

**SUBURBAN RAIL LOOP EAST:  
ENVIRONMENT EFFECTS STATEMENT  
AND  
PLANNING SCHEME AMENDMENT GC197**

**SUBMISSION ON BEHALF OF  
MONASH CITY COUNCIL**

Draft 9 December 2021

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**Contents**

1. INTRODUCTION .....3

2. DIFFICULTIES WITH A REFERENCE PROJECT .....5

3. THE REGULATORY FRAMEWORK FOR THE PROJECT .....7

4. OVERVIEW COMMENTS IN RELATION TO GLEN WAVERLEY STATION  
PRECINCT .....10

5. OVERVIEW COMMENTS IN RELATION TO CLAYTON STATION PRECINCT .....13

6. OVERVIEW COMMENTS IN RELATION TO MONASH STATION PRECINCT .....14

7. LAND USE PLANNING .....15

8. URBAN DESIGN STRATEGY (UDS) .....19

9. BUSINESS AND RETAIL .....25

10. TRAFFIC AND TRANSPORT .....27

11. ARBORICULTURE AND ECOLOGY .....32

12. GREENHOUSE GASES .....34

13. SURFACE WATER AND GROUNDWATER .....36

14. AIRBORNE NOISE .....38

15. VIBRATION AND GROUND-BORNE NOISE .....40

16. AIR QUALITY .....42

17. PLANNING SCHEME AMENDMENT .....43

## December 2021

Inquiry and Advisory Committee  
Suburban Rail Loop East EES  
C/O Planning Panels Victoria  
MELBOURNE  
VIC3000  
**Email: ##**

Dear Sir/Madam

**Suburban Rail Loop East EES and Planning Scheme Amendment  
Monash City Council - Submission**

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**1. INTRODUCTION**

This submission responds to the exhibited Environment Effects Statement (**EES**) and draft planning scheme amendment GC197 (**Amendment GC197**).

At the outset, Council wishes to confirm its support for the Suburban Rail Loop East project (**Project**) and its desire for the Project to proceed. Council considers the proposal to have three stations within the City of Monash, at Glen Waverley, Clayton and Monash, to be exceedingly positive. The Project will have significant benefits which include:

- increased transport choices for the community;
- rail based services to the Monash National Employment and Innovation Cluster (**NEIC**) that have previously not been provided; and
- opportunities for uplift and improvement in two key activity centres at Clayton and Glen Waverley.

However, Council has identified a number of issues and improvements in the draft EES and Amendment GC197, which it considers need to be addressed in order for the Project to proceed in a way that delivers an acceptable outcome and in order to minimise the environmental effects of the Project. Council considers the Project to be capable of delivering a benefit to the whole of the City of Monash, rather than just the three precincts in which the stations are located. In making this submission, Council seeks to raise issues or propose modifications which Council considers will ensure that the benefit of the Project to the City of Monash as a whole is realised.

Throughout the submission, we provide proposed amendments and additions to the Environmental Performance Recommendations (**EPRs**) contained within the Environmental Management Framework (**EMF**) that is to be given effect via the primary Incorporated Document. Given the time limitations on the provision of submissions, these do not represent the complete suite of amendments sought by Council. Council will expand upon its submission at the hearing.

This submission also identifies issues arising from Amendment GC197 and, in particular, the *Suburban Rail Loop East Incorporated Document* (**Project Incorporated Document**) and the *Suburban Rail Loop East Infrastructure Protection Incorporated Document* (**Infrastructure Incorporated Document**), that are intended to be incorporated into the Monash Planning Scheme and other planning schemes.

From the outset, Council has liaised with the Suburban Rail Loop Authority (**SRLA**) about the Project and the management of potential issues affecting land within the municipality predominately through the Technical Reference Group (**TRG**). While the Project is being planned following its approval as apparently intended, and then subsequently constructed, Council considers that it is essential that Monash City Council (and all affected councils) are provided a consistent statutory basis for consultation and review, particularly where Council land and Council's operations will be directly affected by the Project.

This submission is not intended to be exhaustive and Council reserves the right to expand on these matters, and respond to any other matters raised by parties at the IAC hearing in early 2022.

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## 2. DIFFICULTIES WITH A REFERENCE PROJECT

Council has found it difficult and in many cases impossible to understand the likely environmental impacts of the Project due to the project being only a Reference Design.

All the Project elements in the Project Description are based on a **reference design** that has formed the basis of the impact assessment presented in this Environment Effects Statement (EES). The reference design is not the final design for the Project, but it demonstrates a feasible way to deliver the Project and achieve acceptable outcomes.

The Environmental Management Framework also makes reference to the reference design.

The Reference Design is merely one feasible way to deliver the Project and not necessarily what will be constructed. This is also evident in the Incorporated Document for the Project which when examined closely in terms of its own content, and that of the EMF and the EPRs, provides flexibility to permit a significantly different project from the Reference Design with vague and inadequate consultation processes.

In addition, the level of detail and material available for review as part of the EES in respect of the Reference Design is in many respects vague and uncertain. This has effectively required Council, as a submitter, to respond to something more akin to a prospect or ambition rather than specific works or a specific identified impact.

The Inquiry into the North East Link Project (**NELP**) identified the dangers and difficulties in using a reference project to conduct an EES rather than an actual proposed project. For instance: (summary page iv)

“Having made the general findings above, the IAC’s strong view is that the Reference Design approach to Project assessment has generated serious challenges for such a large and complex project as this in an established urban area. This method, using a Reference Design, was contemplated in the Scoping Requirements; but importantly was not required.

Some of the concerns with the Reference Design are outlined in Section iii above, in relation to uncertainty. Perhaps the most obvious illustration of this relates to visual impact and urban design. Multiple experts for the Proponent and submitters attempted to have an intellectual discussion about how the Project may look, and what its impact may be. In the absence of an actual project, this is patently a difficult exercise.

Tangible effects of using the Reference Design approach were obvious during the Hearing. The uncertainty in the community amongst businesses, schools, groups and landowners, in the absence of a tangible project design and thus the knowledge of the actually proposed, as opposed to possible, impacts is difficult to overstate. This coupled with limited opportunities to participate when the ultimate design is progressed creates an atmosphere which may unnecessarily cause social concern and social impacts which could be alleviated by providing more detail.

The Proponent submitted that the Reference Design approach is well established in Victoria. The IAC does not agree. While it has been used to evaluate some recent infrastructure projects, it is still a comparatively new approach that has been used only for State-led projects with varying degrees of detail and with varying degrees of success. Moreover, the IAC considers it is an approach to Project assessment that should be used with great caution in future and confined to projects with limited footprints and potential for impact.”

In finalising the Scoping Requirements and the Public Works Declaration, the Minister does not appear to have given proper consideration to the considered report of that Inquiry, and neither has the SRLA taken that into account in formulating the project (or works) for assessment with sufficient clarity to enable a comprehensive assessment consistent with the objectives of the Environmental Effects Act and the Scoping Requirements. Consequently, the EES is merely the assessment of a concept rather than an assessment of a proposal or proposed works. The result is that the EMF and the EPRs are being required to do a significant amount of work dealing with a series of prospects and unknowns.

Council reserves its rights in relation to the efficacy of using the EES process in this way having regard to the requirements of the *Environmental Effects Act 1978* properly applied.

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### 3. THE REGULATORY FRAMEWORK FOR THE PROJECT

The proposed regulatory framework principally comprises:

- The Project Incorporated Document and the various management, surface and tunnel plans that it refers to;
- The EMF required by clause 4.4; and
- The EPRs that must be included within the EMF.

The key concerns with the regulatory framework are:

- There is a lack of central responsibility for compliance, which should be with the Authority and not contractors;
- Too much is left to approval after the Inquiry is completed;
- Too much is left to approval by the Minister;
- Having regard to the above, insufficient consultation and engagement provisions are built into the regulatory framework; and
- The drafting of certain parts of the documents is too broad.

#### **Lack of prime responsibility role of the Authority during implementation**

Generally speaking as a whole, the proposed regulatory framework and the way it is presented in the EES is difficult to navigate. Ultimately however, it sets up framework of bureaucracy and process which leaves affected parties having to deal directly with Project contractors in the context of there being a lack of targets and clear standards for compliance and a lack of consequence for non-compliance.

The regulatory framework as described above provides no clear statement of responsibility and accountability and even less so, consequence. The experience of others in similar projects with a similar regulatory framework is negative. Council is concerned that going forward it will become embroiled in a framework of buck-passing of responsibility all the while detrimental impacts continue to accrue and remain unresolved.

The SRLA is established under the *Suburban Rail Loop Act 2021 (SRL Act)* as a legal entity which is then invested with powers as the project manager, developer and planning authority for the Project and the surrounding precincts.

In so far as the SRLA is identified as the project manager, it is critical that it takes prime responsibility and remains the sole contact point for persons affected by the Project and any of the works comprising the Project. It ought then take matters up with relevant contractors pursuant to its contractual arrangements with the contractors. Instead, the regulatory framework requires affected people to engage with contractors which are required to put in place customer complaints mechanisms akin to a department store or any other organisation dealing with an aggrieved customer. (refer for example to EMF4 for complaints management in organisations)

#### **Lack of specificity in the EMF**

The EMF and EPRs do not contain adequate identifiable standards and instead make reference to vague concepts of minimisation and avoidance. Many key aspects of the Project are to be left to a later consent process to resolve.

Critically, the regulatory framework as described above, consequential upon the fact that it is merely a facilitative framework for a yet to be determined project, provides no level of certainty or assurance

to stakeholders and Council, in particular, that the Project will not have a substantial detrimental impact upon the environmental conditions of the affected communities.

Council requests that the Inquiry recommend a more determinative, transparent and easily navigable regulatory framework that:

- identifies the SRLA as the prime go to person for any interface between affected parties and the project;
- requires all aspects of the regulatory framework including all plans, management plans and framework documents (such as the urban design framework) and all Australian Standards and other reference documents to which the various regulatory documents make reference to, to be freely available for viewing on the SRLA website;
- includes EPRs with clear standards and limits, not targets, that must be met by relevant facets of the Project;
- sets out a clear enforcement mechanism; and
- provides for all auditing reports to be publicly available when submitted.

### **Subsequent approvals**

Based on our review of the EMF, the following items require subsequent approval:

- Surface and tunnel plans;
- EMF;
- Urban Design Strategy;
- Urban Design and Landscape Plans; and
- Native Vegetation Removal.

Furthermore, under the EMF, (which is to be approved by the Minister after the Inquiry is completed) the following items will require preparation (apparently by the contractor):

- Construction Environmental Management Plans;
- Operational Environmental Management Plan;
- Urban Design and Landscape Plan;
- Worksite Environmental Implementation Plans;
- Plans to comply with EPRs;
- Environmental Strategy;
- Communications Stakeholder Engagement Plan; and
- Sustainability Management Plan.

Accepting that it is necessary to have certain plans prepared subsequently, the regulatory framework needs to provide more certainty in relation to the outcomes of what is approved and identify clear parameters for the environmental impacts of what can be approved.

### **Process Improvement**



The Project comes after a similar project in the form of the Melbourne Metro Rail Project (**MMRP**), which, although comprising a different scale, involved a similar concept of twin tunnels and station boxes in a heavily built-up environment comprising a range of uses including sensitive receptors.

While EPR EMF3 requires the appointment of an independent auditor to:

Verify there are processes in place to identify opportunities for continual improvement in environmental management, performance, legislative and policy compliance -

Neither the EES nor the background reports demonstrate analysis of the experience arising from the MMRP, nor identify any lessons learned from the implementation of that project. There is no analysis, for example of the reports of the auditor in the MMRP to understand the issues that arose in the implementation phase of that project, whether the EPRs provided sufficient guidance for example, or how the processes put in place for that project are improved upon in this Project to assist in mitigating the environmental impacts which have been experienced in that project.

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## 4. OVERVIEW COMMENTS IN RELATION TO GLEN WAVERLEY STATION PRECINCT

### **Undergrounding Glen Waverley Station**

The EES shows Glen Waverley SRL station on land bordered by Kingsway, Coleman Parade, Bogong Avenue and extending under Montclair Avenue. North of the station is the existing Glen Waverley Metro station, which is currently above ground but is proposed to be lowered below ground in the future much in the same way as Box Hill Station has been lowered with the subsequent provision of development airspace above the station.

The Glen Waverley SRL station precinct sits within the Glen Waverley Activity Centre, the development of which is guided by the Glen Waverley Activity Centre Structure Plan (**GWAC Structure Plan**). The GWAC Structure Plan was adopted by Council on 30 September 2014 and on 25 January 2018 Amendment C120 was gazetted which incorporated the GWAC Structure Plan into the Scheme.

In terms of the Project itself, planning and building activity to date, over many years, has anticipated future lowering of Glen Waverley station below ground, to enable better movement and circulation, activation of land over the station, and pedestrianisation of the centre of the precinct (centred on Kingsway). The Project triggers changes (particularly potential loss or relocation of parking, and poorer vehicle circulation) which Council considers can best be addressed by lowering the Glen Waverley Metro station as originally planned. The EES has failed to engage with this longstanding planning for the area and while also not ruling it out has simply created uncertainty going forward. The lack of engagement with this important initiative will potentially close off options to provide and facilitate a direct passenger transfer connection between the Project and Metro stations below ground.

### **Lack of an interchange with Glen Waverley Station**

The Public Works Order for the EES identifies the various works as comprising the SRL railway stations and an interchange at several stations including Glen Waverley. However, the EES has only proposed a surface level connection between the SRL Station at Glen Waverley and the Glen Waverley Metro station.

### **Construction Impacts**

Additionally, Council is concerned with the impact of the Project on Montclair Avenue and Kingsway, both which are pedestrian focused. The proposed location of pick up and drop of spaces on Montclair Avenue as well as the routing of construction traffic and rail replacement buses along Montclair Avenue and Kingsway will have a significant impact on the central retail and entertainment spine, as identified in the GWAC Structure Plan.

### **Lack of replacement car parking**

Another concern is that the EES does not address the requirement for the replacement and planned additional public car parking spaces within the south west area of the GWAC. The GWAC requires a minimum of 706 car parking spaces to be located south of the Glen Waverley rail line, west of Kingsway and within the Activity Centre. Council proposed that a multi storey car park at 31-39 Montclair Avenue would provide these 706 car parking spaces, which consisted of maintaining existing car parking numbers (including facilitating 100 car spaces so as to realise the Kingsway revitalisation project that would include car parking removal and the footpath/public realm increased in size) and an additional 274 car spaces directly related to contributions made/to be made by traders as a result of planning permit requirements. The plans to deliver these car parking spaces have been terminated given the potential acquisition of the land by the SRLA. Whilst Council is seeking to replace some of these car parking spaces at a significantly increased cost at its Bogong Avenue multi storey carpark, the lack of available, opportune land to deliver the further replacement/additional car spaces as planned and as expected and contributed to by traders remains a significant concern that needs resolving. In the circumstances the SRLA needs to resolve the replacement of at least

300 at-grade local car parking spaces to facilitate the overall provision of 706 car spaces for the GWAC as part of the EES.

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## Business Impacts

Further, as discussed in more detail below, Council is very concerned that the Project's impacts on Glen Waverley during construction will materially impact upon trading conditions of the businesses within the Glen Waverley Activity Centre. Especially coming off the back of a most extraordinarily difficult period over the last 18 months, the stamina of the local businesses and their ability to endure further impacts on trading conditions is at a critical level. Importantly, Council notes that the assessment of economic impact in the EES is focused on the loss of the employment from the removal of the RSL. There is limited to no assessment of the overall potential economic impact during construction on Kingsway businesses. Council considers that the Kingsway businesses will be impacted by:

- the removal (and as yet unresolved/unidentified location(s) for replacement car parking spaces) of "at grade" Montclair car parking spaces, which comprises approximately 300 convenient high turnover spaces and was the proposed location for a further 274 spaces that are required to be provided as a result of planning permit contributions made by traders;
- noise, vibration and dust during construction will negatively impact the amenity of Kingsway discouraging customers and directly impacting businesses; and
- proposed haulage routes along Coleman Parade, Montclair Avenue and Kingsway will create significant negative amenity and traffic disruption in Kingsway.

Council considers the EES lacking in not addressing the above issues which are likely to result in job losses and potentially business closures in the Kingsway Precinct due to construction related activity. No evidence has been presented to demonstrate that the Project will support any real economic benefit to the Kingsway area or the broader Glen Waverley Activity Centre.

Having regard to these issues, Council considers that a modification to the EES or a supplementary EES with a modified Glen Waverley SRL station which provides for the lowering of Glen Waverley station, addresses the impact on Montclair Avenue and Kingsway and addresses the provision of the required 706 car parking spaces, inclusive of the replacement of 300 at-grade local car parking spaces, 274 planned additional car parking spaces, the removal and replacement of 100 car spaces from Kingsway to facilitate the Kingsway revitalisation project, as well as further consideration of the business and retail impacts, is required before the Project can be assessed.

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## **5. OVERVIEW COMMENTS IN RELATION TO CLAYTON STATION PRECINCT**

The EES shows the Clayton SRL station on land bordered by Clayton Road, Medline Road, Carinish Road and with alignment to Lilian/Wright Street. The Clayton SRL station is proposed to interchange with the existing Clayton Metro station through a concourse.

The Clayton SRL station precinct is within a Major Activity Centre in Plan Melbourne and is also part of the Monash NEIC. Further, the Clayton Activity Centre Precinct Plan 2020 was adopted by Council on 28 January 2020 to guide the future growth of Clayton.

Council notes that the EES states that the road network will function satisfactorily with the closure of the central part of Carinish Road. While Council acknowledges the benefits of this from a public realm perspective at the proposed SRL station, Council has concerns about the potential redistribution of traffic and impacts on the outcomes of the Clayton Activity Centre Precinct Plan 2020. Council considers further detail is required to be provided through the EES to establish that the potential traffic impacts will not have an unacceptable impact on the precinct, and in particular, on businesses within the Clayton Major Activity Centre.

While Council acknowledges the potential public realm benefits at the proposed SRL station at Carinish Road, Council is concerned about the significant negative impact upon the public realm at the Remembrance Gardens and the associated loss of parkland and tree canopy. Council considers that modifications should be made to the Project to reduce the loss of trees and open space.

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## **6. OVERVIEW COMMENTS IN RELATION TO MONASH STATION PRECINCT**

The EES shows Monash SRL station on land bordered by Howleys Road and Normanby Road. It may include a connection to Monash University.

The effects of the Project and associated development at the Monash SRL station precinct will see a significant employment growth from 2041 – 2056, with significant active transport investment required in the station precinct to facilitate this whilst maintaining its place function.

Maximising interchange between the proposed Monash SRL station and other public transport modes, including buses and a potential trackless tram proposal from Caulfield to Rowville, should be a key consideration.

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## 7. LAND USE PLANNING

### Council's concerns

The EES overview of the Project states:

“Suburban Rail Loop is a multi-decade, city and state-shaping program of investment that would transform Victoria’s public transport system and transform how Victorians move around the city and State. SRL is more than a rail line - its social benefits will be profound and long lasting. Victoria is expected to grow to 11.2 million people by 2056 and Greater Melbourne will reach around nine million people – a similar size to London today. SRL is a once-in-a-generation opportunity to get ahead of the curve – recalibrating where and how our city will grow in the decades ahead. The social benefits would be realised over decades, including fairer and more equitable access to employment opportunities, education, health and affordable housing for thousands of Victorians.

SRL would transform Melbourne into a ‘city of centres’ – supporting vibrant suburbs outside the central business district (CBD) and inner city that will provide high quality jobs, greater housing choice, green and open space in attractive, highly accessible neighbourhoods.”

Council agrees that the Project has the potential to be city shaping. While the Project itself will be a significant element and catalyst for that city shaping to take place no amount of hyperbole will result in the achievement of the vision. The subsequent process of precinct planning which we understand will commence only after the Project is approved will be straddled with the implications of decisions made now as part of the Project. In that regard, the Project is critical to putting the essential elements in place of what could then truly become in the case of Glen Waverley, a transformed vibrant centre for the eastern metropolitan region to complement the CBD providing high quality jobs, greater housing choice green and open space in attractive highly accessible neighbourhood.

As it stands, the Project will link the existing railway lines and it is understood that the SRLA is proposing substantial new intensive development within the station precinct. That of itself is not the major benefit of the Project. The major benefit is what is could actually be created subsequently in the form of an outstanding *fully integrated* activity centre at Glen Waverley that has all the elements and structural conditions in place upon which to build a centre unequalled in location, form and its ability to do far more than what is currently imagined.

The *Land Use Planning Impact Assessment* in the EES finds that the Project can meet the evaluation objective set by the Minister for Planning to: ‘*Achieve integration with adjoining land uses, minimise displacement of land use activities and key infrastructure and resolve inconsistencies with strategic land use plans*’. However, it is considered that the impacts of the Project are significant and threaten the realisation of Council’s adopted vision for the staged, revitalisation of the activity centre by physical integration of the two parts of the centre, north and south of the Glen Waverley Metro Railway Line and the communities either side.

The realisation of the full potential of the vision set out in the GWAC Structure Plan (extract below) is dependent upon the staged upgrade and intensification of four inter-related land uses:

- public transport;
- the road network and public realm;
- retail and entertainment; and
- mixed use development.

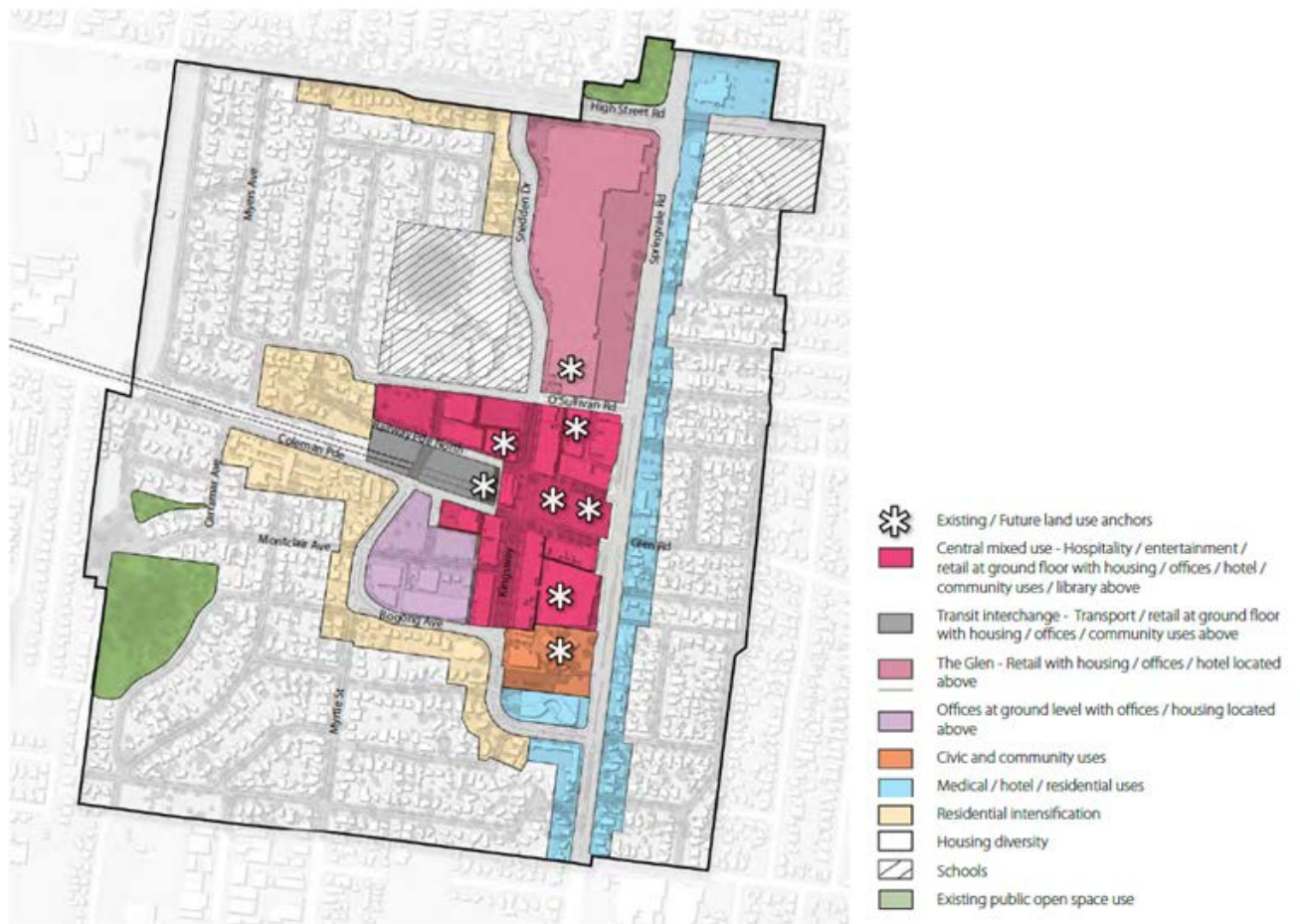


Figure 8: Land Use Plan

The key aspects of the GWAC Structure Plan identified in the above extract of the plan are:

1. deliver a centrally located and integrated public transport hub;
2. upgrade the core retail and entertainment spine;
3. intensify business and residential uses at key development sites; and
4. redirect through traffic away from the retail and entertainment spine.

In the above context, the Project presents several land use planning challenges for the Glen Waverley Activity Centre including:

- no delivery of an integrated and revitalized transport hub for the activity centre but rather a new station which lacks integration with the existing metro station and bus interchange;
- a lack of integration of the new station with Council's proposed upgrade to the Kingsway spine;
- no delivery or protection of the potential for delivery of an integrated transport hub and associated air rights development over the existing Monash SRL station; and
- no provision for the release of land for the activity centre ring road which is required to redirect traffic to the perimeter of the centre with associated parking and to deliver a safe, walkable and cycle friendly centre (as outlined in (Appendix 1) *Glen Waverley Station 'Go Below'*).

The GWAC Structure Plan identifies the following ring road staging for Glen Waverley:



## RING ROAD STAGING

The proposed Ring Road will need to be delivered across a number of stages which will see the key commercial area streets improve for pedestrians and through traffic gradually removed. The diagrams below outline the key stages.

It is noted that, if the opportunity arises to redevelop the railway station and bus interchange precinct with the required grade separation of the Ring Road and railway line, these would could be undertaken at any time.

### STAGE 1



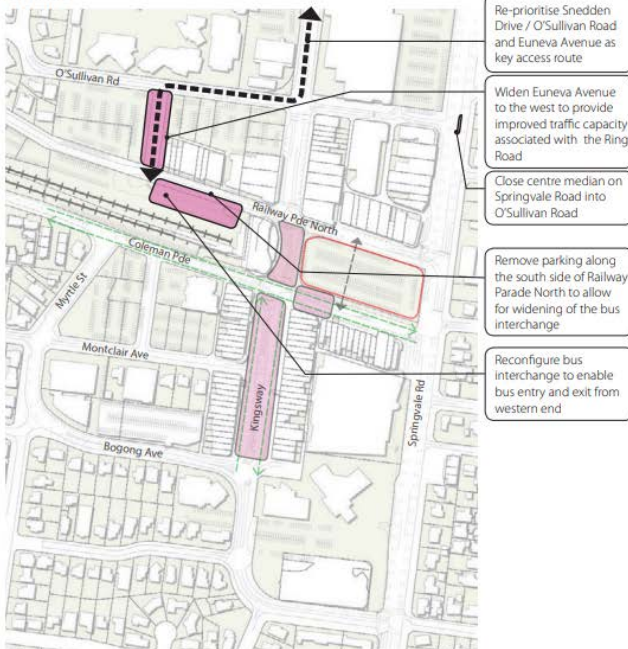
### STAGE 2



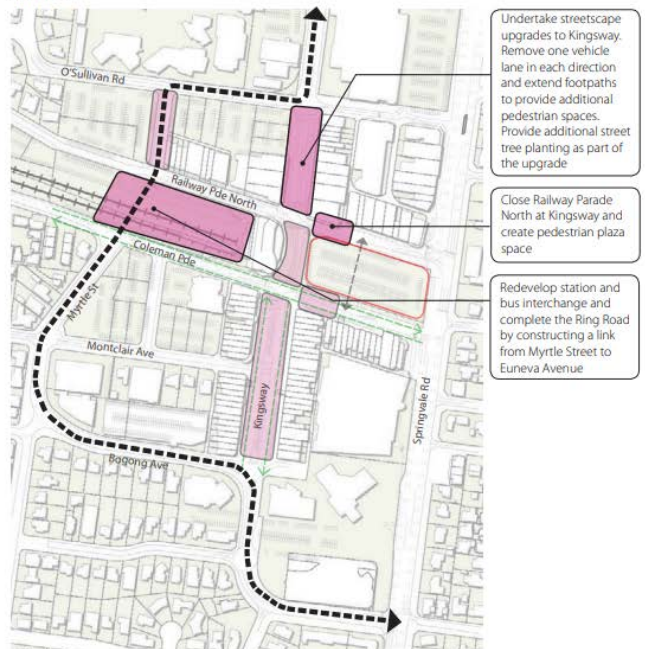
Figure 14: Ring Road Staging Plan

42 Glen Waverley Activity Centre STRUCTURE PLAN - September 2014, updated June 2016

### STAGE 3



### STAGE 4



Glen Waverley Activity Centre STRUCTURE PLAN - September 2014, updated June 2016

## Recommendations

The Glen Waverley Station precinct is unique in being flanked by large footprint development sites which are in public ownership.

If the various initiatives of the Project are properly targeted and co-ordinated, the Project presents a key opportunity for government authorities to deliver a flagship, transport-oriented development precinct in keeping with international standards.

Accordingly, this submission requests that the EES be amended or a supplementary EES be prepared so as to either deliver or make provision (by not closing off the options) for the delivery of a lowered Glen Waverley Station with the ability to provide development over and a continuation of a ring round to link the north and south components of the activity centre.

An attached preliminary concept plan (Appendix 1- *Glen Waverley Station 'Go Below'*) identifies the key moves that are required for Glen Waverley.

An attached Infrastructure Plan (Appendix 2 - *Glen Waverley Station Precinct Infrastructure Upgrade Requirements*) also identifies the key infrastructure requirements that are required for Glen Waverley.

## 8. URBAN DESIGN STRATEGY (UDS)

### Council's concerns

Council submits that the references in the UDS are too broad in nature. The level of detail required for Council (and the public generally) to be able to consider whether the impacts of the Project are acceptable, is not there. Council submits that the UDS should include key performance measures that meet best practice to ensure the works and outcomes can be monitored and measured against relevant standards (in both design and construction). The principles noted in the UDS are not enough. Without performance measures, it is very difficult to confirm whether the Project will address them. Providing for performance measures will also enhance quality, spatial outcomes and consistency with integration into the public realm referenced.

#### Glen Waverley

Council has particular concerns in relation to the UDS as it applies to Glen Waverley, where the GWAC Structure Plan is predicated upon the delivery of an *integrated* transport hub which supports and services a high density, commercial and residential activity centre and 24/7 economy.

The GWAC Structure Plan vision describes Glen Waverley as characterised by its liveability, cultural diversity and high quality, pedestrian and cycle friendly public realm:

“Shops and services will increase in range and diversity and the quality of activities and experiences will improve to meet the needs both of a growing number of local residents and workers, and visitors... High quality and diverse housing options will be available for a greater number of residents with a range of housing needs. Improved and additional open space and plazas, along with community and physical services will be in place for the local residents, workers and those who visit the centre.”

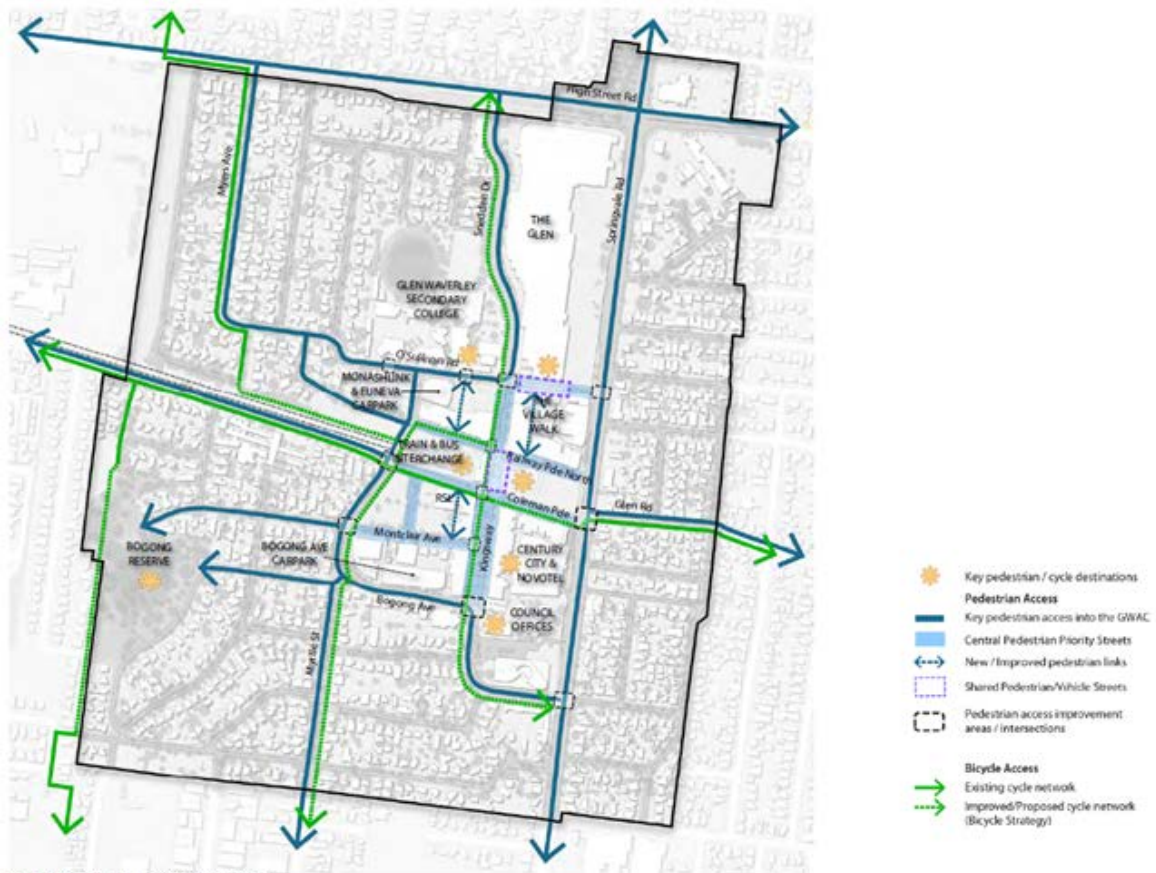


Figure 12: Pedestrian and Cycle Access Plan





Figure 11: Public Realm Plan

Over the past twenty years, Glen Waverley has been transforming from a suburban retail centre to a high density, commercial and residential hub servicing the adjacent Monash NEIC.

The Project must ensure that over the next twenty years, this process of transformation can continue whereby Glen Waverley will become a decentralised, 24/7 urban hub with associated levels of activity and activation.

The GWAC Structure Plan vision for a regional urban hub at Glen Waverley is reliant upon:

- creation of a user-friendly and integrated transport hub;
- strategic investments in key development sites and associated public realm;
- adequate provision for parking at the centre perimeter; and
- redirection of through traffic away from the Kingsway retail & entertainment spine.

Council submits that two key, transport related infrastructure elements - which are essential requirements to support the sustainable development of the Glen Waverley urban hub – are missing from the Project proposal:

- a user-friendly and integrated transport hub; and
- construction of the Myrtle Street/Euneva Avenue ring road, or at the very least ensuring that this can be achieved by way of the existing Glen Waverley Metro line and station being lowered and undergrounded respectively, which is discussed elsewhere in this submission.

An integrated transport hub will:

- future-proof the urban form of the station precinct;
- provide a user-friendly public transport experience;
- unlock VicTrack owned land for mixed use development; and
- facilitate a future underground rail extension of the Glen Waverley line to the East.

The Myrtle Street/Euneva Avenue ring road is required to:

- direct through traffic away from the Kingsway retail & entertainment core;
- support the development of Kingsway as the central pedestrian spine;
- direct visitors to the perimeter carparks (at Bogong Avenue, Montclair Avenue, Railway Parade North & Euneva Avenue); and
- provide a through route for buses linked to the (Railway Parade North) integrated transport hub.

In summary, the proposed SRL project scope at Glen Waverley falls short of its own (SRL) program objectives and is inconsistent with the adopted, Structure Plan for the centre.

Critical aspects of the GWAC Structure Plan are not being addressed.

In relation to the station precinct and its associated *VicTrack* owned development sites, unanswered questions include:

- How will these sites be integrated with the existing urban form and character?
- How will the precinct be designed to maximise sustainability benefits?
- How will the precinct encourage a diversity of business types and promote a 24/7 economy?
- How will the design of these sites activate the adjacent street frontages?
- How will 'wind tunnel' effects (at street and podium levels) be avoided?
- How will these sites address public safety and CPTED?
- How will the precinct be designed to enhance the pedestrian network?
- What will be the new street hierarchy?
- Where will public spaces be located and what will be their purpose?
- How will undue overshadowing of key public spaces be avoided?
- Where is the provision for affordable housing?
- Where will key services be located? e.g. preschools, medical services, childcare facilities

Council submits that the SRLA cannot rely on the Scoping Requirements or the broad Public Works Declaration to artificially constrain what the Project comprises as the drafting of the Public Works Order and the Scoping Requirements which responds to the Public Works Order very clearly leaves the detail beyond the mere provision of tunnels and stations to the EES process to determine. Even so, the Public Works order states as relevant to Glen Waverley:

- six **new stations constructed** at Cheltenham, Clayton, Monash, **Glen Waverley**, Burwood and Box Hill proposed to be located generally in the areas identified in Figure 1, **with**

**interchanges to existing railway stations** at Cheltenham, Clayton, **Glen Waverley** and Box Hill;

In the EES, there is no interchange provided at Glen Waverley. Instead, in a manner which is not consistent with the Public Works Order, the EES states:

Key features of the SRL station at Glen Waverley are:

- A two-level underground station with a single gate-line at the concourse level;
- Two platforms with escalators and lifts connecting to the concourse;
- A single station entry facing Coleman Parade, including escalators and lifts connecting the concourse and ground level; and
- Final station design would be in accordance with architectural and urban design outcomes for Glen Waverley which would consider feedback from community and stakeholders.

Additional works for the SRL station at Glen Waverley would provide:

- A new station plaza opposite Coleman Parade, including laneways and paved surfaces around station entrance and storage for 600 bicycles; and
- **Upgrades to the existing Glen Waverley railway station forecourt to cater for the surface connection between the two stations.**

The Urban Design Strategy contains the following Vision for Glen Waverley:

### **Glen Waverley**

Glen Waverley will be a centre for workers, students and residents, accessible from across the eastern metropolitan region and anchored by a vibrant multicultural core. Central Glen Waverley will grow through an intensified mix of businesses, retail, services and entertainment uses, within a pedestrian- and cycling-friendly local environment.

and identifies accessibility and a centre for the eastern metropolitan region as key considerations. For instance:

Glen Waverley will be a centre for workers, students and residents, accessible from across the eastern metropolitan region and anchored by a vibrant multicultural core. Central Glen Waverley will grow through an intensified mix of businesses, retail, services and entertainment uses, within a pedestrian-and cycling-friendly local environment.

### Future state

Drawing upon elements that have made Glen Waverley such a vibrant place, the SRL station at Glen Waverley will build on the qualities of Kingsway, extending the existing centre westward and revitalising what is largely inactive public realm currently dominated by carparking.

The SRL station environs will contribute to creating an active, engaging and walkable centre that supports day and night-time activities, with improved connections between the existing transport interchange and the surrounding walking and cycling infrastructure. Enhanced and new streets and laneways will reflect desire lines linking to the SRL station entrance, the existing Glen Waverley railway station and bus interchange. The new movement network and block structure will connect logically into the broader precinct and contribute to the commercial and retail activation of Kingsway.

Co-located with the existing Glen Waverley railway station and bus interchange, the SRL station will generate greater volumes of foot traffic on the already busy thoroughfare of Coleman Parade. The design of Coleman Parade will improve safety and amenity for pedestrians and cyclists, improve the commuter interchange experience and become a high-quality pedestrian-oriented connector and arrival space for the precinct.

Framed by Myrtle Street and Bogong Avenue, which will be enhanced with improved cycling infrastructure, the SRL station environs will be defined by vibrant and bustling streets and spaces and a leafy treed environment. New public open space around the SRL station will provide places of respite through much-needed green spaces that will be easy to access for pedestrians and cyclists, creating an accessible and welcoming environment for the existing community, as well as the growing numbers of residents, workers and visitors.

Already a Major Activity Centre experiencing steady growth, Glen Waverley's population and its employment will double by 2056 compared with today. All household types will increase, with a particular increase in its aged population.

In the context of Glen Waverley being a significant destination (signified by its Metropolitan Activity Centre Status and its key modal interchange between trains and buses), the EES has failed to grasp the opportunity that is available for Glen Waverley as a result of this city shaping project.

The extent of the Project that is proposed by the Reference Design is inconsistent with key Urban Design Principles set out in the UDS namely:

#### Objective UD1.1 Legacy

Create a design that is enduring and functional for generations to come, is easy to maintain and manage, is adaptable to changing uses with minimal reconstruction, and will age gracefully in concept and detail.

#### Objective UD2.3 Integration with context

Ensure new works accommodate travel routes and activities that connect to, integrate with and complement those in the wider precinct.

#### 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.

The UDS "interprets" the notion of an interchange as follows:

- 5.1.4. New and existing stations and interchanges are well-integrated through the following (in order of priority):
  - a. Proximity
  - b. Physical connectivity
  - c. Visual connectivity.
  
- 5.1.8. The location, layout and footprint of interchange facilities minimise impacts on public realm quality, pedestrian connectivity, safety, experience and nearby land uses.

It is submitted that the EES should rethink the various initiatives proposed at Glen Waverley to fully realise the plans for Glen Waverley so that going forward, the precinct planning has proper foundations upon which to build.

Council submits that the lowering of Glen Waverley Metro Station and a proper connection between the two stations needs to be facilitated by the EES or planned for to create the sort of conditions that is required to enable Glen Waverley Activity Centre to achieve its full potential.

This is a substantial land issue that will influence how Glen Waverley develops and how the precinct planning at the next step will be undertaken.

Council refers to the attached (Appendix 1) *Glen Waverley Station 'Go Below'* plan which should form the basis of a revised surface plan that is incorporated into the EES and the Urban Design Strategy.

Council also refers to the attached Infrastructure Plan (Appendix 2 - *Glen Waverley Station Precinct Infrastructure Upgrade Requirements*) which identifies the infrastructure improvements required to the Glen Waverley Activity Centre consequent upon the Project.



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## 9. BUSINESS AND RETAIL

### Council's concerns

Council is very concerned at the impacts upon businesses particularly within the Kingsway precinct of the Glen Waverley Activity Centre. This has not been properly considered by the EES.

The SRL stations at Clayton and Glen Waverley are proposed to be located within designated activity centres. Importantly, as set out above, the Clayton Major Activity Centre forms part of the Monash NEIC and the Glen Waverley Major Activity Centre includes The Glen Shopping Centre.

Council considers the key impacts on business and retail during construction of the Project will include:

- Displacement of businesses (and employment) in the localities for the SRL stations and the Emergency Support Facility; and
- Reduced trading conditions for many businesses due to disruptions caused by construction works and loss of car parking particularly at the Glen Waverley centre.

### Glen Waverley

The *Business and Retail Impact Assessment* report states (on page 3) "in most localities and most regards, the expected negative impacts on business and/or retail during construction works are estimated to be negligible to moderate". It is considered that this statement is heavily reliant on how the construction activities are managed/mitigated, particularly in relation to air quality, noise, construction vehicle and rail replacement bus routing. These potential issues are discussed in more detail in other sections of the submission but all could potentially have a detrimental impact on business and retail sectors within the City of Monash.

The Glen Waverley Activity Centre but more specifically the traders in Kingsway are likely to bear the brunt of the negative economic impact from the construction. Disappointingly, the EES fails to recognise the direct and potential indirect impacts from the loss of car parking and the construction and haulage disruption in Kingsway and the associated reduction in foot traffic on trading conditions in the centre.

Rather, the only direct impact noted by the Business and Retail Impact Assessment is on the loss of the employment from the proposed acquisition of the RSL. This is an inadequate assessment of the overall potential economic impact likely to be caused to businesses on Kingsway during construction.

The lack of provision for the approximately 300 replacement and additional planned car parking spaces (on top of the 370 car parking spaces Council proposes to provide at significant additional cost at the existing Bogong Avenue multi storey carpark) leaves a significant shortfall that needs to be accommodated. In particular, the removal of approximately 300 conveniently located high turnover car parking spaces on Glendale Street and the Montclair Avenue off-street car parks will affect all businesses in Kingsway due to the likely impact on the overall customer numbers attending the Kingsway Precinct. The effect of this significant interruption on businesses is not discussed at all in the EES.

The impact from noise, vibration and dust during construction which will negatively impact the amenity of Kingsway and consequently discourage customers from attending the street, directly impacting businesses. Again, this does not appear to have been discussed or factored in the overall impact assessment.

Further, the proposed haulage routes along Coleman Parade, Montclair Avenue and Kingsway will create significant negative amenity and traffic disruption in Kingsway - further reducing the amenity

and attractiveness of Kingsway. This also does not appear to have been discussed or factored in the overall impact assessment in the EES.

All the above issues are likely to result in job losses and potentially business closures in the Kingsway Precinct due to construction related activity, with potentially severe impacts on the Glen Waverley Activity Centre. Council considers it unacceptable that this is not discussed or acknowledged in the EES. Further, whilst the forecast numbers for entries and exits are quite high (at 2.4 million per annum, which is around 4,700 per day (taking into account weekends)) compared to current figures, no evidence has been presented that train transfers generate significant local economic activity, particularly from commuters interchanging between the SRL and Metro line. No evidence has been provided that demonstrates that the Project will have any real economic benefit to the Kingsway retail area or the broader Glen Waverley Activity Centre.

### **Clayton**

The construction works in Clayton are less likely to have the same detrimental impacts on the Clayton Activity Centre because it is separated from the main retail and business area and has direct access to Clayton Road. However, Council submits that the potential redistribution of traffic due to the closure of Carinish Road needs to be assessed in greater detail, including the impact of this within the precinct.

### **Recommendations**

Council seeks:

- The EES should include further analysis and assessment of the likely business impacts as a result of the construction of the Project by the loss of carparking, the routes for heavy haulage vehicles and the associated loss of amenity at the Glen Waverley Activity Centre particularly in the Kingsway precinct. The recommendations of that further assessment should then be translated into specific requirements in modified EPRs B3 and B5).
- The EES should provide further consideration of the impacts on businesses within the Clayton Major Activity Centre as a result of the closure of Carinish Road.

## 10. TRAFFIC AND TRANSPORT

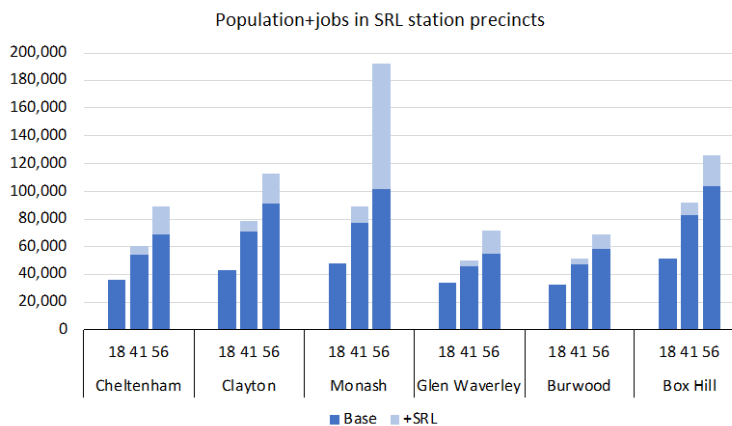
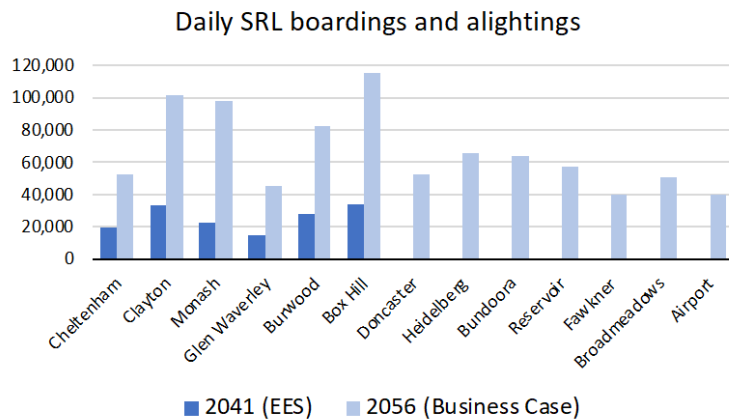
### Council's concerns

Council raised a number of issues on the traffic and transport aspects of the Project through the Technical Reference Group (TRG). Disappointingly, a review of Technical Appendix R.2: Traffic and Transport Impact Assessment (T&TIA) indicates that many of the issues raised by Council on earlier drafts during the TRG process have not been addressed.

Section 4.2.3 of the T&TIA states:

“A 2041 design year also allowed for an assessment that demonstrated a level of network redundancy and resilience – independent of any interventions which could be introduced to complement and support land use uplift aspirations for each of the SRL station areas.”

It appears that 2041 has been chosen for EES purposes because it shows that the network will have 'redundancy and resilience' at that time. However, the cumulative effects of land use change and SRL North development are substantial beyond 2041 (see graphs below, prepared from data in the EES and Business Case). Evidence is needed that the SRL East station precinct provisions will accommodate this level of activity growth. The cumulative impact section of the EES TT 1.4) states that this is the case, but does not provide any evidence.



### Station precinct layouts

The station precinct layouts do not depict station facilities in detail. Station building footprints are shown and conceptual plans are provided that have no status. No details of entry/exit layouts, supporting land use or designs are provided. Proposed bicycle parking facilities are not shown (these

will be sizeable and will need room for expansion and more importantly, neither do the EPR's make any reference to them). 'Future development sites' are shown within the immediate station area works, but no detail is given to illustrate how much development they will accommodate, or how they will be accessed from adjacent streets and paths.

As noted above, it is unacceptable that the EES has not engaged with the longstanding planning in the area which has anticipated the future lowering of Glen Waverley station. The future lowering of Glen Waverley station below ground is necessary to enable better movement and circulation, activation of land over the station, and pedestrianisation of the centre of the precinct (centred on Kingsway). Failing to consider the lowering of Glen Waverley station at the same time as the Project creates uncertainty and jeopardises the future direct passenger transfer connection between the SRL station and Metro stations below ground.

Also in relation to the proposed Glen Waverley SRL station, Council is concerned with the effect of traffic generating activities proposed on Montclair Avenue. Specifically, this relates to the proposed pick up and drop off parking spaces on Montclair Avenue and the impact that the traffic these generate will have on the pedestrian focussed Montclair Avenue and Kingsway. Council considers that other locations should be considered for these short stay parking spaces such as Coleman Parade and/or Bogong Avenue.

Regarding Clayton Station, the EES states that the road network will function satisfactorily with the closure of the central part of Carinish Road. While Council acknowledges the benefits of this from a public realm perspective at the proposed station, Council has concerns about the potential redistribution of traffic and impacts on the outcomes of the Clayton Activity Centre Precinct Plan 2020.

#### *Infrastructure Upgrade Requirements*

Irrespective of which site planning scenarios are adopted, upgrades to key adjacent streets and associated civic infrastructure will be necessary in response to the projected increase in travel across all transport modes. Please refer to the following documents where requirements are outlined:

- *Glen Waverley Station Precinct Infrastructure Upgrade Requirements* (Appendix 2); and
- *Clayton Station Precinct Infrastructure Upgrade Requirements* (Appendix 3).

The effects of the Project and associated development at Monash NEIC will see a significant growth in employment from 2041 – 2056. Significant active transport investment is required in the Monash Station precinct to facilitate this whilst safeguarding its place function. Maximising interchange with the proposed Monash SRL station and other public transport modes, including buses and a potential trackless tram proposal from Caulfield to Rowville, should be a key consideration in the EES.

#### *Traffic and transport modelling approach*

The overall modelling approach uses a hierarchy of transport and traffic models. The detailed precinct traffic impact assessments, both during construction and operation, are derived from strategic modelling using the Victorian Integrated Transport Model (**VITM**) and a new land use/transport interaction model (**CityPlan**). Council notes that peer reviews of these models have not been provided and there is no evidence that they have been properly calibrated and validated for use in the Project area of influence.

Council is also concerned that, although the traffic modelling allows for significant future population and employment growth in the station precincts (including that induced by Project itself), it is not evident that the actual physical location of redevelopment to accommodate this growth has been accounted for. This could have significant effects on the predicted distribution of people and vehicle movements in the station precincts, and the consequent performance of the local area transport networks.

#### *Construction impacts*

Council notes that various disruptions, road closures, heavy vehicle routes and site access arrangements are discussed and analysed for the construction phase. However, these are based on preliminary details only at this stage and could be strongly influenced by changes to project design and construction methods after the EES. Council has concerns over the construction impacts at Clayton, Monash and Glen Waverley SRL station precincts. In particular, at Glen Waverley, the proposed routing of construction traffic and rail replacement buses along Montclair Avenue and Kingsway will have a significant impact on the central retail and entertainment spine. Construction traffic and rail replacement buses should be routed *around* the activity centre, utilising Coleman Parade, Bogong Avenue and Springvale Road.

The EPRs need to provide a far more explicit and tighter regime to ensure that truck routes and Construction Environmental Management Plan's (CEMP's) for each of the SRL Stations are prepared and finalised in direct consultation with Monash City Council and also Monash University for Monash SRL station, given its significant interest in the area. Currently, the EMF proposes that the contractor would develop and implement the CEMP but Table EM5.1 makes no mention of either council's role or the university's role in the preparation or review or approval of such plan. This is unacceptable.

### *Operations impacts*

Council considers there to be significant shortcomings in the impact assessment of SRL patronage, access and egress movements by different modes and how they will be provided for, not only in the assessment year of 2041, but also in anticipation of the very large cumulative impacts from increased patronage as well as redevelopment in the SRL station precincts. Council is concerned that:

- Pedestrian level of service analyses have been provided for Monash and Glen Waverley, but not for Clayton.
- Significant car access demand is projected, but there is no station parking provided at any of the stations. At Glen Waverley the T&TIA states that *'with respect to the existing railway station affected parking and pick-up and drop-off bays on Coleman Parade during Early Works and Main Works, SRLA is working with the Department of Transport, MTM and the City of Monash on alternative temporary and permanent arrangements'*. Without resolving these issues at the outset, the traffic and transport impact of the Projects works in Glen Waverley cannot be fully assessed. Without station parking, there will be increased pick-up and drop-off demand, and at Clayton and Glen Waverley SRL users may choose to use existing Metro station parking. Council is not confident that the Project will accommodate this demand.
- The EES does not address the requirement for the replacement of public car parking spaces within the south west area of the GWAC. As set out above, Council had proposed the Montclair Multi-Deck car park project which was due to be located at 31-39 Montclair Avenue and consisted of providing 706 car parking spaces. As this car park is no longer proposed to proceed given SRLA's plans to acquire the site, SRLA must resolve the replacement of 300 at-grade local car parking spaces and an overall replacement of 706 car spaces for the GWAC before the Project proceeds. Since the announcement that the SRLA will potentially acquire both Council's at-grade car parks at 31-39 Montclair Avenue & 41-47 Montclair Avenue, Council has continued to work with the SRLA as it is considered that it is the joint responsibility (of Council and the SRLA) to find alternative locations for the replacement and additional car spaces that were planned to be provided at the above-mentioned site. With regard to the provision of car parking, Council's resolution from its October 2021 meeting: *"that Council's existing multi-level car park at 1-5 Bogong Avenue, Glen Waverley is the preferred location for the provision of some of the additional car spaces required to be provided noting as has been previously resolved by Council that the balance of the required car spaces is to be resolved with the SRLA as it is considered that there is a shared responsibility to accommodate those required car spaces"* remains unchanged. The expectation in these circumstances is that the SRLA will accommodate the provision of these spaces.
- Significant SRL patronage comes from adjacent Metro stations (rail transfer). Evidence is needed that the infrastructure can accommodate expected volumes of people walking

between Metro and SRL stations, with provision for demand growth well beyond 2056 for future-proofing purposes. Council is also concerned that, despite earlier promises, and notwithstanding that the Public Works Order Declaration calls for an interchange between the SRL Station and the Glen Waverley Railway station, there is no interchange proposed between Glen Waverley Metro and the Project station.

- The T&TIA states that bicycle parking will be provided to support a 15% bicycle access mode share. 2,960 bicycle parking spaces are proposed at the Project stations in total on day one (reduced from 3,450 in earlier drafts of the T&TIA). Council is concerned that this is insufficient for a 15% bike access mode share, even in 2041, let alone in later years. Clear provision needs to be made for bicycle parking, and more extensive infrastructure works to encourage and allow for more cycling to and from the stations, with room for future expansion, to limit additional car trips and parking demand.
- Bus access demand is also significant, but other than localised re-routeing of buses to provide access to SRL stations, Council is concerned that there are no proposals to change routes or service levels to demonstrably achieve the access shares quoted. Furthermore:
  - At Clayton, new bus stops are shown but no changes to bus services are proposed. The document states that 'future planning to upgrade frequency and service coverage is carried out by Department of Transport (DoT) as part of ongoing bus network planning'.
  - At Monash, a significant bus interchange is proposed at the SRL station, but no bus route changes are incorporated in the project. The document only says that 'some buses would require significant re-routing from existing routes to service the new interchange'.
  - At Glen Waverley, the document states that discussions are occurring with DoT to review bus routes, but no indication is given of the likely scope of any changes and how they will be accommodated.

## Recommendations

The EES should be modified to:

- Provide for or at the very least be designed in a way to not preclude the future lowering of the existing Glen Waverley Station;
- to provide an interchange between the Glen Waverley SRL Station and the Glen Waverley Metro Station;
- provide for the replacement of 300 at-grade local car parking spaces and an overall replacement of 706 car spaces for the Glen Waverley Activity Centre.

Further, Council considers that the information and analysis currently provided through the EES in relation to traffic and transport impacts is insufficient and does not demonstrate that the Project will achieve the level of activity in the precincts, or that the Project will achieve its stated aims and objectives. The EES should be amended to provide:

- Evidence that the Project precincts will accommodate the level of growth projected in those precincts;
- More detailed station building footprints, including entry / exit layouts, bicycle parking facilities, supporting land uses and designs;
- Evidence (including peer reviews) that demonstrate that the VITM and CityPlan models have been properly calibrated;

- Evidence that the physical location of redevelopment in the station precincts has properly been accounted for in the traffic modelling undertaken; and
- Evidence that the construction and operational impacts of the Project have been properly assessed, having regard to the issues raised above.

Council also considers the EPRs covering traffic and transport are too generalised, with no specific requirements relating to individual station precincts. Council seeks:

- EPRs T3-5 and T6-8 to be implemented in an integrated way instead of treating each mode of transport separately.
- The EPRs to be extended to cover monitoring of the Project's effects on travel and transport more generally, particularly whether the Project is achieving its stated aims in terms of patronage, access and egress mode shares, and road traffic relief, with provision for corrective actions to be taken if it is not. Currently, the focus of the EPRs during operations is limited mainly on safety and (for public transport) operational efficiency.
- Further, the EMF, in so far as it deals with Construction Environmental Management Plans, needs to be revised to ensure that Council has a central role in relation to the preparation and finalisation of those plans.

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## 11. ARBORICULTURE AND ECOLOGY

### Council's concerns

A significant amount of trees and canopy cover is to be lost through the development of the three station sites within the City of Monash, comprising an estimated total loss of 486 trees, equating to 20,569 m<sup>2</sup> of canopy (excluding further losses that may be associated with the Initial Works). This includes 49 trees of designated 'high' value, 198 trees rated as 'moderate' value, and two large scattered native trees (a River Red Gum and Manna Gum containing a hollow) at the Monash site. To compensate for this loss, EPR AR3 requires replacement tree canopy to double that which was removed by 2050.

While Council commends the proposal to ultimately increase tree canopy cover, the reliance upon the 2050 target is unacceptable as the ultimate measure. The Project will result in a 'canopy gap' for many decades to come due to the long period of construction and the decades between tree loss and maturation of replacement trees. This issue is magnified in Clayton and Glen Waverley, where there is relatively low existing canopy cover and the previous loss of trees on private property due to densification.

Council considers this 'canopy gap':

- to be contrary to various policies with the Monash Planning Scheme, including the Municipal Strategic Statement, which seeks to protect and enhance the 'Garden City Character';
- will result in an increase to urban heat retention, daytime temperatures and discomfort for the community on extreme heat days due to loss of shade and evapotranspiration-driven cooling, which is not adequately addressed in the EES;
- has not been shown to be adequately mitigated and managed through the EES documents.

Further, Council considers the Project to address tree and canopy loss 'from the wrong end'. There has been insufficient effort at the outset to avoid loss of trees and canopy loss. Given the critical nature of green assets to Monash, Council contends that significant efforts should be made by the SRLA to avoid loss of these assets from the start of the Project, rather than focusing on making up for the loss in 30 years time.

Further, in relation to the impact of the Project on biodiversity, Council is concerned:

- that insufficient detail has been provided in the Ecology Impact Assessment to assess the cumulative impact of the loss of trees and other existing conditions on the three threatened fauna species identified in the City of Monash (Powerful Owl, Swift Parrot and White-throated Needletail);
- that the threat posed by stormwater runoff and pollutants, transported via the stormwater drainage system, is not adequately assessed in the Ecology Impact Assessment, particularly the potential impact of the endangered Foothill Burrowing Crayfish at Valley Reserve and the critically endangered Murray River Turtle in Scotchmans Creek;
- about the impacts of vegetation loss on ecological corridors and habitat connectivity given that EPR AR3 primarily focuses upon tree replacement but a diversity of understorey and mid-storey species are required for a functioning ecosystem.
- about the impact of lighting from the stations on native fauna, particularly fauna at Jock Marshall Reserve near Monash station and Bogong Reserve near Glen Waverley Station.



Council is also concerned about the loss of public open space, tree removal and changes to the historical heritage and amenity of the Clayton Remembrance Gardens as a result of the Project.

## Recommendations

Council seeks:

- For the Project to be modified such that it reduces the amount of established trees and canopy cover which will be lost within the City of Monash through the construction of the Project;
  - EPR EC1 and AR1 to be amended to require significant efforts to avoid the loss of established green assets and further detail about how these significant impacts can be adequately mitigated.
  - EPR AR3 be amended to require the Tree Canopy Replacement Plan include:
    - Replanting targets in the near-term (e.g. within 5 years of tree loss, as opposed to the 2050 target);
    - Details on where and how a healthy, mature canopy will be established, including how adequate water sources will be provided in the face of climate change, increased imperviousness and competition for space above and below ground;
    - Details regarding the tree establishment protocols;
    - Details regarding how Water Sensitive Urban Design will be used as standard practice to divert rainwater or stormwater to support tree growth;
    - Detailed plans to address the increased Urban Heat Island impacts around the three station sites as a result of the significant canopy loss;
    - A stronger focus on biodiversity, including detailing how the impacts to biodiversity, ecological values and habitat corridors will be mitigated through the Tree Canopy Replacement Plan, including more detail on the proposed understorey plantings and connectivity of vegetation;
    - The degree of compatibility with Council's relevant strategies and policies;
    - Investigations into alternative infrastructure options to mitigate the loss of trees, biodiversity and open space; and
    - Green infrastructure in the form of green facades, walls and roofs in areas where space is constrained.
  - Integration between the Tree Canopy Replacement Plan (EPR AR3) and Integrated Water Management Strategy (EPR SW9).
  - EPR EC4 to be amended to require the Project to minimise lighting impacts for native fauna, particularly fauna at Jock Marshall Reserve near Monash station and Bogong Reserve near Glen Waverley Station.
- EPR EC5 and SW8 to provide for Gardiners Creek naturalisation to the reach between Warrigal Road and Highbury Road.

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## 12. GREENHOUSE GASES

### Council's concerns

Currently, much of the detail about how the Project will achieve net zero and minimise emissions is yet to be determined as part of setting greenhouse gas emissions targets (EPR SGG1), a Feasibility Market Analysis and development of a Sustainability Management Plan (EPR SGG2).

Council seeks to remain informed as these plans and targets are developed and advocates for approaches consistent with Council's *Net Zero Carbon Action Plan 2020-2025*. Actions include sourcing 100% renewable electricity, enhancing energy efficiency, installing roof top solar where investment opportunities are greatest, transitioning to electric vehicles, adopting sustainable procurement practices and Environmentally Sustainable Design for buildings and infrastructure. Where greenhouse gases cannot be avoided Council will achieve carbon neutrality through offsets. Monash has also committed to reduce waste generation and divert from landfill, and promote an Urban Carbon Forest. This is relevant to the Tree Protection (EPR AR1) and Replacement Plans (EPR AR3) for the project.

In particular, the SRL project is exploring a 35% reduction of Portland cement, the use of passive design, and plans to reach an aspirational net-zero emission target. Council considers that the use of biogas or hydrogen, recycled-content or low emissions construction materials should be explored. Further, more effort should be made by SRLA for the minimisation of tree loss (and thereby stored carbon).

### Recommendations

Council seeks:

- EPR SGG1 to be amended to:
  - Require sustainability targets and performance indicators to be developed as early as possible in the Project and for Council to be consulted on the meeting of sustainability targets and performance indicators.
  - Require sustainability targets and performance indicators to:
    - Consider greenhouse gas emission from trees (removed and planted), waste, building materials and waste soils should also be included.
    - Require the mitigation of the urban heat island effect, which will be exacerbated by tree removal and climate change.
    - Be integrated with EPR SW9 (Develop and implement an Integrated Water Management Strategy) and AR3 (Develop and Implement a Tree Canopy Replacement Plan).
    - Provide standards and measures to ensure the infrastructure constructed for the Project is resilient to a changing climate and helps to enhance the community's resilience to climate extremes.
  
- EPR SGG10 to be amended to:
  - Provide specific standards and requirements to ensure that the Project demonstrates that it has been designed to lead the industry in delivering a circular economy project.

- Require SRLA to investigate the potential to use lower carbon materials as early as possible in the Project to allow integration of circular economy principles into the early stages of design.
- Require SRLA to seek opportunities to use recycled materials and repurpose waste streams (landfill diversion).
- Require principles relating to the circular economy to be embedded into the procurement practices throughout all stages of design, construction and operation.

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## 13. SURFACE WATER AND GROUNDWATER

### Council's concerns

Council considers that, given the size and city shaping nature of the Project, the very highest standard and leadership in innovation in Water Sensitive Urban Design (**WSUD**) and Integrated Water Management (**IWM**) is warranted. These solutions are central to achieving many of the Project objectives and should be embedded across all aspects of design at the early stage to address water retention, urban cooling, greening and amenity objectives, as well as minor flood management.

The EES does not properly explain the Water Sensitive Urban Design (**WSUD**) measures proposed by the Project. The WSUD response in the Surface Water Impact Assessment is primarily limited to rainwater tanks to mitigate the impact of excess stormwater runoff from the Station boxes. The rest of the WSUD design response remains unknown because the management of runoff from the broader precincts was not within the scope. The limited WSUD solutions which are proposed are not consistent with the best practice approach suite outlined in *EPA Publication 1739.1 Urban Stormwater management guidance (2021)*, nor Council's own policies relating to IWM (*Environmental Sustainability Strategy 2016/2026 and Water Saving Feasibility Study 2019*).

Council notes that the UDS acknowledges the broad range of benefits from WSUD and IWM but the detail of how this will be applied is unknown. Furthermore, while the EPRs call for an Integrated Water Management Strategy to be developed and explored with stakeholder consultation, no detail has yet been provided. Council is concerned that without this detail, the IWM may not be developed in time to influence design at the early stage required to embed WSUD and IWM opportunities throughout the Project.

Dewatering for construction will result in groundwater drawdowns for 2-5 years during construction, with recovery across a similar period post-construction. While no groundwater-dependent ecosystems are expected to be impacted, Council is concerned there may be impacts to baseflow in Damper Creek and the drawdown will compound the impact of impervious surfaces which greatly reduce rainwater infiltration, groundwater recharge and stream baseflow contributions in urban environments.

Further the solutions presented to date do not place a strong enough emphasis on infiltration-based solutions, yet this will provide a water source to garden beds and re-established trees, enhance landscape cooling, reduce potable water use and contribute towards groundwater recharge and baseflow restoration. It is recognised that localised infiltration will not compensate for the groundwater drawdown, but the Project can set an example for the catchment by promoting the infiltration of excess stormwater runoff. This is a priority within Melbourne Water's *Healthy Waterways Strategy, EPA Publication 1739.1* and consistent with Targets in the Catchment IWM Plans. Hence, in addition to water attenuation, treatment and reuse, the infiltration of runoff should be strongly promoted in design solutions for the station precincts.

Additionally, Council considers more information is necessary to understand how stormwater runoff and sediment from the broad precinct (beyond the station boxes) will be managed, particularly considering the protracted period of construction and that sites may be vacant for long periods.

Finally, Council advocates for the naturalisation of Gardiners Creek between Warrigal and Highbury Roads, as an extension of the naturalisation of the creek planned alongside Burwood Station.

### Recommendations

Council seeks:

- IWM and WSUD to be embedded into the early stages of project design to ensure the best outcomes for the Project, community and the environment.

- EPR SW1 to be amended to provide further detailed requirements as to how EPA Victoria Publications 275 Construction techniques for sediment pollution controls and 1834 Civil construction, building and demolition guide will be applied to manage sediment and runoff from sites, including:
  - Which controls will be implemented and how will they be monitored for their effectiveness?
  - How will the sites be managed across the whole precinct for the extended timeframes of construction and long-term development?
  - How will long-term dormant sites be managed, such as sites vacant until Rail Day 2?
- EPRs SW1, SW3, SW5 and SW9 to be amended to ensure integration with the Monash Planning Scheme and to ensure IWM is considered in stormwater management plans throughout construction and operation.
- EPR SW5 to be amended to:
  - Address how stormwater runoff from the broad precinct will be managed, including station approaches, carparks, access roads and other hard surfaces;
  - Be integrated with EPR AR3 (Develop and implement a Tree Canopy Replacement Plan) to enable runoff to be used to support healthy tree growth and enhance urban cooling;
  - Be integrated with SW9 to make use of stormwater runoff for fit-for-purpose uses.
- EPR GW5 and SW7 to be amended to require SRLA to communicate with Council regarding any significant observations or detections of changed surface water or groundwater quality, or significant unexpected changes in surface water flows or groundwater drawdown, for waters within the City of Monash.
- EPR SW8 to be amended to include the naturalisation of Gardiners Creek between Warrigal and Highbury Roads, to connect to the naturalisation of the creek alongside the Burwood Station (EPR EC5).
- EPR SW9 to be amended to:
  - Require the Project to use innovative and best practice WSUD technologies and IWM approaches, consistent with EPA Publication 1739.1 and the EPA's General Environmental Duty.
  - Require the IWM Strategy to cover the entire precinct, not just the station boxes, and be continuously reviewed and updated a necessary.
  - Require the IWM Strategy to refer to the Victorian Government's IWM Catchment Plans and outline how the Project will contribute towards the Targets.
  - Be integrated with EPR AR3 and require the IWM Strategy to consider the mitigation of the urban heat island effect and added impacts from the loss trees and how WSUD can be incorporated to provide a water source for replanted vegetation.
  - Require the IWM Strategy to outline how WSUD and IWM will be integrated into design solutions for amenity, passive irrigation of garden beds and plantings, cooling of the pedestrian and vehicle approaches, carparks, places to rest, waiting areas, and the façade or roof of station buildings.

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## 14. AIRBORNE NOISE

### Council's concerns

The *Airborne Noise Impact Assessment* report was prepared in accordance with the scoping requirements for airborne noise. Airborne noise impacts were modelled for the Project's construction and operation. These impacts were assessed against relevant EPA and Victorian Government guidelines and policies.

Council considers the report is comprehensive, well-presented, and readable, making a review relatively straightforward to accomplish. However, it suffers from a lack of traceability, and appears inconsistent, making it difficult to accept and adopt the rather benign impacts that are suggested, which in-turn raises legitimate concerns that the actual construction impacts of the Project may be much greater than indicated.

Whilst the "worst case" scenarios were apparently modelled, Council considers that the Airborne Noise Impact Assessment provides insufficient justification why the scenarios modelled are considered "worst case". Furthermore, there are no tables or lists of equipment items included for each model scenario, nor details of the relevant sound power of items when adjusted for duration or character. Good practice requires traceability and clarity so that the underlying assumptions in such critical modelling can be checked and validated. The report provides no such opportunity for this review and would benefit from a more comprehensive description of each modelling scenario, the intended equipment, sound power levels with ratings and any duration or other (e.g. tonality, impulsiveness or intermittency) adjustments.

The proposed EPRs are intended to protect the community interests during major infrastructure construction works and satisfy the General Environmental Duty of the Environmental Protection Act 2017. However, it is worth noting that EPR NV4 requires the site Contractor to *develop and implement management actions for non-residential noise sensitive areas*, if construction noise is predicted or measured to exceed the internal and proposed internal and external noise levels (AS/NZS 2107:2016 and the NSW Interim Construction Noise Guideline 2009) and a noise sensitive receptor is expected to be adversely impacted. The EPRs do not appear to require the verification of the Independent Environmental Auditor (IEA) doesn't appear to be required. Clear justification and the verification of the IEA should be secured for any construction works above the AS/NZS 2107:2016 and the NSW Interim Construction Noise Guideline 2009 noise limits.

Overall, the opposing parameters of potentially overestimated SRLA Guideline benchmarks or EPA Guideline 1834 noise limits and the potential understatement or omission of modelled noise sources makes it impossible to verify the conclusions of the Impact report in its current form.

### Recommendations

Council seeks:

- Inconsistent noise data for modelled equipment to be resolved or clarified through the EES process to address the uncertainty, and confusion created by the lack of full details provided of the modelled scenario before the assessment of noise affected receivers can be considered.
- EPR NV4 to be amended to require:
  - Management actions for non-residential noise sensitive areas need to be prepared and implemented if construction noise is predicted or measured to exceed the internal and proposed internal and external noise levels (AS/NZS 2107:2016 and the NSW Interim Construction Noise Guideline 2009) and a noise sensitive receptor is expected to be adversely impacted.

- Clear justification and mitigation is to be provided for any construction works above the AS/NZS 2107:2016 and the NSW Interim Construction Noise Guideline 2009 noise limits and the verification of the IEA.

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## 15. VIBRATION AND GROUND-BORNE NOISE

### Council's concerns

Council is concerned about the vibration and ground-borne noise emissions generated by the Project, given the potential for these to have an impact on amenity and comfort, and the integrity of structures. It can also impact the functioning of sensitive equipment, such as that used in medical or research facilities. Construction equipment and the movement of passenger trains through railway tunnels can cause vibration and ground-borne noise.

The Vibration and Ground-borne Noise Impact Assessment identified a number of receivers in close proximity to the station sites. These include residential properties, sensitive equipment (e.g. CT scans), hospitalised patients, audiology facilities, particularly associated with hospitals surrounding Clayton station, heritage buildings, places of worship, student accommodation, Monash University, the Australian Synchrotron and CSIRO's acoustic laboratories near Monash station, and multi-storey apartment buildings near Glen Waverley station. Sensitive receivers identified along the tunnel alignment include residences, Leica Biosystems, a medical equipment manufacturer, Monash University, the Australian Synchrotron, CSIRO and heritage buildings. The Australian Synchrotron and vibration-sensitive CSIRO laboratories were noted as potentially the most sensitive receiver along the alignment corridor.

It is also noted that the Monash SRL station site will be used to launch two tunnel boring machine devices (to the north) and retrieve two tunnel boring machines (from the south).

It is envisaged that the main impact will be during the construction phase and associated with low frequency noise and vibration transmitted through the ground that could potentially be audible in bedroom or living room areas, especially in the evening and at night (outside of normal working hours (between 7am – 6pm Weekdays, and 7am – 1pm Saturdays)). The Impact Assessment expects that a number of residential properties within the City of Monash will be impacted at various times during construction, including from tunnel boring machines (approximately 30 residential properties) and cross passage construction (approximately 150 residential properties if works were undertaken at night).

The Vibration and Ground-borne Noise Impact Assessment suggests minimal impacts if construction activities are undertaken during normal working hours, which in-turn raises significant concerns that the actual construction impacts may be much greater than indicated.

Council is concerned about the impact to sensitive receivers within the City of Monash. Council seeks for the EPRS to provide for close stakeholder engagement, effective control measures, monitoring and adaptation of plans or works in response to significant exceedances of the thresholds set in the EPRs.

### Recommendations

Council seeks:

- EPR NV3 and EPR SC2 to be amended to provide for close alignment between the Construction noise and Vibration Management Plan (EPR NV3) and the Communications and Stakeholder Management Plan (CNVMP) (EPR SC2). Stakeholder engagement should occur throughout the development of the CNVMP and stakeholders should be informed of exceedances of the noise levels defined in EPRs NV4, NV5, NV6, NV7, NV8, NV9, NV10, NV11 and during the operational stage in NV13, NV14, NV15, NV16 and NV17.



- EPR NV3 to be amended to require the consideration of the amenity impacts to commercial and industrial businesses within proximity of the station sites and alignment, and incorporation of their interests into the CNVMP (EPR NV3).

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## 16. AIR QUALITY

### Council's concerns

The Air Quality Impact Assessment discusses existing conditions, potential impacts and example mitigation measures that have informed the EPRs that define the environmental outcomes the Project must achieve. Council notes that air quality has a relationship with the social, human health and business impacts of the project.

The Air Quality Impact Assessment notes that the likely effects on air quality from the Project were considered for the design, construction and operation phases of the Project. The focus of the assessment appears to be the generation of dust from the demolition, earthworks, excavation and spoil handling activities that would be undertaken at each site during construction and the potential for that dust to cause human health impacts. It finds that construction activities with the potential to generate nuisance dust will occur intermittently at different locations for varying durations within each construction site. Importantly, there may be occasional days where residents within 50-100 metres of the station construction sites experience dust settling on surfaces or visible dust plumes in the air.

Council considers the EPRs need strengthening to address the potential impacts that the construction will have on air quality, which in turn have social, human health and business impacts. The inclusion of specific measures and standards in the EPRs would enable these impacts to be better managed and mitigated.

### Recommendations

The EES should be modified, or further information provided, to:

- Address the potential for increased vehicle emissions during the operational phase due to the increase in vehicle (including bus) movements associated with the new stations.
- Address the impact of tree removal on air quality, including the role of vegetation in physically screening dust, enhancement of air quality via photosynthesis and the impact of the decades with significantly reduced mature canopy.

Further, Council seeks for EPR AQ1 to be amended to:

- Ensure the Environmental Air Pollution and Dust Management Plan (EPR AQ1) is able to detect and respond to a wide suite of air pollutions (rather than just dust, PM2.5 and PM10).
- Address potential dust impacts and mitigation measures for the period between demolition and work, particularly for sites left vacant for long periods (until Rail Day 2 in some cases) including the use of revegetation to control dust and sediment mobilisation.
- Provide for integration and consistency with SW1 and SW5.
- Address how controls at ground level would protect sensitive receptors at height in multi-storey buildings (such as the residential colleges at Monash, the Monash Children's Hospital near Clayton, or apartment residents around Glen Waverley).
- Address the lack of additional mitigation measures to protect these sensitive receptors near the Glen Waverley SRL station site that include hospitality venues (with outdoor dining) approximately 80 m east of the station box, as well as offices, retail/services and a carpark to the south, the existing station to the north, and residences situated approximately 70 m from the proposed stockpiles. This should include consideration of the impacts of wind tunnelling and variable gusts amongst the multi-storey buildings.

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## 17. PLANNING SCHEME AMENDMENT

The drafting of the planning scheme amendment documents is directly related to the question of whether the project is a reference design or a project design. The EES is predicated on the basis that the EES is based on a reference design and the drafting of the incorporated document and the EMF seems to proceed on that basis. Thus the provisions are very broad and allow the Minister to approve various documents which can be different to the form of the documents exhibited with the EES. This brings into question whether an EES will have been undertaken on the project that is built as distinct from the reference design.

Council reserves its right to expand on this issue after hearing how the Authority presents its case.

Council has considered the use of the proposed Specific Controls Overlay (**SCO**) and sets out specific comments in relation to the SCO14 and SCO15 below. Council reserves its rights to make further submissions on the use the SCO and proposed incorporated documents, and respond to issues raised by other submitters on these matters at the IAC hearing.

### SCO14

Council recognises that the State significance of the Project warrants the use of the SCO14 to streamline the approval process for the Project.

Council notes that the declared Project area follows a defined corridor unrelated to title boundaries and this is reflected in the planning scheme overlay maps. There is the risk of some uncertainty about whether works are located within the Project area or not. Consideration should be given to extending the overlay over title boundaries to avoid confusion.

We make the following further preliminary comments in relation to the Incorporated Document introduced by SCO14:

- Clause 4.4.5 should be amended to expressly require SRLA to engage with affected councils where the Minister for Planning exercises power to amend the EMF, any of the EPRs or key documents such as the UDS or any of the relevant plans, particularly the urban design and landscape plans.
- The Urban Design Advisory Panel (**UDAP**) proposed in clause 4.5 should specifically include a Council representative.
- The definition of 'preparatory buildings' in clause 4.10.2 is vague, and should be amended to provide for more certainty of the particular types of buildings that meet the definition. Currently, preparatory buildings and works are defined as "include, but are not limited to".
- Stronger provisions and criteria should be included for the process of amending key documents such as the EMF and UDS. These are intended to be foundational documents and should not be amended "to the satisfaction of the Minister"

### SCO15

Council acknowledges the constraints of the current overlay provisions available for this project. It is understood that the inclusion of a control to protect the tunnel asset in the future is reasonable and sensible.

However, Council is concerned about the 'hidden' nature of the planning permit triggers that necessarily occurs with the use of an SCO and Incorporated Document. It will not be possible for a landowner to find the permit requirements in the same way as the other parts of the planning scheme.

To improve the transparency of the planning system in relation to protection of the Project infrastructure, Council considers that the Minister should consider introducing a new Infrastructure Protection Overlay or amending the SCO to provide for the planning permit triggers within the overlay itself rather than being contained in a separate incorporated document.

Further, Council notes that the Project Infrastructure Protection Area A contained in the Infrastructure Incorporated Document provides a higher set of requirements for where a permit is sought. Whilst the Incorporated Document maps these areas in a non-cadastral way it is noted that the translation proposes to follow the title boundaries, and this is considered appropriate as it reduces any uncertainty about whether works fall within the relevant protection area.

Finally, it is essential that given planning permit applications may be called up by the proposed SCO15, given the referral requirements, SRLA should be properly resourced to ensure an ability to provide for timely responses to permit applications.

In relation to the Incorporated Document introduced by SCO15 we also submit that:

- The introduction of the SCO15 Incorporated Document has the potential to introduce additional and unnecessary work for local government through unnecessary planning permit triggers. The SCO proposes to trigger permits for development (including demolition) based upon a 'weight above surface level' criteria. While the permit trigger on demolition is acceptable, it is unreasonable for councils to have to manage the permit trigger for new development based on technical criteria.
- Rather than trigger planning permits and then having planning departments having to refer, write reports and determine an application, provisions should be introduced that require a development proposal to seek pre-approval from the SRLA prior to lodgement of a permit application, to enable an application to be assessed and determined quickly. This puts the onus back onto a developer to seek pre-approval of detailed designs, rather than Council. The consideration of a proposal by a council can then be limited to the usual planning considerations with the technical details left to the pre-approval process and conditions of a planning permit which would then require formal sign off by the SRLA before endorsement of plans under a planning permit.