
Request to be heard No - but please e

Full name: Chen Ma

Organisation:

Affected property: [REDACTED] Box Hill, VIC 3128

Attachment 1: <https://engage.vic>

Attachment 2:

Attachment 3:

Submission:

Dear Officer

I own and live in an apartment in the building of [REDACTED] BOX HILL VIC 3128, one of the properties to be acquired and demolished for the SRL Box Hill station based on the current proposed design. I am also the owner's corporation committee member of the building since 2019, and held the position of committee secretary from September 2019 to October 2021.

Overall, I am a supporter of infrastructure developments. Infrastructure is a key driving force of local and state economy. And the importance of this public transportation project, to Whitehorse LGA, to Melbourne, or to Victoria, is unquestionable. However, I have to make this submission to express my concerns, some serious concerns arisen from the current design proposal by SRLA (option 3) for the SRL Box Hill Station.

This submission will focus on proposed SRL Box Hill Station, and will be discussing the following aspects:

1. Impact to affected home owners
2. Impact to local residents
3. Other design options
4. Summary

1. Impact to Affected Home Owners

As explained in the introduction, I live in the building of [REDACTED] BOX HILL, which is to be acquired based on the current proposed design by SRLA (option 3). Before I express my opinion, please find the quote from the EES for assessment of the potential acquisition.

"Up to 108 residential properties. The relative vulnerability of these households to impacts of acquisition differs significantly based on their duration of tenure, housing type, age and level of need for assistance. These residents are likely to have a higher dependence on proximity to retail services, public transport and medical facilities and loss of their dwelling may adversely impact their health and wellbeing. However, the assessment determined that depending on the different householders requirements, these households would likely be able to secure an alternative housing in proximity to the medical precinct or retail area. For households living in apartments, it may become difficult for everyone to remain in the suburb due to supply, with some potentially having to secure a dwelling elsewhere."

1) Acquisition Compensation

After consulting with lawyers, I learned that the compensation is regulated by the *Land Acquisition and Compensation Act 1986*. The compensated amount is based on market value of the property, with up to an additional 10% solatium, plus cost of relocation.

Now looking back at my property. I bought the property in 2016 for [REDACTED] as an off-the-plan apartment. I moved in when it settled in June 2017. It is a two-bedroom apartment, just over four years old since constructed. The estimated market value now is around \$600k to \$650k. I expected a market value decline when I bought the property as off-the-plan. But it was never an issue at that time. Because I planned to live here for many years to enjoy the many other great features of this property. There was no plan to sell in foreseeable future, and the decline in market value will never be realised.

However, this has been my headache since I learned about this project and the proposed acquisition, as I am facing a potential \$100k to \$150k capital loss on my home. I am sure that many other lot owners are sharing the same concern, as many of them are first-hand owners like me who bought the apartment as off-the-plan. The EES states *"The relative vulnerability of these households to impacts of acquisition differs significantly based on their duration of tenure, housing type, age and level of need for assistance."* But I have to make a correction here, 102 of the 108 homes to be acquired is in the same building, and shares the same housing type and similar tenure.

Many owners, including myself, have shared this concern in multiple information sessions with SRLA. And I do not see it addressed or being considered in the EES.

No matter how small or how large is the capital loss, these are people's hard earned money. People save by years to buy a property, and just to be stripped away by the acquisition.

2) Replacement Property

Before I dive in to this topic, here is a brief summary of some features of my apartment:

- 2 bed 2 bath 1 car space;
- Mid-rise, only 8 levels; 102 residential units;
- New, only 4 years since constructed;
- Internal living area 86 sqm, plus two balconies 17 sqm, total size 103 sqm;
- A storage room, approximately 9sqm in area, or about 24 cubical meters;
- 2.7m ceiling height; plenty of built in storage;
- In Box Hill High School Zone;
- 5 min walk to Box Hill train station, or 2 min if running;
- 1 min walk to Box Hill Garden;
- Needless to say about all other amenities in Box Hill.

I have looked online for apartments we could potentially buy. None would fit the above criteria. Not even a close one. Most established apartments are older, and way smaller. Most two bed two bath apartments are under 75sqm internal plus a balcony under 10sqm, let alone a significant shortage of storage spaces.

One of the reasons that it is so hard to find a comparable replacement property, is that this building is so well designed, one of the best in the area to my opinion. One of my neighbour also said that they been looking to buy for many years until they found this one. And this is also the reason I bought this apartment to be my home.

Some of the new off the plan apartments in the area have relatively better design, but they are generally very expensive, most are over \$900k for an apartment comparable to mine. Houses and townhouses are also out of consideration due to price.

Plus, considering the potential loss in the compensation payout, it will really hard for me to find a suitable property in the area. And practically I may have to move very far away based on what I have left after paying out the [REDACTED] mortgage.

In short, I could be forced to downsize, or move far away, or go back to renting. I don't think I am the only one facing these difficulties. And I don't think it is fair for the home owners who gave up their home for the greater good to be treated like this, suffering losses and not enjoying the benefit of the project. Again, in the EES, it simply states that the owners are likely to secure an alternative housing or move away. I could not see diligence or care were observed from this impact analysis.

3) Mental Stress

Ever since I learned that my home may be acquired for the project, I became very stressed. Apart from the issues stated above, I am also deeply troubled by the uncertainty. I don't know if I will have a home in a couple of years' time. I don't know where will I live. Me and my wife planned for kids earlier and we have to reconsider, as we don't know where will the kid live and where could the kid go to school. Nothing is certain, everything is out of my control, and no plans can be made. Not a single night that I don't worry about these problems. I lost some sleep and have to get sleeping pills from doctors. I am more composed now and can live normally. However, the stress is still heavy and real.

The point is, the social impact has already taken effect. Regardless of what is the outcome, people's lives have been affected since we got the Notice of Intention to Acquire. This is something that was not included in the EES. And the SRLA failed to consider for most affected people.

The financial impact from the acquisition, the practicality for home owners to find a suitable replacement property, and the mental stress to go through all of these even the project design is not finalised. These are life changing problems imposed on over a hundred households. And there were not enough considerations for this most vulnerable group.

2. Impact to Local Residents

This section will focus on the impacts to the surrounding areas and residents.

1) Box Hill Garden

Under the current proposed design by SRLA (option 3), part of Box Hill Garden will temporary unavailable including the running track. It will also reduce available parking for people visiting the park. I want to emphasise that this Garden is a life routine for many people, and many families, either from Box Hill or from other nearby suburbs. The extent of impact and resulted inconvenience could be more than what was addressed in the EES.

2) Noises

Under the current design (option 3), the station construction site will be surrounded by multiple apartment buildings with extremely close proximity. This may include 1 Elland Avenue, 5-7 Irving Avenue, 710 Station Street, 8 & 10 Bruce Street. There could be hundreds of units in those buildings.

During the construction, the residents of these buildings will suffer from significant construction noise for years. The study in the EES is based on A-weighted equivalent noise level for a large area in Box Hill. Although it is weighted, the extreme noise experience of close residents is not considered in the EES.

Post construction, the nearby residents may still be affected. Currently this area is a quiet residential area. This was designated for mid-rise low density residential living. Once the project is completed, this will become the centre of all actions. The original designs of these buildings may not fit to the new characters of the locale. The underground train may also affect people in close by buildings. The EES studies show that vibrations may be perceptible for nearby residences. Ongoing life interruption to the residents have not been given enough consideration.

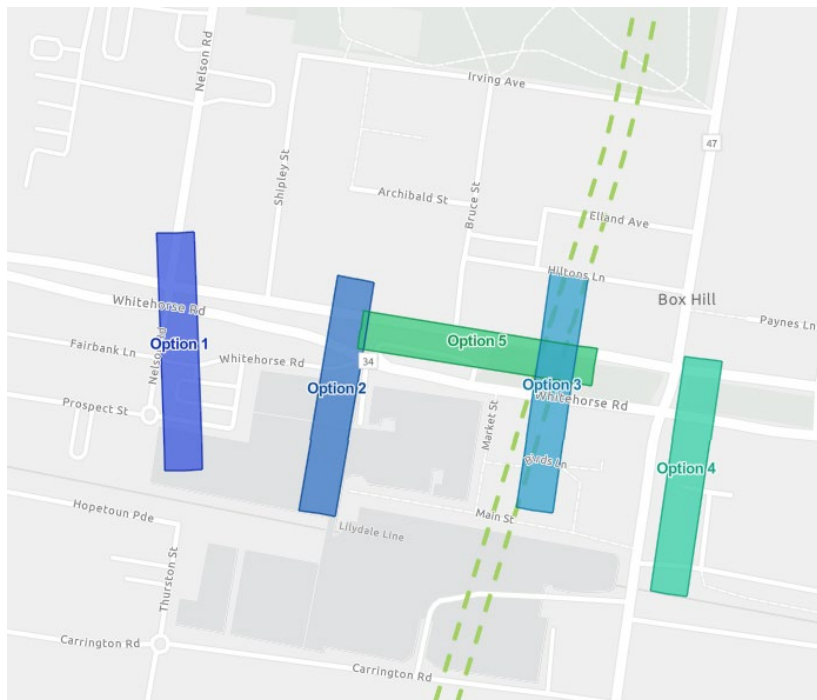
The ongoing operational noises will also affect the residents. Complying with the noise limit doesn't really mean that people will be comfortable with it.

3) Fire Safety

Under the current design (option 3), not sure if there is enough space for nearby apartments to have a safe gathering area.

3. Other Design Options

This section will discuss some personal opinions on other design options. The below is taken from the EES online display.



1) Option 1

The location is close to high rise buildings and relatively far from the existing condition. Personally I don't believe this is ideal.

2) Option 2

The location is ideal, as it merges with the existing station and can form part of the existing shopping centre. It also does not have any residential properties close by.

To my knowledge there is an existing development application by Vicinity Group to upgrade the Box Hill Shopping Centre and potentially build a new residential tower. The SRL project and the development may be able to coordinate and collaborate. There are potentials for more parking and more commercial spaces if developed properly.

3) Option 3 – Currently Proposed by SRLA

I am strongly against this design given all the reasons stated above.

4) Option 4

This location is also very suitable. The distance to the existing station is acceptable. And the existing commercial strip could be redeveloped post project completion. No residential properties in the immediate proximity.

5) Option 5

The location is great as it is close to everything, connects the existing station and tram station, and does not take many commercial or residential properties. The only challenge may be that the orientation is not aligned to north-south.

4. Summary

Much has been explained and mentioned. Here is a brief summary.

For the home owners facing compulsory acquisition, like myself, could lose a significant amount on the property. There will also be difficulties finding a comparable replacement property. We may be forced to move away from the area or move to a very small home. If the proposed design is approved, I will be asked to lose my home, and to lose a lot of money, and to move to a worse property or far away, and to not be able to enjoy the benefits of the growing Box Hill Area due to the project that kicked me out, and to have suffered all these mental stress for years and for nothing, and all at the same time. This is way too much to ask for a normal individual like me, or like any of my neighbours in the building.

In my view, the SRLA has not put enough consideration on **people** in the EES. Under the current design proposal, the impacts to the acquisition home owners could be devastating. The residents in the nearby buildings will also be heavily affected. The SRLA were not paying enough attention to the lives of these many hundreds of people, including mine.

People is what made us strong and prosper. People should be among the top priorities. People should be looked after, not ignored or dismissed.

Overall, I am strongly against proposed design (option 3). I strongly recommend that the proposed station location could be reconsidered, with more diligence and care for the people.

Request to be heard Yes

Full name: LI WAH YING

Organisation:

Affected property: [REDACTED] Box Hill 3128

Attachment 1: <https://engage.vic>

Attachment 2:

Attachment 3:

Submission:

Planning Panels Victoria
srl.iac@delwp.vic.gov.au

Dear Madam/Sir,

Project: Suburban Rail Loop
Property: [REDACTED], Box Hill
Authority: Suburban Rail Loop Authority

I note that at this stage the Suburban Rail Loop Authority ("**the Authority**") has earmarked the Property for a stratum land acquisition.

I have been informed by our neighbour, [REDACTED], that their property is likely to be acquired for Stage One of the Project as per the **enclosed** letter. I as one of the unit owners at the Property, feel so stressed and disappointed to know that our building is not being acquired at this stage and that there may even be tunnels under our Property. I welcome the Suburban Rail Loop Project for the community of Box Hill, however I also believe that our Property ought be fully acquired rather than a stratum land acquisition and I would like to outline our concerns below:

1. Loss of Amenity

The EES states that community connectivity may be affected during construction through changes to neighbourhood character and community access, potentially increasing stress and anxiety for some members of the community. The EES acknowledges that the construction of the Project will result in a temporary impact to public green spaces which may also impact the health and wellbeing of the community.

I have been living here since 2016 and we are fortunate as property owners to enjoy the existing natural and landscape views of [REDACTED], Box Hill. This street is a residential area and I cannot accept that [REDACTED] will be entirely gone and a new railway station will be built on the property instead.

The EES identifies that some dwellings and recreational facilities adjacent to the construction sites would temporarily experience construction noise affecting amenity of residents and discouraging the community from using these facilities. The station will be so close to our building (ONLY 10 metres away), so we can no longer have a peaceful environment to enjoy due to additional noise and flow of people every day. I do not want to live right next door to a railway station, especially during the COVID pandemic.

2. Concerns regarding building safety/structure and potential financial burdens

The EES states that ground movement due to subsurface activities is an expected outcome of any tunnelling project. If left unmanaged, ground movement has the potential to impact assets such as buildings, infrastructure and utility assets above, or in proximity to, the Project alignment. Although limited ground movement is expected from excavation works conducted for construction of the Project, having tunnels run under our Property may cause potential building cracks.

The effect of vibrations and the impact this may have on the foundation of the building in the long term is severely concerning. We have a car stacker system under the basement level and have concerns about the potential hazards the tunnel may cause. Although theoretically such risks may be little, it cannot be 100% eliminated or guaranteed as the EES identifies that some degree of settlement of the ground above or in proximity to the Project alignment is expected from underground works associated with the Project.

The EES also states that:

- predicted impacts from ground movement at the tunnel section in the Whitehorse local government area would be negligible to minor with aesthetic and superficial effects only;
- moderate ground movement impacts were modelled for a 340 metre section of Kingston Road, a 60 metre section of the Dingley Bypass and two sections of Clayton Road (85 and 55 metres) for the tunnel section in the Kingston local government area; and
- monitoring for potential structural damage may be undertaken to identify if any remedial works, such as reprofiling of the road surface, are required.

If any issues occur, owners will be faced with a number of risks, including taking on liability for the safety of the building which may also have huge financial burdens if anything goes wrong with our building. If this situation does occur, owners will have to hire a third party engineering company to identify the issues at our own cost and get someone to repair and rectify the issue as well. Additionally, the premium of strata insurance is also likely to increase. The original builder of the building may refuse to repair cracks and we are concerned that the entire warranty (which is currently in place until 2026) may be void due to the tunnels underneath the property. Owners do not want to be placed in an awkward position between the builder and the Authority. We simply cannot afford this.

3. Impact during demolition and construction

All kinds of problems may occur during construction which may affect local traffic flow, access to local areas, changes in active transport routes and

changes in safety for road users, pedestrians and cyclists. The entire project is expected to take a very extensive time of up to approximately 7 years to construct and factors such as noise and dust during the demolition of our neighbouring property, [REDACTED], will be felt by all owners of the property.

I note that construction noise levels are generally expected to comply with construction noise guideline targets. However, as identified in the EES, there may be times that construction noise may exceed appropriate construction noise benchmarks developed in accordance with EPA Victoria Publication 1834 Civil Construction Building and Demolition Guide, and the Project-specific Residential Support Guidelines. Predicted exceedances of noise benchmarks are typically associated with site establishment works which may require the short term, intermittent use of a hydraulic hammer. The EES also states that construction works at above-ground locations would typically only occur during the day (Normal Working Hours) to prevent interfering with people's evening and night time amenity. However, many of us work from home during the pandemic and for the foreseeable future, therefore I require a peaceful living environment to look after our mental health.

The EES states that there may be occasional days where residents generally within 50 to 100 metres of the station construction sites and 100 to 200 metres of the Stabling Facility experience dust settling on surfaces. Being located so close to the new station, we do not want our cars and building to be impacted by this dust and would rather be required to relocate prior to construction starting.

Further, the EES identifies the SRL station at Box Hill has a higher air quality risk profile due to the distribution and proximity of a number of residential towers and other sensitive receptors to the construction site. The predictive modelling concluded that even with implementation of conventional and proven controls, the incremental concentrations contributed by the Project are potentially quite large compared to the background concentrations at this location. Although practicable measures such as a shed over the spoil stockpile and partial decking over the station box excavation near sensitive receptors, demonstrated that a significant reduction of incremental contributions could be achieved and impacts would be low, I would rather the Property be acquired given that I am at higher risk residing in a residential tower.

4. Reduction of value of our property

Obviously, our property may be significantly devalued compared to other similar buildings at Box Hill that do not have a tunnel running underneath the building. You can appreciate that some people would prefer to purchase or rent a property without tunnels underneath. Our land will also lose its value if it cannot be developed for a high rise building in the future due to the tunnel. The EES states that development controls are proposed to be applied through a Specific Controls Overlay (as part of the Planning Scheme Amendment) to

protect underground (tunnel) infrastructure from future development (for example proposed basements that may be too close to the tunnel or multi-storey development that may increase the load on the tunnel). As a result, the implementation of the Overlay would result in new planning permit triggers within the Overlay boundary for certain types of development that could potentially affect the Project.

Another factor is also the building's proximity to the new station. Although some may enjoy the easy access to the station, there are some people (including some of our owners) who do not wish to live so close to the station for a number of reasons, including safety concerns.

The EES notes that the visual impact of the tunnel works would be limited to surface construction works for cross passages. The temporary visual impact would be high, however the work would be confined to small areas and short duration (3 to 6 months). Further, the EES recognises that there will be some minor manageable impacts to public transport, pedestrians and cyclists are expected from construction-related road closures and diversions. In some locations diversion of bus routes would be required, and there would be minor delays at times to existing bus services. Some bus and tram stops will be moved slightly to facilitate construction activities and facilitate user safety, pedestrian and cycle path users would be diverted around construction sites and there may be some interruption to movement at construction traffic access points. As a result, during the demolition and construction works, no tenant would like to stay at our Property and it will be difficult to secure a tenant during these times. Owners will lose investment income.

To conclude, I ask that you please consider the above reasons and acquire our property as a whole. I am happy to relocate and leave the land with the Authority to better design the Box Hill area with more flexibility. Please note I would also like the opportunity for a representative of our building to speak at the hearing to support our position to be acquired. Please contact our lawyer Ebony Roach directly for the public hearing.

IMPORTANT INFORMATION ABOUT YOUR PROPERTY

SUBURBAN RAIL LOOP STAGE ONE: CHELTENHAM TO BOX HILL

I am writing to update you on Suburban Rail Loop and provide information on how the planning and development of Stage One: Cheltenham to Box Hill, including the 26km twin tunnel alignment, is progressing.

Suburban Rail Loop will transform Victoria's public transport system, connecting our suburbs and making travel easier and more convenient. It will connect every major train line from the Frankston line to the Werribee line via Melbourne Airport, improving access to housing, jobs, schools, universities and hospitals in Melbourne's middle suburbs.

Stage One of Suburban Rail Loop will connect our growing health, education, retail and employment precincts in Melbourne's south east between Cheltenham and Box Hill. It involves delivering:

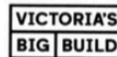
- Twin 26-kilometre rail tunnels
- Four new stations with links to existing stations at Cheltenham, Clayton, Glen Waverley and Box Hill
- Two new Suburban Rail Loop stations at Monash and Burwood
- A stabling and maintenance facility to support the new rail line
- Supporting infrastructure for the operation of the new tunnels and stations
- A dedicated fleet of high-tech trains to transform how Melbourne moves.

Suburban Rail Loop Authority (SRLA) is responsible for the planning and delivery of Suburban Rail Loop on behalf of the Victorian Government.

Planning and design work, along with ground investigations and stakeholder consultation, has helped us identify specific areas of interest for the locations of the six stations and the route of the twin tunnels linking them.

Stage One rail tunnel alignment

The work undertaken to date identifies that your property at [REDACTED] Box Hill is in an area of interest for the Stage One tunnels.



This means that the Suburban Rail Loop tunnels may travel under your property, constructed by Tunnel Boring Machines; on average, across the 26km route these tunnels will be around 26 metres deep - or the equivalent of six storeys underground.

The exact underground tunnel alignment is still to be determined. As was done for the Metro Tunnel Project by Rail Projects Victoria, if required, SRLA will conduct a formal process to acquire underground land for the Suburban Rail Loop tunnels once design is confirmed. The project team will keep all affected property owners updated.

It is important to note that only underground (sub strata) land needed to safely construct the tunnels and provide for their long-term protection would be acquired. Your property above at surface level would remain unaffected.

Planning and environmental assessment process

Like other major infrastructure projects, Suburban Rail Loop requires extensive statutory approvals.

In December 2020, the Victorian Planning Minister determined that rail infrastructure for Stage One will be assessed through an Environment Effects Statement (EES) – Victoria's most robust planning and environmental assessment process.

Supported by a range of technical investigations and studies, the EES will carefully consider and assess the potential impacts on people and the environment.

Over coming months, we will be seeking feedback on Stage One project design, including the stations, proposed tunnel alignment and supporting infrastructure from landowners and tenants, businesses, community members, councils, universities, and regulatory authorities.

You can currently provide feedback at suburbanrailloop.vic.gov.au/have-your-say.

There will also be an opportunity for you to participate in the formal EES process during its public exhibition phase, expected in late 2021.

Initial construction of Stage One is expected to start in 2022, subject to required approvals.

Find out more

March 2021

Dear Owner/Occupier

IMPORTANT INFORMATION ABOUT YOUR PROPERTY – SUBURBAN RAIL LOOP STAGE ONE: CHELTENHAM TO BOX HILL

I am writing to update you on Stage One of the Suburban Rail Loop project, and in particular to provide you with further details about the proposed station locations for Stage One and an important update about the anticipated impact on your property.

Suburban Rail Loop will transform Victoria's public transport system, connecting our suburbs and making travel easier and more convenient. It will connect every major train line from the Frankston line to the Werribee line, improving access to housing, jobs, schools, universities, and hospitals in Melbourne's middle suburbs.

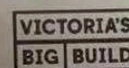
Stage One will be built as a 26-kilometre twin-tunnel, standalone line that will fully integrate into our existing public transport network with new underground stations at Cheltenham, Clayton, Monash, Glen Waverley, Burwood and Box Hill.

In November 2020, we wrote to inform you that your property was in an area of interest for the proposed station at Box Hill. It is our priority to communicate any likely impacts to affected landowners and tenants as early as possible. We have been working to finalise key elements of the proposed underground stations, including station footprints and entrances, as quickly as possible to provide a greater level of certainty for local residents and businesses.

As a result of further planning, technical and design work, including engineering and geotechnical investigations, and stakeholder consultation to date, we are now in a position to provide you with further information.

The planning and design work undertaken to date identifies that your property at G [REDACTED] Box Hill is likely to be required for Stage One of Suburban Rail Loop.

Please note that this letter is not a formal notice of property acquisition. The formal acquisition process will not begin until the planning and environmental assessment process is completed, and statutory approvals have been obtained, currently anticipated to be in 2022. While different properties will be required at various stages of the project, we expect that the first compulsorily acquired properties required for Stage One will not need to be vacated until at least late 2022.



Request to be heard Yes

Full name: Phillip Clark

Organisation:

Affected property:



Attachment 1:

Attachment 2:

Attachment 3:

Submission: I live directly across the road from this idiotic grand plan to build a train stabling network on land thats been promised as parkland , sporting facilities etc. for years. My wife and i both do shiftwork and have to sleep at any time on any day , which is hard enough without the possibility there could be hundreds more trucks , constant noise , dust , vibrations etc. every day and night for years. Who makes these brain dead decisions to build such a facility so close to residents ?

Request to be heard No - but please e

Full name: MelLisa Ryan

Organisation:

Affected property: [REDACTED] Heatherton Vic 3202

Attachment 1:

Attachment 2:

Attachment 3:

Submission: As a young couple my Husband and I investigated many suburbs across a 20km radius over Melbourne to become our home. We choose to buy, live and start a family in the Heath Estate. We spent years looking at the infrastructure of each location and growth potential (not just the home, but the suburb). Like every person who like us lives in the Heath, we love the modern underground infrastructure (No messy unattractive phone & powerlines above ground), we love the abundance of small community spaces, we even love the narrow curvy streets that keeps traffic speed low & large transport out. At the first open for inspection we blown away by the abundance of beautiful birds, and when I heard the Kookaburra's, I became very excited. But at the time, the green cover was sparce with mainly smaller trees in the Estate. So we investigated further and found the neighbouring spaces were promised 'Green Wedge' spaces, with promised parks, promised community areas and sporting facilities. This ticked every box to grow into a very desireable location, perfect for raising a family. Now 10 years on..... I feel betrayed! How can you compare the real estate and lifestyle appeal of living surrounded by Parks, nature and wildlife to a noisy, ugly, Train stabilising yard? Which real estate ads ever advertise views or sounds of a train stabilising yard? NONE!!! This is completely unjust!!! This proposal is a short sighted, lazy approach to Town Planning!!!! I suggest the commercially zoned Moorabin Airport would be a MUCH more appropriate location for a train stabilising yard... and perhaps include a train station there to support the use of public transport for the tens on thousands of shoppers that visit the DFO shopping outlets and visitors to the Moorabin Airport. Globally we know Electric Vehicles are the way of the future. This will include low cost quiet green energy electric aeroplanes, which all reports suggest will become viable and more common transport option in the very near future. A train station at Moorabin Airport will support the community now and well into the future. Please use this opportunity to create suburbs and locations that support us all well into our future, and the future of my 2.5 year old Twin boys.... which I hope will be at least another 85 years. Thank -you. Mel Ryan current happy long term resident of the Heath.

Request to be heard No

Full name: Antonie Els

Organisation: The Victoria Golf Club

Affected property: The Victoria Golf Club, Park Road, Cheltenham 3192

Attachment 1: <https://engage.vic>

Attachment 2:

Attachment 3:

Submission:

SUBMISSION MADE BY ANTONIE ELS

ON BEHALF OF THE VICTORIA GOLF CLUB

INTRODUCTION

The single biggest issue facing golf courses is the availability of adequate sources of water for irrigation purposes. For the golf courses within the area covered by the SRL East Development, to include surrounding areas encompassed by the 'study area', groundwater is our main source of water.

In the western part of the SRL project area, the Brighton Group sediments have a groundwater flow from the NE to the SW, draining into Port Phillip Bay.

To the SW of the Cheltenham SRL Station lie four golf clubs, namely: Cheltenham Golf CLUB (CGC), Royal Melbourne Golf Club (RMGC), Sandringham Golf Club (SGC) and Victoria Golf Club (VGC). The TAKE AND USE WATER LICENCES for these Clubs shows LICENCE VOLUMES of: CGC (90ML), SGC (30ML), RMGC (201ML) and VGC (156ML) for a total of 472 ML.



The majority of producing bores on the various golf courses source the Black Rock Sandstone (BRS) aquifer within the Tertiary-aged Brighton Group sediments. In this area the BRS yields good quality water (500ppm TDS) suitable for irrigation purposes. (Refer to Figure 6.7 in TAK1: Salinity of the watertable from regional mapping across Study Area for Bayside and Kingston local government areas (after FedUni 2015), with Project bore salinity data)

The proposed Cheltenham SRL Station lies solidly in a NE direction from VGC. ("Groundwater flow direction is, in general, topographically controlled and regional flow direction across the Study Area is in a southerly and south-westerly direction towards the coast."). Consequently, any and all impact arising from the construction of the Cheltenham SRL Station and the rail tunnel off to the north east,

on the groundwater associated with the Brighton Group sediments of which the Black Rock Sandstone is part, is of high concern to our four golf clubs.

Without a guaranteed, long-term supply of good quality bore water the golf courses would have to find alternative and costly supplies of water. As far as water is concerned QUANTITY and QUALITY are paramount.

The golf clubs have a good understanding of groundwater supply with respect to the Brighton Group sediments. This understanding was further enhanced after researching and assimilating the many 'UNPUBLISHED' geological reports and drill logs associated with the 1960's SOUTH EAST TRUNK SEWER. http://gsv.vic.gov.au/searchAssistant/reference.html?q=*.:* and utilising 'ADVANCED SEARCH GSV CATALOGUE SEARCH'.

During the design phase and construction of the SE Trunk Sewer and its Intercepting Sewers there were four basic stages in the compilation of the local geology:

- Initial drilling, with (400) holes 1,000ft / 305m apart
- Where 'irregularities' were encountered in the initial phase of drilling that might affect the construction of the sewer, infill drill holes were required. These were commonly 100m apart.
- Geophysics such as shallow seismic surveys were recommended
- In the actual construction of the sewers, mapping kept pace with the advance which allowed for a continuous geological section, albeit limited to one face of the sewer, to be compiled and added to the earlier drilling.

As a result of all this 1960's work, the geologists changed their (and our own) stance somewhat regarding the geology of the Bayside area:

- *"By decreasing the distance between drill holes from 1,000ft / 305m to closer to 100m, significant 'irregularities' in the Silurian surface become recognisable. For example, between bores CIS 17 and 18, a distance less than 100m, the bedrock falls 10.2m. The bedrock low is filled with highly porous and permeable limestone of Lower Tertiary age. This limestone also seen in CIS 15." And: "In various holes 'conglomerates' recovered on bedrock: CIS 12 between 7ft and 81ft (2m to 25m); CIS 11 58.5ft to 61.0ft (18m to 19m); CIS 18 between 84 ft to 85 ft. (25m to 26m)."*
- *"Tunnelling from Jasper Road. Channels of Tertiary sediments occur sporadically over 35% of the tunnel."*
- *"Tunnelling from Draper Street: Eastern Heading. Channels of Tertiary sediments have intermittently occurred in 51% of the tunnel. A single channel of Tertiary sediments, 35ft (11m) wide, cuts the tunnel."*
- *"From the previously constructed sections of C.I.S it has been shown that the Silurian/Tertiary contact is far more irregular than shown on original cross sections. 6 bores proposed (CIS 9 to 14) to more accurately delineate the Tertiary/Silurian".*

- *" The general area is located within the relatively flat flood plain of Dandenong Creek. Drill holes were sited approx. 1,000 ft apart. In hole 1/16 evidence of a post Tertiary stream bed between 12ft and 17.5ft (3.7m to 5.3m)."*
- *"The boring suggests that the old land surface carved from Silurian mudstones is practically flat. But the sinking of the caisson at Dowling Road found the surface of the Silurian beds not flat but varied in level by 15ft / 5m over 18ft / 6m. The material filling this old depression in the old land surface is well sorted, rounded gravel 1.3cm to 2.5cm in diameter. Bore 3/53 also struck this gravel, with the bore apparently near the southern edge of the depression. The gravel filled depression represents an old water course that wandered its way to the sea. It is at least 15 ft / 5m deep. Detection of an old water course, when covered by about 40m of other sediments including limestone will be most difficult and is to be the subject of further investigation"*
- *"The existing bores are not sufficiently close together to detect old water courses incised into the surface of the Silurian".*
- *"The Caulfield Interceptor Sewer (CIS) is situated within the Brighton – Cheltenham block which underwent several periods of uplift and basinward tilting during the Tertiary. These movements most likely led to the partial formation of incised streams in the Silurian rocks and certainly into various periods of marine transgression and regression. However, it cannot be stated whether the incised nature of the Tertiary / Silurian profile observed in the tunnel represents a likely or unlikely occurrence. This is due to a lack of detailed information on the nature of the Tertiary/Silurian contact across the Brighton – Cheltenham Block. Thus, it is not possible to determine if the occurrence of incised streams in the Silurian is characteristic of the Block as a whole, or whether such features are restricted to particular locations as a result of local, relative uplift of the Silurian. It is considered that the tunnel is situated on the edge of a stream valley eroded in Silurian sediments with the eastern end of the tunnel crossing the valley floor".*
- *"There is some evidence of 'valleys/depressions' between Brighton Fm and Newport Fm. e.g. Section 4 near Morey Road (found in tunnelling and not via drilling)."*
- *G4997 UR 1968/18. "The gravel filled depression represents an old water course that meandered its way across the old land surface. It raises the possibility of Tertiary sediments extending to tunnel level.....Detection of such an old water course will be most difficult.....the old land surface covered from Silurian mudstone, on which the Tertiary sediments were deposited, may not be as flat as the boring suggests"*
- *G5037 UR 1967/6. "The Cainozoic sediments consist of alternate sands and clays of the Brighton Group which overlie silty marine sands and clays of the Newport Formation. The boundary of these sediments has been recognised from the cores and in gamma ray logs. The gamma ray logs have proved very useful in determining the nature of the sediments and the probable thickness of the main aquifer which occurs in the Brighton group." We have found*

no mention in SRL Technical Reports K1 and K2 on any gamma logging associated with geotechnical drilling conducted as part of the EES. As only a handful of logs were included with the K1 and K2 reports, out of 340 drilled, it is also not possible for the reader to check on what down the hole geophysical logging was conducted.

- G32238. “....to cover the 13,000 feet of tunnel line likely to have old, buried water courses...”
- Anticipated Ground Conditions. Construction Geological report for MMBW by R.C. Gregg April 1969: *“It is a rather sobering thought that of a total tunnel section of 18,240 feet only 5,580 feet are in average to good tunnelling ground.”* Whilst this and some other comments are directed to tunnelling in Silurian bedrock, which is not to be intersected in the western section of the SRL tunnel, nevertheless it does illustrate that tunnelling is unlikely to be straight forward.

Reading the ‘References’ sections of TA K1 and TA K2 we can see no reference to any of the 1960’s reports associated with the SE Trunk Sewer. We find this concerning given the SRL passes through the same ground as the SE Trunk Sewer.

The various geological sections drawn in the 1960’s clearly show that the various interfaces between the Upper Brighton Group / Red Bluff Sands and the underlying Black Rock Sandstone is far from regular. This equally applies to the boundary between the Black Rock Sands and the underlying marine Fyansford sediments. We see this illustrated in the geological section: TA K1: *‘Figure 6.2 Geological long section between the SRL station at Cheltenham and the SRL station at Clayton.’* Intersecting any palaeovalleys during SRL tunnelling will have major groundwater implications.

Some time ago, we heard from a Senior Geologist at the Victorian Mines Department who was engaged in the search for groundwater across various golf courses in Melbourne in the 1960’s – 1970’s during a time of great drought, to include Royal Melbourne GC, Victoria GC and Metropolitan GC. He was also familiar with the work being carried out at this time on the SE Trunk Sewer. The SE Trunk Sewer is situated close to the western boundary of Metropolitan GC.

*“Metropolitan GC experienced a **significant** drop in their standing water level (SWL) when deep sewers were constructed in the 1960’s – 1970’s. This was due to the interface between the sewers and the bedrock sediments acting as a ready conduit for the groundwater, which found its way into sumps that was subsequently pumped away.”*

Reading the TA K1 and TA K2 reports we can only see mention of groundwater inflows INTO the rail tunnel and underground railway stations during construction, and during the later operational phase. There is no mention of groundwater loss via the interface created between the Brighton Group sediments and the outer walls of the rail tunnel. As, to our knowledge, it has not been addressed in the EES we cannot comment further other than highlight to you this major area of concern to us.

Our golf club does not want to see the Metropolitan GC ‘situation’ repeated.

ISSUES OF CONCERN

Repeat of the SE Trunk Sewer de-watering situation both during project construction, and when operational.

In the SE Trunk Sewer situation, in the South Oakleigh area, groundwater was pumped away never to be replaced.

From the Cheltenham SRL Station the rail tunnel dips at an angle down through Red Bluff Sands, into and through the same Black Rock Sandstones that form our golf clubs' main aquifer, and down into the underlying Fyansford marine silts. (*See: EES Mapbook. Vertical Alignment Plans. Map 1 of 38; and TA K1. Figure 6.2 Geological long section between the SRL station at Cheltenham and the SRL station at Clayton*) The lowest point of the tunnel in the entire section between Box Hill and Cheltenham is close to mean sea level, at the eastern end of this decline. (*See also hardcopy EES Summary Report. Page 8*)

The possibility of a parallel situation to that at Metropolitan GC and the SE Trunk Sewer cannot be discounted. We welcome detailed investigations and reporting into this aspect of the SRL East Development.

Groundwater drawdown association primarily with the construction of the Cheltenham SRL Station.

TA K2. 6.1.2.2 Groundwater receptors

The key groundwater receptors that Project works may impact at the SRL station at Cheltenham include privately-owned groundwater wells which are used to extract groundwater, or for investigation and monitoring of groundwater.

TA K2. 6.1.4.2 Potential impacts on groundwater wells

"Based on the modelled drawdown, construction of the SRL station at Cheltenham has potential to impact registered third-party groundwater wells used for consumptive purposes."

TA K2. 8.3.3 Potential impacts during construction

Based on the existing conditions, the potential impact associated with the Project is a change in groundwater levels which may in turn lead to:

- *a reduction in water availability for groundwater receptors including an existing groundwater well used for irrigation.*
- *Groundwater quality impacts due to disturbance of contaminated groundwater where land use may have caused groundwater contamination.*

It is important to realise, yet again, that the Brighton Group sediments that host our CGC/RMGC/SGC and VGC aquifers has water flow from the NE to the SW, into Port Phillip Bay. Cheltenham Station lies solidly in a NE direction from our golf courses. (*"Groundwater flow direction is, in general,*

topographically controlled and regional flow direction across the Study Area is in a southerly and south-westerly direction towards the coast.')

Groundwater loss during construction of the Cheltenham STL Station is well documented in the EES. The EES states: "*the unmitigated inflows and associated drawdown impacts are significant*".... "*It is anticipated that most of the groundwater will be disposed to sewer*". A figure of 233 Mega Litres is tabled as the expected groundwater loss. This is a significant amount of water which must have a negative bearing on the water table upon which the golf clubs rely.

Whether this groundwater loss is mitigated, and replaced with pumped, potable water either during the construction or for a period afterwards remains unclear to us. ("*Groundwater is able to flow laterally into the excavation through the Brighton Group Formation. It is likely that a drawdown mitigation scheme will be required to reduce potential adverse impacts associated with the predicted drawdown and changes to the groundwater flow field in the vicinity of contaminated groundwater plumes.*")

To our way of thinking the EES does not consider, in any detail, the 'downstream' area west / south-west of the Cheltenham SRL Station, towards our golf courses. The EES has not drilled any monitoring/observation bores in this direction. We consider this an omission, as we are equally likely to receive adverse groundwater to areas paralleling the SRL corridor, on which the EES report concentrates.

The EES makes general statements about the regional water table:

*"In the Regional model, which was run in steady state, the climate change impact of sea level rise was simulated. A 2150 maximum rise in sea level in Port Phillip Bay of 1.5 m was applied as a constant head. This resulted in a 0.3 m impact at Cheltenham station, which was allowed for in the groundwater level design. With respect to the variation in rainfall, and hence recharge, due to climate change the potential change in recharge rate using the median climate scenario results in a small decrease in recharge. During the calibration process, a range of recharge rates were evaluated and the potential climate change impacts were within the considered range. Hence **no change in recharge rate was simulated.**"*

TA K2. 6.1.2.1 Hydrogeological conditions:

Climate change predictions suggest a drier climate that leads to lower groundwater recharge and an estimated decline of 0.5 m in groundwater levels. Sea level rise is also predicted to influence groundwater levels at the SRL station at Cheltenham, with a possible increase of up to 0.3 m. Together with considerations of natural groundwater level variability and likely response to rainfall events, future groundwater levels may vary between 2.8 m lower and 2.2 m higher than current levels.

TA K2. 6.3.2.1.1 Hydrogeological conditions:

Climate change predictions suggest a drier climate that leads to lower groundwater recharge and an estimated decline of 0.5 m in groundwater levels. Sea level rise is not likely to influence groundwater levels at this location. Together with considerations of natural groundwater level variability and likely

response to rainfall events, future groundwater levels may vary from 3 m lower to 2 m higher than current levels.

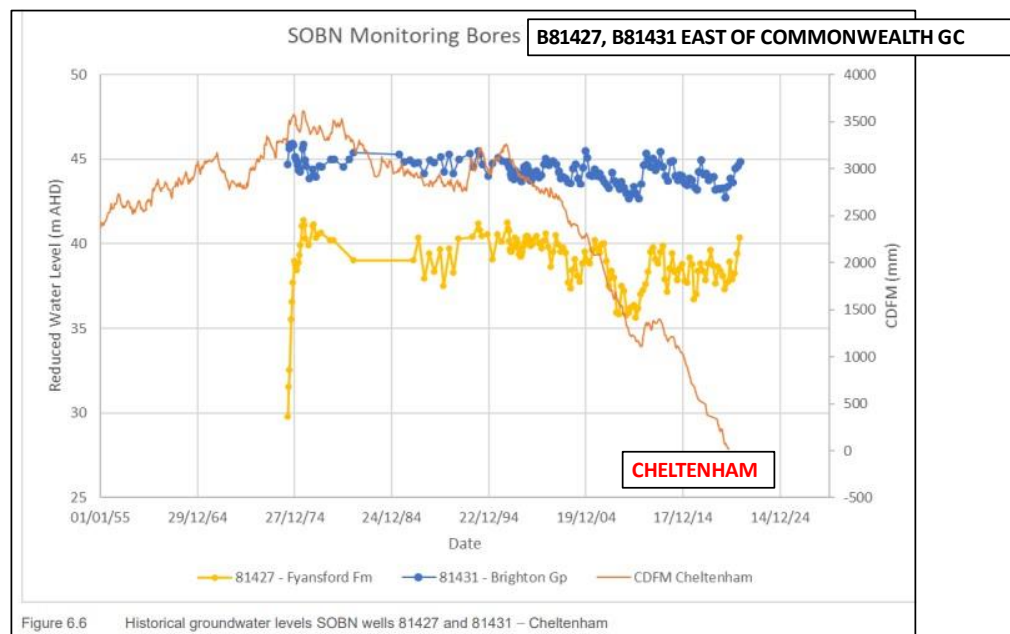
TA 1. 5.1.2 Future climate predictions

Sea levels will also rise in response to global and regional-scale changes in climate, and this is likely to be reflected to some degree in groundwater levels. The Victorian Coastal Strategy (DELWP 2014) recommends a sea level rise of 0.8 m for 2100 for planning purposes, although recent studies suggest sea level rise could be significantly higher. Based on consideration of new and improved models, Bamber et al. (2019)⁶ recommend using 2 m sea level rise by 2100 for planning purposes.

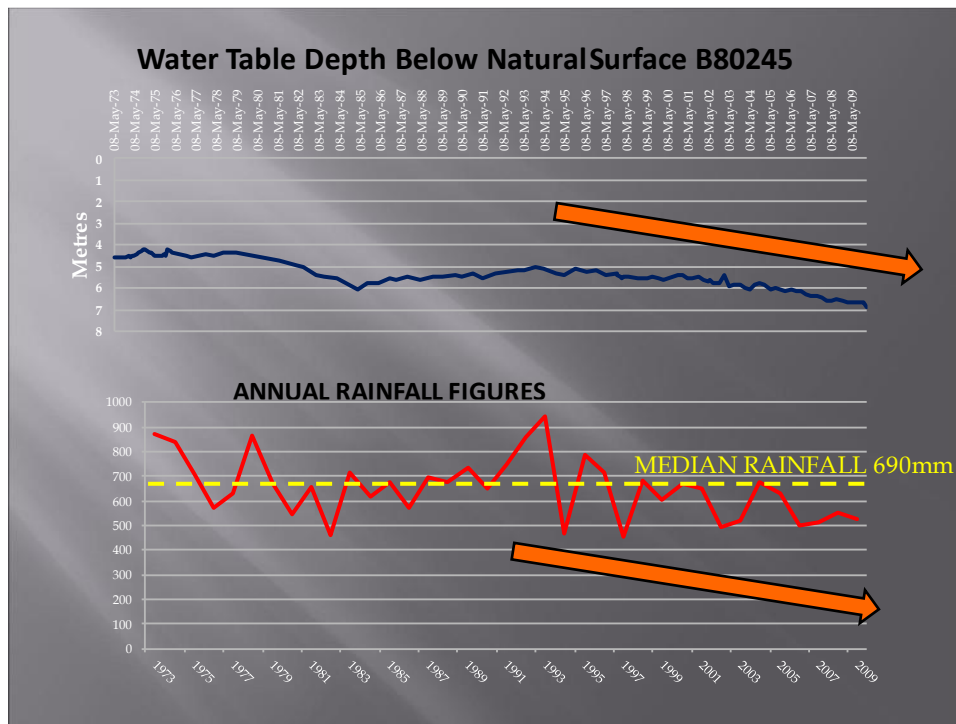
Design groundwater levels for the Project over the next 100 years have been estimated taking account of the influence of sea level rise, reduced rainfall/recharge, higher evapotranspiration, as well as changes due to infrastructure such as sewers. A maximum groundwater level rise of 2.5 m has been estimated over the design life of the Project.

TA K1. 6.2.3 Groundwater levels and flow

Nested SOBN bores approximately 5 km north-west of the SRL station at Cheltenham have been monitored since the 1970s and highlight a long-term declining trend in groundwater level in all aquifers since the 1970s (see Figure 6.6 BELOW). The magnitude of decline is fairly similar between aquifers (~1.5 m) and is consistent with the decrease in rainfall over the period November 1979 to May 1988. The decline is consistent with rainfall trends over that time.



This rate of drop is mirrored in State Observation Bore B80245 in Beaumaris. (Groundwater readings available 1973 to 2009). See figure below.



On our golf courses, borefield measurements show that in years with below average rainfall the water table continues to drop. Only in high rainfall years, such as 2010, 2011, does recovery occur. Since the 1960's, some 50 years ago, when we have records of SWLs in our bores, the water table has steadily dropped in line with both Figure 6.6, and Observation Bore B80245 above.

Adverse impacts to groundwater levels arising from the SRL will vest itself in a lowering of the Standing Water Levels (SWLs) in our bores. If SWLs drop in any meaningful way, then our upper Brighton Group aquifers may become 'dry' in the sense of productive long-term pumping.

As we continue to take SWL readings in our bores, we will be in an ideal position to monitor the SWLS during any construction phase of the Cheltenham SRL Station.

GROUNDWATER DRAWDOWN ONCE THE RAIL LINK IS OPERATIONAL, PRIMARILY ASSOCIATED WITH THE CHELTENHAM SRL STATION.

TA. K2. The **operational modelling scenario** was run for 100 years. Groundwater inflows into the Project during operation are shown in Table 9.1.

Calculated permissible groundwater Inflows.

Project element = CHELTENHAM

Footprint area = 7,761(m²)

Wall area = 3,959 (m²)

Permissible groundwater inflow = 0.86 (m³ /day)

Total Inflow 5.6 (m³ /day)

Being under the water table, the Cheltenham SRL Station and its surrounding infrastructure will leak water which will be pumped away to sewer. Only during the construction phase will the 'leakage' be quantified. Will this leakage be significant, remembering it will be continuous until the water table drops to the bottom of the station construction?

CONTAMINATION INTO OUR GROUNDWATER FROM THE FORMER LUCAS BATTERIES SITE AND THE FORMER HIGHTT GASWORKS, NOW THE SITE OF THE UNDERGROUND (SRL) CHELTENHAM STATION

Much is written in the EES about the high risk of contamination particularly during (and after?) construction of the Cheltenham SRL site.

TA. K2. (Section 1.6 Key Findings:

There is also potential for existing contamination to migrate towards the station box from the former Hightt Gasworks site, the former Lucas Batteries site (now Southland Shopping Centre), as well as other sites that have been used for light industry, manufacturing and fuel storage. The migration of contaminants associated with these sites presents a risk of harm to human health and the environment, which would require mitigation")

TA K2 6.1.2.3 Contaminated groundwater.

Areas of existing groundwater contamination and potential acid sulfate soil (PASS) have been identified as occurring or potentially occurring around the SRL station at Cheltenham. These were investigated further as disturbance of these sites may cause risks of harm to human health and the environment.

Existing conditions for these sites include the following:

- *Contaminated groundwater:*

> Numerous areas of known and potentially contaminated groundwater exist within 1 km of the SRL station at Cheltenham.

> Contamination is known to exist at two sites within 100 m of the proposed SRL station at Cheltenham: the former Lucas Batteries site and the former Hightt Gasworks. The presence of multiple groundwater plumes within close proximity of the SRL station at Cheltenham indicates a relatively high potential that these would be disturbed during the station's construction and operation.

Groundwater drawdown could cause the mobilisation of existing groundwater contamination or the activation of potential acid sulfate soil.

If this contamination reaches the Bayside Golf Courses two aspects should be considered. First will it pose a Health and Safety issue, and second will the bore water extracted still be suitable for our irrigation purposes?

A secondary situation arises. The area of VGC, CGC, SGC and RMGC lies in an area of low, 500 mg/L TDS values. Further east, along the line of the proposed tunnel, the TDS values rise through 1,000

mg/L TDS to >1,500 mg/L TDS. (Refer to Figure 6.7 in TAK1: Salinity of the watertable from regional mapping across Study Area for Bayside and Kingston local government areas (after FedUni 2015), with Project bore salinity data) A TDS value of 1,450 mg/L has been measured at Cheltenham SRL Station. Will the cone of depression centred on Cheltenham SRL Station promote the SW movement of high TDS groundwaters from the NE and E of Cheltenham?

We recommend that we have a robust collection of base line water quality/chemistry analyses against which water sampling at the time of station construction, and thereafter, can be compared.

GUIDANCE AVAILABLE FOR ASSESSING THE ACCEPTABILITY OF GROUNDWATER DRAWDOWN IMPACT ON EXISTING WELLS

K2. 5.2.3.1 Existing groundwater users. " Groundwater drawdown has the potential to reduce water levels in existing wells and impede the existing use of the wells. **There is limited guidance available for assessing the acceptability of groundwater drawdown impact on existing wells**, and therefore to determine what level of impact would require mitigation. However, the following objectives from DELWP's Resource Share Guidance (2015) are recognised:

- 'Maintain groundwater level so that any drawdown leaves sufficient saturated thickness to support current use'
- '...a change at the impact point that cannot be discerned from **background variability** or the limits of the **measuring techniques** – is considered insignificant'.

For consumptive uses such as irrigation purposes, a drawdown impact of less than 10% of available water column in **existing** wells is considered to satisfy these objectives and is adopted in this report as the threshold above which mitigation will be necessary."

We believe these 'mitigation criteria', and EES's references regarding 'saturated thicknesses' and 'water columns' can be improved upon.

EES writes: "There are several licensed wells beyond the predicted 0.5 m drawdown contour near Cheltenham Golf Club and ~~Royal Melbourne~~ Victoria Golf Club, the closest being WRK042457 (old Bore #5, no longer in operation), WRK042460 and WRK042461 (Cheltenham GC). Given that significant extraction can occur from these wells, there is potential for interference of drawdown cones around these wells and construction drawdown. As the wells all have a water column of around 35 m, this small drawdown is within acceptable limits (that is, less than 10% of available water column) and does not require mitigation."

At VGC, the replacement (WRK060523) for bore #5 has only 14m of water between the SWL and the bottom screen, not 35m. And further west Bore #3a / WRK042455 has only 7m of 'water column' from SWL to pump intake. If we lost 1.0m of water from Bore #3a it would become a borderline producer.

At CGC none of their three bores "have a water column of around 35 m".

There are differences comparing water levels in a dry, hot year where pumping is almost needed nonstop, and between wetter years when minimal pumping is required. Which 'baseline SWL figures' are EES to use?

Importantly, the down the hole geology is not constant. We rely on 'sandier intersections' +/- fracture intersections (of the type seen in coastal cliff exposures and rock platforms) in the otherwise unremarkable, sedimentary BRS sequences. Having a 1.0m drop can deprive us of our main source of water for some bores.

This change in geology is seen in the geological section (TA K1: *'Figure 6.2 Geological long section between the SRL station at Cheltenham and the SRL station at Clayton'*) in terms of the interplay of Red Bluff Sands / Black Rock Sandstones / Fyansford. We do not entirely agree with this section, in respect to the absence of Black Rock Sandstone BRS) over much of the western third of the traverse. Our bores clearly indicate the BRS plays a more significant role in this part of Bayside than the technical reports suggest.

We would argue the EES mitigation guideline of '>10% loss of water column' need to be refined to suit the existing Bayside Golf Course Irrigators. (See below for additional comments)

We note, as an aside, that the North East Link Project TA Report on Groundwater. pp 25/77 better defines this as: *"aquifer drawdown to pump intake, under the non-pumping condition."*

Whose responsibility is it to determine 'acceptable limits', the golf clubs or EES? This is important, especially, as we commented earlier, the EES has not drilled any monitoring/observation bores W/SW of Cheltenham SRL station.

Our recommendation is that EES cannot apply "Rural Water Corporation 1993 guidelines" to our bores. 'Length' in terms of a 'water column' needs to be further defined. Once the 'rules' are set in place then these would need to apply both to the CONSTRUCTION phase of the SRL and to the later OPERATIONAL phase. Modelling for the Operational Phase covers 100 years. This would suggest that 'future groundwater levels' for the area would have to be firmly established for both the construction phase and thereafter a 100-year operational period. SRL and the golf clubs would have to agree and document the 'guidelines (defined, we suggest, as the depth between the SWL to the pump inlet or bottom of screen, whichever is lesser) for all bores currently listed on the individual Water Licences.

CLOSING COMMENTS

With reference to the SRL East EES publication: SOIL AND GROUNDWATER , the Golf Clubs note:

- *"Since mid – 2019 we've engaged with over 20,000 people via online and face to face consultation"*. There has not been a single contact with the major golf course irrigators at CGC, RMGC, SGC, VGC even though several requests have been made to have a 'groundwater specialist' meet with us on-site.
- *"Key feedback relating to soil and groundwater...."* There are listed NO 'key feedbacks' for groundwater.
- *"SRL is committed to minimising impacts on soil and groundwater during the construction and operation of SRL East"....."Designing underground structures to minimise*

groundwater changes and the design and implementation of a monitoring program to verify that no significant impacts occur”.

Our submission is twofold. First, via direct consultation, we too want to ensure ‘impacts on groundwater’ are indeed minimised. Second, we ask to be part of any design and implementation of a monitoring program.

Kind Regards

Antonie Els
General Manager
The Victoria Golf Club

Request to be heard Yes

Full name: Silvestro Mascali

Organisation:

Affected property:

Attachment 1: <https://engage.vic>

Attachment 2:

Attachment 3:

Submission:

My property shares a fence with the Heatherton stableyard so this affects me in a big way

We built our family home here 67 years ago when the whole area was all market gardens. We were promised it would always be open space and could never be built on. It was mined in 1994 and we were told the site would be Rehabilitated and handed back as public open space once mining was finished. The labor government and council has also repeatedly said it will all become parkland.

The EES say there will be amenity impacts and that residents will adapt, if this is the case then it is clearly the wrong site and it needs to be relocated.

We feel a trainyard here will turn our suburb into a slum area and that should not be imposed on anyone

We have fought many battles on this site and each time we were promised it would be Rehabilitated. That's the only reason mining was allowed in the first place

They wanted to put a putrescible tip on the site which we also stopped. In hindsight looking back we should have let the tip go ahead because if it did then it would not be suitable for a trainyard today and it would have been finished long ago. It is only suitable for a trainyard because the community fought so hard over the years to have it clean filled. This application really hurts on these grounds and is affecting peoples mental health significantly.

There are several other sites that must be considered for this. One is the site the council suggested on the corner of South rd Moorabbin. One is the site SRL said was also suitable in Moorabbin industrial area. One is the site that the community chose in Dingley that's well away from homes with decent buffers like the Mordy bypass in-between, This site would also serve the DFO shopping and Airport precinct with a possible station. DFO has over 8 4 million visitors annually and also has accommodation for over 500 overseas flight students. An alignment to that area should be considered.

Dust control has not been looked at or properly considered, dust will not stop at our fence and it poses health risks like silicosis.

Brake dust from train wheels will be sucked out of the ventilation towers only 100 meters away and deposited on our homes, our washing line, cars, evaporative cooling filters and more. The towers will essentially vacuum out over 4 km of tunnels. Brake dust is often noticeable around outdoor train stations and that is just from a single stopping point, not sucked from a tunnel 4 km long.

Old Dandenong Rd is our only access to shops via Elder st south. Impacts of this has not been properly considered. Yes the bypass could be used but this will add significant time and risk to what should be a simple journey for essential supplies. To use the bypass commuters will need to turn left onto a busy rd then cut across 3 lanes of traffic to make the next right hand turn. Coming back there is no right turn onto kingston rd so we will have to drive to the next exit to make a U turn and come back, the EES does not sufficiently cover this.

11 years of construction near our homes will be a nightmare and has not been addressed properly.

The Delta site is full of contaminated soil which was always meant to stay safely buried below the surface with parkland on top, digging it all up and disturbing it again will create huge health problems and could turn into another metro tunnel fiasco.

The fantastic bird life in our area will be lost forever. Some species might adapt but not all of them.

Snakes, reptiles and rodents will be herded into our yards when the site is cleared as they will have no where else to go. We know there are snakes in site, we have seen them here before.

Landfill gas has potential to affect our homes and our Health.

Noise limits will be significantly higher particularly over night when sleeping. We will not adapt as it says we will in the EES

Light pollution will be 24/7

The EES acknowledges that this will have a negative effect on our homes and if this is the case then it simply should not be here particularly when other sites were identified.

This land is greenwedge, the locals fought hard to have it zoned greenwedge with a parks acquisition overlay placed on it which was to give us assurances that we will never be faced with something like an inappropriate trainyard right beside our homes. This is simply just wrong on so many levels and alternative sites need to be investigated. So far this has not been the case.

I wish for Move the trainyard and Heatherton RAID Inc to represent me at the hearing.

Kind Regards

Silvestro Mascali.

Request to be heard Yes

Full name: Maria Mascali

Organisation:

Affected property:

Attachment 1: <https://engage.vic>

Attachment 2:

Attachment 3:

Submission:

I am directly effected by this because I live my property shares a property fence with the Heatherton stableyard.

We have lived here for 67 years and built our family home here with the promised it would always be open space and could never be built on.

This site was market gardens as recently as 1990 and mining was only allowed on the proviso the site would be Rehabilitated and handed back as public open space.

Heatherton gets no benefit at all from a trainyard being here. We wont even be able to use it as the nearest station is over 4k away just to get on a train and come past our front door again.

Once this greenwedge land is gone then its gone for good and will never be replaced. The trainyard can and should go in the industrial area where it will not be so much of a hindrance to the surrounding land uses and will not negatively affect family homes

We helped fight and stop many applications over the years,

They wanted to put a putrescible tip on the Delra site at one time which we also stopped. In hindsight looking back we should have let the tip go ahead because it would have been long finished by now and would not be suitable for a trainyard today. It is only suitable for a trainyard because the community fought so hard over the years to have it clean filled.

All the trees in the linear walk and Henry st were planted by the community during weekend tree planting days, this area means so much to us but the trainyard here will tear it all away. It is so upsetting to think our beautiful suburbs may end up a slum area with devalued homes and a 24/7 industrial activity right next door just a few meters away

The EES says it will have a negative impacts on the amenity and goes on to say we will adapt to the noise and other adverse affects etc, that is ridiculous, how will we adapt? if they simply expect an entire suburb to adapt then it is clearly not the right location to start with, and appears no amount of mitigation will cure the issue. There is no talk of double glazing peoples windows or acquiring homes. 11 years of construction works followed by a lifetime of trains will not be easy for people living here. If they offer respite then how long can we expect? 1 week, a month, 5 years, 10 years?

There are several other sites that need to be considered for this. One is the site the council suggested on the corner of South rd Moorabbin. One is the site SRL said was also suitable in Moorabbin. One us the site that the community chose in Dingley that's well away from homes with decent buffers like the Mordialloc bypass. This site would also serve the DFO shopping and Airport precinct with a possible station.

Dust control has not been looked at or properly considered, dust will not stop at our fence and it poses health risks like silicosis. Dust coming out of 4 km of tunnels and blowing over our homes will be undeniably risky and stress full. We should not be forced to live in doors with windows and doors shut to keep dust and noise out of our home. We have done that before when the sand mines were here and it truly isn't fun. This area has put up with so much over the years, but we stayed and persisted because we were promised better things. Now it looks like it was all a lie and the years we spent here fighting for a better suburb was all a waste of time. We are all tired of fighting for this block of land to be Rehabilitated and returned as promised, we are getting run down and people just want to give up. No one should have to spend their lives fighting to protect their homes from so many different inappropriate developments like the people in Heatherton have had too over the years

Brake dust from train wheels will be sucked out of the ventilation towers only 100 meters away and deposited on our homes, our washing line, cars, evaporative cooling filters and more

Old Dandenong rd is our only access to shops via Elder st south. Impacts of this has not been properly considered.

11 years of construction near our homes will be a nightmare and has not been addressed properly.

Unique bird life in our area will be lost.

The closure of the Doggy play park on old Dandenong rd will a great loss to the area as this play park is the only one of its kind

Snakes, reptiles and rodents will effectively be herded into our yards when the site is cleared..

Landfill gas has potential to affect our homes and our Health.

Noise limits will be significantly higher particularly over night when sleeping.

Light pollution will be 24/7

The EES acknowledges that this will have a negative effect on our homes and if this is the case then it simply should not be here particularly when other sites were identified.

This land is greenwedge, the locals fought hard to have it zoned greenwedge which was to give us assurances that we will never be faced with something like an inappropriate trainyard right beside our homes. This is simply just wrong on so many levels and alternative sites need to be investigated. So far this has not been the case.

I wish for Move the trainyard and Heatherton RAID inc to represent me at the hearing.

Thankyou Maria Mascali.

Request to be heard No

Full name: Stephen Watt

Organisation:

Affected property: The Heath Estate

Attachment 1:

Attachment 2:

Attachment 3:

Submission: I have lived in the Heath for 20 years and have been waiting for the government promised green wedge to be completed. Now this train yard proposal is the complete opposite of this government promise. Residents will now have noise, dust and congestion during a long construction period and ongoing environmental impact. Surely this train yard can be placed further away from houses in the immediate vicinity? There is a lot of vacant land closer to Old Dandenong Road or along the Dandenong bypass. I would also question why this project is needed, surely widening Warrigal Road from South Road to Chadstone and the entrance to the Monash freeway would be more beneficial to most of the community?

Request to be heard Yes

Full name: Dr Vernita Zigouras

Organisation:

Affected property:

Attachment 1: <https://engage.vic>

Attachment 2:

Attachment 3:

Submission:

SUBMISSION –SUBURBAN RAIL LINK EAST

Dr Vernita Zigouras

This submission is from Dr Vernita Zigouras of [REDACTED] Box Hill 3128.

[REDACTED]

I researched and prepared this submission using knowledge of the Box Hill Community for over 50 years.

During this time, I received a Life Membership from the Box Hill Football Club where I served in the Board of the Club, plus much community work.

I am a member of the Neighborhood Watch Program, receiving an Award for 20 years' service.

This submission will focus on the Box Hill Section of the SRL.

I believe the SRL Project has merit, but has many problems associated with it, some of which must be addressed immediately.

There are too many statements which lack clarity and local knowledge.

These will be addressed under the subheading listed below and as outlined in the SRL-East. Environment Effects Statement Summary Report.

As my address/residence shows I will be impacted greatly by the Effects of this SRL.

The impacts will be brought to the attention of the Submissions received.

The most important one for me is not to proceed with OPTION 3

Box Hill already has rail, bus, and tram connection, but these are poorly coordinated, outdated and involve significant walks between the modes.

The SRL Box Hill Station in its current form does not address this significant opportunity for improved public transport connectivity. An engineer described SRL Box Hill design as lacking sophistication for its lack of integration between the modes. At the very least there should be a direct underground link between the existing Box Hill Railway station and the SRL Box Hill. Other improvements would be relocating the very outdated bus interchange to be closer to both rail and tram. The current lack of public transport integration would negate any time benefits from a single journey on the SRL.

Daniel Bowen, spokesperson for the Public Transport Users Association says, ‘You don’t want a long walk between platforms. Easy, quick. Seamless is the key-and seamless includes not having to exit through fare gates and enter again to make a train-to-train connection.... If people are going to use it en masse, the experience needs to be quick, easy, seamless, and as close to convenient as possible to hopping in the car.

The difference between bad outcomes and good outcomes may require more planning effort and higher cost. But some-like better feeder services-provide huge direct and indirect benefits for minimal extra cost compared to the overall project”

The Australian Taxation Office presents a great health risk due to wind tunnels.

I have experienced a violent wind tunnel due to the proximity of the ATO. This happened in November 2019, when much damage was experienced. Car park signs were blown across the park and into neighboring properties including my own. Tiles were found in my back year. My fence was blown over.

This is of great concern to me.

Further the earthquake earlier this year in north-east Victoria and felt by us, as the sound of 5-ton trucks going over the top of my house.

Move the SRL Station to OPTION 4

SRL STATION AT BOX HILL

P24-25 EES

Construction Activities:

The time of 6 years is far too long for any community to sustain. The demolition of existing structures and earthworks to prepare the site, tram terminus relocation and a temporary road and utility bridge over the station box imprint used to divert traffic on Whitehorse Road during main construction activities~~---~~6 years.

ASSESSING AND MANAGING PROJECT IMPACTS

I am unable to determine the systematic and risk-based approach for the sections outlined in the material.

As a resident I am not convinced about the 5 main phases including the assumed design and example mitigation measures to minimize risks and impacts.

There has been no consultation with those affected by planners and whether risks and impacts are satisfied by those affected.

The Impact assessment summary-is lacking any understanding of perspectives of residents or businesspeople—because of the lack of consultation.

To understand the impact of the project-one first must have knowledge of the Project—this has not been the case here.

I have researched using my PhD skills to determine the issues related to the Project.

Recommendation

Relocate the Option 3 to Option 4.

ABORIGINAL CULTURAL HERITAGE.

Recognition of Aboriginal Cultural heritage must be respected. Plus, there may be future identification of Aboriginal Cultural Heritage in future years.

AIRBORNE NOISE

This section provides information such as complying with construction noise guidelines without specifying what such guidelines say.

The tunnels to be in the Box Hill area do not rate a mention.

My reading on this topic indicates that airborne noise would be compounded by the works as planned.

This issue must be addressed given the number of disruptions outlined in the EES Statement.

For work in any part of this large Project to continue-more work must be undertaken to lessen airborne noise.

AIR QUALITY

As a sufferer of [REDACTED] I was particularly interested to read the material relating to clean air. So, I was concerned to read that the SRL proposed station has a higher air quality risk profile due to the distribution and

proximity of several residential towers and other sensitive receptors to the construction site.

This situation is a big health risk to residents like me, especially on days where the pollen count is very high. Melbourne has already experienced one such day recently when many residents were caught in such an event and did not survive. Who was to be held accountable in their cases?

I do not agree that Human Health Impact Assessment -which states that impacts would be low.

Elderly residents at the Uniting Age well Aged Care Facility which backs onto the north-eastern part of the Box Hill Gardens will have noise, dust, and extensive construction and other intrusive activities for at least 6 years.

The Environmental Air Pollution and Dust Management Plan (EAPDMP) -will be required to set controls to reduce---‘as far as reasonably practicably’-impacts on health and amenity due to dust emissions during construction.

POPULATION FORECAST

In the City of Whitehorse, between 2016 and 2041 the number of persons aged 65 years and over is expected to increase by 11,113 persons (38.8 per cent) and comprise 17.3 per cent of the total population.

The majority of 65–85-year-old are forecast to reside in the suburbs of Box Hill and Mont Albert-followed by Burwood, Box Hill South and Box Hill North.

This monitoring program would provide early notice of potential issue so that they are investigated and mitigated before there are actual impacts to the surrounding community.

This process is not satisfactory---it would lead to health issues and unsatisfactory outcomes for the residents of Box Hill.

Recommendation-

The Independent Environmental Auditor needs to complete regular monthly inspections of the construction zones to ensure every attempt is being made to comply with ERPs.

Ongoing clearly stated and open communication channels for affected residents’ ratepayers, business owners, and employees to express their

concern. How to lodge a complaint needs to be clearly communicated in writing by the SRLA to people likely to be affected.

These must include broadcasts on radio when there are high pollen days.

ARBORICULTURE

Concerning the impact of the loss of trees in a period of climate change is proceeding backwards. A number quoted as 102 trees to be removed within the central median of Whitehorse Road or the eastern section of Box Hill Gardens—which includes the area where I reside—is most unsatisfactory.

Many are mature trees of high or moderate arborical value—but no trees of very high value will be removed. Which trees are these?

The trees not only add to overall amenity for locals and visitors, but also serve important functions such as soaking up greenhouse gases, biodiversity, shade, visual amenity, habitat for fauna, and adding to the overall Whitehorse tree canopy. There are no comparable park areas for recreation and overall enjoyment close to Box Hill Gardens.,

Throughout the COVID-19 LOCKDOWNS, many more people have realized what an invaluable and precious asset our green spaces are for physical and mental health, especially those living in my street in high-density, high-rise apartments.

I have trees on my property-2 are almost 100 years old and 2 gum trees are 50 years old. Further there are 24 trees on my property-all work to address the Climate Change problems, plus provide areas convenient to fauna and flora.

The language in this section is very uninformative.

Recommendation

No tree removal in this area.

BUSINESS AND RETAIL

There are 72 commercial properties to be acquired by the Project-for the SRL station. With the loss of 50-60 businesses. This will decimate local trade—many of whom are telling me that their customers are travelling out of Box Hill already because of issues relating to parking and fines.

The cultural life of the local Asian community will be lost and move elsewhere.

I strongly disagree that the impact will be minor-and wonder where this opinion came from.

The 'relatively small reduction "in parking for 6 years is far from satisfactory.

Recommendation

A rethink on this element must be done. There is far too much disruption for the increase in apartment residents to possibly undertake.

The whole precinct needs to be reconsidered, so as it stands, will mean the loss of businesses and shops, resulting in the lack of interest in going to this precinct for 6-7 years.

CONTAMINATED LAND

From EES STATEMENT.

Management of hazardous gases characterized by methane and carbon dioxide associated with natural and man-made sources is proposed to minimize risks to human health-where applicable. Construction of gas venting barriers, 'Over-grouting cross passages before construction starts, and increased ventilation'

This does not accommodate the risk to human health. Much more detailed planning needs to be undertaken, for me to be satisfied no harm will be generated.

ECOLOGY

The report claims that no significant impacts to any species including threatened fauna are predicted.

I am unable to understand the logic of the opinion that 'Mature trees are likely used for foraging and nesting by common non-threatened fauna well adapted to living in degraded urban environments.'

No source is cited for such opinions. This makes it difficult but not so easy to accept such opinion.

ELECTROMAGNETIC INTERFERENCE

I find difficult to understand the opinion that electromagnetic generated by the project would not affect the health or amenity of residents and communities.

Mentioned 3 times in the EES Statement, Human Health-

‘Modeling shows that electromagnetic fields generated by the Project would not affect the health or amenity of residents and communities, with emissions well below the public exposure limits-stipulated in international EMF exposure guidelines. Disturbance of background electromagnetic fields from moving metal mass does not generate any potential impacts for human health.’

This statement is completely different to the work of the **WHO WORLD HEALTH ORGANISATION** which provides the following information-

RADIATION:

Electromagnetic fields-4 August 2016-

In one section the WHO is concerned to provide biological health hazards-

These include an increase in health questions household products and power lines.

Reported symptoms include headaches, anxiety, nausea, and loss of libido.

WHO says more research is needed to allow the public to understand what is going on around them and its possible effect on their health?

Following the respected advice from WHO, I believe that EES will need to provide more accurate information to the residents of Box Hill.

GREENHOUSE GAS

Only Project wide statements are provided in this section.

It is however a requirement that Greenhouse gas be regulated with all safety measures in place.

GROUND MOVEMENT

Deep excavations in densely populated urban area –such as Box Hill, impose specific challenges, especially the potential impact on adjacent structures from induced ground and structural movement. They can also be a nuisance to the community with site entry and exit challenges, shoring, underpinning.

Alterations to operations, dust, noise, vibrations, and traffic congestion.

Key to addressing these issues is the early engagement of key stakeholders and the early identification and resolution of critical issues that may have an adverse effect on the locality.

Thoughtful planning and effective design solutions can minimize the impact on the built environment.

Recent earthquake disturbance.

‘The predicted impacts from ground movement at the tunnel section in the Whitehorse local government area would be negligibly to minor it aesthetic and superficial effects only” EES

Justification not given. No rationale provided.

MOVING MATERIAL

The movement of materials will impact the local area. Disposal of excavated material in urban areas is problematic.

It will affect the following residents in Box Hill-

Delays in traffic make people late for school or work, and appointments.

Businesses suffer when clients and customers find it hard to access them.

Everyday emergencies turn critical when ambulances, rescue crews and fire trucks are not able to travel regular routes.

GROUND WATER

Box Hill is not expected to have a significant impact on the existing ground water environment. There are, some localized potential contamination sources.

HISTORICAL HERITAGE

Demolition of buildings west of the Hotel would be demolished This plan does not recognize the local heritage of the shopping precinct and should not take place.

My own property was built in 1924 and has many heritage features which I want to protect.

It has been cared for by my family for 46 years.

It is our intention to remain in this location.

Therefore, the siting of the new SRL station must go to Option 4—away from so many bad effects on the residents and businesses of Box Hill.

HUMAN HEALTH

This is one of the most important parts of the Project—the Health and Wellbeing of a large responsibility of all 3 levels of Government -Federal, State and Local. Large budgets are devoted to Health of all Australians.

I read with disbelief the assessment section where words such as “negligible impacts on human health”

This underlined section appears 3 times in the section. It relates to community health.

Many of the subheadings contained in EES, health issues are covered-as each one has some impact on the health of residents in the local Box Hill area.

Wind tunnels and the Australian Taxation Office...

Research and local experience show the impact of wind tunnels coming off the sides of the 34 story ATO which has 1250 workers on site. Should an event occur, then no station needs to be involved.

Recommendation

Option 4 must be used and not Option 3. There is too much disruption to the health and well being of the residents of Box Hill. Option 4 involves the use of land more suited-and less resident upheaval.

LAND USE PLANNING

The proposed use of land for the SRL plan is not satisfactory. Too much land is being grabbed in the current plan. We refer to the Box Hill Gardens—which is completely avoidable. It does not need to be used at all. This would improve the mental health of all the residents in the area.

At times I have been in the hospitals located opposite to the Box Hill Gardens.

It does not need to have the park turned into a work site for so long.

This use of the Box Hill Gardens absolutely needs to be stopped.

LANDSCAPE AND VISUAL

EES---We are opposed to the Option 3 which would impact the landscape and visual to a very unacceptable level.

The uses of the streets as in the plan, such as integrating Box Hill Central-will not improve the visual site of that area. With 2 new 55 story building at 15 and 17 Market Street will further add the stress of the residents and businesses in the area.

The Project work must proceed east -away from the built-up area around the 34 story ATO and its associated problems.

Project work must proceed east to avoid destroying the local area for its residents and business.

SOCIAL AND COMMUNITY

This section reflects little understanding of the writers of the assessment.

In 2016, 40.6 per cent of people aged 65 plus years in the City of Whitehorse were born overseas, and 31.8 per cent were from a non-English speaking background.

DISABILITY

THE 2016 Census identified 7,628 people or 4.7 per cent as needing help.

The Project would temporarily –ie 6 years. Occupy the eastern of Box Hill Gardens and reconfigure the Whitehorse Road Linear Reserve.

Then— ‘however these public open space areas would be reinstated once construction was complete—after 6 years. What is the precedent for the temporary loss of parkland during construction of large projects in Victoria?’

What is the *management of Public Open Space Framework*.?

It is important to consider the social impact on residents and project- affected persons PAPS

Recommendation

Robust grievances and mechanisms to receive constant feedback from the community help ensure that the risk mitigation is minimizing impacts.

SURFACE WATER

It has been written that the tunnels and station entrances have been designed to accommodate flood events. This was probably the case in NYC when floods devastated the underground tunnels and rail systems.

No one can guarantee that flooding will not occur.

TRAFFIC AND TRANSPORT

Another assessment which does not reflect the understanding of the residents of Box Hill. Many ratepayers, residents and business owners are very concerned about how the Box Hill retail and restaurant precinct will survive during the 6-7 years of SRL Box Hill construction, not to mention with other construction projects running simultaneously.

Traffic Chaos will be further exacerbated by the high volumes of vehicle movement, especially along Whitehorse Road, a major east-west arterial road for the eastern suburbs.

The traffic chaos from haulage trucks will not be confined locally to the eleven access to the construction site gates but will affect drivers on any of the main roads such as Elgar Road and Middleborough Road that lead to and from the Eastern Freeway, Eastlink and Monash Freeway.

Traffic will be reduced to waiting lines-due to 120-230 vehicles entering and leaving the construction area per day, as well as cars associated with workers in other development in the area.

I do not agree that the Project would not have any significant impact on the existing Box Hill Railway Station and rail corridor. Relocation of the 109 Tram terminus will impact pedestrians. This needs to be reconsidered.

Whilst the current plan is in consideration---the text describing road usage does not meet the need of the residents, businesspeople, or visitors to Box Hill.

VIBRATION AND GROUND-BORNE NOISE

The vibration of the building structure close to urban rail generates ground-borne noise, which can cause disturbance to the residents. Sleep disturbance and annoyance, mostly related to transportation noise, comprise the main burden of environmental noise.

This vibration and noise are caused by vehicle speed, power machines, transmission of the cooling fans and so on.

In Box Hill –short term perceptible impacts or noticeable ground- borne noise are predicted at up to 15 residential and 15 commercial properties-under the current plan.

Underground tunnelling will occur 24 hours daily and 7 days per week. EES.

There will be much disturbance in this section for far too long for residents to endure. It will cause much harm to the residents and those who work in Box Hill.

.....

RECOMMENDATIONS

This PROJECT is so big, for Box Hill it means undertaking all the elements required for a sophisticated modern rail tram and bus network.

The Project must not look like a sore toe with only bits and pieces new and the rest old and in need of renewal.

The precincts of

EDUCATION, Box Hill Tafe; Koonung Secondary College

MEDICAL, Box Hill Hospital, Eastern Health, and Medical Centers, and

CIVIC -Box Hill Town Hall, Administrative Services,

CENTRAL SHOPPING CENTRE-

all require a modern connected bus, train, and tram service.

The Central Station in Munich Germany where I have visited-had all modes in the one station. A seamless transport system.

SUMMARY

Environmental Impact

An Environmental and Social Impact Assessment-ESIA-Goals

- To predict environmental, social, economic, and cultural consequences of the Proposed Project

- To assess and review plans to mitigate any adverse impacts resulting from the proposed project
- To support the goals of environment protection and sustainable development
- To integrate environmental protection and economic decisions at the earliest stages of planning and activity.

My research has demonstrated the need to alter the SRL plan and for so many reasons.

Specifically, for the reasons as stated in this submission Option 4 is the Option needed to make this Project viable.

Option 3 for the reasons set out in my submission is not a viable Option.

Proceed east with the new Box Hill Transport Hub with all buses and trains linked. Move the tram Terminus further east Whitehorse Rd to Middleborough Rd—outside of Box Hill High School. With further benefits of the local Box Hill Oval to the north and the historic Box Hill Cemetery to the south.

SOURCES

Alert Digest No 11 of 2021—Suburban Rail Loop Bill 2021 Introduction 7 September 2021 Hon Jacinta Allen MP. Second Reading 8 September

Analysis an Options –May 2019 mgs

Australasian Fire and Emergency Service Authorities Council 2018. *Fire safety for Road Tunnels* (AFAC) Publication no 3003. AFAC, Melbourne, Australia

Guidelines for Pedestrian Wind Effects Criteria—Australasian Wind Engineering Society AWES -September 2014

Review of Strategic Direction Box Hill Metropolitan Activity Centre

WRARA-Whitehorse Ratepayer and Residents Association—While you weren't watching

Konstantinos Vogiatzis and Georges Kouroussis-

Airborne and Ground -Borne Noise and Vibration from Urban Rail Transit

WEB SITES

[http://www.whitehorse.vic.gov.au/about-council/facts-maps/older-persons-fact](http://www.whitehorse.vic.gov.au/about-council/facts-maps/older-persons-fact-sheet) sheet

<http://www.theage.com.au/victoria> /fears-of-maze-like-suburban-loop-stations-lack- links -trains-unis

<http://engage.vic.gov.au/suburban-rail-loop-stage-one>

<http://weara.weebly.com/the-suburban-rail-loop-project.html>

<http://www.theage.com.au/national/victoria/streamlined> or autocratic ?

<https://www.newcivilengineer.com/the-futureof/future-of-tunneling>

<http://www.watag.org/in-the-news>

<http://www.who.int/news-room/questions-and-answers/item/radiation-electronic-fields>

<https://csengineering.com/construction-challenges-of-rail-in-an-urban-environment>

Dr Vernita Zigouras

BA; LLB; LLM; PhD

[REDACTED] Box Hill 3128

[REDACTED]

Request to be heard No - but please e

Full name: Barbara Adell Martin

Organisation:

Affected property: [REDACTED] Glen Waverley

Attachment 1: <https://engage.vic>

Attachment 2:

Attachment 3:

Submission:

Submission to:

Email: environment.assessment@delwp.vic.gov.au

Submission submitted by;

Australian Unity Residents Representative Committee (Residents at Campbell Place)

[REDACTED] Glen Waverley 3150.

This submission considers the interests of residents from 54 Residential Apartments (approx. 70 residents), including a further 102 Aged Care residents and staff totaling in excess of 200 persons located at Australian Unity Aged Care Facility 131 – 141 Coleman Parade Glen Waverley 3150.

Monday 13th December 2021

Dear Sir / Madam,

While we recognize the long term benefits this project will bring to the district, we have significant concern regarding aspects of the development during the lengthy construction stage.

We have read the public documents provided at the public information session at the Glen Waverley Bowling Club on Thursday 25th November and follow up information provided by the personnel in attendance.

Our submission is based on the document “Managing potential impact on Residents”

All residents in the precinct above are aged between 75 – late 90 years and have a range of health-related issues using walking aids and some wheelchair related.

We are seeking consideration regarding the following matters.

- (a) Noise insulation – doubled glazed windows where not currently installed to offset the noise and dust from truck movements exiting the construction site along Coleman Parade and the associated gear changing of fully laden trucks with construction demolition and excavation material.

From the documents provided 230 truck movements per working day (approx: one truck every two minutes) will be passing both Australian Unity properties in Coleman Parade.

Given the high volume of truck movements involving noise and road dust for lengthy periods over several years during the construction phase, we believe consideration of this impact is imperative to the welfare of our residential community.

- (b) Further from the information provided at the briefing a proposed “Zebra Crossing” is planned in the vicinity of the area in Coleman Parade and Myrtle Street.

We submit that this type of crossing to be totally inadequate to enable our cohort of residents to safely access the proposed pedestrian walkway to be constructed adjacent to the current Glen Waverley train station and provide access to the Kingsway shopping area and Glen Shopping area. (An added issue may relate to exiting cars from the underground parking of the Ikon building)

Therefore, we are seeking the installation of adequately timed controlled traffic lights to be installed to ensure the safety and welfare of our residents and other neighbouring residents be urgently considered.

- (c) Some concern is expressed regarding the access for Ambulance access attending both Australian Unity properties.

Alternative provision is possible for the Residential Apartments from the Carramar Avenue entrance. However, the Aged Care facility with frequent need for ambulance access would require a relocated area from the rear of that property in Florence Street.

The issues raised are serious concerns for our community cohort and we seek your urgent consideration of the above matters.

We would appreciate developing a cooperative link with the SRL contractor when announced, so that issues affecting Australian Unity residents can be facilitated.

Written on behalf of Australian Unity Residents.

Yours Sincerely,

John Barnes
(Chairman)

Request to be heard Yes

Full name: Richard Forsyth Director of Courses

Organisation: The Royal Melbourne Golf Club Inc.

Affected property: Cheltenham Road, Black Rock

Attachment 1: <https://engage.vic>

Attachment 2:

Attachment 3:

Submission: To the IAC, Given the short notice regarding the closure of submissions relating to this matter we have provided a brief letter expressing our concerns and desire to be included in the process moving forward in relation to this development and its potential impact on the supply and quality of groundwater to our property and other golf courses in the area including Sandringham Golf Links (which we manage) and peer clubs including Victoria Golf Club. The technical information provided in the submission made by the Victoria Golf Club has been shared with Royal Melbourne Golf Club and rather than duplicate this detail we submit a copy of their submission in support of our submission as evidence that we share their concerns. We have their permission to do this. Richard Forsyth is registered as our point of contact as he will speak if required during the hearing however I can also be used as a point of contact if Richard is unavailable. Sincerely, Damon Lonnie General Manager The Royal Melbourne Golf Club [REDACTED]



THE ROYAL MELBOURNE GOLF CLUB

16 December 2021

Attention:
The Suburban Rail Loop East Inquiry and Advisory Committee (IAC)

Re: Submission

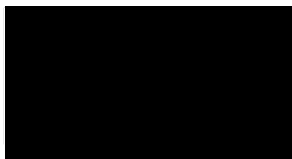
On behalf of The Royal Melbourne Golf Club (RMGC) we wish to support the concerns of the Victoria Golf Club set out in their submission dated Thursday 16 December 2021 (attached).

We wish also to be heard at the hearing commencing on Friday 28 January 2022.

We propose to call evidence from Richard Forsyth, the Director of Courses at RMGC who has working knowledge of the groundwater issues at RMGC. We may be represented by Counsel and if so, we will notify the IAC in advance.

We apologize for the brevity of this submission however this is due to only becoming aware recently of the matter concerned.

Yours sincerely



Damon Lonnie
General Manager

A.B.N. 18 539 363 278

Cheltenham Road, Black Rock, Victoria 3193, Australia

Postal Address: PO Box 18, Black Rock, Victoria 3193

Telephone: (03) 9599 0500

Email: rmgc@royal.melbourne Web: www.royal.melbourne

SUBMISSION MADE BY ANTONIE ELS

ON BEHALF OF THE VICTORIA GOLF CLUB

INTRODUCTION

The single biggest issue facing golf courses is the availability of adequate sources of water for irrigation purposes. For the golf courses within the area covered by the SRL East Development, to include surrounding areas encompassed by the 'study area', groundwater is our main source of water.

In the western part of the SRL project area, the Brighton Group sediments have a groundwater flow from the NE to the SW, draining into Port Phillip Bay.

To the SW of the Cheltenham SRL Station lie four golf clubs, namely: Cheltenham Golf CLUB (CGC), Royal Melbourne Golf Club (RMGC), Sandringham Golf Club (SGC) and Victoria Golf Club (VGC). The TAKE AND USE WATER LICENCES for these Clubs shows LICENCE VOLUMES of: CGC (90ML), SGC (30ML), RMGC (201ML) and VGC (156ML) for a total of 472 ML.



The majority of producing bores on the various golf courses source the Black Rock Sandstone (BRS) aquifer within the Tertiary-aged Brighton Group sediments. In this area the BRS yields good quality water (500ppm TDS) suitable for irrigation purposes. (Refer to Figure 6.7 in TAK1: Salinity of the watertable from regional mapping across Study Area for Bayside and Kingston local government areas (after FedUni 2015), with Project bore salinity data)

The proposed Cheltenham SRL Station lies solidly in a NE direction from VGC. ("Groundwater flow direction is, in general, topographically controlled and regional flow direction across the Study Area is in a southerly and south-westerly direction towards the coast."). Consequently, any and all impact arising from the construction of the Cheltenham SRL Station and the rail tunnel off to the north east,

on the groundwater associated with the Brighton Group sediments of which the Black Rock Sandstone is part, is of high concern to our four golf clubs.

Without a guaranteed, long-term supply of good quality bore water the golf courses would have to find alternative and costly supplies of water. As far as water is concerned QUANTITY and QUALITY are paramount.

The golf clubs have a good understanding of groundwater supply with respect to the Brighton Group sediments. This understanding was further enhanced after researching and assimilating the many 'UNPUBLISHED' geological reports and drill logs associated with the 1960's SOUTH EAST TRUNK SEWER. http://gsv.vic.gov.au/searchAssistant/reference.html?q=*.:* and utilising 'ADVANCED SEARCH GSV CATALOGUE SEARCH'.

During the design phase and construction of the SE Trunk Sewer and its Intercepting Sewers there were four basic stages in the compilation of the local geology:

- Initial drilling, with (400) holes 1,000ft / 305m apart
- Where 'irregularities' were encountered in the initial phase of drilling that might affect the construction of the sewer, infill drill holes were required. These were commonly 100m apart.
- Geophysics such as shallow seismic surveys were recommended
- In the actual construction of the sewers, mapping kept pace with the advance which allowed for a continuous geological section, albeit limited to one face of the sewer, to be compiled and added to the earlier drilling.

As a result of all this 1960's work, the geologists changed their (and our own) stance somewhat regarding the geology of the Bayside area:

- *"By decreasing the distance between drill holes from 1,000ft / 305m to closer to 100m, significant 'irregularities' in the Silurian surface become recognisable. For example, between bores CIS 17 and 18, a distance less than 100m, the bedrock falls 10.2m. The bedrock low is filled with highly porous and permeable limestone of Lower Tertiary age. This limestone also seen in CIS 15."* And: *"In various holes 'conglomerates' recovered on bedrock: CIS 12 between 7ft and 81ft (2m to 25m); CIS 11 58.5ft to 61.0ft (18m to 19m); CIS 18 between 84 ft to 85 ft. (25m to 26m)."*
- *"Tunnelling from Jasper Road. Channels of Tertiary sediments occur sporadically over 35% of the tunnel."*
- *"Tunnelling from Draper Street: Eastern Heading. Channels of Tertiary sediments have intermittently occurred in 51% of the tunnel. A single channel of Tertiary sediments, 35ft (11m) wide, cuts the tunnel."*
- *"From the previously constructed sections of C.I.S it has been shown that the Silurian/Tertiary contact is far more irregular than shown on original cross sections. 6 bores proposed (CIS 9 to 14) to more accurately delineate the Tertiary/Silurian".*

- *" The general area is located within the relatively flat flood plain of Dandenong Creek. Drill holes were sited approx. 1,000 ft apart. In hole 1/16 evidence of a post Tertiary stream bed between 12ft and 17.5ft (3.7m to 5.3m)."*
- *"The boring suggests that the old land surface carved from Silurian mudstones is practically flat. But the sinking of the caisson at Dowling Road found the surface of the Silurian beds not flat but varied in level by 15ft / 5m over 18ft / 6m. The material filling this old depression in the old land surface is well sorted, rounded gravel 1.3cm to 2.5cm in diameter. Bore 3/53 also struck this gravel, with the bore apparently near the southern edge of the depression. The gravel filled depression represents an old water course that wandered its way to the sea. It is at least 15 ft / 5m deep. Detection of an old water course, when covered by about 40m of other sediments including limestone will be most difficult and is to be the subject of further investigation"*
- *"The existing bores are not sufficiently close together to detect old water courses incised into the surface of the Silurian".*
- *"The Caulfield Interceptor Sewer (CIS) is situated within the Brighton – Cheltenham block which underwent several periods of uplift and basinward tilting during the Tertiary. These movements most likely led to the partial formation of incised streams in the Silurian rocks and certainly into various periods of marine transgression and regression. However, it cannot be stated whether the incised nature of the Tertiary / Silurian profile observed in the tunnel represents a likely or unlikely occurrence. This is due to a lack of detailed information on the nature of the Tertiary/Silurian contact across the Brighton – Cheltenham Block. Thus, it is not possible to determine if the occurrence of incised streams in the Silurian is characteristic of the Block as a whole, or whether such features are restricted to particular locations as a result of local, relative uplift of the Silurian. It is considered that the tunnel is situated on the edge of a stream valley eroded in Silurian sediments with the eastern end of the tunnel crossing the valley floor".*
- *"There is some evidence of 'valleys/depressions' between Brighton Fm and Newport Fm. e.g. Section 4 near Morey Road (found in tunnelling and not via drilling)."*
- *G4997 UR 1968/18. "The gravel filled depression represents an old water course that meandered its way across the old land surface. It raises the possibility of Tertiary sediments extending to tunnel level.....Detection of such an old water course will be most difficult.....the old land surface covered from Silurian mudstone, on which the Tertiary sediments were deposited, may not be as flat as the boring suggests"*
- *G5037 UR 1967/6. "The Cainozoic sediments consist of alternate sands and clays of the Brighton Group which overlie silty marine sands and clays of the Newport Formation. The boundary of these sediments has been recognised from the cores and in gamma ray logs. The gamma ray logs have proved very useful in determining the nature of the sediments and the probable thickness of the main aquifer which occurs in the Brighton group." We have found*

no mention in SRL Technical Reports K1 and K2 on any gamma logging associated with geotechnical drilling conducted as part of the EES. As only a handful of logs were included with the K1 and K2 reports, out of 340 drilled, it is also not possible for the reader to check on what down the hole geophysical logging was conducted.

- G32238. “....to cover the 13,000 feet of tunnel line likely to have old, buried water courses...”
- Anticipated Ground Conditions. Construction Geological report for MMBW by R.C. Gregg April 1969: *“It is a rather sobering thought that of a total tunnel section of 18,240 feet only 5,580 feet are in average to good tunnelling ground.”* Whilst this and some other comments are directed to tunnelling in Silurian bedrock, which is not to be intersected in the western section of the SRL tunnel, nevertheless it does illustrate that tunnelling is unlikely to be straight forward.

Reading the ‘References’ sections of TA K1 and TA K2 we can see no reference to any of the 1960’s reports associated with the SE Trunk Sewer. We find this concerning given the SRL passes through the same ground as the SE Trunk Sewer.

The various geological sections drawn in the 1960’s clearly show that the various interfaces between the Upper Brighton Group / Red Bluff Sands and the underlying Black Rock Sandstone is far from regular. This equally applies to the boundary between the Black Rock Sands and the underlying marine Fyansford sediments. We see this illustrated in the geological section: TA K1: *‘Figure 6.2 Geological long section between the SRL station at Cheltenham and the SRL station at Clayton.’* Intersecting any palaeovalleys during SRL tunnelling will have major groundwater implications.

Some time ago, we heard from a Senior Geologist at the Victorian Mines Department who was engaged in the search for groundwater across various golf courses in Melbourne in the 1960’s – 1970’s during a time of great drought, to include Royal Melbourne GC, Victoria GC and Metropolitan GC. He was also familiar with the work being carried out at this time on the SE Trunk Sewer. The SE Trunk Sewer is situated close to the western boundary of Metropolitan GC.

*“Metropolitan GC experienced a **significant** drop in their standing water level (SWL) when deep sewers were constructed in the 1960’s – 1970’s. This was due to the interface between the sewers and the bedrock sediments acting as a ready conduit for the groundwater, which found its way into sumps that was subsequently pumped away.”*

Reading the TA K1 and TA K2 reports we can only see mention of groundwater inflows INTO the rail tunnel and underground railway stations during construction, and during the later operational phase. There is no mention of groundwater loss via the interface created between the Brighton Group sediments and the outer walls of the rail tunnel. As, to our knowledge, it has not been addressed in the EES we cannot comment further other than highlight to you this major area of concern to us.

Our golf club does not want to see the Metropolitan GC ‘situation’ repeated.

ISSUES OF CONCERN

Repeat of the SE Trunk Sewer de-watering situation both during project construction, and when operational.

In the SE Trunk Sewer situation, in the South Oakleigh area, groundwater was pumped away never to be replaced.

From the Cheltenham SRL Station the rail tunnel dips at an angle down through Red Bluff Sands, into and through the same Black Rock Sandstones that form our golf clubs' main aquifer, and down into the underlying Fyansford marine silts. (*See: EES Mapbook. Vertical Alignment Plans. Map 1 of 38; and TA K1. Figure 6.2 Geological long section between the SRL station at Cheltenham and the SRL station at Clayton*) The lowest point of the tunnel in the entire section between Box Hill and Cheltenham is close to mean sea level, at the eastern end of this decline. (*See also hardcopy EES Summary Report. Page 8*)

The possibility of a parallel situation to that at Metropolitan GC and the SE Trunk Sewer cannot be discounted. We welcome detailed investigations and reporting into this aspect of the SRL East Development.

Groundwater drawdown association primarily with the construction of the Cheltenham SRL Station.

TA K2. 6.1.2.2 Groundwater receptors

The key groundwater receptors that Project works may impact at the SRL station at Cheltenham include privately-owned groundwater wells which are used to extract groundwater, or for investigation and monitoring of groundwater.

TA K2. 6.1.4.2 Potential impacts on groundwater wells

"Based on the modelled drawdown, construction of the SRL station at Cheltenham has potential to impact registered third-party groundwater wells used for consumptive purposes."

TA K2. 8.3.3 Potential impacts during construction

Based on the existing conditions, the potential impact associated with the Project is a change in groundwater levels which may in turn lead to:

- *a reduction in water availability for groundwater receptors including an existing groundwater well used for irrigation.*
- *Groundwater quality impacts due to disturbance of contaminated groundwater where land use may have caused groundwater contamination.*

It is important to realise, yet again, that the Brighton Group sediments that host our CGC/RMGC/SGC and VGC aquifers has water flow from the NE to the SW, into Port Phillip Bay. Cheltenham Station lies solidly in a NE direction from our golf courses. (*"Groundwater flow direction is, in general,*

topographically controlled and regional flow direction across the Study Area is in a southerly and south-westerly direction towards the coast.')

Groundwater loss during construction of the Cheltenham STL Station is well documented in the EES. The EES states: "*the unmitigated inflows and associated drawdown impacts are significant*".... "*It is anticipated that most of the groundwater will be disposed to sewer*". A figure of 233 Mega Litres is tabled as the expected groundwater loss. This is a significant amount of water which must have a negative bearing on the water table upon which the golf clubs rely.

Whether this groundwater loss is mitigated, and replaced with pumped, potable water either during the construction or for a period afterwards remains unclear to us. ("*Groundwater is able to flow laterally into the excavation through the Brighton Group Formation. It is likely that a drawdown mitigation scheme will be required to reduce potential adverse impacts associated with the predicted drawdown and changes to the groundwater flow field in the vicinity of contaminated groundwater plumes.*")

To our way of thinking the EES does not consider, in any detail, the 'downstream' area west / south-west of the Cheltenham SRL Station, towards our golf courses. The EES has not drilled any monitoring/observation bores in this direction. We consider this an omission, as we are equally likely to receive adverse groundwater to areas paralleling the SRL corridor, on which the EES report concentrates.

The EES makes general statements about the regional water table:

*"In the Regional model, which was run in steady state, the climate change impact of sea level rise was simulated. A 2150 maximum rise in sea level in Port Phillip Bay of 1.5 m was applied as a constant head. This resulted in a 0.3 m impact at Cheltenham station, which was allowed for in the groundwater level design. With respect to the variation in rainfall, and hence recharge, due to climate change the potential change in recharge rate using the median climate scenario results in a small decrease in recharge. During the calibration process, a range of recharge rates were evaluated and the potential climate change impacts were within the considered range. Hence **no change in recharge rate was simulated.**"*

TA K2. 6.1.2.1 Hydrogeological conditions:

Climate change predictions suggest a drier climate that leads to lower groundwater recharge and an estimated decline of 0.5 m in groundwater levels. Sea level rise is also predicted to influence groundwater levels at the SRL station at Cheltenham, with a possible increase of up to 0.3 m. Together with considerations of natural groundwater level variability and likely response to rainfall events, future groundwater levels may vary between 2.8 m lower and 2.2 m higher than current levels.

TA K2. 6.3.2.1.1 Hydrogeological conditions:

Climate change predictions suggest a drier climate that leads to lower groundwater recharge and an estimated decline of 0.5 m in groundwater levels. Sea level rise is not likely to influence groundwater levels at this location. Together with considerations of natural groundwater level variability and likely

response to rainfall events, future groundwater levels may vary from 3 m lower to 2 m higher than current levels.

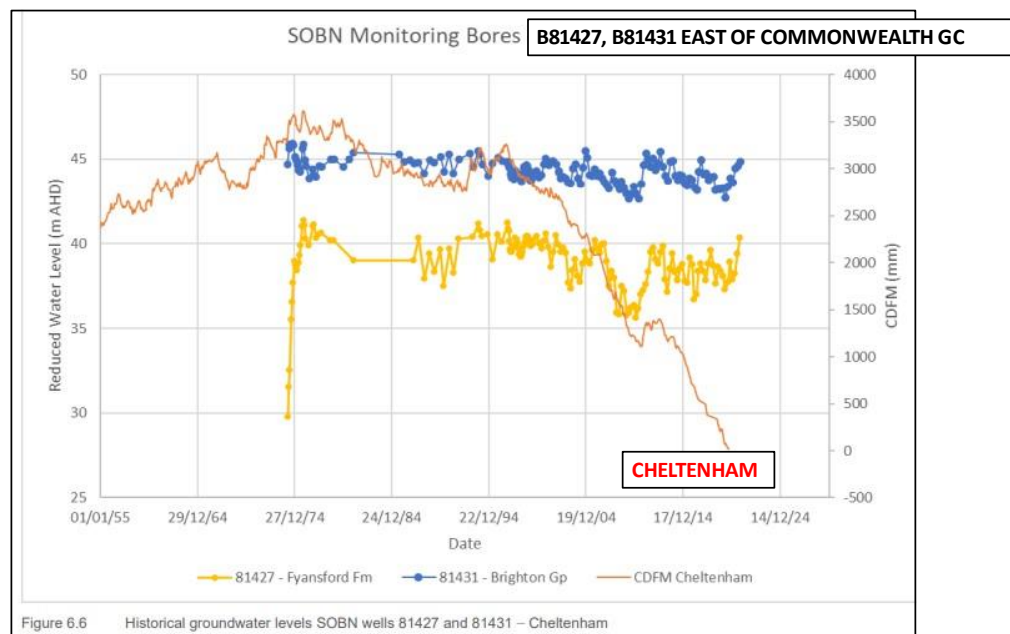
TA 1. 5.1.2 Future climate predictions

Sea levels will also rise in response to global and regional-scale changes in climate, and this is likely to be reflected to some degree in groundwater levels. The Victorian Coastal Strategy (DELWP 2014) recommends a sea level rise of 0.8 m for 2100 for planning purposes, although recent studies suggest sea level rise could be significantly higher. Based on consideration of new and improved models, Bamber et al. (2019)⁶ recommend using 2 m sea level rise by 2100 for planning purposes.

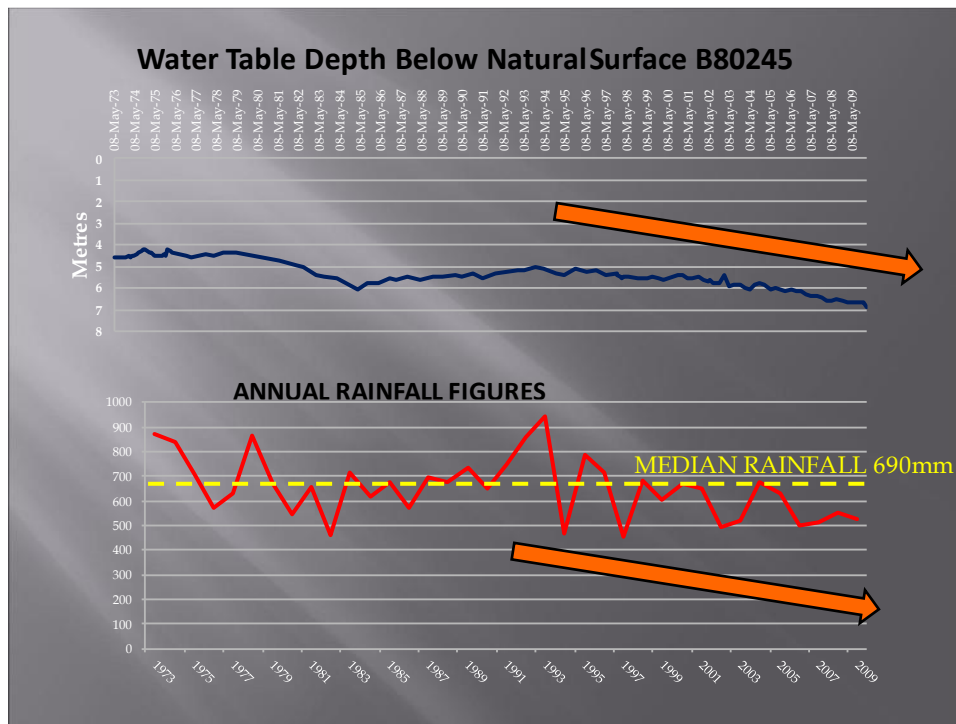
Design groundwater levels for the Project over the next 100 years have been estimated taking account of the influence of sea level rise, reduced rainfall/recharge, higher evapotranspiration, as well as changes due to infrastructure such as sewers. A maximum groundwater level rise of 2.5 m has been estimated over the design life of the Project.

TA K1. 6.2.3 Groundwater levels and flow

Nested SOBN bores approximately 5 km north-west of the SRL station at Cheltenham have been monitored since the 1970s and highlight a long-term declining trend in groundwater level in all aquifers since the 1970s (see Figure 6.6 BELOW). The magnitude of decline is fairly similar between aquifers (~1.5 m) and is consistent with the decrease in rainfall over the period November 1979 to May 1988. The decline is consistent with rainfall trends over that time.



This rate of drop is mirrored in State Observation Bore B80245 in Beaumaris. (Groundwater readings available 1973 to 2009). See figure below.



On our golf courses, borefield measurements show that in years with below average rainfall the water table continues to drop. Only in high rainfall years, such as 2010, 2011, does recovery occur. Since the 1960's, some 50 years ago, when we have records of SWLs in our bores, the water table has steadily dropped in line with both Figure 6.6, and Observation Bore B80245 above.

Adverse impacts to groundwater levels arising from the SRL will vest itself in a lowering of the Standing Water Levels (SWLs) in our bores. If SWLs drop in any meaningful way, then our upper Brighton Group aquifers may become 'dry' in the sense of productive long-term pumping.

As we continue to take SWL readings in our bores, we will be in an ideal position to monitor the SWLS during any construction phase of the Cheltenham SRL Station.

GROUNDWATER DRAWDOWN ONCE THE RAIL LINK IS OPERATIONAL, PRIMARILY ASSOCIATED WITH THE CHELTENHAM SRL STATION.

TA. K2. The **operational modelling scenario** was run for 100 years. Groundwater inflows into the Project during operation are shown in Table 9.1.

Calculated permissible groundwater Inflows.

Project element = CHELTENHAM

Footprint area = 7,761(m²)

Wall area = 3,959 (m²)

Permissible groundwater inflow = 0.86 (m³ /day)

Total Inflow 5.6 (m³ /day)

Being under the water table, the Cheltenham SRL Station and its surrounding infrastructure will leak water which will be pumped away to sewer. Only during the construction phase will the 'leakage' be quantified. Will this leakage be significant, remembering it will be continuous until the water table drops to the bottom of the station construction?

CONTAMINATION INTO OUR GROUNDWATER FROM THE FORMER LUCAS BATTERIES SITE AND THE FORMER HIGHTT GASWORKS, NOW THE SITE OF THE UNDERGROUND (SRL) CHELTENHAM STATION

Much is written in the EES about the high risk of contamination particularly during (and after?) construction of the Cheltenham SRL site.

TA. K2. (Section 1.6 Key Findings:

There is also potential for existing contamination to migrate towards the station box from the former Hightt Gasworks site, the former Lucas Batteries site (now Southland Shopping Centre), as well as other sites that have been used for light industry, manufacturing and fuel storage. The migration of contaminants associated with these sites presents a risk of harm to human health and the environment, which would require mitigation")

TA K2 6.1.2.3 Contaminated groundwater.

Areas of existing groundwater contamination and potential acid sulfate soil (PASS) have been identified as occurring or potentially occurring around the SRL station at Cheltenham. These were investigated further as disturbance of these sites may cause risks of harm to human health and the environment.

Existing conditions for these sites include the following:

- *Contaminated groundwater:*

> Numerous areas of known and potentially contaminated groundwater exist within 1 km of the SRL station at Cheltenham.

> Contamination is known to exist at two sites within 100 m of the proposed SRL station at Cheltenham: the former Lucas Batteries site and the former Hightt Gasworks. The presence of multiple groundwater plumes within close proximity of the SRL station at Cheltenham indicates a relatively high potential that these would be disturbed during the station's construction and operation.

Groundwater drawdown could cause the mobilisation of existing groundwater contamination or the activation of potential acid sulfate soil.

If this contamination reaches the Bayside Golf Courses two aspects should be considered. First will it pose a Health and Safety issue, and second will the bore water extracted still be suitable for our irrigation purposes?

A secondary situation arises. The area of VGC, CGC, SGC and RMGC lies in an area of low, 500 mg/L TDS values. Further east, along the line of the proposed tunnel, the TDS values rise through 1,000

mg/L TDS to >1,500 mg/L TDS. (Refer to Figure 6.7 in TAK1: Salinity of the watertable from regional mapping across Study Area for Bayside and Kingston local government areas (after FedUni 2015), with Project bore salinity data) A TDS value of 1,450 mg/L has been measured at Cheltenham SRL Station. Will the cone of depression centred on Cheltenham SRL Station promote the SW movement of high TDS groundwaters from the NE and E of Cheltenham?

We recommend that we have a robust collection of base line water quality/chemistry analyses against which water sampling at the time of station construction, and thereafter, can be compared.

GUIDANCE AVAILABLE FOR ASSESSING THE ACCEPTABILITY OF GROUNDWATER DRAWDOWN IMPACT ON EXISTING WELLS

K2. 5.2.3.1 Existing groundwater users. " Groundwater drawdown has the potential to reduce water levels in existing wells and impede the existing use of the wells. **There is limited guidance available for assessing the acceptability of groundwater drawdown impact on existing wells**, and therefore to determine what level of impact would require mitigation. However, the following objectives from DELWP's Resource Share Guidance (2015) are recognised:

- 'Maintain groundwater level so that any drawdown leaves sufficient saturated thickness to support current use'
- '...a change at the impact point that cannot be discerned from **background variability** or the limits of the **measuring techniques** – is considered insignificant'.

For consumptive uses such as irrigation purposes, a drawdown impact of less than 10% of available water column in **existing** wells is considered to satisfy these objectives and is adopted in this report as the threshold above which mitigation will be necessary."

We believe these 'mitigation criteria', and EES's references regarding 'saturated thicknesses' and 'water columns' can be improved upon.

EES writes: "There are several licensed wells beyond the predicted 0.5 m drawdown contour near Cheltenham Golf Club and ~~Royal Melbourne~~ Victoria Golf Club, the closest being WRK042457 (old Bore #5, no longer in operation), WRK042460 and WRK042461 (Cheltenham GC). Given that significant extraction can occur from these wells, there is potential for interference of drawdown cones around these wells and construction drawdown. As the wells all have a water column of around 35 m, this small drawdown is within acceptable limits (that is, less than 10% of available water column) and does not require mitigation."

At VGC, the replacement (WRK060523) for bore #5 has only 14m of water between the SWL and the bottom screen, not 35m. And further west Bore #3a / WRK042455 has only 7m of 'water column' from SWL to pump intake. If we lost 1.0m of water from Bore #3a it would become a borderline producer.

At CGC none of their three bores "have a water column of around 35 m".

There are differences comparing water levels in a dry, hot year where pumping is almost needed nonstop, and between wetter years when minimal pumping is required. Which 'baseline SWL figures' are EES to use?

Importantly, the down the hole geology is not constant. We rely on 'sandier intersections' +/- fracture intersections (of the type seen in coastal cliff exposures and rock platforms) in the otherwise unremarkable, sedimentary BRS sequences. Having a 1.0m drop can deprive us of our main source of water for some bores.

This change in geology is seen in the geological section (TA K1: *'Figure 6.2 Geological long section between the SRL station at Cheltenham and the SRL station at Clayton'*) in terms of the interplay of Red Bluff Sands / Black Rock Sandstones / Fyansford. We do not entirely agree with this section, in respect to the absence of Black Rock Sandstone BRS) over much of the western third of the traverse. Our bores clearly indicate the BRS plays a more significant role in this part of Bayside than the technical reports suggest.

We would argue the EES mitigation guideline of '>10% loss of water column' need to be refined to suit the existing Bayside Golf Course Irrigators. (See below for additional comments)

We note, as an aside, that the North East Link Project TA Report on Groundwater. pp 25/77 better defines this as: *"aquifer drawdown to pump intake, under the non-pumping condition."*

Whose responsibility is it to determine 'acceptable limits', the golf clubs or EES? This is important, especially, as we commented earlier, the EES has not drilled any monitoring/observation bores W/SW of Cheltenham SRL station.

Our recommendation is that EES cannot apply "Rural Water Corporation 1993 guidelines" to our bores. 'Length' in terms of a 'water column' needs to be further defined. Once the 'rules' are set in place then these would need to apply both to the CONSTRUCTION phase of the SRL and to the later OPERATIONAL phase. Modelling for the Operational Phase covers 100 years. This would suggest that 'future groundwater levels' for the area would have to be firmly established for both the construction phase and thereafter a 100-year operational period. SRL and the golf clubs would have to agree and document the 'guidelines (defined, we suggest, as the depth between the SWL to the pump inlet or bottom of screen, whichever is lesser) for all bores currently listed on the individual Water Licences.

CLOSING COMMENTS

With reference to the SRL East EES publication: SOIL AND GROUNDWATER , the Golf Clubs note:

- *"Since mid – 2019 we've engaged with over 20,000 people via online and face to face consultation"*. There has not been a single contact with the major golf course irrigators at CGC, RMGC, SGC, VGC even though several requests have been made to have a 'groundwater specialist' meet with us on-site.
- *"Key feedback relating to soil and groundwater...."* There are listed NO 'key feedbacks' for groundwater.
- *"SRL is committed to minimising impacts on soil and groundwater during the construction and operation of SRL East"....."Designing underground structures to minimise*

groundwater changes and the design and implementation of a monitoring program to verify that no significant impacts occur”.

Our submission is twofold. First, via direct consultation, we too want to ensure ‘impacts on groundwater’ are indeed minimised. Second, we ask to be part of any design and implementation of a monitoring program.

Kind Regards

Antonie Els
General Manager
The Victoria Golf Club

Request to be heard Yes

Full name: Juliana Aya
Organisation: Bayside City Council
Affected property:
Attachment 1: <https://engage.vic>
Attachment 2:
Attachment 3:
Submission:

DOC/21/388148

16 December 2021



Inquiry and Advisory Committee
Suburban Rail Loop East EES
c/- Planning Panels Victoria
Online submission via Engage Victoria

Bayside City Council
76 Royal Avenue
Sandringham VIC 3191
PO Box 27
Sandringham VIC 3191
Tel (03) 9599 4444
Fax (03) 9598 4474
enquiries@bayside.vic.gov.au
www.bayside.vic.gov.au
ABN 65 486 719 651

To the Committee,

**Suburban Rail Loop East Environment Effects Statement and Planning
Scheme Amendment.
Bayside City Council - Submission**

This submission is made by Bayside City Council in response to the exhibited Environmental Effects Statement (EES) for the Suburban Rail Loop East Project and draft planning scheme amendment GC197 (Amendment GC197).

Bayside City Council welcomes the opportunity to present its submission to the Suburban Rail Loop East Inquiry and Advisory Committee.

Council supports the Suburban Rail Loop East (SRL East) project and recognises the broader benefits that a transport project of this magnitude will bring to the Bayside and broader community. However, Council considers that a number of issues need to be addressed to deliver the positive outcomes the project intends while maximising benefits for our community and managing impacts and risks during construction.

This submission addresses the issues at a high-level Council considers need to be addressed in the EES and attached documents. Given the time limitations on the provision of this submission, Council would like to reserve its right to expand upon matters presented in this submission at the hearing. If required Council would also like to reserve its right to present additional suggested changes and respond to matters raised by other parties at the Inquiry and Advisory Committee hearing schedule to take place in early 2022.

Council will address the Committee in greater detail on the substance of these submissions in further written submissions at the time of the hearing.

Council's Advocacy Action Plan

The City of Bayside, Suburban Rail Loop Project: Advocacy Action Plan, seeks to guide Council's advocacy efforts through the different planning and delivery phases of Stage One: Cheltenham to Box Hill of the suburban rail loop project.

Aligned with the Community Vision 2050 and Council's Strategic Plans and Policies, the key objectives of the Suburban Rail Loop Project Advocacy Action Plan are:

- protecting community amenity during the various stages of construction;
- delivering of an integrated transport system;
- delivering a precinct that responds to the challenges of the future;
- effective collaboration and transparent communication and engagement;
- maximising economic and social benefits.

The Draft Advocacy Action Plan was presented to the community for feedback as part of a community engagement process between 6 September and 1 October 2021. A total of 112 submissions were received. A high level of satisfaction was expressed with Council's key advocacy objectives.

Additional comments related to:

- expressing disappointment with the loss of the open space and skate park at Sir William Fry Reserve to accommodate the new station and impact on flora and fauna
- increase of traffic in an already congested area;
- amenity impacts generated by construction workers;
- dissatisfaction with the lack of integration with the Sandringham Railway Line;
- wish the project could be delivered sooner;
- believe there is little benefit for the broader Bayside community; and
- will like to see additional detail provided on the design proposal.

The Project

At the outset and as a preliminary issue, Council questions whether the EES is satisfactorily resolved such as to proceed in the manner advanced before the Committee. Given that the project description is based on a reference design we question whether this is enough to fulfill the objectives of the *Environmental Effects Act 1978* and scoping requirements.

While we understand that the SRL East is a large and complex staged project, we believe that the flexibility provided to the Authority to deliver significantly different

works from what the reference design outlines, enabled via the exhibited Incorporated Document for the project, Environmental Management Framework (EMF) and associated Environmental Performance Requirements (EPR's), do not provide the certainty and detail required to understand the impacts and consider appropriate mitigation measures.

Council considers in its current form the EES does not satisfactorily ensure the Minister's intended benefits.

The Minister determined that an EES "will provide a transparent and integrated framework for assessing potential effects, taking into consideration design options, scheduling and mitigation alternatives for planning and delivery of the project, and an evaluation of the effectiveness of proposed measures to avoid, minimise, manage and offset environmental effects."

Impact Assessment

Table 1 below presents a summary of Council's issues and concerns and comments and suggested outcomes in response to each of the Impact Assessment Reports.

Table 1

Suburban Rail Loop East Environmental Effects Statement		
Topic	Issue/concern	Comment/ suggested outcome
Aboriginal Cultural Heritage	Council welcomes the preparation of the CHMP to appropriately manage the impact to unregistered Aboriginal cultural heritage if previously unknown Aboriginal heritage is discovered during the Project works.	<p>Council is committed to Aboriginal and Torres Strait Islander community and acknowledge Aboriginal people have a rich and continuous connection to the Bayside area.</p> <p>Council is currently preparing its second Reconciliation Action Plan with a focus on building the following three pillars of reconciliation:</p> <ul style="list-style-type: none"> • Respect • Relationships • Opportunities <p>Whilst Council acknowledges no registered Aboriginal heritage places are present within the SRL station at Cheltenham Study Area, Council encourages the SRLA to continue to engage with the Bunurong people of the</p>

		Kulin Nation and to appropriately integrate these three pillars throughout all stages required to deliver the project.
Air Quality	<p>Council acknowledges the Frankston Railway Line provides a buffer between Bayside residents and the proposed works. Impacts identified without the appropriate mitigation measures are high to medium risk to human health. Managing the high risk identified is imperative to protect the health and amenity of the Bayside community during all stages of construction.</p>	<p>Council suggests installing a shed is considered at the SRL Cheltenham site to protect the neighbourhood from dust, odours, light and noise while construction is underway. This method has proven to be highly effective as part of the Metro Tunnel construction.</p>
Arboriculture and Urban Forest	<p>The tree loss resulting from the SRL East project is significant. The SRL Cheltenham station study area alone is proposing to remove 62% of the trees mapped out of which 127 trees are identified as medium to high value.</p> <p>Council considers little to no height ought be given to impacts to lower and middle storey vegetation is not being considered.</p> <p>The social impact of tree removal/loss has been dismissed from the impact assessment.</p>	<p>The mitigation measure to include a requirement to develop a Tree Canopy Replacement Plan is supported. However, Council suggests the Tree Canopy Replacement Plan is to be developed in conjunction with a planting schedule and a costed maintenance plan ensuring ongoing viability. It is pointless to develop a plan if the trees fail to survive and thrive after their establishment period. Council considers the maintenance plan should be implemented and/or funded by SRLA.</p> <p>The tree canopy replacement target should be increased to 3:1 to achieve Bayside and Kingston's aspirations in response to the future management of its urban forest</p>

		<p>and climate emergency response.</p> <p>Species selected must consider the individual needs of Cheltenham and support a high level of quality habitat and habitat connectivity to support biodiversity corridors across the region.</p> <p>The understory vegetation should be considered as part of the Urban Forest Impact and included in the replacement and maintenance plan to support a healthy habitat.</p> <p>While Council recognises not all trees of high value can be retained, the proposed loss is significant, and all efforts should be undertaken to avoid as much loss as possible.</p>
Business and Retail	The focus of the impact assessment is to narrow.	<p>Council acknowledges that Southland Shopping Centre (being directly opposite to the proposed Cheltenham SRL Station) will undoubtedly experience a significant level of disruption during construction. For a project of this scale the impacts have the potential to be both adverse and far reaching. Council submits much greater consideration should have been given to the Bayside Business District and the Small Neighbourhood Activity Centre located in the corner of Bay Road and Jack Road, Cheltenham.</p> <p>The potential impacts identified in section 5.1.3 of the report apply to these areas, in particular <i>“The potential reduction of effective demand for businesses or retailers</i></p>

		<p><i>during the project's construction, because of access and/or amenity impacts."</i></p> <p>The role and function of the Bayside Business District as a regionally significant commercial precinct as identified in the Inner South East Draft Land Use Framework Pan should not be prejudiced or undermined unreasonably because of the SRL East works.</p>
Contaminated Land Impact Assessment	The risk assessment has identified the contaminated land condition of the project area has the potential to pose unacceptable risk to the relevant human and ecological receptors.	Council accepts the SRLA under the direction of relevant state agencies and legislation will apply the mitigation measures set out in the impact assessment to minimise impact on the environment and human health to ensure residual effects are negligible.
Ecology	The ecological value of Sir William Fry Reserve is recognised as not significant due to its highly modified environment. However, this should not be a justification to disturb the area more than what is reasonably required to deliver the project.	<p>While the current ecological value of Sir William Fry Reserve is identified as not significant, the SRL East project provides an opportunity to upgrade its ecological value by reinstating habitat and creating an environment that attracts populations of wildlife into the area.</p> <p>Impacts during construction should take into consideration so that these opportunities and not hinder the future of the reserve.</p> <p>Consideration should also be given to the value of Sir William Fry Reserve as a future contributor to a network of</p>

		biodiversity corridors in the region and beyond.
Electromagnetic Interference	The report does not consider the Cheltenham SRL station study area.	The impact assessment report should include the Cheltenham Study Area. Justification for not including this area in the impact assessment report should be provided in Section 6 of the report.
Greenhouse Gas	SRLA is committed to carbon neutral-operations. The total greenhouse emissions from the project through construction and operation are significant, estimated at 2,195,084 t CO ₂ e.	<p>Based on international climate science and modelling used in the “Community Climate Action Planning Project” led by SECCA, the remaining ‘carbon budget’ for the City of Bayside is 8,600 ktCO₂e from 2018–19. This is the total amount of greenhouse gas emissions that the whole of the municipality can emit if it is to make a ‘fair contribution’ to limit the global temperature increase to 1.5°C above pre-industrial levels.</p> <p>Council adopted a target to reducing greenhouse gas emissions by 75% below 2005 levels by 2030 and achieve net zero emissions by 2035 in November 2021.</p> <p>Support is provided for the delivery of a modal shift from private road vehicles to electrified public transport to support this target.</p> <p>In response to Bayside’s Climate Emergency response every effort should be made to secure the provision of 100% renewable energy for all stages of construction and operation of the project.</p>

		<p>Sustainable procurement that considers the use of low carbon materials and recyclable materials that support a circular economy should be prioritised.</p> <p>The impact this project will have on individual Council's Green House Gas emissions targets should not be undermined. SRLA should make every possible effort to eliminate construction related emissions from the project and report on established targets on a yearly basis for the life of the project (thought construction and operation).</p> <p>EPR's should be amended to provide clear targets and meaningful reduction in greenhouse gas emissions for the life of the project.</p>
Ground Movement	Impacts no greater than minor have been identified within Bayside. The impact of existing utilities within the study area are unknown and confirmation won't be available until the detailed design stage.	<p>This is a clear example where the reference design used to inform the impact assessment is insufficient to assess impact and therefore identify appropriate mitigation measures.</p> <p>Impacts to utilities infrastructure such as sewerage can have detrimental impacts to the community and the environment.</p>
Ground Water	The site at Sir William Fry Reserve has areas of unknown contamination as a result of previous and existing uses (Gas Works and Petrol Station) risk	A Ground Water Management Plan should be prepared to assess all activities along the SRL East that will pose potential impact to the water table and provide mitigation techniques to minimise impacts on ground

	assessments should be undertaken to understand any impacts on ground water.	<p>water dependant ecosystems and existing uses.</p> <p>The ground water network should also be mapped to understand broader impact as a result of contamination or mismanagement.</p>
Historical Heritage	-	No known heritage properties or places are identified within the study area as it relates to Bayside.
Human Health	A communication Strategy has not been identified to manage and minimise health risks on affected community members.	The impacts on Human Health need to be properly managed through ongoing communication to ensure potential risks can be made known and effectively managed.
Landscape and Visual	<p>The SRL Station and Cheltenham will significantly change the landscape with consequential substantial visual impact.</p> <p>The significant retaining wall proposed along Bay Road will result in an undesirable outcome that prevents the visual connection between Bay Road and Sir William Fry Reserve.</p> <p>Indicative station design does not seem to address the intent of UDS.</p>	<p>Council considers that while the scale of the proposed station may be of a moderate scale the visual impact cannot be described as moderate given the significant change expected at the site. In the interest of transparency, the development expectation of the Station precinct should be articulated to assess the true visual impact of the project.</p> <p>The loss of mature trees will change the existing landscape and visual amenity of the area.</p> <p>Changes to bus and pedestrian movements in the study area will also change the visual amenity of the area.</p> <p>If resolved effectively the visual and landscape impact can be positive and catalyse transitioning the area from a</p>

		<p>car-based environment to a more pedestrianised one.</p> <p>Council submits the visual and landscape impact cannot be assessed through a reference design which provides only the SRLA high level aspiration for the study area.</p> <p>The landscape and visual impact throughout the 6+ years of construction should not be understated.</p> <p>The Bay Road perimeter wall should be revised to improve permeability, legibility, safety outcomes and an overall good design outcome. The current outcome does not meet the requirements of the UDS at this location.</p> <p>The indicative design fails to address the requirements of Section 5.1 of the UDS: Providing a special character to the urban environment that reflects the unique aspects of that local place and community, while responding to and enhancing the surrounding public realm</p>
Land Use Planning	<p>The land use impact assessment is narrow in scope.</p> <p>The use of interim Land Use Plans and Open Space Management Plans do not provide an adequate impact assessment and mitigation outcomes.</p> <p>Compensation outcomes for the loss of</p>	<p>The land use impacts of a project of this scale are far reaching. The provision of transport infrastructure is known to drive land use and higher density outcomes as acknowledged in the project description.</p> <p>There is a real need to consider the potential land use impact on the Bayside Business District and its land use role as a regionally significant</p>

	open space at Sir William Fry Reserve are not articulated.	<p>commercial precinct as identified in the Inner South East Draft Land Use Framework Plan should not be undermined. This kind of inquiry has not been undertaken.</p> <p>It is for this reason the EES is unsatisfactorily resolved. The interim nature of the Plans do not provide an adequate assessment of impact. The EPRs do not provide sufficient information in relation to performance objectives and outcomes.</p>
Airborne Noise	The reference design fails to provide enough information to assess noise impacts	<p>Every measure should be taken to minimise amenity impacts in the area. If the use of an acoustic shed is not viable at this location, further options should be considered. This method has proven to be very effective in the construction of the metro tunnel.</p> <p>While the current hours of operation do not identify Out of Hours Works this can change during the life of the project and therefore the impact of Out of Hours operation should be considered.</p>
Social and Community	<p>Commitment for the provision/relocation of assets is not provided in the EPRs.</p> <p>The social impact for the loss of Open Space at Sir William Fry Reserve is not articulated.</p>	<p>The EPRs should be amended to ensure compensation and/or replacement of current and lost opportunity for the provision of future assets for the community in this location.</p> <p>The EPRs should allow for the provision of as a minimum to enhance the amenity of the remaining parkland at Sir William Fry Reserve to compensate for the Open Space Loss in an area</p>

		<p>identified as having a deficit of open space to meet the needs of the current and future community.</p> <p>Bayside City Council is willing to work in collaboration with Kingston City Council and the SRLA to deliver positive outcomes for the community in this area and support in principle the concept Masterplan prepared by Kingston City Council.</p> <p>It is recommended that the EPRs are amended to enable the inclusion of residual land from the project to achieve an integrated outcome. The process to achieve this outcome should be clearly articulated in the EPRs.</p>
Surface Water	<p>Lack of integrated Water Management/ Strategy to identify opportunities.</p> <p>The scope should be expanded include stormwater management from future developments in the station precinct.</p>	<p>An integrated Water Management Strategy should be prepared to outline the approach to water supply and disposal as part of the project.</p> <p>The future aspirations for the surplus land should be shared to ensure future implications and management can be considered in an integrated manner.</p>
Traffic and Transport	<p>Modal integration is poor.</p> <p>The impacts on the increased capacity of the SRL East network are not addressed.</p> <p>Improve integration between surrounding area and</p>	<p>The scope of the project should be expanded to look at the seamless integration of the Cheltenham SRL, Southland Railway Station, the Bus Interchange at Southland, prioritise walking and cycling access and opportunities to integrate efficient bus connections between Sandringham Station and Cheltenham SRL.</p>

	station/intermodal precinct.	<p>Infrastructure provided should enable opportunities to adapt to increasing demand.</p> <p>Consider integration of adjoining residential and commercial precincts to support walking and cycling to and from the station(s)</p>
Vibration and Ground Noise	<p>Information on affected properties is not identified.</p> <p>The assessment does not acknowledge impact of noise during construction to users of Sir William Fry Reserve in areas available during construction.</p>	<p>More detailed information should be provided in relation to affected properties.</p> <p>The safe and continued use of Sir William Fry Reserve during the 6+ years of construction needs to be outline in the EES and EPRs.</p>

Environmental Management

The intent of the Environmental Management Framework (EMF) as outlined in the exhibited material is to provide a transparent and integrated framework to manage environmental effects of the Project during construction and operation to achieve acceptable environmental outcomes. The proposed roles and responsibilities for environmental management and monitoring of the Project's environmental performance are also outlined in the EMF.

Council has a number of concerns with the regulatory framework including:

1. Lack of clarity on consultation requirements to sit alongside the Construction Environmental Management Plan (CEMP)
 2. No mention of a peer review process to provide assurance of appropriate management of key environmental aspects of the project.
 3. Too much is left for approval by the Minister after the Inquiry is completed
 4. Lack of accountability and consequence for SRLA to ensure delivery of acceptable Environmental Outcomes
-
1. Comprehensive Community and Stakeholder Engagement Plans (CSEMP) should sit alongside the CEMP to set out specific actions, requirements, and processes to engage with the community and other stakeholders. The CSEMP should include but not be limited to:

- a. procedures and requirements around notifications in advance of potentially impactful works (such as road closures or night-time noise);
 - b. management of the closure of the railway, pedestrian and cyclist access and roads;
 - c. changes to cycling and/or pedestrian access;
 - d. A complaints management procedure to ensure complaints regarding environmental performance during construction are logged, addressed and appropriately responded to in a timely manner.
2. The design, environmental management and monitoring approach to avoiding and minimising impacts to ground water and associated beneficial uses, as well the management of other critical environmental effects should be subject to independent peer review to ensure acceptable environmental outcomes are achieved.
3. While Council understands that subsequent approvals will be required after the Inquiry is completed, given the large number of items requiring approval we request that more certainty is provided in relation to the outcomes of what is being approved including, clear parameters to the environmental impacts and the level of consultation that will be afforded by the SRLA as part of the associated engagement processes.
4. The SRLA is established under the SRL Act as a legal entity with powers as the project manager, developer and planning authority for the Project and the surrounding precincts.

The regulatory framework should reflect the role of SRLA as the project manager and therefore accountable for all tasks related to the project. Consequences for not delivering acceptable environmental outcomes in accordance with the EMF should be included as part of the roles and responsibilities.

Urban Design Strategy

The project area identified limits opportunities to achieve Principles 3 and 4 of the UDS.

UD3 Urban Design Principle 3 Connected Places that are connected physically and spatially

Objective UD3.1 Linkages Improve people's ability to walk, cycle and access public transport within a permeable urban structure that offers safe and efficient links and reduces barriers to movement.

Objective UD3.2 Transport integration Facilitate seamless intermodal transfers prioritising public transport, walking and cycling networks, and design movement networks for safe interactions between transport modes.

Objective UD3.3 Legible Reflect walking and cycling desire lines, promote intuitive wayfinding, reduce reliance on signage and minimise visual clutter and obstructions to key views.

Objective UD3.4 Green network Facilitate green networks that link public and private open space and support urban ecology, biodiversity and cooling

UD4 Urban Design Principle 4 Accessible Places that are socially connected, enjoyable and easy to walk and wheel around

Objective UD4.1 Universally inclusive Enable all people to access, understand, use and enjoy spaces across the project area and surrounding precincts regardless of their age, size, ability or disability. To the greatest extent possible, move beyond baseline accessibility compliance towards support for genuine dignity, equity, social inclusion and independent mobility in the use of public places.

Objective UD4.2 Twenty-minute neighbourhoods Support and enhance convenient and desirable access to everyday services, facilities and key destinations within a 20-minute walking distance from home.

Objective UD4.3 Active transport Encourage walking and cycling for transport and recreation with integrated active transport infrastructure that can accommodate future growth and connects seamlessly with surrounding networks and with existing and proposed infrastructure.

Objective UD4.4 Safer design. Design places that feel safe for the community using them. Increase passive surveillance and decrease barriers to participation in public space by acknowledging and accommodating the specific needs and experiences of all population groups within the community.

The reference design does not seem to take into consideration the Project-wide requirements and benchmarks provided in the UDS. Concerns/Issues identified in Table 1 relate to:

5.1.2. Station buildings are well-designed to:

g. Contribute to perceptions of safety of adjacent spaces and streets

5.1.3. Station entrances are:

e. Well-integrated with adjacent streets and public spaces.

5.1.6. The design and execution of the station environs:

a. Responds to and is well-integrated with existing public transport interchanges

b. Includes well-integrated taxi, ride share, pick up and drop off facilities

c. Provides a positive user experience that addresses user needs including reliability, travel time, accessibility, comfort and convenience at the completion of the Project and during the redevelopment phase

5.1.7. Transfers between public transport systems and transport modes:

a. Are direct, efficient, comfortable, safe and legible

- b. Optimise outcomes particularly for cycling, walking and public transport
- c. Maximise neighbourhood connectivity and cater for walking and cycling desire lines including those connecting to cycle parking
- 5.1.10. Safer Design principles are incorporated to deter anti-social behaviour and create a welcoming user experience and safe environment that:
 - d. Maximises passive surveillance between public transport modes (for users and staff) to improve overall precinct safety
- 5.1.16. Station environs and interchange facilities have demonstrated capacity to support future service changes and technological advances
- 5.3.2. Opportunities are incorporated to reduce the impact of existing barriers to accessing public spaces.

A number of Management Plans to address the requirements identified in the UDS have not been identified in the impact assessments and EPRs.

Draft Planning Scheme Amendment (Amendment GC197)

Council has concerns with the drafting of the planning scheme amendment and incorporated document based on a reference design. The Minister has the powers to approve documents that can significantly defer to those exhibited in the EES resulting in significant different outcomes and for which a thorough process (EES) would have not been undertaken.

Council reserves its right to expand on this issue at the hearing. However, provide the following preliminary comments:

- The incorporated document should be amended to outline consultation with Council's in relation to (but not limited to), changes to the UDS, native vegetation removal, continued involvement in the UDAP to ensure consideration of local needs, including for the provision of a Council representative at the UDAP.
- The EMF and UDS should not be amended to the satisfaction of the Minister. We suggest that this is reconsidered given that the reference design under which this amendment is based on does not provide any certainty on the expected outcomes.
- Concern with the resource impact that administering the SCO will have on Councils. Threshold triggers should be identified to minimise planning permit triggers.

Public open Space Guidelines

This is another example where the EES is considered not sufficiently resolved. Finalising the Public Open Space Framework Plan and management plan at a later stage does not enable the consideration of mitigation strategies to address matters including opportunities to negotiate compensation and/or offsets for the partial loss of land for affected Councils.

The loss of Open Space at Sir William Fry Reserve and the impact that it has in an area where Open Space provision is already deficient to meet the needs of the growing community is not discussed.

Business and Residential Support Guidelines

The document does not provide the detail required to ensure affected businesses and residential owners have clarity about their rights and support available. Given the large number of properties affected by the SRL East this information is critical.

Please accept this submission as an interim officer submission, which is expected to be endorsed at a future meeting of Council.

Should you have any further questions, please contact me on [REDACTED] or via email to [REDACTED]

Sincerely,

[REDACTED]

Juliana Aya

Manager Urban Strategy