

Submission Cover Sheet

North East Link Project EES IAC

774

Request to be heard?: yes

Full Name: Stuart Hughes

Organisation: Parks Victoria

Affected property: Many parcels of Crown Land along the Yarra River

Attachment 1: North_East_Link_

Attachment 2:

Attachment 3:

Comments: Parks Victoria's submission an attached document.

7 June 2019

Planning Panels Victoria
Submitted electronically via: Engage Victoria

Dear Planning Panels Victoria,

PARKS VICTORIA SUBMISSION – NORTH EAST LINK ENVIRONMENTAL EFFECTS STATEMENT

Please accept this submission to the North East Link Project, Environmental Effects Statement (EES) Inquiry.

Parks Victoria is the Public Land Manager for a large proportion of the Yarra Valley Parklands and Yarra Bend Park which will be directly and indirectly impacted by the proposed road and suite of ancillary projects identified. Given the project footprint in relation to these reserves, Parks Victoria has been included in the Technical Reference Group (TRG) for the North East Link Project and has been in regular communication with the Proponent on a range of matters specifically pertaining to potential impacts to the Parks Victoria estate.

To provide context prior to commenting on specific elements of the project, below is an outline of the key areas which Parks Victoria manages within proximity to the project footprint.

Parks Victoria Estate context in relation to NEL project

Yarra Valley Parklands

The Yarra Valley Parklands (YVP) comprise a series of regionally significant parks and reserves that extend along the Yarra River for approximately 16 kilometres from Ivanhoe to Warrandyte. The Yarra Valley Parklands are one of the most significant expanses of public open space in metropolitan Melbourne, incorporating over 1,500 hectares. They are characterised by a diverse array of landscapes including bushland, open paddocks and floodplains, linked by the iconic Yarra River. The diverse landscapes provide for a wide range of recreational pursuits and contain significant natural and cultural values. The parklands are vital in contributing to the health and well-being of the community and the character of the local and regional landscape.

The Main Yarra Trail traverses the YVP for 18 kilometres from Burke Road in Ivanhoe to the confluence of the Mullum Mullum Creek with the Yarra River in Templestowe. The Main Yarra Trail is an important component of the Metropolitan Trail Network and primarily serves as a recreational shared use trail connecting areas within the broader parklands whilst also facilitating access to surrounding communities.

Below, table 1 identifies the specific Parks and Crown land parcels managed by Parks Victoria, which are directly and indirectly impacted by the proposal. These areas are described and key project elements relating to these areas are noted.

Table 1. Parks and Crown land parcels within YVP managed by Parks Victoria in proximity to the NEL project.

Park/ Crown Land parcel	Relevant strategic plans & current projects	Relevant NEL elements
Banksia Park	Yarra Valley Parklands Management Plan (2008)	Temporary occupation for TBM extraction site Manningham Road interchange Park access - interim and long term Bridge & trail connections
Yarra Flats	Yarra Valley Parklands Management Plan (2008) Current Section 96A combined planning permit and planning scheme amendment application for a tree based Eco adventure.	Potential stormwater infrastructure Trail connections
6-8 Manningham Road	Yarra Valley Parklands Management Plan (2008)	Temporary occupation for construction Potential land acquisition for NEL project Potential “cultural landscape trail” connections
27-33 Templestowe Road	Yarra Valley Parklands Management Plan (2008)	Identified as potential relocation opportunity for sport and recreation uses displaced by NEL project.
Bolin Bolin billabong	Yarra Valley Parklands Management Plan (2008) Yarra River Action Plan 2017 recognises restoring natural water inflow regimes and rehabilitation of the surrounding environment of Bolin Bolin billabong as a priority action (no. 22).	This is a documented as a ‘no-go’ area. Opportunities for enhancement of environmental and cultural water flows

The Yarra Valley Parklands Management Plan (2008) provides a strategic framework for the management of the Yarra Valley Parklands. Within the plan, the parklands have been divided into seven management zones. These management zones seek to reinforce the identity of particular areas, and provide a framework to direct decision making and to determine how Parks Victoria and other public agencies will manage the land as well

as providing direction for the future management of private land under consideration for possible incorporation into the parklands. While the plan recognises park-wide and management zone actions on issues current when adopted in 2008, it also recognises the ongoing management of the parklands will occur within a changing social, political and economic context. The plan is therefore to be used as a decision-making framework, in consideration of proposals impacting the parklands. Accordingly, it is necessary for the North East Link Project to have regard for the plan.

Parks Victoria is participating in the current development of the Yarra River Bulleen Precinct Land Use Framework Plan (YRBP LUFPP). This is part of a broader commitment within the Yarra River Action Plan (2017) to deliver a Cultural River Precinct Structure Plan (action 21). The precinct is recognised as having the potential to become an internationally significant cultural precinct centred on the relationship between the arts, nature and Aboriginal heritage. The plan aims to ensure the long-term protection of the Yarra River and its parklands and manage development along the Yarra corridor. Once completed, this plan will provide strategic direction for future land use changes for the precinct. This including strategic land use direction for parts of the Yarra Valley Parklands described above.

Yarra Bend Park

Yarra Bend Park is the largest area of natural bushland near the heart of Melbourne. The park features steep river escarpments, open woodlands, playing fields and golf courses. Parks Victoria is Public land Manager for nearly 250 Ha of land on both sides of the Yarra River from the Chandler Hwy, Kew to the Wallmer St bridge in Abbotsford.

The areas within Yarra Bend Park which are directly and indirectly impacted by the proposal are noted in table 2.

Table 2. Elements within Yarra Bend Park managed by Parks Victoria in proximity to the NEL project.

Park/ Crown Land parcel	Relevant strategic plans & current projects	Relevant NEL elements
Fairlea Reserve	<p>Redevelopment works are underway for the sporting precinct generally incorporating the following;</p> <p>Eight new netball courts in the current vacant land between the Parks Victoria office and Yarra Bend Road</p> <p>Replace the current pavilion with a toilet and a new shared pavilion</p> <p>Retain the fly fishers pond without change, in the current location</p> <p>Removes the existing entry road to the office and provide additional car parking retaining most of the tree canopy around the courts</p> <p>Lighting improvements</p> <p>Retain existing uses and the pedestrian trail through the precinct to the Main Yarra Trail, and dog walking activity</p>	<p>Eastern bicycle commuter corridor</p> <p>Trail connections</p>

Please refer to the following *visitor guides for* Banksia Park, Birrarung Park, Yarra Flats, and Yarra Bend Park (*attached*) which include detailed park maps identifying existing key assets and trails located within these reserves. These are accessible via www.parkweb.vic.gov.au

Detailed comments regarding project elements

Parks Victoria is generally supportive of the performance based Environmental Performance Requirements (EPRs) and Urban Design Strategy (UDS) which seek to address the risks outlined in the scoping requirements set by the Minister for Planning and the Commonwealth.

The following section of this submission contains comments in relation to key themes and specific components of the project, of interest to Parks Victoria. Observations regarding how the EES addresses areas of interest, and suggested alterations to address identified issues, are outlined. For convenience, Appendix 1. contains a summary of suggested EPR and UDS changes Parks Victoria would like to see with rationale provided where changes are sought as discussed below.

Maintaining and enhancing park access

Parks Victoria encourages and supports enhancing safe and efficient connectivity to and throughout parks via appropriate trail networks and vehicular access connections generally as proposed.

Access to Banksia Park and Heide MoMA precinct

There are challenges associated with the existing vehicular access to Banksia Park and the adjacent Heide MoMA precinct from Templestowe Road. Given the scope of change occurring within the Manningham Road interchange precinct, the project serves as a catalyst to review access arrangements to enhance safe and efficient access to both assets. This is in part recognised in the UDS at Point 2M pertaining to the Map Y1 Manningham Interchange. This point recognises the need to “*Consider future options for vehicle and pedestrian access to the Heide MoMA*”. Parks Victoria consider it would be pertinent to add the words “and Banksia Park” to ensure the park and broader open space network forms a consideration.

The NEL project endeavours to have regard for the parkland context through which it traverses, and improving community links to open space should be reflected in the EPR’s in addition to the UDS. Parks Victoria consider that the Transport and Traffic EPR T1 *Optimise design performance* should be expanded to enhance access to parks and reserves in addition to the other critical points mandated. Parks Victoria suggest the inclusion of wording such as “*enhance safe and efficient vehicular and pedestrian access to public parks and reserves. Where alterations to access are proposed, the relevant Public Land Manager must be consulted*”.

Trail connections throughout the park network

Banksia Park

Given the extent of change proposed within the Manningham Road interchange precinct, existing trail arrangements will be impacted from the anticipated interim use of Banksia Park for TBM extraction and proposed Yarra Street - Banksia Park bridge connection. This project subsequently serves as an opportunity to strategically reconsider existing access and trail arrangements within the park to enhance community access to open space whilst providing a better connection between communities particularly to the east and west of the precinct. Accordingly, strategic opportunities to enhance active transport routes outside of the project scope must also stem from new routes planned in conjunction with this project.

The UDS identifies potential trails stemming from the proposed bridge terminating at Heide MoMA and a footpath along the northern side of Bridge Street to provide Bulleen Road residents access to the Heidelberg

Activity Centre. The UDS does not identify or explore connectivity between the proposed bridge and Banksia Park itself and the communities to the east. Parks Victoria consider additional consideration of connections within and external to Banksia Park should be identified to assist in improving pedestrian links through to the east of Templestowe Road. The significant disturbance of the park due to the temporary occupation of a portion of the park for the TBM site serves as an opportunity to review and enhance Banksia Park in terms of visitor amenity and connection to the broader precinct. Map book sheet 18 pg 42 recognises ground improvements for a significant portion of the park. This must be reflected within the UDS.

Fairlea Reserve, Yarra Bend Park

Parks Victoria support the separation of eastern bicycle corridor from the River Circuit Trail at Fairlea Reserve as identified in the UDS Map Y6. *Yarra Boulevard to Hoddle Street (noted at Point 2B)* and as identified within the map book. This will assist in preventing user conflict, noting that Fairlea Reserve is soon to be redeveloped and will become subject to higher levels of visitation than present.

The intersection and termination of the cycleway with the existing Main Yarra Trail adjacent to Roseneath Street footbridge providing access across Merri Creek is of concern. Parks Victoria emphasises the prime purpose of the Main Yarra Trail is to facilitate a recreational shared use trail which connects areas within the parkland network. Given the merging of high speed transport cyclists with regular park users, cyclist and park user safety at this point will be at risk. It is highlighted that this is already a very popular area for off leash dog walking, families and recreational bike riding. The addition of a new stream of commuter cyclists will contribute additional pressure. Accordingly, the design of the connection will be critical in the safe integration and management of the two paths, and ultimately the safe use of the bridge also. Parks Victoria considers that an integrated active transport link needs to be identified and included as part of the project to ensure safe connectivity between the cycleway and active transport routes to the west through Clifton Hill.

General

Where additional trail connections or modifications are suggested (as outlined within the UDS), Parks Victoria emphasise that the environmental and cultural appropriateness of new trails must form key considerations. It is also critical that trails are in keeping with the experience(s) associated with the environments in which they traverse. User safety must also form a primary consideration, with trails designed and located to reduce user conflict. This is addressed in the UDS Section 7 *Detailed Requirements and Benchmarks*, Subsection 13 *walking and cycling infrastructure* where safety (including path separation and trail intersections) are addressed.

Protection and enhancement of cultural and environmental values throughout design, construction and operation of the new road and ancillary features

Parks Victoria supports EPR's and the UDS directions pertaining to the preservation and protection of cultural and historical heritage. The suite of environmental management documents required to be prepared and implemented to address environmental impacts throughout design, construction and operation, are deemed comprehensive. It is noted that EPR LP1 *Minimise land use impacts* requires the project to minimise impacts on parks and reserves (among other land uses) are far as practicable. This is supported.

Where the project does impact parklands, Parks Victoria supports the retention and protection of native vegetation where possible, and the appropriate replanting with species which are consistent with the values of the reserves context and function. This is reflected in the Arboriculture and Flora and Fauna EPR's. It is noted that EPR FF2 *Minimise and offset native vegetation removal* requires use of local seed where practicable, this is supported.

The UDS also contains detailed requirements and benchmarks associated with *public open space* and *landscape*, where weed management, landscape establishment, landscape planting maintenance and plant health are broadly addressed.

EPR's pertaining to surface water management seek to minimise discharge to waterways and utilise WSUD principles. Where infrastructure to manage surface water associated with the road and ancillary features are located within or in proximity to parkland, the impacts of the infrastructure on the values of the reserve must be well considered, planned for and managed.

The EES recognises the cultural and environmental significance of Bolin Bolin billabong throughout the EES. EPR's and relevant map book sheets reflect the area is a "no go zone" throughout construction. The UDS specifically requires the consideration of enhancements to environmental and cultural values (Map Y2 Bulleen Rd requirement 1A) and the consideration of returning flows to the Yarra River and billabongs to support river health (Map Y2 Bulleen requirement 2B). Parks Victoria supports these requirements as they align with the Yarra River Action Plan Action 22 works identified for Bolin Bolin billabong.

Protection and enhancement of the amenity of Parks throughout design, construction and operation of the new road and ancillary features

Protection and enhancement of unique parkland and broader landscape characteristics are well addressed within the UDS. The corridor wide, place specific and detailed requirements are deemed to suitably address the amenity of parklands managed by Parks Victoria.

EPR LV1 *Design to be generally in accordance with the UDS* requires urban design and landscape plans to be developed and implemented which maximise opportunities to enhance open space. Siting and design of infrastructure and interface treatments are required to have regard for the visual impact on open space, views and vistas. Key scenic view lines are well acknowledged and protection within the UDS.

Parks Victoria recommends that where landscape interface works are proposed on or abutting Crown Land, the proponent must demonstrate how built form and/ or landscaping treatment has been designed and sited to avoid conflicting with the values and management arrangements of the reserve to the satisfaction of the relevant Public Land Manager.

Sport and recreation relocation

Chapters and technical reports discuss the anticipated displacement of sport and recreation facilities and articulate potential opportunities for temporary and permanent relocations. Parks Victoria highlights that once complete, the Yarra River and Bulleen Precinct Land Use Framework Plan (YRBP LUFP) will be the leading strategic document guiding land use change within the precinct. This plan is the appropriate strategic planning tool to steer sport and recreation relocation. EPR LP3 *Minimise inconsistency with strategic land use plans* requires the project to "...minimise impacts on ... open space ... from project development and operations which are inconsistent with strategic land use policy" and EPR SC4 *Minimise impacts on sporting, recreation and other facilities* requires the identification and accommodation of displaced facilities where practicable. Parks Victoria supports these EPR's, noting the current development of the YRBP LUFP. The 2008 Yarra Valley Parklands management plan does not identify active sporting infrastructure on Parks Victoria land. Parks Victoria considers any potential relocation of displaced sporting and recreation facilities, as identified within the EES, must be consistent with the YRBP LUFP, broader Yarra Strategy Plan (being developed) and the Yarra River Protection Act.

Temporary occupation and ancillary infrastructure

Parks Victoria supports EPR LP1 *Minimise land use impacts*, which requires the project to be designed and constructed to "minimise the design footprint and avoid, to the extent practicable, any temporary and

permanent impacts on ... parks and reserves ...". The UDS addresses Public Open Space in Section 7, and specifically requires encroachment and impact of freeway infrastructure on open space to be minimised. This is critical in protecting the unique values of public reserves. EPR LP2 *Minimise impacts from location of new services and utilities* requires the project to minimise impacts on recreational facilities. It is Parks Victoria's expectation that this would extend broadly to parklands, consistent with the UDS. It is considered that this EPR should be expanded to address parklands more broadly noting that these areas protect significant cultural and environmental values in addition to providing open space purely for recreational purposes. Below ground works also should be addressed given infrastructure has the potential to impact the intrinsic values of parklands. Further, where works are proposed on Crown land the proponent must engage with the relevant Public Land Manager and gain consent under the relevant head of power.

It is acknowledged that a portion of Banksia Park is anticipated to be used for TBM retrieval and a portion of Yarra Flats will be used for construction purposes. Other ancillary impacts generally relate to path construction and will occur within Yarra Bend Park also. The Surface Water Technical Report identify WUSD subsurface storage and bioretention facilities are identified within or in close proximity to the Parks Victoria Estate.

Where infrastructure is to be located within parkland, siting, design and management requirements must to have regard for operational, cultural, environmental and visual impacts. Access requirements to ancillary infrastructure and services must also be considered and planned for. Demonstrated efforts to minimise and avoid infrastructure within parks and reserves must be made.

Communication & operational continuity and safety

Parks Victoria emphasise the need to be meaningfully engaged early in relation to design and construction works planned adjacent to the PV estate and critically within the park network. This includes and planned disruptions to access to or within the Parks Victoria estate. Such communication and collaboration is necessary to;

- ensure Parks Victoria staff and visitor health and safety are appropriately managed at all times
- enable Parks Victoria to contribute valuable operational expertise to relevant project elements
- ensure consistent messaging to Parks Victoria staff and visitors regarding project elements and changes to the parklands as necessary
- enable Parks Victoria appropriate time to modify operational management of impacted areas as necessary

It is appreciated that temporary interruptions to park visitors and management arrangements throughout construction will be minimised where possible.

Parks Victoria looks forward to working with NELA to ensure the project protects and enhances the impacted parks and reserves network.

Should you require further advice on this matter please contact Lauren Gilbert, Regional Planning Officer on (03) 8396 6505

Yours sincerely,

Stuart Hughes
Director Park Planning and Policy
Parks Victoria

Appendix 1.

EPR	Exhibited wording	Proposed wording	Rationale
<p>EPR T1 <i>Optimise design performance</i></p>	<p>Optimise the design of the works in consultation with appropriate road management authorities, public transport authorities, relevant land managers and local councils as part of the detailed design process to: Minimise adverse impact on travel times for all transport modes, including walking and cycling Maintain, and where practicable, enhance the existing traffic movements at interchanges Design interchanges and intersections to meet relevant road and transport authority requirements Maintain, and where practicable, enhance pedestrian movements, bicycle connectivity, and shared use paths Work with relevant public transport authorities to minimise impacts on buses, trams and rail and, where practicable, enhance public transport facilities and services that cross or run parallel to the alignment of North East Link Minimise loss of car parking in consultation with relevant local councils.</p>	<p>Addition of: <i>enhance safe and efficient vehicular and pedestrian access to public parks and reserves. Where alterations to access are proposed, the relevant Public Land Manager must be consulted”.</i></p>	<p>To ensure the project deliver enhanced access to open space.</p>
UDS element			
<p>UDS at Point 2M pertaining to the Map Y1 Manningham Interchange</p>	<p><i>*Consider future options for vehicle and pedestrian access to the Heide Museum of Modern Art.</i></p>	<p><i>*Consider future options for vehicle and pedestrian access to the Heide Museum of Modern Art and Banksia Park</i></p>	<p>To acknowledge that access to and from Banksia Park also warrants consideration.</p>