

## **INQUIRY INTO WINDSOR BRIDGE REPLACEMENT PROJECT**

**Organisation:** Graham Edds and Associates

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25 January 2018

NSW Parliament Legislative Council  
Portfolio Committee No 5 – Industry and Transport

**RE ; Inquiry into the Windsor Bridge Replacement Project (WBRP)**

Dear Hon Robert Brown MLC and the Legislative Council Committee,

Graham Edds and Associates, a well recognised conservation architecture practice based in the Hawkesbury specialising in the protection and enhancement of Australia's early heritage places we feel compelled to voice our disgust and raise valid concerns regarding the WBRP of which you are investigating.

We provide our CV to further establish our expertise in consulting to Government, business and private individuals as well as leading conservation management teams of multi-disciplinary heritage consultants to historically research, physically investigate, establish cultural significance and recommend policies and procedures for the restoration, ongoing care and / or adaptive reuse on some of the State recognised heritage places within NSW. To summarise just a few, we led conservation actions for Elizabeth Farm, Harris Park, Parramatta c1794, Australia's earliest remaining colonial farmhouse for the Historic Houses Trust of NSW for fourteen years; have led and provided conservation advice on many Hawkesbury places such as Windsor Court House c1822, Australia's first purpose built court house, for the NSW Attorney Generals Department; fabric investigations of Howe House, Thompson Square c1820 for Hawkesbury City Council; the stabilisation of Lynwood farmhouse, Pitt Town c1806 and conservation advice to St Matthew's Anglican Church and Precinct from 1817 onward for over 24 years.

Our CV also establishes our vast expertise and experience in preparing Conservation Management Plans as the recognised guiding document for future development within historic places. We have prepared these for many Government Departments and Local Council areas, some of these include: National Parks and Wildlife Service; the NSW Attorney Generals Department; NSW Police Department; NSW Fire Brigades; Sydney Catchment Authority; Department of Planning; NSW Heritage Office; Parramatta City Council; Hawkesbury City Council; Blacktown City Council; Fairfield City Council; Wollongong City Council as well as Council area heritage studies throughout NSW. Refer to Appendix A.

We trust that the above reinforced by our CV establishes our credentials and expertise as heritage practitioners and the ability of providing a meaningful submission to this inquiry.

This response will focus on some inadequacies of the project assessment process from its inception and some of the perceived adverse heritage impacts:

- The preparation of a Conservation Management Plan (CMP) to guide any new structures and / or alterations within historic precincts:  
**To this day the WBRP does not have a prepared CMP completed yet even though it is usual practice for any project to be guided by this fundamental leading document.** It is normal practice for Local Council's and the NSW Heritage Council to require this document's preparation before major proposal are designed or a development proposal is even to be considered by either relevant governing authority. The Roads and Maritime Services (RMS) and the WBRP has put the “cart before the horse”, the NSW Minister for Planning had approved the project on 20 December 2013 prior to the design of the replacement bridge and the proposed landscape refurbishment of the Thompson Square central area being completed. Today, the bridge design is still not complete. **So I would be compelled to ask how the Minister could approve a project without fully understanding what is being considered for approval?** Not having prepared a comprehensive CMP prior, the RMS have not done their due diligence in understanding the place, the heritage values of Thompson Square to the community locally, nationally and internationally. Nor have they researched and understood the true archaeological potential of the place, evidenced by the RMS indicating that the archaeology recently uncovered was not discovered in earlier stages of archaeological investigations and did not know about its location in the square, yet a report as early as 1992 by a learned archaeologist Ted Higginbotham knew of the drain and reported that the brick barrel drain now found in TS was from the early 19<sup>th</sup> century and dates the drain at 1814 within a comparative analysis discussing another drain reported within the Royal Botanical Gardens document. *(Refer to a copy of this report within the link provided [http://nswaol.library.usyd.edu.au/view?docId=pdfs/13206\\_ID\\_Higginbotham1992LadyMacquariesRdBrickCulvertArchAssess.pdf;query=barrel%20drain%20;brand=default](http://nswaol.library.usyd.edu.au/view?docId=pdfs/13206_ID_Higginbotham1992LadyMacquariesRdBrickCulvertArchAssess.pdf;query=barrel%20drain%20;brand=default)).* To even consider putting a bridge through a historic precinct it is imperative to know and assess whether the structure can be supported in the proposed location. Hence it is my considered opinion that these investigations must be carried out prior to any development of this magnitude being considered. This due diligence seems not to have been carried out yet development approval has been granted.
- Strategic Conservation Management Plan (SCMP)  
The RMS have recently commissioned is a SCMP that in my professional opinion is flawed as a document as its brief to the consultant team restricted the historic research and physical analysis to the central green space of Thompson Square and only to the front fence alignment of the surrounding properties. In doing so, the SCMP and has not made any assessment of the surrounding Colonial Georgian buildings from the early 19<sup>th</sup> century that historically and physically form the crux of a civic square being regarded as a civic square. *(Refer to Thompson Square, Windsor NSW Strategic Conservation Management Plan – Volume 1 Site Identification, Historical Background and Heritage Status; Final Draft March 2017 page 7 and Figure 2 Aerial indicating the location of the SCMP study area.)* The State Heritage Register Permanent Conservation Order boundaries identify the historically significant boundary for Thompson Square as the rear boundary of the surrounding properties and as recorded in history by Governor Lachlan Macquarie in January 1811 as the boundary for Thompson Square. *(This area has been identified within the SCMP Figure 5 page 17 and identified in historical text page 75 and 76)*

- State Significant Infrastructure identification:**  
 From 2009 the NSW Heritage Council had repeatedly advised the then RTA that their preference was to refurbish the existing bridge. By October 2011 the NSW Heritage Council were advising that they were unequivocally opposed to the Windsor Bridge Replacement Project Option 1 for the 'irrecoverable damage' it would do to Windsor and Thompson Square. Of particular concern is the process since October 2011 which has bypassed established heritage protection controls including that the State Government classed the project as State Significant Infrastructure (SSI) and in doing so silenced the NSW Heritage Council as the heritage watchdog. This action by the Government is unacceptable as it seems that the existing Windsor Bridge was not about to collapse, confirmed by two respected retired former RTA bridge engineers, and the reason for the project's classification as SSI has given the perception that it was used to silence the NSW Heritage Council's objections to the WBRP. Some 6 years following this SSI classification the bridge still functions adequately and with increased traffic loadings indicating that this project was not so important for NSW to go ahead immediately nor warrant this SSI classification.
- Heritage Impacts:**  
 As a practising conservation architect we concur with the determination from the NSW Heritage Council that the WBRP will cause irrecoverable damage to the historic significance of the square as well as unknown damage to the surrounding Colonial Georgian buildings that form a very important part of the civic square and the archaeology that is below ground. It has not been established what construction activity will cause nor what affect post construction vibrations through the foundation soils will have on the nearby historic buildings and the underlying archaeology throughout the square. From my experience these are very likely to cause irrecoverable physical damage. The visual effect of a large replacement bridge through the centre of the square can only destroy the visual amenity of the space and the noise from increased traffic through the square is expected to make the ambience so uncomfortable that it will be untenable for the community to picnic and relax.
- Adverse Noise Impact on Residents:**  
 The RMS have recognised the excessive noise impact on those residential historic properties within Old Bridge Street as they have offered and been investigating installing double glazing to doors and windows. It is my considered professional opinion as a conservation architect that installing double glazing within 19<sup>th</sup> century doors and windows will not provide an acceptable noise reduction without replacing the complete door or window with modern replacements. These unnecessary fabric replacements will lessen the historic significance of the place and prove to be unacceptable.
- National Heritage Listing of Thompson Square:**  
 Leading organisations have written letters of support for the National Heritage Listing of Thompson Square as early as 2013 as they believe that the WBRP will certainly seriously harm the heritage values of the place including the place's physical appearance. Organisations such as: the National Trust of Australia (NSW); the University of NSW School of Humanities and Language; Royal Australian Historical Society; the NSW Chapter of the Australian Institute of Architects; the Australasian Society of Historical Archaeology; well respected Architects and Heritage Consultants, Clive Lucas Stapleton and Partners; owners of the surrounding Thompson Square properties, Roderick and Megan Storie, Alan and Donna Pruedames, Dr Michael Welsh, Peter Reynolds and Gary Medina.

- Community Consultation: Specific community consultation occurred only after the decision of the RMS and Government to proceed with Option 1. A Design and Heritage Community Focus group for option 1 met on 2 November 2011. The community consultation brief was to assist with lessening the impact of the project on such a historic place. Needless to say the consultation was entirely negative resulting in the RMS vacating the community consultation process in June 2012 without any positive outcomes.

Conclusion:

It is my professional opinion that the RMS and the Liberal Government continues to play “lip service” to the Hawkesbury Community in its approach to the WBRP seemingly defying heritage legislation that is in place to protect Australia's unique heritage places.

It remains inconceivable that a major project like the WBRP could be proposed and receive Ministerial approval without firstly assessing the places heritage significance to the levels required by completing a conservation management plan to guide this proposal. Instead the proposal has seemingly been promoted by Government without much consideration of the Hawkesbury community and the cultural significance of Australia's only 18<sup>th</sup> century civic square including its European archaeology and the underlying Aboriginal archaeology within the underlying Aeolian sand dune.

We look forward to your considered determination on this proposal.

Should you request it, I would be prepared to further discuss the WBRP at the inquiry.

Yours Sincerely,

Graham Edds

NSW Architects Registration Board No 4710