

Submission Cover Sheet

North East Link Project EES IAC

704A

Request to be heard?: yes

Full Name: Michael David Reece

Organisation: Victorian Transport Action Group

Affected property:

Attachment 1:

Attachment 2:

Attachment 3:

Comments: Addendum to original submission dated 26 July 2019 – see attached.

VTAG SUPPLEMENTARY SUBMISSION ON DOCUMENT 34C

This Submission is supplementary to the Victorian Transport Action Group, Submission 704. It is in response to the very limited comments by the proponent concerning the proposed Doncaster Busway in the Tabled Document 34c.

The time for VTAG to present evidence is not until Sept 5th and there are important points that the Panel should be asking questions of the expert witnesses appearing on behalf of the proponent.

The Victorian Transport Action Group submission focusses on the Busway proposal and the failure to properly document the design. In particular, the proposed Busway should be rejected because:

- *it fails to deliver the necessary capacity to cope with the forecast public transport demand in 2030 and to provide relief on the radial commuter traffic volumes east of Bulleen Rd –*
- *Is not a fully separated Busway, as claimed in the EES, for two kilometres east of Hoddle St*
- *Lacks sufficient bus stations to serve the public transport catchments on the route*
- *inadequate design and operational standards to achieve a Gold Rating under the international recognised ITDP standards for Bus Rapid Transit.*

The estimated \$500 million cost of the Busway represents just 3% of the total budget yet it will carry 20% of the people using this transport corridor

Normally a \$500 million project would be subject to close scrutiny – but the Doncaster Busway looks like it could slide through without scrutiny on the coat-tails of the larger North East Link project.

Key points the Panel should consider at this stage are:

1. The responses given by the NELP on the issue of the busway at item 54 of document34c are completely inadequate.
2. Again, the NELP claim no responsibility for the design and operation of the Busway on the grounds it is the responsibility of the Department of Transport.
3. However, the NELP is itself a part of the Department of Transport – within the administrative office of the *Major Transport Infrastructure Authority* which is directly accountable to the Secretary for Transport
4. The failure to present an integrated transport solution, as required under the *Transport Integration Act* is a basic flaw which prevents endorsement of the Environmental Effects Statement in its current form.
5. **Over the next two weeks the Panel and its Counsel Assisting should keep raising the Busway issue with government and expert witnesses to adequately explore the issues raised in the 19 objector submissions that raise the Busway problem.**

6. The Panel should seek the additional information as listed on Page 5 of the VTAG submission. This is necessary to adequately understand and assess what is actually proposed in relation to the NELP project including the Busway.
7. Of particular concern, is the misrepresentation of the Busway as “fully segregated” when there is no segregation for a distance of up to 2 kilometres east of Hoddle St.
8. The Panel should test the credibility of the repeated assertion that the Busway design does not effectively prevent a subsequent construction of either a light rail or heavy rail option on the same alignment. The financial penalty is prohibitive.
9. The Panel should request a full statement from the Secretary for Transport on the proposed complementary measures to be delivered as part of the project, including those improvements to public transport and the replacement of lost open space outside the designated project area.
10. In relation to my own submission, 855 the NLP has made no response so far to the proposal for an alternative point for the junction with the Eastern Freeway which would remove the threat to the sports fields at Bulleen and potentially be a cheaper option and more effective as a ring road.
11. It is also noted that there is still no proper accounting for the area of open space permanently and temporarily to be lost and there are very vague statements about the extent to which this will be replaced by open space of similar quality.

Mike Reece,
Secretary, Victorian Transport Action Group

26th July 2019