Transport for NSW

Beaches Link and Gore Hill Freeway Connection

Appendix H – Supplementary non-Aboriginal heritage assessment

November 2021

Contents

1 Introduction

1.1 Background

This supplementary non-Aboriginal heritage assessment has been prepared by Jacobs Group (Australia) Pty Ltd as part of the Beaches Link and Gore Hill Freeway Connection project ('the project') submissions report. A description of the project can be found in Section A1.2 of this submissions report.

Individual statements of heritage impact were prepared for 14 non-Aboriginal heritage items of significance that would be potentially impacted by the project in Appendix J (Technical working paper: Non-Aboriginal heritage) of the environmental impact statement. Significance assessments, along with history and description, of each heritage item was presented in Annexure A of Appendix J (Technical working paper: Non-Aboriginal heritage).

The environmental impact statement was placed on public exhibition from 9 December 2020 to 1 March 2021. Public exhibition provided the community, interested parties and key stakeholders (including Government agencies and Councils) with an understanding of the project and the opportunity to make a submission on the environmental impact statement.

A submission was received from Northern Beaches Council which requested consideration of two potential heritage items that had not been considered in the environmental impact statement, and are located along Wakehurst Parkway within the construction footprint (Canberra Concrete Bus Shelter and Wakehurst Parkway Memorial). Both potential heritage items are not listed on any heritage register or database. In addition, Northern Beaches Council raised concerns about the level of impacts at Frenchs Bullock Track. Refer to Figure 1-1 for a locality map showing these items.

1.2 Purpose of this assessment

The purpose of this supplementary non-Aboriginal heritage assessment is to:

- Provide a significance assessment and statement of heritage impact for the two potential heritage items – Canberra Concrete Bus Shelter and Wakehurst Parkway Memorial
- Provide additional discussion and an updated impact assessment of the Frenchs Bullock Track.

1.3 Approach to assessment

The same assessment methodology provided in Section 2 of Appendix J (Technical working paper: Non-Aboriginal heritage) has been applied for the Canberra Bus Shelter and the Wakehurst Parkway Memorial including significance assessment, field survey/site inspection, and impact assessment.

The significance assessment for Frenchs Bullock Track can be found in Section A.10 of Annexure A and the impact assessment in Section 5.4.11 of Appendix J (Technical working paper: Non-Aboriginal heritage). An updated impact assessment has been prepared for Frenchs Bullock Track using the assessment methodology provided in Section 2 of Appendix J (Technical working paper: Non-Aboriginal heritage). The updated impact assessment considers the latest project reference design in the vicinity of Frenchs Bullock Track. The updated reference design includes refinements to reduce impacts to the Frenchs Bullock Track, which have been carried out following exhibition of the environmental impact statement, as described in Section A4.6 of this submissions report.

Background research, significance assessment and impact assessment was prepared by Dr Karen Murphy (Technical Director – Archaeology and Cultural Heritage, Jacobs). The site inspection was carried out by Clare Leevers (Senior Heritage Consultant, Jacobs).

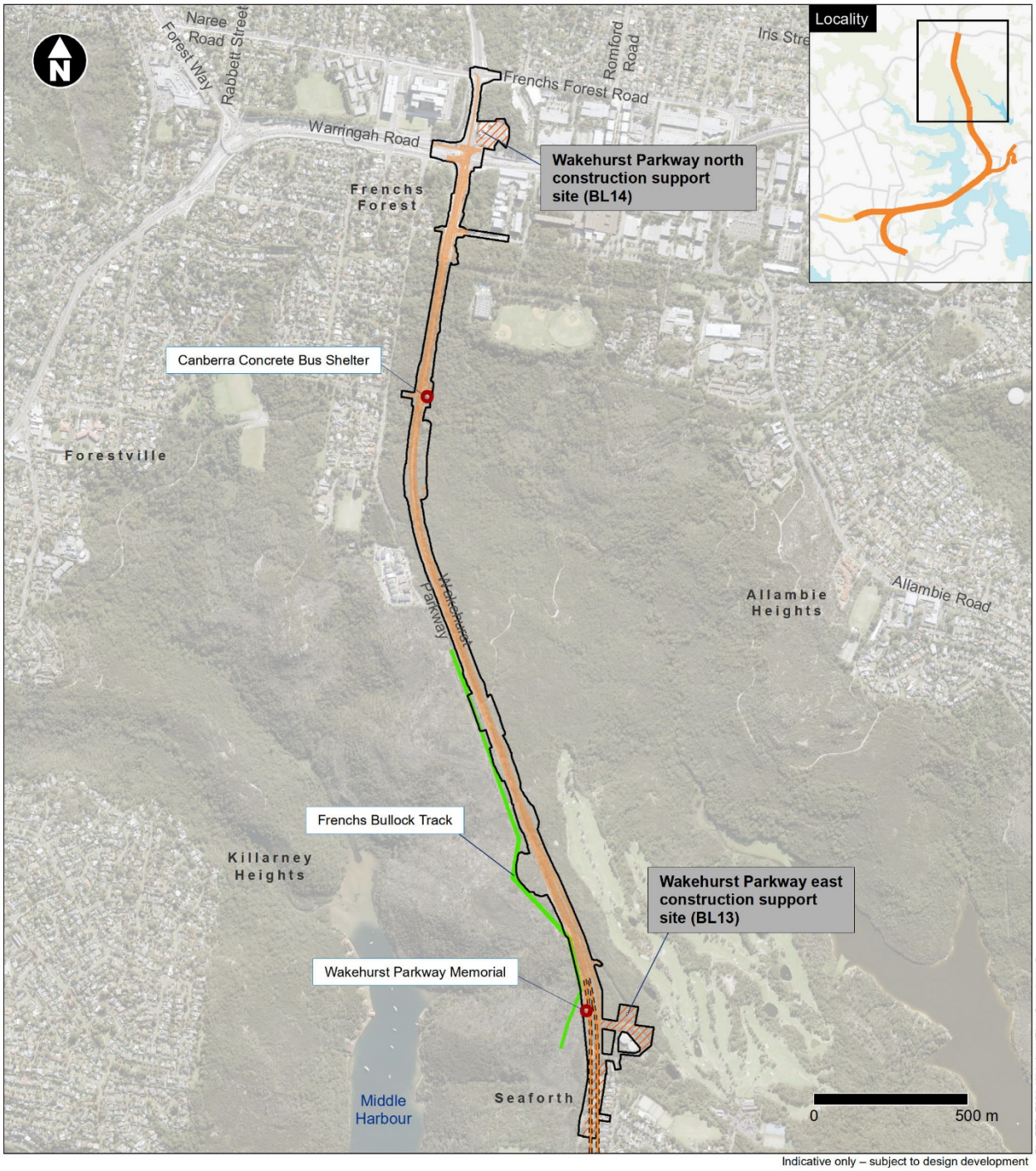

Figure 1-1 Potential and known non-Aboriginal heritage items considered in this assessment

2 Item 15: Canberra Concrete Bus Shelter, Frenchs Forest

2.1 Significance assessment

Table 2-1 Canberra Concrete Bus Shelter details

Name/s	Location	Register	Register ID	Significance level
Canberra Concrete Bus Shelter	Wakehurst Parkway, Frenchs Forest Opposite Yarraman Avenue walkway	-	-	Local

The Canberra Concrete Bus Shelter on Wakehurst Parkway is not listed on any heritage register or database. For the purposes of this assessment, it has been assessed by Jacobs as being of local significance.

The information provided below is sourced from Capital History Here (2020), ArchivesACT (2016), Architecture and Design (2019), ACTBus (2008), Gee (2016), ACT Heritage (2020), Dickinson (2021), and Michelle Richmond (pers. comm., December 2019).

2.1.1 History

The distinctive Canberra concrete bus shelter was designed by Clement Cummings in 1974 for the National Capital Development Commission (NCDC) in the Australian Capital Territory (ACT). The design was for a cylindrical shelter made from concrete, with fibreglass window frames on each side with Lexan windows, and a fibreglass bench (refer to Figure 2-2). The Series I concrete bus shelters were first installed in Canberra in May 1975, as part of a program to improve Canberra's public transport system. A total of 95 Series I design bus shelters were initially installed around the Canberra city at a cost of $2300 per shelter. The Canberra Times reported the roll out on 21 March 1975:

> *The first of a new type of bus shelter which the Department of the Capital-Territory hopes to in-stall at almost every bus stop in Canberra is to be completed in about a month. The first 100 shelters are expected to be installed by about August, and the department hopes to let new contracts over the next few years to provide shelters for almost all bus stops. The shelters, and the bus-only lanes on Adelaide Avenue opened on Monday, are the first visible signs of a wide-ranging program of improving Canberra's public transport which was originally planned to begin early last year. As a major part of the program, frequencies on most bus routes are expected to be increased from 30 minutes to 15 minutes late this year.*
>
> (Capital History Here 2020)

Minor amendments were made to the Series I design, with Series II having precast concrete floors and no backrest for the bench. Five different series were produced; including installation of 52 Series II shelters in 1976, 55 Series III shelters in 1977/78, 50 Series IV shelters in 1978-79, and 50 Series V shelters in 1979-80. Sporadic installations occurred throughout the 1980s and early 1990s. Since they were first installed in Canberra the shelters have been painted cream in colour, with their fibreglass window frames and benches being orange. Issues with vandalism and damage to the

Lexan windows, eventually led to many of the shelters in Canberra now being windowless (ArchivesACT 2016; Capital History Here 2020).

The designer Clement Cummings went to Canberra from his birthplace in Queensland in 1953 to study at Royal Military College Duntroon, before later studying architecture at Sydney University, graduating in 1962. Cummings took up a job in Canberra at the Department of Works, and was employed by the Prime Minister's Office in 1968 as an advisor on several office refurbishment projects. In 1971 he established his own architecture practice, undertaking projects for the National Trust, the ACT Heritage Committee, and the NSW Heritage Council. His work in the design for the concrete bus shelters around Canberra is seen as his most prominent work. The ACT Chapter of the Royal Australian Institute of Architects (RAIA) has recognised his contribution to architecture by establishing the Clem Cummings Medal in 2000 which is awarded to recognise contributions by architects and non-architects to architecture in the public interest (ArchivesACT 2016; Capital History Here 2020).

The concrete bus shelters are designed in a brutalist style. Brutalism is an architectural style that was popular from the 1950s to the 1980s, especially for civic and institutional buildings. Buildings in this style feature 'visually heavy edifices with geometric lines, solid concrete frames, exaggerated slabs, double height ceilings, massive forbidding walls, exposed concrete and a predominantly monochrome palette' (Architecture and Design 2019). While the Canberra concrete bus shelters are smaller in scale than most brutalist structures, the exposed concrete and geometric design elements are associated with this style, which can be more particularly described as Late Twentieth Century Brutalist (Apperly *et al.* 1989).

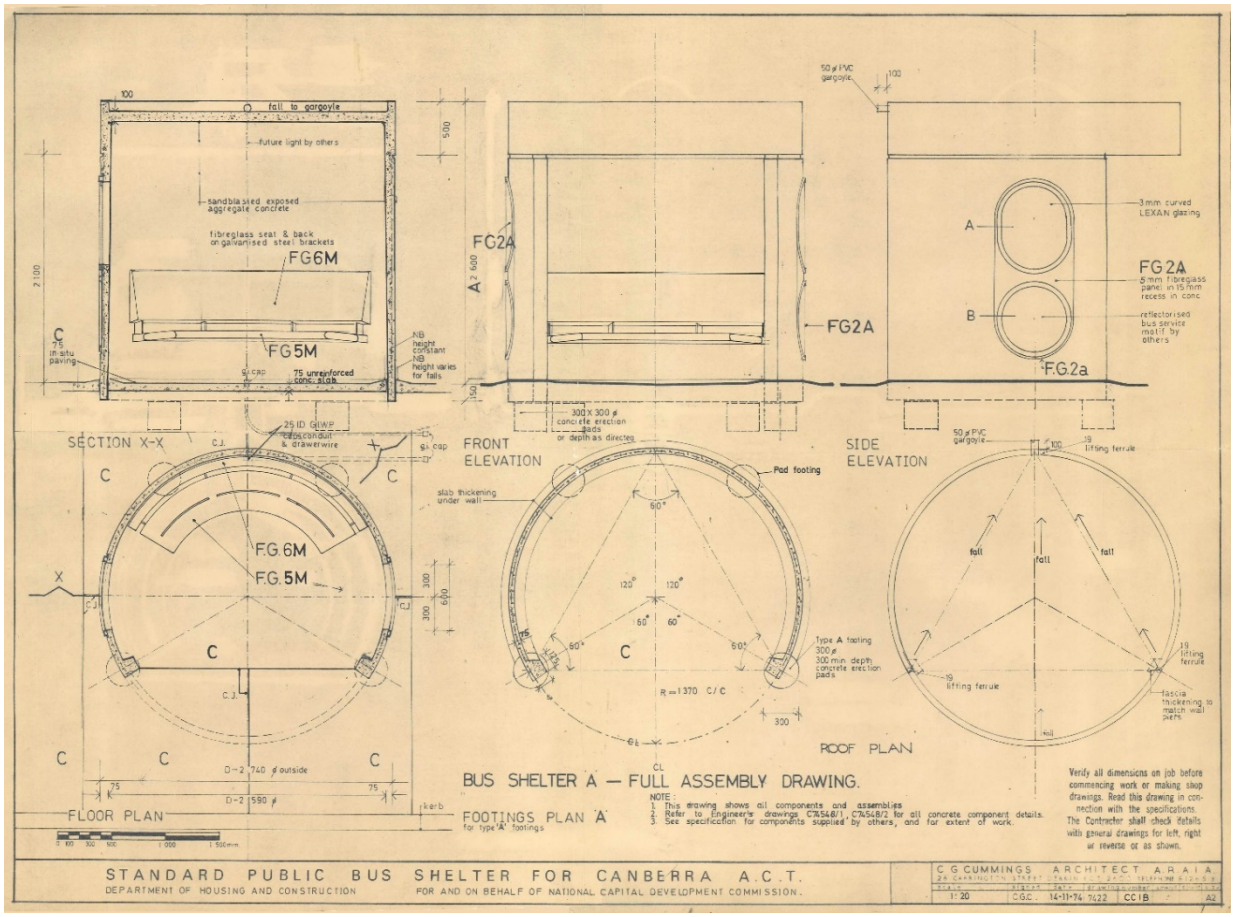

Figure 2-2 Standard Public Bus Shelter for Canberra ACT, Plans for the Series I concrete bus shelter (Archives ACT CT-CC1B)

The concrete bus shelters reflect the development of Canberra, in particular the Whitlam Government's decision for Canberra to be its model for the development of decentralised cities, to attain a vision to improve access to social services and amenity, including the provision of efficient public transport systems. The design of the brutalist style Cummings concrete bus shelter represents this progressive urban program (Capital History Here 2020).

An audit by Transport Canberra and City Services in 2016 recorded 477 bus shelters still on the Canberra bus network, with only around 20 lost during the previous 30 years due to damage and other reasons (Gee 2016).

Several examples of the Canberra concrete bus shelter are found outside of the ACT, with Bredbo, Burradoo and Tallong railway stations in NSW using them as passenger shelters, one in Maitland NSW, and an example of one modified into a public toilet in Surfers Paradise in Queensland (ACTBus 2008; Gee 2016). There are two within the Northern Beaches local government area, the one on Wakehurst Parkway, and one near the intersection of Haigh Avenue and Pringle Avenue, Belrose. Both are actively used bus stop shelters (Michelle Richmond, pers. comm., December 2019). Ben McHugh, Director of Capital Works at Transport Canberra and City Services, states that it is unknown how these concrete shelters came to be outside Canberra: '*Whether they were actually sold as different facilities through the concrete yard [that manufactured them], we haven't quite got to the bottom of. I think it makes it even more impressive that people recognise it as part of Canberra, seeing it elsewhere in the country in very limited numbers'* (Gee 2016).

The Canberra concrete bus shelters have been nominated to the ACT Heritage Register, but a decision on these is yet to be made regarding entry onto the register (ACT Heritage 2020). The date of nomination is not indicated. The Canberra Museum and Gallery held an exhibition of photographs and art works of the Canberra bus shelters, created by artist Trevor Dickinson from October 2018 to January 2019. Trevor Dickinson has also published a hard cover book of all photographs and art work of the Canberra bus shelters (Dickinson 2021).

No information has been found in relation to how, when or why a Cummings concrete bus shelter came to be or was installed on Wakehurst Parkway (or in Belrose). Information on this aspect was sought from both Northern Beaches Council and Transport for NSW in May 2021, but the history of their presence in the Northern Beaches Council area is unknown.

2.1.2 Description

The Canberra Concrete Bus Shelter is situated on the eastern side of Wakehurst Parkway approximately 520 metres south of the Aquatic Drive intersection. The item comprises cream painted concrete, with dark green painted fibreglass window frames and bench seat (Figure 2-3, Figure 2-4). It appears to be bolted to a concrete pad (Figure 2-7), with recent concreting in its interior with a slope ramp leading onto the footpath (Figure 2-6), presumably providing accessibility for passengers from the shelter to the bus. It is not clear whether the concrete pad on which it is situated is the pre-cast floor referred to in the Series II design, or whether it was a locally installed pad onto which the shelter has been fixed, however the latter appears more likely. The bench seat is backless (Figure 2-5), suggesting it is not a Series I design, but one of the later designs. Peeled paint on the bench seat and window frames reveals a faded orange colour which may be the original orange in which all the Canberra examples are manufactured (Figure 2-7, Figure 2-8). It appears that the shelter has previously had lighting installed, however these have since been removed. This differs from the Canberra examples, none of which had lighting originally installed.

The Wakehurst Parkway bus shelter is in reasonably good condition, with some minor spalling of concrete and some peeling paint.

Figure 2-3 Canberra Concrete Bus Shelter on Wakehurst Parkway, looking north

Figure 2-4 Canberra Concrete Bus Shelter on Wakehurst Parkway, looking south

Figure 2-5 Fibreglass bench seat; note no seat back

Figure 2-6 Interior of bus shelter and newly concreted ramp and interior

Figure 2-7 Exterior of bus shelter showing attachment to concrete pad, and revealing orange colour beneath green paint

Figure 2-8 Close up of bench seat showing orange colour beneath green paint

2.1.3 Significance assessment

Table 2-2 Canberra Concrete Bus Shelter, Frenchs Forest details

Criterion	Assessment
A – Historical significance	The design and prevalence of the Canberra Concrete Bus Shelter reflects the development of Canberra, in particular the Whitlam Government's decision for Canberra to be its model for the development of decentralised cities. This is particularly the case for the large number of bus shelters distributed throughout Canberra. While this demonstrates historical significance for Canberra and the ACT, this is not the case for the single example that is present on Wakehurst Parkway. The history behind why, how and when the Canberra Concrete Bus Shelter came to be installed on Wakehurst Parkway is not known, and therefore it currently does not demonstrate an important historical course, pattern or process of importance to the history of the local area nor of NSW. Does not meet this criterion.
B - Historical association	The Canberra Concrete Bus Shelter is well known for being designed by Clem Cummings, an architect who trained at University of Sydney, and has since been recognised for his contribution to architecture by the ACT Chapter of the Royal

Criterion	Assessment
	Australian Institute of Architects (RAIA) who established the Clem Cummings Medal in 2000 to recognise contribution to architecture in the public interest. While this demonstrates the importance of Clem Cummings and his association with the design of the concrete bus shelter, the importance of him and his work is tied to the history of the ACT and Canberra, rather than to the history of NSW or Sydney. Although Cummings trained at University of Sydney, this is not a sufficient association to demonstrate any importance to NSW's or the local area's cultural history. Does not meet this criterion.
C – Aesthetic significance/ technical/creative achievement	The Canberra Concrete Bus Shelter is a good example of the brutalist architectural style, at a relatively small scale. While the Canberra concrete bus shelters are smaller in scale than most brutalist structures, the exposed concrete and geometric design elements are associated with this style. They are also a distinctive, landmark design that are instantly recognisable as being the bus shelters designed for Canberra, even when situated outside of the ACT. Meets this criterion at a local level.
D – Social significance	The Canberra Concrete Bus Shelter is not associated with any identifiable community or cultural group in the local area. While the Northern Beaches Council has indicated that it is of importance to them and/or the local area, there is not sufficient evidence to demonstrate a strong or special association for social, cultural or spiritual reasons. Does not meet this criterion.
E – Research potential	The Canberra Concrete Bus Shelter does not have the potential to yield new or further scientific or archaeological information. Archives ACT holds the original design plans for the Cummings-designed bus shelters and as such there would not be any additional information available from the actual physical example of the bus shelter on Wakehurst Parkway. Does not meet this criterion.
F – Rarity	There are 477 concrete bus shelters still extant in Canberra (as at 2016), and while examples outside of Canberra are not common or widespread outside of the ACT, the sheer number of other good examples of the type elsewhere in Australia means that the one on Wakehurst Parkway is not considered to be rare. Does not meet this criterion.
G – Representativeness	The Canberra Concrete Bus Shelter could be considered as a reasonable example of a modern-design Brutalist bus shelter which has the principal characteristics of a class or group of items. However, given that this example has been modified, is not intact and does not retain all original elements, it is not really able to be described as being outstanding or of particular significance. Does not meet this criterion.

2.1.4 Statement of significance

The Canberra Concrete Bus Shelter on Wakehurst Parkway at Frenchs Forest is not listed on any heritage register or database and for the purposes of this assessment has been assessed as being of significance at a local level.

The Canberra Concrete Bus Shelter design is a good example of the brutalist architectural style, at a relatively small scale. While the Canberra concrete bus shelter design is smaller in scale than most brutalist structures, the exposed concrete and geometric design elements are associated with this style. They are also a distinctive, landmark design that are instantly recognisable as being the bus shelters designed for Canberra, even when situated outside of the ACT. It meets criterion C (aesthetic significance/technical/creative achievement) at the local level.

The design and prevalence of concrete bus shelters in Canberra clearly demonstrate the development of Canberra, in particular the Whitlam Government's decision for Canberra to be its model for the development of decentralised cities. However, this does not apply to the single example on the Wakehurst Parkway. It does not demonstrate an important historical course, pattern or process of importance to the history of the local area nor of NSW. The Canberra Concrete Bus Shelter does not meet any other criterion at either the state or local level.

2.2 Statement of heritage impact

2.2.1 Proposed works

The project works in the vicinity of the Canberra Concrete Bus Shelter on Wakehurst Parkway include the upgrade and integration works along the Wakehurst Parkway, at Frenchs Forest. This includes the widening of the Wakehurst Parkway from one lane in each direction to two lanes in each direction and construction of the shared user underpass. This would require the removal or demolition of the Canberra Concrete Bus Shelter. It is not practicable to redesign the project in this location to avoid the Canberra Concrete Bus Shelter, due to design and engineering constraints at this location of the Wakehurst Parkway. Figure 2-9 provides the location of the bus shelter in relation to project works.

2.2.2 Impact assessment and management measures

There would be direct physical impact to the Canberra Concrete Bus Shelter from the project as it would be required to be removed to enable the widening of the Wakehurst Parkway. The Bus Shelter is however of potential local heritage significance only for its brutalist design and distinctive, easily recognisable style, and not for its particular location along the Wakehurst Parkway. It could be situated elsewhere within the Northern Beaches Council local government area while still retaining its heritage values.

Transport for NSW has committed to removing and retaining the Canberra Concrete Bus Shelter with the intention of reusing the shelter during the operation of the project, or otherwise repurposing the shelter, in consultation with Northern Beaches Council. The following management measures are recommended to be carried out prior to the commencement of construction of the project:

- An archival photographic recording of the Canberra Concrete Bus Shelter located on Wakehurst Parkway should be carried out in accordance with the *Photographic Recording of Heritage Items Using Film or Digital Capture* guideline. Archival recording should be completed prior to any works that have the potential to impact upon the item and deposited with Northern Beaches Council and other appropriate stakeholders as determined during further design development
- Consultation with Northern Beaches Council should be carried out regarding options for an appropriate new location for the Canberra Concrete Bus Shelter currently located on Wakehurst

Parkway. Where practicable, the Canberra Concrete Bus Shelter should be relocated to a suitable location on Wakehurst Parkway or otherwise within the Northern Beaches Council area, and ideally continue to be used as a bus shelter. Repurposing of the Shelter to a use other than a bus stop shelter could be considered, with an appropriate use which retains its aesthetic significance

Where relocation of the Canberra Concrete Bus Shelter to a new location and/or repurposing of the Canberra Concrete Bus Shelter is deemed practicable, this should be carried out under the supervision of an appropriately qualified heritage consultant and with appropriate engineering advice. The ACT Government may be able to provide such engineering advice if required.

Figure 2-9 Non-Aboriginal Heritage – Current location of the Canberra Concrete Bus Shelter

3 Item 16: Wakehurst Parkway Memorial, Killarney Heights

3.1 Significance assessment

Table 3-3 Wakehurst Parkway Memorial details

Name/s	Location	Register	Register ID	Significance level
Wakehurst Parkway Memorial	Wakehurst Parkway, Killarney Heights About 120 metres north of the intersection with Kirkwood Street, Seaforth	-	-	Local

The Wakehurst Parkway Memorial is not listed on any heritage register or database. For the purposes of this assessment, it has been assessed by Jacobs as being of local significance.

The information provided below is sourced from Department of Main Roads (1946), Monument Australia (2021), Cuneen (2002), and NSW Archives (1946).

3.1.1 History

The Wakehurst Parkway was formally opened on 22 March 1946 by the Premier of NSW, the Hon WJ McKell MLA, with a commemorative plaque at each end of the new roadway (Figure 3-10, Figure 3-11). The road was named in honour of Lord Wakehurst who was Governor of NSW from 1937 to 1946. The Governor was known for his interest in the development of NSW and its natural beauty, with Wakehurst Parkway being the first road to have the term 'parkway' as part of its name, a term that at the time was applied to 'a road of exceptional width, including in its width areas in their natural state or developed as strips of parkland.' Upon its opening, it was described as follows:

> *Throughout its length the road is flanked by natural bushland amid attractive scenery, and it is for the purpose of preserving these that a width of road reservation of 240 feet has been acquired through other than Crown land. In this width there will be ample area remaining for trees and shrubs even should it be necessary to provide ultimately for eight lanes of traffic.*
>
> (Department of Main Roads 1946)

Much of the Wakehurst Parkway was constructed using employment relief labour. Work commenced late in 1939 and progressed well until work ceased due to increased labour demands for the effort during World War II. Construction started again in March 1945, with completion and opening the following year in 1946 (Department of Main Roads 1946; Monument Australia 2021).

Lord Wakehurst (John de Vere Loder, 2nd Baron of Wakehurst) was born in London in 1895. He was commissioned in the Royal Sussex Regiment during World War I and serviced at Gallipoli, Egypt and Palestine. He later worked in the Foreign Office and with the League of Nations, before being appointed as Governor of NSW in 1937. He and his family moved to Australia to take up this appointment. Described as an 'outdoor man', he and his wife entered enthusiastically into local activities, with both helping to fight bushfires near Moss Vale in 1940. During World War II extra duties required of him and his wife saw them involved in the formation of the Women's Australian

National Services, the promotion of inter-denominational church co-operation, and visiting Australian troops in the South West Pacific Area with General Sir Thomas Blamey. Politically he was described as a moderate, even left-wing Tory who was close to Sir William McKell who became Labor Premier in May 1941, and who was responsible for opening the Wakehurst Parkway. Wakehurst's term was extended to January 1946 and at its completion he was the longest-serving Governor of NSW, and was the last non-Australian born Governor in NSW (Cuneen 2002; Monument Australia 2021).

Figure 3-10 Official opening of Wakehurst Parkway, March 1946, showing the memorial subject of this assessment at Killarney Heights (NSW Archives FL121108 / NRS-20221-1)

Figure 3-11 Official opening of Wakehurst Parkway, March 1946, showing the memorial not impacted by the project at the northern end of the Parkway at North Narrabeen. Premier McKell to immediate right of plaque. (NSW Archives FL121052 / NRS-20221-1)

3.1.2 Description

The Wakehurst Parkway Memorial is situated towards the southern end of Wakehurst Parkway at Killarney Heights, on the western side of the roadway about 120 metres north of the intersection with Kirkwood Street, Seaforth (Figure 3-12, Figure 3-13).

The Memorial is made of dressed sandstone blocks (referred to as a cairn), with a metal plaque attached to its eastern side facing Wakehurst Parkway. It is about 2.4 metres in height. The south west side of the stone memorial is resting on a concrete slab base, while on the north side of the monument the base is cut into the sandstone outcropping at the site (Figure 3-14). The site is currently surrounded by thick shrubs and vegetation and is not easily accessible, with no pedestrian footpath provided on either side of Wakehurst Parkway. The stone of the Memorial and the metal plaque appear to be in good condition, with some discolouration apparent on both.

The plaque on the Memorial reads as follows:

COMMEMORATING

THE

NEW SOUTH WALES GOVERNORSHIP

OF

THE LORD WAKEHURST K.C.M.G.

8TH APRIL 1937 TO 8TH JANUARY 1946

WAKEHURST

PARKWAY

CONSTRUCTED BY

DEPARTMENT OF MAIN ROADS N.S.W.

OPENED ON 22ND MARCH 1946 BY

THE HON. W.J. McKELL, PREMIER

THE HON. M. O'SULLIVAN	D. CRAIG
MINISTER	COMMISSIONER
FOR TRANSPORT	FOR MAIN ROADS

There is also what appears to be a permanent survey marker, identified with the number 587 embedded in the sandstone about 650 millimetres north east of the north east corner of the Memorial (Figure 3-15).

Figure 3-12 Wakehurst Parkway Memorial, looking west

Figure 3-13 Wakehurst Parkway Memorial, looking south west

Figure 3-14 Wakehurst Parkway Memorial showing sandstone outcropping and survey marker location in foreground, looking south west

Figure 3-15 Survey marker beside Wakehurst Parkway Memorial

3.1.3 Significance assessment

Table 3-4 Wakehurst Parkway Memorial details

Criterion	Assessment
A – Historical significance	The Wakehurst Parkway Memorial commemorates the NSW governorship of Lord Wakehurst, the then longest serving governor of NSW. It also commemorates the opening of the Wakehurst Parkway. The Governor was known for his interest in the development of NSW and its natural beauty, with Wakehurst Parkway being the first road to have the term 'parkway' as part of its name, denoting its scenic nature and setting. Meets this criterion at a local level.
B - Historical association	The Memorial and the naming of the road are associated with Governor Wakehurst, at the time, the longest serving governor of NSW. Meets this criterion at a local level.
C – Aesthetic significance / technical/creative achievement	While the stone Memorial is substantial in nature, it is of a relatively typical design and structure, and not particularly outstanding in terms of its aesthetic significance. Does not meet this criterion.
D – Social significance	The Wakehurst Parkway Memorial is not associated with any identifiable community or cultural group in the area. While the Northern Beaches Council has indicated that it is of importance to them and/or the local area, there is not sufficient evidence to demonstrate a strong or special association for social, cultural or spiritual reasons. Does not meet this criterion.
E – Research potential	The Wakehurst Parkway Memorial does not have the potential to yield new or further scientific or archaeological information. Does not meet this criterion.
F – Rarity	A sampling of the NSW State Heritage Inventory suggests that while memorials in general are common, there are only a few associated with prominent politicians and those associated with the opening of roadways at the time of increasing car usage are even less commonly recognised. As an early roadway memorial, the Wakehurst Parkway Memorial could be considered rare. Further comparative research could confirm this, although this is beyond the scope and requirements of this study. The Memorial at the northern end of the Wakehurst Parkway would likely have similar significance, but is not listed and has not been assessed here. Potentially meets this criterion at a local level.
G – Representativeness	While the Memorial could be considered representative of memorials in general, its simple nature is not of particular significance. Does not meet this criterion.

3.1.4 Statement of significance

The Wakehurst Parkway Memorial is not listed on any heritage register or database and has been assessed as being of significance at a local level. The northern memorial is included in Monument Australia's comprehensive inventory of civic monuments, but its southern partner is not mentioned.

The Wakehurst Parkway Memorial commemorates the NSW governorship of Lord Wakehurst during World War II. It also commemorates the opening of the Wakehurst Parkway. The Governor was known for his interest in the development of NSW and its natural beauty, with Wakehurst Parkway being the first road to have the term 'parkway' as part of its name, denoting its scenic nature and setting. The Memorial and the naming of the road are associated with Governor Wakehurst, at the time, the longest serving governor of NSW. A sampling of the NSW State Heritage Inventory suggests that while memorials in general are common, there are only a few associated with prominent politicians, and those associated with the opening of roadways at the time of increasing car usage are even less commonly recognised. As an early roadway memorial, the Wakehurst Parkway Memorial could be considered rare.

3.2 Statement of heritage impact

3.2.1 Proposed works

The project works in the vicinity of the Wakehurst Parkway Memorial include the upgrade and integration works along the Wakehurst Parkway, at Killarney Heights. This includes realignment of Wakehurst Parkway and construction of the cut and cover and trough structure to connect the Beaches Link tunnel on and off ramps to and from Wakehurst Parkway. These works would require the removal of the Wakehurst Parkway Memorial. It is not practicable to redesign the project in this location to avoid the Wakehurst Parkway Memorial, due to design and engineering constraints at this location of the Wakehurst Parkway. Figure 3-16 provides the location of the memorial in relation to project works.

3.2.2 Impact assessment and management measures

There would be direct physical impact to the Wakehurst Parkway Memorial from the project as it would be required to be removed to enable the realignment of the Wakehurst Parkway and construction of the cut and cover and trough structure to connect the Beaches Link tunnel on and off ramps.

The Memorial is of potential local heritage significance for its association with the Wakehurst Parkway more broadly, rather than for its particular current location. It could be situated elsewhere within the Northern Beaches Council local government area, in close proximity to Wakehurst Parkway, while still retaining its heritage values.

Transport for NSW have committed to removing and retaining the Wakehurst Parkway Memorial and relocating it to a more appropriate publicly accessible location adjacent the shared user path on the eastern side of Wakehurst Parkway. The following environmental management measures are recommended to be carried out prior to the commencement of construction of the project:

- An archival photographic recording of the Wakehurst Parkway Memorial should be carried out in accordance with the *Photographic Recording of Heritage Items Using Film or Digital Capture* guideline. Archival recording should be completed prior to any works that have the potential to impact upon the item and deposited with Northern Beaches Council and other appropriate stakeholders as determined during further design development
- Consultation with Northern Beaches Council should be carried out regarding options for an appropriate new location for the Wakehurst Parkway Memorial along Wakehurst Parkway. Where practicable, a location alongside the Wakehurst Parkway at the southern end of the roadway in a publicly accessible area would be an ideal location, so as not to intrude on the existing North Narrabeen Wakehurst Parkway Memorial at the northern end of the roadway

Where relocation of the Wakehurst Parkway Memorial to the new location is deemed practicable, this should be carried out under the supervision of an appropriately qualified heritage consultant and an appropriately qualified and experienced stonemason

- The entry for the two monuments on the Monument Australia website (https://monumentaustralia.org.au/) should be updated to reflect the heritage assessment and the changed location of the southern monument
- Consultation should be carried out with NSW Spatial Services to carry out work in the vicinity of survey marks to be removed as part of the project, and to establish new survey marks as necessary.

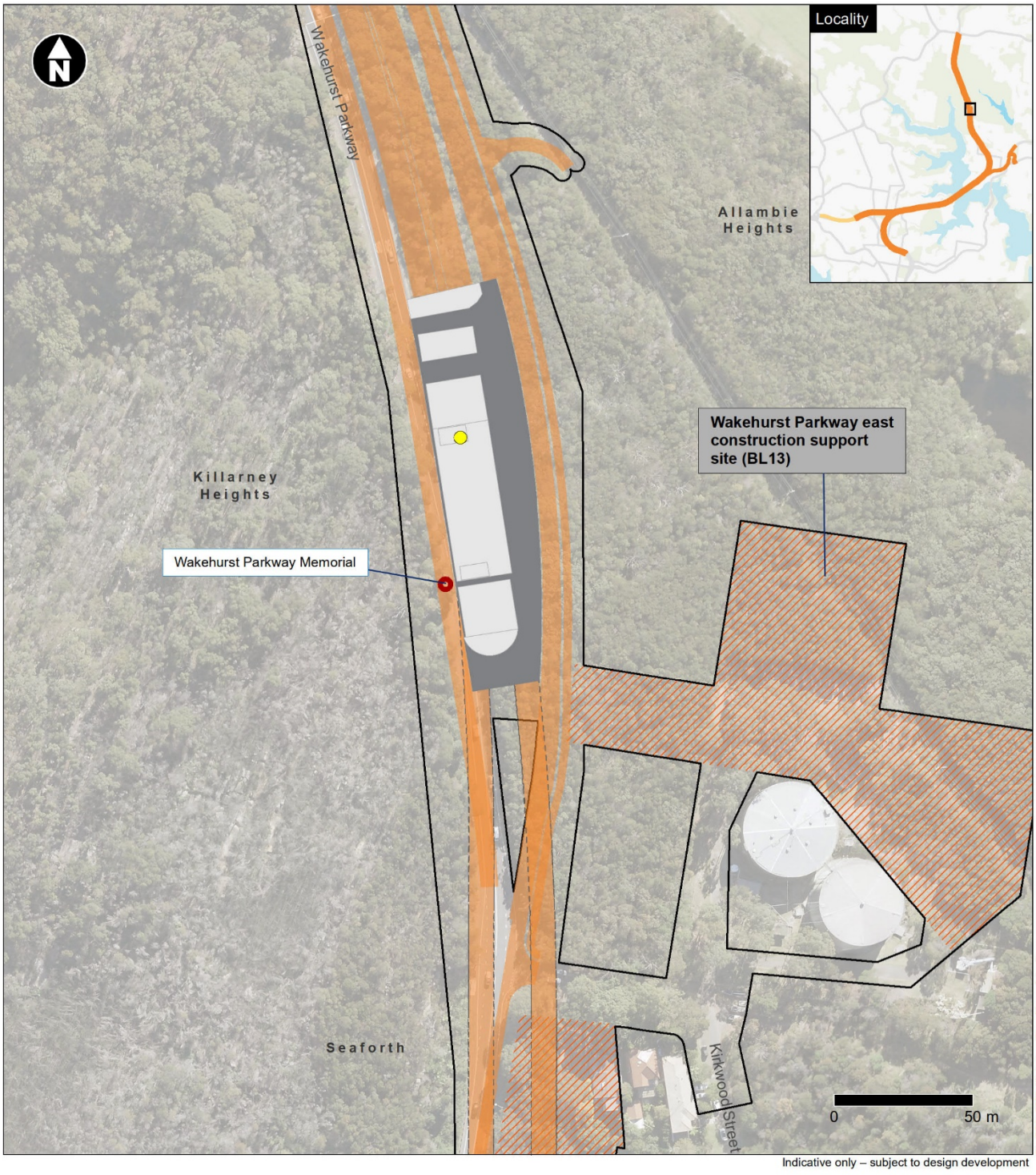

Figure 3-16 Non-Aboriginal Heritage – Location of Wakehurst Parkway Memorial

4 Item 11: Frenchs Bullock Track

4.1 Background

The submission from Northern Beach Council on the project environmental impact statement raised concerns that the non-Aboriginal heritage impact assessment was preliminary in nature due to the available level of detail around the location of the Frenchs Bullock Track, and the level of reference design detail; and a view that visual impacts were not assessed in sufficient detail.

The statement of heritage impact prepared for the environmental impact statement can be found in Section 5.4.11 of Appendix J (Technical working paper: Non-Aboriginal heritage). Overall, the proposed works and impact assessment provided in Appendix J (Technical working paper: Non-Aboriginal heritage) remains relevant to the project. This includes the recommended management measure (environmental management measure NAH9 in Table D2-1 of this submissions report) that:

> *The northern section of the Frenchs Bullock Track potentially impacted directly by construction works should be reformed if impacted, as close as possible to the existing alignment.*
>
> *Further detailed survey should be completed to confirm the heritage curtilage of the southern section of Frenchs Bullock Track prior to construction to determine if this section would be directly impacted.*
>
> *Where the heritage curtilage of Frenchs Bullock Track is within the construction footprint or boundary of proposed permanent infrastructure, impacts to the track will be avoided where possible through further design development.*

The updated impact assessment provided in Section 4.2 below assesses potential impacts in more detail than what was presented in the environmental impact statement based on the updated reference design for this area. Further, it also provides an assessment of potential visual impacts.

4.2 Updated impact assessment

The updated impact assessment considers the updated project reference design in the vicinity of Frenchs Bullock track, which has been refined following exhibition of the environmental impact statement. The design refinement in this area has arisen due to changes made to reduce impacts on Frenchs Bullock Track, as discussed in Section A.4.6 of this submissions report.

For the northern section of Frenchs Bullock Track, fill retaining walls have been introduced at the proposed combined fauna underpass and proposed shared user underpass on the western side of the roadway around chainages 11300 and 11450 accordingly (note that the chainage control point for the design has changed during further design development since the environmental impact statement). The fill retaining walls have eliminated the spread of the previous fill embankments, such that the embankments have been moved eastward to be closer to the roadway and remove the prior encroachment on to the Frenchs Bullock Track in this area.

Further detailed survey will be completed to confirm the heritage curtilage of the southern section of Frenchs Bullock Track prior to construction to determine if this section will be directly impacted. Environmental management measure NAH9 (refer Table D2-1 of this submissions report) remains unchanged and ongoing work to avoid impacts during further design development will still be carried out.

As a result of the project refinements in this area, and the concerns raised by Northern Beaches Council, an updated assessment of the Frenchs Bullock Track has been carried out. This updated assessment is based on road alignment plans and road cross-sections for the updated reference design. Further, this updated impact assessment focuses on survey data showing the location of the walking track referred to as the 'Engravings Trail', the alignment of which closely follows the alignment of the LEP listing boundary of Frenchs Bullock Track, and is potentially one and the same alignment, either physically, historically or both. Figure 4-17 shows the surveyed alignment of the Engravings Trail in comparison to the LEP listing boundary of Frenchs Bullock Track.

Table 4-5 includes commentary along the length of the Frenchs Bullock Track using the road chainage to delineate each section, including distance of the surveyed location of the Engravings Trail from the construction footprint and road design, and the change to existing road levels proposed in the design (refer to Figure 4-17). It should be noted that further detailed survey will be completed to confirm the heritage curtilage of the southern section of the Frenchs Bullock Track prior to construction to determine if this section will be directly impacted (refer to project environmental management measure NAH9 in Table D2-1 of this submissions report). An indicative visual cross-section of the design is provided in Figure 4-18.

The assessment of the updated reference design indicates that there would be reduced likelihood of direct impact on Frenchs Bullock Track from the proposed construction. Only about 200 metres of the 1,600 metres of track is within the construction footprint, and there is no planned direct impact from physical works to the Frenchs Bullock Track in these locations. However in accordance with the recommended environmental management measure for Frenchs Bullock Track, further detailed survey will be completed during further design development to confirm the curtilage of the track and impacts to the track will be avoided where possible.

Based on the updated design, the following is relevant in relation to visual impacts:

- In terms of visual impact, the view east from the French Bullock Track towards the upgraded road design remains close to existing levels, with the majority looking up to a slight embankment grade or across a lowered roadway
- The descriptions of visual elements in the design should be read in conjunction with Figure 4-18. The greatest change to the levels of the current roadway occur across the section of road between chainage 11200 – 11500, where there is a section with a proposed combined fauna underpass and drainage culvert, and a section with a batter slope. At the combined drainage/fauna underpass, there is a slope downwards to road edge/retaining wall of two metres below existing ground level across a distance of seven metres. There will be a view east from the Frenchs Bullock Track to the new retaining wall to accommodate the combined drainage/fauna underpass. The retaining wall is potentially about three metres in height from the base of the slope, but from Frenchs Bullock Track surface this wall would be visually offset by the two metres downward slope from the Frenchs Bullock Track to the base of retaining wall, essentially equating to a view of one metre of the retaining wall
- At the section of the road design with a new batter slope, the design has a slope downwards to road edge/batter slope by two metres below existing ground level across distance of six metres. There would be a view east of the new batter slope. The proposed batter slope is around two metres, but from the Frenchs Bullock Track surface this is visually offset by the downward adjustment between the Track and the batter slope
- The project would require the removal of existing vegetation, and therefore the density of vegetation between the Track and the road would be reduced. This may have some impact on the setting and aesthetic significance of the Frenchs Bullock Track, however, as much vegetation as possible would be retained during further design development in accordance with revised environmental management measure B6 (refer to Table D2-1 of this submissions

report). This would retain at least a small buffer of vegetation between the Frenchs Bullock Track and the road. There are no options through this narrow corridor for alternative solutions.

The overall impact assessment presented in Section 5.4.11.3 in Appendix J (Technical working paper: Non-Aboriginal heritage) is as follows:

> *The proposed work would be of small and localised scale and of low intensity, with a small section of the Frenchs Bullock Track potentially being permanently modified by a slope associated with roadworks extending into the curtilage of the item. Further detailed survey and design development would be completed prior to construction to confirm if impacts can be either eliminated or reduced further.*
>
> *If required, this work would be a permanent and irreversible change to around 20 per cent of the track, and this work does not impact the significant heritage components of the item, as the majority of the track remains in situ and would continue to display its historical and aesthetic significance. As such, the level of impact on the heritage item would be minor.*

Compared to the design assessed during the environmental impact statement, the updated reference design has likely reduced direct impact on the Frenchs Bullock Track heritage item. There is now only likely impact on around 12 per cent of the Frenchs Bullock Track length (as physically manifested as the Engravings Trail) which is situated within the construction footprint, instead of the previously assessed 20 per cent. This outcome is consistent with project environmental management measure NAH9 which was based on the key management measure outlined in Appendix J (Technical working paper: Non-Aboriginal heritage), in that further detailed survey and design development prior to construction has likely reduced direct impacts. Further detailed survey will be completed during further design development to confirm the curtilage of the track and impacts to the track will be avoided where possible.

The visual impact assessment for the updated reference design indicates that while there would be a reduction in the amount of vegetation currently between the Frenchs Bullock Track and the road, the design has likely reduced the level of intrusive increases in the height of the road and associated infrastructure from the design assessed in the environmental impact assessment. The retention of at least a narrow vegetation corridor could help to minimise the visual impacts, and the design of the road is such that the level of visual intrusion above the existing landscape has been minimised. Future landscaping as part of the project would also assist in minimising visual impacts over the longer term.

The management of direct impacts, potential direct impacts, and vibration impacts has not changed, and the measures presented in Table 5-17 of Appendix J (Technical working paper: Non-Aboriginal heritage) remain unchanged.

The proposed work in the vicinity of Frenchs Bullock Track would still be of small and localised scale and of low intensity. Based on the updated design, there would likely be a reduced likelihood of impact to Frenchs Bullock Track, and the Track would continue to display its historical and aesthetic significance. As such the level of impact from the updated reference design on the heritage item would be minor, consistent with the conclusions from the assessment in Section 5.4.11.3 of Appendix J (Technical working paper: Non-Aboriginal heritage).

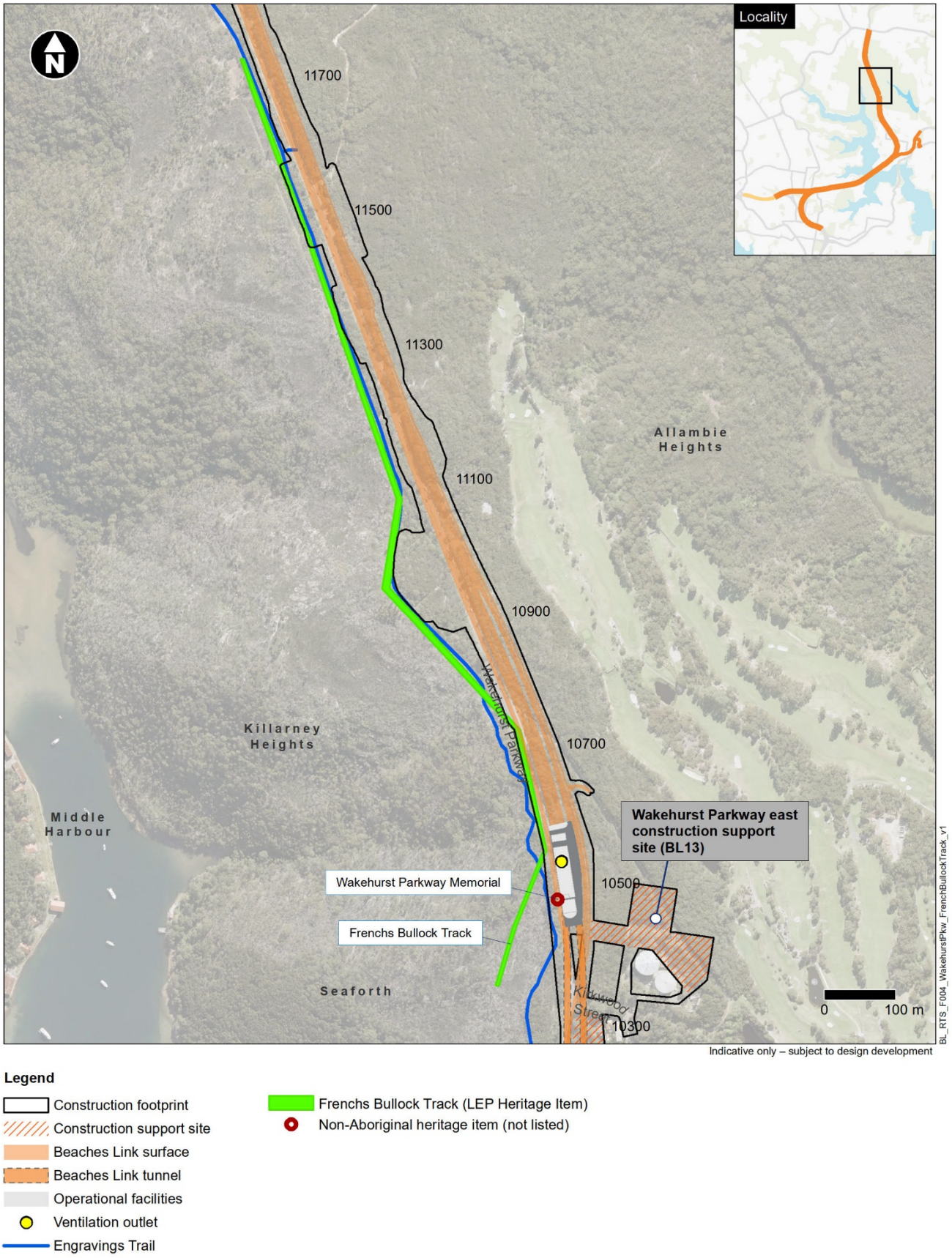

Figure 4-17 Non-Aboriginal Heritage – Location of Frenchs Bullock Track LEP listing boundary and surveyed location of Engravings Trail

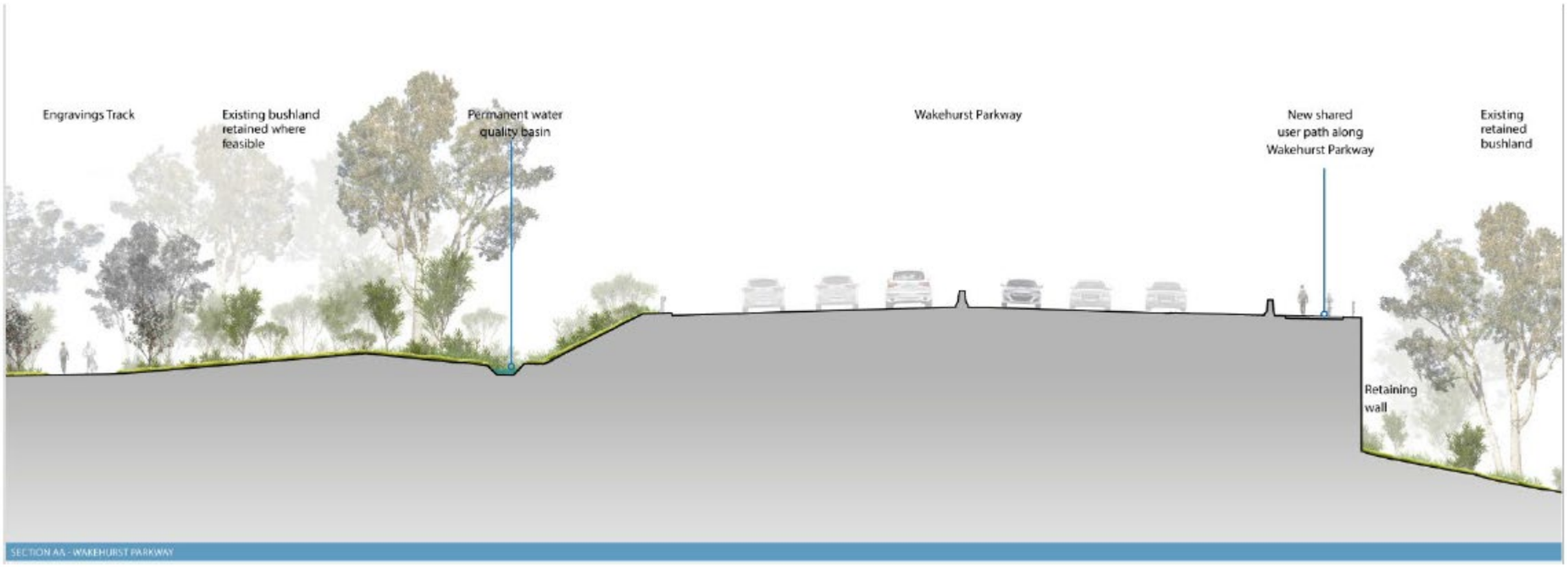

Figure 4-18 Indicative cross-sections of Wakehurst Parkway (from Appendix V (Technical working paper: Urban design, landscape character and visual impact))

Table 4-5 Updated impact assessment against construction footprint, updated road design and elevation cross-section drawings near Frenchs Bullock Track based on surveyed location of Engravings Trail (Note: subject to final survey on site and completion of detailed design)

Chainage (m)	Construction footprint assessment	Elevation assessment	Impact assessment
10300 - 10400	Track mainly outside the construction footprint, with about 36 m section within the footprint.	1 m rise above existing ground surface level, across 4 m distance.	No direct impact from proposed design. View east remains close to existing levels, looking up slight embankment grade.
10400 – 10500	Track outside construction footprint.	Minor variations from existing ground surface level with some sections 0.5 m above existing and some around 0.5 m below existing, but mostly same as existing level.	No direct impact from proposed design. View east remains consistent in terms of existing road levels.
10500 - 10600	Track outside construction footprint.	Minor variations from existing ground surface level with some sections 0.5 m above existing and some around 0.5 m below existing, but mostly same as existing level. Then road level drops to where tunnels emerge at centre of road.	No direct impact from proposed design. View east remains consistent in terms of existing road levels, road level beyond drops with emergence of road from tunnel portal.
10600 – 10700	Track is well outside construction footprint by about 20 m.	1 m rise above existing ground level to road edge. Then road level drops to where tunnels emerge at centre of road.	No direct impact from proposed design. View east remains consistent in terms of existing road levels, road level beyond drops with emergence of road from tunnel portal.
10700 – 10800	Track is well outside construction footprint by about 12 m.	Between 0.4 m and 0.9 m rise above existing ground level to road edge and western lane. Then road level drops to where tunnels emerge at centre of road.	No direct impact from proposed design. View east remains consistent in terms of existing road levels, road level beyond drops with emergence of road from tunnel portal.
10800 – 10900	Track immediately outside of construction footprint, alongside the top edge of the proposed drainage basin. Access to the drainage basin is proposed from the existing track.	2 m lowering below existing ground level to road edge, with lowered level across entire roadway.	No direct impact from proposed design. View east remains consistent in terms of existing road levels, road level beyond drops with emergence of road from tunnel portal.
10900 – 11000	Track immediately outside of construction footprint, alongside the top edge of the proposed drainage basin. Access to the drainage basin is proposed from the existing track.	Slope downwards to up to 3 m below existing ground level across a distance of 7 m. Roadway design proposed at existing road level.	No direct impact from proposed design. View east remains close to existing levels, looking down slight embankment grade across widened road form.
11000 – 11100	Track outside construction footprint, being about 8 m away at its closest point.	Slope up to road design by 1.7 m above existing road level over a 5 m distance. Roadway design proposed at less than 1 m above existing road level.	No direct impact from proposed design. View east remains close to existing levels, looking up slight embankment grade.
11100 – 11200	Track outside construction footprint, being about 8 m away at its closest point.	Slope down to road design by 2.5 m below current road level, over a 5 m distance.	No direct impact from proposed design. View east remains consistent in terms of existing road levels, looking up slight embankment grade.
11200 – 11300 11300 - 11400	About 60 m section of track just inside the construction footprint; 140 m section about 10 m outside construction footprint. Partly adjacent to proposed combined fauna underpass and drainage culvert, however this location is currently under review.	Slope down to road edge by 0.5 m - 0.6 m below existing ground level. At fauna underpass/drainage culvert, slope downwards to road edge/retaining wall of 2 m below existing ground level across distance of 7 m.	No direct impact from proposed design. View east of new retaining wall to accommodate drainage and fauna underpass. Retaining wall about 3 m height from base of slope, but from track surface, this is visually offset by 2 m downward slope from track to base of retaining wall.
11400 – 11500	Track within construction footprint, but 8 m away from proposed batter slope.	Slope downwards to road edge/batter slope by 2 m below existing ground level across distance of 6 m.	No direct impact from proposed design. View east of new batter slope. Batter slope around 2 m, but from track surface this is visually offset by the downward adjustment between the track and the batter slope.
11500 – 11600	About 10 m section of track within construction footprint, but 10 m from batter slope.	Slope downwards to road design by 0.8 m below existing ground level over a 4 m distance.	No direct impact from proposed design. View east remains consistent in terms of existing road levels, with road dropping below existing view.
11600 – 11700	Track outside construction footprint. Approximately 10 m from safety barrier/pedestrian fence.	Slope downwards to road design by 0.4 m below existing ground level across a 1.3 m distance.	No direct impact from proposed design. View east remains consistent in terms of existing road levels, with road dropping below existing view.

Chainage (m)	Construction footprint assessment	Elevation assessment	Impact assessment
11700 – 11800	Track outside construction footprint. Between 16 and 30 m from safety barrier/pedestrian fence.	Existing ground level retained.	No direct impact from proposed design. View east remains consistent in terms of existing road levels, across widened road form.
11800 – 11900	Track 50 m outside construction footprint to the end of the track, which continues outside the LEP listing boundary.	Slope up to road design about 0.6 m above existing ground level, over an 8 m distance.	No direct impact from proposed design. View east remains consistent in terms of existing road levels, across widened road form.

5 Conclusion

A significance assessment and statement of heritage impact has been prepared for the Canberra Concrete Bus Shelter located on Wakehurst Parkway. The Canberra Concrete Bus Shelter is a good example of the brutalist architectural style, at a relatively small scale. The Canberra Concrete Bus Shelter is not listed on any heritage register or database and for the purposes of this assessment has been assessed as being of local significance and has been found to meet significance assessment criterion C (aesthetic significance/technical/creative achievement) at the local level. The Canberra Concrete Bus Shelter does not meet any other criterion at either the state or local level. The works in the vicinity of the Canberra Concrete Bus Shelter would require the removal of the Canberra Concrete Bus Shelter. The Bus Shelter could be relocated elsewhere, and continue use as a bus shelter or repurposed to an appropriate alternate use within the Northern Beaches local government area while still retaining its heritage values.

A significance assessment and statement of heritage impact has been prepared for the Wakehurst Parkway Memorial. The Wakehurst Parkway Memorial commemorates the NSW governorship of Lord Wakehurst and is the first road to have the term ‘parkway’ as part of its name. The Wakehurst Parkway Memorial could be considered rare. The works in the vicinity of the Wakehurst Parkway Memorial would require the removal of the Wakehurst Parkway Memorial. The Wakehurst Parkway Memorial is not listed on any heritage register or database and has been assessed as being of local heritage significance for its association with the Wakehurst Parkway more broadly, rather than for its particular current location. It could be relocated elsewhere within the Northern Beaches local government area, in close proximity to Wakehurst Parkway, while still retaining its heritage values.

A series of measures are proposed for the management and potential relocation of both the Canberra Concrete Bus Shelter and the Wakehurst Parkway Memorial prior to the commencement of construction of the project.

An updated impact assessment of the Frenchs Bullock Track has been carried out based on the updated reference design. The proposed work in the vicinity of Frenchs Bullock Track would be of small and localised scale and of low intensity. There would be reduced impacts to the Track and the Track would continue to display its historical and aesthetic significance. As such, the level of impact on the heritage item would be minor, consistent with the conclusions from the assessment detailed in Section 5.4.11.3 of Appendix J (Technical working paper: Non-Aboriginal heritage). Further detailed survey will be completed to confirm the heritage curtilage of the southern section of Frenchs Bullock Track prior to construction to determine if this section would be directly impacted. Environmental management measure NAH9 (refer Table D2-1 of this submissions report) remains unchanged and ongoing work to avoid impacts during further design development, will still be required.

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