

17 February 2014

WestConnex Delivery Authority  
WestConnex Project  
Locked Bag 928  
North Sydney NSW 2059

Dear Sir/Madam,

**WestConnex Stage One – M4 East Motorway Concept Design**

The National Trust makes the following comments on the public display of the WestConnex Stage One – M4 East Motorway Concept Design.

It must be stated initially that this Concept Design is far too vague and ill-defined for the community to make meaningful comment and, for that comment to be used in the planning process as any form of acceptable community consultation or endorsement of the project.

Indeed most of the Trust's comments will be responding to issues that do not appear in the Concept Design and of which the general public could not be expected to be aware.

It concerns the Trust that, at the Environmental Impact Statement assessment stage of this massive project, contracts may already have been signed and commitments made to commence construction when the full impacts of the development may only be coming to the public attention.

Also, construction of this section of the motorway will increase pressures for the Marrickville/Enmore section of the WestConnex development. The National Trust, in September 2005, issued a General Alert "Motorway proposals threaten inner city Urban Conservation Areas", in regard to this section of the motorway.

For over forty years the National Trust has been commenting on inner-Sydney expressway proposals and their impacts on Sydney and its inner suburban environmental heritage.

In 1972, the National Trust opposed the North-Western and Western Expressways which would have cut a swathe through Glebe demolishing 800 homes and the property "Lyndhurst", to the steps of the Sydney Town Hall.

In September 1976, the National Trust released its *Policy Statement on Urban Freeways*, responding to the threats to Glebe posed by urban freeway proposals dating from the 1950s. This Policy was updated in July 1981 as the *National Trust Policy on Urban Freeways*, to address moves to revive and construct the then abandoned inner urban freeway system.

In 1989, the National Trust produced a discussion paper –*Towards a Transport Policy for the National Trust* which advocated a number of transport initiatives based on shifting the focus of transport provision by government towards "mass transport" and away from major road proposals.



A 1995 National Trust Policy Paper *Transport - the Heritage Implications* set down National Trust support for various actions to reduce transport pressures and indicated transport proposals that would be opposed by the National Trust.

In September, 2005 a *Trust Alert – Motorway proposals threaten inner city Urban Conservation Areas* publicised the Trust's concerns that National Trust listed Urban Conservation Areas including Enmore, Annandale and the Dacey Garden Suburb at Daceyville were threatened by motorway corridor or access proposals. A major lobbying campaign by the National Trust in the early 1990s, in conjunction with local community groups, led to the proposed above-ground M5 motorway through the Wolli Creek Valley being built underground to save this important green space and its bushland, wetlands and rainforest.

Over the past fifteen years the Trust has continued to express concern at the heritage impacts of inner urban motorway proposals and has supported mass transport options such as light and heavy rail in preference to inner urban motorways.

While acknowledging that the increased mobility and affluence of our society and an expanding population require much improved transport facilities, the National Trust opposes further motorways being brought into the inner suburbs and central business district if they threaten areas of historical, architectural, scenic and social importance.

The National Trust also opposes the loss of public parklands for inner urban motorway construction, including both permanent loss involved with a motorway route/connection ramps or shorter term alienation during the construction phase.

The National Trust believes that the provisions of public/private partnership agreements for urban motorways should be made public and that such agreements must not contain penalty provisions for compensation payments to a motorway operator if a public transport system competes effectively with the motorway.

The National Trust would oppose public/private agreements that disadvantage the public who do not choose to use the toll roads constructed under those agreements and believes that massive expenditure on motorway development will divert much needed public and private investment away from public transport development which can move large numbers of people more effectively and with much less adverse heritage impact.

The constant daily movement of large transport trucks severely degrades the urban environment and the National Trust urges that rail transport should be the preferred means for transporting container goods related to Port Botany and Sydney Airport. The Trust would oppose motorway proposals which promote increased large truck movements through urban precincts, particularly those with heritage significance.

The National Trust acknowledges that inner city motorway development will be inextricably linked to residential/commercial redevelopment of higher densities in the zones adjoining the motorway and consequently, would oppose such development, or elements of that redevelopment when it;

- Impacts upon or degrades the values of adjoining Heritage Conservation Areas,
- involves the demolition of Listed Heritage Items,
- involves the demolition of places which have been removed from Heritage Lists on non heritage-based grounds,
- involves the demolition of places which, in the Trust's view are of indisputable heritage significance, but which have been denied statutory heritage recognition.

The WestConnex Stage One – M4 East Motorway Concept Design lacks detail and information and it is not possible to determine its impacts on the Environmental Heritage along the proposed route and particularly the impacts of the entry/exit portals and likely construction depots.



However, it has come to the notice of the National Trust, (not through the exhibited documentation) that portal construction will have major impacts on two important heritage items:-

1. "Yasmar", 185 Parramatta Road, Haberfield, listed on the National Trust Register in May, 1976,  
and
2. "Ashfield Park", listed on the Trust Register in March, 1986.

"Yasmar" was also listed on the State Heritage Register in February, 2000 –

*"The site of Yasmar survives as a rare example of a suburban villa in its garden setting that remains in a relatively intact condition. Yasmar is the only relatively intact villa house estate remaining on Parramatta Road, the oldest roadway in Australia, commenced in 1792. Other great estate houses in the vicinity no longer exist - Annandale 1808, Elswick 1805-25, Dobroyde, Ashfield Park 1820s. The house, stables and garden survive in layout and in relation to each other as originally intended. For these reasons the site is rare."*

The Trust understands that the front garden is proposed to be destroyed for the construction of a portal for the WestConnex expressway. Either the proponents are unaware of the significance and statutory heritage recognition for this property or are determined to proceed regardless.

It is also understood that Ashfield Park, the largest Victorian period (1879) park in the Ashfield / Haberfield Area is directly impacted by a portal construction and is also proposed in its entirety as a construction depot for the duration of the WestConnex construction period. Again, this demonstrates an extraordinary lack of concern by the expressway proponents on the impacts of this development on the historic and landscape heritage of this area.

Also of great concern to the Trust is the State Significant Infrastructure Application Report prepared by the WestConnex Delivery Authority. This document contains Attachment B1 – Items of non-Aboriginal heritage located within the study area.

The attachment lists 136 Items of Environmental Heritage, but "Ashfield Park" is missing from the list despite it being listed as Item 237 in the Ashfield Local Environmental Plan 1985 and again, as Item 272 in the Ashfield Local Environmental Plan 2013.

In view of the general and specific concerns set out above, the National Trust must reject the "concept design" and the associated planning approval process associated with the "concept design."

It is not possible for the community to make meaningful comment on this massive construction proposal with so little information made public and when key environmental and heritage impact information is withheld.

Yours sincerely

Graham Quint  
Director - Advocacy