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North East Link Project: Submission on Environment Effects Statement

Victoria Walks does not support the North East Link (NEL) Project, for a range of reasons outlined in Part One of this submission.

If NEL is to proceed, Victoria Walks has a number of concerns around the design proposed, although some details are not entirely clear. Part two of this submission explores issues of how NEL should be designed.

Recommendations

1. Decline the project; or
2. In the event that NEL is to proceed, ensure that:
 - a. Separate walking and cycling paths (rather than shared paths) are provided on the primary routes, or where it can be expected that the number of commuter cyclists will exceed 50 per hour in peak hours, ten years after completion of the project.
 - b. No existing footpaths are converted to shared paths.
 - c. Existing formal and informal crossing points of Greensborough Road are replaced with crossings of the new freeway.
 - d. The detailed design of access across the freeway and similar barriers provide direct, convenient access for walkers (including stairs in addition to ramps, where applicable).
 - e. Significant environmental compensation that enhances recreational walking in the area is provided, in recognition of the significant adverse environmental impacts of the Freeway. This should include provision of a walking path on the eastern/southern side of the Yarra, roughly between the Burke Road Billabong Reserve (adjacent to the Eastern Freeway) and Finns Reserve.
 - f. Design of the Bulleen busway station and access to it seeks to encourage walking to the station.
 - g. All of the above measures are provided as part of the 'core' project, not as complementary or possible additional projects.

Part One – reasons for opposition

1. Induced traffic

The concept of induced traffic is well researched. Building new freeways does not solve the problem of traffic congestion. The Environment Effects Statement (EES) states that part of the justification for NEL is congestion on other freeways (e.g. the M1). Making driving easier means more people will drive, however driving is the most inefficient means of moving large numbers of people. Multiple government departments and strategies¹ promote modes other than driving to reduce congestion and emissions, and improve health, amenity and efficiency.

Major projects like NEL are undoubtedly city-shaping. The question is, what shape are we aiming for? A car-oriented city, or a city based around public transport and walking? New freeways like NEL take us in the wrong direction.

We have to become smarter about how we use existing road infrastructure rather than continue to spend billions of dollars on new infrastructure.

2. Value for money

Large scale transport projects should be considered in response to clearly defined problems. Then various options should be properly assessed, compared and the business cases made public before the commitment to build them, (as [advocated](#) by Marion Terrill, Transport and Cities Program Director at the Grattan Institute).

[Infrastructure Victoria](#) released a 30-year strategy in 2016 which included the NEL project. However, the strategy stated, “if we had a choice between accelerating this project [NEL] and the many smaller programs ... we would prioritise the latter.”

The NEL will cost \$16 billion of public money, with a supposed return of \$1.30 for every \$1 invested. Compare this to investment in walking or public transport. A [recent review](#) of 20 different studies suggested a cost benefit ratio for walking infrastructure ten times that of the NEL – \$13 for every \$1 invested. The [Parliamentary Budget Office](#) found that increasing tram and train services to run every 10 minutes during off-peak and weekend periods would cost \$2.15 billion dollars over the next ten years. At that rate, regular, high quality tram and train services for all of Melbourne could be operated for at least the next seven decades for the same cost as building 11km of new tollway.

3. Severance effects

There is a potential that a new tollway will sever connections for people either side, particularly for the section in trench and at grade. In relation to the trenched section, although five new land bridges will be created, it is not clear that this will compensate for loss of the existing potential to cross at grade. It does not offer the same benefits as recently elevated train lines where the removal of a significant barrier has led to the community ‘rediscovering’ the other side.

Although some walking and cycling links are included as part of the project, some [reports](#) suggest consultation has been unable to influence design to ensure they are of a high quality standard.

¹ e.g. [Plan Melbourne](#), [VicRoads Movement and Place](#), [Department of Transport](#), [The Victorian Cycling Strategy](#)

The EES claims to provide for walking and cycling with new and upgraded links. However much of the commentary around 'active transport' is focused on cycling. Walking is not cycling, and people walking have very different needs to those riding.

These issues and potential design solutions are the focus of Part Two of this submission.

4. Negative environmental impacts

The final route for the NEL will significantly impact open space and recreational areas. Although 6 km of the tollway will be in a tunnel, it will still result in loss and fragmentation of bushland, parklands, open space, recreational areas and sporting facilities (e.g. tennis courts, swimming facilities, golf course, ovals), as well as vegetation including mature trees. Less than 5% of permanently acquired open space will be replaced (182,300 m² and 8,450 m² respectively). In addition, even more public space will be lost temporarily during the estimated seven-year construction period. This is likely to have negative health and social impacts for people who currently use the open space and may impact on the liveability of the area.

The proposal will also significantly impact existing waterways and floodplains, which the EES found to be associated with "higher quality ecological assets within the assessment area". The diversion and piping of the Koonung Creek and diversion of Banyule Creek are proposed as part of the NEL project. Koonung Creek was heavily modified as part of the Eastern Freeway construction and is now rated as very poor water quality. Melbourne Water in 2007 found it retains important fauna and "sites of significant Aboriginal heritage" and in 2015 that it meets six of the ten State Environment Protection Policies (SEPP) objectives. Banyule Creek is currently faring better, with a water quality rating of moderate. Consider the Moonee Ponds Creek, which was concreted as part of the Tullamarine Freeway construction in 1970s and has since been listed as one of the [top planning disasters](#) for Victoria by the Planning Institute of Australia. The Environment Protection Authority last measured its water quality in 2016-17, scoring it zero out of 10, a rating that signifies a level of pollution that kills most organisms. Is this the future for the Koonung and Banyule Creeks?

The NEL will also result in a reduction of water level at the Bolin Bolin Billabong. According to [Melbourne Water](#), who are currently working to rehabilitate this with other agencies, the billabong is "one of the few remaining in urban Melbourne and has high ecological and cultural significance".

Part Two – NEL design

Victoria Walks support the proposed improvements to the walking, cycling and public transport facilities which have been included as part of the NEL project scope. Whether these measures will provide a better outcome for walking than the current situation is unclear. However it is apparent that:

1. The benefits could be achieved without the North East Link Project, at a fraction of the \$16 billion cost.
2. Walking could be better provided for than the current proposals.

The EES suggests NEL aims to provide for walking and cycling with new and upgraded links. However much of the information around 'active transport' is focused on cycling. There is no mention of footpaths or pedestrian connections on the NEL's [Walking and Cycling webpage](#). The legends on the [early concept walking and cycling maps](#) do not even mention any pedestrian facilities, only cycle paths.

It seems the off-road 'cycle' paths will actually be shared paths for both walking and cycling. Presumably all new crossings will be for both people walking and riding.

Walking however is not cycling, and people walking have very different needs to those riding. Lumping walking together with cycling is likely to lead to sub-optimal and in some cases totally inadequate responses for walking.

5. Separated paths not shared paths

Many of the shared paths as part of this project are 10-20 km from the city and connect directly to the CBD, meaning it is likely they will function as high volume, high speed bicycle commuter routes. This is not compatible with walking, particularly for more vulnerable walkers. Where there are significant numbers of commuter cyclists, separate walking and cycling paths should be provided.

Both walkers and cyclists prefer separate paths when there are lots of people using the path. In a survey of over 600 Victorian cyclists, 66% said they 'really like' riding on a segregated path compared to 7% for a shared path.² Separated paths represent world's best practice and are standard practice in nations with strong cycling cultures, such as the Netherlands.

For older people, walking is critical to their personal mobility and their capacity to lead active, independent lives, as well as comprising the majority of their physical activity. In a [survey](#) of more than 1,000 Victorians aged 60 or over, 39% identified bicycle riders on shared paths as a moderate or major constraint to their walking.

Victoria Walks has researched this area of shared vs separated paths in detail, including consultation with asset providers. The research and resulting recommendations are set out [here](#). In summary, this research determined that separated paths should be provided on strategic cycling routes or any route where the number of cyclists is expected to exceed 50 per hour in the commuter peak; and shared paths should not replace footpaths in and around activity centres, retirement villages, aged care facilities or on a Principal Pedestrian Network.

With the additional paths and links provided by NEL, a significant upturn in commuter cycling can be expected. Victoria Walks rejects any suggestion that shared paths will provide an adequate level of pedestrian infrastructure for this project. Separated paths need to be provided.

6. New connections

We support the new connections across both existing barriers (M80, Yarra River, Lower Plenty Rd and Eastern Freeway) and the barrier a new tollway will create. However, it is not clear whether these adequately respond to the local context and provide access to all the destinations that could reasonably be expected. Victoria Walks has not seen any analysis of destinations or key walking routes close to the freeway route and whether walking access is provided in response.

The existing Greensborough Road is generally quite hostile to walking and has its own severance impacts, exacerbated in parts by the railway line. However, consideration still needs to be given to the current potential for people to cross Greensborough Road informally, unimpeded by changes in level. There need to be regular crossing points over (or under) the new freeway to compensate for the loss of that opportunity.

Victoria Walks also have concerns that the final design of crossings may be highly inconvenient for most people walking, especially if access is based on shared paths. This is particularly the case where crossing points involve a change in elevation. While it is important to include ramps at overpasses for people who are unable to use stairs and those riding bicycles, stairs provide the most direct access for walkers, reducing the distance that must be travelled compared with long ramps that often wind back on themselves. The existing overpass at Nell Street provides an example of an inconvenient, indirect connection, likely to deter people from using it.

New crossings need to be direct and provide access to places people want to go (e.g. train stations and shops). For example, the proposed overpass north of Nell St is shown at a significant angle and would require people to walk much further than a shorter, direct bridge.

² CDM Research (2012). 'Cyclist Route Choice Survey,' unpublished report to VicRoads.

Underpasses are proposed at four locations as part of the project. The success of an underpass depends a lot on its design. Wide, well-lit, short underpasses with good visibility and natural light are more welcoming and pleasant places to walk than the dark, narrow corridors traditionally built.

Even better are crossings at the same level where people are already walking, such as the land bridges proposed where the tollway will be in trench through Watsonia. Not only does this minimise walking distance, but it has other benefits such as better visibility (improving feelings of safety) and amenity.

7. Opportunities for environmental compensation

Given the significant adverse environmental impacts of NEL, summarised in section 4 of this submission, opportunities for compensation should be implemented.

One significant opportunity is to provide for additional recreational walking access to the Yarra River in the vicinity of the project.

Walking is easily the most popular form of recreation and physical exercise, especially amongst demographics who typically exercise less than others, including women and older people. The Yarra River is highly attractive for walking and is one of Melbourne's most significant recreational assets.

Currently, there is no continuous walking route along the south-eastern side of the Yarra River in the vicinity of the freeway, even though this is mostly public land. There is a potential to provide a significant recreational asset with a walking path on the eastern/southern side of the Yarra, roughly between the Burke Road Billabong Reserve (adjacent to the Eastern Freeway) and Finns Reserve. This would connect other open space areas such as Bulleen and Birrarung Parks, as well as the Heide Museum of Modern Art.

There is also a general lack of pedestrian connections across the Yarra River. Additional River bridges should be provided in the vicinity of Bulleen, Banksia and Birrarung Parks.

8. Busway

Walking and public transport are highly inter-connected and complementary.

Victoria Walks supports improved public transport including the dedicated busway proposed on the Eastern Freeway. We note that the NEL is 11km of new tollway, but as part of the project scope the upgrade of 15 km of existing freeway (the Eastern) is proposed.

As part of the busway, a new Bulleen bus station is proposed. The location of the bus station, adjacent to the Eastern Freeway, and the concept of a park and ride based facility, does not lend itself to walking access. Nonetheless there is a significant potential for walking to the station. Despite continuing government efforts to facilitate driving to railway stations with expanded car parking, and a general absence of effort to encourage pedestrian access, walking is still the primary mode of access to stations across Melbourne (although this varies substantially between stations).

It is important that the design of the Bulleen busway station and access to it seeks to encourage walking to the station. We are yet to see any detail on design or access to the bus station, but the model of a park and ride facility is concerning.

Contact

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