

Submission Cover Sheet

North East Link Project EES IAC

281

Request to be heard?: yes

Full Name: Bruce Fethers

Organisation: Mini Maestros

Affected property:

Attachment 1: Submission_on_N

Attachment 2:

Attachment 3:

Comments: Please see attachment.



Submission on Environmental Effects Statement ("EES") for North East Link Project ("Project")

Summary of Submission

The Submitter is a business within the Bulleen Industrial Precinct

The impact of the Project on the Bulleen Industrial Precinct community has in part been understated and in part unrecognised.

The Environmental Performance Requirements ("EPRs") seeking to address impacts on the Bulleen Industrial Precinct community are inadequate.

The lack of social or health EPR's regarding acquisition of commercial land and businesses means the EES has failed to meet its objectives of assessing how the Project could impact the health and social aspects of the environment and how those adverse impacts can be managed.

Details of Submitter

This submission is made by Major Maestro Pty Ltd, trading as Mini Maestros. We are a family owned business employing 21 staff. We are also a franchisor and have 32 franchisees who with their staff number another 50 persons.

Our business is located at 21 Bridge Street Bulleen. This leased premises is the Head Office for Mini Maestros. Mini Maestros is a pre-school education business with over 4,000 enrolled students under the age of 5 across Melbourne. We also provide music classes in early learning centres across Melbourne. No classes are conducted at our premises in Bridge Street; our premises is used for administration, distribution of teaching materials and teacher training.

Located in Bridge Street, we believe our business occupies one of the properties to be acquired to facilitate the Project (construction zone 20).

We have an on-site staff of 7 and we provide support from this site for approximately 70 teachers located throughout Melbourne, Geelong and the Macedon Ranges, all of whom regularly call into our office.

Major Maestro Pty Ltd trading as Mini Maestros ABN 27 128 856 771

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We have recently commenced a second 5-year lease of our premises. When we relocated to Bridge Street in 2014, we fitted out our premises to our particular requirements: offices, equipment storage/distribution, training, meetings. When taking on this premises our expectation was that we would be in this location for the long term and invested in our set up accordingly.

Our location within the Bulleen Industrial Estate is ideal due to:

- Permitted use under the local planning scheme.
- Central location within Melbourne with good access by road for all our teachers.
- Affordable rent (due to the industrial location) for the size of premises

When compulsorily acquired, we will face the difficult task of trying to find another centrally located premises, suitable for our use and at an affordable rent. The lack of nearby industrial zoned land to Bulleen will be a very limiting factor.

Understated Consequences of Impact

We believe the consequences of the impact of the Project on the Bulleen Industrial Precinct are understated in the EES.

The Bulleen Industrial Precinct operates as both an industrial community and as an asset for the wider regional community:

1. A striking feature of the Bulleen Industrial Precinct is the industrial community that works within it. This is a community with its own character and which displays mutual cooperation and support. This is probably as a result of so many of the businesses having been established in the area for so long and also as a result of so many of the businesses being small and family owned. The community element is evidenced by the better basic amenity of the Precinct compared to other industrial precincts.

The EES recognises the strong social ties among business owners, employees and the local community. It refers to the valuable long-standing relationships and the diversity in employment pathways offered in the Precinct. But these observations are on the interface of the Precinct with the wider community, they do not address the social aspects of being a member of the Bulleen Industrial Precinct community. The breakdown in the social networks caused by acquisition of commercial properties is noted as having a Medium Risk rating, but the commentary refers to stress on individual businesses and individuals only, not the stress on a whole community and the consequences of that.

The removal of the Bulleen Industrial Precinct to make way for the Project is not only the removal of industrial land, it is the dispersal of the majority of a

community. That loss of community is not addressed by the EES – the EES deals with loss of industrial land, impacts on individual businesses, jobs, an observation on clustering (without acknowledging the impact that the loss of the clustering will have on the displaced businesses). The EES fails to address:

- The impact on the wider community from the loss of the Bulleen Industrial Community – loss of proximate services, loss of industrial community which contributes to the overall fabric of the community in Manningham and more widely, in Melbourne.
- The impact on the Bulleen Industrial community – this community will largely cease to exist and the individuals that were part of it will experience the loss/grief normally suffered when a community disintegrates or is fractured, and they will also lose the clustering effect (financial as well as social) that is one of the benefits of the Bulleen Industrial Precinct.

Compulsory acquisition of a whole residential suburb/community would be unthinkable – why is it so different for compulsory acquisition of a whole industrial precinct/community? Why is the business community (comprising owners, employers and employees) not treated with the same respect? No EPR has been formulated to address the consequences of the destruction of the Bulleen Industrial Precinct community.

2. Industrial precincts are disappearing from Inner Melbourne and being pushed out to the periphery of the urban district. This is a removal of services (and employment opportunities) for local areas resulting in the need for more and more transport of people and goods. Just and local communities should be serviced by local schools and shops, they should ideally also be serviced by local light industrial services. Removal of the Bulleen Industrial Precinct will create more traffic on roads as people have to drive further to get the services they require. The EES Conclusion notes that acquisition of land within the Bulleen Industrial Precinct would be inconsistent with local and State planning policy, but that is a passing comment only and again, no EPR has been formulated to address this.

Inadequate Business EPRs

The EPRs aimed at mitigating the impact of compulsory acquisition on business owners are limited. They are simply:

EPR-B1: inform, work with councils to identify alternative location options, implement support programs for business resilience and promotion

EPR-B2: minimise disruption to the extent practicable, try to reach agreement on acquisition terms

EPR-B6: continue to consult

What is lacking:

- Any work at a strategic State level to identify suitable land for relocation, including rezoning. Instead a piecemeal approach of “working with” individual councils, with no teeth is adopted.
- Means to compensate (in a strategic town planning sense) for the removal of the Bulleen industrial Precinct being contrary to State planning policy.
- Means to acknowledge and address the consequences of the destruction of the Bulleen Industrial Precinct community.
- Alternative designs of the Manningham Road Interchange to reduce the number of required acquisitions.
- Alternative construction area plans to reduce the number of required acquisitions
- Any measures to address the stress that potential acquisition causes to human health.
- Any measures to address the time and distraction that the Project has already imposed on affected business owners.
- Any measures regarding minimum (or maximum) timeframes for acquisitions (i.e. giving certainty and removing uncertainty).
- Any measures to investigate whether the current compensation mechanisms in the acquisition process deliver a fair outcome in the current economic and commercial property market.

Absence of Social or Health EPRs for business/commercial land acquisition

The EES fails to identify that the social impact on the Bulleen Industrial Precinct community will be major. In 17.3.1 it says, “If businesses could relocate within the vicinity of their current location, the disruption to business relationships and displacement of local jobs could be minimised.” “If” – no assessment is given of the likelihood of such relocation. Due to the absence of other sizeable areas of industrial zoned land in the vicinity of the Bulleen Industrial Precinct the likelihood is zero for most businesses. Therefore there will be a major impact and there is no EPR to address that impact. There are no solutions on the table for a wholesale relocation of Bulleen Industrial Precinct businesses within the local region.

Further, noting in the same section that ‘the disruption impacts of commercial land acquisition on business owners would range from minor to major’, no measures are proposed to ameliorate that disruption other than the 3 Business EPRs mentioned above. What is hurtful is that the EES goes on to say, “the potential for stress and worry impacts is discussed and assessed in Chapter 18 – Human health” but in fact there is no reference in Chapter 18 of the stress and worry impacts caused to affected or potentially affected business owners.

Bruce Fethers

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