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<th><strong>Full Name:</strong></th>
<th>Andrew Lees</th>
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<td><strong>Organisation:</strong></td>
<td>Riverland Conservation Society</td>
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<td><strong>Affected property:</strong></td>
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**Request to be heard?:** yes
Riverland Conservation Society of Heidelberg Inc.

Submission in response to the Environmental Effects Statement of the North East Link proposal

Introduction

This submission is focused on the environmental effects of the North East Link road project on the Yarra Flats Park, The Yarra River between Banksia Street and Burke Road and the residential area adjacent to the park.

Riverland Conservation Society of Heidelberg Inc. has been involved in the conservation of Yarra Flats Park and its environs for nearly 40 years and has a wealth of understanding of the area.

It is clear that there will be many adverse effects from the NE Link on the Yarra River environment and its nearby residents on the Ivanhoe side of the Yarra River between Burke Road and Banksia Street. Several of these are outlined below.

It is disappointing that little attention has been made to the effects on this area despite several meetings with NELA officials. Unfortunately noise, air pollution, visual intrusion, effects on water quality in The Yarra River and construction inconvenience do cross rivers and will have significant effects.

Yarra Flats Park Wetlands and The Annulus Billabong

Riverland Conservation Society is strongly advocating that environment work should be carried out in Yarra Flats Park to compensate for and offset, to some extent, these adverse effects. Other sections of the freeway project will result in very major environmental loss and this can be offset to some extent by improvements to the environment elsewhere such as in Yarra Flats Park.

Our preferred environmental work is to construct wetlands south of Banksia Street (Banksia Wetlands) that would be fed by diverting the Banksia drain that runs under Banksia Street. Water from these wetlands would then supply clean water into The Annulus Billabong and an adjacent billabong.

This project would reduce nutrient runoff into The Yarra River from the Banksia drain. It would also have the potential to raise ground water levels in the area.

The Annulus Billabong is one of Melbourne Water’s 11 key wetlands along the Yarra River. Billabongs in this area have significant cultural, environmental and amenity value and are an important part of the Yarra landscape. Yarra Flats Park, including Annulus Billabong and the proposed Banksia St Wetland has the potential to form part of outstanding natural precinct including Bolin Bolin Billabong on the eastern bank of the Yarra. We note that a proposal to incorporate this into an even larger Arts and Environmental precinct is being seriously considered by numerous parties.

Melbourne Water has informed us that they are considering this proposal seriously and detailed studies of the Banksia Wetlands and Annulus scheme are underway. Melbourne Water are currently investigating the water requirements of the Annulus Billabong and the potential for these requirements to be met by the proposed Banksia Street Wetlands. This project would have multiple benefits including improved water quality for the Yarra (by treating stormwater from the Banksia St catchment), improved vegetation quality within Annulus Billabong and increased waterbird and frog habitat.
This investigation is currently running until October 2019, however there is currently no funding available for the implementation of any outcomes from the investigation. Funding is a concern as it is likely to cost several million dollars to build.

The proposal will improve water quality, liveability and environmental outcomes for the Yarra River.

**Adverse effects from the NE Link on our area**

**Water quality**

We note that there will be effects on surface water runoff from the 700,000 sq m of extra paved area and the alterations of creeks resulting from the NE Link. This will have effects on the Yarra River. This will be mitigated to some extent by the construction of various basins.

Groundwater levels and contamination is also an issue that has the potential to impact upon Yarra Flats Park and The Yarra River water quality.

**Noise**

We note that the EES has not properly assessed the noise effects on Yarra Flats Park and residents living in East Ivanhoe adjacent to the Yarra Flats between Banksia Street and Burke Road.

Residents along Gruyere Crescent for example are 400m from the Eastern Freeway and noise effects on them have not been considered adequately. The current noise levels there are quite significant and on our readings can exceed 63dB especially when there is any southerly wind blowing or on still nights. Noise travels easily across the valley where there is little to absorb it. The standard of 60Db for passive recreational areas is a high level and incompatible with this park use.

The level of noise in the Southern section of Yarra Flats Park, by our readings, exceeds 60Db regularly. This noise level is very obtrusive and detrimental to the enjoyment of this section of the park. Some sections of the park are less than 100m from the freeway.

We contend that the stipulated maximum noise levels of 60Db in a passive recreation area will disturb people’s enjoyment of natural areas and are excessive. These levels are clearly being exceeded already.

With increased traffic on the Eastern Freeway after the planned constructions all these noise levels will be even more elevated than at present.

We note the latest World Health Organisation 2018 Environmental noise guidelines for the European Region which indicate that there will be adverse health effects of noise levels that will be experienced by our residents.

*Road traffic noise Recommendations*

For average noise exposure, the GDG strongly recommends reducing noise levels produced by road traffic below 53 decibels (dB) Lden, as road traffic noise above this level is associated with adverse health effects.

For night noise exposure, the GDG strongly recommends reducing noise levels produced by road traffic during nighttime below 45 dB Lnight, as night-time road traffic noise above this level is associated with adverse effects on sleep.

To reduce health effects, the GDG strongly recommends that policy-makers implement suitable measures to reduce noise exposure from road traffic in the population exposed to levels above the guideline values for average and night noise exposure. For specific interventions, the GDG
recommends reducing noise both at the source and on the route between the source and the affected population by changes in infrastructure.

Clearly the noise guidelines for Victoria are totally inadequate to protect the health of our population.

The northern end of the Yarra Flats Park lies adjacent to the Manningham Road interchange and is only 100m from it at its closest point. Again no assessment appears to have been made of the noise effects on the park and no noise barriers appear to be present in existing plans. We do acknowledge that reduced traffic on Banksia Street will reduce noise from this source.

Construction noise from the Manningham Road interchange has the potential to be detrimental for the northern area of the park and adjacent residents. Will night-time movements of trucks carrying tunnel spoilage be occurring?

We believe further assessment of noise effects - including during construction - on the northern section of Yarra Flats Park should be undertaken and any measures to reduce this taken.

We strongly advocate that there should be noise barriers along the northern side of the Eastern Freeway between Burke Road and the cutting prior to Bulleen Road (less than 1km) to protect the Yarra Flats Park and adjacent residences.

We also strongly advocate improved road surfacing to reduce noise - such as employed on the Chandler Highway reconstruction.

There is no indication of whether trucks will be carrying spoilage from tunnelling at night and how much noise this will create in our area - including Banksia Street.

Air Pollution

We note that air quality will be reduced around the southern ventilation structure, particularly in regard to a significant rise in PM2.5 emissions. We view this with grave concern as these particles are accepted as having major deleterious health effects by the WHO.

We believe that consideration should be given to filtering the air edited from the structure.

We also note that air pollution from the Eastern Freeway will increase by 25%-33% along the Bulleen Rd to Hoddle Street section. With any southerly wind direction this will be spread over our residential area and parkland - particularly the southern section of Yarra Flats Park.

A significant number of our residents will be living within a kilometre of the busiest road in Melbourne and no assessment of the likely health effects and costs of this has been undertaken - along with the rest of the Eastern Freeway upgrade.

Visual impact and tree removal

No assessment of visual impact on Yarra Flats Park has been done. There is the potential for visual impact from the Manningham interchange on the northern section of the park. This should be easily mitigated with planting of trees between the interchange and the Yarra River.

The southern ventilation structure will be very prominent from large sections of the Yarra Flats Park and most of the residential areas on the hillside above the park.
There will be a significant visual impact on the southern section of the park from the removal of trees on the northern side of the Eastern Freeway, which is only 50m from the park.

Traffic issues

Traffic along Burke Road North is a significant issue for residents in our area. Morning peak congestion causes rat running along The Boulevard between Banksia Street and Burke Road North which has a very significant detrimental effect on Yarra Flats Park. We are very keen to see the maximum traffic diverted onto the NE Link from Burke Road North. The arrangement of the interchange at Lower Plenty Road seems to be a discouragement for traffic travelling west on Lower Plenty Road to use the NE Link instead of Rosanna Road and Burke Road North.

Summary

We believe that the North East Link proposal will have significant detrimental environmental effects on our area of interest and that better and greater efforts need to be made to ameliorate these and to compensate for them.

We recommend NE Link include funding for the restoration of wetlands in Yarra Flats Park via the diverting of the Banksia drain.

We are advocating for measures to reduce noise pollution such as noise barriers on the northern side of the Eastern Freeway east of Burke Road and improved road surfaces, along with a better assessment of construction noise on our side of the river.

We are advocating for investigation of better methods to improve the quality of the air emitted from the ventilation structures.