



Whitehorse City Council submission

Urban Design and Landscape Plan

North East Link

Eastern Freeway Upgrades – Burke Road to Tram Road

November 2023

EXECUTIVE SUMMARY

1. Whitehorse City Council (Council) unfortunately is unable to support the North East Link (NEL) Urban Design and Landscape Plan (UDLP) for the Eastern Freeway upgrades between Burke Road and Tram Road, in its current form.
2. The UDLP applies to the City of Whitehorse from east of Sweyn Street Balwyn North through to Station Street (Tram Road) Box Hill North, on the south side of the Eastern Freeway. Council's interests however do not cease at the municipal boundaries, particularly where there are impacts to integration and continuity.
3. The widening of the Eastern Freeway will have a significant impact on residents, visitors and the environment within the City of Whitehorse. Our community care deeply about the immediate impacts to their local area, their back yards, the spaces that they play and exercise in, and the spaces that they enjoy watching the thriving vegetation and wildlife.
4. Council has worked with the Victorian Government over many years to look for ways that the NEL project can meet its transport objectives while minimising and mitigating the social, environmental and amenity impacts of the road widening.
5. Council strongly advocates for the Victorian Government to continue to consider the impacts at a local level, not just at a whole of project scale.
6. While the recent conversations with Government representatives have been encouraging, it is disappointing that these have not translated into tangible commitments displayed in the exhibited UDLP. Council acknowledges that the designs for the project will evolve, however Council can only comment on what has been exhibited. These plans unfortunately fall short of Council's expectations for appropriately mitigating the adverse effects of the project on the Whitehorse community.
7. The impacts of the widening of the Eastern Freeway on the Whitehorse community and environment include (but are not limited to):
 - a) Increased vehicle traffic volumes on the Eastern Freeway and arterial roads, resulting in noise and air quality concerns for the community;
 - b) Extensive loss of vegetation;
 - c) Decrease in usable open space, including designated dog-off-lead areas;
 - d) Poor amenity outcomes due to noise walls very close to residential properties and walking and cycling paths;
 - e) Undergrounding of the Koonung Creek in multiple locations; and
 - f) Poor walking and cycling outcomes due to the inconsistent reconstruction of the Koonung Creek Trail.
8. It is Council's opinion that the UDLP does not demonstrate that these impacts have been appropriately mitigated.
9. The UDLP has been presented in a way that makes it difficult to assess other effects on Council land and the people who live and visit the City of Whitehorse. In many circumstances, the plans are hard to interpret.

10. The UDLP attempts to link design and place ideologies that could be significantly strengthened in the City of Whitehorse project area. This is particularly relevant in how the design output is addressed in being a *freeway within a landscape* and *touching the earth lightly*. In Council's opinion, the design response does not clearly demonstrate this.
11. The representation of the design in integrating and addressing the Wurundjeri Woi-Wurrung through their *Connection to Country; Caring for Country and Connecting People* is limited in how this meaningfully occurs in the design response.
12. The Victorian Government have the opportunity to make a positive contribution in Whitehorse and beyond. By switching the focus to 'people' and the 'environment' rather than focussing on road structures, the community, vegetation and wildlife will benefit while still achieving the transport goals.
13. Council believes that modest enhancements to the designs can make vast improvements to the project outcomes and provide a positive legacy for the Whitehorse community.
14. Council wishes to continue to work with the Victorian Government to refine the plans. The key changes Council is seeking to the UDLP include (but are not limited to):
 - a) Reduction in the footprint of the Eastern Freeway widening.
 - b) Provide cohesive and well integrated public spaces and design outputs for the project corridor, and specifically for those elements that are within the City of Whitehorse, that become a project legacy and will be well utilised for years to come by the community.
 - c) Demonstrate that the noise, air quality and other environmental concerns of the community have been addressed.
 - d) Provide further information to Council as requested throughout this submission, eg flood modelling.
 - e) Provide new open space (including dog-off-lead areas) on the south side of the Eastern Freeway to compensate for the loss of usable space.
 - f) Increase the tree canopy replacement rate to 3 trees for every tree removed within Whitehorse.
 - g) Upgrade the Koonung Creek Trail (KCT), within and outside the NEL project boundary, including:
 - Resurfacing the full length of the path
 - Install smart solar lighting along KCT, as well as new seats, shelters, public fitness equipment, bike repair stations and wayfinding signage.
 - Addressing 'pinch points', including setting back the southern retaining wall at the rear of Jocelyn Avenue properties.
 - Improve the safety, accessibility and aesthetics of the Elgar Road underpass.
 - h) Construct an elevated boardwalk at Valda Wetlands that is accessible for all abilities and usable in all weather conditions.
 - i) Expand the playing surface area at Elgar Park North West.
 - j) Enhance Frank Sedgman Reserve.

COUNCIL'S STRATEGIC DIRECTION

15. The 'Whitehorse 2040 Community Vision' documents the long term aspirations of the community, outlining what they would like Whitehorse to look like into the future.
16. The 'Council Plan 2021-2025' outlines seven strategic directions that are inspired by the Community Vision and guide Council activities and decisions into the future. Council encourages North East Link Program (NELP) to incorporate the strategic directions within its project plans and designs, working collaboratively with the Whitehorse community to translate these themes to action:
 - i. An innovative Council that is well led and governed
 - ii. A thriving local economy with high quality accessible education opportunities
 - iii. A culturally rich, diverse, creative and inclusive community
 - iv. A built environment that encourages movement with high quality public places
 - v. Sustainable climate and environmental care
 - vi. An empowered collaborative community
 - vii. A safe and healthy community

EASTERN FREEWAY

17. Council is extremely disappointed to see that the width of the Eastern Freeway has not been reduced (other than a very small section) compared to the Reference Design presented during the Environmental Effects Statement (EES) phase.
18. The Minister's assessment of environmental effects states that *"the traffic performance and functionality of the project needs to be balanced against the environmental effects of the built form"*¹.
19. Council is of the view that the UDLP does not display that this 'balance' has been achieved within the City of Whitehorse.
20. A more considered design is required to match the transport benefits the Victorian Government is seeking and the environmental, social and amenity costs that the Whitehorse community are being asked to bear in the name of that benefit.
21. The advantages of a smaller footprint of the Eastern Freeway include:
 - a) The environmental impact upon Koonung Creek could be minimised, especially negating the need to underground some sections of the creek within the City of Whitehorse;
 - b) Reduced visual, noise, air and amenity impacts to users of surrounding areas.
 - c) The human and wildlife community will benefit from the retention of mature vegetation that will continue to thrive;
 - d) Negative impacts to the outlook of adjacent residents would be minimised by not installing noise walls within metres of their back fences;
 - e) There will be fewer surface water attenuation requirements; and
 - f) The negative experience for pedestrians and cyclists during construction and operation would be diminished.

¹ North East Link Minister's assessment of environmental effects, November 2019, page 23

22. Given the impacts of the exhibited design of the Eastern Freeway, Council seeks a strengthened response to the proposed treatments for Koonung Creek Parklands and surrounding areas. This is needed to ensure mitigation measures are commensurate to the impacts within the City of Whitehorse. This is discussed further throughout Council's submission.
23. Environmental Performance Requirement (EPR) LP1 requires the project to be designed and constructed to minimise the impact to the greatest extent on parks and reserves and sport and recreation facilities.
24. Page 33 of the Ministerial Assessment of Environmental Effects outlines the Minister's intent for EPR LP1:
"I consider that the implementation of the IAC's recommended changes to EPR LP1 (IAC Recommendation 18) will likely assist in achieving a narrowing of the ultimate road alignment to provide improved visual, landscape and urban design outcomes. This EPR applies to the entire project alignment, but it is particularly important that consideration is given to the key interfaces identified by the IAC, including along the Eastern Freeway where it is adjacent to residential properties and valued open space, and the proposed locations for construction compounds."
25. Council considers that the Minister's intent for a narrower road alignment has not been achieved and therefore suggests that EPR LP1 has not been appropriately applied to the design.
26. The plans within the UDLP do not show the degree of encroachment of the freeway corridor to the south. A dashed line indicating the location of the existing freeway corridor fencing, as well as local government boundaries, could be added to the landscape and architectural drawings.
27. Without this information, an accurate understanding of the exact impact to Council land is not known. It is considered that a fundamental element of an UDLP would be for land owners to be able to understand if and how the designs are impactful.
28. To assist with preparing Council's submission, indicative plans were prepared to form an understanding of the degree of encroachment into the open space corridor. These are presented in the 'Open Space Impacts' section of this submission.
29. The drawings of the proposed open space to the south of the Freeway present as aesthetically pleasing graphics but do not paint a full picture of the before/after project effect. The addition of aerial image maps with showing the expanded freeway corridor into the landscape plan package would be helpful in accompanying the design outcome plans.

UDLP DRAWING DETAIL AND LEGIBILITY

General lack of detail illustrated on landscape plans relative to equivalent UDLPs

30. Across the UDLP package, there are issues relating to drawing legibility and level of detail of information provided. The issue of detail is primarily linked to:
- a) The high-level scale of drawings provided at 1:2000 and 1:5000, affecting legibility.
 - b) The high-level scale of drawings that do not detail the functional or character elements of existing or modified public spaces.
 - c) The legibility of legend items applied to landscape areas, particularly regarding encumbered and unencumbered land.
 - d) The lack of noise wall information provided regarding where typologies are intended to be applied.
 - e) No indication provided of the existing freeway corridor extent, resulting in difficulty in understanding the before and after effect of the widened freeway corridor.
 - f) Lack of indication of levels and topography.
 - g) General reliance on delaying details to future design exercises.
31. The provided landscape and architecture drawings at 1:2000 and 1:5000 scales limit the provision of detailed information. An obvious benchmark is the approved NEL Tunnels UDLP which comprises plans at 1:500 scale and illustrates far more detail regarding the design vision and composition of public spaces and proposed project elements. Details that the Tunnels UDLP approved drawings contain, but fall short in the Eastern Freeway UDLP, include:
- a) Far clearer indication of 'green' and 'blue' landscaping (ie. unencumbered vs encumbered landscaping treatments' through intuitive colouring and texture as pictured below:



NEL Tunnels UDLP, attachment 2

- b) Far greater design resolution of open spaces, including illustration of playgrounds, active recreation opportunities, fitness stations, seating nodes, BBQ and picnic facilities, as pictured below:



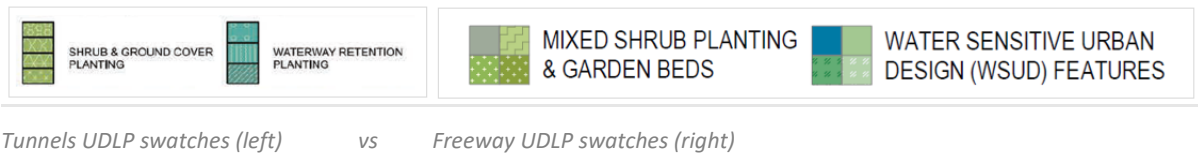
NEL Tunnels UDLP, attachment 2

- c) More detailed approach to path materials, such as the indication of timber boardwalks through wetland areas.
 - d) Clearer indication of levels through illustrating stairs in segments of paths.
 - e) More frequent and detailed annotations.
32. At 1:2000 and 1:5000 scale, the Eastern Freeway UDLP is very difficult to assess particular project treatments including:
- a) The provision of landscape screening along noise walls, such as along the narrow pinch point to the rear of Jocelyn Avenue properties where no landscape buffer or planting strips are illustrated in the landscape plan (or legible enough to see at scale).
 - b) How transitions between proposed and existing shared user paths are navigated – particularly where they enter and exit the project boundary where path widths may vary.
33. The cross sections lack dimensions in the landscape plans package, with noise wall heights annotated as 'indicative only.' As these cross sections are drawn to scale at 1:200, and the noise wall heights exist mapped in the architectural package, there is further frustration about the level-of-detail, legibility and document navigation.
34. The approved NEL Tunnels UDLP approach paints a far clearer picture of the envisioned 'look and feel' of spaces created or impacted by the project, for a range of audiences to decipher. While NELP and the preferred tenderer may consider this approach too detailed, it has been well documented that these plans are conceptual and 'to be in general accordance with' in future design stages – similar to that of a Development Plan mechanism in the Planning Scheme. At this stage of the project, Council hoped to see plans that offer more detail. The detail provided is little more than what was illustrated during the EES.
35. A 'middle ground' between the level of detail shown in the approved Tunnels UDLP and the proposed Eastern Freeway UDLP should be pursued. Detailing the precise linework for items such as basketball courts or BBQ shelters may not be necessary, but schematically illustrating the location of public realm elements is expected at this project stage – to illustrate how the design directions, objectives, requirement of the Urban Design Strategy (UDS) and statements within the UDLP report are envisioned to spatially materialise.
36. The concurrently exhibited NEL 'Ring Road Completion' UDLP does not comprise as much detail as the approved Tunnels UDLP, but contains more detail than is illustrated in the Eastern Freeway UDLP. This includes splitting existing vs proposed tree canopy on the landscape plans, and more illustrative information regarding public realm elements such as seating nodes.
37. More detailed work has clearly underpinned the 3D modelling required to produce the 3D visualisations. These would not have been possible without a more resolved design than those that were illustrated in the landscape plans. There appears to be a disconnect between the level of detail shown between these two important visual types.

Legibility of materials and landscape palette

38. Deciphering the legend is difficult for some items in the UDLP, particularly the various swatches of landscape treatments between 'Mixed Shrub Planting & Garden Beds' and 'WSUD Features,' which share similar tones of green. The applied textures become clearer if the reader 'zooms in' very closely, at which point it is difficult to read the plans at a holistic precinct scale.

39. Unencumbered areas of planting should be illustrated in tones of green while Water Sensitive Urban Design (WSUD) plantings and features should be more clearly illustrated with blue tones, as applied in the Tunnels UDLP, to improve the legibility and interpretation of the landscape plans.



Lack of topographic/ level information

40. The UDLP does not provide any insight regarding slope and levels. The creek escarpment is a key access barrier in some segments of the corridor, but the plans can be deceiving in illustrating land as though it is flat, open, accessible and usable. The use of contours, gradient or other graphic means would be useful for a more fulsome assessment of the accessibility and function of remaining open spaces illustrated in the plans to occur.

Lack of noise wall information

41. While the designs of noise walls appear to have the foundation for a site responsive and visually interesting outcome (in terms of colours, materials and textures), there is no information regarding where each noise wall type are to be spatially located. This makes it very difficult to assess their appropriateness relative to their immediate surrounds and broader context.

3D Visualisations

42. The 3D Visualisations provided in the visualisations package and available online provide the best indication of the envisioned 'look and feel' of places. As mentioned above, there appears to be more detailed design work that has gone into producing them, but only limited detail has been provided within the landscape and architectural package.
43. While the Visualisations may be considered aesthetically appealing, they are arguably misleading to the community given that the dense vegetation – particularly as the trees that are depicted could take decades to mature into the form illustrated in the renders. The following recommendations are sought for greater transparency to the community and stakeholders:
- a) That visualisations illustrating the 'end product' are clearly annotated to reference that they represent the long term ambition of the urban design and landscape response to avoid misrepresenting the landscape outcome in the short term.
 - a) Additional visualisations are added to the UDLP Attachment 3, showing the landscape establishment in increments, such as Year 0, Year 5, Year 10 following project completion. This is particularly important in communicating the envisioned 'look and feel' of places in the short term, where elements such as the noise walls will be far more visually exposed to adjoining open spaces and residential areas in the short and medium terms.

Summary fact sheet

44. The fact sheet published as a summary of the UDLP on the Engage Victoria website and the North East Link website, includes a map that is missing an entire section of the project within the City of Whitehorse. The section between Elgar Road and Tram Road/ Station Street is not shown on Map B. Summary fact sheets are a key source of information for many residents and community members. Many who live between Elgar Road and Tram Road/ Station Street may not believe the project is relevant to them if they only refer to the map below.



'Map B' as shown in the UDLP Fact Sheet

ACTIVE TRANSPORT INFRASTRUCTURE

45. The Koonung Creek Trail plays a key role for commuter cycling, recreational cycling, walking, jogging and dog walking. It therefore caters to a range of abilities, confidence levels and speeds of active transport users. Its use and strategic role in the active transport network is acknowledged by its C1 classification in the Victorian Government's Strategic Cycling Corridor network.



Koonung Creek Trail is used by a wide variety of people, with all abilities, as well as being a popular area for dog walking

46. This area adjacent to the Eastern Freeway is therefore a major contributor to the health and wellbeing of our community. The NEL project has the opportunity to make positive impacts on the physical and mental health of those who live in Whitehorse, as well as those from beyond our boundaries. Council is seeking the UDLP to be amended to place people first so that the active transport infrastructure is well integrated and encourages safe, sustainable and healthy activities.

47. Throughout the UDLP documents, there are phrases that outline that the project will deliver *“high quality shared paths for pedestrians and cyclists, and creating an integrated movement corridor”*².
48. Given the UDLP proposes a patchwork approach to retaining sections of existing pathways and blending these with new pathways, it is suggested that the above statement is not accurate within the City of Whitehorse.
49. The approach adopted within the UDLP appears to be limited to only addressing paths where existing paths are directly impacted by the widened freeway corridor, or where affected by reconfigurations of open spaces. The landscape plans indicate that shared user paths (SUPs) that are not directly affected will remain as they are, despite possibly being different widths, quality and materials.
50. SUPs outside of the project boundary, even where skirting its edge, are not identified for upgrade. The subsequent ‘stitching’ of paths of mixed widths, condition, quality, materiality and colour is not considered to be an integrated, continuous or seamless outcome but rather one that represents a piecemeal approach. It is not consistent with providing infrastructure that meets universal design standards to accommodate the use and accessibility for people with limited mobility or with sensory impairments.



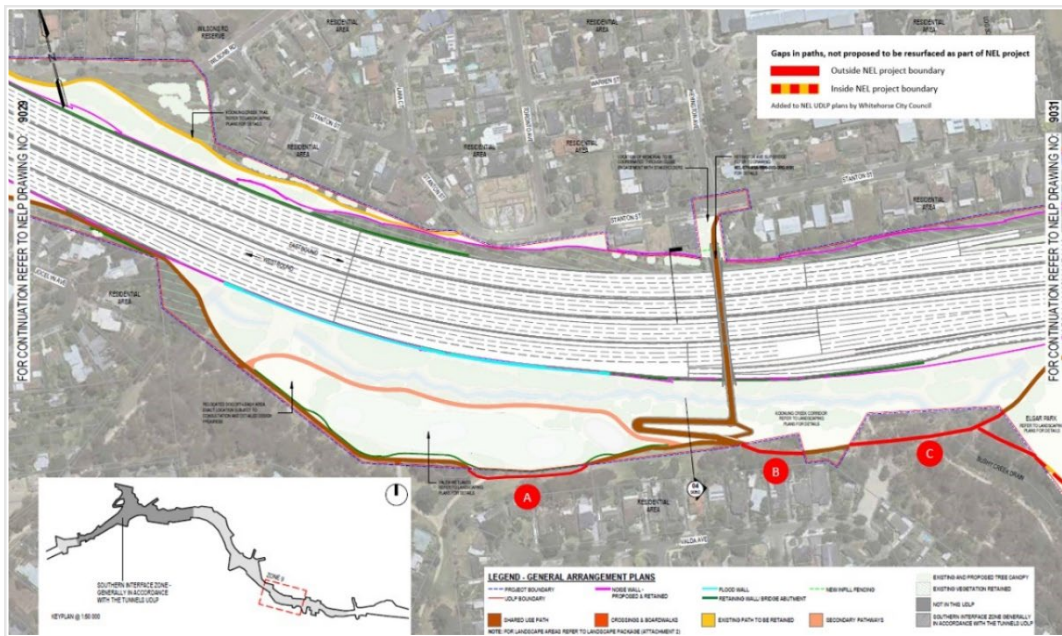
Upgrading of the entire Koonung Creek Trail is required to avoid the safety and aesthetic problems associated with mixing width, quality, condition and materiality of path surfaces.

51. There is clear disharmony regarding the approach in the UDLP and the following statement contained in section 7(13.3) of the UDS (page 96):
“The transition between cycling paths is continuous and seamless with direct routes and consistent design elements. The riding environment is safe and appealing. Extent of local and strategic cycling corridors is maximised.”
52. Active transport continuity is not limited to physical connectedness, but also continuity of quality, consistency, colour, width and SUP compliance. It is unclear how the piecemeal approach to active transport integration satisfies the UDS and related requirements.

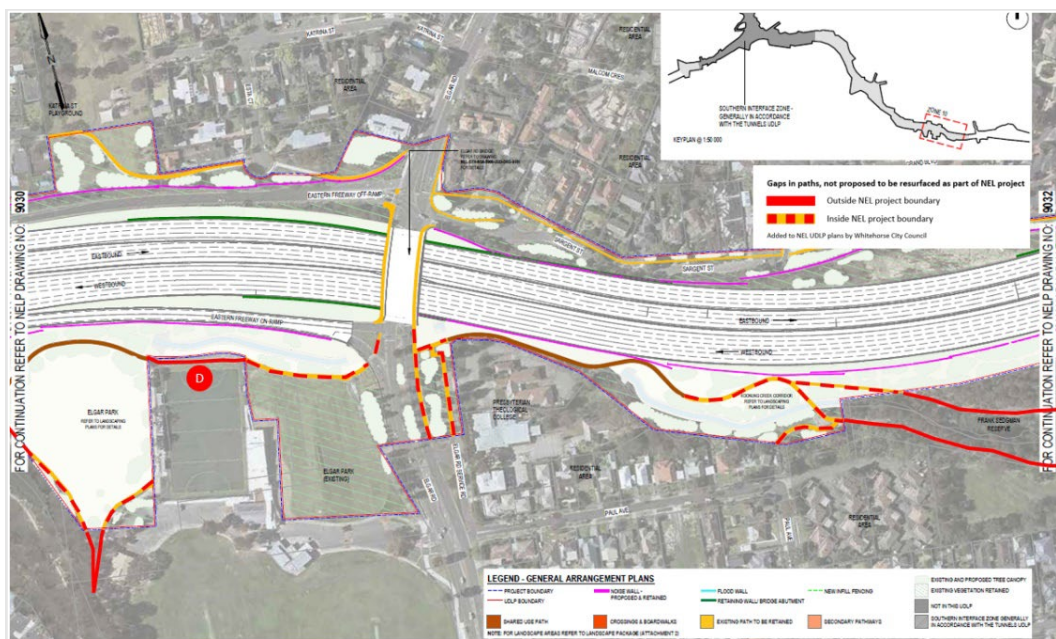
² NEL Eastern Freeway Upgrades UDLP Report – Burke Road to Tram Road, page vi

53. Obvious locations where this will occur within the City of Whitehorse include (but are not limited to):
- Southern edge of Valda Wetlands.
 - A short gap between realigned SUP to the immediate east of the new Heyington Avenue bridge ramping.
 - A further gap between the Heyington Avenue bridge and Elgar Park.
 - Gap between realigned SUP and 'existing path to be retained' narrowly skirting the project boundary to the northern edge of the Elgar Park hockey pitch.

These locations are marked on the following maps in red.



NEL Eastern Freeway Upgrades ULDP Attachment 1, Architecture and Urban Design Part 1, Zone 9.



NEL Eastern Freeway Upgrades ULDP Attachment 1, Architecture and Urban Design Part 1, Zone 10

54. Page 67 of the UDLR Report states that “a consistent minimum width of 3m applies to all new SUPs” which is in accordance with the Supplement to *Austroads Guide to Road Design (AGRD) Part 6A: Paths for Walking and Cycling (2021)* for SUP Type 2 (Commuting and/or Recreation). It is unclear however whether obstacle buffers (minimum 0.5m to each side of the path as per VicRoads standards) are provided – thereby requiring a 4m wide space to accommodate SUPs.
55. Just as important as horizontal buffers, is vertical clearance. The impact of overhead obstructions such as tree branches, are key considerations.
56. Related to the above query is how 4m paths (including the minimum obstacle buffers noted above), can seamlessly transition into existing paths that are proposed for retention (and vice versa) which may be at differing widths? It is unclear whether proposed paths will gradually narrow into these sections or leave abrupt contrasts between proposed and retained SUPs/paths of varying width, age and quality.
57. The Koonung Creek Trail is the most utilised active transport and recreational corridor in our city. It is highly valued by people from several municipalities, and ensuring it has high amenity and safety is vital. Given the anecdotal rise in cycling in recent years (commuter and recreation), and the work both by the Victorian Government and Council to encourage greater use of sustainable and active transport, Council encourages the upgrades to the SUP not to just meet the standards in the Austroads Guide, but to exceed them. Providing greater path width and horizontal clearances would future proof the infrastructure and provide an enormous legacy benefit for the community.



Given the high usage of the Koonung Creek Trail, wider paths are recommended

58. Given the extent of impacts to public space and active transport networks along the project interface, an appropriate mitigation measure would be to ensure the SUP network is entirely upgraded for a continuous and seamless outcome. This will ensure that all paths are the same quality (satisfying universal design standards) and on the same maintenance lifespan.

59. Landscaping Plans within Attachment 2 of the UDLP include annotations that state *“furniture will be reinstated”*. Repurposing the existing furniture along the alignment is not considered appropriate, nor consistent with the high calibre of project outcomes that NELP is striving for. Council is seeking:
- a) Seating, shelters and drinking fountains at key locations
 - b) Smart solar on-demand lighting along the KCT
 - c) A bicycle repair station in the vicinity of Elgar Park
 - d) Upgraded wayfinding and information signage using Council’s signage style guide
 - e) Public fitness equipment at appropriate locations
 - f) Reinstatement of the memorial plaques that are along the trail.
60. These items are consistent with UDS Detailed Requirement 7.2 that infrastructure is to be provided such as *“...seating, natural shade, drinking fountains, dog drinking bowls, emergency markers, bicycle leaning rails/hoops and rest areas”*.
61. Similar to previously discussed regarding legibility of the provided plans within the UDLP, the ‘Retained Path’ graphic lacks hierarchy and should be split between ‘Retained Shared User Path’ and ‘Retained Path.’ The plans indicate that the retained paths vary in width. Not all of them are SUPs. It is recommended that a more granular approach to illustrating the path hierarchy is applied.
62. The ‘Secondary Pathways’ legend item adds further confusion to the hierarchy of paths illustrated amidst the SUPs and ‘Existing Paths to be Retained,’ particularly given that they are, in regular instances, wider than segments of both SUPs and ‘Existing Paths to be Retained.’
63. Further clarity in the plans is required to clearly distinguish between:
- a) Proposed new SUPs as opposed to realigned existing SUPs
 - b) Existing SUPs to be upgraded
 - c) Proposed secondary paths
 - d) Existing secondary paths
64. There are instances where maintenance bays are proposed adjacent to SUP. Further information is sought (including dimensions and offset detail) to understand how maintenance bay access will avoid modal conflict with users of the SUP network – particularly given the presence of narrow pinch points – such as along the northern edge of Elgar Park sporting fields.
65. Council supports separated walking and cycling paths where there is space. This is also acknowledged in the UDS in Detailed Requirements 13 (Walking & Cycling Infrastructure):
- 13.4 - Path Separation: *“Separated walking and cycling paths are used in high-use areas where appropriate, and avoid and minimise the potential for conflict between intersecting travel paths.”*
66. Due to the extent of the freeway widening, there is however very few opportunities where this can eventuate within the City of Whitehorse.
67. The Ministerial assessment of environment effects supports the principle of inclusion of active transport complementary projects where they are *“required as a direct consequence of and/or have a direct relationship with the project”*³. Council considers that the active transport matters raised above

³ North East Link Minister’s assessment of environmental effects, November 2019, page 85

and further below in this submission have a direct relationship with the project and it is essential for them to be addressed by the Victorian Government.

Narrow pinch points along trail

68. Pinch points caused by the narrow openings between proposed noise walls and the adjoining private or public realm along the SUP network are identified at:

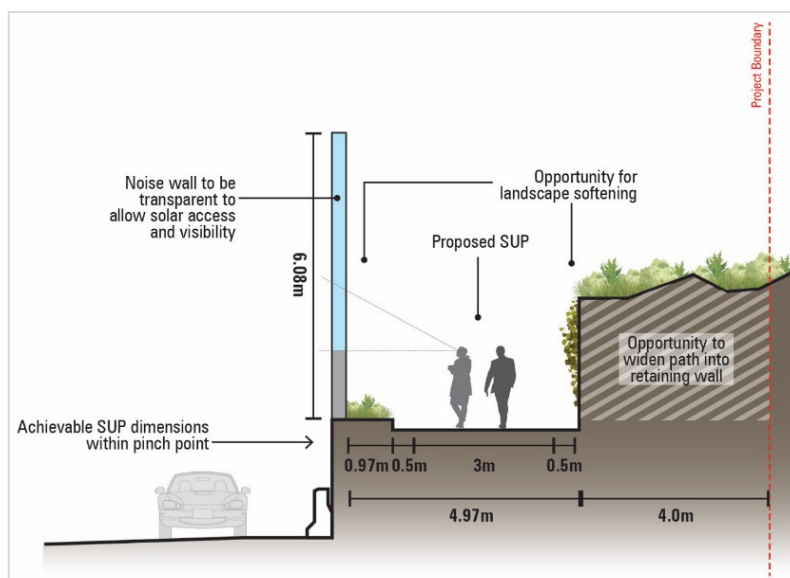
- a) Between the rear of Jocelyn Avenue properties and the Eastern Freeway corridor.
- b) Between the Koonung Creek and the northern edge of the Elgar Park hockey pitch.
- c) Between the freeway corridor and 690 Elgar Road (east of Elgar Road).



NEL Eastern Freeway Upgrades ULDP Attachment 1, Architecture and Urban Design Part 1, Zone 9 and 10

69. The Jocelyn Avenue pinch point appears to present the narrowest trail cross section along the whole UDLF alignment. The lack of dimensions in the UDLF however make it difficult to review this pinch point. Measuring to scale, from Attachment 2, Drawing 9559, the cross section appears less than 5m between the proposed noise wall and existing retaining wall. The noise wall is measured at 6m in height from the SUP pavement (8m in height from the freeway pavement).

70. This outcome is considered to be incommensurate with UDS Detailed Requirement 9.4 – Interfaces, stating *“The creation of unsafe narrow areas between noise walls and residential properties are avoided and minimised. Innovative solutions are included to ensure any narrow spaces are pleasant and safe”*.



Koonung Creek Trail at rear of Jocelyn Avenue properties.

Measurements and annotations added by Whitehorse City Council to NELP Drawing 9559

71. The noise wall height taken from the scale for the above image (Drawing 9559) is in contrast to UDLP Attachment 1 Drawing 9204 that indicates a 10m noise wall will be in this location. This is another example of how the layout of the UDLP and the lack of clear information has caused confusion.
72. While the existing trail through this segment to the rear of Jocelyn Avenue properties is tighter relative to broader segments of the linear open space network, it remains open to the sky due to the noise walls being offset considerably from property boundaries. The presence of the unchanneled Koonung Creek currently contributes to this openness and amenity to trail users.
73. There appears to be spatial availability between the existing retaining wall and property boundary to widen this segment to enhance user amenity by cutting into the existing retaining wall to a point up to the rear of the Jocelyn Avenue residential property boundaries.
74. Council seeks consideration also be given to flattening the crest of the SUP in this location. The steepness of the existing path provides sightline problems as well as making the ride significantly less enjoyable. Re-grading the path would slow cyclists at the rear of 12 Joceyln Avenue where there is very limited visibility.



Koonung Creek Trail, rear of Jocelyn Avenue properties

75. The UDLP cross sections and plans do not illustrate proposed landscaping along the noise wall to offer screening and enhance user amenity. This is inconsistent with:
- UDS Detailed Requirement 9.1 – Noise and visual mitigation, stating *“Landscaping and landscaped embankments enhance and soften the appearance of walls and barriers, reduce height and bulk, and better integrate the structures into the surrounding area”*;
 - UDS key design requirements 1E: *“Seek to reinstate a planted buffer between the Eastern Freeway and the Koonung Creek Trail to improve amenity for walkers and cyclists”*; and
 - UDS key design requirement 1B: *“Design noise walls to the south of the Eastern Freeway to maximise solar access to residential properties and the Koonung Creek Trail, deter graffiti at lower levels and to have treatments both sides of the wall. Use landscaping to filter views to walls from surrounding dwellings.”*

76. The response provided in the UDLP Report (page 91) states that the landscaping requirements in key design requirement 1B cannot be achieved. Council suggests that by setting back the retaining wall on the south side of the Koonung Creek Trail, there will be sufficient space for planting to enable compliance with UDS requirement 1B.
77. No information is provided regarding which noise wall type is proposed for this location. There are therefore concerns regarding the amenity and perceived safety of this pinch point – which is currently subject to a more open setting with views to the creek (set to be channelled) and architecturally designed noise walls.
78. An appropriate noise wall treatment must be selected for this location that allows daylight and eye level visibility into the freeway, to enhance amenity, sense of openness and perceived safety. Appropriate noise wall types for this location are considered to be those within the UDLP listed as WNW-04, WNW-05, WNW-06 and WNW-07, provided solid segments are only below eye level.
79. Appropriate lighting in this section of the Koonung Creek Trail is critical to address personal safety and meet Objective 7.1 within the UDS to *“reduce the opportunity for crime, maximise passive surveillance and support safe, comfortable and enjoyable places that meet Crime Prevention through Environmental Design (CPTED) principles”*. Further comments regarding lighting are made in later sections of this submission.

Underpasses

80. No works appear earmarked for the Elgar Road pedestrian underpass, in contrast to the proposed new Doncaster Road underpass. The current underpass at Elgar Road is in poor condition and given its importance to providing a safe riding and walking experience along the Koonung Creek Trail, there is an opportunity for an upgrade as part of the NEL project.



Elgar Road underpass

81. An upgrade should comprise ‘crime prevention through environmental design’ (CPTED) and lighting improvements, refurbishments to ground and wall (internal and external walls) materiality (eg, similar to the cladding applied to the Doncaster Road underpass for trail continuity and design language consistency along the trail).

82. As part of Victoria's Big Build projects, there are numerous examples of new and upgraded underpasses done well. There are also numerous good examples and design guidance set out in NELP's own UDS.
83. Underpasses also present good examples for creative outcomes to occur, such as the painting of murals in coordination with the local community or traditional landowner groups (aligning with the UDLP's 'key pillars' such as Connection to Country), and other initiatives including creative lighting.

Lighting

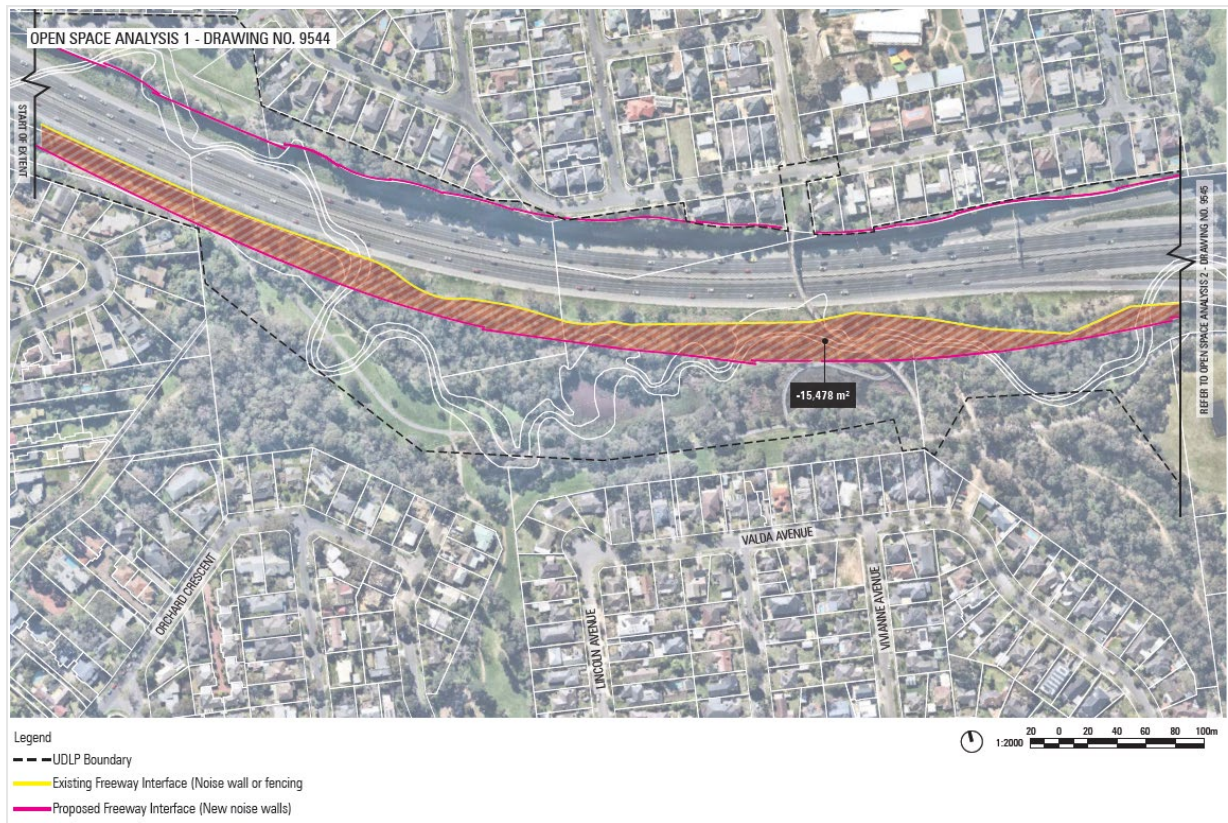
84. Feeling safe is of key importance to people who use SUPs. Appropriate lighting is an element that can contribute to a functional and safe environment. Given Koonung Creek Trail's role as a commuter link, it is important to have adequate lighting in early morning and evening hours – particularly during darker months of the year.
85. Council seeks smart solar on-demand lighting along the Koonung Creek Trail.
86. The UDLP mentions 'borrowed' lighting will be used from the Eastern Freeway for the length of the Koonung Creek Trail, that will produce "*generous levels of night-time illumination*"⁴ and will be supplemented by additional lighting at pinch points.
87. Relying on borrowed light from the Eastern Freeway is not considered appropriate due to:
 - a) Noise walls and vegetation are likely to block the light from the Freeway in many locations within the City of Whitehorse; and
 - b) Lights on the Freeway will be a considerable distance from the SUP at some locations and not provide adequate illumination.
88. EPR LV4 requires CPTED to be a key consideration for the safe movement of pedestrians and cyclists within open spaces and within underpasses. It is considered that this cannot be achieved with borrowed light from the Eastern Freeway and therefore a lighting design that shows solar on-demand lighting along the SUPs and through the underpasses is requested.

⁴ NEL Eastern Freeway Upgrades UDLP Report – Burke Road to Tram Road, page 107

OPEN SPACE IMPACTS

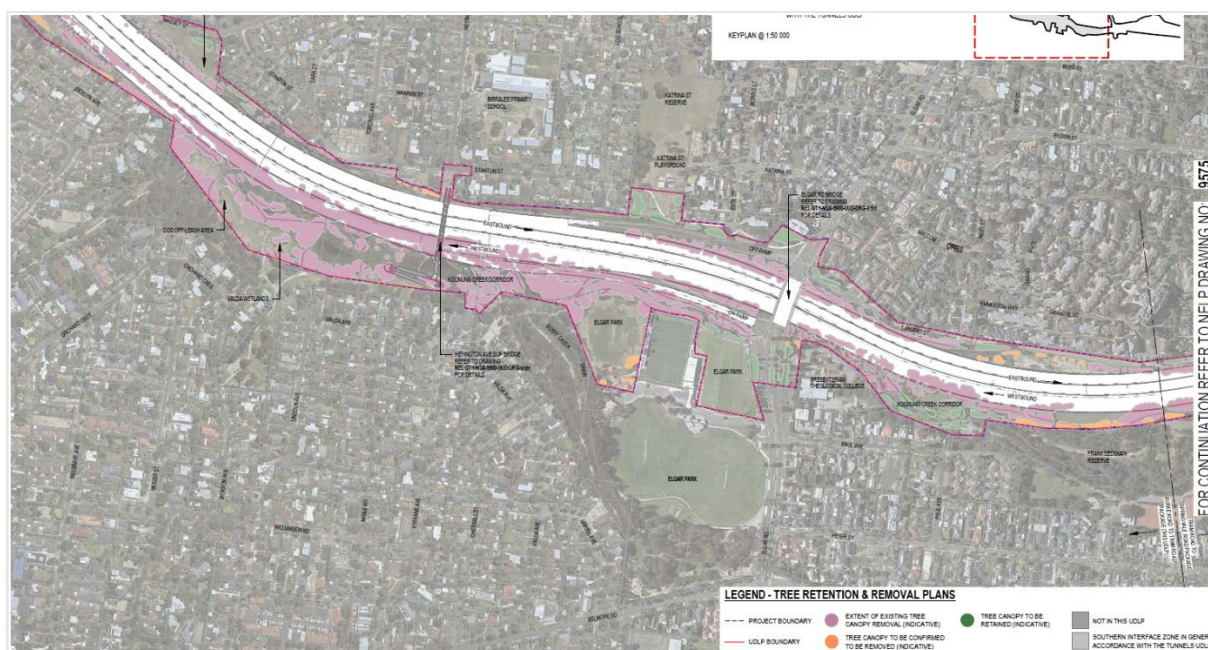
Koonung Creek Parklands

89. Council has measured the encroachment of the freeway south into the open space (based on NELP's Landscape Drawing No. 9544) as approximately 15,000m². This is based on the calculation of land between the existing noise wall or fencing, and proposed noise/flood walls.
90. The following assumptions were made in producing these calculations:
- The 'existing freeway interface' was mapped as existing fencing and/or noise walls – whichever was closer to accessible open space.
 - The 'proposed freeway interface' was mapped as the proposed noise/flood walls illustrated on the landscape plans.
 - The degree of encroachment was measured as the difference between the 'existing freeway interface' and 'proposed freeway interface.'



Encroachment of Eastern Freeway into open space, based on NELP Drawing No. 9544

91. The Tree Retention and Removal Plans for the project extent within Whitehorse illustrate that almost all tree canopy within the project boundary is being removed (pink on the plan below) with only small patches of retention (green).



Eastern Freeway Upgrades Burke Road to Tram Road UDLP - Tree retention and removal plan – Zone C

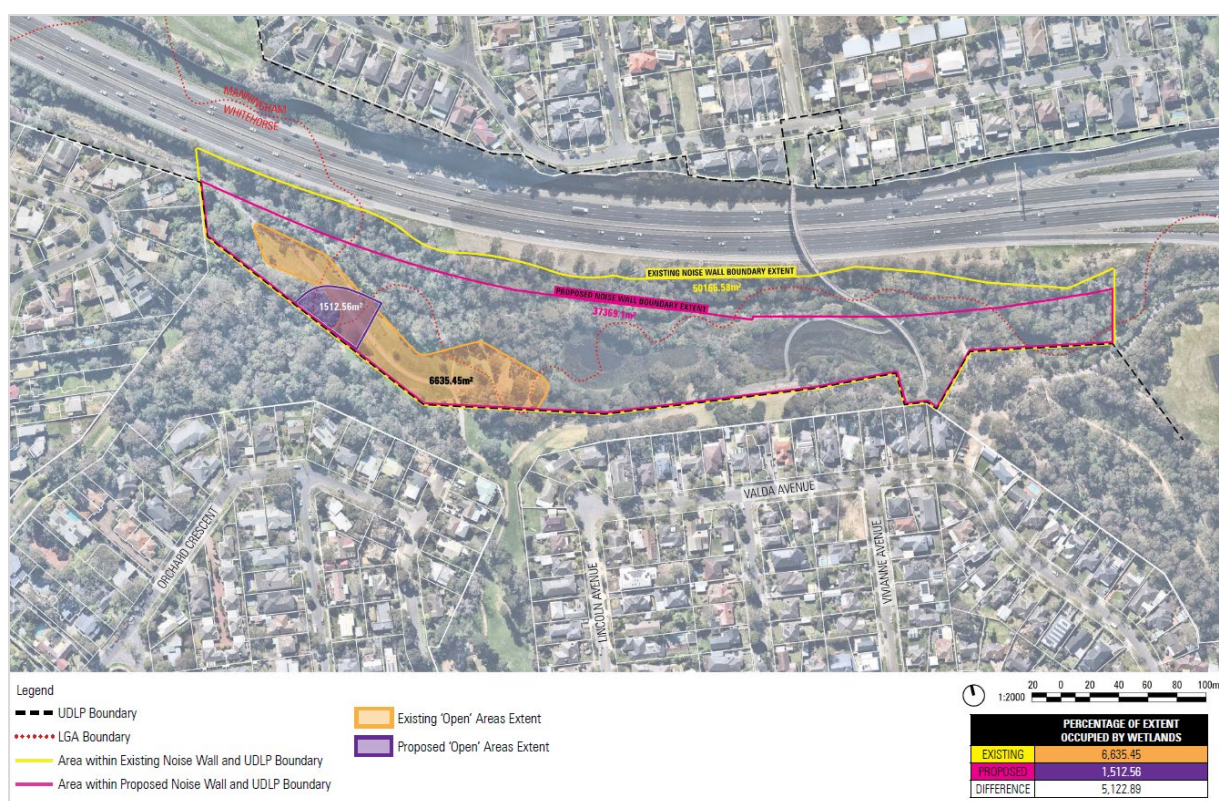
92. The Minister's assessment of environmental effects explained that the expected minimisation of the freeway footprint would result in the avoidance of tree removal in parks and reserves.⁵ Given the minimisation that the Minister intended has not eventuated, the scale of vegetation removal within Whitehorse will have long lasting impacts to the environment, neighbouring homes and significantly diminish the amenity for many thousands of people that enjoy the parklands. Council again calls for the project design to be modified to allow for the retention of trees that will provide shade and amenity until the replacement vegetation is established in the coming decades.
93. Council seeks further details relating to the quantity, species and maturity of vegetation that is proposed to be removed, retained and yet to be confirmed. Indicative information was provided at the EES phase of the project, however it is assumed that there is now a more refined understanding of the vegetation requirements that has enabled the above plan to be generated.
94. The effects of the extensive loss of vegetation from the NEL project is intensified by the concurrent construction of two other Victorian Government 'Big Build' projects within the City of Whitehorse – *Suburban Rail Loop* and *Mont Albert Road Level Crossing Removal*. Combined, it is estimated that approximately 5,000 trees will be removed within the City of Whitehorse as part of these three projects.
95. This is a massive impact on the canopy cover within the municipality and will take many decades to recover. In the meantime, the environment, residents, visitors and wildlife are disadvantaged. Council has set canopy targets within its '*Urban Forest Strategy*' which will be very hard to achieve as a result of the Victorian Government projects.

⁵ North East Link Minister's assessment of environmental effects (2019), page 55-56

96. EPR AR3 states “*Maintain at least a ratio of 2:1 for replacement of amenity plantings*”. In light of the cumulative effect from multiple Victorian Government projects, Council suggests NELP should consider a canopy replacement rate of at least 3:1 within Whitehorse.

Valda Wetlands

97. While encroachment into open space from the widening of the Eastern Freeway has been expected by Council (although not accepted) since the EES phase of the project, Council was surprised by the extent of the impact on Koonung Creek Parklands by other NEL features. Until the UDLP was released, Council was unaware of the extent of the encroachment on usable open space caused by the relocation of the Valda Wetlands and associated WSUD treatments including a sediment pond.
98. The image below shows the difference in area between the existing usable open space (orange) and the proposed usable open space (purple). This represents a decrease of approximately 5,000m².



Difference in usable open space near Valda Wetlands

99. To minimise the encroachment, Council suggests shifting the wetlands east and integrating them under the ramps of the Heyington Avenue Bridge. The space under the ramps is not usable and the wetlands in this area may provide an interesting public realm experience being elevated above it, similar to the current arrangements. The architecture of the bridge could respond in a creative way, regarding how structural components ‘land’ within the wetlands. This concept may need further consideration in terms of maintenance implications.
100. Council perceives that the function of the wetlands has changed from primarily being for the environmental benefit of flora and fauna to that of managing water from the widening of the Eastern Freeway. The community needs to be compensated for the land that is being used to accommodate this change in function. The decreased open space will result in fewer areas for passive recreation and

a reduction in the designated 'dog-off-lead' areas. New open space is requested to be provided for the community on the south side of the Eastern Freeway, to offset these losses.

101. The change in function of the wetlands (discussed in point 100) raises the issue of which authority is best placed to be responsible for the ongoing management of the wetlands and associated infrastructure. Detailed discussions with Council are required about this matter.
102. It is essential for Council to understanding the flood modelling that the wetland design is based upon. NELP is requested to forward this information to Council, including Melbourne Water's response regarding the modelling and waterway management. It is unclear if appropriate rainfall events have been considered for the changed climate, proposed increase in hard infrastructure and decrease in permeable areas.
103. Council seeks information from NELP regarding the estimated stormwater performance treatment of the new wetland as this asset currently contributes to Council's Integrated Water Management Strategy targets. Any re-design should incorporate these considerations as part of its development. For example, removal of pollutants actual TN reduction (kg/yr) and actual flow reduction (ML/yr).
104. Council's concerns regarding the wetlands extend to their lowered plane relative to the SUP and spaces lining its south. Landscape Cross Section 10 illustrates this level change, which will be framed by the southern retaining wall and proposed flood walls to the northern side. This appears to indicate that this space may function more as a large retarding basin than a passive open space. Council requests supporting information that would be helpful in formalising this assessment, including flood modelling to understand impacts to the wetlands and adjoining spaces, paths and residential land during 1 in 10 and 1 in 100 events.
105. Of key urban design and landscape concern is the impact of tree and vegetation removal to the amenity and environmental qualities of the wetlands area. Tree Retention and Removal Plans indicate that all tree canopy within the Valda Wetlands open space area will be removed. The existing presence of layered native vegetation including dense scrub and grasses at the understorey and canopy level trees are key to the wetlands experience and image. The substantial loss presents significant impact to the riparian landscape character which will take many years to re-establish.
106. In replacement, the landscape plans illustrate proposed clumps of tree canopy within 'mixed grass planting' to the southern side of Koonung Creek and 'mixed shrub planting' to its northern side. This high-level illustration lacks in vision regarding recapturing this layered riparian character. A more detailed design is required at this project stage to ensure a sufficient framework for reinstating the valued attributes of the wetlands is delivered. While the grass plantings may be preferred for drainage efficiency, there is risk that the illustrated planting mix of grass and trees will not adequately reinstate the valued, multi-layered and dense riparian planting that exists today.
107. Further to experiential concerns, the proposed wetlands design has diminished the opportunity for people to connect with the wetlands which is currently offered by the existing elevated boardwalk. Pedestrian access is limited to the realigned SUP along its southern edge, which is far more elevated than the wetlands plane.
108. A 'secondary path' illustrated between the wetlands and creek provides a relaxed but related experience, however there is risk that it will be inaccessible in rain events – given that the path is illustrated to be low lying in the cross section relative to the scale of flood walls to the north and the retaining wall to the south. As well as accessibility issues, this raises major maintenance concerns for Council.

109. It is also queried whether the secondary path will be universally accessible for people with limited mobility or pushing strollers. Opportunity to experience the wetlands are also limited to the two 'secondary path' entrances spaced approximately 350m apart. It is recommended in future design processes that a more immersive and accessible experience is provided, including reinstating the element of the wetlands boardwalk at an appropriate level above ground. It is further recommended that it should provide greater permeability between the distant entrance points as currently illustrated.
110. The parklands around the existing wetlands are designated dog-off-lead areas, however dogs are prohibited from entering the wetland areas. As the designs evolve for the new wetlands, consideration is needed for the protection of the new vegetation and the wildlife that will hopefully be attracted back to the wetlands.
111. Evolution of the wetlands proposal should be completed in consultation with First Nations stakeholders, particularly given it is within the Cultural Heritage Sensitivity Area and the overarching Project Pillar of 'Connection to Country' outlined in the UDLP report.

Impacts to non-wetland spaces

112. Key to this existing open space corridor within the project boundary is its variety of open space functions, including the wetland areas and passive open spaces with clearance of dense vegetation to allow informal uses. These flexible spaces have been significantly reduced in footprint by:
 - a) The freeway expansion to the south.
 - b) Reconfiguration of the Valda Wetlands and associated WSUD treatments.
 - c) Large application of 'mixed shrub planting and garden beds.'
113. To the western extent of Valda Wetlands, a culvert is proposed to channel Koonung Creek through the narrow Jocelyn Avenue pinch point. Limited information is provided regarding the alignment of the channelled creek which does not appear in Cross Section 09. It is unclear how deep the culvert and channel will sit relative to ground level. 'Mixed Shrub Planting & Garden Beds' are illustrated atop the culvert box, with proposed canopy trees narrowly offset from its opening. Adequate soil depths will be required to support shrub and tree planting around the culvert box and atop the buried channel. Further detail is requested to understand the image and function of landscaping around culverts.
114. Given the environmental flows associated with the expanded freeway corridor and in context of a changing climate, further information is requested regarding the creek alignment and capacity for the culvert to avoid inundation. This concern relates to potential flooding of the proposed 'dog-off-lead' area between the culvert and eastern extent of the wetlands. If constructed as proposed, this area will be one of the few remaining 'open' locations within the reserve that is unencumbered by WSUD features and wetlands, or not proposed for tree canopy.
115. 'Open' areas that appear to comprise lawn where recreational activities could occur are limited to the small dog-off-lead area to the east of the wetlands. Further west, the segment of linear open space approximately 25-30m wide is narrowed, with the realigned SUP squeezed between existing dense vegetation behind the rear of properties fronting Orchard Crescent and proposed canopy tree clumps and the culvert. Future detailed work must provide a more balanced approach to the encumbered and unencumbered land, to ensure flexible use of open areas is maintained in conjunction with wetland areas.

116. The reduction in the area for dog-off-lead activities will result in a space that does not meet the best practice guidelines for dog-off-lead areas. The constrained size of this space will lend itself to creating conflicts between users due to competing needs, such as those looking for an area to host a casual picnic on the open lawn area with those looking to exercise their dog. This area is poorly thought-out and tokenistic.
117. Given the dramatic changes to the layout and function of the Koonung Creek Parklands, Council recommends that NELP offer private property owners the option to have their adjoining fences reviewed. The review would identify if the height and material etc are appropriate given the activities in the adjacent open space may be much closer to the properties and vegetation will be absent or immature for many years. If fencing alterations are deemed necessary to address issues such as noise and overlooking, NELP is requested to fund the upgrades.

Heyington Avenue Pedestrian Overpass

118. The proposed replacement bridge has positive attributes such as a high degree of visual access and passive surveillance. The proposed tensile mesh screening will provide a good degree of passive surveillance, minimise graffiti and present a light weight barrier treatment than minimises visual bulk.
119. The UDLP report states that the bridge design is inspired by the surrounding landscape. Visualisations and elevations present positive attributes as described above, but also illustrates concrete as a predominant materiality choice. Relative to the existing bridge comprising a timber-centric palette which complements the riparian setting, there is opportunity to better reference the landscape character of the wetlands – using similar tones, colours and materials as those prescribed in the noise wall typologies for this section of the project corridor.
120. It is recommended that the design language adopts a ‘lighter’ touching approach with clearer reference to the riparian wetland character of the local setting through materiality, colour and texture. This key structural element positioned with the open space presents an opportunity for the ‘Connection to Country’ project pillar to be clearly reflected in the design outcome, and closer alignment to UDS Detailed Requirement 14.1 – Walking & Cycling Bridge Design – *“Walking and cycling bridges use structural form, materials, texture and colour to create an identity for the project. Bridges respond to the surrounding context and are sensitive to the local character of the area.”* Benchmark examples include the Deakin University pedestrian bridge, comprising materiality and structural elements that make clear reference to the adjoining native treetops. This benchmark is used within the UDS pedestrian bridge section.
121. Structurally, the design language of the existing bridge seems to have been switched with the Estelle Street Bridge where tall cable-stayed bridge is proposed. The existing cable bridge is visually iconic and serves as a key wayfinding marker in the local setting. It is proposed to be replaced with a more subtle outcome within Whitehorse.
122. The composition and alignment of the southern ramping presents an increased journey distance relative to the existing that is integrated with the curved bridge alignment. To walk up the kick-back ramp is an approximately 150m long journey which may deter people with mobility issues. It is acknowledged that other options may be limited due to the spatial constraints of the widened freeway corridor. Opportunity to increase pedestrian permeability from the ramp and integration with the wetlands includes providing an additional stair entrance at the western turn of the ramping system to provide an alternative access point to the secondary path.

123. Spaces beneath ramping may be perceived as undesirable with potential CPTED concerns.
124. Investigation is recommended to see if the Valda Wetlands can be realigned to integrate with the bridge ramping (as per section 99 in this submission).
125. If this is not achievable, there is an opportunity for the underside and/or base of the bridge ramping to be integrated with the broader open space, such as integrating active recreational facilities beneath or attached to structural components. This will likely increase activity around and beneath them to minimise awkward, unused spaces beneath elevated infrastructure. This would be consistent with other Big Build projects, as well as the achieving the following NEL UDS Detailed Requirements:
- 7.1: *“Opportunities to create additional functional and high quality open space within the project corridor are maximised”*; and
- 7.2: *“Opportunities to upgrade the existing open spaces along the project corridor are maximised to create consistent, high quality, multifunctional and efficient spaces”*.
126. Feature lighting in these spaces is an important consideration to provide visual interest and enhanced safety in evening hours as per UDS Detailed Requirement 14.3 – Safety – *“Bridges provide a high level of passive surveillance and perception of safety”* and 14.7 – Lighting – *“Lighting is integrated into the (bridge) design to make the crossing attractive and appropriate for night time use.”* There is generally a lack of information regarding lighting provided in the UDLP for an assessment to be made.

Elgar Park

127. The southern encroachment of the freeway at Elgar Park’s northern interface is generally of less impact than near Valda Wetlands. Additional traffic lanes at this location are mostly confined within the freeway corridor and absorb space currently serving as landscaped embankments.



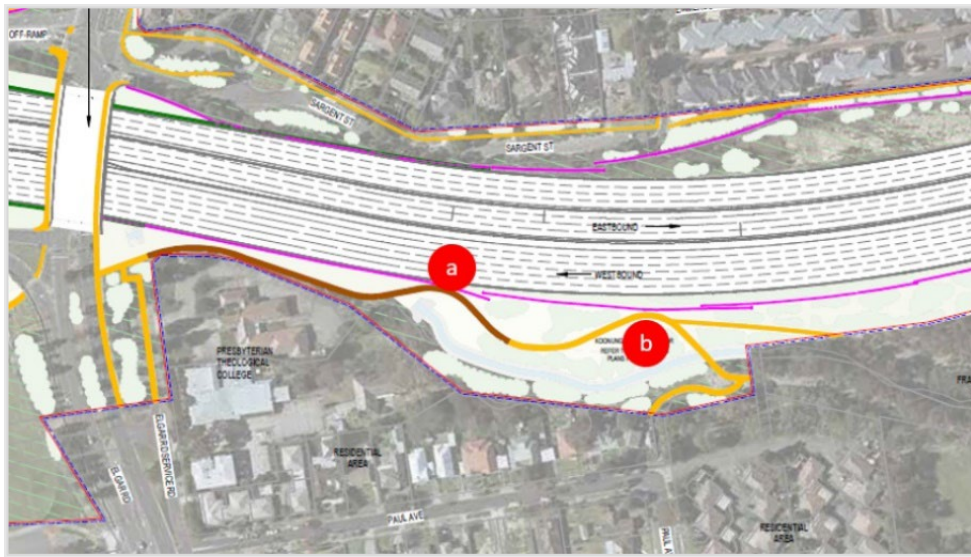
Encroachment of Eastern Freeway into open space, based on NELP Drawing No. 9545

128. Impacts to Elgar Park appear limited to its northern edge, including matters discussed above regarding the piecemeal approach to SUP provision and integration.
129. Given the tightness of the space between recreational fields and proposed noise walls, it is important that noise walls are appropriately selected to maximise openness and daylight to the SUP, paths and adjoining sporting fields. As previously stated, this information is not provided and an assessment cannot be made.
130. Tree Retention and Removal Plans indicate that all tree canopy within the north western portion of Elgar Park (within the project boundary) will be removed. The existing dense, riparian tree canopy is key to forming the backdrop of Elgar Park and the character around the Bushy Creek Drain and adjacent walking tracks. Impacts are therefore significant, with not enough detail provided in the UDLP regarding reinstatement of this landscape character.
131. Given the planned removal of vegetation in the area north of the Elgar Park hockey pitch, there is an opportunity to realign the SUP to fix the existing 'pinch point' (see map in section 68 of this submission).
132. Similar to comments relating to the Valda Wetlands, the channelled alignment of the underground Koonung Creek along the northern edge of Elgar Park is unclear in the provided documentation. Again, 'Garden Beds' are illustrated atop the culvert box, with proposed canopy trees narrowly offset from its opening. Adequate soil depths will be required to support shrub and tree planting around the culvert box and atop the buried channel. Further detail is needed to understand the image and function of landscaping around culverts.
133. NELP's proposed works within the Elgar Park North West oval during the construction phase provide an opportunity to reinstate the oval with an expanded playing surface. NELP is requested to plan (in consultation with Council) and reinstate the oval to enable greater use of this important active recreation space. This would be well appreciated by the hundreds of sports players who use this space each weekend.

East of Elgar Road

134. Immediately east of Elgar Road, a narrow pinch point is identified to the northern edge of the private property at 690 Elgar Road. Similar to the Joceyln Avenue pinch point, the area is currently afforded openness due to the open creek alignment. The creek and its landscape characteristics currently contribute to the character and amenity of this segment of the trail. Loss of this amenity is a key concern here given that a limited landscape response has been illustrated in the UDLP (with only 'Mixed Shrub Planting and Garden Beds' illustrated between the property boundary and noise wall). In lieu of proposed tree planting, the noise walls are likely to be imposing at this location presenting to both the SUP and private property. A more refined landscape response at this location is recommended.
135. Consideration to undergrounding the power utilities at this location and throughout the alignment will increase the amount of space available for landscaping, the SUP and open space.
136. Similar culvert queries discussed above also exist at this location regarding the alignment of the underground channel, feasibility of landscape atop the culvert pending soil depth queries, and potential flooding concerns of the trail.

137. There are two opportunities to realign the SUP between Elgar Road and Frank Sedgman Reserve so that the path is not immediately adjacent to the relocated noise walls:

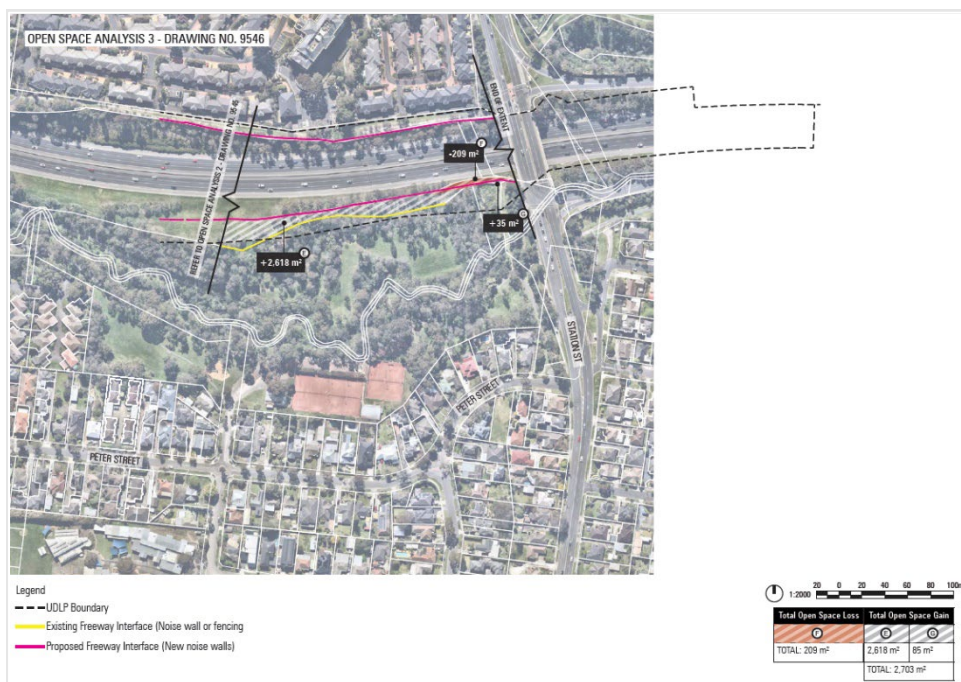


Opportunities to realign SUP, east of Elgar Road

- Relocate culvert to the east or south so that the SUP can be realigned to the south and would not abut the new noise wall location.
- Realign the SUP so that it is not abutting the relocated noise wall.

Frank Sedgman Reserve

138. The southern encroachment of the freeway at Frank Sedgman Reserve is limited to land to the north of the creek alignment as illustrated below.



Encroachment of Eastern Freeway into open space, based on NELP Drawing No. 9546

139. Vegetation impacts are also limited to land between the freeway interface and creek. Their interim loss prior to the establishment of replacement plantings is likely to be at least partially screened by the dense vegetation and canopy lining the creek corridor.
140. The UDS has the following Detailed Requirements:
- 7.1: *"..... Opportunities to create additional functional and high quality open space within the project corridor are maximised. The open space function of the open spaces within and along the project corridor is maintained. Encroachment and impacts on adjacent open space by freeway infrastructure and roadside landscaping (planting within the road reserve) is minimised"; and*
- 7.2: *"Opportunities to upgrade the existing open spaces along the project corridor are maximised to create consistent, high quality, multifunctional and efficient spaces. This includes public open space infrastructure to enhance the function and enjoyment of the open space, such as seating, natural shade, drinking fountains, dog drinking bowls, emergency markers, bicycle leaning rails/hoops and rest areas".*
141. Council's view is that the UDLP has not demonstrated that the above requirements have been achieved within the City of Whitehorse. Frank Sedgman Reserve presents as an appropriate opportunity for open space upgrades and enables the Victorian Government to acknowledge the adverse impacts of the NEL project and contribute to addressing them.
142. Environmental Performance Requirement (EPR) LP5 states *"where public open space is to be temporarily lost during construction, residual public open space should be enhanced where practical to minimise and mitigate land use impacts"*.
143. The Ministerial assessment explains further about EPR LP5 (page 43) that:
- "residual open space should be enhanced through the provision of playgrounds, paths and plantings, for example, before adjacent open space is occupied and becomes unavailable.....This will be particularly important for residual areas of parkland along Koonung Creek where large areas of existing parklands are expected to be unavailable during construction."*
144. Neither the UDLP, or any other document available to Council, has information about where and how the residual open spaces within Whitehorse will be enhanced. Council suggests that Frank Sedgman Reserve is ideal for contributing to the requirements of EPR LP5, the intent expressed in the Ministerial assessment of environmental effects, and the UDS Detailed Requirements. Other locations will also need to be identified to mitigate the full impact within the City of Whitehorse.
145. Council is seeking upgrades to accessibility, function and amenity at Frank Sedgman Reserve, including (but not limited to):
- a) Upgrades to the existing SUP and secondary paths.
 - b) Enhanced access across Koonung Creek to improve usability of open space on the north side of the creek
 - c) Upgrades to active and passive open space facilities south of the creek (excluding the playspace which is funded separately)
 - d) Formalise the gravel car park near the tennis club to expand open space at the eastern end

Areas adjacent to Koonung Creek

146. Information is requested from NELP regarding how the areas immediately adjacent to the Koonung Creek will be designed with safety in mind. For example, identify if fencing is required.

NOISE AND AIR QUALITY

147. Members of the Whitehorse community have demonstrated extremely strong concerns regarding noise and air quality.
148. The data presented as part of the EES phase of the project shows significant increases in volumes of vehicle traffic within the City of Whitehorse as a result of NEL, compared to other municipalities that will see reductions. This includes the Eastern Freeway, arterial roads and connections to local roads.
149. The design of the Eastern Freeway (ie the widening) as presented in the UDLP has a direct link to the expected increase in vehicles, which in turn results in the community concern regarding air quality and noise, both inside and outside the project boundary.
150. The UDLP reveals no information that consideration has been given to structures or landscaping being required outside the project boundary, that are a direct result of the project.
151. Information is sought from the Victorian Government regarding how noise and air quality matters will be mitigated during operation (as well as during construction) in the immediate and long term. Landscaping and noise attenuation features along arterial roads, within open spaces and private properties may need to be proposed.
152. There are members of the Whitehorse community who feel that their concerns have been dismissed by various Victorian Government authorities and Council asks for NELP to transparently work with residents to address current and future environmental and health impacts of the project.

CONCLUSION

153. Whitehorse City Council is not able to support the UDLP in its current form.
154. Council considers that the UDLP has not demonstrated that the adverse impacts of the widening of the Eastern Freeway within the City of Whitehorse have been mitigated.
155. The matters Council calls upon the Victorian Government to address include (but are not limited to):
 - a) Reduce the width of the Eastern Freeway widening.
 - b) Provide a cohesive and well integrated design that the Whitehorse community can be proud of for years to come.
 - c) Tangibly demonstrate that the noise, air quality and other environmental concerns of the community have been addressed, inside and outside the NEL project boundary.
 - d) Provide additional information to Council to enable the UDLP to be assessed in further detail, eg flood modelling.
 - e) Provide new open space (including dog-off-lead areas) south of the Eastern Freeway.
 - f) Increase the tree canopy replacement rate to 3 trees for every tree removed within Whitehorse.
 - g) Upgrade the full length of the Koonung Creek Trail, not just the sections impacted by NEL works, including path resurfacing; installing solar lighting, new seats, shelters, public fitness equipment, bike repair stations and wayfinding signage; addressing the pinch points; and upgrading the Elgar Road underpass.
 - h) Construct an elevated all seasons boardwalk at Valda Wetlands that is accessible for all abilities.
 - i) Enhance existing open spaces at Elgar Park North West and Frank Sedgman Reserve.

CONTACT DETAILS FOR FURTHER INFORMATION

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