



1. Introduction

Thank you, Madam/Mr Chair. The Town and Country Planning Association Inc. (TCPA) welcomes and appreciates the opportunity to appear before the Independent Advisory Committee today.

Our intention is to reinforce the issues and references to other documents raised in our submission and address any updated related information or matters that have emerged since, either in evidence, other submissions or the wider environment.

We have been conscious of the Terms of Reference for this IAC, noting that there are limits to the matters it can consider. For example, TCPA submission already noted that the risks to the project due to aviation operations serving Moorabbin Airport were not addressed in the SRL East Business Case and that gap could affect the design and deliverability costs of the project. We will note any gaps or uncertainties from the Business Case that could also affect design and deliverability costs of the project.

2. Liaison with other submitters

During our preparation for today's presentation we reviewed a number of submissions that shared some or all of our concerns. We were able to engage with those submitters to discuss and debate those concerns. It became apparent that the IAC's program and timeslots may be assisted if we were to share the foci of our submissions. Rather than each submitter separately arguing all aspects of its submissions, the key foci of each presentation would or could be endorsed by others.

The TCPA supports the submissions of:

- Rail Futures Institute Inc. (Submission No 281)
- Victorian Transport Action Group (Submission No 293)
- Professor Michael Buxton (Submission No 198)
- Mr Daniel Jordan (Submission No 93)

3. Introductory Comments

At the outset the TCPA wishes to make clear that it believes that planning for an orbital public transport corridor for metropolitan Melbourne is important. The corridor will:

- Create cross links between the historical radial transport corridors
- Link key metropolitan major activity centres/precincts with each other, particularly via mass transit modes.
- In the absence of an integrated land use and transport for Victoria as required by the *Transport Integration Act 2010*, consider the roles and operations of all transport modes across Victoria's broader transport network, including, in the case of SRL East, of Moorabbin Airport.

Over the last 53 years, Melbourne has enjoyed the benefits of the 1969 transport plan and for even longer a series of metropolitan strategies that have delivered one of the world's most liveable cities.

COVID has provided changes and challenges for the future – across transport, planning and broader policy settings and project priorities.

I will now work through the matters raised in our submission, adding additional commentary as appropriate. I anticipate this will take around 20 minutes in total, with Peter Hill contributing as needed.



4. Integrated Strategic Planning needs to drive project development

While the concept of the SRL linking Cheltenham to Werribee announced prior to the 2018 State Election was somewhat of a surprise, TCPA (like other groups) was excited by the city-shaping possibilities and looked forward to contributing its ideas.

A truly integrated approach would undertake this process concurrently and iteratively to ensure the best outcomes for both the transport network and the communities reliant on those important precincts. However, our concerns remain particularly as we move into a post-COVID world. The associated uncertainties may affect project timing, design and deliverability in the short to medium term.

- Both the SRL Business Case and now the SRL East EES have leapt ahead of this planning approach and into the project itself and Planning Scheme Amendments.
- The decision made to proceed with the project was not based on a business case or cost-benefit analysis – these appeared after and were largely based on modelling that data and behaviour that predate the COVID pandemic.
- While the EES outlines “Precinct Ambitions” for each of the precincts around each station, these were to be addressed as part of the metropolitan regional planning frameworks identified in the *Plan Melbourne 2017-2050 Addendum 2019*.

It is somewhat astonishing that precinct planning is not part of the assessment.

Has the demand modelling affected project design and deliverability in a post-COVID world?

The demand modelling is based mainly on models which use historical observed data about quantitative travel movements and spatial distributions of economic activity and employment. However, the modelling was run prior to the COVID pandemic.

COVID has been a major catalyst for spatial (locational) changes in employment and study, facilitated by the rapid adoption of virtual private network (VPN) information technologies and related conferencing platforms, such as Zoom and Microsoft Teams. This rapid change supports remote working and studying from home and has seen an increased shift to regional cities, as discussed in the joint TCPA-RFI Discussion Paper, *Rail as a Catalyst for Regional Growth* (January 2022), especially those within a 160 km distance from Melbourne (Geelong, Ballarat, Bendigo and Latrobe Valley). (See: <https://tcpa.org.au/rail-as-a-catalyst-for-regional-growth/>)

Across Australia and in other countries, these hybrid working practices could take some years to form stable patterns.

The strategic goal of agglomerating jobs at and around the planned SRL stations in SRL Precincts may be challenged in the new post-COVID world. Like Melbourne’s CBD the types of employers will be mainly “information transacting” institutions and enterprises (e.g., banking and finance, H.O. administration, higher education, IT). Thus, the trend towards working and studying remotely, at least part of the week, will be a characteristic of jobs in the SRL precincts more than for employers elsewhere in metropolitan Melbourne.

- Businesses and organisations engaged in physical services and goods (e.g. manufacturing, transport, logistics and warehousing, agriculture, construction, food manufacturing and retail, medical, personal care, education, etc.) usually require larger lot areas away from the precinct centres. They are less attracted to high-rental/square metre sites in CBDs or major activity centre cores.



The COVID pandemic has raised the prospect of lower demand for office floor space per every 100 employees, say, due to remote working. Commercial rents in central Melbourne CBD and elsewhere across the metropolis could initially fall, then grow at slower rates than forecast before the COVID events. Such a trend would restrict the growth of demand for property in the SRL precincts and thus reduce the forecast potential for property value capture for taxation.

Key questions will emerge, including:

- What will be the key attractors for business executives making location decisions?
- What will be the intensity of agglomeration factors generally, and especially in the mid-urban SRL precincts?
- Does the current modelling need to be adjusted to respond to the changes wrought by COVID and the rapid uptake of VPN technologies supporting remote working?
- Does modelling done for the Plan Melbourne Addendum 2019 need further revision?

While not addressing these questions adequately, the business case appears to have taken the approach of making arbitrary numerical sensitivity changes to employment patterns and personal travel demand to test the impacts on benefit-cost ratios and look for breakeven levels.

- That approach can be useful, but how does it address the potential for changing patterns of work/study location decision-making by employers and employees in a post-COVID future?
- What further market research and analysis with business and property developers could be undertaken to answer the above?

Travel forecasts, modal splits and emerging technologies

Of the forecast 430,000 trips per day via SRL by 2056, some 200,000 will be trips switched from other public transport services, giving a net gain of 230,000 trips per day via public transport due to SRL. The business case (Table A – 44, pp 181-182) forecasts 27,813,000 total public transport and private vehicle trips per day in Melbourne metro by 2056.

Table A - 44: Public transport and private vehicle trips for Greater Melbourne, Core and COVID-19 sensitivity scenarios, 2056 (Option A – Cheltenham-MEL Airport completed 2053)				
	Base Case - Core	Base Case – Covid Sensitivity	Program Case Option A - Core	Program Case Option A - Covid Sensitivity
Private vehicle	26,803,000	24,983,000	26,205,000	24,503,000
Public transport	3,294,000	3,117,000	3,529,000	3,310,000
PT mode share	10.90%	11.10%	11.90%	11.90%
<i>Source: KPMG VITM modelling</i>				

It would appear that:

- SRL North & East trips would only be 1.55% of all Melbourne’s metropolitan trips in 2056! (i.e. 430,000 of 27,813,000 total).
- The net shift from car-based travel to public transport would be only 230,000 or 0.83% of all travel!



Surely, this cannot justify even the \$34 billion expenditure on SRL East in the short timeframes proposed commencing in 2022, particularly in light of budgetary re-prioritisations in the post-COVID recovery? The TCPA noted that other, much better-distributed public transport networks would capture more of the travel market, cost less and present a much lower project financial risk, such as the *Melbourne Rail Plan* (Rail Futures Institute, 2019)

SRL East modelling also tests potential consequences of higher prevalence of autonomous vehicles (AVs) and Electric Vehicles (EVs) and associated higher ride sharing use. These scenarios also include 20% to 48% increases in road capacity assumed to reflect higher efficiency of autonomous vehicles. SRL – Cheltenham to Airport boardings were reduced by between 5% and 10% in 2056 under these tested scenarios.

The analysis of and forecasts for increased AV use are based on the greater road traffic movement spatial efficiencies of AVs vs manual vehicles, i.e., greater road space vehicle densities for the equivalent road lane length, and number of vehicles travelling in a defined grid per hour of travel. However, the analysis appears silent about the potential for major personal time savings arising from use of AVs allowing the travelling workers to actually do their office work in-transit via Internet VPN technologies’ potentially saving such workers more than an hour per day on average.

- According to research by RMIT, in 2017, the average working-day commuting time to and from work was just below 70 minutes in metro Melbourne. Source: <https://www.rmit.edu.au/news/all-news/2019/jul/increasing-commuting-times>)
- What personal time budgets were used in the modelling to predict user travel via AV and not by SRL with connecting public transport or active transport?

5. Land use impacts

The TCPA submission to SRL East expressed concerns in relation to

- Plan Melbourne initiatives;
- Lack of consideration of alternative proposals to orbital rail;
- Appearance and impacts of key project structures; and
- EES’s apparent substitution of one type of value for a completely different one.

These concerns remain. The TCPA is concerned at the lack of progress on the *Melbourne’s Future Planning Framework* and its associated **land use framework plans (LUFPs)**.

Since 2017, development of the *Melbourne’s Future Planning Framework* has included the six draft land use framework plans for the Melbourne Metropolitan regions. The plans will help guide how growth, jobs, housing, infrastructure, major transport improvements and open space are managed at a regional level over the next 30 years.

In 2019, an addendum to Plan Melbourne, *Plan Melbourne 2017-2050 Addendum 2019*, was released. At page 7, the addendum states “*The land use implications of Suburban Rail Loop will be reflected in more detail in the relevant metropolitan regional land use framework plans (action 1 in the Plan Melbourne implementation plan)*”.

The Draft LUFPs were exhibited in mid-2021 and were due to be finalised in “early 2022”. The TCPA lodged a submission in October 2021. (See <https://tcpa.org.au/wp-content/uploads/2021/10/TCPA-submission-Melbournes-Planning-Framework-Draft-LUFPs-24102021-1.pdf>)

- Page 3 of that submission, when discussing 20-minute neighbourhoods, refers to the need to “*Consider LUFP models and implementation strategies in the event that the Suburban Rail Loop (SRL) does not proceed, and is substituted by alternative public transportation and land-use clustering structures.*”



Here we are in May 2022, but the *Melbourne's Future Planning Framework Engage Victoria* website now refers to a more open-ended "2021-2022" finalisation and the TCPA has yet to receive feedback on its submission (apart from acknowledgment of receipt).

It is to be hoped that the Minister for Planning will consider the submissions to both the SRL East EES (and planning scheme changes) and *Melbourne's Future Planning Framework* at the same time when making his decisions on both (as happened in 2008 with the *Melbourne 2030: a planning update - Melbourne @ 5 million* and *The Victorian Transport Plan*).

6. Land uses patterns along the SRL East corridor

The TCPA submission focussed on the precincts rather than the overall tunnel routes. TCPA has no further comment to add in relation to the Cheltenham, Clayton, Monash, Glen Waverley, Burwood and Box Hill precincts except a brief note on the challenges related to their sizes

Each of the designated precincts and their 1.6 kms (1 mile) radii around the six proposed SRL East stations would have an area of about 8 km² – more than 6 times as big as the central Melbourne "Hoddle grid" – and for all stations more than 36 Hoddle grids of central Melbourne!

- Is it feasible to plan for, much less redevelop, the equivalent area of 36 CBDs?

The current business case strategy for creating these 1.6 km radius SRL precincts appears greatly excessive when compared to long term land demand. The SRL Authority may well discover that smaller precincts would be less wasteful and disruptive of the existing urban environments and that any value uplift could be more focussed. Lessons could be learned from the Docklands urban renewal precinct, at 1.9 km², and the Fishermans Bend urban renewal precinct, at 4.8 km² or other precincts focussed around transport infrastructure (e.g. Melbourne Airport's Landside Main Precinct which includes key road and rail access and interleaved commercial developments)

7. Draft Public Open Space Framework

The concerns TCPA raised previously remain, i.e.:

- Loss of public open space for which no replacement was to be provided;
- Need to meet the objectives of the Chain of Parks; and
- Temporary long-term loss (10 years) of space at Box Hill Gardens

8. Moorabbin Airport

The TCPA submission addressed

- Provisions of *Clause 18.02-75 – Airports and airfields* of the Victoria Planning Provisions (VPP), particularly as it refers to Moorabbin Airport operations;
- The *National Airports Safeguarding Framework* and its associated *Guidelines A – I* (collectively referred to as NASF);
- The *Moorabbin Airport Master Plan (2015)* and the *Preliminary Draft Moorabbin Airport Master Plan (2021)*; and
- Potential risk to the Stabling Facility resulting from an aircraft incident.

The metropolitan Green Wedge policy allows for major infrastructure that supports urban areas. As the SRL East EES notes, Moorabbin Airport and its northern flight paths sit within the South East Green Wedge.



The TCPA noted that, while aircraft noise and protection of airspace were addressed, the EES had not addressed all aspects of the NASF, in particular its Principles and Guidelines C (wildlife strike), E (pilot lighting distraction) and G (Communication, navigation and surveillance)

The recent release of both the *Melbourne Airport Environs Safeguarding Standing Advisory Committee Part B Final Report* (November 2021) and the associated State Government Response, *Safeguarding Victoria's airports* (April 2022) reinforces the need for developments and airports to address NASF when considering developments on and in the vicinity of airports.

While mercifully rare, there have been three incidents in the vicinity of the stabling facility site since 2010 that should now trigger consideration of NASF *Guideline 1: Managing the Risk in Public Safety Areas at the Ends of Runways* in both the SRL East EES and Moorabbin Airport's current master planning process.

- **June 2021** The pilot was seriously injured when his aircraft had been conducting circuit operations at Moorabbin Airport and collided with terrain approximately 1 km north of the airport at Heatherton – the Heatherton Sands site immediately to the north of the proposed facility.
- **June 2019** Two men walked away with minor injuries after their plane crashed into the Capital Golf Course in Heatherton, which is just to the north of the airport and south of the proposed stabling yard.
- **April 2010** 72-year-old pilot was trying to land his Piper Warrior craft when the plane clipped trees and landed at the Capital Golf Club course.

The Federal Minister for Infrastructure, Transport and Regional Development and Deputy Prime Minister, Hon Barnaby Joyce, has recently refused to approve the Preliminary Draft Moorabbin Airport Master Plan (2021). Moorabbin Airport has 6 months to respond to his concerns and submit a new draft.

This creates the opportunity for the SRL East project to undertake the extra consultations that the TCPA recommended in its submission and to ensure that it can fully address NASF – if acted upon quickly.

9. Critical gaps in EES and Planning Scheme Amendment

The concerns and gaps TCPA raised previously remain. There is no further comment.

10. Conclusion

In light of the serious gaps in primary market research and thus modelling for future land use activity (employment, residency, and travel by SRL) coupled with the current era of uncertainty in trends and rapid technological change, the government must:

- Conduct exhaustive planning research based on reviewed current models and expand to draw in primary market research into corporate outlooks, and population behaviours (changes in working, and travel methods)
- Conceive and investigate alternative land use and transportation strategies that have lower risk and broader and better distributive spatial patterns. The SRL's major weakness and program risk of failure is its "all or nothing" strategy.



As outlined in the T CPA submission, the T CPA maintains that

- The project is premature and should not proceed until more detailed strategic planning for the station precincts is undertaken to ensure that the best outcomes can be achieved for both the precincts and the transport network.
- The Independent Advisory Committee should recommend to the Minister for Planning that the EES not be approved and that the Planning Scheme Amendment be abandoned.

Thank you for hearing us today.

Marianne Richards, President, and

Peter Hill, Hon Secretary, Town and Country Planning Association Inc.

Monday, 2 May 2022