



Town and Country Planning Association Incorporated

Box 312, Collins Street West P.O., Melbourne 8007

Registration no. A0031095J

<http://www.tcpa.org.au/>

7 June 2019

Mr Nick Wimbush
Chair, North East Link Inquiry and Advisory Committee
Planning Panels Victoria
1 Spring Street,
Melbourne, Victoria, 3000
Email: planning.panels@delwp.vic.gov.au

Dear Mr Wimbush

Submission to the North East Link Project Environment Effects Statement

Background

The Town and Country Planning Association Inc. (TCPA) is a politically independent, not-for-profit association incorporated in Victoria. Its members and supporters represent a wide cross-section of land use and transport planning expertise and interests.

TCPA began life as the Victorian Town Planning and Parks Association, which was formed in Melbourne in 1914, with Dr J. W. (later Sir James) Barrett the first president. The name was later changed to the TCPA. Its objects were “to give the town a bit of the country, and the country a bit of the town, to secure better housing, to protect existing parks, to safeguard native animals and plants and erect memorials to explorers”. The TCPA adopted a new constitution and was incorporated in 1994.

The objectives of the TCPA include:

- To promote the application of principles of ecological sustainability to existing and new settlements and urban regeneration;
- To encourage the practice of environmental planning;
- To advocate the establishment of an effective strategic planning framework;
- To motivate, educate and inspire popular support for environmental planning;

The TCPA’s philosophy towards the planning and regulation of land use and related public functions is described in *A Charter for Planning*, adopted in 1997 (TCPA Charter). While the Charter is currently being reviewed, the TCPA considers that the Charter sets out the planning goals, ethical values and principles that the TCPA believes should underpin all urban and rural planning decisions, policies and strategies.

(See TCPA website at <http://tcpa.org.au/other-documents/>)

North East Link Project Environment Effects Statement

Scoping Requirements

In preparing this submission to the *North East Link Project Environment Effects Statement* (the EES), the TCPA considered the matters outlined in the *Scoping Requirements for North East Link Environment Effects Statement* (June 2018) (the Scoping Requirements), including:

- 3 Matters to be addressed in the EES
- 4 Assessment of specific environmental effects

The EES structure does not mirror the content and detail of the Scoping Requirements. Matters of primary interest to the TCPA are scattered through Chapters 2, 5, 6, 9, 15, 16, 17 and 18 as well as in attachments and technical reports. There is no clear demonstration that the EES actually responds to the detail of matters outlined in the Scoping Requirements. Quite often matters to be addressed can be found across multiple sections in various chapters.

It would have assisted submitters and, no doubt the Inquiry and Advisory Committee (IAC), if there had been a table outlining which chapters and sections responded to each requirement of sections 3 and 4 of the Scoping Requirements.

The TCPA recommends that the IAC ask the proponent to prepare such a table and to have it available to submitters at least 2 weeks before the commencement of the Panel Hearing.

EES report

The TCPA considers that the EES requires more work to address some significant gaps and deal with other matters in more detail, some of which are outlined below.

- Throughout the document, the EES does not deal with the North East Link’s role as a city-shaping piece of infrastructure that will be of state (if not national) significance. It seems to consider the link as a sub-regional road of little interest to the broader community outside its study area despite it being acknowledged as the “missing link” in Melbourne’s and Victoria’s road network.
 - Section 6.3 of the EES includes only a superficial reference to the transport plans prepared for metropolitan Melbourne since 1969 despite the fact that the corridor options have had their genesis in those plans. These have been key guiding documents over the last 50 years. By giving such superficial coverage, the EES does a great disservice to their authors and to interested advocacy groups over that period, of which the TCPA was one.
 - The EES needs to be updated to provide more analysis of each of those plans to demonstrate the project’s understanding of the circumstances in which they were prepared and the options they proposed.
- The North East Link Project, as currently proposed, contradicts the provisions of the *Transport Integration Act 2010* by:
 - Being prepared in the absence of an overarching Victorian Transport Plan as required to be prepared under the Act.
 - Increasing reliance on private motor vehicle travel and encouraging longer journeys; and
 - Reducing the effectiveness of planned major public transport investments, in particular the Suburban Rail Loop, which will compete for a very similar market.

The TCPA believes that the EES needs to include an analysis of alternative ways of meeting and managing future transport demand that will be less detrimental to sensitive, established urban environments and will provide superior transport choices for Melburnians. This should include an assessment of scenarios with and without the proposed investments to ensure that the expectations of those communities for completion of the “missing link” are sustained over the long term – namely, beyond the 2050 timeframe for Plan Melbourne.

- The EES is selective in its considerations of national, state and local policy contexts, particularly in Chapter 2 Project Rationale.
 - not all objectives and guiding principles outlined in the *Transport Integration Act 2010* are addressed. The community expects that government transport agencies would address each objective and guiding principle, especially in an EES and Planning Scheme Amendment process;
 - more detailed discussion on Plan Melbourne, the Planning Policy Framework (PPF) and the Local Planning Policy Framework (LPPF) is required and how the project will address specific policies in each, not just their generalities
- Throughout the document, the EES omits discussion on endorsed Government policy statements; in particular, strategies on walking and cycling are not discussed, including the *Victorian Cycling Strategy 2018-2028* (December 2017). The EES needs to address how the proposal addresses the Strategy’s goals and strategic approaches

- The North East Link Project established a Walking and Cycling Community Technical Discussion Group. The Group included representatives from bicycle user groups as well as the general community, some of whom are members or supporters of the TCPA.
 - The EES contains no discussion on the scope and outcomes of the Group's deliberations, a significant gap as the Group has been mentioned in media and public forums on transport issues where the North East Link project was a key topic for discussion. This omission should be rectified.
- The TCPA is concerned that the North East Link Project would effectively sever the Yarra Trail, making two disconnected linear park/trails out of one of Melbourne's most significant active transport corridors. This would profoundly reduce its value as a highly valued community and environmental corridor – not just for the health benefits for Melburnians, but for tourists as well.

Panel and Directions Hearings

In raising these concerns with the NEL Project and its Environmental Effect Statement, the TCPA would seek to present its concerns at the Panel Hearing. We would require no more than 15 minutes to make our presentation.

At this stage, the TCPA does not anticipate calling any expert witnesses and will be represented at the Panel Hearing and, if necessary, at the Directions Hearing by:

- Ms. Marianne Richards, President, TCPA
- Mr Peter Hill, Honorary Secretary, TCPA

I will advise the IAC immediately should there be any change in our representation.

Yours sincerely



Peter Hill
Honorary Secretary
Town and Country Planning Association
Ph: 0402 132 633
Email: secretary@tcpa.org.au