

SUBMISSION

I make this submission on the grounds that the project proposal to build this road is fundamentally flawed from its initial concept and with no substantive business case to detract from the lasting adverse impacts to the State and to the local communities, that it should certainly never be built.

I submit that the funds should be immediately directed to other important public transport projects such as the signaling system, and that the gazetted envelope be rescinded forthwith.

I attest that the reference design was construed without consideration of all the impacts: it has been defined improperly in Kensington, and is as a result gazetted in the wrong envelope entirely. Entire communities have been ignored in the CIS, and impacts to those communities are untested, undocumented and unacknowledged when they should form fundamental inputs into the assumptions.

Had they been properly considered, the project would have undoubtedly planned to drive the road through the already empty corridors that could mitigate all of this. The CIS is incomplete and improperly made from inception; it has been hastily cobbled together from siloed information, and is not fit to be relied upon to support execution of this project.

The LMA has not complied with the scoping directions in a number of demonstrable ways. For example there are no side elevations or other of the required documents that show what this would really look like, many metres above the CityLink road, with rollercoaster features that would impact even more badly than suggested by the underdeveloped information provided.

I submit that this project has been rushed to approval as a *fait accompli*, with very poor consideration of business benefits as well as design. All the later stages of the proposed road were hidden from the community until very recently, including the City of Melbourne and Yarra Councils, who were unpleasantly shocked to find their well developed and consulted local strategies were to be rudely overthrown. The project boundary itself is constrained to the detriment of the outcome. Heritage places will be destroyed when there is no need.

I require that the real business case be made immediately available so that this sham process can be seen for what it is. That we have arrived at a place where we have to review the Impact Statement when there is no true reason for the project to even exist, is appalling. I believe the Assessment Committee is being asked to assess a shadow.

Reference	TOR	Submission
All document	(a) traffic, (b) impacts on land use and infrastructure not properly addressed, or (f) waters and (g) native vegetation and (e) heritage values	MISSING ASSESSMENT of BRUCE ST HOMES The complete excision of our community means that the impacts of future traffic increases in Bruce, Elizabeth, Barrett and the Mill precinct have not been assessed properly. This is a condition precedent of a properly researched CIS and would have surfaced many issues not identified in that limited desktop study. Assessment is required.

		<p>MISSING TRAFFIC ASSESSMENT</p> <p>There are important traffic management needs associated with Allied Mills and the local mill community which have not been considered. Traffic management mitigation must be undertaken.</p> <p>MISSING RESIDENTIAL AND HERITAGE ASSESSMENT</p> <p>There are impacts to Bruce Street, where there are 8 residential houses, some heritage-listed, which have not been considered. The entire end of the street will be lost and traffic flows irretrievably impacted. However no impact assessment has been made on this community, metres from the proposed road and ramps. Social impacts must be assessed.</p> <p>LOSS OF OPEN SPACE AND CREEK</p> <p>Impacts to open space and the creek are unacceptable in their inherent nature and also their deep incongruence with the C190 strategy proposed for this area. The best outcome for this community would be for the road to be located on the east of the creek. This would preserve the creek. It would preserve the attendant parkland plans. It would preserve the C190 strategy in an area with the lowest public open space in the city. It would change the traffic and noise impacts. It would use dead land. The creek and open space impacts must not be permitted.</p> <p>OVERALL LOSS OF REMNANT HERITAGE PRECINCT</p> <p>If C190 were upheld and this road dismissed as it should be, or moved to the east, this would enable restoration of the heritage Mill and theatre precinct, with the fabulous Younghusbands building a cornerstone of the area. It would in short be a far less impactful solution. If the reference design location persists (though how it can, I hardly see), the only palatable outcome for Bruce St is that it is closed at the City end and made a Local Traffic Only residential dead end street. It is critical that the parks and design strategies of C190 are put into place to protect the remnant heritage values and create the strategically agreed green spaces needed in the area.</p> <p>MISSING ASSESSMENT OF 1930's BUILDING</p>
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Chapter 1 page 9	Failure to comply with scoping directions	<p>NO ELEVATIONS AND PLANS AS PER SCOPING DIRECTION</p> <p>The LMA has not complied with the scoping directions and there are no side elevations or cross sections of the required documents that show what this would really look like, many metres above the CityLink road, with rollercoaster features that would impact even more badly than suggested by the underdeveloped information provided.</p> <p>It is not possible to assess the real visual and noise impacts with no elevations and cross sections. To suggest these can't be imagined in some way before tender is misleading. These are an unacceptable omission, and make the so-called impacts clearly limited in their clarity. How can communities assess the real impacts? How can the experts? A requirement for this road to proceed is that the scoping directions are fully complied with; ideally the road does in fact not proceed.</p>
Chapter 4 P5	(g) Impacts on biodiversity and (f) waters and (e) heritage	<p>PERMANENT LOSS OF CREEK</p> <p>I submit that in assessing the options, the fact that the impacts will be so severe and long-lasting, and that the communities, creek and parks so badly impacted, that the road should not go ahead. I require that we protect our scarce green assets and not trade them for a road.</p> <p>PERMANENT IMPACTS WITH NO MITIGANTS</p> <p>The arrogance of some of the statements in the CIS is astonishing. Suggestions that flora and fauna in remnant wetlands could simply "relocate" to other nearby areas is simply impossible. We have a precious and fragile city ecosystem, where links and habitat are crucial to the survival of their communities. These are far more important to maintain for future inheritors of our beautiful city than another road. Pushing Part B of the City Link section to the west, for example, where it will degrade the creek and its linear park for ever, is an option that is clearly not an option at all. It talks about the areas that it will reduce impacts on,</p>

		<p>but makes no balancing reference to the serious new impacts that arrive on scene as a result.</p> <p>FAILURE TO BALANCE IMPACTS AND THEIR IMPORTANCE</p> <p>The price of the environment can not be measured and once lost we cannot get it back. Future custodians of our city will be very pleased to inherit Royal Park and Moonee Ponds Creek. This road is short term and lacking in vision. I require that impacts on future custodians of Melbourne are considered with vision and integrity.</p> <p>SHORT TERM THINKING, CONFLICTS STRATEGY</p> <p>I require that there is no impact to the Moonee Ponds Creek as it is enjoyed by many including the residents of the heritage precincts on the west of the CityLink road near Arden Street.</p> <p>MISSING ASSESSMENT OF WHOLE HERITAGE COMMUNITY</p> <p>These heritage precincts in Bruce St were completely overlooked by the LMA and do not feature in the document. ("Oh we thought it was all Industrial there" LMA reps at their pathetic meeting. 11 Nov 2013). The project boundary itself is constrained to the detriment of the outcome, as to keep it on the west, heritage places there will be destroyed when there is no need. A complete and full assessment is a prerequisite to entering the next stage gate of this project, if it should proceed at all.</p> <p>FAILURE TO EVALUATE PROPERLY - HASTE A FEATURE</p> <p>I require that the actual benefits of the road be looked at in depth along with the actual impacts, which will show that we must certainly not treat our important parks and waterways and heritage places as <i>terra nullius</i> for conveniently building roads. The impact on Moonee Ponds creek in Precinct 5 can easily be remedied with an eastern design envelope, and I rebut suggestions that this cannot be considered. It certainly can be. The project envelope was rushed to print and is not properly made. I suggest that the Assessment Committee recommends that funds be immediately directed to other important public transport projects.</p>
Chapter 4 P4	(a) whether the impacts on traffic performance	QUESTIONABLE PRIORITIES

	have been properly addressed	<p>I submit that the project is not focusing on the part of the road that Sir Rod Eddington identified as a priority, so to rely of his name as some kind of proof point is something of a stretch. The so called benefits in Chapter 1 page 6 can be refuted.</p> <p>The decision to start work on the eastern end of the project is completely unsupported by actual need. Not only would rail serve the community much better in the longer term, and you can look at any city in the world to see where future strategy should actually lie, but Eddington himself identified that the greatest need in improved traffic performance was to provide an alternative river crossing to the West Gate Bridge. Not to cover over Royal Park and the Moonee Ponds Creek with a huge concrete folly. The strategic impacts of building the road at all are not supported by strategically assessed traffic requirements for the city, including the preferred priority to upgrade the signaling system.</p> <p>QUESTIONABLE SUPPORT</p> <p>I require that the reasons for diverting our scarce public finds to a project with such dubious benefits are immediately scrutinized. I read in the egregious Herald Sun the other day that unions would “support any project at all as long as it created jobs”. If this is the kind of rationale behind the project then we may as well commence a tower to the moon immediately. I request that the Assessment Committee looks deeply into the rationale behind this proposal and dismiss it forthwith.</p>
Chapter 4 page 7	(a) traffic, (b) impacts on land use and infrastructure not properly addressed, or (f) waters and (g) native vegetation and (e) heritage values	<p>SERIOUS LIMITATIONS IN DESIGN ASSUMPTIONS</p> <p>I submit that to treat CityLink as a separate structure that cannot be expanded upon is a ridiculous limitation. The fact we have built toll roads with private operators and now cannot progress other projects using those structures and linears, is madness. The simplest option to increasing any road capacity in the CityLink area is surely to increase the actual capacity of the existing road. Another option used in major cities all over the world is to stack the roads using flyovers, reducing the ground level construction and environmental impacts, though increasing visual impacts, certainly. Where were these options assessed? Connectivity for pedestrians and cyclists will be impeded by the environment created by flyovers. Visual impacts will be enormous. I submit that impacts have not been properly</p>

		<p>assessed.</p> <p>COST IS NOT ALL ABOUT MONEY</p> <p>I submit that money is not the most important factor in projects such as these. We need to be looking at our fragile ecosystems and protect our scarce heritage pockets like Bent St, before we save money blundering though them for a few more lanes of freeway.</p> <p>CREEK TO DIE – QUOTE, LMA ECOLOGY REP, Town Hall</p> <p>LMA laughably claims the project will leave Moonee Ponds Creek looking "more natural". When we spoke in person to their rep they said the creek and plants would all die under the road. The use of the creek as a building corridor is not acceptable, especially when to the east there is a wide vacant transport corridor. I require that the creek and mill community are protected for the future and that the C190 strategy is upheld.</p> <p>REFERENCE ENVELOPE INCORRECTLY SITED</p> <p>The creek is likely to have a two-and-a-half- kilometre, four-lane elevated road built along its western bank, running parallel to CityLink, as part of stage two of the project, forcing 13 homes and 12 commercial properties to make way, overshadowing the creek itself, ruining its ecosystem, and trashing the creek's linear reserve. The impacts on residences and businesses which will face flyovers and new freeway routes, with greatly reduced amenity and without compensation, have not been addressed. I submit that impacts that balance all aspects have not been properly assessed.</p> <p>INCONSISTENT AND DUBIOUS ENVIRONMENT CLAIMS</p> <p>The Linking Melbourne Authority claims in a video posted on YouTube that the creek's environment will be improved . How the fish and birds and row of mature native trees that lines the western bank can be improved when replaced by a gloomy concrete viaduct that mirrors CityLink on the eastern bank, is hard to imagine.</p> <p>The creek is fragile and man has made it more so, however it</p>
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		<p>has been rehabilitated in recent years, from a paved drain into a green space filled with nesting birdlife (plovers, swans, cormorants amongst the species) and frequented by walkers.</p> <p>The road could go on the eastern side with a very simple design mitigating the so-called reasons up the front of the document. If the Assessment Committee does not know what this is, let them call us. This would save the creek and the communities, impacting practically nothing on the other side.</p> <p>I submit that the options for this road have been poorly assessed, as has the need for the road itself over the other projects on the slate.</p>
Chapter 4 page 8	(b) impacts on land use and infrastructure, (f) waters and (g) native vegetation	<p>LACK OF TRANSPARENCY OR LISTENING TO EXPERTS</p> <p>I submit that the public should be able to review and comment on the reference project variations and that this project is proceeding with indecent haste and undue opacity.</p> <p>I challenge the reference design and the whole project boundary as being unsuitable for the project to proceed. The major and severe permanent impacts on Melbourne are not commensurate with the actual benefits of building the road.</p> <p>CLASH WITH GLOBAL AND LOCAL STRATEGY</p> <p>Moreover, no city in the world is choosing road transport as its future strategy. The whole concept is preposterous and a massive waste of public funds. We cannot impact Royal Park, for a start. That we could even think of such a thing is appalling and I submit that the Assessment Committee should reject the entire proposal as unbalanced in favour of concrete built structures and transport over our scarce and precious grass, trees, fields and creeks. These land uses are critical and long lasting for people. Roads more important than our waterways and parks? Not so.</p> <p>I require that the professors with expertise are listened to, and not ignored in the determination to build regardless.</p>
Chapter 4 page 9	(c) imagined mitigant of the Urban Design Framework	<p>MISLEADING IMPACTS OF NON CONFORMANCE</p> <p>I submit that the statement that the conforming bid requires</p>

		<p>a properly constructed tunnel through Royal Park is completely misleading. This is because tenderers are allowed to submit non conforming bids. We know that in balancing quality over cost in this dreadful project, cost will come out on top as the driver. So we can infer that a cheaper non - conforming bid will certainly get the gig, despite having much higher impacts that are conveniently under-baked in the CIS.</p> <p>NO TEETH IN URBAN DESIGN STRATEGY</p> <p>I require that if this project were to misguidedly go ahead, that principles be put in place such that quality is set as a project barometer, not cost, so that we end up with the lowest possible permanent impact on Melbourne. I submit that this will undoubtedly require changes to the reference design currently on the table, and that as such the Assessment Committee should not find the project viable in its current form. There are no design aspects in the CIS that go any way to ameliorating the road.</p> <p>EVIDENCE OF PREVIOUS ROADS</p> <p>Look at CityLink – the area near us is the ugliest thing you ever saw. Now, go and read the lovely sweet warm documents that told us how green and well-made it was to be. Not here! I do not buy into the window-dressing that the UDF is a panacea for all the concrete. It is too much of a stretch to believe it will “appropriately manage impacts”. There is no evidence at all that it will be executed in full and to the required standards. Plus, entire communities have not been considered when construing the ideas. How do you make an architecturally beautiful ecosystem out of an offramp? When you can tell me that, I may find the idea of a UDF a sufficient mitigant.</p>
Chapter 4 page 11	General impacts	<p>INSUFFICIENT ACTUAL IMPACT ANALYSIS</p> <p>I submit that there has been no consideration given to how practically this road build may be achieved. For all I know, the operations centre that “could be located somewhere within the project boundary” could be next door to my house. How can they possibly determine that the impact statement is full and complete if there is no clue as to where the major operations centre, may be located. As the LMA have said they did not take our whole community into account, they certainly have not considered the horrible facts as they affect all our neighbours here.</p>

		<p>I require that the location of the operations centre and all the attendant impacts of that are finalized in the impact statement. Until then this road has no practical means of being built and run.</p> <p>I submit that the impact statement, far from being comprehensive, contains a large amount of repetition and padding, surrounded by few facts. It is incomplete, inaccurate and makes the self-serving assumption that the road will go ahead regardless. I demand that this road is not built unless the benefits and full impacts are deemed to balance each other. At the present time, this clearly is not so and I cannot imagine how the Committee can find it so.</p>
Chapter 4 page 11	(a) Traffic impacts not assessed and (b) impacts on houses, recreation and community	<p>WEAK DEVELOPMENT OF ARDEN ST RAMP CONCEPT</p> <p>The design speed limits are very broad brush and give no consideration to the on ramp and off ramp interchanges. To suggest that it will be appropriate for B Double trucks to hurtle around in the Arden Street area is absolutely unacceptable. There are local residential streets, train crossings, a bridge over the creek, local people on foot and on bicycles seeking to access the Capital City Trail for recreation or commuting to work. This is not a place where an off ramp should be situated. I require that the writers of any CIS should actually visit the places they write about, and get out of their armchairs, then they could see immediately that this is not a place where a concentration of industrial traffic should be pushed through at 80kph.</p> <p>IMPACTS TO HERITAGE MILL PRECINCT and OPEN SPACE</p> <p>I submit that there has been no consideration given to impacts to the remnant heritage mill precinct in Kensington. This beautiful and unique place benefits from the magnificent Younghusbands arts and theatre complex, contains a number of significant heritage places and homes and is bounded by lovely Victorian streetscapes on one side, the heritage and new silos on another, and the Moonee Ponds creek linear park on another. To kill off this community and turn it into a rat-run, a truck stop, a stinking truck onramp and a massive traffic impost on small local roads (which is completely unassessed by this so-called comprehensive assessment) is an outrage. I require protection of what was to be the open space and arts precinct of Kensington.</p>

		<p>FAILURE TO ASSESS TRAFFIC ON KENSINGTON ROADS</p> <p>I submit that the actual impact of high speed traffic on local roads like Bruce and Elizabeth and Arden Streets has not been addressed in this impact statement and as such the project should be immediately halted.</p>
Chapter 4 page 13	Broad impacts of (a) traffic, (b) land use and on housing that they have not considered including (e) heritage places	<p>DISREGARD FOR LOCAL STRATEGY AND COUNCIL VIEWS</p> <p>There is no mention of the interchanges at Arden Street which impact the carefully designed City of Melbourne C190 strategy for the region, and which bring huge amounts of truck and other traffic on to Arden Street and other local roads. That Arden Street was not going to be strategically suited for such traffic, and that the local strategies in C190 specifically avoided such impacts, has been completely ignored by the LMA.</p> <p>FAILURE TO MODEL RAMPS AS PER SCOPING DIRECTION</p> <p>They, on 11 November, told us at their little community meeting, that they had not considered or modeled any impacts of the ramps. In an email from them on the same day some other LMA lackey said that they had done so. It would be great if the facts were known as they are certainly not in the CIS.</p> <p>GLARING GAPS IN ASSUMPTIONS</p> <p>There has been no attempt to model the impact of the Arden Street off ramps with any level of reality. I would be astonished if the map-drawers of the LMA had even been to the area, and I know they had not been to our area as they admitted they did not know a community was here. There are small residential streets, one-way systems and a need for sensitivity in relation to the Mill traffic. None of this has been addressed anywhere in the CIS. How can a plan be made with a whole community ignored?</p> <p>WEAK BENEFITS</p> <p>I submit that the CIS is inadequate and that it does not contain enough information about the true impacts of the project. Moreover, the impacts even as stated, which are now comprehensive, completely overshadow the weak benefits of building the road.</p>

		<p>This project is ill conceived and is not at a point where it should be given public funding. Priorities lie elsewhere for well-thought through and properly consulted initiatives, which this is certainly not.</p>
Chapter 4 page 14	(c) urban design	<p>VISUAL EYESORES OF OTHER ROADS, NOT AMENITY</p> <p>The supposition that some weak and general statements about visual amenity are sufficient to protect Melbourne from an ugly, loud and intrusive structure is simply preposterous. I invite the Assessment Committee to view the ugly CityLink structure in the Kensington area and search for its quality urban design outcomes. This project was built in exactly the same way as the EWL and I know it mouthed the same platitudes about urban amenity, calmed local traffic flow and noise quality.</p> <p>LACK OF ACCOUNTABILITY IN ACHIEVING GOOD OUTCOME</p> <p>I urge the Assessment Committee to require specific, measurable and unimpeachable standards of urban design, local traffic outcomes and noise standards. I challenge you to tell me that the noise levels of the current CityLink meet the Standard. How we are mean to believe that the new road will be constructed properly, beggars belief. I require that specific standards are set as firm mandatory requirements for the road, should it unfortunately proceed. I require that world class architectural standard design outcomes are specific ally designed in, in a transparent way, and that they are set in stone as conditions precedent of the road construction.</p> <p>INCOMPLETE REQUIREMENTS ASSESSMENT</p> <p>I require that local traffic impacts are thoroughly modeled and consulted with the communities that are directly impacted, and that agreed road closures, one way systems, dead end streets, landscaping, signage and other factors are completely agreed before construction commences and not laid down as some kind of afterthought when funding has run out. I require that noise modeling is properly conducted – there has been zero modeling undertaken on the Arden St ramps, in this impact statement. This is unacceptable and the project clearly should not go ahead given the criminal negligence in assessing the impacts of the proposal properly.</p> <p>I require that this project is halted forthwith and I urge the Assessment Committee to treat the gaps in the CIS as material</p>

		and insurmountable for any immediate planning to be approved.
Chapter 4 page 14	c) urban design	<p>ACCOUNTABILITY REPOINTING</p> <p>The lovely mellifluous sentences describing the utopian outcomes aligned with the Urban design Framework are in themselves a work of art. There is no evidence that the dot points on this page or those repeated again in Table 4-2 are going to be achieved at all. We are told “oh this will be later in the tenderer’s design”. I do not believe this to be true and the fact that non-conforming tenders are permitted leaves us open to any kind of random interpretation. We cannot rely on this impact statement.</p> <p>In every meeting I went to, there was someone else that each expert pointed to. In the end I pointed out myself that no-one anywhere was willing to be accountable for anything.</p>
Chapter 4 page 20	General impacts	<p>PRACTICAL LOGISTICS NOT ASSESSED</p> <p>Parking for contractors. There are some general suggestions here but no real assurance as to how a workforce of some 3000 people could be prevented from overrunning local communities as they suffer five years of torment during the build. For those of us who are older, quality time is especially important. This assessment needs to explicitly describe how this impact will be ameliorated, not make some mealy-mouthed statements about arrangements that may be considered. What exactly is the plan? How will it be enforced?</p> <p>I submit that this impact of a 3000-strong workforce arriving each day for five years has not been properly assessed and as such this impact statement is far from comprehensive. I urge the assessors not to approve this project proceeding in its current form, as it will be of serious detriment to people trying to live their lives like everyone else.</p>
Chapter 4 page 21	Broad impacts of (a) traffic, (b) Poor land use choices, housing recreation and community that they have not considered including (e) heritage places	<p>LAND USE CHOICES THAT ARE UNDERSCOPE</p> <p>The brutal design that forces the road over on to the west side of the Moonee Ponds Creek is so impactful that it is hard to understand how it can be contemplated. There are suggestions the creek itself may have to be moved or modified which I leave environmental experts to consider the multiple adverse impacts of, including contaminated clays as well as the water life that has managed to reestablish itself in</p>

	<p>And) (f) waters and (g) native vegetation</p>	<p>this badly maltreated and previously beautiful waterway. It is not for this generation to come in and continue the disgusting behaviours of the past. We are meant to be custodians of our parks and waterways. I refuse to be complicit as the LMA trashes the creeks and parks as convenient empty zones for concrete pre cast pylons to be launched into.</p> <p>WEAKLY DEVELOPED CONCEPTS PUSHING ACCOUNTABILITY ON TO OTHERS</p> <p>Specifically what will this new Arden St bridge look like? Specifically where will it be? Specifically how will we get to the Capital City Trail to get to work on our bikes? Specifically what happens to the local traffic? Specifically how will you stop my residential street becoming a truck and car cut-through road?</p> <p>FAILURE TO SERVE VICTORIA and its FUTURE</p> <p>I submit that the impacts of this road have not been assessed and neither have the benefits. This does not serve me and my family, this does not serve our local community, this does not serve the wider communities of Melbourne and this certainly does not serve the greater good of the people of Victoria. The project boundary is constrained to the east and our fragile and precious heritage places will be destroyed when there is no need. This road is the last thing we should be doing, we don't know why we need it though there have been loud calls for the business case that apparently shows those benefits, and there are numerous hidden impacts this the CIS has not addressed. This project should not go ahead when there are other projects with immediate and apparent benefits and which do not require some kind of desperate hidden business case to justify.</p>
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Chapter 4 page 25	(g) native vegetation and (b) Poor land use choices, housing recreation and community	<p>IMPACTS TO ROYAL PARK UNJUSTIFIED</p> <p>In discussing acquisition of property I wonder how the project can justify forced acquisition of parts of Royal Park. A report prepared by the City of Melbourne in August 2013 estimated that the impact on Royal Park would be a 6% loss of parkland and loss of 5,200 trees. This is unacceptable. There is no benefit to this road. We need to stop reliance on the motor vehicle and fossil fuels, and start looking to the future. I value 5,200 trees in Royal Park over a longer time on the road for cars and trucks. So should we all. I demand that this is stopped immediately as the impacts are not in line with any benefits that have been stated so far. Money and economics are not more important than trees and open space. The supposition that this project has any kind of triple bottom line to it is frankly ludicrous. I require that we uphold Royal Park in its entirety and allow no more encroachments upon it. When the park was put in, an initial reserve of 6.25 km² was first short-sightedly reduced to 2.83 km² in the gold rush, showing the overwhelming greed of Man. Then excisions followed for the zoo, roads, trams, rail, schools, and three hospitals. When will this end? Who will be the first to show some integrity and leadership? Stop this project.</p>
Chapter 4 page 28	(b) Poor land use choices, impacts on housing recreation and community And) (f) waters and (g) native vegetation	<p>UNDER STATING REAL LAND USE IMPACTS</p> <p>I am most interested in the supposition that once the Moonee Ponds creek in the Arden precinct has been completely built over and the linear green areas overshadowed by giant concrete roadways, that this area is not “counted” as having been acquired as it can still be used.</p> <p>What for? Shall we look forward to graffitied dank underpasses and homeless people under the off ramps?</p> <p>Exactly what do you think this dark unpleasant area could be used for? A park where no grass or trees grow but which has high SunSmart qualities as no light penetrates there? Some of the assumptions of this impact statement are quite obtuse. I require that a very clear picture of what exactly the underneath of the roads could be used for is immediately provided. In the absence of this, I fail to see how we can know what the impact is of a six lane highway at the bottom of the garden. I submit that this is not a fully thought through assessment, in fact it is quite offensive to suggest any kind of quality land use under the freeways without explicitly showing how that could be so, and as such this project is only partially considered, severely flawed and should not proceed.</p>

		<p>OPEN SPACE IMPACTS ON WORST SERVED AREA IN KENSINGTON, against C190 STRATEGIC PLAN</p> <p>This area has been assessed by local Councils as having the greatest need to public open space. That this would be met by the dark smelly space under a rank anaerobic drain (which the creek would become) is appalling. The City of Melbourne's plans to build a linear park along the creek and rejuvenate its western bank were stalled earlier this year when the Linking Melbourne Authority called for the project to be put on hold while it finalised its own plans for an elevated road. The LMA claims it's nicely aligned with the C190 plan. It lies.</p> <p>If you look at the plans, all of that vegetated space will go, and we'll end up with a little dead area like we've got on the other side of the creek, which will be overshadowed and will just become a concrete drain. The Assessment Committee should not find this an acceptable outcome.</p>
Chapter 4 page 29	(b) Land use impacts and infrastructure	<p>TENDERS CALLED FOR BEFORE CIS ASSESSED</p> <p>The Victorian government will not be able to start this project on its hastily constructed timetable and the arrogance of forcing it through in this opaque and bullying manner is dictatorial and inconsiderate.</p> <p>We need to confront what is wrong in the world and multiply what is right. This road is wrong, it is a strategic furphy and should be righted by being roundly dismissed and replaced by the important infrastructure projects that the rest of Victoria needs, clearly being the rail signaling system as a high transport priority.</p>
Chapter 4 page 30	(a) traffic, (d) noise	<p>FAILURE TO MEET SCOPING DIRECTIONS</p> <p>The inclusion or excision of the Arden St ramps is a very unclear matter of scope. The ramps have not been reviewed at all in much of the document, yet they are required in the overall design and scoping compliance. I do not know how we can assess comprehensive impacts whilst conveniently deferring or ignoring key areas of impact.</p> <p>What are the noise and traffic impacts of the Arden St ramps? They are not in this document and there is no indication that</p>

		<p>the true impacts have been looked at. I submit that until all the impacts have been looked at, this project should not be funded. This CIS is a sham.</p> <p>LIES</p> <p>The LMA tells us (21 Nov, Doncaster), that the ramps will not go in for 30-40 years. Then, when reminded they are being tendered for now and are in the scoping directions, back off and say they could in fact be built now. They have not assessed them properly. Plus, if true, first they cannot make the strategy for our community simply be on hold for 30 years. Second it is in the scoping directions and not scoped properly. So, Poppycock. The LMA say that the ramps are not planned for 30 years and in other assertions they claim that Allied Mills will “probably” be shut (August 2013, our house) so they cannot assess road impacts yet. Where are they getting this rubbish?</p>
Chapter 4 page 32	(c) Land use, community	<p>MEALY MOUTHED PLATITUDES COVER REAL DAMAGE</p> <p>The supposition that “temporary and permanent relocation of sports fields would be managed...” is a meaningless statement of impact. In essence, that means the areas would be permanently lost to their local communities, reducing amenity there. Having to relocate somewhere else (where?) puts pressure on the other local amenities, and removes important places like Ross Straw Field. Putting in a statement that this would be “managed” is entirely meaningless. The fact is that this impact is irretrievable for the park. This is a terrible loss that should not be supported.</p>
Chapter 4 page 33	(b) Land use being wrongly assigned against better strategy, attendant impacts on housing, community, and (f) creek and (g) ecosystem and (e) heritage	<p>SIGNIFICANT ERRORS IN ASSESSING LAND USE</p> <p>The supposition that the western section is the best location for the new road is not at all strong. There are far more impacts to the environment and to existing local communities by doing it this way. There are many ways to design it so it does not do this, if you expand on the existing CityLink road infrastructure. This preserves the west, leaves the creek and green linear alone, allows the City of Melbourne Council’s C190 strategy to be upheld, and still have the same transport and linkage outcomes. Forcing the road through the west is a blunt instrument with no regard to community (which they MISSED SEEING) and the environment. There is a much better way to do it and the current reference design is poor. The project boundary itself is constrained to the detriment of the</p>

		<p>outcome. Heritage places will be destroyed when there is no need. It rudely disregards local council strategy and does not use the vacant land and empty warehousing to the east which was in fact the original plan. There are serious conflicts of interest at play here. I submit that the variations in design options and indeed transport options need to be released and assessed before this brute force design is applied to our city.</p>
Chapter 4 p34	(c) Performance measures and (i) EMF, as well as (c) UDF	<p>RISK IN STANDARDS BEING ACTUALLY UPHELD</p> <p>How will performance requirements be upheld? The current CityLink is already exceeding noise limits. Clearly whatever abatement regime is in place over the contract there, it is insufficiently punitive to make anyone have to install sound barriers. Additionally, there is zero 'high design standard' evident in the area – there are concrete pillars and bare roadways.</p> <p>FAILURE TO EVALUATE REAL RISKS</p> <p>Where is this risk (of not meeting any of the so-called standards) addressed and controlled? I do not trust this "flexibility in the project delivery". This leaves them flexible to build another bare unadorned roadway with no architectural values or sound treatments, and we are left with nothing. Plus we have no contractual power to force the outcomes that were expected. I require a full risk assessment.</p> <p>As the commercial arrangements are proven to be poorly executed in past projects, and the design outcomes regrettable, how can an Assessment Committee determine that this project should proceed? The risks are incompletely assessed.</p> <p>FAILURE TO ASSESS ACTUAL NATURE OF TRAFFIC</p> <p>We will end up with the same ugly and loud eyesores that we have today, except twice as loud, and twice as prevalent, as the roads are designed to take loads of trucks day and night from the port as well. The different nature and constant feed of the port traffic is completely undeveloped in this assessment.</p> <p>I submit that the impacts from this project are so extensive and so under-mitigated that he project should not be allowed to proceed.</p>

Chapter 5 p 3	(a) traffic	<p>INCORRECT ASSERTIONS ON LOCAL ROAD IMPACTS</p> <p>Less traffic on local roads. No. Not in the Arden St area. I suggest the writers of this document try a bit harder and stop making sweeping statements to fluff up the supposed benefits of the project. The Kensington area will be hard hit by much worse traffic.</p> <p>I submit that many of the statements in this CIS are so broadly painted as to be untrue. The actual impacts of the Arden St part of the project are appalling and include devastating impacts to local roads. Less traffic on local streets? Rubbish. Do not allow this proposal to proceed if it is relying on such over-generalised motherhood statements.</p>
Chapter 5 p5	c) imagined mitigant of the Urban Design Framework and actual impacts to real strategy that can now not go ahead	<p>OVER STATEMENT OF OPPORTUNITIES</p> <p>It is lovely that the project “could” create major new urban improvements but since these are stated to be not part of the project scope they are in fact a red herring. We should not be considering these statements in the terms of reference as they will most certainly not form part of the benefits. The impacts, however, are certain, is this project should inadvisedly proceed.</p>
Chapter 5 p 6	(b) impacts on community and land use, (c) design and (e) heritage places	<p>MISDIRECTION ON URBAN RENEWAL OPPORTUNITY</p> <p>How can a project come in and trash a complete community for five years, then leave it as a wasteland? I do not see how the impacts of the road can remove access to all local strategy and town planning from an entire community for five to ten years. So, the area could become high density housing, mixed use or open space. When we bought our 1897 house it was under the understanding that the C190 strategy developed by Melbourne City Council would be delivered. This added large areas of public open space and parkland to the area. We bought our place on that basis. Now what? You cannot just leave us without a strategy or plan. That is a dereliction of duty. To suggest the project brings new renewal opportunity is absolutely incorrect – what it does do is immediately remove the immediate actual and real imminent benefit we were just about to put in place.</p> <p>I submit that this project is careless of impacts to real people</p>

		<p>living real lives, and has not been thought through to mitigate all the actual impacts. There is a lot of theoretical chat about higher and better uses, but no specific funding, strategy or plan of action to get there. This is unacceptable.</p>
Chapter 5 p 7	<p>impacts on community and land use, (c) design and (e) heritage places</p>	<p>MISLEADING LIES ABOUT STRATEGIC ALIGNMENT</p> <p>The statement that this is broadly in line with the Arden Macaulay plan (referred to by me here as C190) is incorrect. This trashes C190 to the west of Moonee Ponds creek, as I note above, and was a nasty surprise to Council and residents. Plus there are lots of statements that with a red pen can be deleted as meaning nothing (“has the potential to”....). I have the potential to be Prime Minister. Is there a plan in place for this to occur? Not as such but I feel my credentials are shining. Let us not be fooled by such statements in this CIS.</p> <p>I submit that if I, a local resident with a full time job and no time to assess the four reams of paper it took for us to print this, can find such lies in this document, then goodness knows what a professional team of assessors can make of it. This project is a travesty from start to finish and should be scuppered as soon as possible so that impacts can be kept from our parks and communities.</p> <p>WHOLE COMMUNITIES IGNORED by LMA CIS</p> <p>As a specific example, our 1897 home is in an Industrial zone, and though I have clear unimpeachable existing use rights, with CityLink I am hit by a tiny afterthought of a clarification note by VicRoads which is that no noise treatments will be applied in Industrial zoned areas. So, this new road will be also built with no noise or visual treatments for me and my neighbours? Absolutely unacceptable. What protects us? Nothing.</p> <p>I submit that this project deliberately ignored entire sections of existing communities and tells lies about the “broadly consistent” alignment with the C190 strategy. It is directly conflicting with the strategy. The supposition that the Moonee Ponds creek corridor will benefit from a road being built on top of the creek itself is frankly offensive to our intelligence.</p> <p>I request that the project is immediately rejected by the Assessment committee.</p>

Chapter 5 page 7	All of the matters	<p>OVERSTATEMENT OF POSITIVE “POSSIBLES”</p> <p>Table 5-1 is pathetic. Let us examine it. It “could” improve public transport. I note the difference in “could” and “would”. I can think of ten thousand things that would immediately improve public transport, not this. It “could” create urban renewal. The C190 strategy “will” do this, if upheld. This CIS has already said that such urban renewal is OUT OF SCOPE. Yet it claims it as a pitiful environmental benefit. I am not fooled, LMA. Moving on to the next line – heritage. Rubbish. Next? Air quality. So, let me get this. A six lane freeway with truck traffic at the bottom of my garden will improve air quality in the region? You have to be kidding. Everyone knows that once a road has been built, there is a short reduction in congestion, followed immediately by a reversion to previous levels due to induced demand. This is NOT an environmental benefit of any lasting nature, certainly not one that supports this ignorant proposal. I reject this benefit as not being fact. Noise – there is the “potential” to reduce other noise on other roads. We all know this is not so. The LMA has made zero consideration of the terrible impacts of major truck routes thundering past our front door once this road goes in.</p> <p>The proposed EW Link will have detrimental impacts on Melbourne’s liveability and its future as a city based on sustainable public transport. These impacts have not been adequately addressed by the CIS.</p> <p>I can hardly bear to review the other statements in this table. How about “the project could remediate contaminated land in its boundary”. Great, so under the road we could be sure there was nothing. Not that any of us spend much time under a road. Oh, I forget, the new swamp darklands park. Lovely.</p>
Chapter 5 page 9	(a) traffic and transport	<p>TENUOUS BUSINESS CASE EXTENSIONS</p> <p>The weak link to improving things at the airport is laughable were it not so infuriating. Melbourne is an embarrassment with no rail link to the airport. To suggest that this project is any kind of solution to our airport problem is a stretch of the imagination.</p>
Chapter 5 page 10	(b) impacts on community, homes and land use, (c) design	<p>MAJOR GAPS IN IMPACT ASSESSMENT, LOCALS IGNORED</p> <p>Where are the permanent impacts to the people of Kensington who are going to live under a road with no noise</p>

	and (e) heritage places	<p>barriers due to their zoning? How can existing use rights be upheld when they are being roundly ignored? Where are the impacts caused by the Arden street ramps? Where are the impacts to local roads? Where are the impacts to local council strategy? Where are the impacts caused by the criminal waste of funds on this road when other projects have real and immediate benefits and are as yet unfunded? Leave our creeks, parks and communities alone and fix things that benefit everyone in the entire State of Victoria, like rail signaling. Stop pandering to egos and start looking for conflict of interest and corruption.</p> <p>This impact statement is incomplete and seeks to conveniently ignore many impacts. This project should not proceed and I urge the Committee to look at the real facts and the missing gaps in the CIS.</p>
Chapter 5 page 15	b/ impacts on community, homes and land use, (c) design and (e) heritage places	<p>MAJOR INFRASTRUCTURE IMPACTS UNDEREXPLORED</p> <p>SP AusNet’s power facilities may need to be relocated. Where? I have absolutely NO intention of living under a high power transmission line. The LMA cannot just blithely state “oh we will move that” without saying where to.</p> <p>NO IMPACT ASSESSMENT ON POWER LINE RELOCATION</p> <p>There are actual communities being affected here, and we seem to have no rights. We will end up living under high power lines, trucks hurtling past day and night, no noise barriers, no architecturally high values, and our homes will be ruined, every cent we earned in our lives devalued by having a house worth nothing, and lives taken from us. I feel sure that we are shit on LMA’s shoes, but impacting us is something the Committee surely must require they acknowledge and mitigate, and document in the CIS, not ignore.</p>
Chapter 5 page 15	(c) performance, and (d) noise and (a) traffic	<p>NO CONFIDENCE IN COMMERCIAL ARRANGEMENTS</p> <p>I don’t believe in performance requirements unless the abatement regime of the contract is so punitive that we can be sure they will be complied with. Normal practice is to negotiate some low figure, exceed all the measures, and pay the fine. Not acceptable.</p> <p>INCOMPLETE NOISE ASSESSMENT</p>

		<p>I spoke with Neil Huybreghts of Marshall Day. There has been no noise map made for the Arden street ramps. Marshall Day representatives have blithely told us that "oh we didn't model them as it would make no difference". I do not pay the government to make wild assumptions with no basis in fact. If, indeed, there would be no difference made, I expect to see the models and rationale that underpin that. I do not expect dismissal.</p> <p>FAILURE TO COMPLY WITH SCOPING DIRECTIONS AGAIN</p> <p>Clearly Marshall Day did not assess the reference design with any acknowledgement that our community is here. I submit that the placement of the reference design is not fit for purpose with respect to all the impacts, as it has not taken our community into account. I submit that to fail to model the Arden Street ramps is a major scope oversight, when there are going to be huge trucks accelerating up those ramps or applying their noisy air brakes down those ramps, day and night. When challenged, Neil told us that the "line on the map would probably move a bit" but it was good for us as we were "likely" in an area under the limit. However when challenged on current CityLink noise, there was a distinctly less forthcoming response. Does that fall into the "not invented here" category? Compounding noise from CityLink, the new road, and dare we mention the holographic ramps (now you see them, now you don't)... surely it is incumbent on the LMA to model ALL of this for ALL of us. We are dismayed to have to keep challenging these people on our rights. Our home has been there since 1897, we have existing use rights, and we will fight to the death to uphold those. Why we have to, I do not know.</p> <p>MISLEADING PUBLIC CAMPAIGN</p> <p>Apparently there will be no noise barriers in our area. The lovely computer model the LMA keep showing people, has them. This is criminally misleading. A couple of measurements (literally, two real measurements) and an extrapolation based on existing traffic, sounds well underbaked to me. I believe we could download a decibel app tonight and run a better assessment.</p>
Chapter 5	b/ impacts on	MISSING ASSESSMENT OF ENTIRE ZONE in KENSINGTON

page 33	community, homes and land use, (c) design and (e) heritage places, (d) noise, in fact everything	<p>Residential land is actually exceptionally close to the project boundary and it is clear that the LMA has completely failed to assess impacts to those residences.</p> <p>There are several houses (e.g the 1897 original carrier's residence for the heritage Mill) in the west of the proposed road which will be horribly adversely affected. Let us examine this.</p> <p>Our house has been there since 1897 before any such artifices as Zoning applied. As such we are entitled to, and herein claim in full, EXISTING USE RIGHTS. The same applies to other Victorian residences on Bruce and Elizabeth streets.</p> <p>CONFLICTING AND MISLEADING INFORMATION</p> <p>I refer you to noise abatement plans for this road. There is apparently no intention to provide noise treatments in areas on Industrial Zoning. However we are entitled to these treatments. How can such an oversight be permitted? We challenged this at the LMA show-and-tell sessions back in July, and half the people told us they would not do a thing for us, and the other half told us that they would. Which is correct?</p> <p>FAILURE TO MODEL IMPACTS OF ALL RESIDENCES</p> <p>I submit that the whole presence of our community has been completely overlooked by the LMA, which they themselves admit, and as such the road's impacts are not properly scoped. They have failed in their duty to properly assess the reference design according to the scope and terms of reference.</p> <p>Whilst the need to abide by a noise limit applies to residences in conforming zones, we have Existing Use Rights and these need to be considered along with our neighbours'.</p> <p>Furthermore there are other home office residences in Bruce Street that have conforming rights and have not been considered in the analysis either.</p> <p>The CIS is not in a fit state to support this road proceeding.</p>
Chapter 5 page 34	b/ impacts on community, homes and land use, (c) design and	<p>WEAK HERITAGE ASSESSMENT</p> <p>The list of Heritage Places is incomplete. I refer you to the</p>

	(e) heritage places, (d) noise, in fact everything	<p>Arden Macaulay Heritage Review 2012 Statements of Significance and HO817 Kenealys houses, plus HO816 McCandlish House, both on Bruce Street. These houses are within a few tens of metres of where this road is proposed to go, plus massive intrusive off ramps for industrial truck traffic.</p> <p>FAILURE TO MAP NOISE OF ARDEN ONRAMPS</p> <p>We have no idea if these ramps will be noise barriered, but as LMA considers that ramps are >10yrs off, then this “apparently” was not in Marshall Day acoustics brief to assess. However these ramps are in scope for the Eastern section, are part of the reference project and form part of the scope which should have been comprehensively assessed. No-one has assessed the impacts of the road and off ramps in Kensington. No-one has assessed the road at all; with or without the actual off ramps they should have included and did not, on an entire section of the community. No-one has assessed the noise impacts of having ramps in Kensington at all. However the tenders are able to include these to be built even though no impacts have been assessed. How can this be right? There is no integrity here.</p> <p>I submit that LMA should have directed Marshall Day to assess the ramps for noise and other impacts, but did not do so. I submit they needed to look at traffic impacts on our community but pretended it did not exist. I submit that they should have assessed a complete and full list of the heritage places and they demonstrably did not do so. I submit that they needed to take into account existing use rights of homes in non-conforming zones and they did not do so. The Assessment Committee must find that the LMA has failed to complete a properly complete assessment and has based the whole reference design on an assumption that there is no residence on the west side, which is wrong.</p>
Chapter 5 page 34	b/ impacts on community, homes and land use, (c) design and (e) heritage places, (d) noise, in fact everything	<p>FAILURE TO CONSIDER LAND USE ON EAST AND WEST OF CREEK</p> <p>The list of land use is incomplete as a whole section of community in Kensington is not mentioned, namely the heritage places and home office residences in Bruce and Elizabeth Streets.</p> <p>FAILURE TO BRING A WELL ASSESSED REFERENCE DESIGN TO TENDER</p>

		<p>There are also thriving businesses and other 1930's buildings on this side. On the other side? Bare blocks, empty buildings, nothing. Room for a road, in fact.</p> <p>I submit this road assessment is fundamentally flawed, incomplete, misleading and hastily contrived.</p>
Chapter 5 page 35	b/ impacts on community, homes and land use, (a), traffic (c) design and (e) heritage places, (d) noise, in fact everything	<p>INCOMPLETE ASSESSMENT OF REAL and RELEVANT IMPACTS</p> <p>When mentioning residences in this precinct that are affected by noise from CityLink, they specifically confine the supposed impacts to Bent St. They do not include our community which is should be included by virtue of being "outside, but close to" the project boundary as defined in the table preamble, and certainly closer than some other places described in the table such as the bridge over the railway.</p> <p>Let me give you a clue as to if we are relevant. In a public meeting held by the City of Melbourne council, the following map was tabled.</p> <p>http://www.abc.net.au/news/2013-08-26/potential-traffic-issues-caused-by-the-east-west-link/4913108</p> <p>We live in the tiny community between the two large red arrows showing significant new traffic impacts and all the attendant noise, exhaust fumes, danger to people and children in what are in fact (despite so-called zones and maps) residential streets. I believe we have the right not to be ignored by comprehensive impact analyses on that basis. They have neglected to analyse the impacts on the local area, the one-way systems there (yes) and actual real life being lived by residents and businesses like the Mill which is still operating, and the well-loved theatre precinct.</p> <p>I submit that there has been insufficient attention given to all the actual impacts of this project and that there are some serious deficiencies in the completeness and accuracy of this somewhat oxymoronically named Comprehensive Impact Statement. This project is clearly being rushed through without any consideration for inconvenient truths.</p>
Chapter 7 page 6	(a) traffic	<p>PROBLEMS MOVED ELSEWHERE, NOT SOLVED</p> <p>The suggestion that rat-running will be solved by this road is refutable. A quick look at the new rat-runs that will be created in the Bent St, Elizabeth St, Fink St, Bruce St area for a start,</p>

		<p>will demonstrate that this simply moves the problem somewhere else. As we know from transport modeling all over the world that induced demand will kill off any decongestion benefits in a few years, the whole rationale for preferring road to rail solutions as long-term fixes for Melbourne's livability comes under scrutiny. There is not a city in the world prioritizing roads. This project is ill-planned and strategically off target. Plus it creates many of the impacts it is claiming elsewhere as benefits.</p>
Chapter 7 page 13	(a) traffic	<p>DESKTOP TRAFFIC AUDIT FAILS TO UNDERSTAND ROAD LAYOUT</p> <p>So, people with no idea of what the area looks like, sat in a distant office many km away and blithely manipulated statistical models until they came up with a palatable answer. And, because the whole thing was so rushed, important inputs to the modeling were missed, as they were not ready.</p> <p>LIMITED MODELLING WINDOW NOT REPRESENTATIVE OF REAL TRAFFIC IMPACT</p> <p>Also, the assessment only looked at traffic from 7am to 9am. I thought this project had a purpose to carry masses of trucks and port traffic? Do these trucks only go about their business in morning peak hour? No, they do not, they run day and night. The impacts would be terrible. Nowhere have these been acknowledged or assessed. I challenge that a severely scope-limited, desktop-based, rushed audit can have realized its aims of assessing the true impacts of this project. I do not see that by including a sentence saying "we have not done all the work" that this justifies not having done a full and proper assessment. The Assessment Committee should find that the LMA have indeed not done all the work necessary to justify the project.</p> <p>ONE WAY STREETS MEAN IMPACTS NOT UNDERSTOOD</p> <p>I spoke with Shaun Smedley on traffic. The impacts of noise and traffic have been assessed in a very limited way, such that the reference design location cannot possibly have taken into account all the factors. For example, the road and the traffic on it is one thing, but the very significant increase in Elizabeth Street traffic is quite another. This known outcome makes no mention of the impact on local residents, in what is already a carefully managed one way system (LMA had no idea)</p>

		<p>designed to normalise Mill traffic with sensitivity relating that traffic to the locals.</p> <p>Bashing 30% more traffic up that road will be serious. The one way system will have to be revisited. It has a purpose. The fact that one end of Bruce St will be closed off will be serious. We have to make it a dead end or we will be a huge traffic thoroughfare within days. Managing traffic harmoniously with the Mill is already something that is a fragile status (and the Mill drivers are very courteous). However this will be a different situation if port traffic is diverting through our quiet neighbourhood. I seek assurance from the Assessment Committee that they will not approve such a situation, given there has been zero assessment of this in the so-called CIS. The road is in completely the wrong envelope for the area and should be located in the pre-existing traffic corridor on the east of Moonee Ponds Creek.</p> <p>MILL TRAFFIC, RESIDENTIAL Sts, ONE-WAY SYSTEMS and RAMPS NOT MODELLED OR EVEN UNDERSTOOD</p> <p>Not only this, the ramps have not been modelled and the whole scope of the CIS is distinctly blurred. There can be no road without at least some assessment of local traffic management complexities. There is no acknowledgement that the detailed traffic management plan that would be needed around Allied Mills, has been given a thought. If the road is on the west, the impacts are impossible, and hit a well established section of the community on which the CIS is unaccountably silent. How can the tenderers on this road possibly come up with something palatable when the CIS does not mention half the impacts and businesses and communities? If they do not know there is a community there, and a Mill, and a one-way system, how will they be able to address potential impacts? If they did not think of this when putting together the reference design, how can the brutal forcing of the reference design through the west of CityLink, though the creek and existing houses, be justified? It was first on the east in the obvious traffic corridor, and there is a low cost way of returning it to that obvious linear. I urge the Assessment Committee to find that the assumptions have not all been considered and that the reference design is not fit for purpose.</p>
Chapter 7	(a) traffic	NO REAL RISK ASSESSMENT OR SITE VISITS

page 16		<p>I challenge the risk assessment. For example, there is supposedly an unlikely likelihood of local users having reduced connectivity. So, you will be closing the end of my street permanently. I have no idea where the Mill traffic will go. I have no idea how you intend to rehash our one way system. I have no idea how I will get to where I need to. I have no idea if our quiet street will become a thoroughfare for general traffic instead of the quiet place that it is. I fail to see how by hashing round with our one way system and acquiring and closing entire roads, that there will be an unlikely impact on connectivity. Not true, LMA. But then, as no-one has actually been here to do any analysis, you would not know, would you. The converse risk is not even contemplated, which is that streets that are for local traffic, become massive truck and car rat-runs. The risk assessment is not at all complete, and certainly understated in its impacts which cannot have been properly assessed given no-one has been to site. You cannot run this off a few maps in a back office in the suburbs.</p>
Chapter 7 page 34	(a) traffic	<p>WEAKLY STATED ROAD IMPACTS</p> <p>I do not believe that to construct the Arden St off ramps there are no other road impacts than those described in the table relating to Precinct 5. I know this is misleading, inaccurate and not a true picture of the local impacts. I have seen a map that proves this, and the link is in this very document. I submit that this CIS is a fabrication.</p>
Chapter 8 page 1	(f) and (g) environment	<p>NO REAL BENEFIT TO VICTORIA – ROYAL PARK FIRST</p> <p>I do not accept that impacting Royal Park is an acceptable balance to saving cars 20 minutes. Some things cannot be costed. When will we show some integrity and stop eating into our parks and communities.</p> <p>I submit that the value of an unsullied Royal Park is ten times the value of eight billion dollars of road. Leave the park alone, and work on the principle that human greed and convenience is not the leading factor in our lives, or at least, it should not be.</p>
Chapter 8 page 2	(b) homes	<p>HERITAGE HIT OVER EMPTY BLOCKS TO EAST – WHY?</p> <p>It's clear you have no idea that there is a community of heritage buildings to the west of CityLink in Kensington. We</p>

		are not a transport corridor. The east, it is.
Chapter 8 page 4	(c) land use	<p>ALIGNMENT WITH COUNCIL NOT TRUE</p> <p>The CIS blithely claims (Chapter 5 page 7) that it is in line with the Arden-Macaulay Plan. Here, however, we read what we knew all along, that the LMA has caused the plan to be deferred. This is because the benefits listed in the dot points thee are to be trashed by the road. So, not in line with the plan. If it was, then you would not have caused it to be held over. I submit that the road is in direct conflict to the strategic plan, it causes traffic to overrun Arden Street, it removed the Moonee Ponds creek park and other parks that were planned, it takes away a huge section of Kensington that was to be renewed, it leaves no future strategy, and it is a disaster.</p> <p>I submit that this road has no regard to local government and local strategy, and the so-called benefits are inflated and not commensurate with any kind of balance in attendant impacts. These impacts have not been fully or properly assessed. As a resident of Precinct 5 I can mostly only know my own area or well-known spots. If I, in the short time I have had to review this, if I can find so many anomalies and omissions in the P5 area, what of the other areas?</p>
Chapter 8 page 13	(b) land use, (f) water and g (trees)	<p>ARROGANT ASSUMPTIONS THAT ROYAL PARK IS EMPTY</p> <p>This road disregards the Royal Park Master Plan. It cannot possibly be consistent with the future of the park. We can never get this back once we break it. Can we please show our quality and prioritise what is important in life. These desk bound bureaucrats are the most depressing custodians on our future. I do not support this road.</p> <p>We surely do not need to have “significant” trees and important aboriginal artefacts lying about, to be able to justify that the Park should be protected for all future custodians, in full, and unimpacted.</p>
Chapter 8 page 18	b/ land use, homes, community, and (f) waterway and (g) greenery	<p>BRUTAL DISREGARD FOR STRATEGY, CLAIMS OTHERWISE</p> <p>The project would not broadly achieve the aim of making Precinct 5 a connected and accessible place. The project would not create highly improved infrastructure. The project does not promote sustainable transport. The project does not promote any efficiencies of freight movement in a way that</p>

		<p>works seamlessly with other uses of the area. The project does not “interface” with the Arden Macaulay plan – it trashes it. It builds right over the Moonee Ponds creek. It takes away an entire community. It stifles local strategy and planning. It does not integrate at all with the AM plan, despite claiming that it must do so. The two things are not at all complementary to each other. Unless the road was placed on the east of the CityLink, meshing with it on that side, impacts will be enormous.</p> <p>DESIGN IN THIS DOCUMENT, LEAST OPTIMAL</p> <p>There is actually a design that can achieve this. I submit that the design with the road on the west is completely unsuitable and that there is an eastern option that has not been assessed. I submit that there are probity issues and conflicts of interest at play, as there can be no other reason for the reference design to have moved to the west from where we know it was before. We are left with a project boundary that deliberately prevents other options being assessed and that assumes the road will simply go ahead. I will not be complicit with this lack of integrity in the planning process.</p>
Chapter 8 page 19		<p>PROCESS CORRUPTION AND PROBITY FAILURE</p> <p>How will this road fully consider our area’s future outlook and prospects as it claims? I am in Chapter 8 and I see nothing so far to indicate any concessions to people here. I submit that the CIS is full of meaningless platitudes and smooth comforting sentences with no substance, plan or commitment we can hold the LMA to. I submit that the tender process has been hastily entered into before the impacts have been assessed properly, and before the community has had a chance to review. I submit that the tenders are permitted to be non-confirming, weakening any protection that the community may have. I submit that we are exposed to rort and corruption. I submit that one of the consortium members is even proven as corrupt and yet here we are close to hiring them. This is not acceptable.</p>
Chapter 8 page 19 Chapter 16 page 25		<p>IMPACT TO BIKE PATHS AND SAFETY</p> <p>I get to work by bike. I do not want to have to ride in dangerous places. I require a safe way to get to work. I fail to see how any of us can negotiate the flyovers of our future street.</p>

Chapter 8 page 19		<p>OVERSTATE OPPORTUNITY, UNDERSTATE IMPACTS</p> <p>The construction site mentioned in the box on this page abuts where I live. The CIS claims not to affect the AM plan and yet mentions the various uses the construction site could be used for once finished with. Here is where I am with this. We hear “our” section may not be built for oh ten, 25 years, 30, 40 (the b/s varies). So, there will be no ability for any urban renewal to occur now whilst we are in limbo. No strategic plan can be enacted for our area any more. We are nothing. Then in ten years time we are a five year horror of construction, having the actual construction site on our very doorstep. The traffic impacts are unimaginable. I am depressed. Then, when I am an old lady, and there is a huge offramp in my garden, finally we may get a local park, the one that was promised in C190 and which was coming in 2014, now 2034.</p>
Chapter 8 page 21		<p>PROCESS FAILURE AND CONSULTATION A SHAM</p> <p>The LMA assumes this road will proceed and has arrogantly started to move people off Ross Straw field and purchasing EVO apartments. Are we to assume this whole assessment process is a sham and that the road will proceed regardless of comment? I trust not.</p>
Chapter 10 page 3		<p>MISSING ASSESSMENT</p> <p>Paragraph 1. No. wrong. Precinct 5 does not have that character and you have missed an entire heritage community.</p> <p>The CIS pretends.</p>
Chapter 10 page 8	b/ land use and (c)design and (f) water and (g) ecosystems	<p>FAILURE TO UNDERSTAND LOCAL CREEK AREA</p> <p>We do not want the Moonee Ponds creek repurposed as an “urban waterway and movement corridor”. How crass.</p> <p>I spoke with Allan Wyatt on Urban Design. He attested that the Moonee Ponds Creek would certainly die under the road. The only solution to ruining this waterway is to have a concreted environment like a skate park or a wetland of pools of water. If the best urban design outcome for the creek it to turn it into a dead concrete bog, I am disappointed. There are swans, plovers, fishes (people fish there), ducks and all sorts</p>

		<p>of native creatures. We hear nothing of how trashing this creek can be mitigated in any meaningful way. We hear even less about how the visual impacts of the road could be ameliorated. And as most of the maps do not even show the on and off ramps, we certainly can not see how those could be integrated into a beautiful and improved-looking environment. If I have to have a road, I want vertical gardens and beautiful architecture. I want the road to be away from the creek on the east side. I want the creek to have the linear park put in, as C190 proposed. I want C190 to be upheld on the west of the creek where people already live (compare the east where they do not). I want the ramps to be over near the train terminal and not near the residential area. I want a properly thought through reference design with real urban design outcomes designed in. I urge the Assessment committee to challenge the failure to consider Kensington, the failure to look at how urban design can be applied to onramps, and the weak promises that are suggestive of window dressing. I want to live in an area of creeks and parks, not under a road. I was here first. Look to the eastern wastelands for your road corridor if you are determined to burn these funds on cars and trucks. And have a good look at probity and conflict of interest whilst you are at it. No-one else is.</p> <p>FAILURE TO INTEGRATE FINDINGS OF EXPERTS</p> <p>I spoke with Tim Wills about ecology. He made a most interesting comment, which was that he had no idea what the Urban design bloke had told me. In challenging that I found that this whole thing has been done in siloes. The eco man has no clue about the proposed urban design. Urban design know nothing about heritage. Heritage knows nothing about noise. Noise is not working with traffic. This is a severely Un-integrated assessment. I invite the Assessment Committee to consider how this can possible be an appropriate approach to a comprehensive impact statement.</p>
Chapter 10 page 30		<p>FAILURE TO CONSIDER BRUCE ST COMMUNITY</p> <p>There are absolutely no mitigants to the road plan as presented. First, as stated, the CIS makes no mention of the community on the west of Moonee Ponds creek and pretends it is not there. Bent St is not the only place people live.</p>

		<p>I challenge that it is acceptable for LMA to create a permanent depot at the end of our road, yet make no mention of impacts.</p> <p>I challenge that the C190 plan will not be able to be executed where we live, leaving us with nothing, when on the other side of the creek there is industrial wasteland which would impact no-one.</p> <p>OPEN SPACE DISASTER and STRATEGY TRASHED</p> <p>I challenge that in the area where there is least public open space, our community will suffer more than any other, and this impact will be permanent and there are no mitigating plans to remedy this situation. This area has been assessed by local Councils as having the greatest need for public open space, and the C190 plan could remedy this now. If the road was placed on the east of the creek, there would be no impacts.</p> <p>ALREADY SIGNIFICANT IMPACTS ON UNDERASSESSED AREA</p> <p>Every single line in section 10.8 shows a maximally high impact for this precinct.</p> <p>I spoke with Lisa Ryan and Christine Wyatt. They gave me assurances that my statements to them were indeed severely impactful in nature, proof of the flawed reference design, and worthy of making a detailed submission. With the location of the reference design based on wrong assumptions, Kensington is at risk of being overrun by a structure where the costs locally are so high and frankly, so unnecessary, that they outweigh the (poorly defined and completely untransparent) benefits to the wider city. This CIS and reference design have been started on incorrect assumptions and the errors and gaps have compounded from there. I urge the Assessment Committee not to support further progress on this road.</p> <ul style="list-style-type: none">• Huge overshadowing viaducts, much higher than what is there now• Encroachments on communities not mentioned AT ALL in the CIS• Land acquisition and impacts that are not commensurate with impacts should the road be on the other side
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		<ul style="list-style-type: none">• Noise, smell, pollution, traffic• Removal of light, vegetation and open space from the creek and its environs• The Urban design framework pictures showing proposed designs are absolutely depressing beyond hope. NO• Reduced pedestrian and cycle movement – I ride to work• Reduced open space qualities that do not meet standards• Reduced biodiversity• No sunny safe welcoming open spaces – instead dark, dangerous and depressing ones <p>The impacts of placing the road on the west bank of the creek are horrendous and should not be considered.</p> <p>IMPACTS UNACCEPTABLE IN KENSINGTON</p> <p>I submit that there is a design that can use the east side that has not been properly assessed. I submit that the impacts on Precinct 5 are outrageously high. I submit the unimpeachable FACT that these have been pushed into the plan without considering a whole section of heritage residences and communities.</p>
Chapter 10 page 32 Chapter 16 page 23		<p>IMPACTS NOT MAPPED PROPERLY IN KENSINGTON</p> <p>In the Macaulay Road to Arden Street section here is no mention of the Bruce and Elizabeth St communities and the highly significant impacts.</p> <p>I submit that this CIS has not properly assessed this road. There are maps showing huge impacts on the area yet the CIS does not mention any of this. It is conveniently silent. There is a giant Mill (Allied Mills) that has complex transport needs, and whose traffic patterns will be significantly affected by the road. Not only that, any adjustments to the way they move their local traffic has the potential to badly impact local residents. Landscape impacts are not confined to the road itself. They occur when entire streets are closed, when trucks start to be directed down residential streets, when street parking gives over to four lane roads, where entire neighbourhood characteristics are at risk.</p>

		<p>MILL TRAFFIC UNASSESSED within LOCAL CONTEXT</p> <p>It is critical that Mill traffic is directed to Arden St and NOT via Bruce St where there are houses. Where has all this been considered? I submit that there has been no consideration of the real landscape impacts on many of the communities impacted by the road and that this road should certainly not proceed. The CIS suggests the truncation of our entire street would not be significant. Unless managed properly, it would be. The Mill traffic can't turn the corner and Bruce Street would definitely need to be a dead end road to protect residents from the 30% increase in traffic. Who will win this conflict if it arises? Residents requiring a quiet street? Or big business? No bet.</p>
Chapter 10 page 34		<p>NO ABILITY TO MEET STATED PERFORMANCE</p> <p>Based on just the analysis in the preceding few paragraphs, it is clear that this project is not able to meet any of its Landscape and visual performance requirements. I am not at all comforted by this table.</p> <p>ENVIRONMENTAL OFFSET LIMITED</p> <p>There are some comforting statements about offset in the CIS. In fact, only a few trees are eligible to be offset. All the other impacts are simple, impacts. There is little recourse under the framework to achieve any real level of offset. In fact there is no ability to offset these dreadful impacts on our creeks and parks and communities. The cost of this road is too high.</p>
Chapter 11 page 2		<p>ALREADY INTENTION TO SEEK EXEMPTIONS</p> <p>So, there are laws. The laws have limits. We expect some air quality limits to be exceeded all the time. So we will get an exemption.</p> <p>I expect that commercial arrangements are managed such that the abatement regime for non compliance is punitive. Sufficiently so, that residents are protected. There are too many commercial contract negotiations that are weak and able to be mismanaged by the tenderer.</p>

		<p>CORRUPTION AND DOUBTFUL PROBITY</p> <p>With corruption rife in the tenderers, and well-known litigious tenderers as well, Melbourne will be massively at risk if this is not put in place. I want the Assessment Committee to understand that there is no point in having standards and requirements on any of the TOR unless meeting these requirements has teeth.</p>
Chapter 12 page 5		<p>NO NOISE ASSESSMENTS per VICROADS POLICY</p> <p>We note that no noise monitoring was undertaken for our community despite this being a requirement of VicRoads traffic noise reduction policy.</p> <p>I submit that the LMA has failed to appropriately discharge its duty of care to our community. I submit that they themselves admitted they thought we were only an industrial area. I submit that the whole design is flawed as it failed to take this into account.</p>
Chapter 12 page 14		<p>FAILURE TO COMPLY WITH SCOPING DIRECTIONS</p> <p>The criteria for the project include noise modelling for the Arden St ramps. These are in scope. Where is the modelling? It wasn't done. This omission is yet another part of the project that has simply conveniently not been completed.</p> <p>I submit that the lack of noise modelling on these ramps, and the attendant impacts of the ramps on an as-yet unacknowledged community, means that the CIS is not fit for purpose.</p>
Chapter 16 page 25		<p>UNDERSTATED IMPACTS ON BRUCE ST BUSINESS</p> <p>The impact on all these business issues in precinct 5 will also have direct impacts on residents in Bruce Street, nowhere mentioned or considered.</p> <p>The road is not in the right place, the reference design is flawed, the assumptions are incorrect or missing, and the CIS is a white elephant. I call for the Assessment Committee to challenge the reference design and the missing attributes, and stop this being built immediately. The hasty rush of this to tender before the reference design has been assessed and</p>

		ratified is an insult to the residents of Victoria.
		<p>OPTIMISTIC PARKLAND SUGGESTIONS IN ahem UNDERCROFT</p> <p>So, as we know urban design, traffic and noise have no clue about each other's work, let us investigate this. Urban design wants to put a concrete bund around a bog. They have no other way to do anything else, as the creek will die under the road and so will all normal plants and ecosystems. Great. We also hear a nice park could go under there and there is no need to count this area as loss of open space. What? C190 is trashed, all the parks planned in that strategy will not go ahead, our area is to become a through road, there will be a graffiti covered concrete bund to look at, and apparently all this is no loss at all to us? If the bogland is not a success we can have a park under the motorway and enjoy the traffic overhead (not that anyone measured how noisy this area would be) and the cigarette ends being flung from truck cabs as they hurtle past.</p> <p>TRAFFIC GOT THE MODELLING WRONG</p> <p>So, we spoke to traffic. They admit they got it wrong. Elizabeth St is one way. So the traffic modelling can not work for the Arden St off ramps. The thirty percent significantly impactful traffic that they say we will have, can not be forced on to Elizabeth St. None of these shiny-assed managers have come to see our area. They took a glance at a map from the safety of their armchairs, and drew on a line. They failed to see our whole community in Bruce St. They failed to see Elizabeth St is one way at Chelmsford. They failed to see the thirty percent has nowhere to go. They failed to see that in fact our residential area in Bruce St would really bear the brunt of the significant traffic increase, when it is not now used for through traffic. They failed to identify even the existence of our community. Their whole model is a disgrace and they admit it. This project envelope should NOT be anywhere near the west of Moonee Ponds creek. This CIS has not considered any of these impacts, it is misinformed.</p>
	CONCLUSION	I call upon the Assessment Committee to find these omissions and misstatements unacceptable, and roundly dismiss this

LISA S INGRAM, 5 BRUCE ST, KENSINGTON, VIC 3031

		proposed road, now, and for future generations. ends
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