

**Hawkesbury District Branch**

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Mr Andrew Beattie,  
Senior Planner  
Infrastructure Projects  
NSW Department of Planning  
GPO Box 39  
SYDNEY NSW 2001

Dear Mr Beattie

**Re: Windsor Bridge over the Hawkesbury River now retitled  
Windsor Bridge replacement project**

In June 2012 the Hawkesbury Branch of the National Trust of Australia (NSW) based on all the information made available from the RMS at the time resolved:-

***In recognition of the undisputed significance of Thompson Square as Australia's oldest and only 18th century Civic Square, the National Trust of Australia (NSW) Hawkesbury Branch opposes a high level wide bridge (option 1) or derivative thereof through the heart of this important place.***

***Further, that the National Trust of Australia (NSW) Hawkesbury Branch opposes the demolition of the State significant Windsor Bridge and encourages its conservation for light vehicle/ pedestrian traffic only and that a new bridge and road infrastructure be constructed as a bypass to Windsor township to satisfy long term traffic movement and improve flood free access across the river***

**HERITAGE ASSESSMENT**

Having read the November 2012 Environmental Impact Statement (EIS) we wish to advise you and the government that nothing in the EIS provides evidence for us to change our resolutions. In fact the EIS provided considerable arguments to expand and strengthen these resolutions.

The EIS Heritage Assessment confirms elements within the project area to be unique:-

***Thompson Square is the single place that links the earliest settlement on the Hawkesbury with the Macquarie-era town. The site was used as a civic precinct..... It evolved into a small village..... It was this village that was***

*incorporated into the Macquarie planned town of Windsor: it was the only town to incorporate this layer of early settlement. **It is unique**<sup>1</sup>.*

In fact the assessment confirms that :-

*The archaeological resource is likely to provide a depth of historical layering and a sense of place to the acknowledged visual qualities of Thompson Square. ....The cumulative profile record of evidence of works and change over two centuries **is unique**. .....evidence contained within it, above and below ground ..... **would potentially be of National Significance.**<sup>2</sup>*

Similarly the uniqueness of the Windsor Bridge is also confirmed:-

*The Windsor bridge is considered to be a rare item, within the state, relating to its initial construction, its subsequent modifications and survival. Its composition of iron cylinders is extremely rare in a bridge built only for road traffic. In combination with the timber beam spans, **it is unique**<sup>3</sup>.*

The Heritage assessment report recommends:-

***As the significance of the archaeological resource within the project area, and in particular within Thompson Square and down to the river would be diminished by the project, the preferred outcome is that this resource remains intact.**<sup>4</sup>*

The acknowledgement of the adverse impacts are re-iterated in the executive summary under the heading What are the main adverse outcomes expected?

**The project would result in a number of adverse impacts particularly on heritage and visual impacts. The main adverse outcomes identified include:**

- **Impacts to the heritage values of Thompson Square, as well as potential impacts to archaeology within Thompson Square and foreshore areas.**
- **Impacts to Aboriginal Archaeology**
- **Visual impacts and impacts to the landscape character of the area**
- **Additional traffic noise and changes to access to arrangements for some residents**
- **Construction related impacts such as noise, vibration, traffic and air and water quality issues.**<sup>5</sup>

It is clear from the abovementioned statements plus many others through the EIS that the current proposal fails to adequately meet the Objective:

**To minimise the impact on the heritage and character of the local area.**

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<sup>1</sup> Vol 2 Windsor Bridge replacement project p 229

<sup>2</sup> Ibid, p 230

<sup>3</sup> Ibid, p 159

<sup>4</sup> Ibid, p 347

<sup>5</sup> Vol 1 Windsor Bridge replacement project, p xiv

In addition the EIS fails to meet the Director general's requirement

**Outline the proposed mitigation and management measures (including measures to avoid significant impacts and an evaluation of the effectiveness of mitigation measures ) generally consistent with the guidelines in the NSW heritage manual.**

The NSW Heritage Manual \_ Altering heritage assets states:

**The Heritage Council will not consider applications for extensive alterations to an item of major heritage Significance unless it has already approved a Conservation Management Plan. Alterations or new works that have a major negative impact on the heritage significance of such items are usually not approved.**

No CMP has been prepared for either Thompson Square or the Windsor bridge and the EIS acknowledges that the proposal will have considerable impact on the heritage values of both items of state significance.

One of the major deficiencies is the absolute failure of the EIS in relation to the outline any mitigation measures for the ongoing usability of Thompson Square as a civic space. The EIS fails to address the landscape design issues associated with the significant changes in the slope by simply stating:

***Landscape design within Thompson Square is shown indicatively and is subject to further consultation.***<sup>6</sup>

## CONSULTATION

The EIS document also fails to acknowledged that the Director General's requirements regarding appropriate consultation with the public has not been met during the process.

Both Thompson Square and the Windsor bridge have been recorded as items of State Significance for a considerable time. However at no time during in the community consultation process was any attempt made to notify the general public of NSW through advertising the project in the state based newspapers or a wider distribution to community groups with an interest in protecting their heritage.<sup>7</sup>

It should come as no surprise that a small community action group was able in around 11 months to attract 12,000 signatures to a petition opposing the project, obtain media coverage on the ABC and commercial channels as well as coverage in the Sydney Morning Herald and local community papers in opposition to the project.

During the planning stages, by the Hawkesbury Branch of the National Trust, for a tour of some of the properties which comprise the Thompson Square conservation precinct it was publically stated that contrary to statements implied within the EIS that several of the

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<sup>6</sup> Vol 3 Windsor bridge replacement project, p88

<sup>7</sup> Vol 1 Windsor bridge replacement project, pp125 & 126

owners had not been contacted by the RMS regarding the project until after the decision re option 1 had been made.<sup>8</sup>

The EIS states that Community updates have been distributed both in 2009 and 2011 to 12,000 local residents in Berkshire Park, Windsor Downs, South Windsor, Windsor, McGraths Hill and Pitt Town, Wilberforce and Freeman's Reach. Of the above townships only Wilberforce and Freeman's Reach are located north of the Bridge and could be regarded as contributing to the traffic congestion identified in the EIS. The community consultation process failed to notify the following residents in the Glossodia, Kurmond, Blaxland Ridge, Kurrajong, Kurrajong Heights, Kurrajong Hills, Colo Heights etc. These areas on the northern side of the Hawkesbury river have recorded increases in their populations as high as 64% in contrast to the areas notified where the population is relative static.<sup>9</sup> It is the significant population increase in these northern areas within the Hawkesbury that one would assume are the major contributor to the increase in local traffic and would be the most appropriate to seek input from. The EIS fails to acknowledge or address why these areas were excluded from Community notification or consultation.

The EIS also confirms that it was not until 24 August 2011 that notification of the project was advertised in the local press. The Courier, a free newspaper, delivered throughout the townships has a coverage of 30% of the population of the Hawkesbury City. Residents from the more rural areas of the city, ie the major growth areas to the northern sector of Hawkesbury City the majority of whom were not notified by the community updates consultation process have to purchase the Hawkesbury Gazette for local information.

Unanswered questions are:-

Why was the project not advertised in the larger Daily newspapers?

Why was the project not advertised widely when it was first purported to be seeking public input?

Why was the project not advertised in the local papers prior to the project decision being made?

Why were not all owners of properties within Thompson Square contacted at the commencement of the notification process?

Why were the local residents who are the major users of the bridge not included in any notification process?

Why communities outside the Hawkesbury LGA ie Berkshire Park and those on the southern side were target for community notification whilst the regular users of the bridge coming from the northern side were excluded? and finally

How can the EIS support the credibility of the consultation process choice of options when the majority of potentially affected bridge users were not notified about the project?<sup>10</sup>

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<sup>8</sup> Verbal advice Rod Story, Megan Wood, Gary Medina and Dr Michael Walsh

<sup>9</sup> Hawkesbury Social atlas 2009, p9

<sup>10</sup> Vol 1 Windsor bridge replacement project, p 31

Similarly the Hawkesbury Branch, a local advocacy group for the heritage of the area, was not formally approached by the RMS regarding the proposal until a letter dated 12 October 2011.

### **DEVELOPMENT AND ALTERNATIVES**

It is also contended that the Director General's requirement project Development and Alternatives had not been met.

The EIS acknowledges that the community proposed several of the options outside those initially developed by the RMS. These options were a local response to both the lack of credibility to some of the initial options put forward for community consideration and based on local knowledge and in consultation with experts both local and from outside the region. In conflict with the Director General's requirements these options were not rigorously assessed.

Although the EIS does acknowledge that A Hawkesbury Valley Way option developed by retired RTA engineers in consultation with Chris Hallam Traffic Engineer would meet the objectives for heritage, safety and partially meet traffic requirements, this option has not been fully evaluated as required by the Director General. The EIS does acknowledge that a more innovative approach to the repair of the State listed Windsor bridge was achievable at a considerable less costing's cost than that reported to the public during the consultation process and used by the RMS to dismiss the conservation of the state listed item. The public was advised the repair costs of \$18 million by the RMS whilst with the innovative solution has been professionally costed at around \$4 million. This alone should be grounds for a re-evaluation of all of the purported costing's and proposed methodologies for the options provided to the public and government during the selection of the preferred route option decision making process.

The EIS also contains unresolved anomalies regarding the safety of the existing historic bridge. The following questions need to be answered:-

Why was Hawkesbury City Council offered to take over the responsibility of the Bridge<sup>11</sup> if it is as unsafe as the EIS claims?

Why was the speed restriction only placed on the bridge since the inception of the project? The bridge width has not changed for over 100 years. The width of cars and trucks similarly have not changed.

Where are the reports to support the claim that the bridge would fail during a flood? <sup>12</sup> Surprisingly the bridge did not fail during the recent flooding although the EIS repeatedly claims that this is a threat.

If the bridge is unsafe as the EIS appears to claim, the public are entitled to ask:-

Why is there no load limits on the bridge?

Why has nothing been done to make it safe as a matter of urgency? and

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<sup>11</sup> Ibid p, 34

<sup>12</sup> Ibid, p34

Why has the bridge, an item of State significance, been allowed to deteriorate the extent where it is reported as being unsafe?.

During community consultation the heritage focus group was repeatedly advised that the bridge was structurally sound to take the loads.

The anomalies and inconsistency in the EIS need to be more fully explored before the EIS can demonstrate that it meets the Director General's requirements.

### **FLOODING**

The community consultation was undertaken with a commitment to improve flood immunity to a 1 in 5 year flood event. This commitment was re-iterated in the August 2011 community update.<sup>13</sup>

The EIS reveals that this criteria is also not being met. The peak flood levels are 11.1 for a 5 year flood. The EIS now reveals that the project would have a minimum RL of 9.8 some 2.3 metres lower than that suggested in the community updates of 2009 and 2011.

Of even more concern is the absolute omission from the November 2012 Community update of any reporting of the objectives the criterion and the project option demonstrating the meeting of these objectives. Again one must ask WHY?

### **CONCLUSION AND RECOMMENDATIONS**

The members of the Hawkesbury Branch of the National Trust respectfully request that the Director General reject the EIS and request the RMS be required to

- Develop a solution that can fully demonstrate that meets the director generals requirements and

- Develop a solution that honours the commitments made to the community during the consultation process.

and further that the RMS

- Evaluate alternative options which incorporate the retention and conservation of the Windsor bridge and

- Consider only options that protect the unique heritage of both Thompson Square and the Windsor bridge to ensure that they are not irrevocably damaged as acknowledged in the EIS.

Yours faithfully



Carol Edds  
Chair, Hawkesbury Branch National Trust

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<sup>13</sup> Community update, July 2009 & August 2011