

Submission Cover Sheet

North East Link Project EES IAC

679

Request to be heard?: yes

Full Name: Carmel McCormack

Organisation: PLanning Institute Australia (Victoria)

Affected property:

Attachment 1:

Attachment 2:

Attachment 3:

Comments: PDF submission is attached below

7 June 2019

Planning Panels Victoria

Background

The Planning Institute of Australia (PIA) is the national body representing planning and the planning profession. The responses that PIA provides to Government during consultations are delivered pro-bono and represent independent peer reviewed analysis by the one profession with skills and experience that have overview of all project elements dedicated to providing better community outcomes. This submission is made by the Victorian Committee of PIA.

PIA policies

PIA has a range of policies that are relevant issues to the North East Link project, including:

- **Integrated Land Use and Infrastructure Planning:** Strategic planning and infrastructure planning must be integrated to achieve optimal outcomes for places.
- **Infrastructure Appraisal and Prioritisation:** Infrastructure appraisal approaches should recognise the spatial context and respond to the wider economic, environmental and social costs and benefits over the long-term term planning horizon and whole-of-life of an asset, including published full project business cases for major project evaluation – including Triple Bottom Line assessment and wider economic effects, and planning outcomes should not be compromised by the project delivery and financing approach.
- **Infrastructure Funding and Value Sharing:** must be transparent, be justified and actioned via a comprehensive infrastructure funding and delivery plan.
- A 2016 joint policy statement from eight peak bodies, including the Australian Local Government Association, Institute of Public Works Engineering Australasia, Planning Institute of Australia, Australian Logistics Council, Urban Development Institute of Australia, Property Council of Australia, National Farmer's Federation and Green Building Council of Australia called upon Government to invest in public infrastructure that is linked to strategic plans, meets cost-benefit

principles, and is linked to the priorities identified by Infrastructure Australia.

- Policy planning for healthy communities: Facilitate an increased proportion of journeys by active transport (such as cycling and walking) to improve both physical activity levels and create a more sustainable environment.
- Climate Change: PIA principles promote strategies that seek to reduce the overall demand for non-renewable sources of energy, reduce greenhouse gas emissions and support the shift to renewable energy.

PIA Victoria has previously emphasised to Government the need for the implementation of the Transport Integration Act 2010 to enable integrated infrastructure and land use planning delivering transparent and evidence-based planning in order to *“help reduce the current reliance on piecemeal, mega projects which do not effectively contribute to delivering long-term solutions to entrenched transport problems.”*

The PIA submission to Infrastructure Victoria’s 30-year strategy called for a focus on planning for a low carbon future to be emphasised in the planning and delivery. It is noted that in Dec 2016 Infrastructure Victoria identified the North East Link as a project required to improve the efficiency of freight supply chains. However, PIA’s position is that full consideration of Sustainable Urban Mobility, as distinct from construction projects, is critical to Melbourne’s future success, requiring a level of consideration it does not currently appear to be receiving.

Strategic Justification

Many established world cities are planning for more liveable and less car-dependent cities. Melbourne’s exceptional growth does require big, significant transport infrastructure projects, but they are being undertaken without adequate understanding of the future city it is seeking to serve due to the shortcomings of Melbourne’s existing strategic planning.

PIA is concerned that infrastructure of the scale, impact and expense being proposed does not have the benefit of being informed or supported by a comprehensive transport plan for metropolitan Melbourne. Victoria’s *Transport Integration Act* of 2010 mandates such a plan to enable informed choices and priority-setting for transport policies and investment allocation. This has not occurred in almost a decade since the promulgation of the legislation.

PIA advocates that as transport is inextricably inter-dependent with land use, planning for both must be combined, integrating diverse aspects of movement, settlement and population including economic prosperity, environmental sustainability, health and wellbeing on a metropolitan wide scale.

The Scoping Requirements for the North East Link Project Environmental Effects Statement state that “Preparation of the EES and the necessary investigations should be consistent with the principles of a systems approach”. The use of the principles of a systems approach contains within it an extremely wide interpretation. It is therefore reasonable to suggest that the precautionary principle falls within this collective theoretical framework and should be applied to a project of such significance.

PIA advocates for this interpretation of the material set out in the North East Link Environmental Effects Statement by the Panel.

Response to Existing Conditions

As outlined in technical report A, PIA recognises that truck demand through the north-east is primarily facilitated via the Greensborough Road – Rosanna Road – Bulleen Road corridor, as well as Fitzsimons Lane - an area of primarily residential land uses along both corridors with the benefit of extensive truck curfews operating throughout the region.

The question for examination is whether the Reference Project appropriately addresses this problem in a cost-effective and community-supporting manner without creating an adverse impact on the community.

Key Issues

PIA appreciates that the Planning Controls proposed to implement the Reference Project will include an Incorporated Document which will require the preparation of an Urban Design Strategy and Urban Design and Landscape Plans for approval by the Minister. The purpose of the Urban Design Strategy and Urban Design and Landscape Plans is to guide the design of the final built form of the project including public realm, infrastructure and landscape outcomes.

In addition, a Specific Control Overlay is proposed which will tailor conditions, including secondary consents, to ensure that the further design, use and development of North East Link achieves specified outcomes, thereby ensuring that there will be an opportunity to further comment on the design detail as the Reference Project progresses to ensure the best built form and landscape design outcomes can be achieved.

PIA also anticipates that as the project is realised, opportunities for value capture throughout the project route will be further investigated and incorporated.

With regards to the matter at hand and to assist the Inquiry and Advisory Committee (IAC), PIA has identified the following key issues of relevance (see Table 1) and trust each matter will be given due consideration through this important process.

Thank you for the opportunity to comment on the North East Link EES and proposed Planning Scheme Amendment.

PIA Victoria seeks an opportunity to expand on this submission at the Inquiry and Advisory Committee hearing.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Laura Murray'.

Laura Murray RPIA
Planning Institute Australia
President Victoria

Table1: Planning Institute of Australia identification and response to specific issues identified by the North East Link project

Reference Project Issue	PIA Response
<p>1. The traffic and transport impact assessment has assessed a North East Link reference project which does not include a design for the Bulleen Road Park and Ride. The scope of the facility is currently being developed in consultation with Transport for Victoria. This includes the number of proposed parking bays, access facilities and general traffic/bus access arrangements. Once this scope has been finalised it will be communicated to all project stakeholders</p> <p>2.</p>	<p>The significant upgrade of this facility is a critical piece of transit related infrastructure and a component of the project that must be included as part of the Reference Project. Without this vital piece of the puzzle, the IAC is determining an ad hoc, pre-mature project that does not give certainty to the community or affected Municipalities in terms of the full services to be provided to encourage alternative sustainable modes of transport.</p>
<p>3. Doncaster Park & Ride</p>	<p>The current Doncaster Park & Ride is already “oversubscribed” with little room for expansion. It is PIA’s position that a substantial built parking station at this location and increased service provision is an essential component of the Reference Project requirements. It is Manningham Council’s position that the location should be a TOD centre supporting the surrounding community. PIA supports this position and suggests that an opportunity for value capture of the retail site exists to part fund the built parking facility for the Doncaster Area Rapid Transit (DART). This is particularly attractive to Government as the site is owned by VicRoads.</p>
<p>4. Walking and cycling infrastructure</p>	<p>PIA submits that all active transport opportunities, including those with minimal connection to the project area (e.g. connection to the M80, Templestowe Road shared path) must be prioritised for connection and included within reference project in order to achieve overarching Government policy objectives. If they fall out of scope due to time commitment, then development of a funded program of</p>

	<p>delivery is required.</p> <p>Overall, PIA supports the project approach to the provision of new active transport infrastructure.</p>
<p>5. Concerns North East Link and the upgrades to the Eastern Freeway will encourage more people to drive, particularly to the CBD, increase general congestion and discourage the use of other transport modes</p> <p>6.</p>	<p>PIA generally supports project assumptions on this matter, conditionally upon the provision of further public transport and active transport infrastructure as part of project delivery rather than as currently proposed.</p>
<p>7. The Doncaster Busway</p>	<p>PIA supports the separation of existing bus services from the Eastern Freeway traffic flow and the opportunity to upgrade this to an alternative transport mode in the future.</p> <p>PIA's position is that the opportunity presented by this substantial investment must be optimised by creating a Bus Rapid Transit (BRT) system with stations at strategic locations en-route to increase public transport take-up.</p>
<p>8. Watsonia Station - It is likely that at least half the existing car parks at Watsonia railway station would need to be relocated for two to three years. An alternate car park could be provided within the 4-metre wide high voltage power easement to the east of the station. Subject to the requirements of the owner, AusNet, it is expected that up to 534 bays could be accommodated at this location while leaving enough space around the power infrastructure to enable AusNet to access its asset.</p>	<p>PIA believes that this proposition should be fully tested and not taken at face value. The significant risk of electrical arcing within high voltage power easements is a real and potentially deadly risk. Statements suggest that this has not been fully investigated, leaving assumptions about carparking provision at Watsonia Station untested and not credible.</p>
<p>9. DART services have higher patronage compared with other metropolitan buses. Despite their popularity, the DART services</p>	<p>PIA's position is that significant investment into park and ride projects and built parking stations, in addition to a commitment to planning improved service delivery and</p>

<p>experience several issues which affect their patronage and quality of service:</p> <ul style="list-style-type: none"> • Doncaster Park and Ride is often at capacity by 7:00 am on weekdays, requiring passengers to park in adjacent streets, sometimes up to one kilometre away. • Service frequency and capacity: DART buses operate at capacity during the peak periods, with extensive over-crowding of services leading to the formation of long queues at the Doncaster Park and Ride facility. This is despite the fact that peak service frequencies are generally high. In peak periods the routes operate at approximately six-minute headways, and approximately every 15 to 30 minutes during the rest of the day. 	<p>frequency, must all be a consideration of this project.</p>
<p>10. Conflicts between active travel and traffic: As private vehicle travel dominates throughout the north-east, pedestrians and cyclists often encounter barriers in the form of congested roadways. These roadways often represent barriers to active transport because they have been planned to prioritise traffic movements. This can come at the expense of pedestrians and cyclists in the form of high traffic volumes, a large proportion of heavy vehicles, high sign-posted speeds as well as reduced footpath quality and bicycle lane coverage.</p>	<p>PIA supports the improvements to Active transport infrastructure proposed by the project. However, PIA advocates for greater integration and connectivity of new infrastructure with existing bikeways/pathways to successfully deliver the required improvements and linkages needed to provide a fully integrated pedestrian and transport network.</p>

<p>11. Review Urban Floodway Zone (UFZ) within project area</p>	<p>PIA strongly advocates that the areas zoned Urban Floodway Zone (UFZ) are reviewed as a priority. There is doubt about the accuracy of the boundaries of the UFZ within the project area and along the Yarra flats. This zone is extremely restrictive and should only be used on land for which it is definitely required. If land in this zone was in the Land Subject to Inundation Overlay (LSIO) (for instance) or another appropriate planning tool, then the opportunity arises to use it for a recreational purpose with associated built structures.</p>
<p>12. Northern Portal section, once project emerges from tunnel</p>	<p>The northern portal section, where the tunnel emerges, has been given a novel treatment, where instead of a long trench with few road and active transport crossings, a series of broad cut and cover platforms with suitable depth of soil for supporting mature trees is proposed. This is a substantial improvement to typical open trench freeway construction. PIA understands that the length of the covered sections is limited by the need for exhaust stacks required in a covered tunnel design. PIA's position, however, is that it is much preferred to optimise the usable at-grade space by cut and cover and to use exhaust stacks as urban art opportunities for the longest distance possible. This is particularly relevant in order to maximise opportunities for active recreational open space to be utilized for both formal sports and informal use.</p>
<p>13. Partial loss of existing open space and recreational facilities (including loss of Oval 3 at Bulleen Park, Freeway Public Golf Club, Archery / Aero modelling site)</p>	<p>It is PIA's understanding that replacement land to offset that lost for certain recreational uses is proposed as part of this project.</p> <p>Given that this project endeavours to cater not only for current traffic needs but has included anticipated needs into the future to accommodate the growth of our state up to 2036, PIA recommends that a similar approach be applied to recreational needs and that a recreational needs analysis be undertaken for future emerging community needs and not only response to the existing situation.</p>

<p>14. Maximise State Significant Community Assets - Heide Museum</p>	<p>The Heide museum is of State significance and opportunities should be considered to improve access and promotion of this museum through this project, like the McClelland Gallery in Frankston through the East Link project.</p>
<p>15. Landscape improvements to Thompsons Rd</p>	<p>PIA believes that the project creates the opportunity to deliver a 'gateway boulevard' and support a safer pedestrian/bicycle environment along Thompsons Road. This should be a requirement of the Reference Project</p>
<p>16. Bulleen Industrial precinct</p>	<p>It is PIA's understanding that the project intends to compulsorily acquire the land where this industrial estate is established and optimise a value capture opportunity following the completion of the project. PIA does not object to this proposal, however, is of the view that the Reference Project should partner with Council to identify suitable alternative locations for the existing businesses. Each business currently plays an important role in both providing a service to residents and driving the local economy and should therefore be given due consideration in this regard.</p>
<p>17. Protection of waterways, wetlands and ecology</p>	<p>It is PIA's expectation that the protection and enhancement of waterways, wetlands and sensitive ecology affected by and adjacent to the project are fully considered in project planning and implementation.</p>