

Submission Cover Sheet

North East Link Project EES IAC

386

Request to be heard?: yes

Full Name: simon exon

Organisation: city of yarra

Affected property:

Attachment 1: NEL_submission4j

Attachment 2:

Attachment 3:

Comments: see attached submission below

To: North East Link Project Team – Major Transport Infrastructure Authority

From: Vijaya Vaidyanath, Chief Executive Officer

Date: 6th June 2019

Subject: City of Yarra North East Link EES Submission

This memorandum is the City of Yarra's submission regarding the North East Link (NEL) Environment Effects Statement (EES). The first half of this memo focuses on key impacts for Yarra and how the EES responds to these. The second half provides an overview of the strategic outcomes that Council would like to see from the project to inform the scope definition, design and delivery process.

Impacts of NEL on Yarra

There are a number of areas where Yarra will be impacted both directly and indirectly by NEL. Where known, these impacts need to be understood and mitigated against. In other cases, as yet unknown issues or other 'unintended outcomes' may become apparent after the project has been completed.

It is important that this project does not result in ongoing legacy issues for Yarra and its community, particularly where these issues are difficult for Yarra itself to resolve be it due to costs and/or the need for third party cooperation.

The potential impacts of NEL on Yarra include:

- (a) Increased traffic congestion, noise and reduced amenity on arterial and local roads in Yarra;
- (b) Increased demand for cycling to and through Yarra particularly along specific corridors that tie into the proposed NEL cycleway works;
- (c) Loss of tree canopy and public open space directly as a result of NEL or other complimentary works;
- (d) Increased maintenance costs associated with new off-road shared paths delivered by NELA;
- (e) Removal of car parking to support works that complement the busway and encourage cycling for new trails;
- (f) Other potential major works in Yarra such as grade separated right turn ramps to support the busway;
- (g) Delays to street based public transport services as a result of increased traffic levels; and
- (h) Worsening conditions for cyclists as a result of increased traffic particularly on key cycle routes.

Potential Increases on Traffic Congestion

Although traffic growth will be curtailed to some degree during the peaks by existing congestion, daily traffic volumes on the Eastern Freeway could increase significantly over a 24 hour period. Additional traffic on the Eastern Freeway will lead to more traffic in Yarra and could encourage motorists to seek alternative routes using arterial and local roads as traffic conditions worsen.

Traffic growth throughout Yarra, particularly in those areas close to Hoddle Street and Alexandra Parade, will result in substantial impacts to access, amenity, safety and liveability in the municipality.

Streets that are anticipated to be impacted by NEL include:

- Brunswick Street (local road);
- Johnson Street;
- Nicholson Street;
- Smith Street (local road);
- Hoddle Street;
- Wellington Street (local road);
- Alexandra Parade;
- Johnson Street;
- Victoria Parade;
- Heidelberg Road;
- Nicholson Street Abbotsford (local road), and
- Gold Street (local road).

Council has reviewed the traffic modelling undertaken for the NEL project and provides the following comments.

The Peer Review in the EES notes that the modelling has been undertaken to a satisfactory level. However, no raw survey data has been provided and no independent check of the raw survey data has been undertaken. In addition, no review of the forecast modelling has been undertaken.

Section 6.34 of the EES notes that the Eastern Freeway is a highly utilised corridor, with peak hour congestion affecting many sections, especially at its western terminus at the Alexandra Parade/Hoddle St freeway exit due to the freeway abruptly terminating at an arterial road. The EES acknowledges that the section of Freeway between Chandler Highway and Hoddle Street has the lowest average vehicle speed of all freeways in Melbourne (this can be clearly seen in Fig 6-35 on page 114). The EES then goes on to state that volumes in this area are anticipated to increase however these are not significant and would be within day-to-day fluctuations.

The micro simulation modelling does not include the intersection of Hoddle Street/Eastern Freeway. It is critical that this intersection and other intersections along Hoddle Street and Victoria Street used by the DART services are modelled in detail to understand the potential impact of increased DART services in Yarra and what this means.

A spreadsheet model is used to convert 'partially constrained' strategic modelling demand to constrained traffic demand by shifting excess demand evenly to either side of the peak periods. The shortfall in this approach is that it assumes traffic on oversaturated routes will not reroute to an alternative route. Council is concerned that this rerouting will result in undesired and unintended consequences that will have impacts on the community in Yarra and people travelling by public transport, walking and cycling.

The EES sets out that an existing year assessment has not been undertaken as the 2026 road network performance will be primarily driven by population and employment growth between 2016 and 2036. The lack of an existing conditions assessment means that congestion hotspots are not identified and assessed.

The strategic modelling uses the VLC Zenith model, 2016 and 2036 models. These models consider population and employment growth specified by the State Government forecasts and transport infrastructure improvements committed to by the State Government. The Zenith Model have also been used to assess other State Government projects including Melbourne Metro and the Citylink – Tulla widening. Council notes that the strategic modelling does not really account for differing scenarios in growth and transport infrastructure improvements. Given the challenges associated with forecasting and amount of associated guess work it is disappointing to see that scenario testing has not been undertaken to understand impacts using a range.

Section 8.1.2 of the EES Transport outlines the committed transport projects that will be completed by 2036 which are:

- Metro Tunnel;
- Mernda Rail Extension;
- Hurstbridge Stage 2 upgrades;
- West Gate Tunnel;
- M80 Ring Road upgrades;
- CityLink-Tulla Widening;
- Chandler Highway upgrades;
- Northern, South-Eastern and Western Road Upgrades; and
- Monash Freeway Widening.

Council notes that East West Link is not included and questions the basis for this. East West Link is a high profile project with a Federal budget allocation which could have significant strategic impacts on NEL and particularly traffic volumes on the Eastern Freeway which forms part of the NEL study area.

Council also questions the assumption underlying the conclusions that "North East Link would marginally reduce emissions due to heavy vehicles using North East Link instead of local roads" (Chapter 26, p12). This will not be true for the City of Yarra with a substantial increase in heavy vehicles and other vehicles exiting the Eastern Freeway into Yarra.

Ensuring that the cycle improvements proposed as part of NEL consider broader cycle network interfaces

New shared user paths are proposed as part of NEL to complete missing links along the Eastern Freeway. The new paths will significantly increase the number of cyclists travelling through Yarra to access the CBD from the north eastern suburbs. Complimentary improvements will be required along a number of Yarra's key cycling routes to provide continuous, safe and attractive connections particularly to the Hoddle Grid and the northern central city area.

Streets that will require bicycle upgrades as a result of the NEL cycle trials include:

- Wellington Street (north of Johnson Street);
- Roseneath Street;
- South Terrace;
- Trenerry Crescent, and
- Gipps Street.

The NEL scope of works includes the provision of a busway on the Eastern Freeway. In order to fully utilise this infrastructure it will most likely be necessary by the State Government to improve the bus operating environment between the Eastern freeway and the CBD. This may mean deployment of full time bus lanes in Yarra and other infrastructure that allows buses to move quickly and reliably. Depending on service frequency it may be necessary to have two high quality bus corridors through Yarra on the following streets:

- Hoddle Street;
- Victoria Parade;
- Johnson Street;
- Alexandra Parade;
- Wellington Street;
- Nicholson Street; and
- Lygon Street.

This may also require changes to some key intersections which require careful assessment insofar as public realm, amenity and other likely impacts. The ESS in Section 9.6.6 discusses DART services and notes bus travel times along the Eastern Freeway will improve by 20-30% with the project. It also notes that travel times along no-freeway segments (i.e. the inner city and eastern suburbs) are forecast to improve by up to 15%. However, no detail is provided on where or how the non-freeway improvements will be realised is provided.

Council is especially concerned about exacerbating congestion on Alexandra Parade without any provision for public transport along the length of Alexandra Parade from the end of the Eastern Freeway notwithstanding the current 65,000-70,000 vehicles per day using Alexandra Parade. This is a similar volume to the number of vehicles using Hoddle Street; yet this is served by frequent smart bus services as well as a rail line parallel to Hoddle Street. The major gap in east west public transport along Alexandra Parade needs urgent rectification. This is particularly so, given that Alexandra Parade serves access to the Carlton/Parkville National Employment and Economic Cluster (NEIC), northern access to the CBD, and Melbourne's west.

Strategic Outcomes

Council has identified the strategic guiding outcomes that it wants to see delivered as part of this project to inform the design development and help manage impacts. The outcomes have been developed to consider the objectives of the Transport Integration Act which came into effect on 1st July 2010 and is Victoria's principal transport statute and replaced major parts of the Transport Act 1983. The Act requires that all decisions affecting the transport system be made within the same integrated decision-making framework and support the same objectives.

Council believe that the following TIA objectives should be noted as being of particular relevance to this project:

10 *Environmental sustainability*

The transport system should actively contribute to environmental sustainability by—

- (a) protecting, conserving and improving the natural environment;
- (b) avoiding, minimising and offsetting harm to the local and global environment, including through transport-related emissions and pollutants and the loss of biodiversity;
- (c) promoting forms of transport and the use of forms of energy and transport technologies which have the least impact on the natural environment and reduce the overall contribution of transport-related greenhouse gas emissions;
- (d) improving the environmental performance of all forms of transport and the forms of energy used in transport;
- (e) preparing for and adapting to the challenges presented by climate change.

11 *Integration of transport and land use*

- (2) Without limiting the generality of subsection (1), transport and land use should be effectively integrated so as to improve accessibility and transport efficiency with a focus on—
 - (c) reducing the need for private motor vehicle transport and the extent of travel;
 - (d) facilitating better access to, and greater mobility within, local communities.

13 *Safety and health and wellbeing*

- (1) The transport system should be safe and support health and wellbeing.
- (2) Without limiting the generality of subsection (1), the transport system should—
 - (a) seek to continually improve the safety performance of the transport system through—
 - (i) safe transport infrastructure;
 - (ii) safe forms of transport;
 - (iii) safe transport system user behaviour;
 - (b) avoid and minimise the risk of harm to persons arising from the transport system;
 - (c) promote forms of transport and the use of forms of energy which have the greatest benefit for, and least negative impact on, health and wellbeing.

The five strategic outcomes that Council wishes to see from this project are outlined below:

(a) *Encouraging People to Use Public Transport*

- (i) The design of the Doncaster Busway must not significantly preclude the construction of Doncaster rail in the future;
- (ii) Yarra requires that a bus operational plan is developed to complement the delivery of the physical busway and ensure that public transport and other environmental benefits promised by the project are fully delivered. This operational plan should include:
 - Minimum busway headway provision for peak and off peak periods including weekends;
 - Commitments to responding to growing passenger demand and ensuring that there is sufficient capacity to allow passengers to always be able to board a bus and travel in comfort;
 - Commitments to continually providing attractive journey times by bus and improving bus priority outside the Eastern Freeway where necessary to ensure that the service operates satisfactorily, and
 - Commitments to the rollout of e-buses on the Busway with a view to having a fully electrified fleet on this route.
 - An assessment of how the busway proposals perform in the context of international bus rapid transport (BRT) best practice standards. Yarra argues that the busway should meet the BRT gold standard.
- (iii) Yarra should be consulted regarding route options for Doncaster bus services between the Eastern Freeway and the CBD. Yarra requests that mitigation measures be developed by the State Government in response to businesses impacted by removal of car parking on any upgraded bus corridors. Yarra also requires compensation for the Project's removal of any paid parking bays to deliver bus corridor upgrades.

(b) *Encouraging People to Cycle*

- (i) All new shared use paths delivered by NEL should be a minimum of 3m in width. All facilities must be signed off by Council and be in accordance with the State Government's Design Guidance for Strategically Important Cycling Corridors and other relevant policies and standards;
- (ii) NEL should be required to pay for all ongoing maintenance associated with new cycle paths provided as part of this project.
- (iii) NEL should make provision for cyclists accessing the CBD from the project study area via key cycle routes in Yarra.

(c) *Encouraging People to Walk*

- (i) Better opportunities should be provided for pedestrians and cyclists to cross major roads connecting with the NEL project area such as the Eastern Freeway, Alexandra Parade and Hoddle Street.

- (ii) The ability to extend pedestrian crossing times in the future on Alexandra Parade and Hoddle Street should not be refused due to delays caused to additional traffic as a result of NEL;
- (d) *Preserving Open Space and Amenity*
 - (i) Tree removal should be minimised; and the existing tree canopy should be replaced as a minimum through offsets at nearby locations
 - (ii) NEL should not result in any net loss of useable open space in Yarra and the quality of existing open space should not be compromised to deliver the works;
 - (iii) Any proposals to extend the hours or length of Clearways to deliver bus improvements must only be considered after complying with the associated legal procedures and industry agreements;
 - (iv) Any proposals to remove on-street parking should directly improve travel conditions for people travelling by non-motorised transport modes;
- (e) *Managing Traffic Impacts*
 - (i) NEL should not result in additional traffic growth or through traffic on local roads or through key centres. Any additional traffic growth should be offset through funding to improve public transport, walking and cycling;
 - (ii) NEL should implement a rigorous post construction monitoring framework to quantify changes in traffic flow. This will measure changes in traffic volume, public transport delay and other impacts as a result of the project. A funding allocation should be provided by NEL to deliver works as needed in response to monitoring outputs.
 - (iii) Traffic associated with NEL should not be used to support a future business case for East West Link.

Council may wish to present to the Panel Hearings in relation to this matter and in this case will expand on these, and other points of concern during the hearings process.