



ENVIRONMENTAL SERVICES

28 October 2009

Mr Martin Gormley
RTA Project Manager
Roads and Traffic Authority
PO Box 973
PARRAMATTA NSW 2124

Dear Mr Gormley,

RE: LONG GULLY BRIDGE (the Northbridge Suspension Bridge) NEW SAFETY BARRIER STATEMENT OF HERITAGE IMPACT

Thank you for forwarding a copy the September 2009 Long Gully Bridge New Safety Barrier Statement of Heritage Impact and supporting information for our comments.

Council reiterates its previous submission (copy attached) on the proposed safety barrier dated 14 October 2009. The following additional points are made regarding the September 2009 Statement of Heritage Impact.

The Statement of Heritage Impact is a thorough assessment based on available information. However, there are outstanding and unresolved issues in relation to the proposed safety barrier, which must be addressed and assessed for heritage impact, prior to any decision on this matter.

1. Introduction & Background

1.1 Design Development

This section includes:

“Part of the design development now lies in resolving:

- *Whether the pickets should be ‘straight’ or ‘gently curved’;*
- *The diameter of the picket bars to suit both design requirements and safety (and what structural design loads should be used to determine such safety);*
and
- *Resolution of the barrier at the architectural features of the Bridge (sandstone towers, light posts, curved balcony and castellated turrets). This resolution will be slightly different depending on whether a ‘straight’ or ‘curved’ picket fence option is decided on.”*

Contact: Lynette Morris (Tuesday to Friday)
Phone: 9777 7502

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In accordance with the NSW Heritage Branch Statements of Heritage Impact, “a statement of heritage impact is meant to convey what the impact or impacts of a proposal would be.” The submitted Statement mentions that it only “deals with the impact of the resolved design issues for the new barrier” and there are still “unresolved issues” which have not adequately been addressed as indicated in the above 3 dot points.

Council also notes with concern that the Statement of Heritage Impact was prepared without input to the development of the proposed designs and has not addressed alternative schemes that may have a lesser impact.

1.6 Community Consultation

The Statement provides “a summary of the preliminary community consultation, together with the RTA response.” However, the extent of this community consultation does not comply with the RTA’s Environmental Impact Assessment Guidelines (Version 4) and its Community: Involvement and Communications Draft: a resource manual for staff, which contain the following requirements:

RTA Environmental Impact Assessment Guidelines, Version 4

“4.2.4 Community involvement in the concept stage

A substantial element of project focused community involvement programs should be directed to the concept stage, in accordance with procedures and techniques in the RTA’s Community Involvement Practice Notes and Resource Manual.

This part of the community involvement program might include, for example:

- *Community representation on project teams*

The aims of community involvement at the concept stage are:

Identification of all issues and constraints to project development / option selection

Development of options and selection of preferred option on the basis of all relevant information

Development of the proposed activity in an open partnership with the community”

Community: Involvement and Communications Draft: A resource manual for Staff June 2008

Responsibility (p.3)

“Staff are responsible for ensuring that community and stakeholder involvement processes are conducted with openness and integrity, and that opportunities for participation are provided to all communities and stakeholders who are interested in or may be impacted by the activities and decision-making of the RTA.”

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2. What should the outcomes of community involvement be? (p.7)

“Effective participation

This means shared input throughout the study process, allowing people to contribute in an informed way and influence decisions. Note this goes beyond just providing information. Opportunities for effective participation should be realistic and provide people with adequate information and time to participate.

Flexibility

The community involvement process should respond to changing circumstances and needs, that is, the cultural, educational, financial and mobility needs of affected communities. The terms of reference, study, methodology and agenda must be open to change. Flexibility means trying new and creative ways of involving the community.”

3. How to prepare a community involvement plan (p.9)

3.1 The plan at a glance

(i) Setting community involvement objectives

- *“Understand stakeholder and community issues, values and concerns (stated and not stated) that relate to the project.”*
- *“Incorporate stakeholder and community issues into each phase of the investigation, from the development of preliminary route options to the refinement of a preferred route.”*

Clearly, the RTA's community consultation has not met its own guidelines, but rather occurred after the RTA had determined its preferred option for the safety barrier.

Further to the above Guidelines and Resource Manual, the Department's obligation under the RTA Heritage Guidelines (Version 2, 2004) includes:

3.6 Community Consultation

- *“The people of NSW have a central role in planning for the future management of their heritage.*
- *Community participation is provided for in the planing process by the Environmental Planning and Assessment Act, 1979.*
- *Community participation in environmental impact assessment and heritage management is a central aspect of all current practice guidelines.....*
- *Specific projects will require specific community participation strategies*
 - *Consultation must be conducted at the pace of the community, not the researcher*
 - *Consultants must have a commitment to accepting the consequences of consultation even if the community rejects the major thrust of the proposal.”*

There was no broad community involvement during the concept stage of the safety barrier, and the proposed fencing options have not had wide community consultation to the extent as

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required in the RTA Heritage Guidelines. This is a shortcoming that Council has highlighted in its earlier submission and representations to the Authority.

4. Proposed Works

3.5 Barrier Panels

The Statement of Heritage Impact does assess both the straight and inward curved options, with the RTA preferred option favouring the curved steel picket. However, the *“design team is still considering whether the steel picket fence panel should be straight or curved.”*

Barrier panels: The installation of a straight or curved barrier option is unresolved

3.6 Size of the Steel Rods

The Statement claims that *“There are no codes or standards for the erection and compliance of additional anti-suicide barriers to existing bridges which already have balustrades..... Therefore a performance based solution for this particular barrier is being developed.”*

Size of the steel rods: Unresolved, as the *“solution for this particular barrier is being developed.”*

3.7 Barrier at Turrets & Balconies

The Statement maintains that *“The resolution of the design of the barrier at the turrets and curved balconies will partly depend on whether a straight or curved fence panel is decided on.”*

Barrier at turrets & balconies: Unresolved, as there has been no definite decision the installation of a straight or curved fence panel.

In September 2009 Willoughby Council obtained its own independent heritage advice from consultants Godden Mackay Logan (GML). A copy of their advice is attached. The advice provides the following opinion on option 1:

“In our opinion, there must be real concern that the impact of the selected option on the experience of crossing the bridge will be one of negative enclosure – a constant and pervasive reminder of why it has been installed. The already narrow pedestrian footpaths will feel uncomfortably restricted. Particularly adverse will be the impacts of filtering/separation from the expansive views and pleasure of the castellated whimsy of the bridge design. What is described by the GAO as a solution with ‘reasonable transparency and comparatively lower impact’ may well feel to others to be a stark prison-bar-like enclosure, and unacceptably diminishing the heritage values of the place. This suggests that other solutions must still be sought.”

GML also made the following statement:

“In our opinion the opportunity to change an unfortunate item of necessary urban infrastructure into a positive experience warrants further examination.”

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Conclusion

The proposed fencing options have not had wide community consultation and support during their design development but at the conclusion of the consideration of design options, which is not in keeping with the RTA and Heritage Branch best practice. The RTA's 'Option Analysis' and 'Statement of Heritage Impact' acknowledges that there is a need for *'further design development'*. There are still important heritage, pedestrian amenity and design issues that have not been satisfactorily resolved in either document.

The 'Feedback Summary' of the meeting held at North Sydney Council on 23 July 2009 acknowledged that there was community and stakeholder support for a competition to investigate alternative design solutions. However, the RTA response to this proposition is: *"Given the amount of research into design options conducted by the NSW Government's Architect's Office and the urgent need to complete installation, the RTA will not be holding a design competition"*.

Council endorses the Statement of Heritage Impact assessment (p.35) ***"that it would be preferable to have no barrier on the historic Northbridge Bridge and that any barrier added to the Bridge will have some negative impact."***

Both the Willoughby and North Sydney communities recognise that a solution has to be found addressing the issues associated with mental health in the community which manifest in the Bridge's history of suicide incidents. However, there are concerns about the *"unresolved issues"* relating to the proposed barrier that are not addressed in the September 2009 Statement of Heritage Impact and the RTA's resistance to considering community and stakeholder alternative designs that harmonise with the Bridge's significant heritage and architecture values as required by the Coroner.

Council requests that the design approval process be discontinued until there has been proper community consultation as required by the RTA Guidelines. Council would also reiterate its concern that the RTA has not followed the correct legal procedure under Part 5 of the Environmental Planning and Assessment Act 1979 to obtain the necessary approval for the work to proceed.

Thank you for providing Willoughby City Council with the opportunity to comment on the September 2009 Long Gully Bridge, New Safety Barrier, Statement of Heritage Impact. If you require clarification on any point raised in the above comments please contact Lynette Morris Heritage Planner on 9777 7502 (Tuesday to Friday).

Yours faithfully



Greg Woodhams
DIRECTOR ENVIRONMENTAL SERVICES