negative impact on Royal Park. Of particular concern is the inadequate estimate of the area of open space that will be lost or permanently degraded and alienated from a range of park uses (effectively excising the land from Royal Park, as well as tree loss and other impacts on the park. We support the City of Melbourne calculations that state the permanent loss of usable open space in Royal Park will be 9.3 ha, or 6 per cent of 160 ha, not 1.3 ha or 1 per cent as noted in the CIS (Chapter 9, p.23). The City of Melbourne has costed a hypothetical replacement area of 9.3 ha of land in Parkville at \$207M.

With this calculation in mind, we support City of Melbourne's proposal for the Earth Mound option at the Western Portal of Precinct 3, as it provides some compensation of useable public open space in return for the loss of the Ross Straw Field and will lessen some of the historic intrusion and severance of parkland caused by the Upfield rail line cutting.

Removal of trees, including trees in Royal Park and Elms on Flemington Road

The enlargement and additional ramp proposed at Flemington Road will involve the removal of up to 66 trees, including a large number of Elms *Ulmus spp.* and a Lemon-scented Gum *Eucalyptus citriodora*, which is listed on the National Trust Significant Tree Register. This Lemon-scented Gum is not currently considered by the CIS. The National Trust has classified it for its Regional significance for its aesthetic significance and contribution to the landscape, therefore it should be included in the CIS along with the other significant trees on Flemington Road.

The realignment of the tram line will require the removal of heritage specimens of Sugar Gums *Eucalyptus cladocaylx*, Monterey Pine *Pinus radiata* and a Moreton Bay Fig *Ficus macrophylla*. These trees are detailed in section 9.6.1 (p.21) of the CIS and 10.6.2 of the City of Melbourne submission. Maps showing the impacts on trees in the Royal Park precinct and on Flemington Road are shown in Appendix 3 of the City of Melbourne submission.

The significant trees identified by the CIS and by the City of Melbourne submission (Appendix 5), should be preserved and re-located if necessary. This objective should be included in the performance requirements within the CIS. The excellent work in removing and re-instating the elms along the Yarra River for the CityLink tunnels over a decade ago should be used as a precedent of best practice management, and a worthwhile case study in managing this aspect of any proposed works that impact on vegetation, particularly in prominent locations such as Royal Park and the Flemington Road Elm boulevard.

We note that the amenity value of the trees to be removed for the entire project are valued by City of Melbourne in the region of \$15M (City of Melbourne Submission Appendix 3), and although we consider this to be a conservative estimate, we support the City of Melbourne's calculations that collectively reflects the tree's significant value to Victoria.

The planting undertaken as part of the CityLink project saw an increase in young trees and canopy cover in the vicinity of the Yarra River, Olympic Park and Gosch's Paddock. Such a positive outcome should be included in the objectives for each precinct of the East West Tunnel project.

Replanting of trees of the same species is proposed and encouraged if transplantation is unsuccessful, however it should be acknowledged that this will not avoid long-term impact on the integrity of Royal Park or the heritage boulevards. For example, the Historic Heritage Assessment (Lovell Chen 2013) highlights that the older, outer row of the Flemington Road boulevard is of considerable aesthetic significance, and that *“removal of the avenue trees would truncate the northern extent of the Flemington Road Elm avenue and would have an adverse impact on the aesthetic qualities and completeness of the avenue”*. This impact would be long-term given the several decades required for the new trees to grow to similar form.

Precinct 5 (Port Connection)

Gary Vines has written:

Kensington, North and West Melbourne, were among the earliest settled and industrialised parts of Melbourne. The presence of Batman's Swamp to the south, Moonee Moonee Chain of Ponds through the middle, and other swamp land, precluded development in many parts due to both the flood-prone nature of large areas, and the penchant for using such 'wastelands' for disposing of the city's rubbish and waste, and locating the undesirable noxious trades. Tanneries, fell mongers, boiling down works and other noxious industries, generally processing the products of Victoria's rural hinterland, congregated on the swamp margins and 'Flemington Bank' the sides of the swampy outlet of Moonee Ponds Creek. The presence of railway lines through the southern part of the precinct by the 1850s, linking initially to Geelong and Bendigo, and then by the 1880s to the North East Victoria, New South Wales, Ballarat and the Western District and South Australia, cemented the location on the junction of all these lines, as a critically important industrial zone processing rural products – wool, hides, wheat, etc. Drainage, swamp reclamation and flood protection works opened up more of the area to more substantial industrial and commercial uses. The parallel development of North Melbourne's transport industries (from the original catalyst of the horse and hay markets) saw the development of associated transport and engineering industry. Most of the associated housing was for the factory workers and their families, the services supporting the communities, and occasional foreman's and managers houses. This heritage is still very much evident in the mix of buildings in the area.

(Gary Vines, Evidence to Planning Panel C207, November 2013 p.)

Kensington Residential Precinct HO9

1-13 Bent Street – a row of predominantly Victorian single-fronted cottages, most likely workers' housing for the labour force at the Kensington mills and warehouses. The cottages extend deep onto their blocks, as seen in the aerial image. Nos. 7 & 8, and 12 & 13 are modern or recent infills. However the row of cottages contributes to its precinct HO9.

Moonee Ponds Creek and Infrastructure Precinct

Lovell Chen identifies that *“The road bridge at Arden Street would be required for demolition, with a new wider road bridge to be constructed in its place. Otherwise, it is not possible to assess the nature of the impacts proposed by the project in detail as these would vary depending on the specific design.”* (Lovell Chen p.113)

At the City of Melbourne C207 Arden-Macaulay Planning Panel the LMA made a written written submission that no Heritage Overlay should be applied to the entire Moonee Ponds Creek and Infrastructure Precinct as proposed.

The Panel supported the inclusion of Moonee Ponds Creek and Infrastructure Precinct and bridges in the overlay. C207 has not yet been gazetted.

Arden Street Bridge

Amendment C207 also proposed to include the entire Arden Street bridge in the heritage overlay as part of HO1092, the Moonee Ponds Creek and Infrastructure Precinct. To date only a balustrade railing has been included in the overlay (as HO814). The entire bridge is proposed to be demolished. "New ramp structures are proposed connecting to the elevated structure at this location and the existing Arden Street road bridge would be replaced." (Lovell Chen p.109)

The reinforced concrete bridge was completed in 1923. The deck length is 47m over seven spans. The statement of significance prepared for C207 states:

Historically as one of an early group of reinforced concrete road bridges associated with key engineering and construction company, the Reinforced Concrete & Monier Pipe Construction Company, and for its association with the firm's principal, Sir John Monash.

The contributory elements within this property include, but are not restricted to, external fabric from the creation or major development date(s), (1923), and any new material added in sympathy to the original fabric it replaced. This place and the identification of contributory elements have been assessed typically from the public domain.

Limb, Scurry & Limb/Alfred Lawrence & Co 29-37 Barrett Street

The site in its entirety is included within the project boundary (refer to Figure 69). The Reference Project would extend partly into the site, and the balance of the site could be required for construction lay down use. (Lovell Chen p.110)

The site was recently included in the Arden-Macaulay Heritage Review. The statement of significance says:

Alfred Lawrence & Co Ltd complex is significant historically, as an externally well-preserved and important manufacturing complex built up by Lawrence on this site since the 1920s and evocative of the various phases of industrial development of this low-lying part of the locality and within the manufacturing industry during wartime; and Aesthetically significant as including competent Moderne and Modernist designs by a recognised Heritage Assessment of 21-37 Barrett Street, Kensington architectural practitioners, Richard Butler and Frederick Morsby. (Graeme Butler & Associates Arden- Macaulay Heritage Review 2012 pp.230-232)

Arden Street Pepper Trees

"The potential for impact arises out of the alterations to the Arden Street roadway alignment which would be widened in this location, impacting on the root zone and canopy of the trees." (Lovell Chen p.117) It must be considered likely that the trees will be removed in their entirety.

Conclusion

The National Trust strongly encourages the responsible authorities to ensure that Victoria maintains its reputation as a State where environmental and heritage matters are given an appropriate and high priority when major urban infrastructure projects are undertaken. This project is a major public project which will affect Victorians for generations to come and so it is vital that heritage, environmental, and open space matters are given due consideration as they will impact on the future amenity and health of these generations as well as the liveability and character of this City.

If the project is to proceed we support City of Melbourne's proposal for the Earth Mound option at the Western Portal of Precinct 3, as it provides some compensation of useable public open space in return for the loss of the Ross Straw Field. As always, the National Trust, including members of the National Trust Committee for the Register of Significant Trees are prepared to offer their expertise where appropriate to facilitate the outcomes sought above.

The National Trust believes that the East West Link Comprehensive Impact Statement has understated the impact to heritage, landscape and significant tree assets, and in particular has not adequately addressed or reviewed the cultural and heritage values of Royal Park. The considerable loss to heritage precincts, individually-significant buildings and structures, the large-scale loss to the City's urban forest, and considerable loss of heritage-listed open space amounts to one of the most heritage-adverse projects of the last few decades in Melbourne.

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