

Submission Cover Sheet

North East Link Project EES IAC

848

Request to be heard?: yes

Full Name: Chris Harper
Organisation: Elgar Park Regional Hockey Association
Affected property: Elgar Park, Mont Albert North
Attachment 1: eprha_ees_submi
Attachment 2: eprha_ees_submi
Attachment 3:
Comments: Refer to attachment

ELGAR PARK REGIONAL HOCKEY ASSOCIATION

ABN 59 742 408 047

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7 June 2019

Address

To Whom It May Concern:

RE: North East Link - EES

Elgar Park Regional Hockey Association Incorporated (EPRHA) is the developer and manager of the hockey facilities at Elgar Park in Mont Albert North. EPRHA's operations will be significantly impacted by the works proposed in Elgar Park for the North East Link project, specifically the civil works associated with the north west oval to increase its capacity as a stormwater retention basin and the location of the works compound on the north east oval for a period until 7-8 years from now.

Since 1993 EPRHA has held a long-term ground lease with Whitehorse City Council. In accordance with the terms of that lease, EPRHA has developed the hockey facilities over a number of stages and has invested over \$1,500,000 in developing the hockey facilities, all self-funded and financed through member contributions and the commercial operation of the facility. The most recent project undertaken by EPRHA was a total rebuild of the hockey pitch, upgrade LED pitch lighting and associated facilities, completed in stages from 2015 through to early 2019. The cost of this project was approximately \$750,000, of which \$340,000 has been borrowed.

EPRHA relies on the support of Council in providing a bank guarantee to support a loan to finance this project. The Elgar Park hockey facilities are used intensively throughout the year and EPRHA relies on ground hire income from a range of users to service the loan repayments in accordance with its arrangements with Council and EPRHA's bank.

Hockey pitches have a useful lifespan of approximately 10 years before resurfacing is required to maintain a safe and reasonable quality playing surface. EPRHA's business and cashflow modelling has been based upon prior evidence of demand for the facilities and a forecast of future earnings from pitch hire, which is our only source of income. Any disruption to our operations will have a direct impact on our income streams, ability to service our loan obligations and may result in the Council bank guarantee being called upon. Additionally, partial disruption to our operations will impact on our ability to resurface the pitch within its 10-year lifespan and impact on the safety and quality of the playing surface.

The North East Link Authority has not consulted EPRHA as a business operation during the community consultation process. Although they did consult us as a sporting organisation it has only become apparent through the EES documentation that there was a business consultation process also occurring and we should have been included in this process.

The North East Link Authority proposes to modify the stormwater retention basin located on the north west oval of Elgar Park as part of the project. A portion of Elgar Park is covered by a LSIO overlay and this includes part of the hockey field. EPRHA was prepared to develop its facilities in this LSIO based on a risk assessment of the current circumstances, having regard to the likelihood of a flood event occurring that would impact the hockey field and having regard to the potential damage impact of any potential flood event. The surface water technical report refers to "Some localised increases in flooding in this area [note - inclusive of Elgar Park] are limited to parklands with no impact to private

properties. The increased risk of flooding of the EPRHA facilities needs to be clearly detailed so that EPRHA can assess the risks and determine if insurance of its assets against flood damage is now prudent.

In regard to the technical reports appended to the EES documents we note that the performance requirements proposed are of a high-level nature (“motherhood statements”) and do not allow us to comment specifically on the potential impact on our operations. Therefore, we require the following conditions to be included in any recommendations regarding the EES process:

- The North East Link Authority be required to consult EPRHA in regard to the impacts of the project on its business operations.
- The North East Link Authority be required to reach agreement with EPRHA in regard to mitigation of impacts on EPRHA’s business operations and any compensation relating to loss of income during the period of occupation of Elgar Park.
- The North East Link Authority be required to consult with, and seek the consent of, EPRHA in regard to:
 - Hours of operation within Elgar Park for any works to be conducted within Elgar Park and/or the hours of operation of any site office, car parking facility, material storage facility or similar within Elgar Park.
 - The location, nature and design of any hoardings/fences to be erected for the project to eliminate negative impacts on visual amenity within the park that may discourage use of the hockey field and/or impacts on traffic, parking or pedestrian access to the park generally and the hockey field in particular.
 - The proposed measures and monitoring methodology to control dust from the project to prevent impacts on playing activities on the hockey field. The plan should mitigate the health risks to players and to prevent damage to the playing surface and preserve reasonable enjoyment of the hockey facilities.
 - The proposed measures and monitoring methodology to control noise from the project to prevent impacts on playing activities on the hockey field and to preserve reasonable enjoyment of the hockey facilities.
 - The proposed measures and approach to mitigate the loss of car parking facilities and accessibility to the grounds.
 - The impacts of the proposed flood mitigation / stormwater retention works on the potential flooding of Elgar Park and where increased risk is experienced by EPRHA, compensation is provided for the cost of insuring EPRHA’s assets against flood damage.
 - The proposed construction management plan for all works to be undertaken in Elgar Park.

Yours sincerely,

Chris Harper

Chris Harper
President
Elgar Park Regional Hockey Association

CC: Mike Hanlon
President
KBH Brumbies Hockey Club

Whitehorse City Council