



6 June 2019

North East Link Inquiry and Advisory Committee  
Planning Panels Victoria  
[northeastlinkproject.ppv@delwp.vic.gov.au](mailto:northeastlinkproject.ppv@delwp.vic.gov.au)

6 Parliament Place  
East Melbourne  
VIC 3002

Email: [conservation@nattrust.com.au](mailto:conservation@nattrust.com.au)

Web: [www.nationaltrust.org.au](http://www.nationaltrust.org.au)

T 03 9656 9818

## **Re: North East Link Environment Effects Statement**

Dear Madam/Sir,

The National Trust of Australia (Victoria) appreciates the opportunity to respond to the Environmental Effects Statement (EES) for the proposed North East Link project.

The National Trust's primary concern regarding this project is the impact to environmental heritage due to widespread removal of healthy mature trees, representing a considerable loss of the amenity, visual and heritage values of trees which should not be underestimated, particularly given the cumulative effect of tree removals across all current major infrastructure projects. The expected minimum time for replacement of amenity and heritage value to the community from advanced tree replacement works of this scale would be 20 years, in addition to the significant loss of carbon sequestered by mature trees removed.

In regard to historical heritage places, we urge the North East Link Authority to take a proactive approach to the recognition of the Eastern Freeway (Stage 1), which has been assessed as being of state heritage significance, by nominating it to the Victorian Heritage Register. We also recommend a further heritage assessment of the sculpture Sentinel, and expect its values to be managed appropriately.

The National Trust opposes the removal of the Bulleen River Red Gum on Bridge Road, the 2019 Victorian Tree of the Year, and expects that all options will be considered to retain the tree. We would also consider adverse impacts on Bolin Bolin Billabong to be unacceptable, and advocate for a cautious approach to be taken in regard to risk management for this landscape, and the Yarra River landscape more broadly.

We commend the North East Link Authority's partnership with the Wurundjeri Woi-wurrung Cultural Heritage Corporation on the Urban Design Strategy, and advocate for the continuing meaningful involvement of Traditional Owners as the project progresses.

Due to the volume of documentation in the EES, and the resources available to the National Trust to respond within the exhibition timeframe, this submission does not comprehensively address all matters relating to environmental and cultural heritage impacts across the footprint of the project. The National Trust reserves the right to raise additional matters in the course of the Inquiry and Advisory Committee (IAC) hearing.

### **Urban Design Strategy**

We commend the North East Link Authority for partnering with the Wurundjeri Woiwurrung Cultural Heritage Corporation in the development of the Urban Design Strategy. This innovative approach provides a new benchmark for major infrastructure projects. We particularly support the Wurundjeri's expectation, outlined in their Foreword, that their cultural values will continue to inform the project. The continuing involvement of Traditional Owners throughout the design and construction phases should be linked with performance requirements, including the provision of adequate scope and budget as the project progresses.

The National Trust strongly supports the integration of interpretation of Aboriginal and non-Aboriginal cultural heritage across the project. The interpretation strategy should be informed by consultation and relevant councils and communities, and provide for ongoing maintenance and review.

We note that while reference images have been provided regarding urban design, no concept designs have been exhibited as part of the EES. We expect that Urban Design and Landscape Plans prepared by the contractor, including detailed landscape and heritage impact assessments, will be made available for public comment prior to approval by the Minister for Planning and at a time when feedback can be meaningfully incorporated into the project design. Urban and landscape design should be site responsive, and respond to existing landscape values.

### **Landscape and Visual Assessment**

We support the use of vegetation to screen and soften noise walls, as appropriate. The siting and design of ventilation structures should be undertaken to minimise impacts on landscape character, particularly the southern portal, which is located within the Yarra River Valley. We support the use of EPRs to require landscape impacts to be minimised both during construction, and in the long-term.

### **Historical Heritage**

#### **Bulleen River Red Gum**

The National Trust opposes the removal of the River Red Gum (*Eucalyptus camaldulensis*) located on Bridge Street, in Bulleen. This tree was added to the National Trust's Register of Significant Trees in the 1980s, after it was saved from removal by residents when the adjacent service station was constructed.

The tree is estimated to be over 300 years old, and has significant environmental value. It also has a high degree of contemporary social attachment, which resulted in it being voted 2019 Victorian Tree of the Year.

All efforts should be made to develop a design and construction methodology for this interchange to enable the retention of the tree. We also advocate for an assessment of social value to be undertaken, and for the tree's heritage values to be documented, in consultation with the community. Should the removal of the tree be found to be completely unavoidable, the significance of the tree should be interpreted in an appropriate location, and timber should be made available for a purpose which benefits the community, in consultation with the local community and council.

### **Bolin Bolin Billabong**

The National Trust is concerned about the impact of the project on Bolin Bolin Billabong, particularly as a result of groundwater drawdown. We would consider any adverse impacts on Bolin Bolin Billabong to be unacceptable. Assessments of risk relating to the Billabong should take a cautious approach, with further modelling undertaken before construction commences, and strict EPRs put in place to protect the environmental and cultural values of the place.

### **Eastern Freeway (Stage 1)**

We are pleased that the heritage values of the Eastern Freeway have been assessed as part of the EES process, noting that the significance of the Hoddle Street to Bulleen Road Eastern Freeway Bridges Group was assessed to be of State significance in the 2008–10 study of concrete Bridges in Victoria prepared by Gary Vines on behalf of the National Trust of Australia (Victoria).

The National Trust strongly recommends that the North East Link Authority prepares a nomination of the Eastern Freeway (Stage 1) to the Victorian Heritage Register as a matter of priority, to ensure that the heritage values of the place are appropriately documented and managed. We note that, under comparable circumstances, St Kilda Road was nominated to the Victorian Heritage Register by the Melbourne Metro Rail Authority (now Rail Projects Victoria) to provide an opportunity for the heritage values of the boulevard to be appropriately managed. The National Trust would be pleased to provide support for such a nomination.

### **Sentinel**

We disagree with Lovell Chen's assessment that the sculpture Sentinel, by artist Inge King, is not of heritage value (Technical Report K, p 96). The sculpture is a prominent landmark, and is site specific, referencing the Mullum Mullum and Koonung Creeks. We note that King was also a resident of the municipality for the majority of her life in Australia, from 1952 until her death in 2016.

We therefore consider that Sentinel is likely to be at least of local heritage significance. Should removal be required to facilitate construction, a management, storage, and reinstatement plan should be prepared by an appropriate qualified conservator, and the work should be reinstated as close as practicable to its current location, and its prominence as a landmark maintained. This should be undertaken in consultation with Manningham Council and the National Trust. The National Trust's Public Art Expert Advisory Committee could also be made available to provide further expert advice on this matter.

### **Arboriculture**

The National Trust has concerns regarding the substantial green infrastructure is proposed to be removed across the entire footprint of the project with up to 26,000 trees degraded or removed, including up to 17,000 medium to long term viability trees (documented in Chapter 15—Arboriculture). This represents a considerable loss of the amenity, visual and heritage value of trees. Despite proposed tree replacement and offset, the significant loss of trees at this scale, especially trees of 30-50 years, cannot be underestimated. The expected minimum time for replacement of amenity and heritage value to the community from advanced tree

replacement works of this scale would be 20 years, in addition to the significant loss of carbon sequestered by mature trees removed.

We would expect that many of these trees to be removed would have a useful life expectancy of greater than 50 years and many in excess of 100 years. There are key factors regarding the value of trees to be considered in an urban environment, including amenity and shade provided by these trees, many of which are medium to long term viability trees, already providing such benefits. Our expert Significant Tree Committee advises us that the average amenity provided by these trees would have an average monetary value of \$2000-\$5000 each, depending on age, size and condition with some worth much more. This would equate the removal of tree assets across the project to be, conservatively, at a value of between \$32m and \$80m, based on an estimated removal of 16,000 trees.

We expect that tree removal would be minimised and mitigated through sensitive detailed design and construction methodology. **Every tree that can be saved, should be saved.** Should tree removal be documented to be completely unavoidable, detailed plans for landscape reinstatement works should be undertaken in consultation with the relevant local councils. This should include the use of advanced trees as part of such works, timely reinstatement of trees during phased works rather than at the completion of the project and strategies for subsequent management.

Amelioration works ensuring the quality and volume of soil as well as irrigation must also be taken into account, particularly when reinstatement takes place on temporary work sites or industrial land. Tree reinstatement and offset planting should take into account the amenity, shade and heritage value of canopy trees to local residents. Such work should therefore be undertaken to benefit such residents, rather than offset elsewhere in the project.

As a general principle, the National Trust opposes the removal of viable mature trees for temporary construction and access. All possible options should be explored to avoid the need for tree removal to be undertaken to facilitate temporary construction and access, noting that it would be many years before replacement plantings will provide the amenity and environmental benefits of mature trees.

We are pleased to see an acknowledgement of the cumulative impact of tree removals across multiple infrastructure projects currently underway in Victoria (Chapter 15, p 16). This unprecedented impact underlines the importance of the appropriate and timely re-establishment of trees.

### **Aboriginal Cultural Heritage**

We support the initiative of the cultural values mapping exercise to be undertaken by Wurundjeri (Chapter 20, p 2), particularly as it will ensure that 'additional values to those values more formally covered by the relevant legislative framework such as knowledge sharing and oral histories' will be captured as part of the works.

We note that table 20.2.5 (Chapter 20, p 12) indicates 'unregistered' places and objects of Aboriginal cultural heritage that have not been formally registered on the VAHR that could be impacted by the project. Is there an intention to proactively nominate these places for inclusion in the VAHR? This should be further discussed with the Registered Aboriginal Party and Aboriginal Victoria.

## **Environmental management framework**

The following feedback relates to proposed Environmental Performance Requirements (EPRs) relating to tree removals and reinstatement. We expect to provide further feedback on EPRs during the IAC process.

### **AR1—Develop and implement a Tree Removal Plan**

We expect any Tree Removal Plan to demonstrate that all possible options for retention have been explored, and that tree removal is the only viable option.

### **AR3—Implement a Tree Canopy Replacement Plan**

Tree reinstatement should be phased, rather than being undertaken on completion of the project. This should include the use of advanced specimens where possible.

## **Bulleen Art and Garden Nursery**

We understand that North East Link construction may impact on the Bulleen Art and Garden Nursery, which includes Sustainable Gardening Australia.

We further understand that Sustainable Gardening Australia would like a Sustainability Centre to be established with partners to continue and expand their range of training, education and information projects.

Given the investments and offsets made as a result of the West Gate Tunnel and other major infrastructure projects, we believe that support for such a centre would be an appropriate measure to contribute to the mitigation of the environmental impacts of the project.

## **Conclusion**

We look forward to the opportunity to make more detailed submissions at the IAC enquiry. For any questions relating to this submission, please don't hesitate to contact me on 9656 9802 or at [felicity.watson@natrust.com.au](mailto:felicity.watson@natrust.com.au).

Yours faithfully,



Felicity Watson  
Advocacy Manager