



*Town and Country Planning Association
Incorporated*

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

Registration no. A0031095J

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

16 December 2021

Ms Kathy Mitchell AM
Chief Panel Member and
Chair, SRL East Link Inquiry and Advisory Committee
Planning Panels Victoria
1 Spring Street,
Melbourne, Victoria, 3000
Email: planning.panels@delwp.vic.gov.au

Dear Ms Mitchell

Submission to the Suburban Rail Link Project Environment Effects Statement and Planning Scheme Amendment

The Town and Country Planning Association (TCPA) advocates integrated planning of land use and transport for ecological sustainability and a healthy living environment. The TCPA is a non-profit public organisation, established in Victoria in 1914, and is independent of any party political organisation.

Please find on the following pages the TCPA's public submission in response to the *Suburban Rail Link East Project Environment Effects Statement* (November 2021) (the EES).

In preparing this submission the TCPA also considered the matters outlined in:

- *Suburban Rail Loop Strategic Assessment* (Development Victoria, released 1 January 2021)
- *Scoping Requirements for Suburban Rail Link East Environment Effects Statement* (Department for Environment, Land, Water and Planning, June 2021)
- *Suburban Rail Loop Business and Investment Case* (Suburban Rail Loop Authority, August 2021)

The TCPA considers that:

- The EES requires more work to address some significant gaps and deal with other matters in more detail.
- 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 (IAC) should recommend to the Minister for Planning that the EES not be approved and that the Planning Scheme Amendment be abandoned.

Panel and Directions Hearings

In raising these concerns with the SRL East Project Environmental Effect Statement and its associated Planning Scheme Amendment, the TCPA would seek to present its concerns at an IAC Hearing. We would require no more than 30 minutes to make our presentation.

At this stage, the TCPA does not anticipate calling any expert witnesses and will be represented at the IAC 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

A handwritten signature in cursive script, appearing to read 'Peter Hill', written in black ink.

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



1. Introduction

The Suburban Rail Loop (SRL) project will deliver a new 90-kilometre orbital rail line, strategic land planning and development initiatives in SRL Precincts – the 1600m zone around stations. The project is aimed at contributing transport connections for a transport network expected to provide an extra 10.4 million trips per day and dwelling construction for a city of 8.8 million people in 2050, 1.5 million more jobs and 1.6 million more dwellings.

The SRL East is the first stage, intended to provide a rapid rail service through twin bore tunnels for 26 km from Cheltenham to Box Hill. Six new underground rail stations will be constructed at Cheltenham, Clayton, Monash, Glen Waverley, Burwood and Box Hill. The Emergency Support Facility is proposed in Mount Waverley and the Stabling Facility in Heatherton.

The Business and Investment Case found that SRL East, together with SRL North (Box Hill to Melbourne Airport) will deliver up to \$58.7 billion in economic, social and environmental benefits to the state, with a positive benefit-cost ratio (BCR) range between 1.1 and 1.7. Planning work will continue on SRL West, which will integrate with transport investments in the west, including Melbourne Airport Rail.

2. Integrated Strategic Planning needs to drive project development

The 2018 SRL Strategic Assessment considered the metropolitan need for orbital transport solutions and having looked at options across Melbourne’s inner, middle and outer suburban rings. It recommended further investigations for a middle ring corridor of interest to link NEICs, key major activity centres and specialised precincts and for the future development of those precincts.

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, it is of concern that:

- The decision to build the railway was not based on a business case or cost-benefit analysis, the business case being provided after the decision was made to proceed with the project.
- Both the SRL Business Case and now the SRL East EES have leapt ahead of this planning approach and into the project itself, outlining detail of tunnel alignment, station and stabling locations and construction/early works and a Planning Scheme Amendment to deal with approvals.
- While the EES outlines “Precinct Ambitions” for each of the precincts around each station, precinct planning is not part of the assessment.

3. Land use impacts

The assessments of land use impacts both by and on the Suburban Rail Loop project for both the EES and the draft planning scheme amendment are deficient for the following reasons.

3.1 The SRL Project and Plan Melbourne

The EES and the Explanatory Memorandum justify the SRL project as a key means of implementing Plan Melbourne.

Plan Melbourne 2017-2050 (Plan Melbourne) policies are used to justify the project, but the plan itself is not linked to the project. *Plan Melbourne* does not mention the project, nor does it contain an integrated land use-transport policy.

The strategic justification refers to government policies, including those in Plan Melbourne, but does not demonstrate that alternative projects could not achieve these policies and that these might not be preferable. Neither does it show that every element of the SRL project is necessary to construct a viable project.



Despite an addendum being added to Plan Melbourne to refer to this project, this is a project led strategy – the opposite to a properly strategically led project and justification.

Further, the responsible government transport and planning agencies appear to have played little, if any, part in the original decision to build, a governance model which specific SRL legislation will reinforce. The legislation gives control of redevelopment planning of all land adjoining the loop to the Suburban Rail Loop Authority (SRLA). The project and the SRL legislation proposes the redevelopment of activity centre locations for a 1.6 km radius.

3.2 Is the SRL project the best or only way?

The EES does not show that the SRL is the only or the best means of achieving a circumferential rail loop, or of enabling a city of a projected 8 million people to continue to function effectively.

The EES and the Explanatory Statement recognises that the project is city changing, “transforming Melbourne’s shape and growth trajectory” from a monocentric to a polycentric structure, fundamentally altering the ways people live, work and travel.

The project should be assessed against broad alternatives, such as the maintenance of a monocentric model, or alternative models to achieve a polycentric city, such as the one proposed by the Rail Futures Institute in *The Melbourne Rail Plan* (2019).

The Rail Futures Institute proposed a detailed proposal for a suburban loop of a very different nature, allowing a far more extensive coverage of suburban land at a substantially reduced cost.

For further information, visit:

- <https://www.railfutures.org.au/2018/09/the-melbourne-rail-plan-2019-2050/> or
- download the full report (PDF) https://www.railfutures.org.au/wp-content/uploads/2019/09/15329_MRP2050main_FinalPages.pdf

3.3 Appearance and impacts of key project structures

The appearance and impacts of key project structures are unknown and not assessed.

Urban design criteria are provided, but structure plan or final station designs or scale are yet to be developed.

Local councils and residents are excluded from final decision making on such matters under the governance and project approval model. Any approval would be for a project with unknown future features and impacts and which the current EES is therefore unable to assess.

3.4 EES substitutes one type of value for another

The EES substitutes one type of value for another. Each one substituted is unrelated to the one lost.

The alleged benefits of improved public transport provision is substituted for loss of open space, vegetation and biodiversity.

- Two key concepts are central to this substitution – ‘balance’ and ‘net benefit’ or ‘offsets’. Neither meets the commitments for replacement of the value lost with an asset of equal worth in both type and location.

Substitution cannot provide balance for a scarce or unique resource.

- A radically different type of value - improved public transport - cannot compensate for parkland lost in the construction of the project.
- It allows the calculation of claimed benefits to allegedly ‘offset’ impacts with different claimed benefits. This concept allows a loss to be allocated no value in comparison to an overriding alternative benefit, negating the need for a thorough assessment of alternatives or the attempt at replacement of the value lost with another of equal worth.



However, the project does not propose such replacement. Attempts to offset loss cannot replace the values destroyed. This principle can be illustrated through habitat loss.

- Newly planted vegetation cannot replace established vegetation with the existing range of biodiversity, aesthetic and landscape benefits. A total 410 trees would be removed from the Bayside/Kingston local government area, 515 trees from the Monash local government area and 441 trees from the Whitehorse local government area. Of 1,561 trees in the proposed stabling area, 252 will be removed.
- The assessment recognises that two threatened animals listed under the *Environment Protection and Biodiversity Conservation Act 1999 (Cth)* (EPBC Act) and the *Flora and Fauna Guarantee Act 1988 (VIC)* (FFG Act), the Grey-headed Flying-fox and Swift Parrot, may use trees; some common non-threatened fauna would be displaced directly by the removal of habitat. Powerful Owl and Grey Goshawk (listed as threatened under the FFG Act) may occasionally hunt at the proposed Stabling area and use mature trees for perching. Other animals are also likely to use mature trees. A total of 18 terrestrial species - one amphibian, 15 birds, two mammals and one aquatic species “had potential to be present” in this area. The assessment proposes that these animals can utilise other existing areas.

This assessment was a desktop assessment so may understate existing conditions.

4. Land uses patterns along the SRL East corridor

The SRL project will fundamentally alter the pattern of land use along the corridor and in activity centres

The impacts on land use patterns along the corridor and in activity centres are not stated, and the EES does not assess the impacts of such large scale redevelopment.

This is a major omission in a project which recognises that the project seeks to redevelop large areas of Melbourne to cater for future population growth, promote economic development and change travel patterns.

The assessment states that one of the project’s main aims is ‘enhanced redevelopment’ of activity centres and to unlock Melbourne’s middle ring and attract new businesses and investments. The nature and scale of such development are unknown. Impacts will be extensive, ranging from large scale relocation of communities and land uses, high rise development and other intensified uses, traffic impacts and altered modes of living and working for large numbers of people.

The EES is proposing that the project can proceed without making clear the nature and scale of development or assessing impacts. Such impacts are not mentioned in the land use components of the EES. Such an omission renders the land use assessment of the project unacceptable.

Some station sites proposed are located some distance from major retail, commercial, residential and educational facilities and employment locations, sometimes separated by major roadways, particularly at Monash, Cheltenham and Burwood. Considerable distances will exist between SRL station locations and some existing rail stations.

The proposed stabling facility lies outside the urban growth boundary in the Green Wedge A zone. The facility would be sited directly beneath a crucial intersection in the northern flight corridors serving Moorabbin Airport.

Many of our members have advised that they participated in stakeholder processes during the preparation of the SRL East EES and Planning Scheme Amendments. However, with the exception of the Chain of Parks in the South East Green Wedge, they are concerned that many of the issues they raised are not evident in the final documents or, indeed, in the Feedback Snapshot on the SRL East website. Some of these are outlined below.



Cheltenham

- The SRL Cheltenham needs to be better integrated with the Westfield Southland Shopping Centre and the existing Southland Station on the Frankston line. The proposed elevated pedestrian and cycle bridge may not be user-friendly, particularly at night.
- The SRL Cheltenham needs to be better integrated with the commercial precincts to the south and east of the shopping centre.
- Westfield Southland includes a two level airbridge spanning the Nepean Highway. There is no reason that the proposed station could not be similarly connected across Bay Road to the shopping centre.
- Loss of public open space at the Sir William Fry Reserve without any defined replacement in the area.

Had these matters been subject to a process that combined the overall precinct planning with the project planning and design, a more integrated or even different outcome would have been achieved. The outcome could have considered cost to the SRL East project against land value uplift in the precinct.

Clayton

- While the Clayton SRL station is relatively well laid out, given its “Hub” status, travellers swapping between the existing station on the Frankston line and the SRL will need to leave/tap off at one station, cross a road, enter a new station and tap on again. A design solution incorporating a validated ticket link does not appear to have been considered.

Monash

- The Monash station should be closer to the centre of the university campus and collocated with the existing university bus interchange off Wellington Road. This would potentially allow for a good connection to a future Rowville light rail.

A sentence buried in an EES technical report that suggested that, as well as serving the Monash NEIC business parks to the north and east of the university, the SRL station was intended to be a complement to the role of the Monash University’s bus interchange, not replace it. This should have been a headline statement for the Monash station, particularly in the Summary Report, as it would then have allowed a discussion on how the two would be linked with each other – including the role of active transport (walking and cycling/scooting are already prominent around the university).

Monash University is located at one of the highest points above sea level in Melbourne’s south-east and significantly higher (50 metres) than Clayton. Buried in the documents, this time in the SRL East Project Wide Map Book, the detail of and challenges for the rail alignment became evident. At the bus interchange the difference between natural ground level and the tunnel rail track is some 45 metres – 1 ½ times the depth of Flagstaff Station. The depth only becomes manageable at the proposed site. Again, having this message more prominent and in the Summary Report would have answered our members’ concerns.

Glen Waverley

- The SRL Glen Waverley station needs to be better integrated with the existing station on the Glen Waverley line. The existing station is relatively narrow and very congested during morning, evening and school peak periods. There is an opportunity to redesign both stations as part of an integrated station complex within a growing major activity centre.
- The SRL station needs to be better integrated with the retail and commercial precincts to the east with improved pedestrian flow.



Had these matters been subject to a process that combined the overall precinct planning with the project planning and design, a more integrated or even different outcome would have been achieved. The outcome could have considered cost to the SRL East project against land value uplift in the precinct.

Burwood

- The station should be relocated to the north side of Burwood Highway to better integrate with the Deakin University and schools located to the north and west and with the Burwood Highway tram corridor and stations.

The SRL East runs beneath the Gardiners Creek valley – albeit in a constructed drain on the south side of the highway. It is acknowledged that this may prove a challenge for a relocated station, but further investigation of this possibility should be undertaken.

Had these matters been subject to a process that combined the overall precinct planning with the project planning and design, a more integrated or even different outcome would have been achieved.

Box Hill

- The SRL Box Hill station needs to be better integrated with the existing station on the Lilydale/Belgrave line.
- The SRL station needs to be better integrated with the retail and commercial precincts and connected to the light rail terminus.

The areas around the existing Box Hill station have progressively redeveloped since Box Hill Central Shopping Centre was built over the station in the early 1980s. Recent decades have seen substantial development of residential, education and medical facilities. The shopping centre opened in late 1982 and might be anticipated to be upgraded in the next decade or so offering the opportunity for better integration with or connections to the SRL station.

Had these matters been subject to a process that combined the overall precinct planning with the project planning and design, a more integrated or even different outcome would have been achieved. The outcome could have considered cost to the SRL East project against land value uplift in the precinct.

Stabling Facility, Heatherton

The EES and Planning Scheme Amendment do not consider

- Loss of a significant part of the South East Green Wedge and habitat.
- All aviation safety risks, except for building height controls, as identified in the *National Airports Safeguarding Framework* and in Moorabbin Airport Master Plans (both the current 2015 and the 2021 Preliminary Draft master plan).
- Potential risk to the Stabling Facility resulting from an aircraft incident.

Key features of the Stabling Facility include:

- An office and Operational Control Centre
- Stabling to accommodate 30 trains
- A train maintenance facility for all SRL East requirements
- A test track for testing trains before they go into operation
- A power supply substation to provide power during construction and for the SRL East's long term operation

The facility is clearly crucial to the project and was considered with several other potential sites, but further investigation needs to occur to address the concerns raised. These are addressed in subsequent sections of this submission.



5. Draft Public Open Space Framework

5.1 Public open space principles

State and local planning policies seek to protect existing public open space and, where public open space is reduced due to a change in land use or occupation, to ensure that additional or replacement public open space of equal or greater size and higher quality is provided.

The project will result in the loss of open space at Sir William Fry Reserve in Cheltenham, Sinnott Street at Burwood and parts of the planned public open space for the proposed Chain of Parks in Heatherton.

However, for the following and other examples, equivalent new open space is not to be provided. The following actions are specified:

- *Sir William Fry Reserve*, Cheltenham: 4.82ha (56.5% of total area).
Provide alternative spaces and amenities to support community events and activities, such as farmers markets, prior to removal of existing facilities;
- *Chain of Parks*:
Work with City of Kingston, DELWP and other stakeholders to identify alternatives that continue to meet the objectives of the Chain of Parks concept.
- *Box Hill Gardens*: Temporary long term loss (up to 10 years) of 1.67ha (24.9% of total area).
 - Create an attractive edge to the construction site that minimises amenity impacts.
 - Restore existing park assets such as the looped trail and reinstate landscaping and trees to equivalent or better quality following construction.
 - Create an inviting and attractive restored space which responds to the cultural values of the local community.

Chain of Parks

However, the stabling facility is proposed to be sited on part of the proposed parkland the government has committed to establish a Chain of Parks. The land includes private land with a variety of land uses – a clean fill site, public open space and former land fill sites.

This regional parkland was first proposed in the 1971 Melbourne Metropolitan Plan and was pursued initially by local governments during the 1970s. The site is subject to a Public Acquisition Overlay to enable it to be acquired. The assessment recognises that the project “is not consistent with State and local planning policy in relation to the Chain of Parks proposal”, and that it would detrimentally affect visual amenity. However, it argues that preservation and upgrades of existing reserves, maintenance of biodiversity and further pedestrian and cycling connectivity would compensate for the abandonment of the commitment to the Chain of Parks in this area.

- Again the assessment argues that other benefits would compensate for the loss, further contradicting the commitment for replacement.

A Stabling Facility in the South Eastern Green Wedge is inconsistent with Kingston City Council’s Open Space Strategy and Council’s vision for the implementation of the Chain of Parks policy objective within Clause 19.02-6R of the PPF.

- It is not consistent with the Green Wedge Management Plan for the area.

The EES outlines specifically how State and local planning policy in the Planning Policy Framework of the Kingston Planning Scheme reinforce the role of the Chain of Parks proposal to:

- Develop open space networks in growth areas and in the surrounding region of metropolitan Melbourne, where existing open space is limited and demand is growing, including: Chain of Parks – Sandbelt (Clause 19.02-6R *Open Space – Metropolitan Melbourne*)



- Avoid development which might prejudice the achievement of long-term strategies for completed extraction and land filling sites such as open space and other productive after-uses (Clause 21.08-2 *Economic Development – Industry*)
- Progress the Sandbelt Open Space Project and promote the development of a series of connected parks providing for a wide range of regional and local recreation opportunities within a quality environment (Clause 22.01 *Sandbelt Open Space Project*)
- Provide for open space links and opportunities for recreation (Clause 22.02 *South East Non-Urban Area Policy*)

The Department of Environment, Land, Water and Planning (DELWP) released its Open Space Strategy, *Open Space for Everyone*, in April 2021 to guide all levels of government in the planning, management, and delivery of quality open space networks over the next 30 years. The Open Space Strategy includes an initiative for DELWP to deliver the Sandbelt Parklands by progressing the next stages of land acquisition for a chain of parks connecting the existing Karkarook and Braeside parks. Construction and operation of the Stabling Facility could comprise the future of the Chain of Parks in this location.

Yet, the EES proposes that the loss of proposed open space with far reaching impacts on the entire Chain of Parks initiative could “enhance existing, and create new linkages”. It refers to the Urban Design Strategy which:

- includes a place specific outcome of “a stabling facility that is well-integrated with the surrounding area and responsive to the emerging ‘green’ character of the Chain of Parks”; and
- seeks to ensure the Stabling Facility positively contributes to the public realm”.

In response, the Kingston City Council has considered that the only way this might be achieved would be to roof a significant portion of the stabling facility to provide for the long term connection in the Chain of Parks and viability of the Green Wedge.

6. Moorabbin Airport

Moorabbin Airport is located south of Centre Dandenong Road. Its flight path and aircraft noise impacts affect both the Cheltenham SRL precinct and the Stabling facility at Heatherton.

The EES and the Planning Scheme Amendment do not address:

- Provisions of *Clause 18.02-7S – 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.

6.1 Victoria Planning Provisions

VPP *Clause 18.02-7S – Airports and airfields* contains the following objective and strategies relevant to Moorabbin Airport.

Objective

“To strengthen the role of Victoria's airports and airfields within the state's economic and transport infrastructure, facilitate their siting and expansion, and protect their ongoing operation.”



Strategies

- *Protect airports from incompatible land uses.*
- *Ensure that in the planning of airports, land use decisions are integrated, appropriate land use buffers are in place and provision is made for associated businesses that service airports.*
- *Ensure the planning of airports identifies and encourages activities that complement the role of the airport, and enables the operator to effectively develop the airport to be efficient and functional and contribute to the aviation needs of the state*
- *Recognise Moorabbin Airport as an important regional and state aviation asset by supporting its continued use as a general aviation airport, ensuring future development at the site encourages uses that support and enhance the state's aviation industry, and supporting opportunities to extend activities at the airport that improve access to regional Victoria*
- *Plan for areas around all airfields so:*
 - *Any new use or development that could prejudice the safety or efficiency of an airfield is precluded.*
 - *The detrimental effects of aircraft operations (such as noise) are taken into account in regulating and restricting the use and development of affected land.*
 - *Any new use or development that could prejudice future extensions to an existing airfield or aeronautical operations, in accordance with an approved strategy or master plan for that airfield, is precluded.*

Policy documents

Consider as relevant:

- *National Airports Safeguarding Framework (as agreed by Commonwealth, State and Territory Ministers at the meeting of the Standing Council on Transport and Infrastructure on 18 May 2012)*

The EES and Planning Scheme Amendment address areas in the vicinity of Moorabbin Airport affected by aircraft noise impacts (Airport Environs Overlay) and building height restrictions (Design and Development Overlays), but have not considered the full scope of NASF. Aside from these, the guidelines related to aviation safety have not been considered in the EES or Planning Scheme Amendment.

For further information on the airport planning in Victoria visit:

- Victorian Government, Department of Environment, Land, Water and Planning)
<https://www.planning.vic.gov.au/policy-and-strategy/airports-and-planning>

6.2 National Airports Safeguarding Framework

Both the Cheltenham SRL precinct and the Stabling Facility will be affected by aircraft operations and aviation safety guidelines. The stabling yard is located directly beneath the intersection of the northern approach and training circuit flight paths. While rare, recent aviation incidents at Moorabbin Airport have involved aircraft approaching, rather than departing, the airport.

The NASF consists of the following:

- *Principles for National Airports Safeguarding Framework*
- *Guideline A: Managing Aircraft Noise*
- *Guideline B: Managing Building Generated Windshear and Turbulence*
- *Guideline C: Managing Wildlife Strike Risk*
- *Guideline D: Managing Wind Turbine Risk to Aircraft*
- *Guideline E: Managing Pilot Lighting Distraction*
- *Guideline F: Managing Protected Airspace Intrusion*
- *Guideline G: Communications, Navigation and Surveillance*



- *Guideline H: Protecting Strategically Important Helicopter Landing Sites*
- *Guideline I: Managing the Risk in Public Safety Areas at the Ends of Runways*

NASF was first agreed by Commonwealth, State and Territory Ministers at the meeting of the Standing Council on Transport and Infrastructure on 18 May 2012 and has been updated and agreed by the Standing Council since.

While the EES and Planning Scheme Amendment addresses areas affected by aircraft noise impacts (Airport Environs Overlay) and building height restriction (Design and Development Overlays), there has been no assessment under NASF, in particular:

- *Principles for National Airports Safeguarding Framework*
- *Guideline C: Managing Wildlife Strike Risk*
- *Guideline E: Managing Pilot Lighting Distraction*
- *Guideline G: Communications, Navigation and Surveillance*

For further information visit:

- Australian Government, Department of Infrastructure, Transport, Regional Development and Communications
<https://www.infrastructure.gov.au/infrastructure-transport-vehicles/aviation/aviation-safety/aviation-environmental-issues/national-airports-safeguarding-framework>

6.3 Moorabbin Airport Master Plan

Both the current *Moorabbin Airport Master Plan* (2015) and the *Preliminary Draft Moorabbin Airport Master Plan* (2021) outline a response to NASF and provide details of the flight path usage for all the airport's runways.

The Airport Master Plan establishes a clear vision for aviation and non-aviation activities at the Airport. The Master Plan is revised every five years as governed by the *Airports Act 1996* (Cth).

The current Master Plan was approved by the then Minister for Infrastructure and Transport on 2 August 2016 and will remain in force until the new plan is approved.

Given the Preliminary Master Plan was exhibited within the last 6 months, it is surprising and disappointing that the SRL East project has not involved itself with the airport's planning.

For further information if interested visit:

- <https://www.moorabbinairport.com.au/about-us/planning>
- *Moorabbin Airport Master Plan, 2015*
<https://www.moorabbinairport.com.au/-/media/files/sites/moorabbin-airport/corporate/master-plan-2015/moorabbin-airport-final-2015-master-plan-website.pdf> and
- *Preliminary Draft Moorabbin Airport Master Plan (April 2021)* awaiting Commonwealth decision by February 2022
<https://www.moorabbinairport.com.au/-/media/files/sites/moorabbin-airport/media-centre/moorabbin-airport-master-plan-2021-preliminary-draft.pdf>

6.4 The project and aviation operations risk

The EES does not discuss the risk to SRL East operations in the event of an aviation incident at the stabling yards. With the mix of training and regular general aviation there are increased risks, low likelihood, but serious consequences, given the critical activities undertaken and power infrastructure at the Stabling Facility.



6.5 Further consultation is required

Before the EES and Planning Scheme Amendment can proceed urgent consultation with Moorabbin Airport Corporation, Airservices Australia and the Civil Aviation Safety Authority should be undertaken and their views reported. At present none of these appear on any SRL East consultation list.

7. Critical gaps in EES and Planning Scheme Amendment

There has been:

- No analysis of the relative priorities for and nature of development of each of the precincts, in particular the best features of transit-oriented design, In particular, there is no needs and demand assessment for development in each of the precincts or of how the SRL East would contribute.
- No assessment of SRL East options – only the project versus a “do nothing” scenario. This was the approach taken with the Melbourne Airport Rail Link in the late 1990s/early 2000s – the Broadmeadows alignment. The associated Planning Scheme Amendment was rejected and the proponent (State Government) sent away to undertake a new process which considered 3 options as well as “doing nothing”. That lesson does not appear to have been learnt or has been forgotten!!
- No demonstration of how the SRL East would integrate with and complement the current and future subregional transport networks. Also of concern is that there does not appear to be any reporting on the views of the DOT/PTV network planning teams. We may have to await the publishing of any DOT submission or even a public hearing to learn of its views.
- Failure to ensure that SRL East facilities are integrated with existing radial rail corridors to allow “platform-to-platform” transfers, e.g. as proposed in the Metro Tunnel Project CBD stations.
- No demonstration of how the SRLA will structure and conduct itself and engage other agencies and the community to address all of the above – except a vague commitment to do it at some point.

8. Conclusion

- 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.

END