



14 December 2016

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Dear Mr Smith,

Re: Permit Application P25649, St Kilda Road, VHR2359

Thank you for the opportunity to provide comment regarding the Melbourne Metro Rail Authority (MMRA) permit application for early works on St Kilda Road, Melbourne. This submission was prepared in consultation with the Expert Tree Committee of the National Trust of Australia (Victoria) (NTAV), and follows our submissions to the recent Melbourne Metro Rail Inquiry.

We understand that the proposed works include the establishment of a construction work area, with the physical impact being “the removal of trees, bluestone and concrete street elements including kerb and channel, tramway infrastructure, road surfacing, road infrastructure and the like within the extent of registration” (Heritage Impact Statement, Lovell Chen, page 4). We further understand that 103 trees are proposed to be removed during these works.

We submit that the scale of the proposed tree removals at St Kilda Road will have an adverse impact the recognised significance of the place, which is characterised by largely consistent and continuous boulevard tree planting.

The Victorian Heritage Register statement of significance for St Kilda Road states: “St Kilda Road demonstrates the characteristics of a boulevard at a high level, with consistent medians and trees extending almost the whole length of the road” (page 5). 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 is worthy of being protected as part of the MMRA Project.

Indeed, the visual and amenity impact of the proposed works cannot be overstated. 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. This proposal would transform one of Melbourne’s most recognised and valued vistas, viewed by thousands of locals and visitors moving through this

landscape daily. We submit that all care must be taken to ensure that impacts to this important place are minimised and mitigated through sensitive detailed design and construction methodology.

We submit that the current application contains insufficient details regarding the proposed reinstatement of the trees and remediation of the St Kilda Rd corridor, and that no permit should be granted until this detailed work has been undertaken. Under the heading 'Reinstatement works' Lovell Chen state:

The final functional road layout within St Kilda Road (post-construction of the Metro Tunnel) is subject to future detailed design. The intention is for the reinstatement of the boulevard form and presentation of St Kilda Road as far as is practicable however the detail of the works is yet to be resolved. (Page 30)

In our view, any application for boulevard replacement works must be accompanied by documentation of reasons for removal, proper selection of trees/species along with a strategy for subsequent management.

Compliance with MMRA Environment Performance Requirements

There is no indication within the supporting documentation that alternative construction methods for the station, or road and tram diversion works, have been considered. The Heritage Impact Statement states: "MMRA is committed to retaining as many trees as possible during the project and will continue to review opportunities to maximise tree retention through detailed design in accordance with EPR AR1" (page 22). While we acknowledge that some tree removal would be required as part of the MMRA project, we submit that this permit application does not sufficiently demonstrate that alternatives to this tree removal have been considered. Furthermore, the NTAV is concerned that this application represents the worst-case scenario of tree removal from the entire construction footprint on St Kilda Road, and that the detailed design process could see many more trees retained. In the Melbourne Metro Rail Project Environment Effects Statement, Technical Note 40, 19 August 2016, the MMRA state:

9. It should be noted that the Impact Assessment has been prepared as a "worst-case" scenario by assuming the removal of all trees within the construction footprint. EPR AR1 requires that during detailed design, potential tree impacts will be reviewed with a view to facilitating the maximum tree retention where possible. On this basis, the expectation is that the detailed design of the project will enable many of the trees nominated for removal in the EES to be retained. (Page 3)

As such, the NTAV submits that any permit for tree removals should respond to detailed designs for the Domain Station on St Kilda Road as required by the MMRA Environmental Performance Requirements. NTAV would expect that the retention of mature trees would form part of the MMRA design brief for the proposed MMRA Domain. The present application is indicative of a worst case scenario, and as such has the potential to see unnecessary tree removal, or mature trees not retained within the detailed design as a permit for their removal had already been granted.

Landscape reinstatement works

The Victorian Heritage Register statement of significance states “St Kilda Road is significant as a fine and representative example of a boulevard.” As such, we submit that the significance of the trees is understated in the Lovell Chen report, and that rather than being “contributory” (page 33) they are integral to the current and historical use and appreciation of this boulevard.

It is noted that with regard to trees in St Kilda Road, the predicted useful life expectancy of the avenue plantings is generally short (6-20 years), however approximately 40% of the trees subject to this permit have a useful life expectancy of between 30 and 60+ years which NTAV submits could be extended to 100 years. It is understood that replacement is planned within the coming decade regardless of whether Melbourne Metro Rail Project proceeds. However there are also other factors to consider in an urban environment, including amenity and shade. The community’s appreciation of the heritage significance of the avenue, and the amenity that the heritage asset provides, should be considered as part of this planning permit. We note that the St Kilda Road reserve for the current application is approximately 50 metres in width in this location, and given the large road width available to work within, the NTAV would expect that any removal in this location would be demonstrated to be completely unavoidable.

It is also understood that the area for the Domain Station on St Kilda Road will be subject to many constraints, and we submit that 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. We therefore take the position that given detailed designs for the construction of the Domain Station (including scale of works and construction methods) are not provided with the permit application, an informed decision about reinstatement landscape works cannot be made. The Lovell Chen Heritage Impact Statement notes: “Improved growing conditions for replacement trees are a component of the replacement regime and this will ensure the long-term viability of the boulevard planting and the restoration of the valued aesthetic qualities” (page 34). We submit that no supporting evidence has been provided to demonstrate how improved growing conditions will be achieved, and that further documentation is required to demonstrate that the restoring the full boulevard characteristic of St Kilda Road will be viable in the long-term.

NTAV is generally comfortable with the suggestion in the Heritage Impact Statement that a requirement for landscape reinstatement works should be included as a condition of any permit. It is noted that the Victorian Heritage Register citation for St Kilda Road states on page 5:

St Kilda Road demonstrates the characteristics of a boulevard at a high level, with consistent medians and trees extending almost the whole length of the road. ... A broad and stately thoroughfare, its intact and impressive plantings of mature Elm and Plane trees beautify the southern access to the city. The overarching tree canopies are of considerable visual appeal, provide a sense of enclosure and exemplify the aesthetic use of trees as a road design device.

The NTAV has a history of supporting the replacement of tree avenues provided well documented reasons for removal are provided, proper selection of trees/species is undertaken along with a strategy for subsequent management. As such we submit that care be taken to maintain the continuity

of St Kilda Road as a boulevard. The NTAV supports the use of advanced trees as part of reinstatement works, and the quick reinstatement of trees during phased works rather than at the completion of the project. However, NTAV notes that the expected time for replacement of amenity and heritage value to the community from advanced tree replacements works of this scale would be a minimum of 20 years.

Kerb, channel and median removal

We note that the Victorian Heritage Registration for St Kilda Road includes the roadway, medians and kerbing, many of which are of bluestone construction. We submit that any bluestone removed as part of this application should be stored and reused in the reinstatement works, as per the Lovell Chen Heritage Impact Statement, which states “The bluestone would be stored for the duration of the works and re-used during the construction of the roadway at the completion of the project” (page 29). Furthermore we submit that median reinstatement works should be consistent in form with the continuity of St Kilda Road at the northern and southern extent of registration. We recommend that this be a condition on any permit granted.

Adjacent heritage places

NTAV submits that consideration be given to the boundary between this section of St Kilda Road and the Shrine of Remembrance. We note that this section of St Kilda Road forms a significant view line and approach to the Shrine from the south.

Conclusion

The NTAV’s primary concern regarding the early works at St Kilda Road is the large scale removal of trees without adequate supporting documentation outlining reinstatement works. While we accept the need for some alteration of the St Kilda Road landscape to accommodate the MMRA project, and therefore the removal of select areas of trees, to do so without a well-documented strategic plan for their replacement and subsequent management is unsupported. It is important to maintain the recognised significance of St Kilda Road in the Heritage Victoria Registration as “an iconic boulevard which has been recognised as a place of beauty and a visually outstanding element in Melbourne’s urban landscape” (page 5). The trees of St Kilda Road also give substantial amenity and shade value to the community, a value that should be re-established in a timely manner. As such we have strong concerns about the long-term viability of St Kilda Road as a continuous boulevard should landscape reinstatement works not sufficiently replace what is proposed for removal in this application. While the Lovell Chen Heritage Impact Statement states that the MMRA intend to reinstate the landscape characteristics of St Kilda Road as part of this project, the present application does not make clear assurances that detailed plans have been made for this work. As such the NTAV encourages Heritage Victoria to ensure that the reinstatement works are consistent with or improve upon the current landscape condition of the St Kilda Road boulevard, and that less invasive construction techniques be explored prior to any permit being granted for these works.

Thank you for the opportunity to make a submission regarding this permit application. Should you have any queries regarding the above, I can be contacted at my office on 9656 9823.

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 (Acting)
National Trust of Australia (Victoria)