

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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Table of Contents

Introduction	4
Eltham Railway Station	4
Impacts on Vegetation.....	4
Contribution of Vegetation to the Railway Precinct and Surrounds	4
Removal of vegetation for new car parking spaces off Youth Road	5
Removal of two significant trees abutting the Eltham Childcare Co-operative	7
Removal of trees in existing car parking in Youth Road	8
Removal of three large trees fronting Main Road	9
Lack of Regard for Avoid and Minimise Vegetation Removal.....	10
Lack of disclosure of tree removal in consultation plans.....	10
Impacts on Community Uses – Eltham Child co-operative	10
Proposed Acquisition of Land at 16 Panther Place for the Maintenance Yard.....	10
Lack of Planning for Bicycle Infrastructure	13
Requested Changes to the Eltham Proposal	13
Wattle Glen Railway Station	16
The Wrong Site for the Car Parking – Impact on Local Character	16
The importance of rural character to the community.....	16
Council’s Wattle Glen Public Realm Framework Project	16
The role of the intersection of Kangaroo Ground-Wattle Glen and Heidelberg-Kinglake Roads in setting Wattle Glen’s rural character.....	17
Aerial of the project site and surrounds at Wattle Glen.....	18
Issues with the proposed siting of the car park for Wattle Glen.....	19
Lack of proximity for commuters.....	20
Safety Concerns for Traffic and Pedestrians.....	20
Parallel Parking Bays on Main-Hurstbridge Road	20
Access to the car park on the roundabout	20
Impacts on Vegetation.....	21
Requested Changes to the Wattle Glen Proposal	21
Conclusion.....	23

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 LXR 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

LXR 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.

(LXR 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 LXR 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 LXRP 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 LXRP's proposed acquisition of land at 16 Panther Place. As noted above, on the one hand LXRP 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.

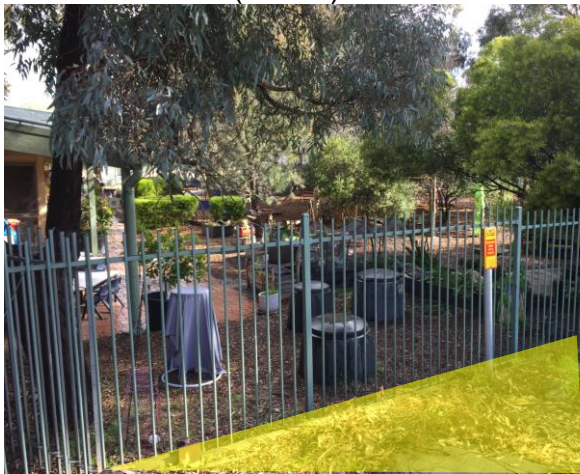
More generally, Council finds it unacceptable that the proposed acquisition of the land from 16 Panther Place, the re-location of the maintenance yard and the proposed use of the land to be acquired are not demonstrated in the current consultation material for the project. All these aspects of the proposal 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 LXRP 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 LXRP 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 LXRP 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 LXRP 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.

Wattle Glen Railway Station

LXRP's proposed plan for Wattle Glen shows the additional 50 car spaces being primarily provided in new car parking that will be constructed in vicinity of the west side of the roundabout intersection of Kangaroo Ground-Wattle Glen and Heidelberg-Kinglake Roads (the roundabout). Most of this parking will be in one large new off-road car park, with the exception of 5 parking spaces that will be provided as parallel spaces on the southern approach to the roundabout.

Council has significant concerns regarding the proposal for Wattle Glen, particularly with the proposed siting of the car parking adjacent to the roundabout and the impacts it expects this will have in relation to the local character and safety. These issues are explained as follows.

The Wrong Site for the Car Parking – Impact on Local Character

The importance of rural character to the community

Most land in Wattle Glen is outside the Urban Growth Boundary and located within the Nillumbik Green Wedge. Reflecting this, the area is typified by rolling hills and significant areas of pasture and native vegetation. The area has a strong rural and bushland feel and Wattle Glen largely presents as a rural community.

The rural and bushland character of much of the Shire is strongly cherished and supported by the Nillumbik community. For example, Council recently conducted an extensive consultation campaign over February to March 2021 across the Shire, which asked the community to identify what is important to them in relation to their well-being, neighbourhood and surrounds. In the response provided, there was strong support for protecting local character and preserving the Green Wedge (i.e. the rural and bushland areas of the Shire).

Council's Wattle Glen Public Realm Framework Project

Council is currently undertaking a project, the Wattle Glen Public Realm Framework Project, which aims to plan improvements to the public realm in the heart of Wattle Glen (in consultation with the local community) for the following objectives:

- To better capture and portray the community's preferred character for Wattle Glen; and
- To provide safer linkages, particularly for pedestrians and cyclists, between the various key destinations in the heart of Wattle Glen, such as between the Diamond Creek Trail, the railway station and the main community park, namely, Pepper's Paddock.

Council is currently undertaking community consultation on this project and the response to date similarly indicates a strong desire in the community to maintain and enhance rural and bushland character. For example, in response to a question of what do you value most about Wattle Glen, some answers provided to date, include:

- *Country environment;*
- *The country feel – please don't change it;*
- *Nature – the rural setting, trees, country feel, community;*
- *The comparative quiet, country town feel; and*

- *It feels rural, while being close to metropolitan amenity.*

The role of the intersection of Kangaroo Ground-Wattle Glen and Heidelberg-Kinglake Roads in setting Wattle Glen's rural character

Based on work to date for the Wattle Glen Public Realm Framework Project, Council is of the view that the intersection of Kangaroo Ground-Wattle Glen and Heidelberg-Kinglake Roads (the roundabout), with the adjacent land, is very important to setting and enhancing the rural character of Wattle Glen. This is for the following reasons:

- The heart of Wattle Glen is located in proximity of this roundabout and includes Pepper's Paddocks and the Pepper's Paddock General Store and a range of additional community facilities located in proximity, such as the Tennis Club.
- Heidelberg-Kinglake Road (known south of the roundabout as Main-Hurstbridge Road) is the main road connecting the heart of Wattle Glen into the surrounding road network. For example, it provides the main connection to the north between the heart of Wattle Glen and Hurstbridge and to the south to Diamond Creek and beyond to the bulk of suburban Melbourne.
- As traffic passes through and in proximity of the roundabout it is provided with the major views of the heart of Wattle Glen and its surrounding rural setting.
- The surrounding rural setting is highly evident on the west side of the roundabout where there are clear and strong rural vistas, which are largely uninterrupted by any urban or suburban style infrastructure. This view shed to the west is noted in the aerial below of the intersection and surrounds.

In short, the roundabout and adjacent land are highly strategic to setting a rural character for Wattle Glen due to the visibility, high exposure of the site and key uninterrupted rural vistas it provides.

Aerial of the project site and surrounds at Wattle Glen



Council's work for the Wattle Glen Public Realm Framework Plan indicates that there is a real opportunity with the roundabout and adjacent land to significantly reinforce and enhance a preferred character for Wattle Glen and that this could be done by:

- Protecting the rural setting in proximity of the roundabout;
- Providing clear, but sensitive, indication that the intersection is a key entrance point to Wattle Glen. For example, by incorporating public art that showcases Wattle Glen's preferred character; and
- Providing and ensuring a safe environment in proximity of the roundabout, particularly for pedestrians and cyclists.

These opportunities will be explored with the local community as part of Council's project.

Issues with the proposed siting of the car park for Wattle Glen

A particular issue with the proposed siting of the car parking is that it will significantly de-tract from the rural views on the west side of Heidelberg-Kinglake Road in vicinity of the roundabout. Land that is currently an established grassy area with some larger vegetation and which links well with the rural and bushland backdrop will be replaced by a significant expanse of at-grade car parking. In short, a rural setting will be replaced with a very suburban one. This is unacceptable given the high strategic significance, detailed above, of the roundabout intersection and adjacent land to setting the rural character for the heart of Wattle Glen.

Council imagines that these impacts will be severe not only in the daytime, but also at night time. The car parking will presumably need to have lighting, not only within the new car park itself, but also for commuters walking the significant distance between the station and the car parking. This will introduce significant light pollution on the western side of the road and intersection and will highlight the presence of the at-grade car parking.

A key aspect of the visual intrusion of the proposed siting of the new car parking is that it will significantly extend and broaden the amount of land in the heart of Wattle Glen which is visually dedicated to railway infrastructure. The railway station is located quite some distance to the north, as can be seen in the aerial above, and this proposal will visually and significantly extend hard surfaces and infrastructure for the railway a long way south from the existing railway precinct. It will give the station precinct a sprawling and visually intrusive appearance.

This approach of making the railway precinct sprawl through a rural setting is highly contradictory to good practice for protecting rural landscapes. Good practice and relevant planning policy supports consolidating any development, so as to minimise its visual intrusion on the landscape and minimise interruption to rural vistas and backdrops. A particularly disappointing and frustrating aspect of LXP's proposal is that it appears highly possible to consolidate the additional car parking elsewhere within the existing station precinct, where its impacts will be significantly less. There is significant under-utilised disturbed land within the railway precinct that is located between the station platform and Wilson Road. Additional parking could be provided in this area and designed in a manner which is much better visually connected to, contained and consolidated within the existing station precinct and where it will not impact on rural vistas adjacent to the roundabout.

A further issue for Council is that the proposed location of the at-grade parking is expected to significantly undermine the potential benefits of Council's Wattle Glen Public Realm Framework Project. As noted above, Council has identified the roundabout as one part of Wattle Glen that could be enhanced to significantly improve a sense of place and preferred local character for Wattle Glen. However, locating a significant expanse of at-grade car parking adjacent to the roundabout will be totally contrary to efforts to achieve that outcome. The car parking structure will be simply so large, prominent and suburban in nature that it will create an indelible visual impact that the Council project will not be able to address or compensate for.

Council wishes to highlight its view that landscaping will not be a solution to the expected visual impacts of the proposed siting of the additional car parking. Whilst landscaping may soften the visual impact of the car park, the development will still quite clearly read as a large suburban structure, a commuter car park on the main approach to the heart of Wattle Glen. This will be the case day and night.

Lack of proximity for commuters

Council also notes that the proposed location will place the car parking a considerable walking distance from the platform. Commuters will have to walk far further than is currently the case to move between the station and the car park. This represents a further walk in the heat, the rain, the cold and (at night time) in the dark. It brings into question the appropriateness of the proposal in providing car parking which optimises public safety for commuters moving to and from their vehicles and which adequately prioritises the needs of particular groups, such as the elderly or people with young children, who may struggle more with the longer distance and being exposed to extremes in weather for that extra duration.

This additional distance is a confusing aspect for Council of the proposal, as it appears highly appropriate for the project to place the car parking closer to the station by using the highly disturbed area located between the station and Wilson Road.

Safety Concerns for Traffic and Pedestrians

The proposed location for the parking raises a number of safety concerns, including:

Parallel Parking Bays on Main-Hurstbridge Road

At the proposed location, the proposed five parallel parking bays will be on a 70km/h posted speed limit declared arterial road. This appears to be dangerous aspect of the proposal, which creates a number of scenarios for traffic accidents. For example, between vehicles exiting the parallel car parks and vehicles travelling past them towards the roundabout. Council emphasises that this is a high volume road and that even with a reduction in speed to 60km/h, the proposed parallel parking will create an interruption and scenario that will put safe traffic flow at risk.

Access to the car park on the roundabout

The proposed design has one access and egress point for the new large area of car park next to the roundabout, which will be via a new crossover to be located on the western side of the roundabout. Council is concerned that this aspect of the proposal will:

- Appreciably increase the potential for accidents between vehicles seeking to enter the new car park and any vehicles behind them (from the south) which wish to move through the roundabout. The reason for this concern is that the southern approach to the roundabout takes a high volume of traffic which is moving at speed towards and through the roundabout. A car wishing to turn left at the roundabout, unless careful in providing significant warning of its intent to do so, raises the potential for a tailgate crash. This would particularly be the case if there some congestion at the entrance to the car park (e.g. in the morning peak, or if pedestrians are crossing the car park entrance) and particularly if, because of this congestion, a vehicle cannot move smoothly off the roundabout into the car park.
- That there is significant potential for conflict between traffic moving off the roundabout (into the car park) and users of the shared used pathway to be provided along the west side of Main-Hurstbridge Road. By way of explanation, cars seeking to move off the intersection into the car park will likely be under pressure to do this with some speed given the volume and speed of traffic which typically moves through the roundabout from the southern approach. However,

the design places a pedestrian line directly across the entrance to the car park. This creates the real likelihood of conflict between a car exiting and pedestrians.

A key point that Council wishes to make in relation to all the safety concerns highlighted above is that they are intrinsically linked to the proposed location of the new large car park, noting:

- The proposed location requires an additional access point from Main-Hurstbridge Road at, or in close vicinity, to the roundabout.
- There is insufficient space at the proposed location to provide all the car parking off the road, which has resulted in LXP proposing some on-road parking.
- At the proposed location, the design has to address significant issues created by the high volume of traffic, the speed of traffic and conflict between getting traffic off the roundabout and providing a path along the road.

These points support and highlight a consistent theme in Council's response to the Wattle Glen proposal, which is that the proposed car parking is in the wrong position.

Impacts on Vegetation

The expected impacts on vegetation from the proposal are not clear. There is some vegetation in the proposed area of development, but the consultation plans do not specify there will be tree removal. As such, Council cannot provide a view on whether the evident tree removal has been sufficiently minimised.

Council notes that no landscaping plan has yet been provided with the proposal. For example, no landscaping is shown in the available site plan. This should be provided as part of the proposal. Having said that, Council re-iterates its point that landscaping will not address the issues that will be created by the proposed siting of the car park.

As part of the consultation there should also be perspective illustrations representing the proposal to assist Council and the community to understand what is proposed. Further, the detail plans provided to Council should also be made publically available.

Requested Changes to the Wattle Glen Proposal

Consistent with Council comments above, Council contends that if the State Government wishes to pursue providing 50 additional car parking spaces, the car parking should be sited significantly further north between the existing railway platform and Wilson Road.

This site is shown in the following image and the blue arrows indicate disturbed land where it appears suitable to locate the proposed car parking.



At this location, the parking:

- Could use ground that is already significantly disturbed in close proximity to the railway platform.
- Would visually be more connected and consolidated with the existing railway precinct and associated car parking.
- Not impact on the rural vistas provided at the roundabout intersection and the approach to that intersection.
- Be closer to the railway platform therefore providing greater ease, comfort and safety for commuters.
- Not need to provide dangerous access arrangements which conflict with the roundabout. There should be the opportunity to use existing access arrangements for the railway station.
- Could be provided while still allowing for additional railway development, such as for development associated with the existing substation.

Council can see no sufficient reason as to why the car parking should not and could not be located north of the station platform as suggested above. The impacts for Wattle Glen that would be avoided by using this alternative site far

out-weigh the additional cost and time that LXRP might incur in responding to any of the additional issues associated with the site.

As part of facilitating such a change to the proposal, Council contends that LXRP should consider providing less than 50 car parks if that assists. For example, if LXRP believes only 40 car park spaces can be sensitively provided between the existing station and Wilson Road, then Council would argue that there is a strong case to only provide that 40 spaces, noting:

- That locating the additional car parking next to, or north of, the existing station appears a significantly more positive outcome overall, as it appears a safer option and significantly better protects the character of Wattle Glen.
- As mentioned in relation to the Eltham proposal, the current COVID situation may have irreversibly reduced community demand for commuter parking.

Conclusion

Council does not support the current proposals of the State Government's Car Parks for Commuter Projects for either Eltham or Wattle Glen. Both proposals have been designed without proper regard for outcomes, other than, in Council's view to deliver the additional car parks promised by the Carparks for Commuters Project within a compressed timeframe. As a consequence, both projects are expected to have excessive and unwarranted impacts on other matters in both localities.

In Eltham, it is expected that there will be excessive and unwarranted tree loss, which will impact on the local character of Eltham and that there will be significant adverse impacts 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, potentially 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 each proposal.

In this submission, Council has suggested a preferred design for each proposal which provides additional formalised car parking and still supports broader social, environmental and economic objectives.

In Eltham, Council suggests LXRP fully consider using the eastern edge of Youth Road to provide additional formalised car parking and modifying the design of some other parking areas to prevent tree loss.

In Wattle Glen, Council suggests placing the car parking between the railway platform and Wilson Road.

Achieving the more holistic and beneficial outcomes offered by these alternatives may require LXRP to compromise on the extent of car parking proposed. Council contends that this would be an acceptable and sustainable outcome given the long-term impacts that COVID has brought to future transport infrastructure needs and the region's long-term needs for commuter parking.

