

Car Parks for Commuters Project – Eltham and Wattle Glen

Submission from the Nillumbik Shire Council to the Level Crossing Removal Project (LXRP)

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Acknowledgement of Country

We acknowledge the Wurundjeri Woi-wurrung people as the Traditional Owners of the Country on which Nillumbik is located, we pay our respects to Elders past, present and future, and extend that respect to all First Nations People. We respect the enduring strength of the Wurundjeri Woi-wurrung and acknowledge that sovereignty was never ceded.

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Introduction

Council welcomes the opportunity to provide a submission on the State Government's Commuters for Car Parks Projects for Eltham and Wattle Glen. Providing additional commuter car parking at railway stations can be important to supporting sustainable transport, but should be done in a way which appropriately supports other community objectives. Examples of these other objectives are to protect the environment, support the local character, support surrounding community uses and to provide a safe environment for pedestrians, cyclists and motorists.

A key and central theme in Council's submission is that the proposals for Eltham and Wattle Glen of the Car Parks for Commuters Project unnecessarily and excessively conflict with a range of broader community objectives. In Eltham, Council anticipates there will be excessive and unwarranted tree loss and further, significant adverse impacts for surrounding community uses, especially for the Eltham Childcare Co-operative. In Wattle Glen, there will be an unacceptable impact on the visual amenity of a key entrance to the locality, unnecessary impacts on vegetation and further, a more dangerous situation will be created for pedestrians and traffic in vicinity of the proposed car parking. These are significant issues with each proposal and Council contends that they can only be addressed by a fundamental re-design of both proposals.

Council is of a view that both projects prioritise the provision of car parking as a single-issue project objective at the exclusion of place values and functions that are essential to the Nillumbik community.

The proposals appear contradictory to the integrated place outcomes intended in the Victorian State Government's own Urban Design Charter and Urban Design Guidelines for Victoria. Both proposals will negatively impact on their place-locations and restrict the ability to improve them in the future. As such, both projects inherently fail to address the sustainability imperatives that are incumbent upon all of society.

A further key issue raised in Council's submission is that LXRP's consultation material for the proposals is inadequate as it is silent on clear and significant impacts, such as tree removal and land acquisition. This inadequacy brings into the question the extent to which LXRP's consultation reasonably satisfies the requirements of Clause 52.03 of the planning scheme for consultation.

Eltham Railway Station

Council is greatly concerned with the proposal of the Car Parks for Commuters Project for Eltham, particularly in relation to the following matters:

Impacts on Vegetation

Contribution of Vegetation to the Railway Precinct and Surrounds

The Eltham railway station precinct contains significant stands of vegetation, on both the west and east sides of the railway line. On the west side, the precinct provides significant stands of vegetation along Youth Road and in the railway station car parks and other land that abuts Youth Road. On the east side, there is a spread of vegetation, including some large trees, between the station and Main Road.

This vegetation performs a range of important functions for the community. For example:

- Vegetation along Youth Road (including that within the car parks):
 - Contributes to the ecological corridor associated with the Diamond Creek, noting the creek bank is only metres from the south end of Youth Road.
 - Provides important screening of existing car parking within the west side of the station precinct and of other railway infrastructure in that area, such as the existing maintenance yard, stabling and shipping containers.
 - Contributes to a buffer between the hard surfaces and uses associated with the railway station precinct and community uses which are in very close proximity, such as the Girl Guides, Scouts, Eltham Tennis Club, Eltham Child Care Cooperative, Eltham Cricket and Football Club, Diamond Creek Trail and Andrew Park. This is not only a visual buffer, but the trees assist in reducing noise and light pollution from the railway yards.
- Vegetation between Main Road and the railway station breaks up the large expanse of building and asphalt in that area, which is associated with significant areas of at-grade car parking and the bus-interchange.
- When arriving at the Eltham railway station, vegetation on both sides of the railway line contributes to a sense of arriving at a distinctive bushland or semi-rural community, which is very much the preferred character for Eltham.

It is important to realise that even though the vegetation in the railway precinct varies in quality and origin, it all contributes to these positive outcomes for the community.

It is evident that the proposal of the Car Parks for Commuters Project for Eltham will remove significant vegetation. Council is very concerned at this anticipated removal, particularly the following:

Removal of vegetation for new car parking spaces off Youth Road

The construction of the new large additional car park at the south end of Youth Road will evidently require the removal of at least a significant amount of the vegetation in that part of the railway precinct. The area of vegetation which would appear to be impacted is indicated in the following aerial and photo.





This vegetation, whilst varying in quality, is important for many of the reasons stated above. It particularly plays an important role in screening the hard infrastructure and uses associated with railway for the sensitive surrounding land uses (tennis courts, public parks and the Diamond Creek Trail). It will be to the significant detriment of the railway station and broader Eltham Town Centre if this vegetation is removed.

In relation to this matter, a problem is not only the anticipated tree removal at the south end of Youth Road, but it also appears that the proposed large new commuter car park at that spot will have significant visual bulk. By way of explanation, the proposed extension of the car park in this area has to deal with a notable fall in the land to Youth Road. That fall is currently planted with much of the vegetation that will evidently be removed. To compensate for that fall and provide the additional space required for the new car parking, it is clear that retaining walls will be required. The height and length of these walls, plus the removal of the vegetation in that space, will likely have a significant visual impact on the streetscape.

Removal of two significant trees abutting the Eltham Childcare Co-operative

It is evident that the project proposes to remove two large trees in order to provide for vehicle movement from the relocated maintenance yard. This would be highly disappointing, as not only are the trees significant in size, but they also play an important role in buffering the Eltham Childcare Co-operative from the hard uses and development associated with the railway precinct (e.g. stabling, parking, train movements). The removal of these trees would be inappropriate.



Two large trees anticipated to be removed for the extended maintenance yard.

Removal of trees in existing car parking in Youth Road

From the consultation plans, it would appear that certain trees and other vegetation at the north end of Youth Road will be removed to create seven new car spaces. This would be unacceptable as the vegetation is an important buffer of the existing carpark from Youth Road and contributes to the established amenity of the area. The vegetation in question is shown in the photos below.



Removal of three large trees fronting Main Road

The proposed car parking works adjacent to Main Road would appear to require the removal of certain significant trees. The trees in question are indicated in the photo below. When travelling along Main Road in Eltham, it is evident that canopy trees are an important part of the streetscape, particularly as canopy trees are located within the median strip and within the frontage of properties to contribute to the preferred character of the Eltham Major Activity Centre. The trees indicated in the photo below contribute in such a manner to the streetscape.



The tree to the right is a particularly prominent tree in this central and high-use part of the town centre.

Lack of Regard for Avoid and Minimise Vegetation Removal

State Planning Policy sets a clear directive that impacts on native vegetation should be minimised by following a regime of avoid, minimise and (as a last resort) offset vegetation loss. Council does not believe this approach has been adequately used in relation to the Eltham proposal. By way of explanation, Council believes the vegetation impacts of the proposal could be significantly reduced by the project proposing to provide additional formalised parking along the east side of Youth Road. This section of Youth Road is devoid of vegetation and has a wide road shoulder which could easily be developed into a considerable number of additional formalised parks. This option is discussed further below.

Further Council contends that the significant trees adjacent to Main Road (e.g. the trees shown in the previous photo) could be retained if certain simple modifications were made to the design of the proposed changes in that area.

Lack of disclosure of tree removal in consultation plans

Council wishes to highlight an issue it has with the consultation plans for the Eltham project, which is the plans do not show tree removal that Council has noted is clearly required for the proposal. It is not appropriate that the plans do not show this tree removal, as this is a significant impact of the proposal and one that the community should be made aware of as part of the consultation. To not provide this information, brings into the question whether LXRP is satisfying the consultation requirement of Clause 52.03.

Further, the consultation plans should include perspective illustrations representing the proposal, so that the community and the Council can properly appreciate what is proposed. This would for example assist Council and the community to understand the combined visual impact of the proposed retaining walls and vegetation removal along Youth Road.

In addition, the consultation plans should detail the location of the proposed landscaping.

Impacts on Community Uses – Eltham Child co-operative

Proposed Acquisition of Land at 16 Panther Place for the Maintenance Yard

LXRP has advised Council that it proposes to acquire approximately 150 square metres of Council land at 16 Panther Place for use by the proposed maintenance yard.

(LXRP has noted to Council that the exact acquisition required actually needs to be confirmed by a proper survey assessment.)

The site 16 Panther Place provides a Council owned childcare facility, which is leased to the Eltham Childcare Co-operative (the co-operative). The co-operative is operated by a Parent Committee of Management and provides early year's education and care for children from birth to six years of age. It currently has an enrolment of 137 children and operates Monday to Friday.

Based on discussions and correspondence with LXRP and based on Council conducting a number of site visits, it is Council's understanding that:

- The land (approx. 150 square metres) is to be acquired pursuant to Section 134(1)(b) of the Major Transport Project Facilitation Act 2009.

- The space to be acquired is to provide an exit driveway for the new maintenance yard and sufficient storage space for three shipping containers.
- The shipping containers will be used to store “maintenance material”.
- The land to be acquired currently provides an informal open space buffer, containing two substantial trees, between the existing maintenance yard and the co-operative.
- The proposal will require two trees to be removed to allow re-development of the site for a maintenance yard and associated vehicle exit.
- The acquisition of land and redevelopment of the maintenance yard will result in a setback of approximately 2.5 metres between the maintenance yard and the main building of the co-operative and a similar setback to a section of the co-operative which is used as the facility’s vegetable garden.
- The proposed exit for the maintenance yard, using the land to be acquired, will be into a car park that Council has been proposing to construct next to the co-operative.

Council has the following significant concerns regarding acquisition of part of 16 Panther Place and with the proposed use and development of the land to be acquired:

- The proposed setback of the maintenance yard to the co-operative will be unacceptably reduced and unacceptably small, noting:
 - The reduced setback of 2.5 metres to the main co-operative building will likely have impacts on that building in terms of over-shadowing, noise and restricting movement around the building; and
 - The similar reduced setback to the vegetable garden will likely undermine the suitability of that site for growing vegetables due to noise and over-shadowing.
- The proximity of the rail storage will likely completely, or significantly, block the view from the co-operative to what is currently an open space buffer and further, will create a closed in feel which will not at all match the philosophy of the co-operative or the Eltham landscape. Council understands that this type of impact already occurred some years ago with the building of the nearby train stabling.
- The equipment located in the Metro maintenance yard would be in direct view from the co-operative. The shipping containers will likely be unsightly and will have an unpleasant visual impact on the co-operative. Photos below show the poor visual presentation of the existing shipping containers.
- Removal of the two trees in the land nominated to be acquired will increase the intrusion from the development and use of the new yard upon the amenity of the co-operative.
- Council is concerned that that the re-design of the maintenance yards will have health impacts for children and the staff at the co-operative. For example, impacts due to the following:
 - Emissions, dust and noise from trucks and works in the yard;
 - Contamination if noxious materials are stored in the shipping containers, or elsewhere on-site, and not properly managed. The proximity of three shipping yards to the main co-operative building and to the vegetable gardens is a particular concern in regard to this matter;

- Fire, if the materials in the shipping containers ignite.
- The reduced amenity for the co-operative may undermine the future viability of the use of the site for early years care and education.
- The loss of space to the land acquisition leaves no option for the service to extend its fence line on its northern side should it need to do so in the future due to a wish to expand its service, or to meet changes to national regulations relating to required outdoor space.
- Whilst the northern side currently is not an emergency exit, this may need to change in the future and access needs to be flexible.
- With the heightened proximity of the yard, there is increased potential for workers' behaviour, including yelling and swearing, to impact on the children.
- There is the potential for trucks travelling from the yard through the proposed Council car park to have accidents with the co-operative community when children are being picked-up and dropped-off. This could have disastrous consequences.

These are all significant concerns which relate to potential impacts on human well-being and safety, the amenity of the co-operative and the co-operative's future ability to expand and meet its legal requirements. In Council's view it is unacceptable for LXP to propose these risks for the sake of "squeezing in" a particular amount of additional commuter car parks. Council strongly objects to the State Government proposing to acquire a portion of 16 Panther Place for the purpose of providing part of a new maintenance yard. This acquisition is not acceptable or appropriate.

Council also has issue with the vague nature of LXP's proposed acquisition of land at 16 Panther Place. As noted above, on the one hand LXP has nominated to Council that it wishes to acquire 150 square metres of the site and on the other, has stated that the actual acquisition required is yet to be confirmed by a proper survey. This means that Council and the community must respond, during what appears to be the only round of consultation for the project, to a vague, but potentially highly significant and intrusive acquisition of land.

More generally, Council finds it unacceptable that the proposed acquisition of the land from 16 Panther Place, the re-location of the maintenance yard and the proposed use of the land to be acquired are not demonstrated in the current consultation material for the project. All these aspects of the proposal have significant implications for the community and a key Council community asset. The omission of these aspects, as with others in the plans (e.g. the omission of vegetation removal), significantly brings into question the extent to which LXP is satisfying the statutory requirement of Clause 52.03 to consult with Council and the community.



Existing Metro maintenance equipment (above)



Existing Metro maintenance equipment (above)



Proposed Metro maintenance yard & Co-Op interface (above, yellow highlight indicating new storage containers)



Proposed Metro maintenance yard & Co-Op interface (above)

Lack of Planning for Bicycle Infrastructure

The proposed bicycle parking is randomly located and without necessary security and weather protection required to encourage its use. The multiple locations for the proposed infrastructure, in addition to the exiting secure and protected bicycle parking, unnecessarily disperses the infrastructure and may undermine its use and maintenance.

Requested Changes to the Eltham Proposal

Council requests the following change to the design of the Eltham proposal:

- Do not propose to acquire part of 16 Panther Place. This aspect of the proposal excessively impacts on the Eltham Childcare Co-operative, with potentially very serious consequences.
- If LXR needs to relocate the maintenance yard, it should look to re-locate it to a more appropriate location on the Melbourne railway network. In Council's view, it is not appropriate to have such a yard within an activity centre.
- Re-design the proposal to avoid and minimise the anticipated loss of vegetation, particularly to prevent loss of:

- Trees located between Main Road and the railway line;
- Vegetation located along Youth Road and in the existing station car parking which is adjacent to Youth Road; and
- The two trees located just north of the Eltham Childcare co-operative, which should be retained in response to Council's request that the State Government not acquire part of 16 Panther Place.
- Redesign the proposal so that any provision of additional bicycle parking is protected and secure, and any additional bicycle parking on the eastern side of the railway line is integrated with existing secure and protected bicycle parking.

To achieve these outcomes, Council re-iterates its recommendation that LXP consider fundamentally re-designing its proposal for Eltham. For example, to instead propose to provide significant additional formalised car parking along the eastern side of Youth Road (see photo below). This land is currently flat, used as informal parallel parking and devoid of vegetation. It strongly appears that additional formalised parking could be provided there without any appreciable impacts on vegetation.



In re-designing the proposal, Council urges LXP to be prepared, in order to achieve a better community outcome, to reduce the amount of additional car parking it proposes for Eltham. On this matter, it should be taken into account that over the last 18 months the implications of COVID on the way people work and live appears to have now irrevocably changed need for commuter parking, particularly reducing the long-term need for many to commute as regularly to the CBD.