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Submission to the East West Link Assessment Committee

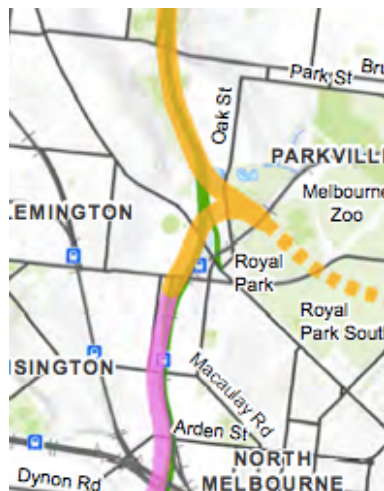
Statement of grounds:

I submit that the Assessment Committee should recommend the Planning Minister **NOT approve or grant** the relevant planning amendment, heritage permits, water licence, road management consent and EPA works on the following grounds:

- The impacts on **traffic** performance of surrounding roads have not been adequately addressed;
- Disruption to **cycling and pedestrian** access has not been adequately addressed;
- The project will have an unacceptable impact on the **use of park land, residential land and community infrastructure**;
- The proposed Urban Design Framework does not contain measures that will adequately address the impact of the project on **visual amenity** for residents and land users;
- The **noise and air emissions** from the project have not be adequately addressed by the CIS;
- The project will have an irreversible **impact on heritage zones and sites** and measures to mitigate this have not been addressed by the CIS;
- The **impact on ground water** has not been adequately addressed;
- The project will have an unacceptable **impact on native vegetation** in parkland and fauna in Royal Park; and
- The **Environmental Management Plan** in the CIS will not adequately address the environmental performance of the project.

This submission focuses on Precincts 3-5 (the western end of Part A and a section of Part B of the project) including:

- Elliot Avenue interchange
- CityLink interchange, with new elevated structures connecting the tunnel portals in Manningham Reserve to CityLink
- Additional traffic lanes on the Tullamarine Freeway
- An exit ramp to Ormond Road and upgrades to the Elliott Avenue/Flemington Road/Racecourse Road/Mount Alexander Road intersection
- A three kilometre elevated road (viaduct) parallel to and on the western side of CityLink from Mount Alexander Road to Footscray Road



Transport connectivity

- The impacts on **traffic** performance of surrounding roads have not been adequately addressed;
 - Disruption to **cycling and pedestrian** access has not been adequately addressed;
1. **Increase in traffic on Elliot Ave:** The CIS estimates an increase of up to 10% on Elliot Ave. The interchange between the East West Link and Elliot Avenue will move significant numbers of vehicles onto Elliot Avenue, as it is the primary exit from the tunnel for any traffic not travelling north (to the airport) or south/west (to the port). The technical report for the CIS (Appendix E) states:
"The strategic modelling indicates that Elliott Avenue would not be able to accommodate forecast traffic volumes."
 2. **Dual right hand turn from Elliot Avenue should proceed regardless:** The "design enhancements" to deal with this impact include dual right hand turn lanes into Flemington Road from Elliot Avenue. The dual turning lanes should be implemented regardless of whether an East West Link is built as this would have a positive impact on existing traffic congestion for cars waiting to turn onto CityLink and Mt Alexander Road from Elliot Avenue. It should be implemented immediately to assess its capacity to reduce congestion when Elliot Avenue traffic increases.
 3. **Increased traffic around Royal Park:** Traffic is destined for northern or inner suburbs. This traffic can be expected to exit the tunnel at Elliot Avenue significantly increasing traffic around the Zoo precinct, Gatehouse St, Racecourse Rd and in Parkville.

The CIS estimates that “around 50 per cent of eastbound traffic on the Eastern Freeway in the morning peak period originates in the western or north-western suburbs”. Accessing the Elliot Avenue on-ramp to commence a west-east journey from inner north and western suburbs (including North Melbourne, Flemington, Moonee Ponds, Ascot Vale, Parkville, Carlton and Kensington) will require the use of Flemington Road, Gatehouse Street, Macarthur Road and streets around the zoo precinct.

4. **Roads in Royal Park likely to be altered to address traffic flows:** The Elliot Avenue entry point for the tunnel is problematic as feeder roads weave through Royal Park and are not easily accessible. The CIS does not adequately address this. It is anticipated that the resulting congestion from this arrangement will eventually lead to redevelopment and widening of these feeder roads.
5. **Macarthur Road estimates questionable:** The CIS estimates that traffic will reduce on Macarthur Road by 20-30%. Given the option of travelling west through the tunnel and exiting at Elliot Avenue to reach Parkville, Carlton, and the university and hospital precinct, this estimate is questionable.
6. **No traffic mitigation measures around Ormond off-ramp:** The Ormond Road off-ramp will carry an estimated 12,000 vehicles per day onto Ormond Road. Traffic is expected to increase on Ormond Road by up to 30%. Vehicles will then move through residential streets (Mooltan, Pattison, Steele, Addison, Vine) in order to access Mt Alexander, Ascot Vale and Pascoe Vale Roads. There are no measures suggested in the CIS to reduce traffic congestion in Ormond Road and increases in surrounding suburban streets. With the possibility of a high-density development at the Moonee Valley Racecourse, the traffic flows in this area will be significantly altered and increased.
7. **Cycling routes not adequately protected:** Cycling routes along Moonee Ponds Creek and through Royal Park will be disrupted and altered as a result of the construction of the East West Link. The performance requirements of the project state the construction team must “maintain, and where feasible, enhance pedestrian movements and bicycle connectivity”, but this is insufficient protection against the interruption, both permanent and temporary, to the paths that exist throughout Royal Park and along Moonee Ponds creek and Travancore Park.

Land use, dwellings and infrastructure

- The project will have an unacceptable impact on the **use of park land, residential land and community infrastructure**
- 8. **Destruction to Royal Park is underestimated and unacceptable:** The CIS acknowledges the project will lead to the destruction of Ross Straw Field in its current form: *“Ross Straw Field could not be reinstated in its current configuration”*.

The means of addressing this cannot reverse the impact on the park and the loss of a recreational sports field and surrounding parkland. The requirement on the contractor to minimize visual impact is impossible to achieve to any level of satisfaction to those using Ross Straw Field.

“The contractor would be required to design project structures to minimise visual and other impacts on this part of the park. There may also be options to reorganise the layout of the area – or design areas beneath elevated structures – for recreational and sporting uses.”

9. The loss of the parkland is underestimated by the CIS as it does not account for the areas

beneath the flyovers which will become unusable as recreational parkland or areas of rich vegetation.

“Temporary occupation of up to 23.27 ha of Royal Park and sections of Debneys Park and Travancore Park. Permanent acquisition of 1.36 ha of Royal Park (including Ross Straw Field), 0.02 ha of Debneys Park and 0.001 ha of Essendon Community Garden.”

10. The CIS states there will be minimal impact to parkland surrounding Elliot Avenue.

“While some parkland qualities around the Elliott Avenue interchange would change, there would be limited loss of parkland. The proposed configuration of the intersection at Elliott Avenue – predominantly below ground level and in cutting – would minimise impacts on the surrounding parkland, with the interchange structure visible only from its immediate vicinity.”

This is a gross underestimate of the impact the tunnel portals and connection to Elliot Avenue will have on the vegetation and parkland.

11. Destruction to Debney’s Park is unacceptable: The loss of the \$2.5m Debney’s Park playground – opened in 2011 – is an unacceptable outcome of the project design. The requirement to minimize impact on the park and surrounding open space is inadequate given the unavoidable and complete loss of the playground.

12. The requirement to “reinstat e public open spaces and facilities disturbed by temporary works to the satisfaction of the land manager” provides no assurance regarding the replacement of community assets disturbed by permanent works.

13. Overshadowing of Essendon Community Gardens should be avoided: The Ormond off-ramp will impose overshadowing on the Essendon Community Gardens and will result in the loss of up to one third of the available garden plots. This is an unacceptable impact on the land use surrounding the existing CityLink.

14. Impact on residences in Parkville is unacceptable:

“Property acquisition: 55 residential properties (four houses and 51 units) and one commercial property. Residents and developer of EVO apartment complex given early voluntary purchase options.”

The impact on the residential zone of Parkville between Royal Park and CityLink is unacceptable. Displacing the residents of 55 properties and the future owners of EVO apartments is unsupportable. The security of residential land in inner Melbourne must be preserved and not threatened by unexpected infrastructure that does not service the residents displaced, nor the remaining residents adjacent to the infrastructure.

15. Impact on Flemington Community Centre is unacceptable: The centre will be closed throughout the construction period leaving an entire community of residents without essential community infrastructure.

16. Impact on Travancore Park is unacceptable: Travancore Park is a regional dog-walking park. The Moonee Ponds Creeks currently provides a buffer between the park and CityLink. The buffer will be removed and potentially replaced with a large and obtrusive sound barrier (see visual impacts below).

17. Residential zones and open space will become road zones: Parkland is sparse in the inner city suburbs of North and West Melbourne, Flemington, Ascot Vale and Kensington. Land that is currently zoned as open space should not be appropriated for large-scale road infrastructure.

Residential zoned land in inner Melbourne should also be preserved as residential and not rezoned for large road infrastructure.

18. **Mitigation measures are insufficient:** The requirements that the “design [minimizes its] permanent footprint to reduce adverse impacts on potentially affected land uses, particularly Royal Park” is inadequate given that the project will forcibly acquire 70 residential homes in the area discussed in this submission and the entirety of Ross Straw Field, Debney’s Park Playground. The impacts on parks along the Moonee Ponds Creek and the Essendon Community gardens are also significant.

Visual amenity

- The proposed Urban Design Framework does not contain measures that will adequately address the impact of the project on **visual amenity** for residents and land users.
19. **Elements of the design will result in significant adverse impacts on visual amenity as detailed** by the CIS:

Asset/value	Precinct	Urban landscape impact	Receptor sensitivity	Significance of impact
Oak Street and Manningham Street	3	Large adverse	High	Major significance
Moonee Ponds Creek edge at Travancore Park and related parklands	3	Moderate adverse	High	High significance
Adjacent to ALT Tower Mount Alexander Road	3	Moderate adverse	High	High significance
Mount Alexander Road and Flemington Road	3	Moderate adverse	Medium	Moderate significance
Debneys Park	3	Large adverse	High	Major significance
Variation for cut and cover construction in Precinct 3 – Royal Park Precinct	3	Large adverse	High	Major significance
Ormond Park and Holbrook Reserve	4	Moderate adverse	Medium	Moderate significance
Remaining waterway corridor values of Moonee Ponds Creek between Racecourse Road and Macaulay Road	5	Large adverse	Medium	High significance

Elliott Avenue in Royal Park	3	Large adverse	High	Major significance
Ross Straw Field	3	Large adverse	High	Major significance
Storage basin of the Royal Park Wetlands (Trin Warren Tam-boore Wetlands)	3	Large adverse	High	Major significance

20. **The areas most affected include:** Royal Park, Manningham St and Oak St, areas surrounding the Ormond Off-ramp, Elliot Avenue interchange, Travancore, Flemington Public Housing Estate, Kensington, Flemington Hill (eastern side).

21. **The structures with the greatest impact include:**

- Interchanges and structures within a section of Royal Park, Ross Straw Field and the storage basin of the Trin Warren Tam-boore Wetlands and parts of Debneys Park, Ormond Park and Holbrook Reserve
- Tunnel ventilation structures at portals (and a potential mid-tunnel air intake) Elevated structures near residential properties in Manningham Street, the ALT tower, Flemington public housing towers and Flemington Community Centre
- Additional structures over Moonee Ponds Creek
- New viaduct structure along the western side of CityLink. In Precincts 1, 3 and 5, new structures constructed for the project (including the tunnel portal, noise walls and ventilation structure) would have an impact on neighbourhood character and amenity.

22. **Sound walls and pylons will have an adverse impact on current parkland.**

23. **The CIS notes the severity of the impact:**

“In the long term, Elliott Avenue would change from having something of a ‘parkland drive’ character (albeit one that carries very high volumes of traffic) to a multi-level roadway and interchange.

The bulk, scale and varying vertical and horizontal alignments of the elevated roadways over the existing Ross Straw Field would wholly change the landscape. This would include loss of playing fields, loss of vegetation, loss of amenity, loss of flexibility of use and loss of landscape setting.

In the long term, the character of Oak Street and Manningham Street would be changed permanently to a road with overhead freeway and bridge structures. The parkland interface and outlook for residences along these streets would change to a series of elevated roadways.”

24. **Measures to minimize the visual impact are vague and overly optimistic:** The impacts on the parks and community facilities will be permanent and irreparable. Rebuilding Debney’s playground will require the appropriation of current open space used for sport and recreation.

*“For Debneys Park, these **could** include replacing any recreation and community facilities and open spaces through functional urban design, minimising the spatial impacts of new structures, optimising the usability of areas under elevated structures (including providing shared use paths and play areas) and maintaining and enhancing active play areas.”*

Noise, vibration, air emissions and light spill

- The **noise and air emissions** from the project have not be adequately addressed by the CIS.

25. **The CIS notes zones in which noise levels are certain to increase:** According to the CIS, there will be an increase in noise levels at sensitive receptors as a result of the increase in airborne noise; excessive traffic noise in residential areas (specific to above-ground sections of EWL associated with precincts 2 (excluding Elliott Ave), 3, 4 and 5); and this will affect residential areas, users of public open space and other sensitive receptors adjacent to above-ground sections of EWL.

26. The CIS acknowledges that sound mitigation measures will be necessary:

“Without additional noise mitigation, the noise target of 60 dB is predicted to be exceeded at ground level at:

- *The Travancore estate to the west of CityLink*
- *Parkville Avenue and Oak Street east of CityLink*
- *Parkville Apartments east of CityLink*
- *Manningham Street south of East West Link carriageways*
- *Evo Apartments on Manningham Street. These buildings are currently exposed to high noise levels from CityLink .”*

The mitigation measures should not use current levels as the measure, but apply standards to reduce net noise impact, not additional impact, from the project: The CIS suggests that where noise impact is not more that 2dBA above existing noise, mitigation measures will not be required. This is unacceptable.

*“The noise target of 60 dB LA10(18h) would be exceeded at the facade of apartment buildings. The facades of buildings at the Flemington social housing estate, ALT Towers and Parkville Apartments that face the project **are currently exposed to high levels of noise from CityLink. It is unlikely the additional noise from the project would be sufficient to increase noise levels by 2 dBA.** However, as noted above, there is the potential for an increase in noise levels of more than 2 dB for the north-east and south-east facades of Evo Apartments. **The East West Link contractor should quantify CityLink noise levels before designing noise mitigation for the project, so that appropriate noise limits can be applied.**”*

27. The assertion that noise levels will reduce in Elliot Avenue contradicts estimates that traffic will increase 10%.

28. **The noise impact on Ross Straw Field and surrounding areas is unacceptable:** he CIS anticipates that *“predicted noise levels in Ross Straw Field are typically 60 - 65 dB LA10(18h) and up to 70 dB near the portals. This may limit the use of this section of Royal Park to noise-tolerant activities such as running or cycling.”* This is an unacceptable alteration of land use as a result of noise impacts.

29. **The noise of trucks on gradients has not been adequately addressed:** Given the objective of the project to move freight more easily and efficiently, it can be expected that high numbers of trucks will use the elevated ramps throughout Royal Park and connecting to the new viaduct. The noise from trucks speeding and braking along the gradients of these ramps will be loud and intrusive across parts of Parkville, Flemington, Ascot Vale and Kensington. Heavy duty sound barriers would be needed to reduce these noises to within acceptable levels as stipulated by the CIS.

30. Trucks will cause significant vibrations close to the ALT Tower and Public Housing in Flemington and Travancore.

Cultural heritage

- The project will have an irreversible **impact on heritage zones and sites** and measures to mitigate this have not been addressed by the CIS

31. The project disregards the residential heritage value of Flemington, Travancore and Ascot Vale. The requirement for the eastern section of the project to be underground to preserve residential heritage value is laudable. This requirement stops 200m west of Elliot Avenue. This is unacceptable and unfairly subjects heritage areas west of Elliot Avenue to impacts not experienced by areas east of Elliot Avenue.

Surface water and groundwater

- The **impact on ground water** has not been adequately addressed;

32. At commencement of tunnel the tunnel will have a damming effect, acting as a physical barrier to regional groundwater flow, particularly in Precinct 2. This is unacceptable and will require costly and ongoing maintenance.

Native vegetation and biodiversity

- The project will have an unacceptable **impact on native vegetation** in parkland and fauna in Royal Park; and

33. The CIS erroneously states “there would be no net loss in the contribution made by native vegetation to Victoria's biodiversity”. The loss of the Skink habitat, wetlands, remnant and significant native trees in Royal Park, the direct removal of up to 93 scattered locally native trees in Royal Park (planted and remnant) during construction, leading to a loss of nesting, roosting, denning and foraging habitat for native birds and mammals will all contribute to a loss of biodiversity.

Environmental management framework

- The **Environmental Management Plan** in the CIS will not adequately address the environmental performance of the project.

34. The Planning Minister will determine whether the performance requirements have been met. Will there be recourse for residents where Planning Minister deems PR has been met?

The CIS acknowledges temporary and permanent environmental damage by the project. Performance requirements cannot do any more than “minimize” or where possible replant and replace the environment that is harmed.

Consequently, the CIS does not have adequate protection from the following environmental impacts of the project:

- *Significant temporary and permanent impacts on Royal Park from the western portal and the CityLink and Elliott Avenue interchanges*
- *Access to parts of the park would be limited during the project's construction phase and sporting clubs using Ross Straw Field would need to relocate.*
- *A section of the park (1.36 hectares or 0.8 per cent of the park's total area) would be permanently acquired for the project.*
- *New elevated structures would be visible from the area adjacent to Ross Straw Field and the Elliott Avenue interchange, and Ross Straw Field could not be fully reinstated to its current configuration.*

- *Proposed elevated structures would affect the amenity of Manningham Street and Oak Street residents.*
- *Sections of parkland and open space in other locations would also need to be acquired permanently, including small strips of Debneys Park, Ormond Park, Holbrook Reserve and Moonee Ponds Creek Linear Reserve.*
- *The visual impacts from the project's elevated structures would also have a permanent effect on residents and neighbourhoods in parts of Precinct 5.*
- *The construction of the tunnel would create the risk of disturbing contaminated groundwater. While potentially significant, these risks are not uncommon for tunnelling projects in urban settings and would be managed through a tanked tunnel design, the use of recognised tunnel construction methods and pre-construction groundwater modelling.*
- *Some locations could be affected by construction activities for a period of up to five years, with impacts such as dust, air quality, noise and vibration needing to be carefully managed. Local access in some areas could be disrupted by short-term road closures and increased traffic during construction. These temporary construction impacts are common to all large infrastructure projects and well-established and tested mitigation measures would be adopted to lessen any impacts.*

Conclusion:

It is submitted that as a result of the impacts listed in the 34 points above, the required planning approvals for this project should not be granted by the Planning Minister.