

s22(1)(a)(ii) - irrelevant material

OFFICIAL

**From:** Bernie O'Kane <s47F - personal privacy>  
**Sent:** Saturday, 30 July 2022 10:59 AM  
**To:** Minister.King.MO <[Minister.King@mo.infrastructure.gov.au](mailto:Minister.King@mo.infrastructure.gov.au)>  
**Subject:** Melbourne's Suburban Rail Loop

Dear Minister King,

I enclose for your consideration a link to an essay I have written regarding the SRL.

<https://bernie-okane.medium.com/melbournes-suburban-rail-loop-and-housing-affordability-91e76f41a7ee>

The issue I am raising is the claim in the Business and Investment Case that the SRL will bring young families and essential workers back to the established and better connected suburbs from the urban fringe. There is no evidence to support this and the SRL is likely to have the opposite impact.

I am not opposing the SRL but rather arguing that additional measures are needed to ensure the claimed affordable higher density housing is actually achieved.

Please note I am a member of the Labor Party.

Yours sincerely,

Bernie O'Kane  
s47F - personal privacy



Dr Matthew Bach MP  
Shadow Minister for Transport Infrastructure

1 June 2022

Dear Ms King,

My heartiest congratulations on your impending appointment to the Cabinet in the very important role of Minister for Infrastructure. You have my best wishes for much success.

I wanted to write, at my earliest opportunity, both to congratulate you and - perhaps even more importantly - to return the hand of bipartisanship that you have already been good enough to extend to the Coalition in Victoria.

For far too long infrastructure investment in Victoria has been subject to politicised processes and partisan bickering. Instead of seeking common ground with the previous Federal Government, Daniel Andrews endlessly engaged in blame, picking fights for political advantage.

Victorians have been the losers. Every single major project of the Andrews Labor Government is billions of dollars over budget, with blowouts now totalling over \$28bn. Most projects, in addition, are years late. Poor initial processes, planning and scoping are - according to Victoria's Auditor General - key reasons for these egregious failures, as is a stubborn and arrogant refusal to work with Commonwealth partners.

In this context your recent proactive comments, confirming your willingness to work with a Victorian Coalition Government - should we be successful at the upcoming State election in November - were much appreciated. Please be assured that we, also, are keen to work productively and cooperatively with you.

In that spirit, and noting your further comments about your willingness to be guided by the states on infrastructure investment, I am eager to confirm for you the Victorian Coalition's commitment to build the East West Link. This is a vital piece of road infrastructure, which - according to Infrastructure Australia - is a "high priority". So, I was pleased to hear that you will continue to set aside \$4bn for the East West Link, budgeted for by the previous Federal Government. Yet I would respectfully seek your views about further support. As you know, the previous Federal Government committed to fully fund the necessary government contribution towards the East West Link. Given the national importance of this piece of infrastructure I would hope that you would not pull this further promised funding from Victoria.

There is also now an understandable lack of clarity about the status of numerous other projects that the Morrison Government had committed to, including the Beveridge Interstate Freight Terminal. I would welcome the opportunity to meet with you soon to discuss your Government's views on this significant investment in Victoria's freight network.

Finally, I wanted to provide my support for your recent comments regarding the Suburban Rail Loop (SRL). In addition to your pledge of \$2.2bn for this project, it is set to cost Victorian taxpayers in excess of \$120bn. Yet the SRL is not funded or costed. There is no business case or environmental effects statement for the entirety of the project, which is not recommended by Infrastructure Australia. Hence, I agree entirely with you that further commitments to this project should only be made when additional information is available to demonstrate that it "stacks up" - to use your apt expression.

Many congratulations, once again, on the announcement of your elevation to the Ministry. I very much look forward to a long and productive association.

With warm regards,

A handwritten signature in black ink, appearing to read "Matthew Bach".



## The Hon Catherine King MP

Minister for Infrastructure, Transport, Regional Development and Local Government  
Member for Ballarat

Ref: MC22-003569

Dr Matthew Bach MP  
Member for Eastern Metropolitan Region  
Parliament of Victoria  
Office 1 10-12 Blackburn Road  
BLACKBURN VIC 3130

via: [matthew.bach@parliament.vic.gov.au](mailto:matthew.bach@parliament.vic.gov.au)

Dear Dr Bach

Thank you for your kind letter of 1 June 2022 offering congratulations on my appointment as the Minister for Infrastructure, Transport, Regional Development and Local Government, and highlighting the importance of Australian and Victorian government collaboration on infrastructure projects, such as the the East West Link, the Beveridge Interstate Freight Terminal and the Suburban Rail Loop.

It is an incredible honour and privilege to have the opportunity to serve our nation and I am very pleased to have been appointed to this key portfolio which gives me the opportunity to help build a better future for Australians in every corner of the country – from the cities and the suburbs to the regions and remote Australia.

The Australian Government will go through the infrastructure investment program line by line to identify the projects that will deliver the greatest benefits to communities across the country. As part of this process, and noting the Victorian Government does not support the East West Link project, I recently announced the Government will not commit funding towards this project. This will result in the removal of the \$4 billion contingent liability.

Thank you for your good wishes and taking the time to write to me on this matter.

Yours sincerely

A handwritten signature in blue ink, appearing to be 'Catherine King'.

Catherine King MP

11 / 7/2022

PO Box 6022 Parliament House, Canberra ACT 2600 | Tel: (02) 6277 7520

s22(1)(a)(ii) - irrelevant material

**From:** s47F - personal privacy (VICMIN) <s47F - personal privacy@minstaff.vic.gov.au>

**Sent:** Thursday, June 2, 2022 1:16:16 PM

**To:** s47F - personal privacy (C. King, MP) <s47F - personal privacy@aph.gov.au>

**Cc:** s47F - personal privacy (VICMIN) <s47F - personal privacy@minstaff.vic.gov.au>

**Subject:** Letter from Minister Allan to Minister King 2 June 2022

Hi s47F - personal privacy

Letter as discussed briefly yesterday.

Have also included s47F - personal privacy in this email who looks after Minister Allan's diary and the office more generally. Please pass her details on to your equivalent person once they are appointed!

Talk soon



s47F - personal privacy

**Chief of Staff**

**Office of the Hon Jacinta Allan MP  
Minister for Transport Infrastructure  
Minister for Suburban Rail Loop**

Level 20, 1 Spring Street, Melbourne VIC 3000

s47F - personal privacy [@minstaff.vic.gov.au](mailto:@minstaff.vic.gov.au)



## Hon Jacinta Allan MP

Minister for Transport Infrastructure  
Minister for the Suburban Rail Loop

1 Spring Street  
Melbourne Victoria 3000  
Telephone: 03 8392 6100  
DX210292

Hon Catherine King MP  
Minister for Infrastructure, Transport,  
Regional Development and Local Government  
PO Box 6022  
Parliament House  
CANBERRA ACT 2600

02 / 06 / 2022

Dear Minister

Congratulations on your appointment as the Minister for Infrastructure, Transport, Regional Development and Local Government as part of the new Albanese Commonwealth Labor Government.

My portfolio colleagues and I look forward to working with you to progress infrastructure investment and transport policy reform in Victoria to support sustainable development, build a stronger and more productive economy, connect communities and create new jobs.

The Andrews Labor Government welcomes the Commonwealth's commitment to nationally significant projects, such as the Suburban Rail Loop. I look forward to discussing with you how this project and your other election commitments can be progressed so as to create an enhanced transport network for Victoria.

As you are aware, a key priority for the Victorian Government is the development of new intermodal terminal in Melbourne's west with an optimal network configuration that best delivers on the funding provisions made in recent Federal Budgets. We also welcome participation in the proposed review of the Inland Rail project, and the national review of the rail freight sector included in the 2021 Labor Policy Platform. We also look forward to working with you on our existing shared projects of Melbourne Airport Rail and Geelong Fast Rail, as we progress these important projects from planning to delivery.

Victoria welcomes the transport election policy commitments made by the Albanese Labor Government, including a plan for local rail manufacturing, and greater uptake of electric and hydrogen vehicles. These commitments align with the Victorian Government's efforts to drive innovation and reform in how transport services and infrastructure are planned and delivered.

Alongside budget investments, I believe there is an excellent opportunity for a collaborative approach between the Commonwealth, Victoria and other jurisdictions to develop a shared reform agenda that best leverages our joint investment.

This could include improvements to approval and procurement processes for projects that would help reduce cost pressures, address capacity constraints in the infrastructure market and drive higher levels of local content and workforce development.

The Victorian Government is also committed to working with you on an enhanced infrastructure pipeline in the coming months that could inform the Federal Budget proposed for October 2022.

## s47B - Commonwealth-State relations

I look forward to meeting with you at your earliest convenience and I have asked my office to work with your office to organise a suitable time for this to occur.

Yours sincerely



**Hon Jacinta Allan MP**  
Member for Bendigo East  
Minister for Transport Infrastructure  
Minister for the Suburban Rail Loop

cc: The Hon Ben Carroll MP, Minister for Roads and Road Safety, Minister for Public Transport  
The Hon Melissa Horne MP, Minister for Ports and Freight



## The Hon Catherine King MP

Minister for Infrastructure, Transport, Regional Development and Local Government  
Member for Ballarat

Ref: MC22-003615

The Hon Jacinta Allan MP  
Deputy Premier of Victoria  
Minister for Transport Infrastructure  
Minister for the Suburban Rail Loop  
Member for Bendigo East  
1 Spring Street  
MELBOURNE VIC 3000

Dear Deputy Premier *Jacinta,*

Thank you for your kind letter of 2 June 2022 offering congratulations on my appointment as the Minister for Infrastructure, Transport, Regional Development and Local Government, and highlighting the Victorian Government's infrastructure priorities and principles your office has proposed to improve the partnership between the Commonwealth and the Victorian Government on infrastructure matters.

It is an incredible honour and privilege to have the opportunity to serve our nation and I am very pleased to have been appointed to this key portfolio which gives me the opportunity to help build a better future for Australians in every corner of the country – from the cities and the suburbs to the regions and remote Australia. May I also congratulate you again on your recent appointment as Deputy Premier of Victoria.

As you are aware, the Australian Government recognises the importance of investing in infrastructure projects that not only supports Victoria's growing cities and regions, but are also underpinned by the merits of strong supporting evidence. This Government is determined to work closely with states and territories to improve and align the infrastructure pipeline to focus on delivering the projects that matter most to them. It was a pleasure to meet with you recently to discuss the Victorian Government's priorities in person.

I recognise the importance of delivering an intermodal terminals solution for Melbourne, noting this will assist in realising the full benefits of the Australian Government's investment in Inland Rail, and continue to support Victoria as the nation's largest generator of inter-capital rail freight and largest exporter of agricultural commodities. The terminals solution will be a key generator of jobs in Victoria, assist in reducing congestion on busy metropolitan arterial roads and support modal shift to rail, which will assist in reducing greenhouse gas emissions – supporting net zero targets.

I am receiving briefings from my department on key infrastructure matters, and departmental officials will continue to liaise with their counterparts at the Victorian Department of Transport on nationally significant projects, including delivering on our commitment to the Suburban Rail Loop.

Thank you for your good wishes and I look forward to working together to deliver infrastructure priorities in Victoria.

Yours sincerely



Catherine King MP

18 / 7 / 2022

s22(1)(a)(ii) - irrelevant material

**From:** s47F - personal privacy  
**Sent:** Monday, 6 June 2022 5:36 PM  
**To:** King, Catherine (MP)  
**Subject:** Construction Labour Shortage

Dear Catherine

After hearing on the news the state government are starting another major infrastructure project, which is nonetheless great for the state of Victoria and I am all for it.

Has thought been taken into consideration that having both the West Gate Tunnel and Suburban Rail Loop and other railway projects all in one hit, may take many skilled workers away from residential projects and construction industry in general. Currently have 16 units awaiting to be constructed, no carpenters to install the frames. Many opting to go work on major projects for more money and less stress (not really working that hard). It may be a waste of productivity, who us and maybe your children may be paying for in taxes for a very long time after you are gone.

All us Victorian's ask that you stagger out these projects. If you really care about labour force and the people. Something needs to change otherwise a lot more builders will start going broke, big and small. Something has got to give. Soon.

**Regards,**

s47F - personal privacy

**VV Construction Pty Ltd**

**112-114 Mitchell St**

**MAIDSTONE VIC 3012**

**T: 03 7002** s47F - personal

**F: 03 9318 4368**

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s22(1)(a)(ii) - irrelevant material

**From:** s47F - personal privacy  
**Sent:** Monday, 13 June 2022 2:55 PM  
**To:** King, Catherine (MP)  
**Cc:** s47F - personal privacy  
**Subject:** Letter from the Vice-Chancellor, Monash University

Dear Minister

Please find attached letter from Professor Margaret Gardner AC

Regards

s47F - personal privacy

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s47F - personal privacy

Executive Assistant to Professor Margaret Gardner AC

**President and Vice-Chancellor**  
Monash University  
Chancellery  
Clayton VIC 3800  
Australia

s47F - personal privacy

E: s47F - personal privacy  
[@monash.edu](mailto:s47F - personal privacy@monash.edu)  
[monash.edu](http://monash.edu)

CRICOS Provider 00008C/ 01857J

10 June 2022

The Hon Catherine King MP  
Minister for Infrastructure, Transport, Regional Development and  
Local Government  
PO Box 6022  
Parliament House  
Canberra ACT 2600

Delivered via email: [Catherine.King.MP@aph.gov.au](mailto:Catherine.King.MP@aph.gov.au)

Dear Minister,

On behalf of Monash University, congratulations on your appointment as the Minister for Infrastructure, Transport, Regional Development and Local Government and your re-election as the Member for Ballarat.

Monash has become a leading modern, global, research-intensive University, delivering education and research excellence in Australia and across the Indo-Pacific.

Our Strategic Plan, *Impact 2030*, charts the path to realise our purpose which is through research and education to address the challenges of the age – climate change, geopolitical security and thriving communities – for the betterment of our society. These challenges are significant for us all and global in their scale and implications. Monash seeks collaborations with universities, governments and industry to create lasting global change, and through innovation and enterprise to advance new ideas and translate exciting technologies.

Translating research and evidence into policy insight also remains a focus. In 2018, Monash University established the Monash Commission to lead a series of independent inquiries on priority issues that present major challenges at a national or global level.

In mid-2022, the second inquiry of the Monash Commission will publish its final report – *'The liveable metropolis: the opportunity of intermediary cities to deliver resilience, impact and prosperity'*. Chaired by Mark Birrell AM, Chairman of the Australia Post Superannuation Scheme and Non-Executive Director of Transurban, a new panel of national and international experts have undertaken a macro perspective on 'Intermediary Cities', which aims to identify catalysts that have accelerated regions to become polycentric. In addition to infrastructure, technology and transport system requirements, the report considers the human implications and imperatives of sustainability, equity, wellbeing and experimentation.

As you know, Monash University has for decades strongly advocated for better public transport connections between its campuses and throughout the broader South East Economic Corridor. I was pleased to host you at our Clayton campus for the announcement of the Albanese Government commitment to advance the business case for Caulfield to Rowville Trackless Rapid Transit (TRT). Furthermore, Monash welcomes the \$2.2 billion commitment towards the Suburban Rail Loop, which will have a dedicated Monash Station.

**Professor Margaret Gardner AC**  
President and Vice-Chancellor  
Chancellery, 27 Chancellors Walk, Clayton Campus  
Monash University, VIC 3800, Australia

s47F - personal privacy

monash.edu

CRICOS Provider 00008C  
ABN 12 377 614 012



The \$1.4 billion TRT proposal will improve access to jobs and services by providing a cost-effective transport link between Caulfield and Rowville and could be operational by 2025. It will also connect people accessing the specialist services at the Victorian Heart Hospital, including regional and suburban patients. A comparable light rail solution would cost approximately \$2.9 billion and require an additional two years to complete.

Given the Suburban Rail Loop is a longer-term project and by 2031 delays on the Monash Freeway and Princes Highway will increase by 87 per cent, it is critical that this project continues to be prioritised. We look forward to working with your Government on this business case and hope the \$475 million set aside by the former Federal Government in 2018 for 'Monash Rail' can be unlocked to make it a reality.

I would welcome the opportunity to meet with you to discuss these and any other matters of your interest at your convenience, and to host you on campus to see first-hand the ground-breaking work of the Monash University Accident and Research Centre.

If advisers in your office would like assistance accessing Monash University's policy or research expertise, I invite them to contact [s47F - personal privacy](#), Director of Precincts and Government on 03 9905 [s47F - perso](#) or [s47F - personal privacy@monash.edu](mailto:s47F - personal privacy@monash.edu)

Once again, congratulations on your ministerial appointments and I look forward to seeing you again soon.

Yours sincerely,

A handwritten signature in black ink that reads 'Margaret Gardner'.

**Professor Margaret Gardner AC**  
President and Vice-Chancellor

**Professor Margaret Gardner AC**  
President and Vice-Chancellor  
Chancellery, 27 Chancellors Walk, Clayton Campus  
Monash University, VIC 3800, Australia

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[monash.edu](http://monash.edu)

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ABN 12 377 614 012

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June 16, 2022

The Honourable Catherine King, M.P.  
Minister for Infrastructure, Transport, Regional Development and Local Government  
P.O. Box 6022  
House of Representatives  
Parliament House  
Canberra  
**ACT 2600**

Email: Email: [Minister.King@mo.infrastructure.gov.au](mailto:Minister.King@mo.infrastructure.gov.au)

Dear Minister,

### **Commonwealth funding of North East Link**

I write to you on behalf of the Stop North East Link Alliance. The Alliance opposes the North East Link Project (NELP) which in our view is a sub-optimal transport project with major adverse consequences. Far more beneficial and lower cost solutions are available to effectively acquit the transport task in the area which the project is purported to serve. NELP would in particular compel greater car dependency at a time when sustainable transport modes should be preferred. Such dependency, significantly elevates costs for individual households, and, foreseeably, greater consumption of fossil fuels. The project would also have substantial adverse collateral effects, including for land use, urban amenity, the environment and human health.

As you will know, the NELP is on Infrastructure Australia's priority list. In fact, NELP was assessed in October 2018 by Infrastructure Australia as a high priority project, with a positive benefit-cost ratio of 1.3 and a Net Present Value of \$2,187 million.

Whether or not this assessment was then valid, the Stop North East Link Alliance submits that significantly changed circumstances since 2018 should lead the Commonwealth to reassess any commitment it has to the project. We set out below for your consideration what we believe to be some of the more significant questions about the viability of the project, and which should inform current and future government decisions.

*Poor public transport in the project corridor*

Firstly, the NELP proposal was developed in the absence of any comparative analysis of public transport solutions. Quite detailed reviews were undertaken by the Victorian Government of route bus services in Melbourne up until about 2008 but proposals in the project corridor that would have resulted in significant mode shift to public transport were never implemented under the *Meeting Our Transport Challenges* strategy which was released in 2006.

It was only in 2021, that the Victorian Government announced a sequel, *Victoria's Bus Plan*. However, at \$109 million, the proposed outlays foreshadowed through the plan are paltry, especially in comparison with the scale of funding proposed for the NELP and other roads projects.

As a consequence, there are serious questions which should be asked of the Victorian Government by the Commonwealth concerning its relative indifference towards potentially much less expensive and more effective public transport solutions in the corridor.

*Transport behaviour and the COVID pandemic*

Secondly, the impact on transport behaviour of the COVID pandemic should now be considered.

Expert evidence tendered in August 2019 on behalf of the Manningham, Whitehorse, Banyule and Boroondara Councils to the North East Link Project Inquiry and Advisory Committee indicated that even before the onset of the pandemic that the traffic volumes predicted by the North East Link Project were inflated.

We now see that commuter trips by office workers, in particular, have declined as a consequence of the pandemic. Whilst there has been some recovery, it would not be unreasonable to conclude that there may be a permanent change in behaviour which would see a reduction in longer commuter trips as workers work from home or at locations closer to home. This is of particular relevance for the NELP which, it had been anticipated, would carry a substantial number of longer commuter trips. These included trips destined for the Melbourne CBD, which has been particularly affected by changes in travel behaviour since the pandemic.

As a result, the major underlying concept of Melbourne 2030, of a polycentric Greater Melbourne has been given impetus, but not quite in the way imagined when the policy was released by the Victorian Government in 2002.

*Suburban Rail Loop and duplicative infrastructure*

The third concern is related to the Victorian government's Suburban Rail Loop project (SRL). This project was announced by the Victorian Government on 28 August 2018, just a few weeks prior to the announcement by Infrastructure Australia that it would designate the NELP as a high priority project.

The SRL is an orbital urban rail passenger service anticipated to run from Cheltenham to Werribee via major activity centres including Box Hill, Heidelberg, Melbourne Airport and Sunshine. The project is strongly promoted by the Victorian Government as a means to create a polycentric Greater Melbourne, one no longer solely concentrated on the Melbourne CBD and served by a radial transport network. The Commonwealth recently made an initial funding commitment of \$2.2 billion to the project.

The final cost of SRL, together with its anticipated call upon Commonwealth capital funding is unknown at this stage. The original Victorian Government estimate in the order of \$50 billion for the project appears too low.

The major significance of the SRL for the purposes of NELP is that in its second phase (SRL North), the service would extend from Box Hill to Melbourne Airport and be largely duplicative of the route for NELP. It seems clear that Infrastructure Victoria would not have been in any position to take account of the impact of this project on the viability of the NELP. For this reason alone, we believe that the Commonwealth should task Infrastructure Australia with reviewing its assessment of the NELP.

#### *Freight and NELP*

The fourth issue concerns the weight that the Victorian Government assigns to road freight in justifying the increased road capacity the project would provide. In truth, though, most of the road space on the arterial road network in the corridor is taken by passenger cars where, for the most part, these vehicles have only one occupant, the driver. This is highly space inefficient. As discussed above, many of these trips would be capable of relocation to far more space efficient transport modes, and especially public transport. This would free up the road network for higher value heavy freight movements.

It is notable, though, that the proportion of all Victoria's freight that is carried by rail is very low. The movement of containerized freight from the Port of Melbourne is especially low. This is a matter that now needs urgent attention, both by Victoria and the Commonwealth.

It also appears implicit in Victorian Government support for NELP that it believes it would enable the development of Hastings as the location for Victoria's second container port. This has been an on again-off again proposition for some years now. However, Hastings would be a very unfavourable location for such a port, having regard for the land-based distribution task which would involve many locations within Victoria and interstate, but with relatively few of these destinations being in the south-east of Victoria. There are also major environmental considerations in Westernport Bay. Some of these issues played out in the lead-up to the refusal in March 2021 by the Victorian Government to permit the construction of a gas terminal near Hastings.

#### *Uncertain project costs and the public account*

The fifth issue, which is of particular concern in the uncertain economic times we now find ourselves in, concerns certainty in costs for the project and the potentially negative impact on the public account, both Commonwealth and State.

You will know that there have been concerns about cost escalation in other transport infrastructure projects in Victoria in recent years. The West Gate Tunnel project, for instance, a much more modest roads project than the NELP, was earlier estimated to cost \$5.5 billion and would be completed next year. More recently, it has been estimated that the project may cost about \$10 billion, and that it would not be completed until 2025.

Similarly, the cost of the Metro Tunnel rail project, initially anticipated to cost \$11 billion, was reported in 2020 to have increased by \$2.74 billion. These pressures would be exacerbated by the NELP. Serious attention needs to be given to the health of the public account, both federally and at state level. There is a significant overhang in public sector debt, largely as a consequence of the pandemic. This time, more than ever, is one for fiscal discipline by all levels of government, as cost pressures are certain to continue because of a number of factors, not the least of which are uncertainties associated with international supply chains, in some cases exacerbated by ongoing international conflict.

It is likely that there also cost overruns on Victoria's level crossing removal projects. The total program cost was reported in 2020 to be \$14.8 billion, but there is no reporting on the cost of individual projects, which have involved funding commitments as high as \$670 million.

When announced in December 2016, the Victorian Government said the NELP was expected to cost up to \$10 billion. Then, in May 2018, it was indicated the project would cost \$16.5 billion. Subsequently, in October 2021, the government announced that tunnelling for the project would extend for a further 1.9 kilometres. There has been no advice, as far as we are aware, of the effect of this announcement on anticipated project costs, but on the face of it appears likely to be significant.

In an appearance on 13 May 2022 before the Public Accounts and Estimates Committee of the Victorian Parliament, the Victorian Treasurer, The Hon. Tim Pallas, M.P., acknowledged that "commodity price rises, resourcing price rises, skill shortages and a lack of competition because of an overabundance of government activity around construction" were major factors in putting upward pressure on the cost of major government projects.

This observation follows in the wake of wider criticism by informed observers that "mega" projects, such as NELP, have often been far less cost effective than alternative initiatives that have addressed gaps in services, such as the potential, so far not explored, of improvements in route bus and other public transport services.

Self-evidently, there are also opportunity costs involved for governments, both Commonwealth and State. Housing, for instance, is a potentially large loser if overspending on major transport projects were to continue.

#### *Environmental risks and costs*

Finally, it should be borne in mind that a significant element of the cost over-run on the West Gate Tunnel project, the discovery of contaminated soil, and especially PFAS, may also become an issue with the NELP. It is unclear whether the assessment of the presence of contaminated soil is as thorough as it should have been. In addition, the changing climate

patterns, a result of climate change, must enhance the risk of serious flooding in the medium to longer term.

It would appear that the risk of cost increases with the significantly larger NELP, recently announced, is high. As noted above, there remain uncertainties about the cost escalation in the build itself, as it is primarily a large tunnelling project in an environmentally sensitive area, the Yarra Valley in the environs of inner Melbourne. Whilst the Victorian Government said that it chose the tunnel option to obviate environmental risks associated with the project, it may be found, on closer inspection, to accentuate environmental risk, rather than reduce it.

Stop North East Link Alliance submits, in conclusion, that the Commonwealth should reassess its position on capital funding for the NELP. Simply, a project of this scale should have a much greater positive benefit cost ratio than 1.3. This alone, should call the project into question.

We would be pleased to discuss this matter with you and we look forward to your response to our representations.

Yours sincerely

s47F - personal privacy

s22(1)(a)(ii) - irrelevant material

**From:** Roger Taylor  
**Sent:** Wednesday, 1 June 2022 12:45 PM  
**To:** King, Catherine (MP)  
**Subject:** Infrastructure portfolio

The Hon Catherine King

Dear Minister

My name is Roger Taylor. I am Chair of Transport for Melbourne and would like to pass on some of my concerns about the way precious government funds are spent, particularly on transport infrastructure and infrastructure more generally and the imperative to get value for money and provide the best possible return for the broader community.

There is a common misconception that the bigger the project the better it must be.

Invariably the reverse is the case. Mega infrastructure projects have a very poor track record and divert precious funds from areas of real need but also discourage more efficient and more effective use of existing infrastructure ie by more effective/efficient management, maintenance and operations or strategic investment that addresses systemic problems within the "service" it supports.

The second misconception is about the role of infrastructure itself. Its purpose is to support a service - such as transport and to facilitate that as cost effectively and efficiently as possible. On its own infrastructure has no intrinsic value - benefits are maximised by optimising the value provided by the services using it and minimising the cost generated by users (pollution etc) and infrastructure itself.

I have written a number of papers on this subject which I have attached, including a ministerial submission to the Victorian government in 2019 together with a short article which outline some of my concerns which you may find of interest. I would be very pleased to discuss this further together with opportunities to learn valuable lessons from world best practice - in the context of today's needs and the future we must plan for.

Yours sincerely

Roger Taylor

## Investing in Public Infrastructure

### Are we getting value for money and what can we do to achieve it

Infrastructure is the latest buzz word on every politician's lips. It is seen as the answer to restoring our staggering economy, an opportunity to promote economic growth and create more jobs. Governments at every level are spending a lot of money building new infrastructure projects. The Victorian government's "Big Build" boasts the delivery of approximately \$70 billion of transport projects including 119 major road and rail projects and the creation of over 15,000 jobs across Victoria. But most of this is being spent on a small number of mega projects. The latest on the Victorian government's drawing board is the Suburban Rail Loop (SRL). The Government says it will be "the biggest public transport project in Australian history" with a proposed start date of 2022 and completion date of 2050. The guestimated cost at this stage is \$50–100 billion" although is it likely to be much higher given the absence of a detailed feasibility study and an increasingly uncertain economic environment which is likely to compromise many of the assumptions that underpin its viability. The question we must ask - is this investment in areas where needs are greatest? Are we getting value for money, remembering that it is our money government is spending, and what are the risks?

The growth of mega projects is not confined to Australia. As Bent Flyvbjerg (Said Business School University of Oxford) notes in his in 2014 paper "**What You Should Know about Mega projects and Why**" " total global megaproject spending is assessed, at US\$6 to US\$9 trillion annually, or 8% of the total global gross domestic product (GDP), which denotes the biggest investment boom in human history". But as Flyvbjerg notes they have a terrible track record which he describes as his "iron law" of megaprojects: "megaprojects are systematically subject to "survival of the unfittest,"- "over budget, over time, over and over again"

This would not be so bad if these were inherently good projects and designed to meet community needs, but this is rarely the case. As Bent Flyvbjerg notes "Like the Tower of Babel, nations' rulers want to create the tallest, widest, biggest projects they can; and so often these are driven by ego rather than financial good sense". He describes these drivers as the four sublimes

1. the technological sublime as the rapture engineers and technologists obtain from building large and innovative projects, with their rich opportunities for pushing the boundaries for what technology can do,
2. the "political sublime", which is the rapture politicians obtain from building monuments to themselves and their causes
3. the "economic sublime", which is the delight financiers, business people and trade unions get from making lots of money and jobs from megaprojects. Given the enormous budgets for megaprojects, there are ample funds to go around for all rent seekers, including contractors, engineers, architects, consultants, construction and transportation workers, bankers, investors, landowners, lawyers and developers.

4. the "aesthetic sublime" is the pleasure designers and people who appreciate good design get from building, something very large that is also iconically beautiful, such as San Francisco's Golden Gate bridge or Sydney's Opera House.

There is a fifth sublime of course and that is the use of capital projects for shameless political pork barreling often linked to pressure from vested interest groups (rent seekers).

And this is how much of the community's money – our money paid from taxes and charges is now being spent today, and explains to a large extent why many areas of need become run down because they have been starved of funds. All of this is built on debt of course, which ultimately must be repaid but comes at a huge opportunity cost when investment in areas of real need remain neglected. This includes much of our existing infrastructure that is in poor condition because of inadequate maintenance or is in urgent need of upgrading or renewal.

It is time to get back to "basics" and understand what infrastructure is, its role, the way it creates value for the community and investment criteria that should be applied when evaluating and approving projects in the first place. It is also time to start applying proper processes to the evaluation, assessment process and ranking of projects as part of an overall planning framework and plan for the future. At a more detailed level it requires the identification of alternatives. For example many of the outcomes that could be achieved by an SRL could be achieved by improving the bus network, much of it to smart bus standard. This could be achieved at a fraction of the cost and very quickly, probably within a parliamentary term instead of decades and with minimal risk. It would also create many new jobs. There are other options of course. The question needs to be asked why these have not been included in the evaluation process. It is likely this option does not satisfy Flyvbjerg's sublimines. Whatever the reason pursuing the current trend will rapidly impoverish our State/nation and lead to disastrous social outcomes.

Government financing will become increasingly difficult in the future. This should force a radical cultural change in which governments and the community at large will be forced to do more with less. Some cities have demonstrated how this can be done. Frugal but appropriate and well designed investment in physical infrastructure releases government funds for other areas of need, particularly in social infrastructure: public health, education, research and development, community services, and many others that are highly valued by the community and contribute to its livability and its place as a civil society. It also enables communities to focus more sharply on the social and environmental challenges ahead, challenges that will dwarf those of the past and will need to be tackled seriously and effectively with increasing urgency.

Future investment in public infrastructure must become an integral part of a broader sustainability strategy in which resource use will be a key issue. This will require a fundamental shift in thinking by government and many of its agencies about the role of infrastructure, the way it is operated and managed and the demands placed on it in the future.

Roger Taylor: Chair Transport for Melbourne, August 2020

# The Cost of Rushed Projects

*“Nineteen-story Box Hill tower wins planning approval in path of Suburban Rail Loop. Taxpayers look set to fork out for a multimillion dollar land acquisition bill after a 19-storey hotel was given approval to be built in the path of the Suburban Rail Loop”.* KIERAN ROONEY AND MATT JOHNSTON, Herald Sun April 19, 2022.

How could this happen to the State’s largest infrastructure project which has not been fully costed but may cost well in excess of \$120 billion? A lay person might be tempted to suggest that someone has been very cunning, very stupid or even corrupt. More likely this is the result of system failure that was bound to happen with a mega project such as this that has been rushed without extensive planning. Whatever the cause it should not have happened and would not have happened if the project had been thoroughly evaluated, planned and developed along traditional lines with the appropriate checks and balances that had been employed in earlier times.

But this may only be the start of many problems that are becoming apparent with this project. Transport experts have already expressed concern about planning and design of station precincts and integration with other elements of the transport network. This will be critical if the SRL is to deliver the quality of service necessary to encourage people to use it in sufficient numbers to justify the huge expense of this project. Often it is the quality of design and attention to detail that determines the outcome and already there are worrying signs of shortfalls in this area.

But the more important question is whether this project can be justified at all. The first question that must be asked is the extent to which this project improves Melbourne’s transport outcomes for the transport system as a whole, and if this is the case whether there are more cost-effective ways of doing this. System improvements are rarely achieved by a single project such as this. It invariably requires multiple actions in many areas – not just the rail network, the need to respond to a rapidly changing world and the environmental imperative to achieve zero emissions by 2035 at the latest.

This project achieves none of the above. The project is an addition to the existing rail network and will provide some integration with the public transport service which caters for only a small proportion of Melbourne’s transport task. The impact on public transport patronage is tiny and is confirmed by the SRL Business Case below.

<b>Greater Melbourne</b>			
<b>Weekday trips in 2056</b>	<b>No SRL</b>	<b>With SRL</b>	<b>Difference</b>
Private vehicle	26,803,000	26,197,000	-606,000
Public transport	3,294,000	3,530,000	+236,000
PT share of motorised trips	10.9%	11.9%	+1.0%
SRL boardings		433,700	+433,700
<b>Weekday trip-km in 2056</b>			
Private & public together*	252,003,000	249,070,000	-2,933,000
Average km per trip	8.4	8.4	

\* trip-km are not broken down between private and public

These numbers take into account land use changes the SRL will ‘induce’ in each SRL station precinct. The overall effect is to increase PT’s share of motorised travel by 1% Melbourne-

wide. Better integration of the public transport system is necessary but can be achieved much more quickly and cost effectively in other ways.

The SRL will do nothing to address systemic problems that already exist within the transport network as a whole which includes all modes of transport. Any environmental impact will not be realised for many years by which time social, economic and environmental conditions will have necessitated significant changes to the transport task and the way people travel. Given its lack of flexibility there is a high risk this new project will become a stranded asset leaving a legacy of debt that will become an increasing burden for future state governments and the broader community.

The most appropriate transport strategy today is one that focuses on actions and projects that achieve rapid reductions in greenhouse emissions. This requires many actions across the transport network applied to all modes of travel. This will be denied by the SRL which will take the lion share of funding leaving very little for anything else. All of these issues should have been addressed in a feasibility study that should have been carried out before any commitments were made. In this case a rough, back of the envelope assessment should have been sufficient to eliminate it as a worthwhile project.

#### Note

The SRL will, according to the modelling, attract 434,000 boardings a day, but the net increase in PT trips is only 236,000, suggesting that nearly 200,000 SRL trips would be using other PT if SRL wasn't there. The overall effect is to increase PT's share of motorised travel by 1% Melbourne-wide.

Note that, in the 'no-SRL' case, 2056 PT mode share is predicted to be only 11%, which is not much different to what it is today. "20% by 2030" is long gone! Note also the transport modelling that produces these answers is largely not peer-reviewed, so the degree of confidence in them is low – however, the cost-benefit analysis is based on them.

It is argued that the rapidly changing environment, which will be increasingly driven by climate change, which assume to a large extent continuation of business as usual will render traditional transport models invalid.

# s22(1)(a)(ii) - irrelevant material

**From:** s47F - personal privacy  
**Sent:** Tuesday, 30 August 2022 10:23 AM  
**To:** Albanese, Anthony (MP) <[A.Albanese.MP@aph.gov.au](mailto:A.Albanese.MP@aph.gov.au)>  
**Cc:** King, Catherine (MP) <[Catherine.King.MP@aph.gov.au](mailto:Catherine.King.MP@aph.gov.au)>; Butler, Mark (MP) <[Mark.Butler.MP@aph.gov.au](mailto:Mark.Butler.MP@aph.gov.au)>  
**Subject:** Correspondence from the Hon David Davis MP

Dear Prime Minister,

Please find attached correspondence from the Hon David Davis MP.

Yours sincerely

s47F - personal privacy

Office of the Hon David Davis MP | Leader of the Opposition in the Legislative Council  
Shadow Treasurer; Shadow Minister for the Arts and Creative Industries  
Lvl 1, 670 Chapel Street, South Yarra VIC 3141  
mobile s47F - personal privacy | phone 03 9827 6655  
email s47F - personal privacy

Office of  
**David DAVIS MP**  
LIBERAL MEMBER FOR SOUTHERN  
METROPOLITAN REGION



[www.daviddavis.com.au](http://www.daviddavis.com.au)



[/DavidDavisMLC](https://www.facebook.com/DavidDavisMLC)



[@DavidDavisMLC](https://twitter.com/DavidDavisMLC)

# Hon. David **DAVIS** MP

MEMBER FOR **SOUTHERN METROPOLITAN REGION**

Leader of the Opposition in the Legislative Council  
Leader of the Liberal Party in the Legislative Council



Shadow Treasurer, Shadow Minister for the Arts and Creative Industries

Honourable Anthony Albanese MP  
Prime Minister of Australia  
Parliament House  
Canberra, ACT 2600

By Email: [a.albanese.mp@aph.gov.au](mailto:a.albanese.mp@aph.gov.au);

Cc The Hon Catherine King MP, Minister for Infrastructure  
Catherine.King.MP@aph.gov.au  
Cc The Hon. Mark Butler MP, Minister for Health  
Mark.Butler.MP@aph.gov.au

Dear Prime Minister,

I write to inform you of the Liberal and National Parties' plan to shelve the Victorian Labor Government's proposed \$35 billion Cheltenham to Box Hill leg of the Suburban Rail Loop, and instead use every available dollar of that money to fix and modernize Victoria's ailing health system.

As you would be aware the Victorian health system is in crisis with nearly 90,000 people on hospital waiting lists, patients having to be treated in tents in hospital grounds because of a lack of beds, emergency departments being overwhelmed while the ambulance service is struggling to cope – which has had on occasion lead to deaths. Further the health service is facing an unprecedented staffing crisis which must be addressed at the first opportunity.

You would also be aware that Infrastructure Australia has not assessed the Suburban Rail Loop project, and that recent independent analysis by the Victorian Parliamentary Budget Office has estimated a cost blow out (for the first two stages only) to \$200 billion. Further, the PBO has found that the project will return only 60 cents on the dollar and is likely to result in a "net social cost".

During the recent Federal election campaign, you committed \$2.2 billion in Federal funding to the project.

Premier Andrews has publicly stated that he will seek further significant funding commitments from the federal government.

Given our commitment to shelve the Cheltenham to Box Hill rail line in favour of health, I seek your commitment that should we be elected to form Government in Victoria on November 26, any federal funding committed to that project now or in the future will be redirected to Victoria's health system.



[david.davis@parliament.vic.gov.au](mailto:david.davis@parliament.vic.gov.au)



9827 6655



[www.daviddavis.com.au](http://www.daviddavis.com.au)



DavidDavisMLC



isMLC



DavidDavisMLC

Should we win government, I would like to assure you that we would of course work constructively and cooperatively with you and your government on the specifics of how this might be best achieved.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'David Davis', with a large, sweeping initial 'D'.

David Davis MP  
**Shadow Treasurer**

# s22(1)(a)(ii) - irrelevant material

**From:** s47F - personal privacy @constructors.com.au > On Behalf Of Jon Davies  
**Sent:** Friday, 15 July 2022 11:27 AM  
**To:** Catherine king <Catherine.king.mp@aph.gov.au>  
**Cc:** s47F - personal privacy @MO.infrastructure.gov.au>; Jacinta.allan@parliament.vic.gov.au;  
deputy.premier@ministerial.qld.gov.au; Minister.Saffioti@dpc.wa.gov.au; Minister.Koutsantonis@sa.gov.au;  
minister.fyles@nt.gov.au; minister.lawler@nt.gov.au; Michael.ferguson@dpac.tas.gov.au;  
pittwater@parliament.nsw.gov.au; deputy.premier@ministerial.qld.gov.au  
**Subject:** Renewed united call for the Federal Government to implement recommendations in the  
**Importance:** High

Dear Minister King

On 23 September 2021, the peak industry associations collectively representing the majority of organisations involved in delivering major infrastructure projects in Australia wrote to the then Federal Government calling for urgent implementation of reform recommendations in the 2021 Australian Infrastructure Plan. Please refer to the attached.

We bring our request to you with renewed optimism that through your government's leadership we will now see that action we called for last year taken forward. To promote collaboration across governments we are also sending this letter to infrastructure Ministers nationwide.

We stand ready to work with government to finally implement reform recommendations that will see the industry become more productive and sustainable for the benefit of all Australians.

Yours sincerely

Jon Davies  
Chief Executive Officer



s47F - personal privacy | [jon.davies@constructors.com.au](mailto:jon.davies@constructors.com.au)  
202 Boundary Street • Spring Hill • 4000

Executive Officer to CEO & Board Secretariat - Christine Gilfoyle  
s47F - personal privacy | [@constructors.com.au](mailto:christine.gilfoyle@constructors.com.au)

[constructors.com.au](http://constructors.com.au)



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15 July 2022

The Hon Catherine King MP  
Deputy Prime Minister  
Minister for Infrastructure, Transport and Regional Development  
House of Representatives  
Parliament House  
CANBERRA ACT 2600

By email: [Catherine.King.MP@aph.gov.au](mailto:Catherine.King.MP@aph.gov.au)

Dear Deputy Prime Minister

### Renewed united call for the Federal Government to implement recommendations in the 2021 Australian Infrastructure Plan

On 23 September 2021, the peak industry associations collectively representing the majority of organisations involved in delivering major infrastructure projects in Australia wrote to the then Federal Government calling for urgent implementation of reform recommendations in the *2021 Australian Infrastructure Plan*. We write to you with renewed focus on implementing this request.

On its current course, the construction industry is not sustainable. The industry suffers from some of the highest rates of insolvencies in Australia, low productivity growth, poor rates of female participation and high stress levels and suicide rates. Not surprisingly, the industry is struggling to attract and retain sufficient people. By mid-2023, the industry is predicted to experience a shortfall of 105,000 construction workers. This is the industry that all levels of government are relying on to deliver economic stimulus through the construction of a record \$218 billion pipeline of infrastructure projects.

Despite universal alignment on the problems and the solutions, implementation of reform recommendations outlined in the *Australian Infrastructure Plan* have been slow and sporadic. This is putting at risk the delivery of the record pipeline of projects and realisation of a substantial productivity opportunity in the vicinity of \$15 billion.

To support the reforms proposed in their 2021 Plan, Infrastructure Australia's *Delivering Outcomes* report defines a practical and pragmatic suite of 30 actions across seven focus areas. These meaningful and implementable reforms were developed through engagement with industry and government. They provide a framework of shared action to drive necessary change.

There is unanimous government and industry support for reform recommendations. Concluding its inquiry into government procurement processes, in March 2022 the House of Representatives Standing Committee on Infrastructure, Transport and Cities reported on the urgent need to implement reform and the role the Commonwealth can play in making it happen (see *Government Procurement: A sovereign security imperative*).

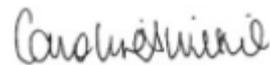
In our view, we do not need any further research or studies—we know what needs to be done. It is time for action. Greater collaboration and coordination between industry stakeholders and delivery agencies, with leadership from the Federal Government, is needed to implement the required reforms. With the proposed review of Infrastructure Australia's operations, we call on the Federal Government to drive consistent and widespread change across Australian jurisdictions.

We bring our request to you with renewed optimism that through your government's leadership we will now see that action we called for last year taken forward. To promote collaboration across governments we are also sending this letter to infrastructure Ministers nationwide. We stand ready to work with government to finally implement reform recommendations that will see the industry become more productive and sustainable for the benefit of all Australians.

Yours sincerely



**Jon Davies**  
Chief Executive Officer  
Australian Constructors  
Association



**Caroline Wilkie**  
Chief Executive Officer  
Australasian Railway  
Association



**Grant Warner**  
Chief Executive Officer  
Australian Institute  
of Quantity Surveyors



**Eric Bugeja**  
Chairperson  
Building SMART Australasia



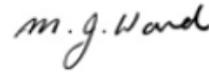
**Nicola Grayson**  
Chief Executive Officer  
Consult Australia



**Michael Luddeni**  
Acting Chief Executive Officer  
Engineers Australia



**Ainsley Simpson**  
Chief Executive Officer  
Infrastructure Sustainability  
Council of Australia



**Michael Ward**  
Chair  
Lean Construction  
Australia and New Zealand



**Andrew Chapman**  
Chief Executive Officer  
Queensland Major  
Constructors Association



**Christina Yiakkoupis**  
Chair  
NAWIC National Board



**Michael Kilgariff**  
Chief Executive Officer  
Roads Australia

Encl. 2021 Letter to the former Federal Government

CC:

The Hon. Jacinta Allan, Deputy Premier Victoria, Minister for Transport Infrastructure, Minister for the Suburban Rail Loop, Minister for Commonwealth Games Delivery  
Via: [Jacinta.allan@parliament.vic.gov.au](mailto:Jacinta.allan@parliament.vic.gov.au)

The Hon. Rob Stokes, MP, Minister for Infrastructure, Cities and Active Transport, NSW  
Via: <http://www.nsw.gov.au/ministerstokes>

The Hon. Dr Steven Miles MP, Deputy Premier, Minister for State Development, Manufacturing, Infrastructure and Planning, Qld  
Via: [deputy.premier@ministerial.qld.gov.au](mailto:deputy.premier@ministerial.qld.gov.au)

The Hon. Rita Saffioti MLA, Minister for Transport, Planning and Ports, WA  
Via: [Minister.Saffioti@dpc.wa.gov.au](mailto:Minister.Saffioti@dpc.wa.gov.au)

The Hon. Anastasios (Tom) Koutsantonis MP, Minister for Infrastructure and Transport, Minister for Energy and Mining SA  
Via: [Minister.Koutsantonis@sa.gov.au](mailto:Minister.Koutsantonis@sa.gov.au)

Hon Natasha Fyles, Chief Minister, Minister for Major Projects  
Via: [minister.fyles@nt.gov.au](mailto:minister.fyles@nt.gov.au)

Hon Eva Lawler, Treasurer, Minister for Infrastructure, Planning and Logistics  
Via: [minister.lawler@nt.gov.au](mailto:minister.lawler@nt.gov.au)

Mr Michael Ferguson MP, Deputy Premier, Treasurer, Minister for Infrastructure and Transport  
Minister for Planning, TAS  
Via: [Michael.ferguson@dpac.tas.gov.au](mailto:Michael.ferguson@dpac.tas.gov.au)

s22(1)(a)(ii) - irrelevant material

-----Original Message-----

From: info@victransport.com.au <info@victransport.com.au>

Sent: Friday, 24 June 2022 12:27 PM

To: King, Catherine (MP) <Catherine.King.MP@aph.gov.au>

Cc: Brown, Carol (Senator) <Senator.Carol.Brown@aph.gov.au>; Mulino, Daniel (MP) <Daniel.Mulino.MP@aph.gov.au>;  
s47F - personal privacy@aph.gov.au

Subject: Correspondence for Hon Catherine King

The Office of Hon Catherine King,  
Minister for Infrastructure, Transport, Regional Development and Local Government

Please find attached correspondence and attachments for Hon Catherine King.

Thank you.

s47F - personal privacy

Secretary,  
Victorian Transport Action Group,  
Phone: s47F - personal privacy  
Email: info@victransport.com.au  
Web site: www.victransport.com.au



## VICTORIAN TRANSPORT ACTION GROUP

Email: [info@victransport.com.au](mailto:info@victransport.com.au)

Facebook: [www.facebook.com/victoriantransportactiongroup](https://www.facebook.com/victoriantransportactiongroup)

Hon Catherine King,  
Minister for Infrastructure, Transport, Regional Development and Local Government,  
PO Box 6022,  
House of Representatives,  
Parliament House,  
Canberra, ACT 2600.

24<sup>th</sup> June 2022

By email to: [Catherine.King.MP@aph.gov.au](mailto:Catherine.King.MP@aph.gov.au);

Dear Minister King,

The members of the Victorian Transport Action Group (VTAG) wish to offer their congratulations on your recent appointment as Minister for Infrastructure, Transport, Regional Development and Local Government.

VTAG looks forward to developing a collaborative and respectful working relationship with you and your office into the future as there are many big integrated transport issues needing community engagement, discussion, and participation.

In particular VTAG would like to engage with you and your office, as soon as convenient, to discuss some major planning and implementation issues emerging on the Sunshine – Albion component of the Melbourne Airport Rail Line (MARL) Project where the Federal government has a 50/50 funding stake of \$5Billion.

As your office is aware VTAG has produced three discussion papers on this matter and attaches them again for your perusal:

- Bringing Sunshine Out of the Shadows (April 2021)
- Service Step Ups for Sunshine (Sept 2021) and
- Let Sunshine Shine with an Integrated Plan (Dec 2021).

VTAG has also made a submission to the Sunshine Station Masterplan process – copy also attached for your office's information.

The local Member for Fraser, Dr Daniel Mulino MP has been kept up to date with community concerns.

Community groups have also been in contact with Infrastructure Australia officers providing information about community concerns with planning and design issues.

Requests have been made to the Victorian Government for copies of the MARL Business Case and the Environmental Effects Statement (EES) papers along with information about the MARL Commonwealth State Steering Committee without success.

VTAG is looking to your office for support to more open, transparent, and collaborative processes for the MARL Project going forward.

VTAG members are available to meet in Sunshine. The aim would be to meet at the Station to show and discuss with you and your advisors, firsthand, the long term issues that will impact the area should the project proceed as currently planned.

VTAG is open to other meeting options as we fully appreciate the time and availability pressures commensurate with multiple ministries. We respectfully look forward to hearing from you.

With best wishes

Yours sincerely

**Mike Reece**

Mike Reece,  
Secretary,  
Victorian Transport Action Group (VTAG).

Copy by email to:

s47F - personal privacy, Office of Hon Catherine King, s47F - personal privacy [@aph.gov.au](mailto:@aph.gov.au);

Dr Daniel Mulino, [Daniel.Mulino.MP@aph.gov.au](mailto:Daniel.Mulino.MP@aph.gov.au),

Senator Carol Brown, [senator.carol.brown@aph.gov.au](mailto:senator.carol.brown@aph.gov.au);

Attachments:

- Bringing Sunshine Out of the Shadows (April 2021)
- Service Step Ups for Sunshine (Sept 2021) and
- Let Sunshine Shine with an Integrated Plan (Dec 2021).
- Submission to the Sunshine Station Masterplan (April 2022)

# VTAG VICTORIAN TRANSPORT ACTION GROUP

Email: [info@victransport.com.au](mailto:info@victransport.com.au)

Facebook: [www.facebook.com/victoriantransportactiongroup](https://www.facebook.com/victoriantransportactiongroup)

## Let Sunshine Shine with an Integrated Plan



Transport Infrastructure Development Corporation NSW Chatswood Transport Interchange

November 2021

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## About the Victorian Transport Action Group (VTAG)

This submission is made by the Victorian Transport Action Group (VTAG), an independent forum focused on solutions to Victoria’s transport challenges.

Members of VTAG have expertise across passenger and freight transport, urban and regional planning, State and Local Government, I.T. and the environment, engineering, architecture, and urban design.

VTAG has an extensive network of connections in state, local government, industry, and academia across planning and public transport that it draws on for insights into the complexity of transport issues and seeks to provide options for equitable, practical, and constructive solutions.

Members are familiar with the challenges of developing and implementing transport plans across all transport modes and understand the difference between blue sky ideas and the reality of funding, political interest, and community support. We are particularly conscious that limits on funding necessitate placing priorities on projects and of the need to conduct balanced examination of often competing agendas. We strive to achieve that objective.

Contact:

**Mike Reece,**  
**Secretary,**  
**Victorian Transport Action Group**  
**Email: [info@victransport.com.au](mailto:info@victransport.com.au)**  
**Phone s47F - personal privacy**

## Executive Summary

The Victorian Transport Action Group (VTAG), with community support, is sceptical about the Victorian Government's commitment to redevelop Sunshine in accordance with the objectives of *Plan Melbourne*.

The Government's focus on project delivery at the expense of integrated planning puts at grave risk a once in a generation opportunity to transform Sunshine into a vibrant hub serving Melbourne's west.

This document sets out VTAG's concerns with the lack of an integrated plan to guide Sunshine's development and the failure of the Government to effectively engage with the local community. It is a companion to VTAG's *Bringing Sunshine out of the Shadows* paper published in April 2021.

This paper identifies the scale of change needed to successfully transform Sunshine and recommends a series of community endorsed actions to remedy the flawed scheme currently proposed by Government for the Melbourne Airport Rail Link (MARL).

Sunshine is a regional super hub unlike any other. There is real danger that without an immediate pause to allow the preparation of an integrated plan Sunshine will be overwhelmed by well-intentioned projects that compound existing problems and constraints. Constraints like the "at grade" Sunshine – Albion rail corridor that divides the city rather than invest in an elevated rail or tunnelled corridor that have been deployed in other centres.

Melbourne Airport Rail Link (MARL) is estimated to cost \$8-13B. Without an integrated plan, billions may be wasted by rushing to build and undermining the potential of the Sunshine Transport Superhub. This haste to build puts Sunshine on track to become a nationally significant example of a wasted opportunity for community building and economic development.

Sunshine's community is crying out for an overarching governance model that will effectively prepare an integrated plan and with the capability to oversee its implementation. To this end it is recommended that the Victorian Government immediately take the following steps:

1. **Pause work on the Sunshine - Albion<sup>1</sup> part of the MARL project.**
2. **Prepare an integrated plan for the transformation of Sunshine in consultation with local community**
3. **Establish a place-based governance model to oversight the plan's development and implementation**

This paper offers the rationale for VTAG's current position regarding the development of Sunshine and its surrounds. It identifies both the problems and offers for consideration a pathway to finding the solution. The attachment demonstrates that given the opportunity smart, visionary, and practical designs and plans can be developed to address the multiple problems and deliver what both local residents and Victorian's demand, a well thought-through project that satisfies the whole community.

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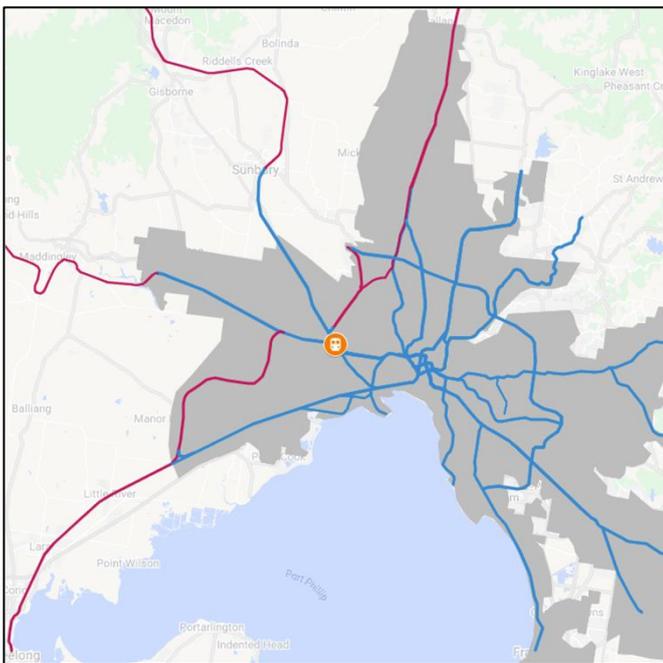
<sup>1</sup> \*The Albion Flyover, the Sunshine Station Masterplan, and the Sunshine Transport Precinct Plan

## Introduction

Sunshine is recognised as the capital of Melbourne’s rapidly growing Western Region. The success of the west is ultimately linked to the transformation of Sunshine into a vibrant regional hub<sup>2</sup>. Sunshine has the potential to become a regional service centre offering ready access to a higher levels of retail, hospitality, housing, business, education, health and wellbeing, community, transport, construction, justice, environment, and professional services.

The population of Melbourne’s West is expected to surge from the current 835,000 to over 1.8 million in 2050 – larger than Adelaide’s current population. Traditionally the west has suffered from an employment deficit with the population exceeding the available jobs making job creation a higher priority.

The Sunshine National Economic and Innovation Cluster (NEIC) has the potential to become an economic powerhouse and underpin the economic development needed to create the necessary local employment.



Sunshine is uniquely positioned as the best-connected centre in Australia outside of any CBD. The existing and proposed rail corridors provide direct access from the surrounding areas. It has close proximity to the Melbourne CBD, Airports (MA, Essendon, and Avalon) and the Port of Melbourne. It is the primary entry point from key regional areas including Bendigo, Ballarat, Albury/Wodonga, and Geelong.

Sunshine is a regional super hub unlike any other.

## The Transformation of Sunshine

The Wurundjeri People were the original custodians of the land which is today known as Sunshine and Albion. The initial urban development of Sunshine – Albion Precinct started with the establishment of a major manufacturing centre at beginning of twentieth century. This history grants the area a rich heritage which is celebrated by the local community. Today, the continuing growth of Melbourne’s west sees Sunshine now poised for further transformation into a regional hub supporting a population of over a million people. This potential is acknowledged in a raft of State Government initiatives.

- It is the only location in Melbourne with three prestigious planning classifications – a National Employment and Innovation Cluster (NEIC), a Metropolitan Activity Centre (MAC) and a Priority Precinct classification.

<sup>2</sup> [Sunshine Priority Precinct Vision 2050 March21.pdf \(brimbank.vic.gov.au\)](https://brimbank.vic.gov.au/Sunshine-Priority-Precinct-Vision-2050-March21.pdf)

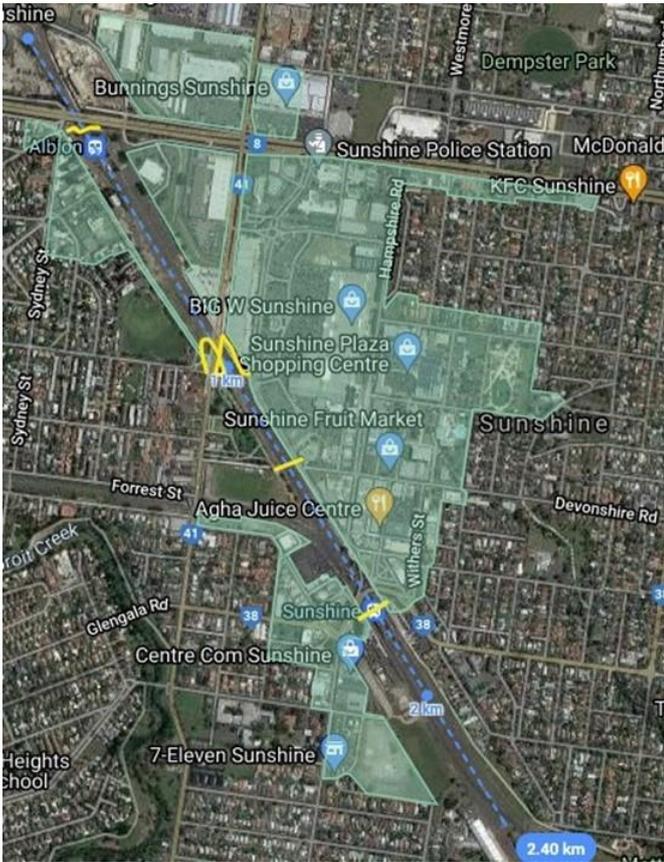
- It is a Transport Superhub like no other supported by existing rail infrastructure and new rail and public transport projects including:
  - Melbourne Metro 1
  - Melbourne Metro 2
  - Melbourne Airport Rail Line
  - Western Rail Plan
  - Victoria's Bus Plan
  - Suburban Rail Loop and
  - Standard Gauge rail service developments

These initiatives are expected to stimulate major urban redevelopment, yet the success of Sunshine's transformation is at risk due to a planning regime that is fragmented and dispersed across multiple agencies. There is real danger that without an immediate pause to allow a thorough planning review Sunshine will be overwhelmed by well-intentioned projects that compound existing problems and constraints.

Sunshine is currently on track to become a nationally significant example of wasted opportunity.

# The Problems

## Problem 1. A Community Divided



The main constraint on the centre's development is the very low amenity caused by the existing at-grade rail corridors that divide central Sunshine and foster low density, car-dependent suburban form. The key to unlocking Sunshine's potential and maximising its value proposition as the capital of Melbourne's West is to fully grade separate the Sunshine-Albion corridor. Removing the community severance at Sunshine's heart will enable Sunshine's transformation into a transit-oriented city for the 21st Century.



This problem is no more evident than in the existing pedestrian crossings of the rail corridor.

Only four crossings are provided in the entire 2.5km corridor through the heart of Sunshine, and these are all low quality, require significant detours and are poorly integrated with surrounding area.

## Problem 2. Fragmented Governance

Attempts to create an integrated plan to address Sunshine's development needs to date have failed due to planning responsibilities being split across at least five agencies and two levels of government.

The Department of Transport (DoT) has recently become the lead agency responsible for Sunshine's strategic planning. The DoT has stewardship of the Sunshine NEIC Draft Framework Plan<sup>3</sup> previously developed by the Victorian Planning Authority (VPA) in partnership with Brimbank Council. Unlike other NEICs, Sunshine is the only centre where DoT has this lead agency role. Typically the Department of Water, Environment, Land, and Planning (DWELP), which holds the necessary planning expertise, is responsible for these structure plans.

The DoT also has responsibility for developing an overarching Sunshine Transport Precinct Plan but is only now procuring the in-house capacity and capability to undertake this task. It is therefore not surprising that the start and completion dates of these important tasks are unknown.

In addition, the DoT is preparing a Draft Sunshine Station Masterplan ahead of the overarching Transport Precinct Plan and has recently deferred work on the complementary Albion Station Masterplan.

While these overarching and local plans continue to be developed, it is of concern that Rail Projects Victoria (RPV) is advancing its plan for the Melbourne Airport Rail Link (MARL) project. Whilst the MARL is welcome, the infrastructure currently proposed place severe limits on the future development plans for Sunshine centre.

The misalignment of departmental capability and planning need is perhaps the best explanation for the current lack of an integrated plan.

## Problem 3. No Integrated Plan

The lack of unitary governance has resulted in a multiplicity of disconnected plans leaving Sunshine without any overarching planning framework. The last four years has seen multiple plans created or commenced including:

- Sunshine NEIC Draft Framework Plan (Draft: 2017, Final TBA)
- Draft Sunshine Station Master Plan (in development)
- Albion Station Master Plan (deferred)
- Draft Sunshine Transport Precinct Plan (in development)
- Sunshine Super Hub and Albion Station - Urban Design Principles (2018)
- Sunshine Priority Precinct Vision 2050: Leading with Vision (2021)
- Draft Western Region Land Use Framework Plan (2021)

At the present time there is no integrated plan that properly addresses Sunshine's future development and incorporates the proposed rail developments alongside plans from other sectors that fundamentally impact the area. Relatively small but important initiatives such as the provision of passenger access to regional standard gauge services are failing through these planning cracks.

Sunshine typifies what the Victorian Auditor General's Office (VAGO) has called a failure of integrated planning<sup>4</sup>.

<sup>3</sup> [Sunshine-National-Employment-and-Innovation-Cluster-Draft-Framework-Plan-VPA.pdf \(vpa-web.s3.amazonaws.com\)](https://www.vpa.vic.gov.au/~/media/1/2/3/Sunshine-National-Employment-and-Innovation-Cluster-Draft-Framework-Plan-VPA.pdf)

<sup>4</sup> <https://www.audit.vic.gov.au/report/integrated-transport-planning?section>

## Problem 4. Trust Us – the Engineers Know Best

The DoT is conflicted by its responsibilities for both planning and the rapid delivery of the State's *Big Build*. This conflict is evidenced at Sunshine by the pre-emptive adoption of four rail-centric "givens":

1. the "at grade" Sunshine - Albion rail corridor option for MARL and future rail projects.
2. the planned build of a 20 metre-high, 2 km long expensive piece of grade separation infrastructure (aka the Albion Flyover).
3. the planned development of Sunshine Transport Superhub in its current location; and
4. the planned expansion of the Sunshine railway station south-east towards Melbourne, away from the Sunshine CBD area.

These givens have been developed for the purposes of rapid project delivery without proper consideration of Sunshine's longer term needs for social and economic growth. Currently the RPV rail implementation group dominates decision making within the DoT. The planning visions for Sunshine developed by Council, university and the wider community have been largely ignored in favour of narrow project considerations of project time, cost, and disruption.

The justification for these "givens" is that rail engineers know best. Minimal consultation has occurred and no substantial advice about the costs and benefits of any alternative options has been made available (despite the Transport Integration Act requirements to do so). The wider community is angry that it has not been provided an opportunity to consider any other options or any meaningful opportunity to participate in the decision-making process.

In a further affront for the community, the DoT has recently rejected a community FOI request for documents related to options assessment. The DoT reasoning that the release of this information is "not in the public interest"<sup>5</sup>.

From the information available the community understands that no examination has been undertaken of the full grade separation for the entire Sunshine-Albion corridor, overlooking the benefits of elevated rail that have been demonstrated for other Melbourne centres.

## Problem 5. The Lack of Oversight

The Victorian Government is proceeding to implement the MARL without the endorsement of Australia's peak review agency, Infrastructure Australia.

The Commonwealth Government and Victorian Government have each committed \$5B to build the MARL. However, the Victorian Government has not yet submitted the project business case to Infrastructure Australia (IA) for review as is necessary before Commonwealth funding can be committed. Further, a formal Memorandum of Understanding (MOU) between the Commonwealth and Victorian governments for MARL has not yet been finalised.

In September 2021, in response to community concerns the Commonwealth advised<sup>6</sup>:

*I understand the Albion & Ardeer Community Club concern with the recent announcement of concept designs for the Maribyrnong River Rail Bridge and elevated twin tracks between the Sunshine and the Albion Junction.*

<sup>5</sup> Correspondence from Rail Projects Victoria, 23 Nov 2021

<sup>6</sup> Correspondence from the Office of the Hon Paul Fletcher, 2 Sept 2021 – emphasis added.

*Please be aware these concept designs are subject to approval and could change. I encourage you and your counterparts to continue to raise your concerns with the Victorian Government*

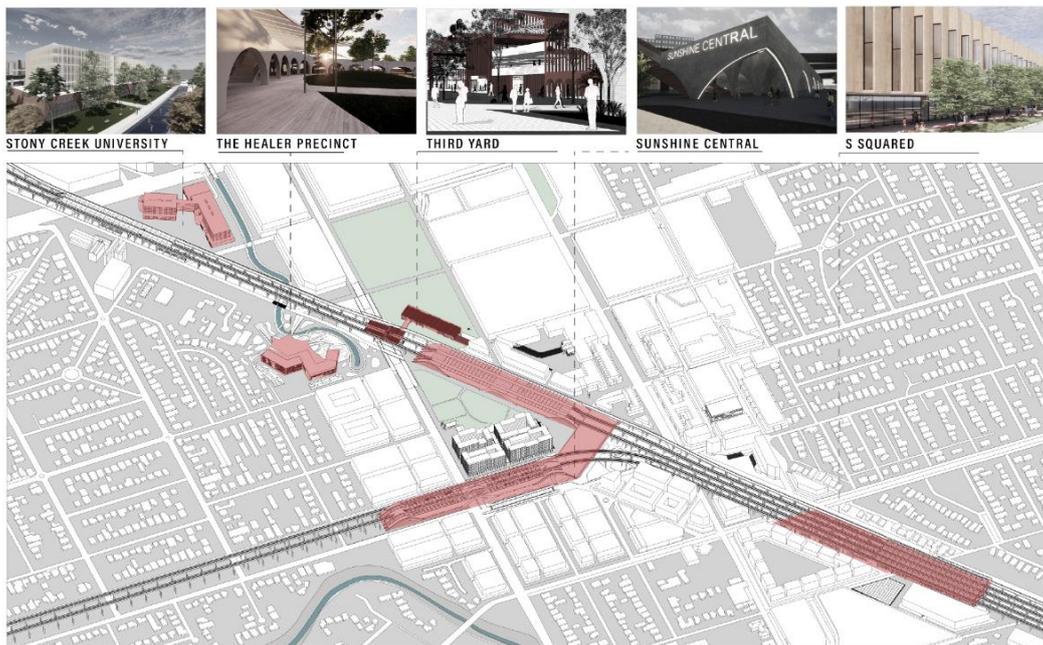
The community's concerns have been continuously raised with both the DoT and RPV and have been repeatedly met with a "not negotiable" response.

The awarding of contracts before the Commonwealth has completed a full and thorough review of the project risks a repeat of the costly East-West Tunnel project debacle.

## The Solution

Sunshine lacks a visionary, integrated development plan to support its economic growth and development into the vibrant centre needed for Melbourne's growing west. The lack of vision is even more stark when comparing Sunshine to other metropolitan centres such as Box Hill and Dandenong. For Box Hill the lowering of the railway has supported the centre to expand into a major activity centre. Whilst for Dandenong, the successful implementation of an integrated plan has revitalised and transformed this centre. In both cases, the initial public investments attracted major private sector investments generating jobs and subsequently enhancing the appeal of these centres as a place to live, work and visit. As Sunshine-Albion is more of a corridor, a more linear elevated rail approach is likely to pay similar dividends.

A recent design study at Swinburne School of Design and Architecture considered both elevating and undergrounding the existing rail corridor. The designs shown in Attachment 1 illustrate the possibilities for a revitalized Sunshine of each approach.



**Project 30-20** by: *Anna Heath, Kaila Gordon, Jack Brown, Rebecca King and Caitlin Grimmatt, School of Design and Architecture, Swinburne University of Technology*

To progress with the development of an integrated plan that will allow Sunshine to shine we recommend that the government take the following steps:

### Step 1. Pause and Review

Pause the proposed letting of MARL Sunshine-Albion Package Alliance Contracts and commence an independent expert review of Sunshine's current messy policy situation and how to better integrate land-use and transport planning.

The crash through approach to building MARL in the absence of a current and relevant overarching Sunshine NEIC Framework Plan or a Transport Precinct Plan creates a void which has now filled the community and potential investors with uncertainty. The quality of decision making on the MARL in the Sunshine-Albion corridor is questionable given the failure for any consideration of the long-term impacts on Sunshine's future development and investment attractiveness and its ability to meet the aspirations of *Plan Melbourne*.

A short pause and independent planning review of the prevailing Sunshine situation is vital to ensure development quality and provide the community with assurance there is comprehensive and integrated plan. Given the MARL project is currently years ahead of the project's scheduled 2029 completion date time is available to pause and review.

## Step 2. Prepare an Integrated Plan

An integrated plan to achieve Sunshine's value proposition as the capital of Melbourne's West is urgently needed to guide specific development projects including the new transport infrastructure.

Sunshine cannot be developed and reach its full potential without an integrated plan that addresses the current problems of severance created by the at-grade tracks. Appropriate provision for current and future rail projects must take account of the important lessons learnt from successful grade separated rail corridors already built and planned for Melbourne.



Elevated rail and tunnelling schemes have been used to deliver significant community benefit all over Melbourne as more land is opened for mixed and/or prescribed development uses.

These options have not been properly considered for the Sunshine- Albion corridor while the existing "at grade" rail corridor is being presented by DOT as a not negotiable, long term "given".

The Level Crossing Removal Project's many successes and the Suburban Rail Loop are prime examples of the flow-on community benefits that can occur when the ground plane is freed up. Without a similar approach Sunshine will not reach

its full potential.

The success of any plan will depend on its acceptance by the local community. Key to this is the early involvement of Council and local communities within the planning and decision-making process.

An integrated plan is a "must have".

## Step 3. Establish a Place Based Governance Model

The scale of this development opportunity for Sunshine and the vision needed to realise its full potential goes well beyond the remit of any one agency and the organisational agency siloing to date have failed to date to produce the integrated planning and delivery required.

A proven solution to these problems is the establishment of an appropriate "place-based" development authority, similar to what was utilised for Docklands and Barangaroo.

As an urgent first step, we urge the state to establish a Ministerial Advisory Board to develop an integrated vision for the area, like has been done for another highly valuable designated NEIC - Fishermans Bend.

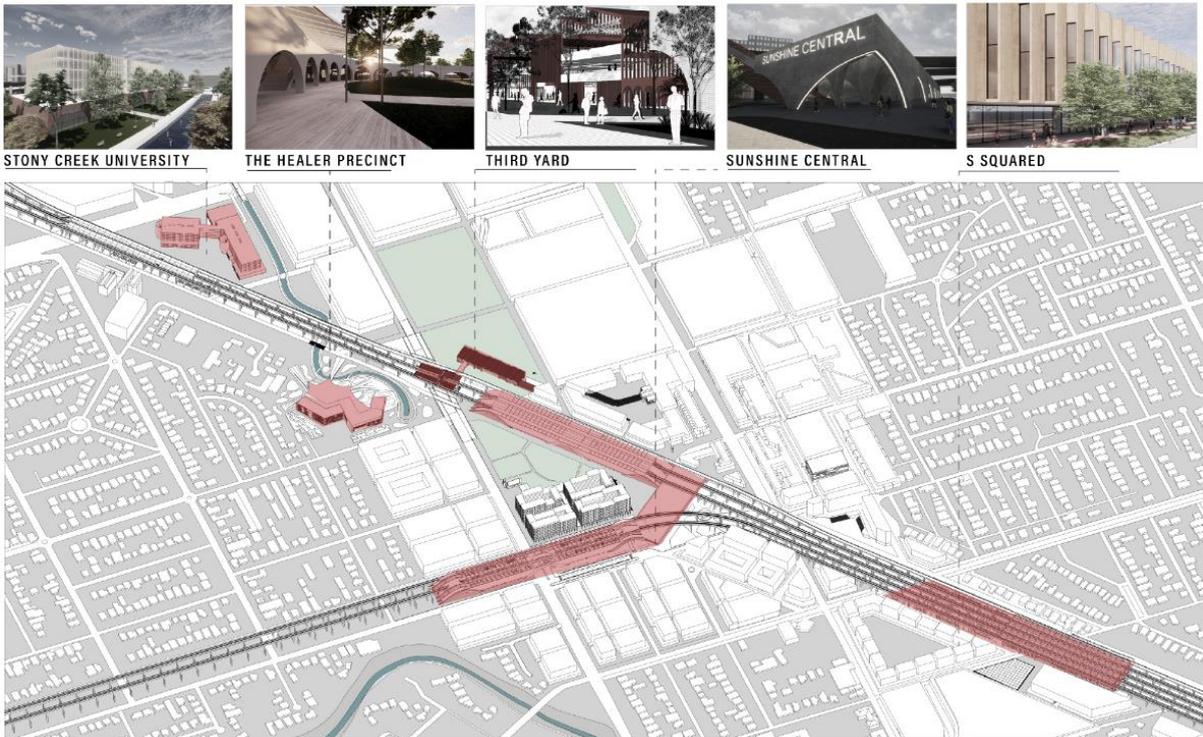
Sunshine's community is crying out for an effective overarching governance model and an integrated plan.

# Attachment 1

## Swinburne School of Design and Architecture – Sunshine Design Study

A recent design study at Swinburne School of Design and Architecture considered both elevating and undergrounding the existing rail corridors to improve the amenity and accessibility of the Sunshine precinct. The follow designs illustrate the possibilities for a revitalized Sunshine of each approach.

**Project 30-20:** *Opening up the centre of Sunshine to create a new heart by elevating the tracks through the Sunshine-Albion rail corridor and moving Sunshine Station northwards. The viaduct height enables existing road and rail transport to function while new infrastructure is built, minimising disruption and maximising amenity.*



### MASTERPLAN



BY ANNA

### MASTERPLAN



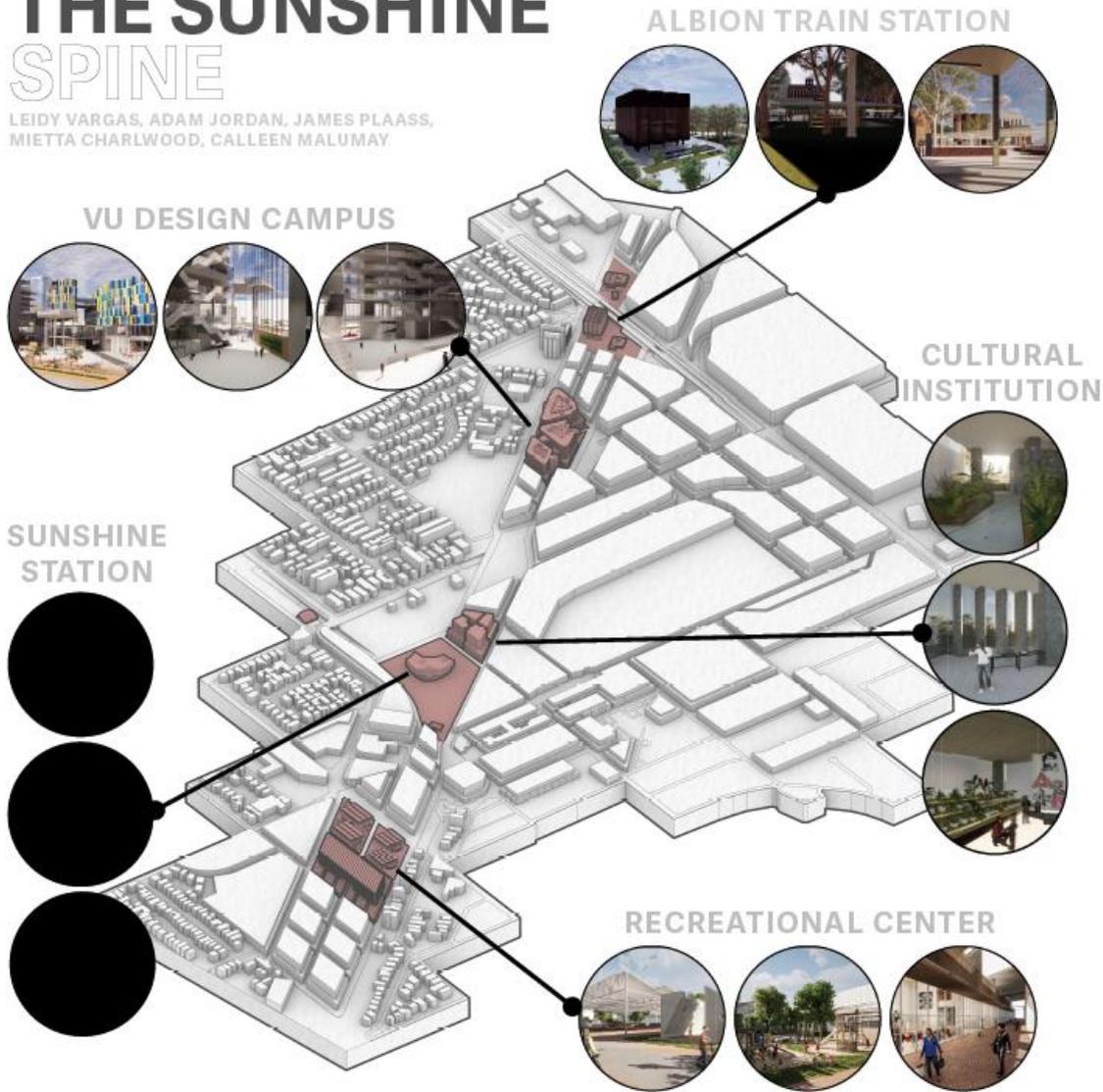
BY ANNA

*Project design by: Anna Heath, Kaila Gordon, Jack Brown, Rebecca King and Caitlin Grimmatt, School of Design and Architecture, Swinburne University of Technology.*

**The Sunshine Spine:** *Tunnelling through the entire Sunshine Albion corridor to allow existing transport infrastructure to function during construction. Once operational, the ground plane is free to be developed in ways that allow maximum connectivity within Sunshine and to provide enhanced civic places and institutions commensurate with a MAC at the heart of a National Employment and Innovation Cluster*

# THE SUNSHINE SPINE

LEIDY VARGAS, ADAM JORDAN, JAMES PLAASS,  
MIETTA CHARLWOOD, CALLEEN MALUMAY

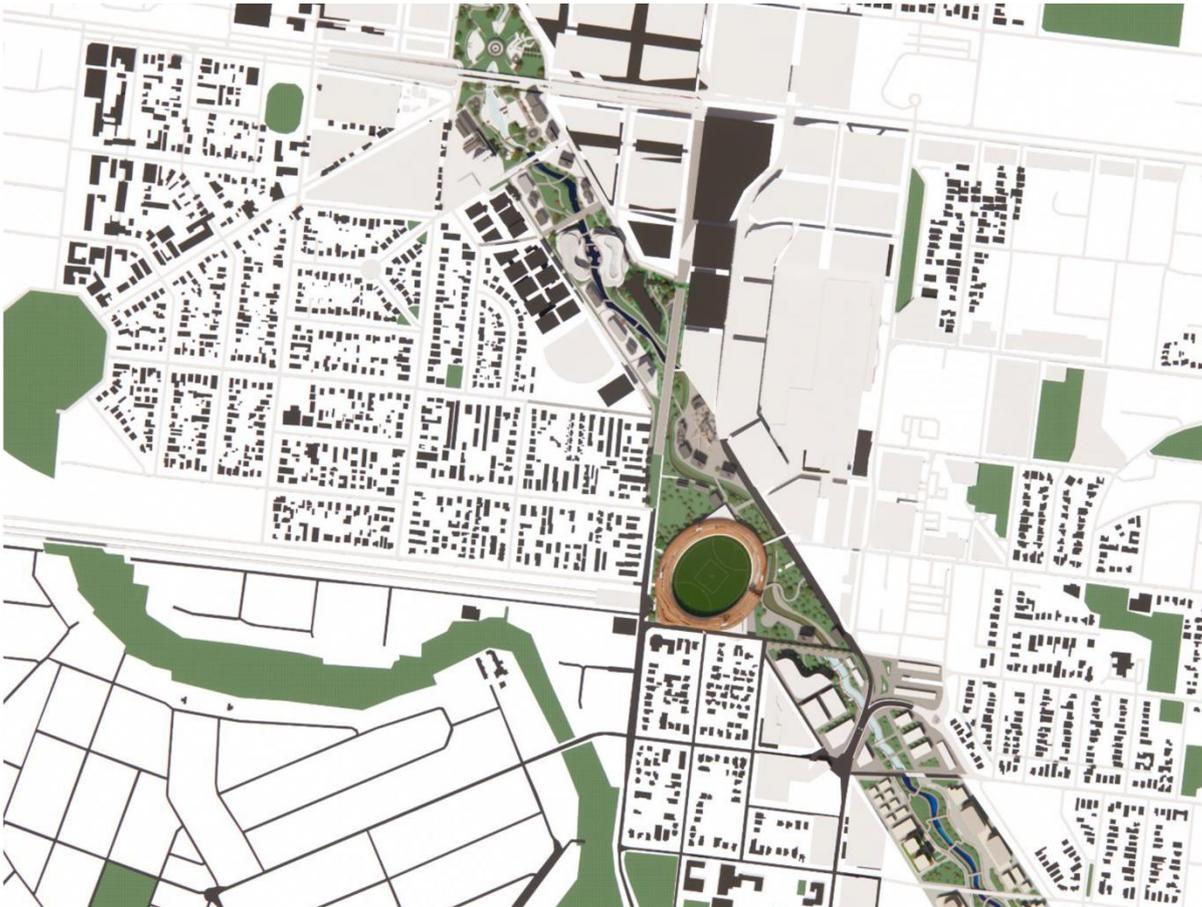


*Project design by: Adam Jordan, Mietta Charlwood, Calleen Malumay, James Plaass and Leidy Vargas, School of Design and Architecture, Swinburne University of Technology.*

**The Green Line:** *Tunnelling through the entire Sunshine Albion corridor to allow existing transport infrastructure to function during construction. Once operational, the ground plane is free to be developed in ways that allow maximum connectivity within Sunshine and to provide enhanced civic places and institutions commensurate with a MAC at the heart of a National Employment and Innovation Cluster*

**The Green Line** proposes to re-direct the Stony Creek watercourse through the centre of Sunshine to create a creekside linear park that provides much-needed open space, shade and enhanced amenity that will transform the development potential along the edges of the corridor.

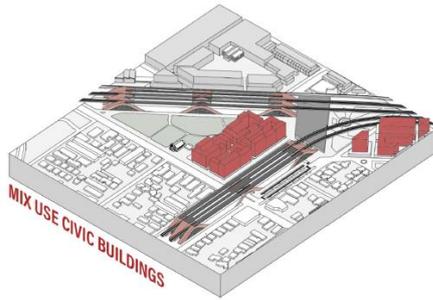
## THE GREEN LINE



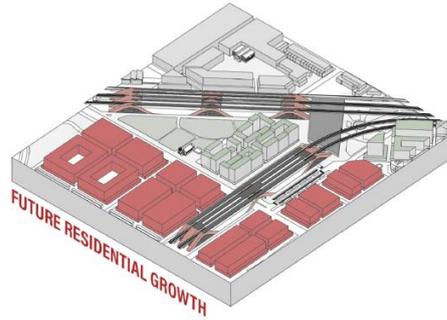
*Project design by: Bayden Atkins, Peter Vogiatzakis, Fraser Hood, Valentina Alvarado-Torres, Harshil Navadiya.*

**Sunshine Central:** *Expanding the potential for mixed-use transit-oriented development by elevating the rail lines and moving Sunshine station further north. This opens up immense urban renewal potential by maximising ground level connectivity and integrating the rail hub with the commercial heart of Sunshine. This also solves so-far intractable transport planning issues at Sunshine. Complex rail alignments are managed east, west and north of the Sunshine MAC area enabling a simpler track alignment amenable to integrated urban planning and design through the MAC itself.*

SUNSHINE CENTRAL



SUNSHINE CENTRAL



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*Project design by Anna Heath, School of Design and Architecture, Swinburne University of Technology*

# VTAG

## VICTORIAN TRANSPORT ACTION GROUP

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# Bringing Sunshine out of the Shadows



## A land-use planning based approach

April 2021

# BRINGING SUNSHINE out of the SHADOWS

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## ABOUT THE VICTORIAN TRANSPORT ACTION GROUP

This submission is made by the Victorian Transport Action Group (VTAG), an independent forum of transport professionals that meets monthly to discuss the challenges of transport in Victoria.

Members have a range of expertise across transport, planning, State and Local Government, IT and the environment, including past employment with Government, Government Agencies, Department of Transport, VicRoads and Academia.

VTAG has an extensive network of connections in local government, planning and public transport that it can access for insights into the complexity of transport issues and provide options for equitable, practical solutions.

Members are familiar with the challenges of developing and implementing transport plans across all transport modes and understand the difference between blue sky ideas and the reality of funding, political interest, and community support.

We are particularly conscious that limits on funding necessitate placing priorities on projects; and that in turn leads to communities competing to achieve outcomes that satisfy their needs.

Contact

*Mike Reece*

Mike Reece, Secretary,  
Victorian Transport Action Group  
Email:  
Phone s47F - personal privacy

## Sunshine - a victim of bad planning

**Sunshine is not an “integrated transport-focused metropolitan activity centre.”**

**It is a mess - a victim of raised expectations, poor planning, and undelivered promises.**

It started out as a major industrial complex built around regional rail access for delivering the famous Sunshine Harvesters and for processing barley and wheat coming back from western Victoria. Worker Housing for railway workers, factory workers and new arrivals soon sprang up around Sunshine, including a ‘garden-city’ estate in the neighbourhood now known as Albion featuring the heritage listed ‘HV McKay Memorial Gardens’.

Public transport, like most of the western suburbs, remained a low priority for decades. Car oriented shopping complexes were built, away from the station and surrounded by ugly car parks.

The Sunshine and Joan Kirner Hospitals were developed two stops north in their own precinct. Victoria University is split between two campuses in Sunshine and St Albans.

Recent transport planning has hyped a transformation of Sunshine as a SuperHub for seven separate rail services, (two of which now seem unlikely to pass through Sunshine):

1. The Regional Rail Link with additional tracks CBD to Sunshine and new line via Tarneit and Wyndham Vale opened in 2015.
2. The extended and electrified Sunbury line which will take Metro trains from 2025.
3. The Melbourne Airport Rail Link (MARL) – due to open in 2029.
4. The uncommitted Western Rail Plan to electrify the services to Melton and Wyndham Vale – *(these major centres are now served by Ballarat and Geelong trains respectively)*;
5. The \$2 billion “Faster train” to Geelong was to be routed through Sunshine but seems more likely to run via Werribee.
6. The western leg of the SRL was to run through Sunshine – but now seems destined to terminate at Melbourne Airport.
7. Providing a standard gauge passenger platform to enable transfers
8. Standard and broad-gauge freight services, including a new link to the proposed Western Interstate Freight Terminal (WIFT) in Truganina West.

Sunshine has been designated a **National Employment and Innovation Cluster (NEIC)** – one of just seven in *Plan Melbourne 2051*. A draft Framework Plan produced by the Victorian Planning Authority, has not triggered any major commitments or funding to implement its findings.

In 2018 Sunshine was also designated by the State as a **Priority Precinct**. The precinct has since been transferred to the Department of Transport, and the focus narrowed to Sunshine Station as a “Transport SuperHub” rather than integrated land use and transport planning for the whole precinct. Now it seems recent decisions have even shelved any significant upgrade of Sunshine or Albion stations, and no plan to integrate it with the business districts and the heritage residential communities each side of the Station.

In line with the government designation of Sunshine as a NEIC, Brimbank Council has promoted the vision of Sunshine as the “**Capital City of the West**”. However there is no supporting State strategy for how to cement that role, apart from the transport proposals. These have increasingly stepped back from the original vision of a transport SuperHub providing an interchange and helping create a local visitor economy.

Action is needed to resolve Sunshine and Albion’s planning problems and define its role against competing centres in the same corridor – Watergardens, St Albans, and Footscray – which all appear to be growing strongly. Sunshine itself is effectively four separate precincts as set out in the Sunshine Activity Centre Structure Plan 2014 and the local connections between these, in particular bus services, remain quite weak.

**Despite these prestigious designations, very little is being done to examine the entrenched planning problems of Sunshine/Albion – or to engage local residents in the planned changes to their two stations. Sunshine is seen as a “transport issue”, not as a major planning opportunity.**

***Fig 1: The Melways view: The Sunshine activity centre spreads over 5 kilometres***



## SUMMARY AND RECOMMENDATIONS

There is great disappointment that the government's rhetoric that Sunshine would become a "Transport SuperHub" looks like coming to nothing. The upgraded Metro trains to Sunbury and the Airport Rail Link will simply share the existing platforms 1 and 2. No known improvement is planned for the station until the deferred Western Rail Plan (electrification of trains to Melton and Wyndham Vale) – when it appears an additional two platforms may be built sometime in the 2030's .

There is no visible public engagement currently being done by any of the relevant government agencies – DOT, DJPR or the VPA on shaping the development of Sunshine as a designated Metropolitan level Activity Centre. Work is apparently limited to issues about the rail connections. Even the replacement of the almost derelict station at Albion is no longer on the agenda. Instead there is a proposal for a huge rail viaduct which will blight the historic Albion precinct and exacerbate the east/west split across the whole precinct.

**The comparison to the metropolitan level activity centres in the eastern suburbs – Box Hill, Ringwood, Dandenong, and Frankston – is quite stark.**

They are all far better planned, more compact, better served by public transport with major activities – businesses, universities, and hospitals – in the heart of their centres. Attracting people generates vitality and growth in services.

### Recommendations

Sunshine needs a dedicated Development Board – as has been established for Fishermans Bend - to drive integrated planning and implementation of land use and transport planning opportunities. This has worked successfully in the ACT and is needed due to the disconnected efforts of different agencies and the sole focus on transport project construction.

**There is an urgent need for a detailed implementation plan for the core of Sunshine to ensure it is properly integrated with the planned new Metro service starting in 2025 and the Airport Link planned to commence in 2029. The Development Board should:**

1. Conduct a proper public planning process to assess the options for the Airport Rail to consider the lower impact of an at grade or tunnel solution compared to the expensive and visually intrusive proposal for a 2-kilometre viaduct. These options would be more closely aligned with the Vision 2050 plans for the Albion Quarter precinct.
2. Identify the sites available for significant commercial and residential development as part of an integrated development plan to achieve the objective of creating doubling the current population of 65,500 and attracting 30,000 extra jobs.
3. Fund the necessary infrastructure to see the precinct thrive based on the previous draft VPA Plans and the Brimbank Council "***Sunshine Priority Precinct Future Vision 2050***" (developed with extensive business and community inputs over two years at the Victorian Government's request).

In support of these growth goals, there are many practical steps that can be taken to improve the transport connections whilst the major projects are being designed and built:

### **SHORT TERM UPGRADES**

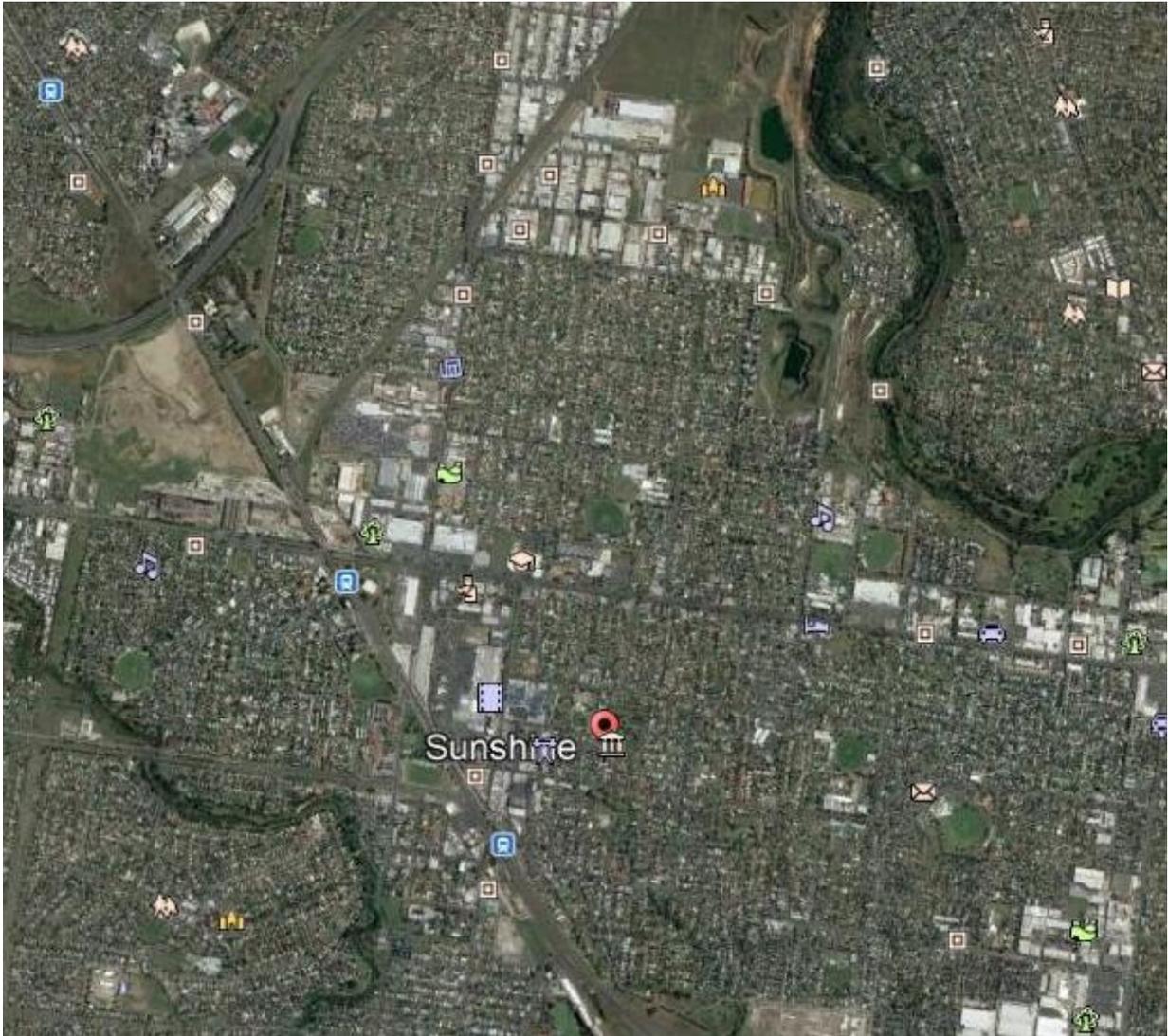
4. Upgrade the frequency of train services to every 10 minutes on the Sunbury line and every 20 minutes on the Melton and Wyndham Vale lines.
5. Greatly improve signage for wayfinding and connecting services between Metro, V/Line and bus services at Sunshine station.
6. Alter timetables so that Bendigo V/Line trains stop and do not run express through Sunshine.
7. Establish an express bus from Sunshine to the Airport to build patronage and travel patterns in advance of the ultimate Airport Rail Link in 2029.
8. Undertake a regional review of bus routes in Brimbank with a view to injecting more resources to upgrade several key services (listed below) and to extend operating hours for other routes
9. –Extend some bus routes to run the length of Hampshire Rd with one route extended to run direct to the Sunshine Hospital precinct.
10. Realign the 903 Smartbus to run from Essendon to Highpoint West and Sunshine.
11. Invest in substantial upgrades in local parks and shared paths, including the completion of the proposed green spine along the western side of the rail corridor

### **MEDIUM TERM UPGRADES**

12. Scrap the planned 2-kilometre rail viaduct and design an at-grade or tunnel solution for the junction for Airport Rail Link north of historic Albion
13. Commit to building a new Albion station, in its current location with improved exit at both the north and south end, to provide a better connection to the proposed development on the adjacent State-heritage listed John Darling Mill site and the northern part of the Sunshine CBD, where further substantial development opportunities exist.
14. Set a clear timeframe for electrification of the Melton and Wyndham Vale lines and use GAIC funding to bring forward the construction of promised additional stations on those lines to service these growth corridors.
15. Make provision for the additional two platforms required on the west side of Sunshine station after going through a detailed planning study to resolve the long-term relationship between the station and the two halves of the Sunshine CBD
16. Construct a new underpass at the north end of the Sunshine station to better connect the two halves of the CBD and promote growth in the Westside precinct.
17. Consider developing a new station at Sunshine North to service the Luma/ Sunshine North precinct between Albion and Ginifer stations.
18. Consider the development of a network of trams in the western suburbs, centred on Highpoint West and linking to Sunshine along Ballarat Rd (replacing the 220 bus)

19. Reactivate the original SRL plan for a complete loop around Melbourne, with a service from Melbourne Airport to Newport via Sunshine with stops every 2 kilometres
20. Clarify the medium-term plans for freight to access the western suburbs (in advance of the ultimate construction of the Outer Metro Ring Road and rail line)

**Fig 2: The Google Earth view: A jumble of housing, commercial and transport**



# 1. SUNSHINE AS AN ECONOMIC HUB

## Identifying the issues

**The transformation of Sunshine depends on planning it as a GO TO destination - not just as somewhere for people to GO THROUGH.**

If engineers fix their eyes only on Sunshine Station and the cheapest way to put in additional lines, planning will again fail Sunshine.

At best, this will create an isolated interchange lacking a soul as it did when the Regional Rail program put in place Station solutions that have divided and downgraded one side of the CBD area. It should be remembered that the south west side of the CBD was the place where a young naval officer - Prince Phillip - came and stayed in 1945 when visiting Melbourne as back then he felt it was a place "to have a jolly good time".

The employment opportunities recognised when designating Sunshine as a NEIC will go to waste unless land use issues and local access problems are grappled with and future development used to reshape the precinct around the two stations – Sunshine and Albion - that serve the core of Sunshine precinct. As explained below, St Albans and the Sunshine Health, Wellbeing and Education Precinct (SHWEP) should be planned as an adjacent major precinct in its own right.

Sunshine is a significant employment centre with some 30,000 jobs spread over four sub-precincts. It has 3 shopping malls, upgraded schools, surrounding residential areas scattered community facilities, open space of varying quality and recent street improvement works.

Further investment and growth will only be attracted to Sunshine if there is a commitment by government to deliver on the previous planning and provide the non-transport infrastructure needed to make a major urban centre work effectively. Victoria is badly lagging in transport-oriented development planning, commonly being given centre stage elsewhere.

In Brisbane, there are such plans for Woolloongabba, Yeerongpilly and Greater Springfield and other smaller developments which have strong links between transport and urban renewal.

In NSW, the [Sydney Future Transport Plan 2056](#) and the [Greater Sydney Region Plan: A Metropolis of Three Cities](#) were released on the same day as integrated documents. Detailed precinct development plans, based around Sydney's new Metro lines currently under construction, include Chatswood, North Sydney, Sydney Olympic, Parramatta and many other places. The overall concept is seeing Sydney as three interconnected cities, each with an internal structure built around Major Activity Centres.

The best parallel to Melbourne's Sunshine problem could be the recently released [Canterbury-Bankstown Connective City Master Plan](#). This sets out a 15-year vision for how these existing centres are to be developed as a corridor to overcome past fragmented development. This is integrated with the development of a new Metro link and shows the sort of integrated thinking needed to make the most of existing centres in Melbourne's west.

Implementing such a plan needs a Sunshine Development Board to oversee and be given the lead role to coordinate the diverse government agencies that currently dabble in the area.

A well-planned move of government departments and services - Justice, Health, Disability, Education, Transport and Employment - all sectors where significant disadvantage occurs across Melbourne's West, as well as private and not for profit sector organisations, would drive significant change and transformation. It is understood that to date VicRoads is the only local government agency in contention.

## Sunshine as the capital of Melbourne's west

Sunshine is located 11km west of Melbourne's Central business district at the meeting point of several key transport routes. Sunshine's CBD has about 70 hectares of available development land to build a 21st-century central hub,

Sunshine is one of Victoria's industrial heartlands, which developed around (and is named after) the Sunshine Harvester works, once the largest industrial complex in the Southern Hemisphere.

Today it has a range of thriving businesses to build upon, with well-developed service centres, a range of important regional institutions and a diverse local population.

Sitting at the junction of key rail and road networks, Sunshine is highly accessible and is well placed to provide major facilities to service the growth corridors to Melton, Sunbury and Wyndham. It is central to the employment precincts in western Melbourne, and close to Melbourne Airport with an existing freeway, and a proposed rail link.

The trend for decentralisation away from the CBD has been accelerated by COVID-19 which will further benefit locations like Sunshine with a wide catchment of good transport services. Having quality office space closer to where the workforce lives will prove a key population growth driver, underpinned by good housing affordability and availability. The proximity of Sunshine Hospital and Victoria University provides a strong basis for higher level services.

**However, this momentum may evaporate as the government retreats from its *Sunshine Station SuperHub* commitment and sends mixed messages about its commitment to non-transport related infrastructure to underpin the growth of Sunshine**

The Sunshine National Employment and Innovation Cluster (NEIC) is envisaged as a major jobs centre of the Western Melbourne economy. It is intended to build on a substantial array of existing business services and large institutions to become a major provider of teaching, healthcare services, medical research, education, transport, business and retail services.

The VPA produced a draft [Framework Plan for the Sunshine NEIC](#) in March 2017 – but there has been little progress on this in the last four years. There has not been a final Framework Plan released, nor has there been any funding to implement the key recommendations.

The public narrative has been dominated by the transport projects which happen to go through Sunshine. This has not been for any lack of effort by the Brimbank Council or community groups such as the Greater Sunshine Community Alliance and Albion Ardeer Community Club.

Public consultation efforts by the State have been fragmentary. There is a degree of scepticism that major changes are unlikely to happen because past big promises have not been delivered.

The VPA Sunshine draft Framework Plan boldly stated:

*The Sunshine National Employment and Innovation Cluster is proposed to become a major jobs centre of the west's new economy. It can build on a substantial array of existing business services and large institutions to become a major provider of teaching, healthcare services, medical research, education, transport, business and retail services*

**Fig 3: The VPA draft Framework Plan for Sunshine**



Source: VPA

Despite a few vague references to public transport, the VPA NEIC plan does not propose any substantive upgrades to transport within the precinct to achieve the objective of strengthening Sunshine and the surrounding areas as an employment growth zone.

As a plan it remains entirely disconnected from the current thinking that the Department of Transport is doing about Sunshine station and the various services that will run through it.

## The Brimbank Council: Sunshine Priority Precinct Vision 2050

Brimbank Council has recently released its Vision 2050 for the Sunshine Priority Precinct called *Leading with Vision: A city ready to shine*. This identifies 15 key aspirational outcomes for positive change and paints a picture of what Sunshine could look like in 2050.

The Vision statement identifies five sub-precincts around the "Sunshine CBD" with Vision statements for each. It includes St Albans as part of Sunshine but does not separately reference the Luma/Sunshine North precinct. Taking a Brimbank municipality view of the world, it does not

include the Braybrook Renewal area (in adjacent Maribyrnong) and the links to Watergardens, Highpoint West, Footscray, Deer Park and Caroline Springs are mentioned only briefly.

**The 15 Outcomes can be grouped as follows:**

***Central Sunshine***

1. A truly mixed use, vibrant Sunshine CBD
2. Sunshine super hub is an integrated development, knitting both sides of the rail corridor together, creating a true hub.
3. Sunshine CBD is an international, regional and local visitor destination.
4. Hampshire road is a civic heart that celebrates our multicultural community.

***Adjacent sub-precincts***

5. Albion quarter: the redeveloped Albion station is the catalyst for the transformation of the northern end of Sunshine CBD.
6. Sunrise district: a university city focussed on research, innovation, study and enterprise.
7. Ballarat road growth and activity corridor.
8. Sunshine Energy Park is transformed into one of the western region's premium parks.
9. The Sunshine Health, Wellbeing and Education precinct (SHWEP) is the premier location for health facilities, wellbeing and education serving the western region.

***Broader Sunshine region***

10. A 21st century zero-emissions sustainable precinct.
11. Community focussed neighbourhoods.
12. A green and cool network of waterways, parks and pathways.
13. An 'inner city' multi-modal transport network for the west.
14. A thriving St Albans community.
15. State leading circular economy, industrial and manufacturing destination.

This list omits three significant precincts, immediately adjacent to the Sunshine CBD which have major integrated development potential – the Sunshine North/ Luma precinct, the Westside of Sunshine Station (the historic centre of Sunshine) and the Braybrook Regeneration Area.

The grouping of these outcomes and the definitions of the precincts is a little unclear. In many ways the detailed descriptions overlap, which creates some confusion. The SHWEP precinct lies north of the Ring Road and is largely distinct from the Sunshine CBD and its two stations. It actually interacts more strongly with the Victoria University campus at St Albans and St Albans CBD – which collectively deserve a growth plan of their own.

The issue of the broader Sunshine region deserves a broader framework, that encompasses Watergardens, Footscray, Highpoint West, Brimbank Central and Deer Park. These centres are all interconnected and provide the choices for new developments in Melbourne's north west.

This submission looks critically at the proposals in relation to central Sunshine and its immediate precincts, which collectively could grow and merge into the sort of metropolitan activity centre that is envisaged to counterbalance Dandenong, Frankston or Box Hill in the structure of our city.

The Brimbank Council's *Sunshine Priority Precinct -Vision 2050* document was only recently released, after two years of consultation at the request of the Victorian government. The heavy

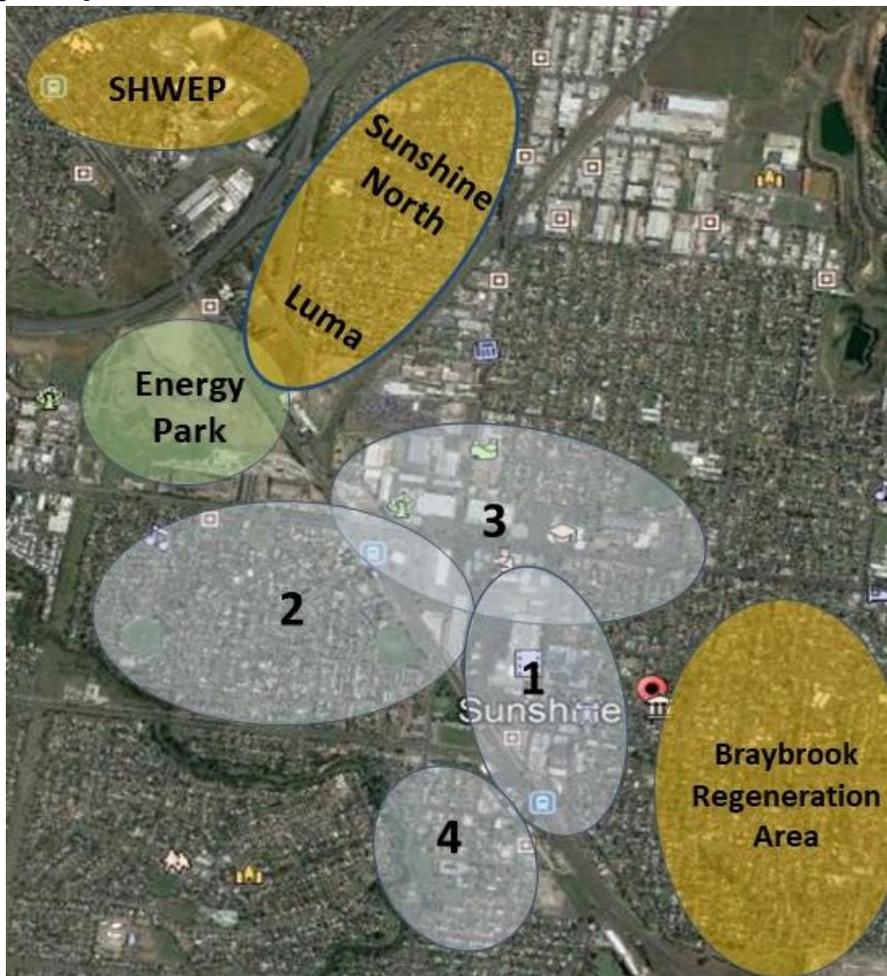
reliance on the development of a Sunshine SuperHub means that it is almost out of date before the ink has dried, because that concept appears to have been significantly watered down by the government.

It is a long-term vision – looking 30 years into the future. As a consequence many of its aspirations are very ambitious and assume a level of high-density development that is hard to see, given the current spread out structure of the precinct.

**Essentially Sunshine spreads over 70 ha – half the size of the Melbourne CBD but currently has less than 1% of the 18 million square metres of buildings that exist in central Melbourne**

Growth in Sunshine is necessary, and highly likely – but it is also important to be realistic and plan for what is feasible in the next 10 years (by the time the Airport Rail Link opens) and what the longer-term opportunities beyond that might be.

**Fig 4: The key sub-precincts around Sunshine**



- 1. Sunshine CBD (Hampshire Rd and surrounds)
- 2. Albion Quarter (station, heritage garden village and northern CBD)
- 3. Ballarat Rd / SunRise precinct (Victoria University & Justice precinct)
- 4. Westside (Old civic centre and residential area on south west side of the Station)

*Adjacent precincts*

- Sunshine Energy Park
- Sunshine Health, Wellbeing and Education precinct
- Sunshine North/ Luma
- Braybrook Regeneration Area

## 2. DEVELOPMENT PRIORITIES FOR THE NEXT FIVE YEARS

### Current developments

**Brimbank Council estimate \$160 million in new projects are built or under construction with up to \$520 million in the planning pipeline. Critically, these are dependent on a clear message from government about the future of Sunshine.**

Major projects in this pipeline include:

- The new \$52 m Council offices and \$25 m VicRoads offices which are both now occupied – with the VicRoads building now having two storeys added.
- 21,000 square metres of commercial space is either under, or has finished, construction over five CBD sites.
- 121,000 square metres of commercial space has received planning approval there over 13 different sites.
- proposals for four new hotels with 500 rooms.
- the redevelopment of the heritage John Darling Mill and silos at Albion by Pelligra Group.
- a \$25 m upgrade to the law courts and a \$35 m VU Skills hub.
- a new 15,300-square-metre office building above the shopping centre. Sunshine Plaza Corporate will include a 120-child early learning centre and a 667-car parking basement.

***Fig 5: The new Sunshine Plaza is one of several big developments planned for Sunshine.***



The VPA has made the Braybrook precinct regeneration one of its “Fast track” projects for 2021.

Development Victoria is well advanced with its Luma project, creating 300 new homes on the site of the former City West Water site, and undertaking major upgrades to Stony Creek.

Other Brimbank funded projects include a \$10 m upgrade of Hampshire Rd as a pedestrian and bus priority corridor, the \$3.5 m Sunvale Park and various other shared paths and park upgrades. It should be noted however, that the standard of open space and the extent of the bike path network is well below the standard enjoyed in eastern suburbs.

## The Sunshine CBD

The centre of Sunshine currently barely warrants the title of being a true Central Business District. The broader Priority Precinct is spread across 70 ha. The Sunshine CBD radiates off the 1.5-kilometre spine of Hampshire Rd. There are three substantial shopping centres – Sunshine Market Place and Sunshine Plaza (midway between Sunshine and Albion stations) and City West Plaza (closer to Albion). These are surrounded by car parks and mainly poor standard buildings.

Sunshine struggles to assert itself against the more compact competing shopping destinations in Footscray, Watergardens, St Albans, Brimbank Central and Altona Gate. It has so far only attracted a few office developments or medium density midrise apartments. This is in contrast to other centres a similar 11 kilometres from central Melbourne – for example Elsternwick, Caulfield, Camberwell or Heidelberg.

There are however many development opportunities. A number of permits have already been issued for substantial developments and there are numerous potential development sites, including a lot of land used for low density car parking.

The drawback is a loss of confidence in the development sector about how committed the government is to Sunshine as a major destination. The level of investor interest is directly linked to the ambition outlined in the Sunshine SuperHub announcements. The more these are downgraded, the more likely investors are to look elsewhere in the west to see growth.

A Sunshine Activity Centre Structure Plan was adopted in 2014 and there is flexibility to incorporate additional high-rise buildings that add density to the centre of the precinct. As described below, a redesign of bus routes could capitalise on the recent works to turn Hampshire Rd into a pedestrian and bus corridor, linking the different components of Sunshine.

## Albion Quarter

The importance of the Albion Precinct set out in the Sunshine Activity Centre Structure Plan as a centre for development of the northern half of the CBD cannot be underestimated. Nor can the dampening impact of a massive rail viaduct on the amenity of this precinct be dismissed. To succeed, Sunshine must overcome its poor reputation on liveability.

There is an Albion railway station, but it is very run down, including garden maintenance being undertaken only by a local 'Stationers' community initiative.

The 'jewel in the crown' historic HV McKay Memorial Gardens is, except for an ever-at-risk footbridge, cut off from the City Centre and the train stations.

The Pelligra development of the heritage John Darling Mill site could transform the western side of Albion and open up new connections into the historic Albion Village model township – creating direct linkages down to the Kororoit Creek green corridor.

A second green spine is proposed to run along the western side of the rail line, connecting the station to the Barkly Reserve, Mackay Memorial Gardens and the Chaplin Reserve - locals refer

to this is 'between the Silos', that is the south Silos and northwards to the Albion Darling Mill silos.

The Chaplin Reserve area is privately owned with a development plan but should include a green corridor through the proposed housing to provide local amenity. At present, a children's pocket park is a planned addition,

The absence of a connection from Chaplin Reserve, over the Melton line to continue the green spine further south, past the railway station to the J.R.Parsons Reserve is a significant oversight.

## Ballarat Rd/ SunRise

These are nominated as separate precincts in the Vision 2050 plan, but are essentially the one area, comprising the northern half of the CBD.

There are important people generators, including the VU campus and the justice precinct to the east, but these are disconnected from the southern half of the CBD and the bus links between the sectors are poor.

There is a significant traffic problem with the complicated intersection of St Albans Rd, Ballarat Rd and McIntyre Rd that creates congestion and a negative impression. The proposed link from St Albans Rd to Foundry Rd could greatly improve internal circulation but is at risk from the 2 km rail viaduct being planned as part of Airport Rail.

Solving the access issues, could stimulate the growth of the VU Sunshine campus and create a more unified view of the CBD as a single entity.

## Westside

The area west of Sunshine station is significantly depressed due mainly to its isolation by the rail corridors that hem it in. This was historically the active centre of Sunshine in its industrial days but many buildings have now fallen into disrepair.

The substantial area between the rail line and Kororoit Creek needs rejuvenation and has significant opportunities if the barrier between it and the CBD can be overcome. The shopping centre needs a clearer focus and more street level amenity to attract people back.

The most immediate solution would be to build a replacement underpass from the end of City Place to the bus interchange plaza on the east side of the station. This would provide far easier access and be more disability friendly than the current overpass 100 metres further south.

This precinct will be significantly impacted by the additional two tracks and platforms needed to enable the Western Rail Plan. Even though this next stage of development has been pushed off to the indefinite future, the design should be resolved now, land reserved, and the development of Westside planned around the ultimate outcome. To the extent that some properties need to be acquired, this should occur earlier rather than later.

The issue of parking needs to be addressed. Recent station developments have seen them isolated in a sea of car parking. This would be a very bad outcome for Sunshine. Every other metropolitan centre has their station closely integrated with shopping, bus and pedestrian

facilities. Car parking should get a low priority around such an important station, particularly given there are significant areas of land which are poorly utilised within 200 metres or at more appropriate stations along either line.

## Sunshine and the Regional economy

The opportunity for development at Sunshine needs to be analysed as part of the development of the western suburbs as a whole. In particular, the “connectedness” that will come from the opening of the Metro Tunnel, the Airport Rail Link and ultimately, the Western Rail plan.

**Fig 6: Sunshine in the context of surrounding centres showing the rail links**



## Nearby precincts

The VPA draft Framework Plan also identifies other sub-precincts where there are opportunities for growth. Some development is happening, although disconnected. It also drew a wide boundary, incorporating SHWEP and St Albans – realistically not a part of the Sunshine hub although definitely a part of the overall picture for development in the western suburbs.

### **St Albans**

St Albans is a significant activity centre in its own right but is too distant to be planned as part of Sunshine. It has close links with Victoria University and SHWEP and the maturing residential area of Cairnlea. It has benefitted from the recent grade separation.

### **SHWEP**

The Sunshine Health, Wellbeing and Education Precinct (SHWEP) is envisioned as an integrated health and education sub-precinct based around the Sunshine Hospital. This lies just under 1 kilometre from Ginifer station and some 4 kilometres north of Sunshine Station. However, there are both rail lines and freeway that block access between them.

The SHWEP precinct aims to be recognised as a centre for excellence in medical treatment, health research, wellbeing, training, and education. The precinct will provide for the needs of all workers, users and visitors to the precinct. Key facilities in the precinct include:

- Sunshine Public Hospital.
- The Joan Kirner Women's and Children's Hospital (2018).
- The Western Centre for Health, Research and Education (incorporating the University of Melbourne and Victoria University).
- Furlong Road level crossing removal and Ginifer Train Station redevelopment (2017)
- \$140 m Sunshine Private Hospital (complete in 2022).

The SHWEP Management Board was established in 2013 to advise Council and coordinate key institutions and the State Government.

A draft plan for the precinct was completed by the VPA in June 2018 working with close collaboration with Brimbank City Council and government agencies.

The draft plan was never completed and the SHWEP Board has since been dissolved, without the issues it identified being resolved.

This plan was intended to identify gaps in infrastructure to unlock investment and jobs and promote the precinct for training facilities, medical businesses, student and visitor accommodation, recreational trails and parklands, additional shops, cafes, and restaurants.

### ***Sunshine North/ Luma/ Sunshine Energy Park***

Development Victoria is currently developing the former City West Water site on St Albans Rd, branded as Luma Living. This part of Sunshine North lies just south of SHWEP and is sandwiched between the Western Ring Road and the Jacana rail corridor.

The development will provide approximately 300 townhouses ranging from 1 to 4 bedrooms aimed at first home buyers, key workers to support the neighbouring health and education precinct, young professionals, couples, growing families and established families.

This includes project management of the adjacent Upper Stony Creek improvement works that will upgrade a significant open space asset.

Arguably, given that Albion and Ginifer are 2.3 kilometres apart, there is scope for an additional station to service the isolated area of Luma and Sunshine North. The average distance between the 45 train stations between 10 and 15 kilometres from Southern Cross is 1.2 kilometres<sup>1</sup> – which is consistent with stations having effective walk-up distance of around 800 metres.

The area north of Stony Creek is already developed housing around the Albion North Primary School and would be easily accessible to a station at Luma. It would also benefit from the proposed increased frequency of buses direct from Sunshine to the SHWEP hospital precinct.

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<sup>1</sup> [Distances between Melbourne railway stations – a quick map | Maps by Philip Mallis](#)

## **Cairnlea**

Development Victoria is also delivering the final stage of the Cairnlea residential development, west of Ginifer. It is the site of the former Albion Explosives Factory, a Commonwealth Defence facility that operated from the early 1940s until the 1980s.

Cairnlea has been successfully remediated and developed into 3,100 residential lots with almost a third devoted to public open space and grassland reserves. It is the key urban renewal project in the Sunshine precinct.

It sits in a triangle between St Albans to the north, Brimbank Shopping Centre to the west, Deer Park to the south west and Sunshine to the south east. Cairnlea residents are dependent on having local bus services, yet there is currently only one route – the 423 running from Brimbank to St Albans via Ginifer. This only runs every 40 minutes off-peak and 20 minutes in the peak and stops at 9:00 pm – which means that anyone going out, even locally has to walk home.

## **Braybrook regeneration project**

The Victorian Planning Authority (VPA) is leading the Braybrook Regeneration Project, is one of the VPA's Key Fast track projects, as part of the COVID 19 response. This area lies just east of Sunshine and west of Footscray and Highpoint West but is not well linked to these centres.

The Braybrook and Sunshine area have been a natural community of interest for many decades with new local government boundaries only recently creating artificial municipal boundaries on maps that do not exist in reality. There is considerable potential for redevelopment of existing poor-quality housing and for increasing densification. However, attracting new residents depends on upgrading local facilities and transport services through this precinct.

**Fig 7: The Braybrook regeneration area – east of Sunshine**



This project includes the preparation of an Urban Design Framework (UDF) to support the regeneration of the Braybrook area south of Ballarat Road. It aims to:

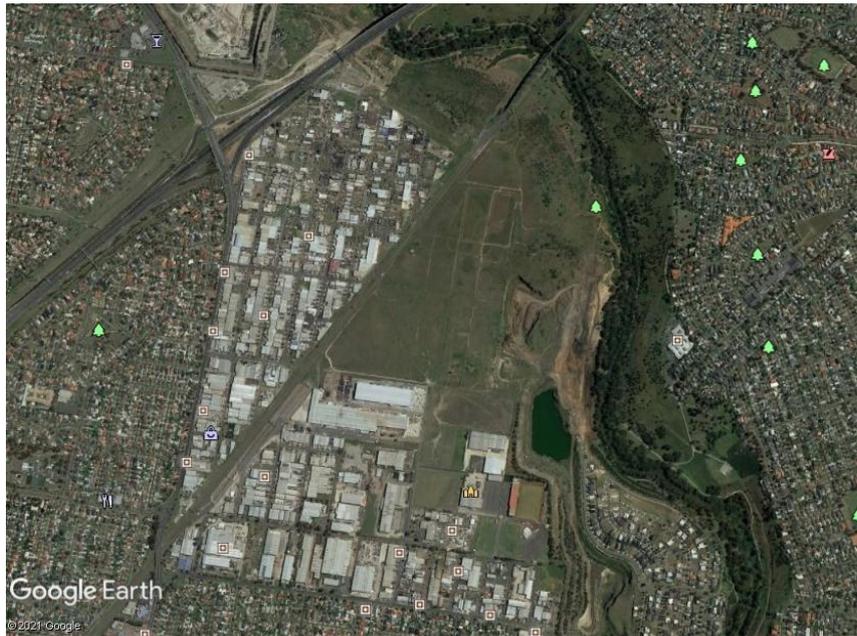
- provide greater diversity of housing options.
- ensure future growth contributes to an attractive neighbourhood with a strong sense of community.
- enhance local centres and community services.
- improve active transport and public transport options.
- enhance street tree planting and create better public open space.

### **Solomon Heights**

VPA also identified the Solomon Heights area as a significant opportunity for development of new commercial activities to increase local employment. This undeveloped area lies south of the Jacana rail corridor on land above the Maribyrnong River valley.

It is industrially zoned and was subdivided in the 1920's; but several issues made it unattractive. The area includes some endangered species, which need protection by addition to the Maribyrnong Valley Parklands. Development is unlikely until this issue is resolved as Supreme Court action saw the area's future development directed to private interests.

**Fig 8: Solomon Heights – north of Sunshine**



The concept of the Melbourne Airport Rail Link (MARL) depends on express services to provide a reasonable travel time into the city. MARL is therefore less suited to having local stops – such as might otherwise be contemplated at Solomon Heights and Sunshine North (McIntyre Rd).

There is an active debate urging the government to include a MARL stop at Keilor East (on the other side of the Maribyrnong River) and/ or to change the alignment to make a stop at Airport West possible. Neither of these changes seem likely given the government's statements.

However, the Suburban Rail Loop western leg should provide stops at all four locations to connect this whole sector of north west Melbourne to Broadmeadows and all points east.

The government seems to be backtracking from its original commitment that SRL would be a complete loop around Melbourne. It is now saying that the MARL and the Wyndham Vale electrification will "substitute for the Western leg of the SRL". Both of these are radial rail services and not part of a true orbital line (such as the London Overground). The lack of local stops would also severely limit the usefulness of such an arrangement – particularly as it would take two changes of train to get from Broadmeadows to Deer Park or points west of that.

MARL planning here represents a very narrow view and ignores opportunities for substantial development along the corridor as part of the Sunshine NEIC supported by a true western SRL.

### 3. SIX TRANSPORT UPGRADES NEEDED BEFORE METRO

#### Existing services have poor frequency

Sunshine already has a number of train and bus services mostly only operating every 20 minutes. However, unlike the Dandenong and Frankston corridors nothing runs every 10 minutes outside of peak hours. There are a few bus routes such as the 216, 220 and 410 that run every 15 minutes on weekdays and as infrequently as hourly on weekends.

The 903 SmartBus is the highest profile route but its 30-minute weekend frequency and less useful destinations make its benefits less than they should be. However, it is the only route that travels both sides of central Sunshine in a pattern that should be replicated more widely.

**Fig 9: Sunshine currently has NO 10 minute “turn up and go” public transport routes**



#### 1. Improving train services

There are several improvements to train services that could easily be made without having to wait for the opening of the Metro Tunnel and future planned changes to operations.

The Sunbury line upgrades to support more frequent trains are well advanced and not dependent on the tunnel completion.

##### **Sunshine Station rebuilding and revamp.**

Sunshine station was substantially rebuilt as part of the Regional Rail Link project. It comprises two electrified platforms for Sunbury and Bendigo services and two non-electrified platforms for Melton, Wyndham Vale, Geelong, and Ballarat services.

There is a modern concourse connecting the platforms, but also serving as the only link between the east and west sides of the rail corridor. It can therefore get congested at busy times with pedestrian movements, many of which are unrelated to train services. A new underpass (replacing one that was filled in) is a key upgrade that is required. Local walking and biking connectivity in the area remains poor, and signage at the interchange is poor – both for

wayfinding within the station and advice on the next trains and bus services. Directions to the right bus bay are confusing.

There are separate indicators for Metro and V/Line trains – despite the fact that Sunshine is the key interchange between these networks for people not going to the Melbourne CBD. For unexplained reasons, Bendigo V/Line trains currently run express through Sunshine. This could be easily changed to improve connections right now.

The west side of the station has huge development potential if connectivity was better (after making provision for future expansion of the station).

Multiple entrances and connecting walkways, at both ends of the platform, are essential to maximise walking catchment. Escalators and lifts need to be added to cater for expanded patronage. The options for a better design are discussed in detail below. As there are no major changes proposed for Airport Rail Link services, the improvements to Sunshine do not have to wait another eight years.

### **Albion Station upgrade.**

Currently the station is in a very poor state, the north end of the platform has literally collapsed and is fenced off. The exit tunnel to the north is narrow and in poor repair, leading out to two car parks and a distant bus stop. Albion station is surrounded by car parks and hemmed in by the junction of Ballarat and St Albans Rds.

However, the precinct has significant development potential, including a current major planned redevelopment of the State-heritage listed John Darling mill. The car parks have great potential for development, although the current plan for the Airport Rail Link to pass above Albion on a 25-metre-high viaduct would permanently scar the local amenity and deter any investment.

The proposed viaduct proposal will apparently leave Albion station, fairly much in its current state. There is much local pressure for a new station closely resembling the Vision 2050 developed over 2 years of community consultation to be part of the planning – but this will only be in eight years' time and there are various options for where it might be located. This should not stop short term measures to repair the existing station, improve amenity and provide better waiting conditions for those using connecting Ballarat Rd buses.

Any new station should have an additional southern entrance and connection onto Foundry Rd to make Albion a second station for the Sunshine CBD. The northern exit should connect more directly to Ballarat Rd buses.

### **Metro Trains every 10 minutes to Watergardens.**

Currently, off-peak trains as far as Watergardens are only every 20 minutes (day), 30 minutes (night) and 40 minutes (Sunday morning). They only run to Sunbury every 40 minutes. These poor frequencies mean waiting time can exceed travel time for many trips.

The service frequency should match what the Frankston line has had for several years, i.e. a 10-minute daytime (Mon – Sun) service with a 20-min maximum wait early morning and at night. Establishing this frequency in the near future, would encourage people back to public transport

and develop travel patterns to build patronage before the Metro Rail Tunnel opens. This would be a strong message to support growth of the Sunshine CBD and other centres on the corridor.

**V/Line trains every 20 minutes to Wyndham Vale.**

Current waiting times can blow out to as much as 40 minutes at night and on weekends.

There is no timetable for delivery of the Western Rail Plan, which includes the electrification of the line to Wyndham Vale (shared with Geelong express services). Given the government’s commitments to the Metro Rail Tunnel, MARL and SRL – this plan sits at the back of a long queue – and conflicts with the commitment for much faster trains to Geelong.

The first upgrade should add services so that waiting for a train to Wyndham Vale never exceeds 20 minutes. This can be achieved operationally by building the promised station at Black Forest Road with three platforms to enable the turnaround of Wyndham Vale trains, without slowing the Geelong trains.

Significant funds have been collected in Growth Area Infrastructure Contributions from developments in northern Wyndham and Melton– and half these funds are dedicated to public transport upgrades – including funding new stations, (such as the GAIC funded Cobblebank station on the Melton line). Unfortunately, very little of the GAIC funding has been spent. DOT intends that additional promised stations at Truganina, Tarneit West and Sayers Rd will have to wait until electrification, apparently because of conflicts with Geelong express trains.

**V/Line trains every 20 minutes to Melton.**

The January 2021 timetable added many trips to Melton to take advantage of completion of track duplication and the opening of Cobblebank station. However, some long gaps remain, and weekend service is not good.

Melton V/Line trains should run at 20-minute intervals during the day and 40-minute intervals for weekend and evening service. This will enable Ballarat trains to run express from Melton to Sunshine, improving their travel time. Unfortunately, the January 2021 timetable did the opposite with almost all Ballarat trains now slowed to stop at all stations, including Deer Park, which is also served by frequent Geelong trains. Additional stations at Mt Atkinson and Paynes Rd are also destined to wait until electrification and quadruplication of tracks from Caroline Springs junction to Sunshine. This will also trigger need for another two platforms at Sunshine with two new electrified tracks to the city. (See Western Rail plan below)

**Fig 10: Confusing Sunshine station bus directory – you need to know your bus number first**

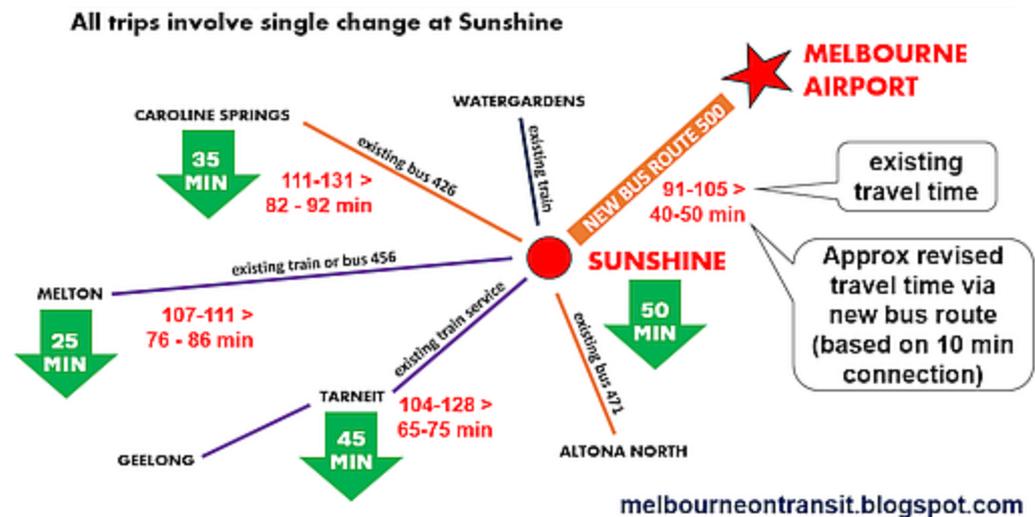


## 2. Route 500 Sunshine to Airport SmartBus.

The Airport Rail Link won't open until 2029. A better connection does not have to wait for eight years. A high-quality limited stops fast bus should be established now to establish travel patterns early and increases the attractiveness of Sunshine as a destination for business.

This service would slash airport travel times for a large slice of western Melbourne including the fast-growing Wyndham, Melton and Geelong areas with connections from regional trains.

**Fig 11: Time savings available with an Express Airport Bus**



VTAG has produced a detailed proposal for the Route 500 bus, arguing that the cost of providing it should be considered part of the "early works" for MARL. Given that MARL has an \$8-13 billion budget, the estimated cost of a net \$10 million a year to provide the bus service is very minor.

The 40-to-50-minute bus travel time estimate from Sunshine is conservative and is higher than the longest car travel time indicated above. It could be more during peak times but is likely to be less at most other times. The Airport bus works best as an express, but this doesn't preclude a stop in SHWEP, Airport West and the industry on the perimeter of the Airport. This service might continue as a local feeder after the MARL opens in 2029.

The original western leg of the Green SmartBus was proposed to provide such a connection. The current Western Skybus is high cost (\$22.50); only serves three stops in Wyndham and has poor frequency. It does not serve the function of the SRL and does not connect to Sunshine.

### 3. Creating an effective bus network

Sunshine currently has a significant number of bus services which mostly come to a single point at Sunshine station. However, the frequency is poor and the routes sometimes indirect. In particular the routes do not suit the dispersed nature of the Sunshine CBD or take advantage of the way Hampshire Rd has been upgraded to give preference to pedestrians and buses.

**Fig 12: Current bus routes serving Sunshine**



*Note the inset showing the tight concentration of routes at Sunshine Station from the west and the limited connections to the core of Sunshine, the shopping centres and the University.*

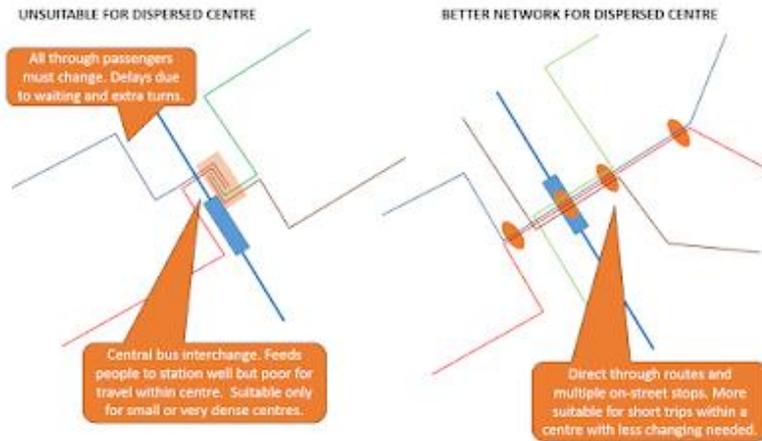
NEICs such as Sunshine are more spread out and require services that link through the area, rather than going to a single point, such as just a bus interchange at a station. Whilst it is important to have easy access from the bus interchange to the station, there is a more effective way to connect the precinct.

The core of Sunshine needs to be better connected with routes that travel through the area without simply running into a terminal. This avoids the need for many passengers to take two buses to get to their destination or to sit waiting for the bus to leave the interchange.

Ideally, routes should be paired up or extend into surrounding areas where more intensive residential development can support the cluster's employment and other functions.

The theory is illustrated in the following diagram, which shows the advantages of more direct, through routes, particularly where the centre is dispersed.

**Fig 13: Bus routes should serve multiple stops within a dispersed centre like Sunshine**

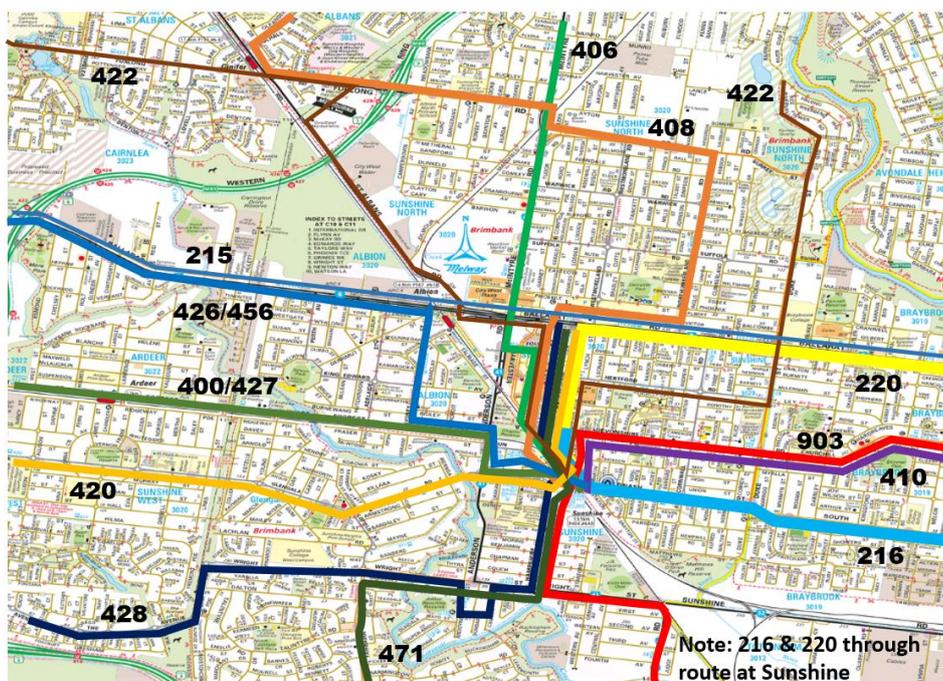


A network of direct and turn-up-and-go routes with easy interchange between them. By directing several routes to travel this “core section”, this will provide an effective frequency of less than 5 minutes between buses (e.g. station to shopping centre or University). This is how Swanston St works in Melbourne’s CBD and should be the basis for a Sunshine bus redesign.

Currently, there are 15 routes that terminate at Sunshine Station, but only 3 that travel up Hampshire Rd. Moving the bus layover to near Victoria University would immediately provide a strong public transport core route linking key parts of the precinct.

The following diagram illustrates how by pairing bus services and simplifying routes, a stronger network can be created which links the different parts of Sunshine and has more frequent, direct services to SHWEP and St Albans.

**Fig 14: Example of how the Sunshine bus network could be restructured**



The thickest lines are routes running every 10 min, medium lines every 20 min and the fine line route would run every 30 or 40 min. There would be buses every minute down Hampshire Rd.

## 4. Local bus network reform and simplification.

There needs to be a regional review of bus routes in Brimbank to develop such a plan for a comprehensive restructure of routes. This would need an injection of more resources but it would also make much better use of the existing routes. The objective would be to upgrade current services and to extend operating hours for other routes – particularly at night and weekends.

Potential upgrades to deliver more frequent services include:

- **Route 216 Sunshine to City** (*via South Rd and Footscray*)  
Upgrade to every 10 min weekday, 20 min night and weekends. Extend to Victoria University to provide more destination options for travellers.
- **Route 220 Ballarat Rd. Megabus**  
There are several bus routes along Ballarat Rd., but none have the high frequency and profile needed. Ballarat Rd is home to the Footscray and Albion campuses of Victoria University campuses and the new Footscray Hospital. Also the corridor's main routes  
The MegaBus would deliver a single simple route with an all-day 5–10-minute frequency between Sunshine, Ballarat Rd, Footscray, Docklands and the CBD. It would have high quality stops and bus priority. Ultimately it could be upgraded to light rail. This is part of the Brimbank 2050 vision– but potentially needed much earlier.
- **Route 410 Sunshine to Footscray** (*via Churchill Avenue*)  
Reroute off Ballarat Rd to operate consistently operate via Churchill Av (currently 410 follows an inconsistent route with an hourly deviation). Operate a consistent 15 min peak/20 min off-peak 7-day service with longer hours.
- **Route 426 Caroline Springs to Sunshine**  
Upgrade to every 15 minutes to Caroline Springs Town Centre. This would provide a simpler Ballarat Rd service connecting with trains at Albion. Potential for a SmartBus route, merging with Route 410 to provide east-west route through Sunshine.
- **Route 408 St Albans to Highpoint via SHWEP and Sunshine**  
Upgrade with longer hours and Sunday upgrade to every 20 minutes. Would improve access to Sunshine Hospital. Potential western extension along Furlong Rd to Brimbank SC for improved hospital access in conjunction with other network changes.
- **New Watergardens – Sunshine route** (*via Sunshine Ave and McIntyre Rd*).  
Formed by extending Route 419 to Sunshine with Route 406 extended west to St Albans to serve Main St East. Would operate every 20 min or better 7 days and better connect Sunshine with close in areas to the north.

These are all modest cost upgrades which can be implemented independently of waiting for the Metro Rail Tunnel opening. They mainly utilise existing bus resources but make better use of them and provide more direct connections to key destinations.

## 5. SmartBus to Highpoint, Essendon, and the Eastern suburbs.

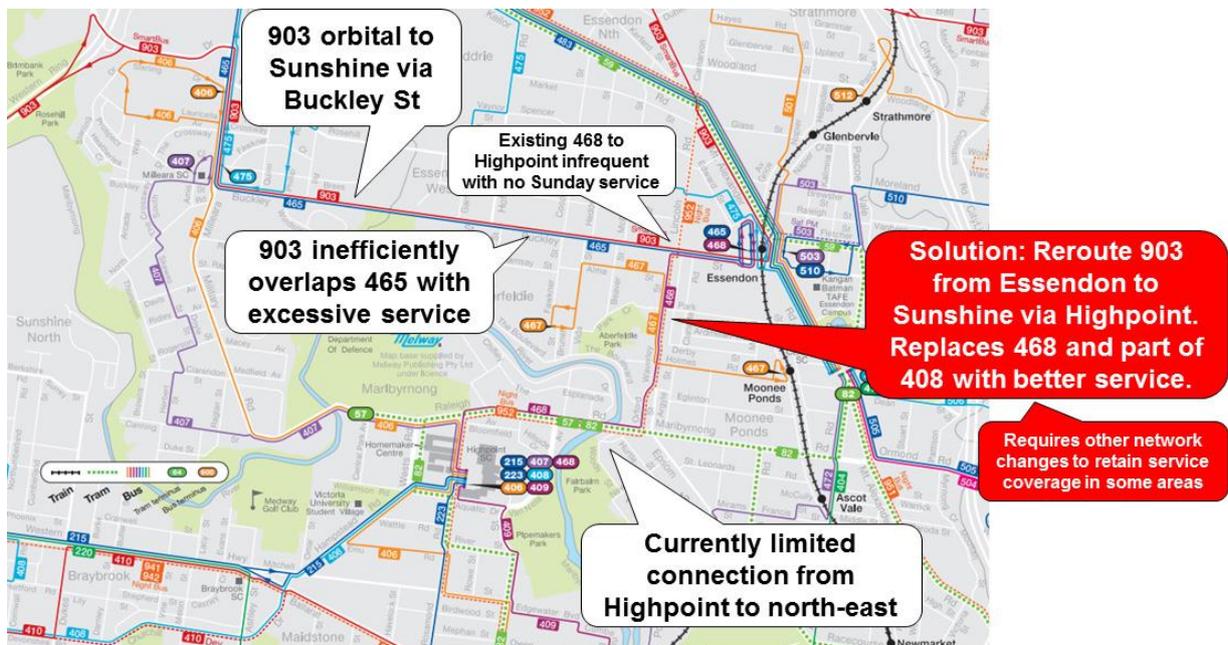
Rerouting the 903 orbital to run via Highpoint would provide a high-quality link from Sunshine to Highpoint and Essendon via Braybrook, better connecting local activity centres. The cost of doing this is negligible but there would need to be some complementary local bus reforms.

The current route partly runs on the Western Ring Road and is not the best alignment for interconnecting major activity centres. The proposed alternative is shorter and likely to attract higher patronage

Several simple variations to bus routes could significantly improve the orbital route network in advance of the western section of the Suburban Rail loop:

- Re-route the 903 Orbital bus via Highpoint to link it to the northern suburbs (and make some consequential adjustments to other local buses in the area to maintain coverage)
- Upgrade the overcrowded 220 bus to SmartBus frequency and increase peak services

**Fig 15: Realigning the 903 Smart Bus to improve north to western suburbs connections**



These rearrangements would largely use existing bus resources – with additional funding needed to upgrade the 220 to Smartbus standards. It could take some time to plan as part of an overall area bus network reorganisation.

**However, the benefits for passengers would be substantial and the cost modest.**

## 6. Walking and cycling access improvements.

Major parts of Sunshine are not realistically walkable from their closest stations for a significant part of the community (older, disability, children etc). Many facilities are a kilometre apart and an unattractive hike, often through carparks and across busy streets.

- Sunshine Marketplace; 600 metres from Sunshine and 900 metres from Albion
- Victoria University campus; 900 metres from Albion
- Sunshine Hospital, 800 metres from Ginifer Station.

The Glengala residential precinct in Sunshine West was one of three pilots undertaken as part of Plan Melbourne, to assess the 20-Minute neighbourhood concept. The study in 2018 produced a **Walkability Assessment Report** which identified numerous local options and provided the Brimbank Council with preliminary recommendations.

Brimbank Council is improving pedestrian and cycling access to town centres to encourage walking and cycling. The prime example is the wide footpaths, artworks and traffic calming measures along Hampshire Rd which are creating a much more appealing central spine.

**Fig 16: Pedestrian upgrade in Hampshire Rd**



Yet significantly more investment is needed to entice more people to cycle as an alternative to driving. Brimbank Council is advocating for:

- Victorian Government investment to build safe, well-lit off road cycle paths.
- Connecting the missing links between key cycle routes within Brimbank.
- More bicycle parking at railway stations and town centres.
- Completion of the east-west link along the rail line from Sunshine to Derrimut.
- Completion of a cycleway along St Albans Road, from Sunshine to Watergardens.

Local bike advocacy group BrimBUG also echoes these concerns, but also notes that a number of the Council recent works also do not fully connect, including the new Hampshire Road works. Importantly also, BrimBUG advocates for the inclusion of a bike route along the Airport Rail route, including the proposed major bridges. It should be made quite possible to cycle to the Airport in the future, as is not unusual in other countries.

## 4. SUNSHINE AS A FUTURE TRANSPORT HUB

### Failure to comply with the Transport Integration Act

The process for planning for new rail facilities in Victoria has been shrouded in secrecy. Announcements are made, it appears, after all the key decisions have been taken. The public are ignored until the very end when consultation is limited to the design of artwork and placement of open space facilities.

This is a sharp conflict with the actual requirements of the *Transport Integration Act 2010*.

In Part 2 the Act spells out the objectives for transport planning as:

- Social and economic inclusion
- Economic prosperity
- Environmental sustainability
- Integration of transport and land use
- Efficiency, coordination, and reliability
- Safety and health and wellbeing

In Division 3 it goes further to spell out the principles for decision making as including integrated decision making, triple bottom line assessment and equity

The principle of stakeholder engagement and community participation is defined in s20 as:

- (a) considering the interests of stakeholders, including transport system users and members of the local community.
- (b) adopting appropriate processes for stakeholder engagement.

These objectives and decision making principles seem to count for nothing in the way that the Sunshine related projects are being pursued without proper consultation, without an integrated approach and disregarding the dramatic negative impacts on Sunshine of the proposed design.

Even transport integration requirements are being ignored notwithstanding the obvious need for road improvements in Albion which are bypassed by the proposed viaduct.

All of this is being done in the absence of a proper Transport Plan . Section 63 of the TIA puts an explicit obligation on the government to periodically prepare such a Plan.

## 4.1 Sunshine after the Metro Rail Tunnel (2025-2029)

**Despite the expectations created by talk of a Transport Superhub there are proposed to be minimal changes to Sunshine station when the new Metro Rail Tunnel opens in 2025.**

By 2022, Sunshine will see platforms 1 and 2 extended to the south and works on the overall Sunbury line to upgrade power and signalling. The \$2 billion Sunbury line upgrade is currently being delivered without any clear statement of whether this will result in any upgrades in services prior to 2025.

Once the Metro tunnel is complete in 2025, new trains in the form of the longer High Capacity Metro Trains (HCMTs) will travel from the Sunbury line via the 5 new stations and connect to Pakenham and Cranbourne, instead of the route around the City Loop. It is likely these services will be subject to significant disruptions as the Airport Rail link is built.

Until the Airport Rail Link commences in 2029, it is understood there will be 6 trains an hour off peak through the Metro Rail Tunnel. In the east these will come 3 from Pakenham and 3 from Cranbourne (giving both a 20-minute frequency, as is currently the case). These will go 6 to Watergardens (with 3 continuing to Sunbury).

In the peak hours, 12 trains per hour will originate from Pakenham and Cranbourne (giving both a 10-minute frequency and run through to Watergardens and Sunbury. All services will share Platforms 1 and 2 at Sunshine and from a commuter perspective the only change will be in the destination displays.

**Section 3 above, lists the many things that should be done in the lead up to improve train and bus services and provide the stimulus for growth in the heart of Sunshine.**

There are also modest upgrades to the Sunshine station that could be undertaken prior to the Metro opening. The most significant would be a new underpass at the northern end connecting the bus interchange to City Place which would increase capacity and reconnect the east and west of the station.

Constructing the escalators (dropped from the RRL design at the last minute) and revamping the wayfinding and signage would be simple improvements that could be delivered sooner than 2025. Currently the V/Line trains to Melton, Geelong, Ballarat, and Bendigo use a different system for departure information than the metro trains – making it difficult to change trains.

An alternative concept suggested by some could be to extend Sunshine platforms (1 and 2) northwards by 150 metres and construct a second concourse with direct links to Hampshire Rd and Chaplin Reserve. This would bring the station access closer to the major shopping centre and provide more pedestrian friendly access.

However, it would not connect to the V/Line trains on Platform 3 and 4 or the long term plan for two additional platforms under the Western Rail plan (which are likely to be further south).

## 4.2 Sunshine after the Melbourne Airport Rail Link (2029)

Once the Airport Rail Link is complete, it is understood the trains that previously turned around at the specially built platform at West Footscray, will continue to the Airport – giving a 10-minute frequency service and a capacity of 9,000 passengers an hour with the new HCMT trains.

These will continue to use Platforms 1 and 2 which will have up to 18 trains an hour in the peak (3.3-minute headways) and 12 an hour off peak (5-minute headways). Off-peak, the Airport will be the destination for half of the trains on Platform 1 and 2 with the other half going to Watergardens and Sunbury.

There will, however, be more V/Line passengers seeking to change at Sunshine moving from Platforms 1 and 2. Given most will be dragging luggage, the existing lifts may prove insufficient.

The MARL trains will be the standard HCMT trains, which have a different seating configuration to the current Alstom and Siemens trains with more standing area – a problem for Airport travellers. In addition there will be no special provision for luggage.

It is expected the Airport trains will run express to Sunshine and Footscray and then stop at all stations. Sunbury trains will serve the other stations – meaning a change is needed for other western suburbs travellers heading to the Airport

The MARL website says all trains will service 31 stations – seemingly all stations east of Caulfield on the Cranbourne and Pakenham lines – implying there will be no special expresses to reduce the length of the journey and every eastern suburb station will have direct access.

VTAG has previously proposed that MARL trains should have purpose designed layouts and run express to Caulfield and terminate. This could be made possible by a new concourse and fifth platform to enable travellers to make interchange connections. This would make much more efficient use of the special trains and involve an extra change for a small proportion of travellers.

### ***Budget cuts***

The latest cost estimate for MARL is between \$8 billion and \$13 billion.

This is a 50% variation – and somewhat surprising given the original costing for a full project, - including purpose-built trains and a tunnel from Sunshine to the City was \$10 billion.

### **It appears “half a project” will cost up to 30% more than the original.**

This is surprising given that the previous planned expenditures on the Sunshine SuperHub have been axed and the dismal Albion station has been ruled “out of scope” for the MARL and will not be rebuilt (unlike many other stations impacted by Level Crossing Removal projects).

### 4.3 The proposed Albion viaduct

The concept of building an Airport Rail Line has long had wide public support but the final plan has been developed within government without any process for public involvement.

The most egregious aspect is of course the massive proposed twin viaduct over Albion. This will be around 25 metres high – twice the height of the Caulfield- Oakleigh Skyrail

Some design concepts for MARL have been released, but there is yet to be full scrutiny of the proposal. No announcement has been made about whether there will be an environmental effects statement or even a public panel hearing on the design.

At this stage, a pair of new viaducts, two kilometres long, are proposed which will start north of the H.V.McKay footbridge and rise 25 metres to pass above the Ballarat Rd and St Albans Rd. rail overpasses before joining the Jacana corridor after McIntyre Rd.

***Fig 17: Concept diagram of the viaducts above Albion station (looking south to Sunshine) compared to the same view in the Brimbank Council Sunshine Vision 2050 plan***



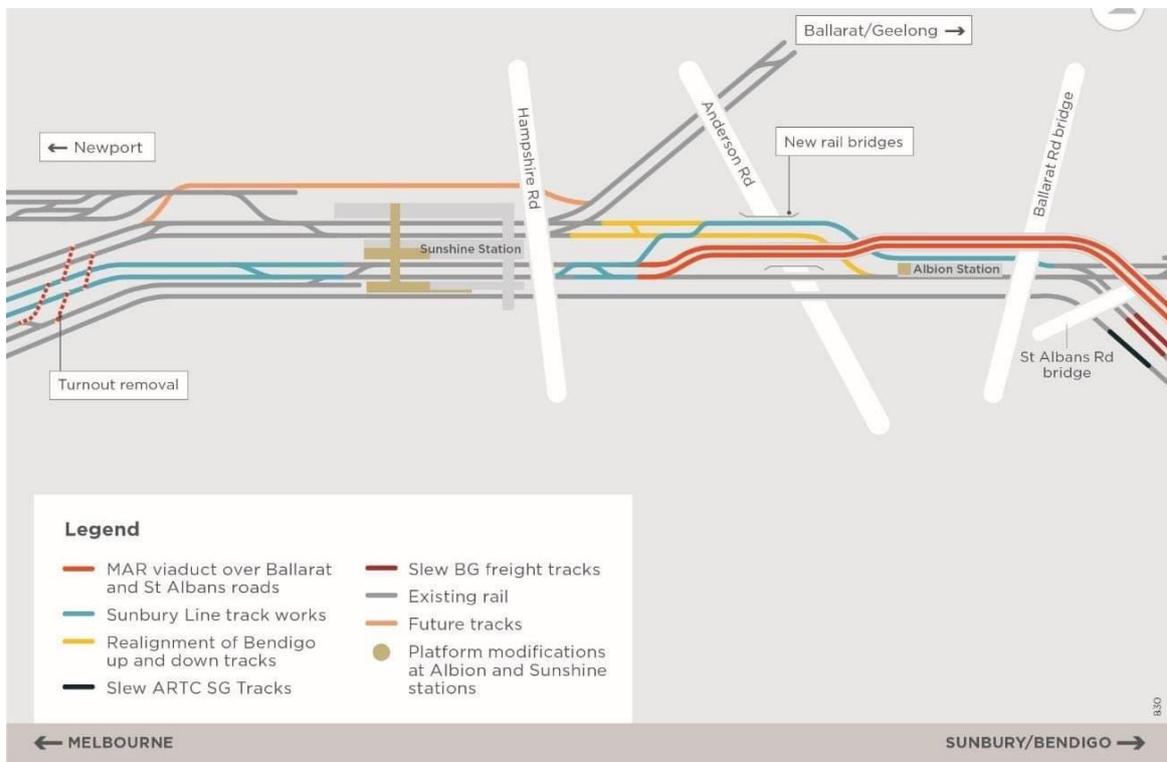
Whilst the original Skyrail from Caulfield to Oakleigh was eventually well received, the less attractive design of the Coburg version has been more controversial.

In the case of Sunshine, there will be no offsetting benefit as the rail corridor will remain at ground level and there will be less, rather than more open space after the project and no additional opportunities to link the two sides of Sunshine. Because the viaduct will also pass above the two road overpasses it will be very high and a major blot on the landscape of this historic Albion neighbourhood, particularly the heritage precinct at John Darling Mill.

There will also be two additional tracks constructed from Sunshine Station to just before Albion to enable the Bendigo V/Line trains to bypass the section of tracks shared with MARL (This means that they still have to share tracks with 12 peak period Watergardens/Sunbury trains and six off-peak trains per hour from Albion onwards).

There is a track diagram included in recently released tender documents that show the proposed configuration. This confirms the minimal change for Sunshine and Albion stations. It does indicate how the proposed additional tracks for the Western Rail plan will be located on western side with presumably two additional platforms and the southern concourse shown on the plan. The diagram can be interpreted as providing for a standard gauge platform on the east side – but DOT has previously ruled this out.

**Figure 18 Proposed track configuration for the viaduct option**



The previous provision for a future grade separation of the Melton and Bendigo RRL tracks appears to have been dropped and broad-gauge freight links into Tottenham are to be removed. This is a narrow short-term design dependent on a massive viaduct that disregards its surroundings. The rail corridor already has room for additional tracks, and it is seriously doubted that the viaduct proposal is the best long-term solution – and may not even be the cheapest.

## **There needs to be a proper public process to assess the alternatives available:**

### **1. An at grade solution**

A flyover could be built between the H.V.MacKay footbridge and Albion to separate the Sunbury trains from the MARL trains and merge them with the extended RRL tracks on the west side of the corridor. This would facilitate a new Albion station, integrated with the adjacent heritage development with a modern concourse over the tracks to the east, to link into the north of the CBD

This gap between the H.V.McKay footbridge and the extended station is 700 metres in length. The flyover could be similar to the existing RRL flyover east of Footscray, which is only 400 metres long and 10 metres high. Such a flyover would be a quarter the length and half the height of the proposed viaduct. It would avoid any visual impact on the Albion station precinct, with the new station built at grade, just west of the current location.

The MARL tracks will continue at grade and can easily pass below modified overpasses at St Albans and McIntyre Rds., if necessary, lowering the tracks. The argument that it would be "too disruptive" to undertake roadworks on these roads does not stack up when the high cost of a viaduct is put against it. There are many situations in the Big Build where road bridges have been built or altered with a few short periods of disruption.

**The disruption that would be caused by the viaduct would be permanent – blighting the area and killing any prospect of development.**

The argument about the alignment of the oil pipeline in the Jacana corridor needs to be spelt out and investigated. It may not actually be a restricting factor at this point.

### **2. A tunnel solution**

If there are complications with the above option, then a short tunnel could be designed to take the outbound MARL tracks under the inbound Sunbury line immediately north of Albion station and under St Albans Rd before returning to at grade. This option would have nil visual impact.

This would be a distance of some 500 metres allowing a cut and cover tunnel at 10 metres depth with 2% grades. The additional tracks for V/Line trains would extend to north of the Albion junction and then straight merge with the Sunbury electrified tracks.

There may be a future need for grade separation of the V/Line tracks at Sunshine junction, but it is not apparently a priority at this stage.

**It is hard to imagine that either of these options is more expensive than a 2-kilometre viaduct and the reasons given for them being rejected have not been disclosed.**

## 4.4 Sunshine North to the Airport

Beyond McIntyre Rd, the MARL will run at grade alongside the existing Jacana freight tracks. This should be relatively easy to achieve. The main drawback, being that it makes this corridor even more of a barrier for the adjoining suburbs. There is only one road over the rail line and two at-grade pedestrian crossings – effectively cutting Sunshine North into two parts.

The extra bridge across the Maribyrnong is a given and is a less contentious part of the proposal, except for the proposed exclusion of walking or cycling access.

The major works needed are a 550-metre-long rail bridge 50 metres above the Maribyrnong River (parallel to the existing bridge) and a flyover of the freeway at Airport West

**Fig 19: Concept design for the Maribyrnong Bridge, north of the existing tracks**



The MARL follows the reserved corridor into the Airport to a still undisclosed location for the Airport station. Again there is no public discussion about where the station will end up. It is quite possible that a substandard outcome might be reached on financial grounds. One only has to compare the inconvenient Brisbane Airport station with the eminently accessible Sydney pair of stations to see what a difference good design and integration with airport terminals can achieve.

### *Keilor East station*

The planning scheme makes provision for an additional station at Keilor East (immediately north of the Calder Freeway interchange). However it seems the government is resistant to this being built in a location with limited development potential and in direct competition with the nearby Airport West Activity centre (unfortunately not located on the MARL route).

## 4.5 Sunshine and the Western Rail Plan

The Western Rail Plan was announced in October 2018 , proposing a complete overhaul of the public transport network, west of Melbourne. It was to include:

- Electrification of the metro lines to Melton and Wyndham Vale with possible new stations, with the Wyndham Vale line becoming the western section of the Suburban Rail Loop.
- the full separation of regional and metro services on the Geelong and Ballarat lines – to run express fast trains including the potential full electrification of these lines.
- Additional tracks between Sunshine and the CBD to run extra services, most likely through a new rail tunnel which would also be utilised by Airport-bound trains.

\$130 million was allocated by the State and Federal Governments -just to cover the cost of planning. This plan was to be completed by 2021 and construction to start in 2023. No results of the planning have been released and the total cost and commencement date are unknown.

Sadly, it appears the whole Western Rail Plan has been shelved for now. Apparently, it will now be considered in conjunction with the \$2 billion project for faster trains to Geelong. The timetable and the implications for electrification to Melton and Wyndham Vale are unknown.

Electrification to Melton and Wyndham Vale, the additional stations and the required quadruplication from Caroline Springs has been put on the back burner. This is a major disappointment. It is unclear in what form the Western Rail Plan and the renewed commitments for a Fast Train to Geelong will now take.

**The development of Sunshine station precinct should be designed to include these additional lines, so they be implemented when funding is available.**

Most significantly, this requires provision to be made for an additional two platforms at Sunshine to accommodate the new electric trains to Melton and Wyndham Vale. It is understood the preferred plan is to build these platforms on the south-west side of the station, a little closer to Melbourne.

**It is presumed this design will deliver a new southern concourse for access to the other four platforms and improved linkages from north to south across the rail corridor.**

The additional pair of Melton/ Wyndham Vale tracks will need a corridor to run from Sunshine to West Footscray, and a new tunnel from there to North Melbourne or Southern Cross. Another possible route is to electrify two broad gauge lines from Sunshine to Newport and link this into the proposed Melbourne Metro 2 tunnel from Newport to Southern Cross via Fishermans Bend.

Given the MARL design now being proposed (which cuts off options envisaged as recently as 2018) it is important to resolve this issue of “what comes next” as part of the assessment of the MARL project. Reservations need to be put in place to ensure the growth of Sunshine does not further limit a good solution in future – and conversely that the development of Sunshine is not held back by uncertainty as transport engineers keep their options open.

## 4.6 Sunshine and the Suburban Rail Loop

There is a lot of confusion about MARL and the SRL. The government has backtracked to say that MARL and the Western Rail Plan will “deliver the SRL in the west”. By implication, the SRL will only run in the east and north and terminate at the Airport (which is why a third Airport platform is apparently required).

Government statements have also clarified that the SRL will be of radically different technology to conventional heavy rail being used for MARL and the Metro Tunnel with shorter trains (probably driverless) running at frequent intervals. It was also recently inferred that SRL tracks would be standard gauge in lieu of the broad gauge used on Metro lines and much of the regional network. It could even use a different electrical system buying off the shelf, overseas.

Moreover, there is a lot of difference between two services that are basically radial into the city (but intersect at Sunshine) with an actual orbital service. Someone travelling from Broadmeadows to Werribee would need to change three times - at the Airport, Sunshine and Wyndham Vale – which is hardly what was proposed when the SRL maps were first released.

### **The SRL West will only work well if it is a true orbital service and has multiple stops**

SRL maps still show a line to Werribee, separate to the Wyndham Vale line but it appears from government statements that the proposal west of the Airport is dead. This is short sighted.

While not without its challenges, an SRL Western service could share tracks between the Airport and Sunshine with stops at Airport West, Keilor East, Solomon Heights and Sunshine North. It could utilise the standard Metro type trains and be distinguished from MARL by stopping at local stations between the Airport and Sunshine – such as Keilor East, Solomon Heights and Sunshine North

Rather than putting further pressure on the Wyndham Vale line, a more effective route may be to extend the SRL to Newport on the existing rail corridor with stops at Wright St, Yarraville Gardens and Kingsville – serving the major redevelopment in Altona North.

This would complete the loop of Melbourne provide a direct connection to the Williamstown, Altona and Werribee lines. This route would actually connect all of Melbourne’s western suburbs.

It would be considerably cheaper than the initial concept and serve a large potential catchment.

## 4.7 Sunshine and standard gauge passenger services

There has been a long-standing proposal to re-instate the platform that used to enable standard gauge passenger trains to stop at Sunshine. This is hinted at the track diagram released above (Fig 18) but not part of the MARL proposal. The only other possible location for an interchange is Broadmeadows and this has far fewer benefits than for the north east trains stopping at Sunshine.

Including a standard gauge platform at Sunshine Superhub would allow residents from communities north and east of Seymour to change trains at Sunshine and connect easily with Metro services, Regional Rail Link or the Airport Rail Link.

This will become more important as the standard gauge conversion of the Shepparton line is completed. Broad gauge trains will only run to Wallan and other communities along the Shepparton and Wodonga lines will be seriously disadvantaged.

The Craigieburn line will ultimately be electrified on broad gauge tracks as far as Wallan and run via Upfield. Although no timetable has been set, the corridor is already rapidly developing.

The Mayors of the City of Wodonga and Albury City Council have recently made representations to the Victorian Premier as “Two Cities One Community” on the critical need for such standard gauge platform at Sunshine to meet the needs of passengers from North Eastern Victoria. They highlight that other options would be “an inefficient and complicated substitute for a quality train connection at Sunshine Station.”

## 4.9 Sunshine and freight

Currently the Jacana rail corridor comprises one standard gauge track and one broad gauge track – half of the latter has been upgraded to dual gauge. It is used by both freight and standard gauge passenger trains from the North East and proposed for rail/port shuttles from Somerton. There is also a major oil pipeline near the western boundary of the corridor which would be expensive to move if required over its entire length.

However, with the standardisation of the Goulburn Valley line, probably within the decade, will mean the only remaining broad gauge freight service will be the quarry train taking ballast from Kilmore to Westall.

Given the need to realign these tracks to fit the MARL tracks in key locations, it would be desirable to upgrade the corridor so that it provides two standard gauge lines the whole distance, with one being dual gauge if needed. This upgrade should happen as part of the MARL project to secure a high-capacity freight link to the west.

The medium-term plan is to develop the Western Interstate Freight Terminal and build a new orbital freight link on the alignment of the Outer Metro Ring Road (OMR) resulting in the majority of freight trains diverting onto this corridor south of Wallan. This will release capacity on the Jacana corridor for around 50 passenger train movements per day from/to Seymour/Shepparton, Albury and Sydney.

Some argue this will be needed by 2030, but the very high cost of the OMR may see the timeframe delayed and the Jacana link required for freight for a longer period.

Currently there is only one standard gauge track from Albion to south of Sunshine, This runs past Sunshine station on the east side. This section may need duplication, so the land should be reserved to enable this to occur, without disrupting the future operation of the station.

## 4.8 Expand and reorganise trams in the west

The old Footscray tram network had a sorry history and was never fully integrated with the rest of Melbourne’s tram system. In particular, lines were closed, and the network was never extended; so coverage is far less than in eastern and northern suburbs.

There is an opportunity to create a new network of three tram routes around a hub of Highpoint West to interconnect Sunshine, Footscray and Moonee Ponds.

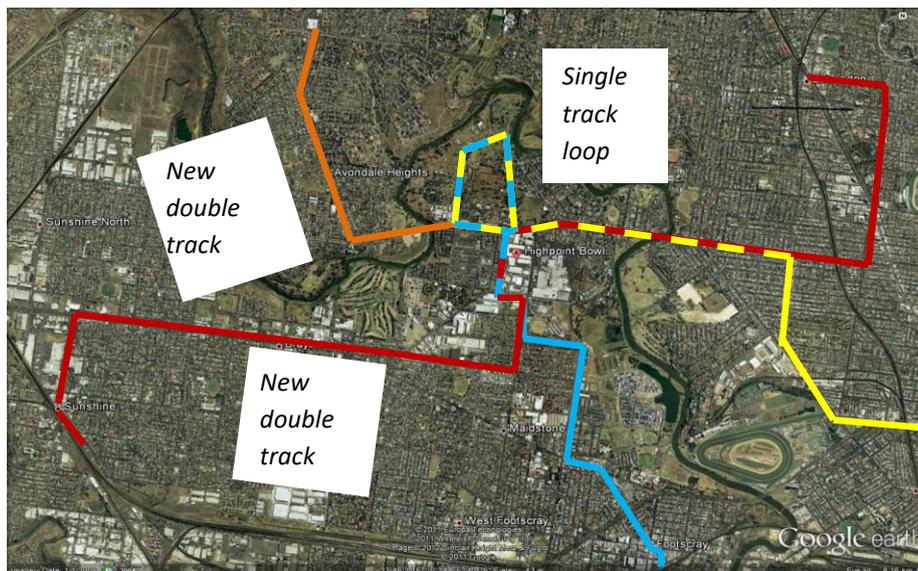
This requires 6.1 km of new double track to Sunshine, 3.4 km to extend trams to Milleara SC and 2.2 km single track to provide a loop to service the proposed Maribyrnong Defence site development. (This would be part paid for by the developer).

The costs are hard to estimate but based on an estimated \$30 m /kilometre<sup>2</sup> could total \$180 m, plus the cost of say 10 extra trams - or \$300 m for all three components. There are no major bridgeworks involved (a modest structure will be required to cross the Maribyrnong River in West Maribyrnong) and Melbourne is well experienced with extending trams in existing roads (for instance Toorak Rd West, and Plenty Road, Bundoora).

The Ballarat Rd section involved has a median strip which could be rebuilt to separate the tram and the intersection of Churchill Avenue/ Hampstead Rd could be realigned in the process to improve the north south road network (when Ashley St and Paramount St are duplicated this would become "the Springvale Rd of the west"). Another option would be to go down Churchill Avenue/ Devonshire Rd St through the heart of the Braybrook and Sunshine residential area – although this is narrow in parts. One option would be new generation "trackless trams" (large electric buses).

Ideally trams would take a more direct route down Rosamond Rd, through Highpoint West shopping centre itself; but for the moment they have their own indirect right of way and a Superstop in place at each end. Another extension along Milleara Rd to service Avondale Heights would also redress the imbalance of a lack of trams in the western suburbs.

**Fig 20: Potential extension of trams from Highpoint to Sunshine**



<sup>2</sup> In 2014 DTF published a cost estimate for tram extensions of based on \$15 million per kilometre, with additional costs for platform stops (\$1.7m each), works for major intersections (\$2.8m each), substations (for extensions over 5 kilometres \$5m each) and terminus works (\$5m each).

## 5. CONCLUSION

The above discussion demonstrates there is a long way to go in developing Sunshine as the “capital of the western suburbs”. There is a yawning gap between the rhetoric and the reality.

There has been an absence of proper public consultation and disclosure of the proposed rail designs and their alternatives. Whilst expectations have been high about the revolution that the Metro Tunnel will bring, the reality in the west is there will be little change.

The Airport Rail Link needs a lot more public discussion about the proposed design, the cost and how it will be used to regenerate the economy of Sunshine and surrounding centres.

Both of these projects remain fairly distant – four and eight years, respectively.

The recent release of concept plans for the Albion rail viaduct and the Expression of Interest specifications for the Sunshine Albion area has focused attention on what is being done to the Sunshine community by the Transport bureaucracy rather than with the Sunshine Albion community with its Sunshine Priority Precinct Future Vision 2050 in hand. The misalignment of Airport Rail plans with the community’s Future Vision 2050 is striking.

The local community and key stakeholders having provided 2100 inputs to Brimbank Council’s Victorian government sponsored community consultation on the Future Vision 2050 are now questioning the gaps between their Future Vision 2050 and the expectations raised by senior political figures in 2018 of a new Southern Cross at Sunshine Superhub with increased investment, more retail, urban design improvements, green corridors and jobs and employment growth.

The local community wants to see:

- The Sunshine Priority Precinct Vision 2050 it developed at the request of the Victorian government over a two year period implemented in a way that respects rather than ignores the transformative spirit and intent behind it
- The Albion rail viaduct proposal dropped, and the Albion Station built into the ground in line with concept plans set out in the Future Vision 2050 document and
- Sunshine SuperHub to be designed and built in line with raised community expectations set in 2018 prior to elections and closely aligned to the community Future Vision 2050 documentation

In the meantime there are a lot of low cost, easily implemented improvements that can pave the way by making it easier to get around, to grow Sunshine as a hub, prepare the ground for new bus and rail services and better connect its parts.

It is time to put the plans on the table and open up to discussion of alternatives. It is unlikely that the development sector will push the button on new plans until they are confident about what will be delivered and how it will transform Sunshine and bring it from the shadows.

A broader engagement on current Transport Plans for the area alongside up to date Land Use Plans is now essential and urgent.

# VTAG VICTORIAN TRANSPORT ACTION GROUP

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## SUNSHINE STATION MASTERPLAN PROJECT

April 2022

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## About the Victorian Transport Action Group (VTAG)

This submission is made by the Victorian Transport Action Group (VTAG), an independent forum focused on solutions to Victoria’s transport challenges.

Members of VTAG have expertise across passenger and freight transport, urban and regional planning, State and Local Government, I.T. and the environment, engineering, architecture, and urban design.

VTAG has an extensive network of connections in state, local government, industry, and academia across planning and public transport that it draws on for insights into the complexity of transport issues and seeks to provide options for equitable, practical, and constructive solutions.

Members are familiar with the challenges of developing and implementing transport plans across all transport modes and understand the difference between blue sky ideas and the reality of funding, political interest, and community support. We are particularly conscious that limits on funding necessitate placing priorities on projects and of the need to conduct balanced examination of often competing agendas. We strive to achieve that objective.

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# SUNSHINE STATION MASTERPLAN PROJECT IDEAS

The Victorian Transport Action Group (VTAG) welcomes the opportunity to provide input into the Sunshine Station Masterplan process and looks to continue engaging on transport and land use planning matters associated with the Sunshine Precinct over coming months and years.

VTAG has released three publications on the Sunshine Precinct over the past twelve months and again puts them forward for consideration in this engagement process as contextual backdrops to this Sunshine Station Masterplan submission.

1. Bringing Sunshine Out of the Shadows (April 2021) (Herrington Report)  
[https://drive.google.com/file/d/17zjxY\\_k4eJQpFfXz5tlfBLcaOAU1L-TQ/view](https://drive.google.com/file/d/17zjxY_k4eJQpFfXz5tlfBLcaOAU1L-TQ/view)
2. Service Step Ups for Sunshine (Sept 2021)  
<https://drive.google.com/file/d/1omViwMlVyMK6AiDYDgXZf9K07nbflwcC/view>
3. Let Sunshine Shine with an Integrated Plan (Nov 2021)  
[https://drive.google.com/file/d/1CdFWUaQvw0jROqNBy\\_0fbjV1nYV-G4Su/view](https://drive.google.com/file/d/1CdFWUaQvw0jROqNBy_0fbjV1nYV-G4Su/view)

These three documents have all been prepared with input from local community groups in the Sunshine – Albion area.

Swinburne Institute of Technology students have also developed alternative options for Sunshine Precinct that focus on future population needs of 70,000 people for liveability, connectivity, sustainability and prosperity outcomes. The alternative options were documented in “Let Sunshine Shine with an Integrated Plan”.

A link to an ABC News report is also attached to provide further background on community views on what is needed at Sunshine Station Precinct.  
<https://drive.google.com/file/d/1ohDKi4bspM6KEcOzfcQzGTJ9z5kxieR1/view>

## Summary

Sunshine is a regional super hub unlike any other. Sunshine is recognised as the capital of Melbourne’s rapidly growing Western Region. The success of the west is ultimately linked to the transformation of Sunshine into a vibrant regional hub.

Sunshine has the potential to become a regional service centre offering ready access to higher levels of retail, hospitality, housing, business, education, health and wellbeing, community, transport, construction, justice, environment, and professional services.

The population of Melbourne's West is expected to surge from the current 835,000 to over 1.8 million in 2050 – larger than Adelaide's current population. The Sunshine Precinct population is to double.

The Victorian Transport Action Group (VTAG), with community support, continues to be sceptical about the Victorian Government's commitment to redevelop Sunshine in accordance with the objectives of Plan Melbourne.

The Government's focus on Project delivery at the expense of integrated planning puts at grave risk a once in a generation opportunity to transform Sunshine into a vibrant hub serving Melbourne's west.

The proposed Sunshine Station Masterplan Ideas have been described by local land use and value creation professionals as potentially "a terrible outcome for our city". The likely Station Masterplan has set no clear goals, objectives or targets; is loaded with optimism bias and lacks clear strategic intent to transform.

The real-life criteria currently being used to decide the Sunshine Transport Precinct's future remain very opaque with along with decision making transparency.

Liveability, connectivity, prosperity and sustainability transformation goals set in the Sunshine Precinct Opportunity Statement are therefore anticipated to be missed should some better sequenced and focused integrated transport and land use planning not emerge soon.

Integrated transport planning of roads and bridges and walking and biking infrastructure is not evident in Masterplanning at either Sunshine Station or at "whole of Precinct" level. Many ideas for discontinuing roadworks or changing what is a complex Precinct have been identified in this Masterplan process without seeming to understand local traffic infrastructure and its flows and patterns. There also seems to be a reluctance to incorporate land use plans that outline strengthened rather than minimalist community infrastructure and greening and cooling initiatives that can adequately service a Precinct population of 70,000 in 2050 let alone servicing a travelling population.

It has also become obvious to the local Sunshine – Albion community there is no clarity about Sunshine Precinct Transformation Governance and who is actually making key planning decisions on the city's future redevelopment and how that decision making is occurring.

Currently there is no clear guidance from an overarching Integrated Plan like a final Sunshine National Employment and Innovation Cluster (NEIC) Framework Plan. This would greatly assist integrated planning including Station Masterplanning. Similarly the 2021 Western Region Integrated Transport Plan has not been released publicly by Department of Transport (DOT) to inform community engagement and participation processes.

The local Brimbank Council has been sidelined as the DOT begins to take on lead agency responsibility for strategic land use and transport planning in the Precinct. The Community Reference Group has no decision making powers and acts as a sounding board for government publications and marketing.

In the meantime big decisions are being made by unknown people / organisations without accountability to the local community. A joint Commonwealth / Victorian government Committee is apparently oversighting the Melbourne Airport Rail and Western Rail Plan planning and implementation in the Sunshine – Albion Precinct but key details about it and its work have yet to be released to the public. The key Big Build decisions the Committee is making or recommending to government are not transparent and the community is not being consulted about them.

The gap between what is actually being decided and the spoken and written narrative e.g. Sunshine Precinct Opportunity Statement seems to be growing by the week.

Rail Project outcomes have clearly been given a much higher priority than future Precinct development outcomes in Big Build decision making. This heavy Projects bias has set the scene for ongoing community tension, protests and action as the Precinct community of 70,000 people bears the longer term impacts on their liveability, connectivity, sustainability and prosperity.

Local community members have noted that while the Andrews government negotiates with Melbourne Airport on whether an Elevated Rail or Tunnel option is best to future proof Tullamarine Airport land no such consideration of these land use options was allowed at the Sunshine - Albion rail corridor end of the Melbourne Airport Rail Line (MARL) project. Fairness seemingly failed the pub test. It appears MARL project cost control is being heavily focused on the Sunshine – Albion component with Station Master Planning scoped to fit.

This cost cutting approach at Sunshine was used when Regional Rail service expansions occurred a decade ago and had a major negative impact on community connectivity, prosperity and liveability at that time and in particular on the south side of the rail corridor. These lessons are ones that should not be forgotten or allowed to occur again.

In this current context, the opportunity to transform the high value, high potential Sunshine Precinct now appears to be fading and likely to be substantially wasted due to a lack of quality integrated planning and disjointed place-based governance involving many actors.

## Action

The huge opportunity to transform Sunshine and with it Melbourne's West is one that compels VTAG to continue its advocacy for urgent interventions by both the Victorian Minister for Transport, the Minister for Planning and the Federal Minister for Urban Infrastructure that can shift the currently derailed land use and transport planning process for the Sunshine Precinct back on track.

The key Actions VTAG recommends be taken as a matter of urgency without severely impacting Project timelines are:

- a) Establishment of an independent expert panel review of the Sunshine Transport Project and Precinct Planning be urgently undertaken to get the transformation / integrated planning process back on track
- b) Preparation of an Integrated Plan that will Let Sunshine Shine in 2050 in a way that current opaque decision making and disjointed governance arrangements are blocking
- c) Establishment of a place-based Sunshine Development Board (or equivalent) like that put in place successfully at Fishermans Bend
- d) Pausing the Sunshine Station "Masterplanning" process while overarching Plans for integrated transport and land use planning for a 2050 Precinct population of 70,000 people are finalised.

It is respectfully suggested that Draft Scenario Masterplans for the whole Sunshine – Albion Transport Precinct set in short (2030); medium (2040) and longer term (2050) planning horizons be developed with clear targets, goals and objectives for the Sunshine area to spark up transformation activity.

These Scenario Masterplans should be presented for further community / stakeholder consultation and validation demonstrating the future vision for the area and a clear view of what the community can expect the Precinct to look like. In this way transparency and accountability can finally begin arriving back in Sunshine – Albion.

## Community kept in the dark

The Sunshine – Albion community has been kept in the dark in this latest Master Planning process. The Nine Ideas process fails to adequately respond to the needs of a Precinct estimated to double in population to 70,000 people between 2020 and 2050.

The Masterplan Nine Project Ideas process is another example of DOT's un-necessarily rushed "Cart before the horse" planning occurring at Sunshine – Albion and contributing to the current Planning mess.

The Auditor General in the August 2021 report on DOT's Integrated Transport Planning performance noted that "not properly sequencing planning work" was a real challenge for the organisation.

The Greater Sunshine Community Alliance feels a case study in poor sequencing of planning has now emerged in the Sunshine Precinct and the impacts have been worsened by the community constantly being kept in the dark on a scale not seen elsewhere.

The Sunshine Station Masterplan process has been conducted without DOT providing the Sunshine – Albion and wider community with access beforehand to the following key documentation:

- Governance documents including Terms of Reference for the Commonwealth / State Committee making key Sunshine-Albion rail corridor decisions on big ticket land use and transport matters for the MARL project and the Western Rail Plan
- Option studies justifying the classifying of the "at grade" Sunshine – Albion rail corridor as a given; the continuing "status quo" location of Sunshine Station Superhub; and, the need for grade separation using a massive 20 meter high Albion Flyover rather than other potential options.
- the Western Region Integrated Transport Plan signed off by DOT Executive in late 2021
- An update on the final Sunshine National Employment and Innovation (NEIC) Framework Plan (an Integrated Plan) under development
- MARL Business Case currently with the Commonwealth Government

- A consolidated set of MARL Environmental Effects Statement (EES) documentation used to gain a Minister for Planning process exemption pre Xmas
- An accompanying set of scoping documents for the Sunshine CBD and Albion Station Master Planning processes

These information and process gaps are significantly different to what is happening on the Suburban Rail Loop East Planning process.

As another comparison example, the Western Sydney Parklands plans specify clear goals and objectives such as population targets, transport mode shares, employment targets and density targets.

Planning is designed to leverage the planned Western Sydney Airport Metro as much as possible, to orient the entire development towards rail based transport.

In other transport plans in NSW, this orientation of development into transport includes direct integration into surrounding buildings, as demonstrated with the newly opened North West Rail Link.

Plans for Sunshine need to include this level of integration of transportation and development outcomes as a combined function including a clear vision with targets.

The “consultation” by Department of Transport (DOT) on Sunshine Station Masterplan Ideas also provides scant advice on the next steps to occur in the process once community responses are received on 10 April 2022 and assessed afterwards.

The Engage Victoria Timeline does say a Final Masterplan will be released in late 2022 without the step of further community validation. It is assumed this will occur after the Victorian elections on 26 November 2022. There is time to get the Precinct planning right and overarching plans ready.

The first version of the Sunshine Station Masterplan is also planned to be the Final version and is to be implemented over coming years.

It seems the Masterplan will have no status in the Brimbank Planning Scheme yet will severely impact local land use development in the short term at least. This approach to urban development is flies in the face of both transport and land use planning legislation on proper community consultation and participation approaches.

## Guidance and Controls for Planning

Greater Sunshine Community Alliance has attempted to understand what planning guidance and controls are and aren't in place in the Precinct in order to respond to the Masterplanning process in a more informed way. Its understanding is presented here for DOT consideration and to share with other stakeholders interested in Sunshine's successful future transformation.

DOT has been appointed the lead agency for strategic transport and land use planning for the Sunshine National Employment and Innovation Cluster (NEIC) area, and, within it the Sunshine Transport Precinct planning area.

The Sunshine NEIC area is the only one of nine such areas in Melbourne with DOT appointed as lead agency for strategic transport and land use planning with the rest overseen by DEWLP. It is a very unusual decision and yet to be properly explained but seems to be a nod to Transport centric planning and decision making, with land use not being seen as a primary function.

When considering strategic land use planning controls, Brimbank Council and all Councils must establish clear probity boundaries for separating the Council role in strategic and operational land use planning work and their service delivery work.

At the local Sunshine Transport Precinct level there appear to be clear probity and role separation issues evident with DOT's rail Project decision making as distinct from DOT'S Precinct land use decision making in the rail corridor. This apparent lack of role separation appears to have been highly beneficial to DOT rail Project budget bottom lines e.g. Sunshine – Albion Works Package of the Airport Rail project where the pre-emptive "at grade" rail corridor decision that was not negotiable and classed as "a given" delivered big project cost benefits according to Rail Projects Victoria spokes people.

In this context, the Planning activity that **DOT** is assumed to be responsible for to guide this Master Planning process at present is **bolded** as follows:

### *3.1 Under Plan Melbourne (in conjunction with VPA)*

- Western Region Land Use Framework Plans (DEWLP responsibility and in progress)
  - Brimbank Planning Scheme (Council responsibility)
    - **Sunshine National Employment and Innovation Cluster (NEIC) Framework Plan and Economic Development Plan (Final Version)**  
(missing)
      - Sunshine Metropolitan Activity Centre and Precinct Structure Plans (Council responsibility and in place)

### 3.2 Under DOT Integrated Transport Planning (as per Auditor General Report Aug 2021)

- **Western Sub Regional Integrated Transport Plan** (signed off by DOT Executive late 2021)
  - **Sunshine Transport Precinct Integrated Transport Plan** (missing area based plan incorporating all integrated transport planning principles and all transport modes including roads and bridges, rail, bike, pedestrian and other modes)
    - **Sunshine – Albion Rail Corridor Precinct Masterplan** (missing)
      - **Sunshine Station Super Hub Precinct Masterplan** (in progress)
      - **Sunshine CBD Hub Precinct Masterplan** (missing)
      - **Albion Station Hub Precinct Masterplan** (missing)

An expert Sunshine Development Board like that in place at Fishermans Bend is the local community's preferred option to oversight the development and ongoing implementation of an integrated Sunshine National Employment and Innovation Cluster (NEIC) Framework Plan and Economic Development Plan.

Another option is a government based land development agency like LANDCOM in NSW, who have more of a prescriptive approach (we want a fast food store of exactly the size we say right here opposite the station entrance), than a descriptive approach (everything in this area is blue on our map, which means retail).

## Masterplan Themes

The Sunshine Station Masterplan Nine Ideas were grouped into four themes each with a set of objectives. The Greater Sunshine Community Alliance analysis of information presented is that the Masterplan Ideas in their current form are most likely to fail to deliver the transformation outcomes set in the Sunshine Precinct Opportunities Statement.

Masterplan Themes	Objectives	Comment
<b>Transport and Access</b>	A Superhub that is safe, active and accessible for people of all abilities, whether taking public transport, walking, riding a bike or driving	<p>Safety - Active sight lines across the site are not shown or mentioned.</p> <p>Accessible for people - does not factor access to the area for pedestrians and improving that access. There is no evidence of aspirations to reduce and remove pedestrian vs vehicle conflict</p> <p>There is an absence of activity and accessibility markers e.g. no escalators at western end; no identification of improved walking and biking or exercise opportunities; short supply of lifts; absence of carers and mothers and babies facilities; unfriendly Spurline gradients; no bus interchange spatial requirements for growing demand. Community safety is a big issue at the Station but there are no Policing functional spaces identified.</p>
<b>Place and Community</b>	A well-designed precinct that contributes to a sense of place and local character that people are proud of and enjoy.	The under provision of open space and greening and omission of a pedestrian / biking bridge connected to the Western side of the Overpass seriously compromises precinct design and useability.

		<p>In Moreland the heritage Signal Box has been re-purposed and needs to be in Sunshine.</p> <p>A more densely populated and less inviting place is a clear potential outcome..</p>
<b>Jobs and Investment</b>	To support the local and state economy by providing an appropriate mix of infrastructure, employment, business and investment opportunities	<p>The infrastructure investment proposed at Sunshine Station is markedly less than that originally planned and has dented investor and job seeker confidence. The continuation of the “at grade” rail corridor is seen as a major impediment to future value creation via private investment.</p> <p>Elevated rail and tunnelling options still need proper investigation for the longer term including proper assessment of their value creation and capture potential.</p> <p>There should be a clear goal in place for jobs and investment for 2030, 2040 and 2050. E.g. “75,000 jobs within the Sunshine NEIC precinct by 2040”</p>
<b>Sustainability</b>	Sustainability runs through the heart of preparing the Masterplan, and helps enhance environmental responsibility, improve access to clean, green spaces and achieve Australia’s goal of net zero.	<p>This “Masterplan” narrative is a major overreach when such limited Sustainability effort is proposed.</p> <p>Mode share targets are required (e.g. 60% of people arriving in Sunshine will arrive by public transport). Aspirations for reduced reliance on motor vehicles to Sunshine need identifying. Active transport support details haven’t been provided.</p> <p>The dominant built form of the Sunshine Metropolitan Activity Centre becomes much more dominating with small low budget open space and greening initiatives planned.</p> <p>The inability to use land under an elevated rail or tunnelling option seriously prevents good sustainability planning for a population of 70,000 people.</p>

## Master Planning Ideas – Analysis

The Station Precinct Ideas are assessed as follows with a template on each of the individual Nine Ideas following in the next Section:

1. A flawed “Spur line” attempt to re-connect the Sunshine and Albion communities that were badly disconnected by decisions a decade ago when the Sunshine Station was redeveloped to cater for expansion of Regional Rail services. Potentially a good idea but the proposed low budget solution re-using existing roads infrastructure is not workable – see more detailed analysis.
2. Three medium density developments at Station Place, Sun Crescent and Southern Villages that all build on the pre-existing Station carparks without identifying in the Masterplan concepts where that carparking could be replaced. Scenario Masterplanning would have been helpful if the Masterplanning aims to discourage cars entering and people parking in Sunshine and then travelling to the city, Airport or regions using up space in the centre all day. Council Structure plans are already in place to guide development for each of these areas. Big developments at the Britax site in Derby Rd and Sunshine Wright St Silos are not included in the planning when they should be. The removal of the Hampshire Rd Overpass is an idea that was never tested even though it is imperative it be moved in future.
3. Future bus volumes should be outlined in the masterplan to shape what's needed. Moving the bus interchanges is potentially a good idea but nothing has been provided to inspire confidence that the Ideas are feasible. Two removals of existing bus interchange and ride share facilities north and south of the Station are identified without sufficient interchange space defined in Masterplan documentation to meet demand for expanded bus and train services and replacement bus services. There is also no future proofing for the later inclusion of a standard gauge platform for NE Region and interstate travellers in the northern carpark area given it is highly probable that it would be built there.
4. Use of small pocket park concepts in the CBD area for open space and greening opportunities when larger scale open spaces need to be designed into the Sunshine – Albion Rail Corridor Precinct Masterplan to cater for a doubling of population to 70,000 people.
5. Unclear and under provided station entrance and access improvements at what is likely to be Melbourne’s busiest station precinct outside the Melbourne CBD. Escalators are missing at the western end, lifts are in short supply, connections into community remain unclear, wayfinding in multiple languages will be needed; community safety features are missing and facilities and services to service a rural, regional, and international travelling community are not provided e.g. retail opportunities, showers and change rooms, Police station, food and beverage spaces , carers rooms, baby and toddler change rooms etc. A strong retail and facilities strategy for the station itself will be required for the area

to be successful. The heritage listed Sunshine Signal Box has no place in this Masterplan despite them being re-purposed in places like Moreland.

6. The proposed small scale tree planting and greening will have little if any impact on the current heat island in the Sunshine Activity Centre where the built environment completely dominates the natural environment. The proposed Master Planning substantially adds to that domination of built form over natural environment and demonstrates the fallacy of planning the long term future of the city without properly considering the benefits and costs associated with Master Planning Scenarios for elevated rail or tunnelling options for the 2.4 km rail corridor.

## Sunshine Station Masterplan Nine Ideas – A Local Assessment

Key Focus Area	Aim	Pros	Cons	Comment
1. Hampshire Road Bridge Spurline	<ul style="list-style-type: none"> <li>• create a new walking and cycling line over the rail corridor</li> <li>• connect Sun Crescent to Hampshire Road high-street</li> <li>• become a local feature that reflects Sunshine's character</li> <li>• sustainably re-use existing infrastructure</li> </ul>	<p>Identifies the need for a better pedestrian and biking crossing as current arrangement via the Station is a very poor one that has contributed to the downturn of Sun Cres Precinct</p> <p>Attempts to minimise transport project costs by re-using existing infrastructure.</p> <p>Allows consideration of "add-on" pedestrian and bike bridge option on the western to Hampshire Rd Overpass while leaving Harvester Rd Spur line as it is.</p>	<p>The Spurline idea does not connect pedestrians and bike riders into the heart of City Place on the south where highest footfall exists. The existing Harvester Rd. infrastructure connects western region motorists to the Sunshine Marketplace, Village Cinema and Ballarat Rd without them congesting the Sunshine CBD and Anderson Rd to get there. The Spurline idea funnels and congests traffic from the south and west into one lane on the overpass and then to choke points at Withers St roundabout and traffic lights further down the street. The Spurline idea blocks traffic heading east to Dickson and Monash Streets and turns it into a highly congested and busy activity centre. Council has been working to keep cars out of the CBD for many years.</p>	<p>The using existing infrastructure option has difficult grades for young, elderly and disabled people. Harvester Rd was built about 25 years ago to reduce high congestion levels from the south and west of the Sunshine CBD and to remove traffic from the CBD and make it pedestrian friendly. The pedestrian / biking bridge design should be like the Clarendon St bridge over the Yarra River –New Funding is essential.</p> <p>The Idea increases traffic travelling through Sunshine and increases pedestrian-vehicle conflicts, instead of diverting vehicles around the activity centre.</p> <p>If the Spur line idea is pursued long delays for motorists can be expected with Hampshire Rd, Monash St and Anderson Rd all badly affected.</p>

Key Focus Area	Aim	Pros	Cons	Comment
2. New integrated bus interchange	<ul style="list-style-type: none"> <li>• better integrate bus and rail services within the Superhub</li> <li>• provide easier transition between rail and bus</li> <li>• create an improve the Superhub concourse arrival area</li> <li>• improve safety and accessibility</li> </ul>	Rail and bus services closer together – potentially better way finding, connectivity, operations and safety.	<p>No allowance for new standard gauge platform on adjacent standard gauge line.</p> <p>No escalators at western end of station for easier access to bus interchange</p> <p>Small space for bus interchange despite doubling of population to 70,000 by 2050 and increased bus and train services from 2025 onwards (MM1)</p> <p>Big Carparking space lost and replacement carparking space not identified.</p> <p>Ride share spaces for taxis, Ubers etc are lost and not replaced</p> <p>Bike trail and walking path lost and not replaced</p> <p>No bus interchange connections to planned new concourse at Melbourne facing end of platforms</p>	<p>Buses in pre-Covid times “lapped” around existing streets and park in Dickson St awaiting spaces at the current bus interchange as it was too small</p> <p>The current bus interchange space appears lost to mixed use development in this “Masterplan”</p> <p>A smaller bus interchange / carpark footprint can only create major problems for 2030- 2050 when population gradually doubles and bus, train and ride share services grow considerably.</p> <p>Future proofing the bus interchange and station needs to be adequately considered, and to do this, a full understanding of future requirements are needed.</p> <p>Consideration needs to be provided for rail-replacement services when they occur, and ensuring that there is enough space within the interchange for both regular bus services and temporary services.</p>

Key Focus Area	Aim	Pros	Cons	Comment
<p>3. People focused streets and junctions</p> <p><a href="#">Sunshine: Daring to be great. Economic development and jobs strategy for the Sunshine gateway precinct (vu.edu.au)</a></p>	<ul style="list-style-type: none"> <li>re-designs traffic junctions for improved walking and cycling</li> <li>creates new pedestrian streets connecting the town centre</li> <li>sees more street trees and planting</li> <li>improves sense of safety and comfort</li> </ul>	<p>The idea identifies existing problems with walking and cycling, disconnection and safety and comfort within the city area and the need identified in the WOMEDA <b>"Sunshine Daring to be Great" Report</b> to improve amenity. Also ties into BCC Vision 2050 and Swinburne students visioning and design work.</p>	<p>A minimalist approach with very small initiatives that have minor impact on the overall area and the amenity problems within it.</p> <p>There are no metrics or details provided to understand the proposed scale of change and investment</p> <p>No clear alignment with Movement &amp; Place Framework.</p>	<p>Reducing car volumes in the area is key to improving people focused, but a holistic view of the road network is needed.</p> <p>Needs a "whole of Precinct" Streetscapes Plan across Sunshine Station, Sunshine CBD and Albion Precinct to have an impact on wide scale amenity issues.</p> <p>No idea presented for repurposing of heritage Sunshine Signal Box e.g. Moreland.</p>
<p>4. Improvements to station entrances</p>	<ul style="list-style-type: none"> <li>create more active and attractive destinations</li> <li>reduce the visual impact of the Hampshire Road bridge structure</li> <li>define station entrances that are closer to places of activity</li> </ul>	<p>Idea identifies current Station location amenity problems and disconnect with activity centres.</p> <p>Impact of Hampshire Rd Overpass visually and operationally also identified</p>	<p>"Masterplan" keeps Station "at grade" in current disconnected location and tinkers with amenity, connections and entrances. Elevated rail and Station scenario not identified.</p> <p>No escalators at western end.</p>	<p>Unclear just what improvements to Station entrances are being considered and accessibility lifted for one of Melbourne's busiest stations.</p> <p>Removal of Hampshire Rd Overpass and replacement scenarios not considered.</p> <p>Direct integration into potential future buildings should be considered, directly connecting into the walkway overpasses.</p> <p>E.g. Rhodes Waterfront (Shopping Centre) is building a direct overpass from the shopping centre into the station concourse</p>

Key Focus Area	Aim	Pros	Cons	Comment
5. Trees and greening	<ul style="list-style-type: none"> <li>provide new green space to help green Sunshine &amp; improve local amenity</li> <li>helps reduce local temperatures</li> <li>provide ecological and broader health benefits</li> <li>create attractive, sheltered and shaded</li> </ul>	The identification of poor tree canopy coverage around existing bus interchange area and surrounding streets and need to improve existing amenity welcomed.	<p>Many of the nine (9) different ideas remove much of the greening opportunity. There is no quantification of the scale of the problem or potential investment in changing the amenity. It appears a minimalist / low budget plan likely to have little impact.</p>	<p>Much needed greening of this area needed but no confidence the idea can deliver the aims identified without seeing a "whole of Precinct" Streetscapes Plan for the three areas - Sunshine Station, Sunshine CBD and Albion Precinct.</p> <p>Clear tree canopy coverage target for precinct required</p> <p>Water Sensitive Urban Design needs to be considered and how this integrates into spaces, including water reuse targets.</p>
6. New public open space	<ul style="list-style-type: none"> <li>strengthen the connection between Hampshire Road and the Spurline</li> <li>provide high-quality public spaces on north side of the rail corridor at a key crossing point</li> <li>provide new green space to help beautify Sunshine and increase tree canopy cover</li> <li>increase public open space in a busy location</li> </ul>	Good that the open space and canopy problem in what will be a heavily populated area housing 70,000 people is being identified.	<p>Heat island effect due to high levels of built infrastructure / form and lack of tree canopy in the Sunshine Activity Centre is already an issue.</p> <p>The quantum of open space proposed is grossly inadequate for a doubled population by 2050.</p> <p>The useable open space for trees and greening is way less than the circled area on the map.</p> <p>Future proofing the Precinct</p>	<p>The idea does not deliver anywhere near enough opportunity for community to accrue open space health and wellbeing and economic benefits.</p> <p>The idea's impact on the local "heat island effect" coming from Activity Centre built infrastructure will be minimal if at all given the small scale investment proposed.</p> <p>Much bigger open space provisions are needed along</p>

			<p>is essential in a Masterplan yet it is not being factored in.</p> <p>The proposed "Masterplan" is for today not the medium to longer term and is clearly being scoped to a small budget.</p>	<p>Sunshine-Albion rail corridor in a "whole of Precinct" Masterplan covering Superhub, CBD and Albion Station precincts.</p>
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Key Focus Area	Aim	Pros	Cons	Comment
7. New Station Place mixed-use development	<ul style="list-style-type: none"> <li>integrate the Superhub as part on expanded southern CBD with new development, open spaces and walking and cycling routes</li> <li>increases activation, passive surveillance on all sides of the Superhub with a mix of new uses, night-time activity and new lighting to increase sense of safety</li> <li>ensure streets, spaces and all parts of the Superhub are activated and safe, well-lit and overlooked by surrounding development</li> </ul>	<p>Further assists the transformation of the Activity Centre and densification of Sunshine.</p> <p>Potential community safety improvements from more passive surveillance.</p>	<p>Assumes bus interchange can be moved to current northern carpark without testing the feasibility of space requirements for buses and ride share services and northern carparking replacement spaces.</p> <p>Potential for loss of bus interchange space and carparking spaces.</p> <p>No scenario considered for use of the current bus interchange as a park.</p> <p>Adds to heat island effect without any greening opportunities identified in this idea.</p> <p>No direct integration</p>	<p>Station Masterplan footprint scenarios not provided should different mixes of ideas be considered along with how the impacts are being managed e.g. loss of carparking in an area already under provided.</p> <p>No clarity on preferred Masterplan options creates more confusion and questions.</p> <p>Direct pedestrian integration needs to be considered, minimising walking distance and time in the vertical plane</p>

Key Focus Area	Aim	Pros	Cons	Comment
8. Re-invigorate Sun Cres village	<ul style="list-style-type: none"> <li>integrate new development with the existing character</li> <li>support the local high street character of Sun Crescent and City Place</li> <li>balance investment on both sides of the rail corridor to ensure the western side becomes a vibrant and active part of Sunshine's CBD</li> </ul>	<p>Idea reinforces Council and community vision for regeneration of the area.</p> <p>Acknowledgement of damage done to this area by Regional Rail Line project under investment a decade ago welcomed.</p>	<p>A Development Plan is in place for a 7 story Travelodge Hotel in the western half of Sun Cres but this land has recently had a "For Sale" sign erected.</p> <p>Idea proposes transition of the current large Station carpark / replacement buses spaces on Sun Cres to a village without identifying where carparking is to go in future if this idea goes ahead.</p> <p>Investment has not occurred for a decade or more in the Sun Cres area since the RRL changes to Station and removal of underpass which severely disconnected foot traffic between both sides of the rail corridor.</p> <p>There is a lack of confidence that this minimalist "Masterplan" does nearly enough to encourage the substantial investment needed to create a village on this side of the tracks.</p>	<p>A good quality pedestrian and cycling bridge on the western side of the Hampshire Rd Overpass (should it remain in place and not be demolished) is essential to enabling the western side around City Place and Sun Cres to regenerate to its past glory.</p> <p>The future carparking for the whole Station precinct is a major strategic issue given the ideas presented in the Masterplan that take away each of the existing ones in some form.</p> <p>The heritage Paps Market site also provides an opportunity in Master Planning to activate the area.</p>

Key Focus Area	Aim	Pros	Cons	Comment
9. New southern village development	<ul style="list-style-type: none"> <li>• create a link between the existing neighbourhoods to the north and south of the railway.</li> <li>• create opportunity for local services, retail and community use</li> <li>• improve the environment for walkers with slower road speeds and more pedestrian access</li> </ul>	<p>Idea reinforces existing land use plans and Development Plan in place for major housing development on the old Britax site.</p> <p>Idea also connects to emerging Development Plan ideas for the Sunshine Wright St Silos site.</p>	<p>The existing Station Carpark and Bus interchange on this southern side of the Station is lost and adequate replacement spaces are not identified.</p> <p>Loss of heritage buildings possible.</p> <p>Hampshire Road Overpass replacement options not identified.</p>	<p>The Masterplan footprint for bus and carparking space is lessened by this idea despite a planned doubling of population by 2050</p> <p>No identification of community vision for green biking, walking and open space corridor along Sunshine - Albion rail corridor with Sunshine Silos and Albion Silos as its bookends.</p> <p>No narrative about preservation of heritage at Sunshine Theatre site on Hampshire Rd.</p>

# VTAG VICTORIAN TRANSPORT ACTION GROUP

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## Service step-ups for Sunshine



September 2021

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## About the Victorian Transport Action Group (VTAG)

This submission is made by the Victorian Transport Action Group (VTAG), an independent forum focused on solutions to Victoria’s transport challenges.

Members of VTAG have expertise across passenger and freight transport, urban and regional planning, State and Local Government, I.T. and the environment, engineering, architecture, and urban design.

VTAG has an extensive network of connections in state, local government, industry, and academia across planning and public transport that it draws on for insights into the complexity of transport issues and seeks to provide options for equitable, practical, and constructive solutions.

Members are familiar with the challenges of developing and implementing transport plans across all transport modes and understand the difference between blue sky ideas and the reality of funding, political interest, and community support. We are particularly conscious that limits on funding necessitate placing priorities on projects and of the need to conduct balanced examination of often competing agendas. We strive to achieve that objective.

Contact:

**Mike Reece,**

**Secretary,**

**Victorian Transport Action Group**

**Email: [info@victransport.com.au](mailto:info@victransport.com.au)**

**Phone** s47F - personal privacy

## Introduction

Sunshine needs to be accessible by all transport modes for it to reach its full potential as a National Employment and Innovation Cluster. Increased access to Sunshine increases the pool of labour and customers from surrounding areas while better access within it allows the cluster to work better.

Especially when centres grow beyond a certain point public and active transport need to assume a greater role to maximise its efficiency and prospects for growth. Access needs to be good to all parts of the Sunshine NEIC, not just the portion near the station.

Sunshine CBD has infrastructure advantages due to its junction location on the rail network. However it also has service disadvantages due to it receiving the least Metro rail service relative to the patronage of its station. The table below shows how its frequency compares with stations on better served lines.

**HALF THE SERVICE:** At many times waits for Metro trains at Sunshine are double what they are on better served lines such as to Frankston and Dandenong.

Station	M-F peak freq	M-F day freq	M-F night freq	Sat-Sun day freq	Sun am freq	Sat-Sun night freq
Sunshine	<10	20	30	20	40	30
Box Hill	<10	15	30	10	30	30
Dandenong	<10	10	10	10	30	30
Frankston	<10	10	20	10	20	20
Werribee	10	20	20	20	20	20

Numbers are typical train frequencies in minutes

While many bus routes serve Sunshine, their frequency likewise typically falls short of the turn-up-and-go standards that a major centre needs. There are also issues with regard to the complexity of the network, difficulties encountered for short trips within the Sunshine NEIC area and particularly low service levels on some feeder routes including those passing Sunshine Hospital.

Taking all modes as a network, the map below shows how Sunshine compared against other part of Melbourne with regards to frequent public transport. This is important because when it comes to business and personal location decisions Sunshine NEIC will be competing with many more accessible locations.

**Unlike other part of Melbourne, Sunshine currently has no turn up and go public transport services operating off-peak.**



**Weekday turn-up-and-go public transport in Melbourne  
Lines show service every 10 min or better (M-F off-peak day)**

## Sunshine – Melbourne Airport shuttle (Route 500)

### Proposal 1: Sunshine – Melbourne Airport Shuttle (Route 500)



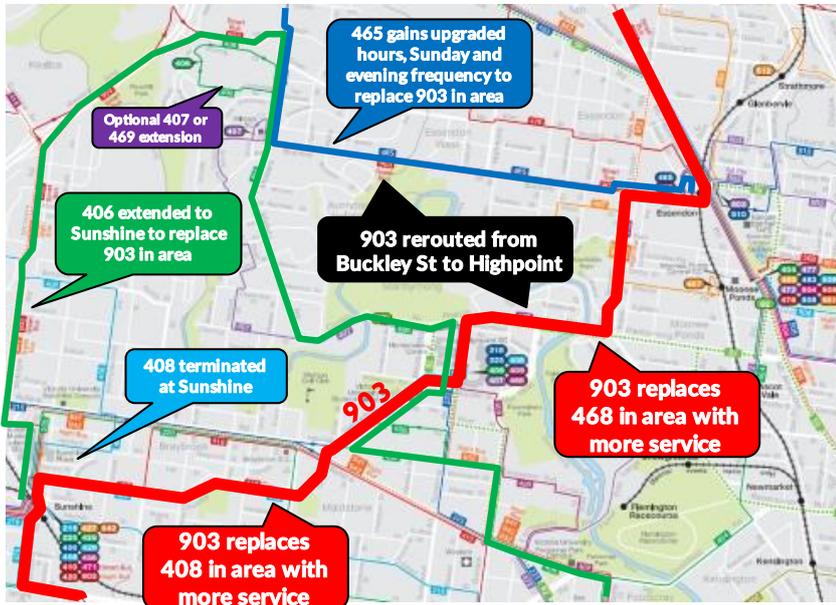
#### Fast bus between Sunshine and Melbourne Airport every 15 – 20 minutes over long hours.

- Aids airport access from fast growing 1 million population catchment including Geelong, Wyndham, Hobsons Bay, Melton, Brimbank, Maribyrnong
- 20 - 40 min travel time savings compared to existing myki PT options
- Brings forward many benefits of airport rail & establishes travel patterns early
- Potential access to industrial area jobs with intermediate stops
- Route approx 16 km long – estimated bus requirement 5 – 6 buses

Introduce a fast limited stops bus route between Sunshine Station and Melbourne Airport operating 7 days every 15-20 minutes over long hours. This will improve connectivity and establish travel patterns in preparation for airport rail.

## Sunshine - Highpoint SmartBus (Route 903)

### Proposal 2: Sunshine – Highpoint SmartBus (Rerouted 903)

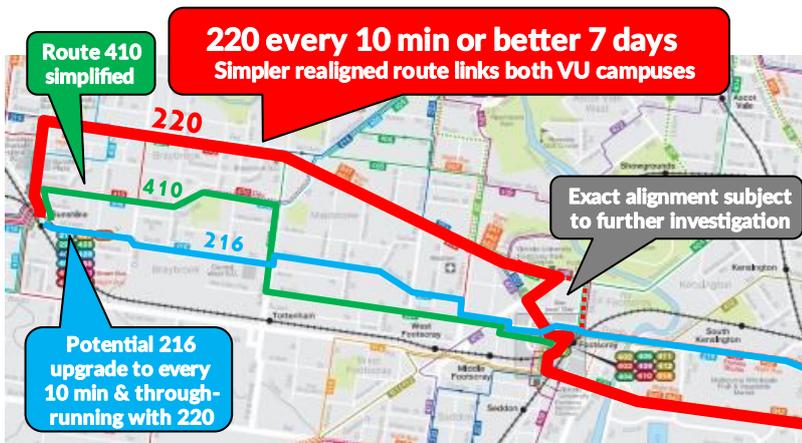


#### SmartBus 903 via Highpoint

- Enables new 7 day and higher frequency access to Highpoint from Essendon, Craigieburn line and northern suburbs
- Extends bus operating hours and frequency in densifying parts of Maribyrnong and high patronage Braybrook
- 465 upgrade allows simpler Buckley St service including buses optimised to meet almost all trains at Essendon.
- Reroutes 903 SmartBus via Highpoint to Sunshine to replace existing lower service routes 468 and 408. Route 406 extended to Sunshine and Route 465 upgraded to replace 903 in Keilor East.
- Low cost due to reduced route overlap and duplication

Reroute 903 SmartBus between Essendon and Sunshine to improve connectivity to Highpoint Shopping Centre to replace existing lower service routes 468 and part of 408. Done in conjunction with upgrades to bus route 465 and a westward extension of bus route 406 to the Sunbury line to retain connectivity from the Keilor East area.

## Sunshine – Ballarat Rd Megabus (Route 220)

**Proposal 3: Sunshine – Ballarat Rd MegaBus (Rerouted 220)****A simple tram-like service for Ballarat Road**

- Turn-up-and-go service along Ballarat Rd, linking two VU campuses and new Footscray Hospital
- Supports Sunshine NEIC with premium direct service from east through strong a patronage catchment
- Corridor could be developed with bus priority, electric articulated buses and high quality stops. Future BRT or light rail.
- Involves reform to Route 410 to reduce overlap and simplify network including running all its trips the same way.

In conjunction with other network reform involving routes 410 and potentially 216, provide a simple and frequent bus between Sunshine and the CBD via Ballarat Rd connecting both VU campuses and the under-construction new Footscray hospital. As a high patronage potential service, this would be a high frequency route operating every 10 minutes or better seven days per week with articulated buses, high quality stops and enhanced priority. This is a potential future light rail corridor.

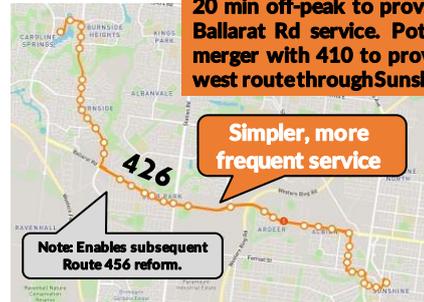
Local bus service upgrades and network reforms as follows:

**Proposal 4: Local bus service upgrades - 1**

Smaller upgrades that can mostly be done independently of larger Proposals 1 - 3



**216: Upgrade to every 10 min daytime and 20 min evenings. Potential to through-route with 220 to provide one-seat ride to VU.**



**426: Upgrade to every 15 min peak / 20 min off-peak to provide a simpler Ballarat Rd service. Potential future merger with 410 to provide an east-west route through Sunshine.**



**410: Simplify to run all trips via Churchill Av. Operate a consistent 7 day service with longer hours. Initial upgrade could boost Sunday service from every 60 to every 20 - 30 min.**

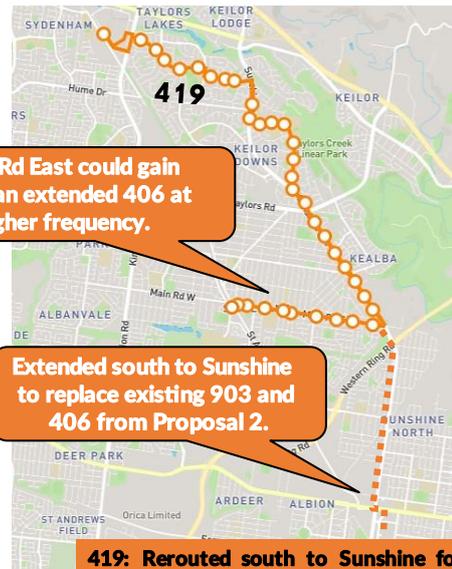
**Route 216 Sunshine to City (via South Rd and Footscray).** Upgrade to every 10 min weekday, 20 min night and weekends. Extend to Victoria University to provide more destination options for travellers. As a high patronage potential service, this would be a high frequency route operating every 10 minutes or better seven days per week with enhanced bus priority.

**Route 410 Sunshine to Footscray (via Churchill Avenue).** Reroute off Ballarat Rd to operate consistently operate via Churchill Av (currently 410 follows an inconsistent route with an hourly deviation). Operate a consistent 15 min peak/20 min off-peak 7-day service with longer hours. Initial upgrade could boost Sunday service from every 60 to every 20-30 min.

**Route 426 Caroline Springs Town Centre to Sunshine.** Currently every 40 minutes this provides an irregular service along with Route 456 along Ballarat Rd. Upgrade to every 15 min peak / 20 min off-peak. This would provide a simpler Ballarat Rd service connecting with trains at Albion. Potential exists for a merger with Route 410 to provide an east-west route through Sunshine.

## Proposal 4: Local bus service upgrades - 2

Smaller upgrades that can mostly be independently of larger Proposals 1 - 3



**419: Rerouted south to Sunshine for better northern access to Sunshine Superhub and Airport Bus/Rail Upgraded to every 20 min or better 7 days. Would operate 24 hours on weekends, replacing the very similar 941 Night Bus. Main Rd East could be served (at higher frequency) by an extended 406 (Proposal 2).**

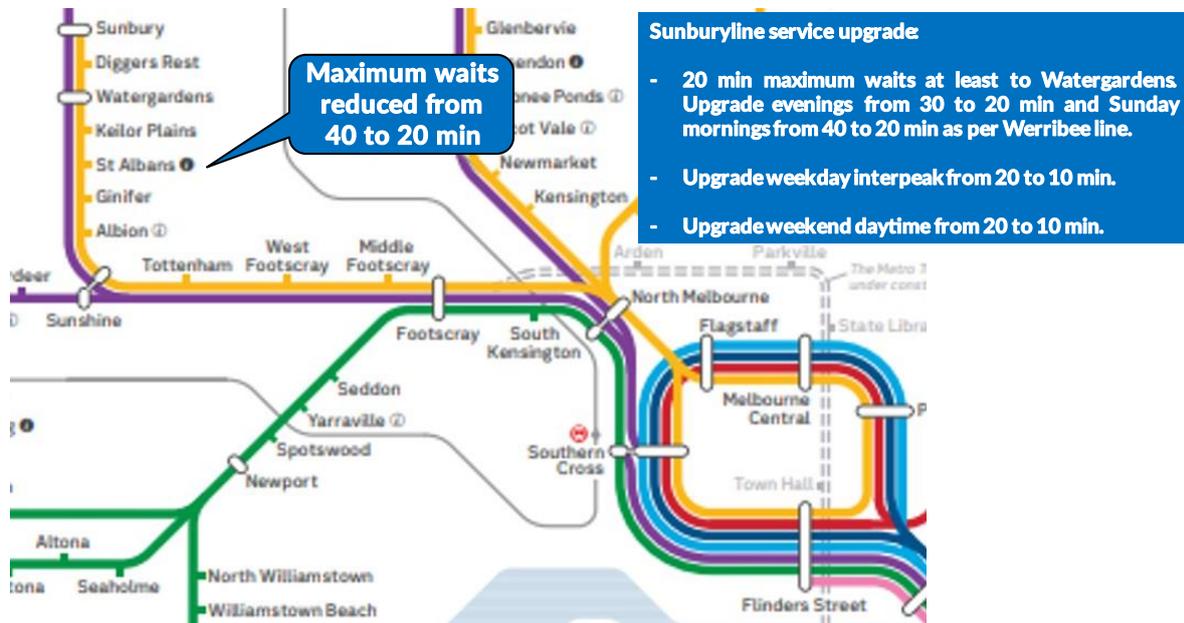
**Route 408 St Albans to Highpoint via SHWEP and Sunshine.** Upgrade with longer hours and Sunday upgrade to every 20 minutes. Would improve access to Sunshine Hospital. Potential western extension along Furlong Rd to Brimbank SC for improved hospital access in conjunction with other network changes. Note that the Sunshine – Highpoint portion would be subsequently replaced by the rerouted 903 SmartBus as per above.

**Route 419 New Watergardens – Sunshine route (via Sunshine Ave and McIntyre Rd).** Formed by extending Route 419 to Sunshine with Route 406 extended west to St Albans to serve Main St East. Would operate every 20 min or better 7 days and better connect Sunshine with close in areas to the north.

**Route 428 Sunshine – Sunshine West.** Upgraded from every 40 to every 20 min off-peak with some resources to come from deletion of Route 429 in Sunshine South area and a minor rerouting of 428 to provide replacement coverage.

## Metro train service upgrades

### Proposal 5: Metro train frequency upgrade



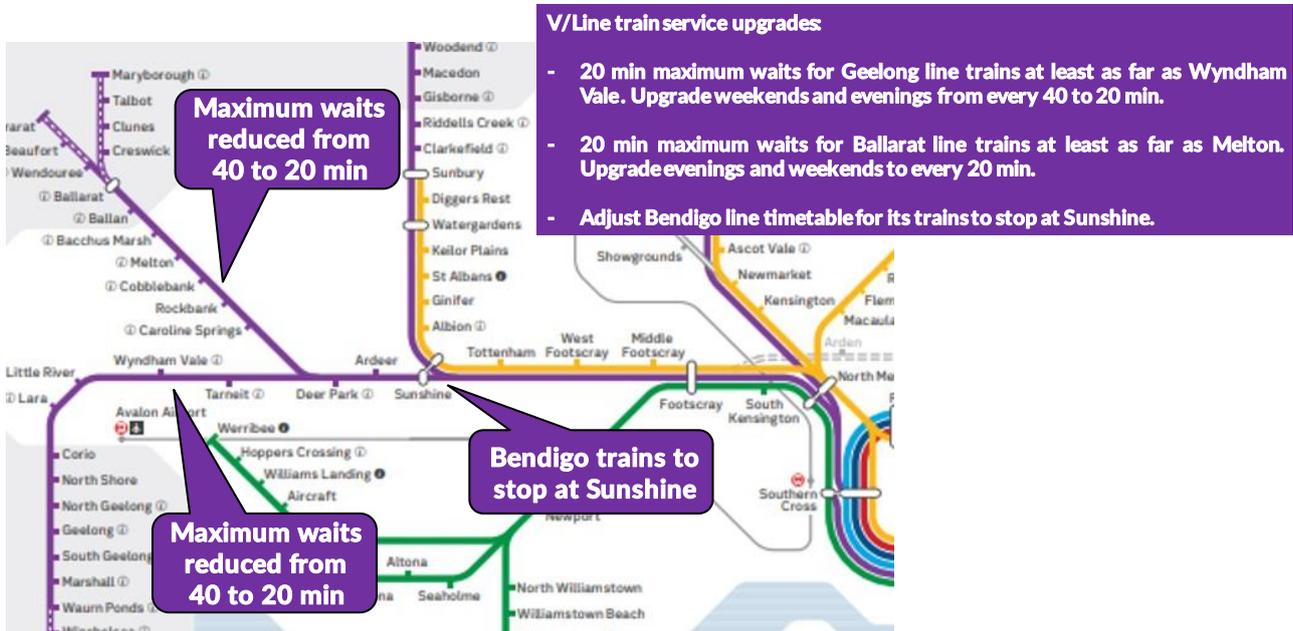
20 min maximum waits for Sunbury line trains at least to Watergardens. Upgrade evenings from every 30 to 20 min and Sunday mornings from every 40 to 20 min as recently done on the Werribee and Williamstown lines

Upgrade weekday interpeak from every 20 to every 10 min

Upgrade weekend daytime service from every 20 to every 10 min

## V/Line train service upgrades

### Proposal 6: V/Line train service upgrades



20 min maximum waits for Geelong line trains at least as far as Wyndham Vale. Upgrade weekends and evenings from every 40 to every 20 min.

20 min maximum waits for Ballarat line trains at least as far as Melton. Upgrade evenings and weekends to every 20 min.

Adjust Bendigo line timetable for its trains to stop at Sunshine.

### Conclusion

These are all modest cost upgrades which can be implemented independently of waiting for the Metro Rail Tunnel and Airport Rail Link opening. Some mainly utilise existing bus resources but make better use of them and provide more direct connections to key destinations.

s22(1)(a)(ii) - irrelevant material

**From:** Marion Terrill <[s47F - personal privacy@grattaninstitute.edu.au](mailto:s47F - personal privacy@grattaninstitute.edu.au)>

**Date:** Thursday, 2 June 2022 at 9:52 am

**To:** [catherine.king.mp@aph.gov.au](mailto:catherine.king.mp@aph.gov.au) <[catherine.king.mp@aph.gov.au](mailto:catherine.king.mp@aph.gov.au)>

**Subject:** Request for meeting

Dear Minister

Please accept my warm congratulations on your appointment as Minister, and my best wishes for the challenges ahead. I welcome your continuity in this portfolio, and I look forward to working with you in your role as Minister.

I am writing to seek a meeting with you. In particular, I'd like to talk to you about actions you might consider taking in the near term in support of your review of Infrastructure Australia. I agree that such a review is well and truly due, and I'm optimistic that there are practical ways to strengthen it.

I look forward to the opportunity to speak further with you.

With kind regards, Marion

Marion Terrill | Transport and Cities Program Director

Telephone: +61 (0)3 <sup>s47F - personal privacy</sup> | Mobile: s47F - personal privacy

**Grattan Institute** | 8 Malvina Place Carlton VIC 3053

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Anthony Albanese is proud of Infrastructure Australia, the body he set up as Infrastructure Minister in the Rudd government to help elected representatives who [‘struggle with the need to take a long-term, non-partisan view’](#) of infrastructure.

Yet in the heat of the 2022 election campaign, that same Albanese promised \$2.2 billion for Victoria’s controversial Suburban Rail Loop, a project without a business case and that has never made it onto even the most preliminary stage of Infrastructure Australia’s priority list.

Plenty of water has passed under the bridge since Albanese established Infrastructure Australia, but the prize has become even more compelling. With a mountain of debt to contend with, and a big infrastructure wish-list, it’s all the more important today that infrastructure investment supports productivity, and that every dollar counts.

Infrastructure Australia needs to be reconstituted under a flag of integrity. And the new Prime Minister has crafted the mechanism to bring this about.

Albanese set up Infrastructure Australia in 2008 as a statutory advisory council to government, with 12 members from industry and governments. His goal was [‘to delink the infrastructure investments cycle – which is, by definition, long-term – from the electoral cycle, which is much more short term’](#). The body was overhauled by then-Minister Warren Truss in 2014, making it an independent entity with a board appointed by the minister.

Whatever the merits of the Coalition’s 2014 overhaul, Infrastructure Australia’s critics now claim it’s not listened to. As Shadow Minister, Labor’s Catherine King said the agency had been [‘largely sidelined’](#) by government. She had a point: of 22 transport projects worth \$500 million or more which have received federal funding since 2016, [only six had a business case published or assessed by Infrastructure Australia](#) at the time of commitment. In the most recent federal budget, 38 projects received \$250 million or more in federal funding, but only eight of them had been evaluated by Infrastructure Australia as nationally significant and worth building.

It was Shadow Minister Anthony Albanese who, on the floor of the Parliament in 2014, proposed a pact that, if it had not been voted down, would have stomped on much of the wasteful and politicised spending on infrastructure that followed. [He proposed that](#), before approving federal funding of \$100 million or more for an infrastructure project, the minister must consider Infrastructure Australia’s evaluation of the project, including a cost/benefit analysis, and the priority of the project. In other words, there couldn’t be a major funding commitment if there hadn’t been a proper appraisal of the project.

Eight years may have passed, but it's not too late. If legislated, this law change would have two powerful effects. First, it would reinstate the threshold for evaluation by Infrastructure Australia to \$100 million, where it was until its relaxation to \$250 million 18 months ago. Even a \$100 million threshold is high; much of the federal infrastructure spend is made up of small projects that are never subject to this threshold, such as roundabouts, overpasses, and carparks. [Most of these probably shouldn’t be funded by the federal government at all](#), but if they are, they should be scrutinised properly too.

And second, this law change would halt premature commitments of public money to infrastructure projects; instead, when ministers made investment decisions, they'd have a much better idea of what they were committing to.

Defenders of the status quo may argue that it's governments, not bureaucrats, who are elected to make decisions, and that they face the voters every three years for judgment. But under a beefed-up Infrastructure Australia, the decision to invest in a project would absolutely remain with the government. What would be different is an enforced discipline: ministers would no longer be able to make funding commitments on the hoof. [Prematurely announced projects are much more prone to cost overruns](#), so an additional benefit would be fewer nasty budget surprises.

The election result means the writing is now on the wall. Independent MPs want to include pork-barrelling in the remit of a new federal anti-corruption body, on the grounds that it is misuse of public money for political or private gain. Regardless of where that proposal ends up, a simple reform of Infrastructure Australia offers a way to stem the flow of rorts at its source.

This is a question of what Anthony Albanese wants his legacy to be. The best time to make a tough decision is before the decision becomes tough. He should act now, so he can be prouder still of Infrastructure Australia – and so that taxpayers get better bang for their transport bucks.

*Marion Terrill is the transport and cities program director at the Grattan Institute.*

s22(1)(a)(ii) - irrelevant material

**From:** s47F - personal privacy

**Sent:** Thursday, 4 August 2022 1:28 PM

**To:** Minister.King.MO

**Subject:** Meeting Request from Brimbank Mayor Cr Jasmine Nguyen re Melbourne Airport's Proposed Third Runway

Dear Minister King,

I write in relation to the attached letter from Brimbank City Council's Mayor Cr Jasmine Nguyen kindly requesting a meeting with you to discuss Council's concerns regarding Melbourne Airport's proposed third runway. Please note that the second attachment is our submission that is referred to in the letter.

I'm conscious of the fact that this letter was sent very early after your appointment to Federal Cabinet and at a time when you were still staffing your office. It would therefore be much appreciated if this meeting request with Mayor Nguyen can be considered at your earliest convenience. We have been advised that Melbourne Airport's finalised proposal will be submitted to you during the first week of September, so it would be timely for our Mayor to be able to discuss the matter with you and how it will impact Brimbank's residents.

We look forward to hearing from your office.

Kind regards



s47F - personal privacy

Senior Advisor, Strategic Advocacy & Engagement | Advocacy Partnerships and Community Engagement

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Brimbank City Council respectfully acknowledges and recognises the Wurundjeri and Bunurong peoples as the Traditional Custodians of this land and pays respect to their Elders past, present and future.

This e-mail and any files transmitted with it are confidential and are intended solely for the use of the individual or entity to whom it is addressed. If you are not the intended recipient or the person responsible for delivering the e-mail to the intended recipient, please be advised that you have received this email in error and that any use, dissemination, forwarding, printing, or copying of this e-mail and any file attachments is strictly prohibited. If you have received this e-mail in error, please immediately notify Brimbank City Council on +61 3 9249 4000 or by reply e-mail to the sender. Please delete the original transmission and its contents.



# **BRIMBANK CITY COUNCIL SUBMISSION**

April 2022

**Melbourne Airport Draft 2022 Master Plan and  
Preliminary Draft Major Development Plan for  
Third Runway**

Brimbank City Council respectfully acknowledges and recognises the Wurundjeri and Bunurong Peoples as the Traditional Custodians of this land and pays respect to their Elders, past, present and future.

Hellier McFarland has prepared this submission for Brimbank Council, in collaboration with Council officers and incorporating consultancy advice commissioned by Council from experts about specific components of the Draft 2022 Melbourne Airport 2022 Master Plan and Preliminary Draft Major Development Plan for Third Runway.

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	Attachment 3 - Preliminary draft Melbourne Airport 2022 Master Plan and Major Development Plan - Submission considering Human Rights, April 2022	

# 1. Introduction

Brimbank City Council (the "Council") welcomes the opportunity to contribute to the future planning and development of Melbourne Airport (the "Airport") through this submission to the preliminary draft 2022 Master Plan (Master Plan) and preliminary draft Major Development Plan for the Third Runway (MDP) currently on exhibition.

The Master Plan provides a comprehensive 20-year vision for development of the Airport comprising future land use and development including the runway network, terminal development access and other infrastructure and non-aviation development.

Melbourne Airport is one of the most significant gateways to Victoria and provides considerable social and economic benefits to the Victorian and surrounding communities, supporting economic development in Melbourne and Victoria.

Council acknowledges that the expansion of the Airport is likely to deliver some economic benefit to Brimbank, however when scrutinised, the Master Plan and MDP, fail to adequately demonstrate that the expansion of Melbourne Airport will not result in significantly greater disbenefits to our community through increased health, amenity environmental, economic and traffic impacts.

This submission provides Council's response to the Master Plan and MDP. For the reasons outlined in this submission, Council does not support the Master Plan or the MDP.

## 2. Executive Summary

Council has thoroughly analysed the Master Plan and MDP, with Council's internal experts reviewing the areas relating to access and traffic, environmental and cultural heritage, drainage and storm water and economic development. Council has also engaged external experts to provide a health risk assessment, an air quality assessment, noise modelling, a review of the applicable EPA legislation, an analysis of world's best practice compensation schemes (including successful noise amelioration programs) and a review the impacts on the human rights of its community.

Based on the analysis and findings of its external experts, Council submits that many of the metrics used to support the Master Plan and MDP are either not informed by an evidence-based approach, do not use world's best practice, rely on outdated information and legislation, ignore Melbourne Airport's context, and fail to adequately consider the health and wellbeing of Brimbank's residents and workers and those in neighbouring Local Government Areas (LGA's).

Council also submits that the most significant shortcomings of the Master Plan and MDP are:

- The failure to recognise the health impacts to existing residents in Brimbank and neighbouring municipalities from the current airport operations.
- The significant underestimation of the health impacts from increased aircraft noise on the Brimbank and surrounding community's wellbeing.
- The failure to consider any meaningful ways to reduce and mitigate the off-site impacts of the present and future operations of Melbourne Airport.

Council concludes that it does not support the Master Plan and MDP, due to the health impacts identified in Health Risk Assessment, which represent an unreasonable, unacceptable and inherently unfair risk to the Brimbank community, as well as the range of other significant impacts outlined in this submission.

Council's concerns are summarised under the following headings:

- Stakeholder engagement
- Health impacts (Noise and Public Safety)
- Air quality
- EPA legislation
- Compensation
- Human Rights
- Public Safety Area
- Access
- Environment
- Economic Development
- Statutory Planning

Council is seeking that the Federal Government progress a range of changes to minimise the harm to human health from aircraft noise, and improve airport planning and community consultation, including but not limited to:

- Undertaking a review of the aircraft noise system to minimise harm to human health and provide health impact guidance to protect community from aircraft noise. This should include the establishment of appropriate noise metrics that accord with health guidance established by World Health Organisation Environmental Noise Guidance 2018 (WHO Noise Guidance), and best practice noise prevention and amelioration measures to address noise exceedances,

including the establishment of a noise insulation program and compensation scheme.

- Requiring airports prepare Health Impacts Assessments (HIA), as part of the Master Plan and MDP, that are assessed against WHO Noise Guidance
- Require that the HIA undergoes an independent and expert peer review to ensure its veracity, and that the HIA and peer review are made available for public review.
- Entering into a bilateral agreement with the State Government in relation to any further development of the 2022 Draft Melbourne Airport Master Plan (or other Master Plan) and or the Major Development Plan for the Third Runway, specifically including:
  - Appointing a community forum, similar to the composition of that established for Brisbane Airport, or alternatively, appointing an Advisory Committee under section 151 of the Planning and Environment Act 1987, to provide a transparent, independent and public review process that enables impacted stakeholders to present their submissions for independent consideration.
  - Requiring an Environment Effects Statement under the Environment Effects Act 1978, including:
    - A Health Impact Assessment for off-site impacts, specifically including the assessment of noise impacts against the World Health Organisation Environmental Noise Guidance 2018, and relevant state legislation like the Environment Protection Act 2017
    - Prevention and amelioration measures to adequately address noise exceedances, including options for a federally funded noise insulation program, a noise curfew, voluntary property acquisition or other measures.
  - Requiring a Comprehensive Impact Statement process under the Major Transport Projects (Facilitation) Act 2009.
- Requiring that Melbourne Airport meet Victorian legislation, guidelines and standards, in relation to the offsite impacts from the existing and any expanded operations of Melbourne Airport.

Melbourne Airport is an important neighbour to Brimbank, and Council wants to build on its existing relationship with Melbourne Airport to:

- Improve Melbourne Airport's knowledge of the Brimbank community and impact of its operations on Brimbank
- Support Melbourne Airport to improve its engagement with the Brimbank community, to build community awareness and knowledge about the changes proposed under the Master Plan and MDP and the implications of the future expansion
- Ensure any public health impacts brought about by Melbourne Airport's current and future operation are appropriately addressed by Melbourne Airport, including existing concerns raised through the current consultation.
- To minimise the anticipated amenity impacts from the airport's expansion on the Brimbank community
- Build on the opportunities for Brimbank to benefit through employment creation and service provision supporting the operation of the Airport
- To engage in more detailed design relating to the runway network, access and other infrastructure, and non-aviation development, where there are impacts on Brimbank.

Any future work undertaken by Melbourne Airport for the Master Plan and MDP in response to this submission, should be made public to enable appropriate review,

analysis and feedback by the community and stakeholders it impacts and the general public.

A summary of Council's feedback and outcomes sought from the future development of the Master Plan and MDP are provided below:

## 2.1 Stakeholder and Community Engagement

- Provide for more focused consultation and communication with the surrounding community regarding the proposed changes to the Melbourne Airport, with an emphasis on the CALD community through multi-lingual information, opportunities for the less computer literate community members and the use of a less jargon and clear information explaining the proposed changes.
- Provide a framework for monitoring and auditing the anticipated outcomes of the Masterplan vision, with an undertaking that the findings of the audit are provided to the community through forum(s) such as the Community Aviation Consultation Group 1-2 times per year, with opportunities for these meetings to be hosted by the City of Brimbank and open to community.
- Continue to build the relationship with Council through regular Councillor Briefings 1-2 times per year to discuss the progress to prepare the Master Plan and MDP.
- Review established community and technical groups to improve their representation, transparency, accountability and communication.

## 2.2 Health Impacts (Noise & Safety)

- Acknowledge Melbourne Airport's role and responsibilities in addressing noise and its impacts on the surrounding community and land uses.
- Review the use of Australian Noise Exposure Forecast (ANEF) as the measure of noise disturbance to the community and use more appropriate measures that more accurately show noise impacts in the planning of new runways and flight paths.
- Prepare a legitimate, well founded and valid health impact assessment (HIA) in relation to the off-site noise impacts associated with the Master Plan and MDP, in accordance with World Health Organisation (WHO) Noise Guidance and the Environmental Protection Act 2017.
- Support an independent and expert peer review of the HIA to ensure its veracity, and that the HIA and peer review is made available for public review and comment.
- Ensure that any updated Master Plan and MDP responds to the HIA, and includes, but is not limited to, the identification of noise mitigation measures to adequately address and noise exceedances beyond WHO Noise Guidance, including options for a Federally funded noise insulation program, a noise curfew, voluntary property acquisition or other compensation measures.
- Support an independent expert review of the existing ANEF/N-contour systems to adequately protect the community's health and wellbeing, correctly identifying where high levels of aircraft noise/overflights will occur and development of a new noise metric to protect human health.
- Support improvements to noise complaint handling practices by introducing a register of complaints to be shared with neighbouring councils, the Environment Protection Authority (EPA) and accessible to the community. Key Performance Indicators (KPI's) should be developed to enable an assessment of how the actions undertaken have addressed the complaints made, and include a penalty system when KPI's are not met.

- Support and fund an appropriate network of Environmental Monitoring Unit (EMU's), including an EMU in Keilor Village to identify the existing areas currently impacted by aircraft noise and future areas that will also be impacted by the changes resulting from the Master Plan and MDP.
- Improve information about noise impacts and harm, with an emphasis on the CALD community and the less computer literate, and consider the use of a less jargon in the information provided.
- Commit to a program of engagement, in conjunction with Council, with the affected community in Brimbank, at least 2-3 times a year regarding the noise impacts prior to, and during the expansion of Melbourne Airport.
- Commit to further statutory consultation in relation to further development of the Master Plan and MDP to enable community and other stakeholders an appropriate opportunity to view, understand and provide feedback regarding the impacts on land and communities surrounding the airport.
- Support a transparent, independent and public approvals process, including a public review process that enables impacted stakeholders to present their submissions for independent and expert consideration about the Master Plan and MDP.
- Review the potential for more equitable noise sharing, by reconsidering the four runway configuration in consultation with neighbouring Council's, their communities and State and Federal Government.
- Implement noise mitigation measures based on national and international best practice including:
  - A noise insulation program in the areas within the ANEF 20 and ANEF 25 contours for residential premises, schools, childcare and early learning centres, aged care facilities and public buildings such as libraries and community centres.
  - A curfew between 11pm and 6am to minimise sleep disturbance that can lead to other adverse health impacts
  - Imposing noise abatement procedures that limits take-offs over the populated area within the Brimbank LGA; alternates the direction of take-offs to provide some respite to Brimbank residents from the aircraft noise; and or, limits aircraft during 11pm to 6pm to more modern and quieter aircraft
  - In the interim, extend the existing runway 27 to the east, to allow an increased use of the east/west runway, which provide a greater opportunity to noise share and deliver some respite to communities to the south and north of the airport.

### 2.3 Air Quality

- Commission an independent air quality assessment of the existing and proposed emissions from onsite and off-site operations detailing:
  - How the airport activities (current and proposed) are to be managed to minimise the risk of harm to human health or the environment of surrounding.
  - Melbourne Airport's compliance with the Environment Protection Act 2017 and any other relevant legislation, including clear recommendations detailing how any noncompliance will be rectified.
  - How Melbourne Airport will meet its General Environmental Duty (GED) to minimise risk to human health and the environment including appropriate modelling to assess their effectiveness in minimising emissions.

- Commission an independent assessment reviewing the existing and proposed noise emissions from Melbourne Airport and its operations on the Brimbank and surrounding community, assessed against the Environment Protection Act 2017, including:
  - How the airport activities (current and proposed) are to be managed to minimise the risk of harm to human health or the environment of surrounding.
  - Melbourne Airport's compliance with the Environment Protection Act 2017 and any other relevant legislation, including clear recommendations detailing how any noncompliance will be rectified.
  - How Melbourne Airport will meet its GED to eliminate such risks to human health and the environment or if it is not reasonably practicable to eliminate such risks, to be reduced so far as reasonably practicable.

## 2.4 Compensation

- Development of a best practice and equitable compensation scheme is required, including:
  - A Noise Amelioration Program that responds to WHO Noise Guidance, and relevant legislation.
  - Effective forms of compensation that are informed by an evidence-based approach.
  - Adequate opportunity for impacted owners of dwellings and buildings accommodating sensitive uses to review the compensation scheme and comment, and the public.

## 2.5 Human Rights

- Further work is required to determine the relation between aviation noise and people's health and well-being, and to ensure the needs of affected community and their human rights are not compromised by the Master Plan and MDP.
- Provide further opportunity for the general public to review and comment on the expert evidence and the conclusions outlining how Human Rights are proposed to be protected.

## 2.6 Public Safety Areas

- Accurately identify all properties within the Public Safety area (PSA) within the Master Plan and the MDP, and made publically available.
- Undertake appropriate consultation with all owners of properties within the Public Safety Area (PSA), including face-to-face meetings and allow an adequate opportunity for their review and comment.
- Introduce a scheme where properties within the PSA can be voluntarily offered by owners, at current market value, for purchase by Melbourne Airport/ Commonwealth, or alternatively compensation is paid for the loss of property value.

- Provide an appropriate opportunity for all owners with the PSA and the public to review and comment of the PSA purchase / compensation scheme, prior to its implementation.

## 2.7 Access

- An adequate assessment is undertaken of the impact that Melbourne Airport Rail will have on the future road access to the Airport in relation to potential reduction on reliance of vehicle access.
- Emphasise the importance of increased bus services connecting the airport locally and regionally.
- Emphasise the importance of a more balanced transport mode split regarding access to and from the airport. This includes greater analysis of the operation and ticket pricing for Melbourne Airport Rail to promote optimal use and modal shift by passengers and airport employees.
- Traffic modelling to be refined to more accurately reflect the anticipated future transport network serving Melbourne Airport, including Melbourne Airport Rail being in operation in the 2031 scenario.
- Further consideration be given to the Outer Metropolitan Ring Road (OMR) being delivered in a stages, with some level of connectivity to Melbourne Airport being modelled for in the 2031 scenario.
- A commitment from Melbourne Airport to work with Brimbank and surrounding councils to manage the construction impacts of the Airport on local roads.
- A more detailed assessment on the delivery of improved cycling connections is required (including along Arundel Road), with a focus on reducing car and bus transport to and from the airport.
- A commitment from Melbourne Airport to undertake preliminary planning with Council and the Department of Transport (DoT) regarding the western access and connection to Kings Road and the Calder Freeway, and include identifying and protecting the future road reservation through a Public Acquisition Overlay, an alignment that avoids Keilor Golf Course, and strategies to retain native vegetation and habitat connectivity.
- Identify capacity improvement to cater for traffic demand generated by Melbourne Airport, including a full diamond interchange at Calder Park Drive, widening and strengthening of the Maribyrnong River bridge and additional lanes /emergency lanes between Keilor Park Drive and Melton Highway prior to any additional traffic volumes being accommodated at the Kings Road interchange.
- A commitment from Melbourne Airport to bring forward the timeframes to 0-5yrs, for proposed local bus routes to Sunshine, St Albans and Watergardens
- Include the provision of a dedicated express service (i.e. SkyBus) from Sunshine Railway Station to the airport in advance of delivering the Melbourne Airport Rail project.
- A commitment from Melbourne Airport that trucks will be prohibited from accessing McNabb and Arundel Roads during any construction period, as these roads are not constructed to carry heavy loaded truck movements, while the Arundel Road Bridge over the Maribyrnong River is not suitable for fully loaded truck movements.

## 2.8 Environment

- Further detailed initiatives to minimise and reduce greenhouse gas emissions are undertaken, including but not limited to:

- Committing to 100% renewable electricity, including for landside operations
  - Engaging an independent expert to conduct a climate change impact assessment to model the impact of the third runway on emissions
  - Commit to achieving a Level 4 Transformation or above within a set timeframe.
- A commitment to deliver sustainable transport connections including rail, bus and cycling within 0-5 years and detailing how this will be achieved.
  - A commitment to develop a coordinated integrated water management plan to reduce storm water flows into waterways, improve water quality and peak flow levels
  - A commitment to review and adjust water quality targets to provide opportunities for improvement of water quality.
  - A commitment to incorporate stormwater treatment systems that aim to mimic natural water flow patterns of the region.
  - Commit to regular updates from Melbourne Airport's Environment and Sustainability Team to the CACG and Planning Coordination Forum (PCF).
  - A commitment to proactive and coordinated land management efforts across and municipal boundaries, including pest plant and animals control programs
  - Engage an independent expert to determine the significant environmental management requirements and mitigate impacts on landscape and scenic values with the Deep Creek and Maribyrnong River boundary, and share with impacted councils and stakeholders to enable an integrated and collaborative approach to land management
  - Engage an independent expert to determine the impact of odour (fumes) on surrounding communities, and detail clear mitigation measures to provide reassurance to the community regarding their safety, and share with relevant government agencies and councils to promote assurances about future management.
  - Clearly detail the environmental impacts associated with the proposed western connection to the Airport, and undertake early engagement with Council
  - Engage an independent expert to review the Targets and Actions for Biodiversity and Conservation in the Environment Strategy, focusing on conservation values, with regards to pest plant and animal control across the site, inclusive of all waterways and conservation/recreation areas.
  - Demonstrate more clearly how Melbourne Airport will become a model environmental leader in the rapid transition away from fossil fuels by having specific reference to short and medium-term targets and KPI's that are publicly available and consistent with Victoria's net-zero by 2050 legislated climate target, and other strategic documents such as the integrated water management plans for the Maribyrnong and Yarra catchments in the Master Plan.
  - Strengthen Melbourne Airport's stewardship responsibilities through stronger commitments to coordinate conservation land management activities with surrounding land managers.

- Engage an independent expert to review the Targets and Actions for land, surface water and groundwater management in the Environment Strategy to ensure improved outcomes for the environment will result.
- Clearly identify key vectors of weed invasion, and detail how these risks will be mitigated and managed, including during the earthworks, and standards for imported fill.
- Clearly identify and detail the impacts of habitat disturbance, lighting and noise on fauna, and the specific mitigation(s).
- Melbourne Airport engage an independent expert to review, clearly identify and detail the impacts and management strategies on the existing fauna, listed threatened species and ecological communities

## 2.9 Economic Development

- Detail how the Master Plan and MDP will mitigate any negative economic impacts from the airports existing and future operations e.g. amenity impacts that can reduce property values and restrictions on development.
- Detail how the Master Plan & MDP will mitigate any negative economic impacts from the airports existing and future operations on Brimbank e.g. amenity impacts that can reduce property values and restrictions on development.
- Detail how Melbourne Airport will partner with Council to develop local employment, service delivery and procurement policies and practices with a positive prejudice toward business services in neighbouring municipalities
- Detail how Melbourne Airport will partner with Council to introduce employment programs and/or work collaboratively with Council's 'Local Jobs for Local People Program' to deliver actual jobs to local people, increasing employment opportunities through apprenticeships, training, employment pathways, etc. for our community at Melbourne Airport and in related industries and operations.
- Establish employment targets regarding the number of people employed at Melbourne Airport from Brimbank and neighbouring LGAs and share this information bi-annually with councils.
- Commit to the promotion of employment opportunities at the airport, with consideration to local Jobs Fairs, Brimbank Joblink and an Employment Accord with Council.
- Detail how Melbourne Airport will work with local educators to promote jobs training and career pathways at the Airport
- Detail how Melbourne Airport will strengthen links with the Sunshine National Employment and Innovation Cluster, including the Sunshine Metropolitan Activity Centre and the Sunshine Health, Wellbeing and Education Precinct focused around the Sunshine Hospital.
- Detail how Melbourne Airport will promote future technology changes, including automated vehicles and the impact on future land use and development, and advanced aircraft technology, including electronic engines and other advancements that will promote production of quieter aircrafts.
- Detail how Melbourne Airport will partner with Council and Western Melbourne Tourism to develop and promote tourism opportunities for Melbourne's west and

Sunshine e.g. by commemorating the role of Sunshine and HV McKay in the creation of the Royal Flying Doctors Service through a mural at the Airport.

## 2.10 Statutory Planning

- Identify the importance and implications for affected property owners and future owners associated with any delay by the State Government in updating the Melbourne Airport Environs Overlay to reflect the 2022 ANEF in the Master Plan.
- Identify the importance and implications for affected property owners and future owners associated with the Obstacle Limitation Surface (OLS) and commit to working with the State Government to develop an Overlay for the Obstacle Limitation Surface within the Victorian Planning Provisions.
- Consider the role of the surrounding green wedge land and limits on viable uses for property owners, including the role of Melbourne Airport in future planning for green wedges, and funding a potential compensation scheme.

### 3. Background

Brimbank is strategically located at the centre of Melbourne's west comprising the areas of Deer Park, Keilor, St Albans, Sunshine and Sydenham. Brimbank is bordered by the western growth area municipalities of Wyndham and Melton and as the fifth most populous metropolitan municipality, Brimbank covers 123 square kilometres with a culturally diverse community of 208,443 residents (Estimated Resident Population 2017) who speak over 90 different languages where English is not a first language for 58.4% of residents (Brimbank Profile ID 2016).

Brimbank has the attributes driving regional growth including a central location in Melbourne's West, road and transport connections including metropolitan and regional rail, access to a growing labour force and land including the second largest supply of industrial land in Melbourne's West. With over 13,000 businesses providing 82,333 jobs, significant business sectors in Brimbank include construction, logistics, rental/hiring/real estate services, professional/scientific/technical services, retail trade and manufacturing (Brimbank Profile ID 2016).

Melbourne Airport is located within the City of Hume near the southern municipal boundary adjoining the City of Brimbank and has a substantial presence and interface with the Tullamarine and Keilor Park industrial precincts, the Brimbank Green Wedge area, the Maribyrnong River and residential land.

Brimbank's established residential areas of Keilor, Taylors Lakes, St Albans and Sunshine (including Sunshine North) are located beneath existing flight paths. These areas include a combined area of 3547 hectares and 23,750 dwellings (Brimbank Profile ID 2016). Neighbouring suburbs are also impacted by these flight paths.

### 3.1 Melbourne Airport

The Melbourne Airport is situated on land leased from the Commonwealth by Australia Pacific Airports (Melbourne), with the airport being originally operated by the Commonwealth Government until 1977.

The airport lease requires that the airport site be developed as a Major International Airport and have regard to:

- a. The future growth in and pattern of traffic demand for the airport side
- b. The quality standards reasonably expected of such an airport in Australia
- c. Good business practises
- d. The lessee must at all times provide for access to the airport by intrastate, Interstate and international air transport

The airport covers approximately 2741ha, with around 2650ha of Commonwealth leased land and about 90ha of freehold land all located in the City of Hume.

In 1939, the Commonwealth Minister for Defence identified the need for a new airport site in Melbourne to replace the Essendon airport.

The Tullamarine site was chosen because it offered the opportunity for long-term growth combined with convenient access to Melbourne CBD.

The land was formalised for this purpose in 1959, with much of the existing airport infrastructure including the two runways and main terminal complex constructed in the 1960s, with international flights commencing in 1970, followed by domestic flights in 1971.

A condensed history of Melbourne Airport is provided below in Table 1:

*Table 1*

<b>Year</b>	<b>Action</b>
1939	The Federal Government identified a need for a new airport for Melbourne
1959	Tullamarine is announced as airport site comprising 2 runways
1960's	The future of the airport to comprise 4 runways
1990	Airport Strategy – confirmed the future 4 runways
1998	Four (4) runways shown in the Master Plan
2003	Master Plan identified the need for 3 <sup>rd</sup> runway in 20 years
2013	Master Plan identified the east west runway as a 3 <sup>rd</sup> runway
2018	Master Plan confirmed the east west runway as a 3 <sup>rd</sup> runway
2022	Draft 2022 Master Plan introduces a 3 <sup>rd</sup> runway, orientated north south parallel to the existing north south runway.

Melbourne Airport is Australia's second largest airport, the 26th largest in Asia Pacific region and the world's 58th largest airport, based on 2019 passenger numbers.

Notably, Melbourne Airport it is now the largest major airport on the eastern seaboard that does not have a curfew operating, 24 hours a day, 365 days a year and providing it significant competitive advantages over other Australian airports.

Most airline operations are between 6:00 AM and 11:00 PM, which create two significant peaks for aircraft movements. The first is in the morning with a second in the afternoon to evening.

The morning peak is the combined result of international arrivals and domestic day passengers, while the evening peak is driven more by domestic day return passengers, as illustrated in Table 2.

Table 2

<b>Comparison &amp; Forecasting</b>	<b>2018/19</b>	<b>2041/42</b>
Passenger numbers	37 Million	77 Million (83 Million in 2046)
Freight/tonnes	488,000	980,000
Air movements	246,000	429,000
Car trips	130,000	270,000

In 2019, 43 airlines operated an average of 987 international and 3563 domestic flights to over 74 destinations from Melbourne Airport, in the same year it handled 37.1 million domestic (70%) and international passengers (30%).

Melbourne Airport currently operates two intersecting runways in a cross style configuration, with one runway oriented north south and the other east west.

The ability to use its runways is largely driven by weather conditions. Pilots typically operate towards the wind. However, aircraft can operate with some component of crosswind and to a lesser extent, with a component of tail wind

Wind patterns at Melbourne airport are generally north east for most of the year but during summer there is a more southerly component to the prevailing winds, resulting in the existing east West runway having a crosswind component for a large part of the year.

Air Traffic controllers generally nominate which runway a pilot will use depending on certain criteria, with weather conditions being the most prevailing consideration.

Melbourne Airport is operated by Australia Pacific Airports (Melbourne) Pty Ltd (APAM). Under the *Commonwealth Airports Act 1996* (Airports Act), the Master Plan and MDP require the approval of the Minister for Infrastructure, Transport, Regional Development and Communications, currently the Hon. Barnaby Joyce.

APAM has a responsibility to comply with relevant Commonwealth legislation including:

- Airports (Environment Protection) Regulations 1997
- Environment Protection and Biodiversity Conservation Act 1999.

Regard should also be given to Victorian legislation, including where there are off-site impacts, and this includes the Environment Protection Act 2017.

In accordance with the Airports Act, APAM are required to consult:

- (a) The Minister of the State in which the airport is situated, with responsibility for town planning or use of land;
- (b) The authority of that State with responsibility for town planning or use of land;
- (c) Each local government body with responsibility for an area surrounding the airport.

While State Government approval is not required, the State Government or individual Ministers and departments, can be submitters to the statutory consultation process for the Master Plan and MDP.

#### 4.1 The Melbourne Airport Environs Overlay & Noise contours

The Victorian Government has long planned for the protection of Melbourne Airport, with planning controls aimed at protecting the four-runway layout in place since 1990.

The Melbourne Airport Environs Overlay (MAEO) is a planning control that was introduced by the Victorian Government in 2007, noting that planning controls for airport noise have applied to land in the Cities of Brimbank, Hume, Melton and Moonee Valley (and former councils) since 1992.

The Purpose of MAEO at Clause 45.08 of the Brimbank Planning Scheme is to:

- *To implement the Municipal Planning Strategy and the Planning Policy Framework.*
- *To ensure that land use and development are compatible with the operation of Melbourne Airport in accordance with the relevant airport strategy or master plan and with safe air navigation for aircraft approaching and departing the airfield.*
- *To assist in shielding people from the impact of aircraft noise by requiring appropriate noise attenuation measures in dwellings and other noise sensitive buildings.*
- *To provide for appropriate levels of noise attenuation depending on the level of forecasted noise exposure.*

The MAEO can limit the number of households, schools, child-care centres and other sensitive uses in areas exposed to moderate and high levels of aircraft noise, to ensure land use and development remains compatible with the 24- hour, 7 day a week operation of Melbourne Airport.

The MAEO identifies areas that will be subject to moderate to high levels of forecast aircraft noise, based on the Commonwealth-approved Australian Noise Exposure Forecast (ANEF), which is the current, longstanding measurement of noise disturbance to the community, under or near existing and planned runways and flight paths.

The MAEO measures are guided by the Australian Standard 2021-2015: Acoustics - Aircraft noise intrusion – Building Siting and construction and include insulation and window treatments.

The areas where these controls apply are determined by an airport's forecast aircraft noise exposure contours (ANEF). These contours align with the flight paths in use when an airport is operating at its ultimate capacity.

Airservices Australia endorses each airport's ANEF for technical accuracy. The ANEF is included within approved airport master plans and is the agreed metric applied in all planning jurisdictions for statutory planning purposes.

Council's principal concern with the Master Plan and the MDP is that the documents ignore world's best practice regarding noise and its impacts on public health. The WHO Noise Guidance highlights noise metrics and the impact on human health when exceeded, demonstrating that the current approach to airport planning is inadequate

and out of date. Notably, the ANEF metric was intended to guide planning outcomes but is not a measure of harm from noise. Recent research around noise harm identifies that noise impacts are occurring at a lesser metric i.e. ANEF10, as opposed to the current accepted metric ANEF20. As is outlined later in this submission, the Master Plan and MDP need to be reviewed to consider and respond to contemporary research and best practice.

## 4.2 National Airports Safeguarding Framework

Clause 18 of all Victorian Planning Schemes requires consideration be given to the National Airports Safeguarding Framework (NASF). The NASF includes several guidelines to protect airport operations and ensure community safety from those operations.

In 2020 the Melbourne Airport Environs Safeguarding Standing Advisory Committee was convened to consider the introduction of the NASF guidelines as planning controls in the Victorian planning system.

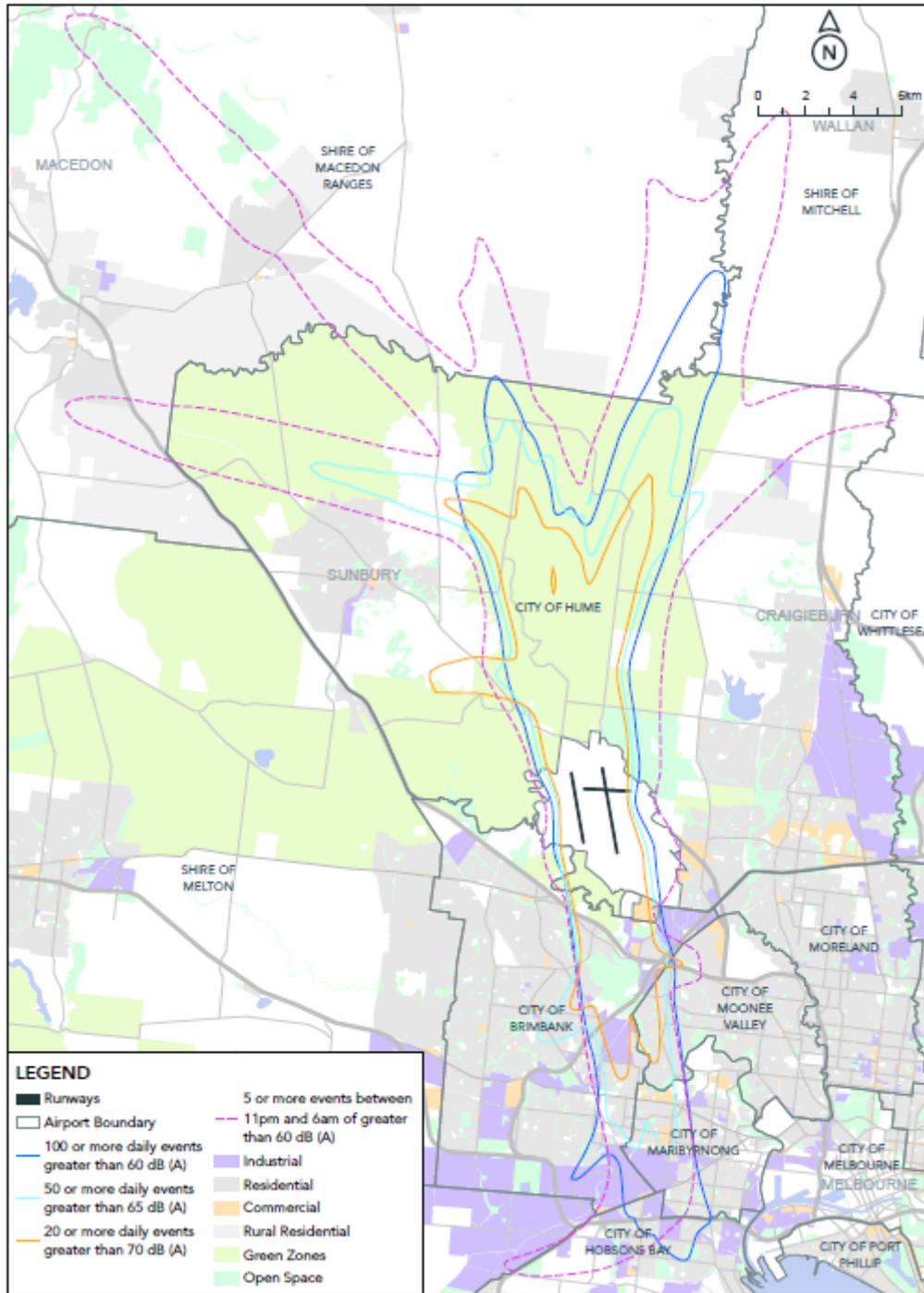
One of the controls proposed to be included was an alternative noise metrics (known as 'N' Contours or 'Number Above' Contours)

'N' Contours indicate potential noise exposure where the noise level from a single aircraft exceeds 60dB (A), 65dB (A) or 70dB (A) per day, as opposed to the annual average approach that informs the application of ANEF Contours.

Where 'N' contours exist, they should be examined when considering strategic planning proposals near airports, for example, a proposal to rezone land to facilitate more intensive residential development within airport environs. These contours would be additional to the ANEF contours, which remain the metric applied in Victoria for statutory planning purposes through the Airport Environs Overlay and MAEO.

The diagram below is sourced from the 2022 Master Plan and shows the N-contours for the third runway to 2046.

Long range N-contours for third runway to 2046



Source: Draft 2022 Melbourne Airport Master Plan

## 5. Key Concerns

Council acknowledges, the growth and development of Melbourne Airport delivers a range of significant economic benefits to Brimbank, however, there are a range of impacts that would also result in significant disbenefits. These key concerns are outlined below.

### 5.1 Health Impacts (Noise & Safety)

The most significant impact on Brimbank is aircraft noise. The 2022 ANEF 25 contour impacts areas of Keilor, Keilor Park and Keilor North in Brimbank, while the ANEF 20 contour extends as far south as Sunshine North and covers the suburbs of Keilor, Keilor Park and Kealba.

Council has engaged the expert advice Tonkin & Taylor, to undertake a health risk assessment and air quality assessment (HRA). The HRA is led by Dr Lyn Denison, a qualified scientist specialising in air quality and health risk assessment. The HRA includes noise modelling undertaken by noise experts, Marshall Day, as well as targeted community engagement, including Brimbank residents who have previously engaged with Council about Melbourne Airport, education stakeholders and Brimbank residents who are members on the Community Consultation Aviation Group. A copy of the 'Melbourne Airport Expansion Health Risk Assessment' shown at **Attachment 1**.

Dr Denison has identified in her findings that guidelines in the World Health Organisation Environmental Noise Guidelines (2018) (WHO Noise Guidance) is exceeded across the areas within the ANEF 20 and ANEF 25 contours, indicating that there is an increased risk of adverse health effects within the exposed population.

The noise impacts extend over a significant area of Brimbank, which is evident in table below, which shows the increase in noise level and quantity of overflights for selected school locations in Keilor, Kealba and North Sunshine. Individual events will often be much louder, with community currently reporting events in excess of 100 decibels. More schools, kindergartens and early childcare centres are impacted than those listed below, which are selected to demonstrate the extent of impact.

Table 3

Address	Current overflight noise events	Third runway 2026	Third runway 2046	2020 Enrolment numbers
Overnewton Anglican Community College – Senior Campus (2-30 Overnewton Road, Keilor)	<ul style="list-style-type: none"> <li>• 50 - 99 N60 24 hrs</li> <li>• No events at N70</li> </ul>	<ul style="list-style-type: none"> <li>• 200+ N60 24 hrs (Option 1 and 2)</li> <li>• 200+ N70 24 hrs (Option 1)</li> </ul>	<ul style="list-style-type: none"> <li>• 200+ N60 24 hrs (Option 1 and 2)</li> <li>• 200+ N70 24 hrs (Option 1 and 2)</li> </ul>	1089
Keilor Primary School (25 Kennedy Street, Keilor)	<ul style="list-style-type: none"> <li>• 100-199+ N60 24 hrs</li> <li>• 20-49 N70 24 hrs</li> </ul>	<ul style="list-style-type: none"> <li>• 200+ N60 24 hrs</li> <li>• 200+ N70 24 hrs (Option 1 and 2)</li> </ul>	<ul style="list-style-type: none"> <li>• 200+ N60 24 hrs</li> <li>• 200+ N70 24hrs (Option 1 and 2)</li> </ul>	486

Kealba Kindergarten (24 McShane drive, Kealba)	<ul style="list-style-type: none"> <li>• 20-49 N60 24 hrs</li> <li>• No events at N70</li> </ul>	<ul style="list-style-type: none"> <li>• 200+ N60 24 hrs (Option 1)</li> <li>• 100-199+ N60 24 hrs (Option 2)</li> <li>• 5-9 N70 24 hrs (Option 1)</li> <li>• 20-49 N70 24 hrs (Option 2)</li> </ul>	<ul style="list-style-type: none"> <li>• 200+ N60 24 hrs (Option 1 and 2)</li> <li>• 20-49 N70 24 hrs (Option 1)</li> <li>• 50-99 N70 24 hrs (Option 2)</li> </ul>	Not yet provided
Phoenix Street Children's Centre (72A Phoenix Street, Sunshine North)	<ul style="list-style-type: none"> <li>• 20-49 N60 24 hrs</li> <li>• No events at N70</li> </ul>	<ul style="list-style-type: none"> <li>• 200+ N60 24 hrs (Option 1)</li> <li>• 100-199+ N60 24 hrs (Option 2)</li> <li>• 10-19 N70 24 hrs (Option 1)</li> <li>• 5-90 N70 24 hrs (Option 2)</li> </ul>	<ul style="list-style-type: none"> <li>• 200+ N60 24 hrs (Option 1 and 2)</li> <li>• 5-9 N70 24 hrs (Option 1 and 2)</li> </ul>	Not yet provided
Sunshine North Primary School (65-71 Suffolk Street, Sunshine North)	<ul style="list-style-type: none"> <li>• 20-49 N60 24hrs</li> <li>• No events at N70</li> </ul>	<ul style="list-style-type: none"> <li>• 200+ N60 24hrs (Option 1)</li> <li>• 100-199+ N60 24 hrs (Option 2)</li> <li>• 10-19 N70 24hrs (Option 1)</li> <li>• 5-9 N70 24 hrs (Option 2)</li> </ul>	<ul style="list-style-type: none"> <li>• 200+ N60 24hrs (Option 1 and 2)</li> <li>• 10-19 N70 24hrs (Option 1 and 2)</li> </ul>	272

**Note:** the number of overflights change according to the runway options (e.g., option 1, 2 or 3) proposed in the MDP.

Dr Denison identifies that the metrics used in the Master Plan are those specified by AS2021-2015 which are based on amenity impacts, not health impacts, and that these do not take into account the more recent information on the health effects of noise by enHealth and WHO Noise Guidance. On this basis the values used by the Master Plan are not consistent with the metrics recommended by the WHO Noise Guidance, which have been developed to protect against long-term exposure to aircraft noise.

Melbourne Airport conclude that despite some health impacts, overall the beneficial health outcomes that affect mortality outweigh the less-serious negative health outcomes of sleep disturbance, annoyance and communication interference.

However, the expert advice provided by Dr Denison is that the Master Plan and MDP lack sufficient information and detail to fully comprehend and determine the implications and economic costs relative to the health, wellbeing and environment of the Brimbank community, and that this work should be undertaken, similar to the approach taken for other international airports.

Dr Denison prepared an assessment of the forecast aircraft noise levels against the WHO Noise Guidance and concluded that there is a risk of harm to human health, based on:

- Noise levels in the Australian Noise Exposure Forecast (ANEF) 20 and 25, exceeding WHO Noise Guidance threshold for annoyance, sleep disturbance, and cognitive development in children.

- The significant increase in traffic on local and declared roads, and the notable absence of an air quality assessment.

Council considers that a significant deficiency in the Master Plan and MDP is that no information is provided in the documents detailing how the off-site noise and air quality impacts will be prevented or minimised, in accordance with the Environment Protection Act 2017.

Best practice demand most international airports provide a range of noise mitigation measures to address noise including funded noise insulation schemes, compulsory acquisition, a curfew, and noise abatement procedures.

It is evident in Dr Denison's findings that the health impacts alone represent unreasonable and unacceptable risks to the Brimbank community.

It is also evident that Melbourne Airport has given no genuine consideration of the health implications to Brimbank's residents or any effective ways to reduce and mitigate these impacts.

Dr Denison undertook three separate focus group sessions and some individual discussions, with residents and schools under the current and proposed flight paths. A summary of their responses is provided below:

- Residents participating in the community engagement sessions raised serious concerns that the expansion of the airport will make the situation they are currently experiencing regarding their health and quality of life, much worse.
- People in Keilor Park, Keilor Village and Kealba all stated that the current situation is intolerable, as they were:
  - Only getting a maximum of 3-4 hours sleep per night and that is highly disturbed
  - Having to spend nights away from their home in order to get some sleep
  - Getting no respite from aircraft taking off
  - unable to open windows in their homes, due to the increase in noise when opened
  - unable to use the outdoor space at their homes
  - unable to hold conversations when planes were taking off and in some cases the noise was quite painful
  - unsure how they will be able to live in their current homes with an increase in flights proposed with the current plan for the airport expansion.
- A lot of older residents stated that they were depressed and are being treated by a medical professional for anxiety and depression as a result of the aircraft noise, which will only worsen with the expansion.
- Residents are unable to enjoy their homes and feel they need to sell but don't think that anyone would purchase them
- Several residents commented that they are unable to use Brimbank Park for exercise and recreation due to the aircraft noise, which is predicted to get worse with the Airport expansion.
- All the people who attended the focus groups have attended several community consultation sessions run by the Melbourne Airport Corporation and have similar concerns around the HIA but many have felt their concerns have been publicly dismissed, leaving them feeling frustrated and helpless.

Perhaps the most significant concern with the Master Plan and MDP from the residents that attended the focus groups, is their significant distrust of Melbourne Airport, which is detailed by Dr Denison's in her findings, below:

*"Some of the residents in Kealba and Keilor Village questioned the accuracy of the noise predictions developed by the Airport Corporation as part of their Master Plan. A number said that according to the interactive noise tool their houses are shown as not currently being impacted by the noise from aircraft, however they are unable to sleep due or enjoy their outside areas due to the aircraft noise. Some had conducted noise monitoring at their homes and had recorded noise levels between 70 and 80 dB which is not consistent with the information provided in the noise tool when their addresses were entered into the system. This has raised concerns about the accuracy of future predictions of noise when the current experience at their homes is that they are impacted more severely than the noise tool is predicting."*

Dr Denison's work also identified:

The current 'State of Knowledge' on the adverse health effects of aircraft noise indicates that there are impacts from the current and proposed operations of the airport on the exposed community in Brimbank.

The impact of the current operations on the local community as identified during the stakeholder engagement process includes sleep disturbance and anxiety and depression. These are occurring at current flight numbers, which will significantly increase under the proposed third runway development and will impact a larger proportion of the Brimbank LGA.

The Health Risk Assessment quantifies, where possible, the potential impact on the Brimbank community from the aircraft noise predicted for the Airport expansion.

The main health effects associated with environmental noise are:

- Annoyance
- Sleep disturbance
- Increase in ischaemic heart disease
- Cognitive impairment
- Psychological effects including anxiety and depression.

Dr Denison's report also describes the use of risk characterisation to estimate potential risks associated with exposure to noise from the proposed airport operations. For the assessment of health effects where there is a known threshold for effect, the metric accepted by health authorities including WHO, is that a hazard quotient of '1' or below is an acceptable risk level. Hazard quotients greater than '1' indicate an increase in the risk of adverse health effects and that mitigations should be considered to minimize risk to acceptable levels.

A summary of the findings of Dr Denison's work in relation to the main health effects associated with environmental noise resulting from existing operations and the expansion of the Melbourne Airport is provided below:

#### *5.1.1 Annoyance*

- WHO derived a guideline value of 45 dB to protect the population from being highly annoyed by aircraft noise and other adverse health effects such as increases in cardiovascular disease. The WHO acknowledge that at this level there would still be 10% of the population highly annoyed by noise.
- The ANEF 25 contour extends across the suburbs of Keilor, Keilor Park, Keilor Village and parts of Kealba. This means that 45% of the population within this

contour would be highly annoyed by the aircraft noise. The hazard quotient is 1.5 which is a 50% increase of the population impacted compared with areas that would meet the WHO guideline.

- This would indicate that there would be increases in cardiovascular disease within that population in addition to annoyance and potentially impacts on cognitive development and that a significant percentage of the adult population are potentially at risk for increases in depression and anxiety.
- The ANEF 20 contour extends as far south as North Sunshine, with the hazard quotient for the population living within this contour is 1.4, which is a 40% increase in people highly annoyed compared with areas that would be compliant with the WHO guideline.
- The total population in the 2022 ANEF 20 and 25 contours is predicted to be 15,745 by 2041 and it is estimated that 6,300 people would be highly annoyed by aircraft noise in 2041. It is highlighted that updates to the Master Plan, each five years, is likely to expand the ANEF, and therefore impact a larger population.

#### *5.1.2 Sleep disturbance*

- The WHO has established a Lnight guideline of 40 dB to protect against highly disturbed sleep. They acknowledge that this guideline is not fully protective of health as it implies that approximately 11% of the population may be characterized as highly sleep disturbed at the Guideline level.
- ANEF 25 contour corresponds to a Lnight value of 58 dB, this would mean that approximately 32% of the population within the ANEF 25 contour would be highly sleep disturbed. While, of those in the ANEF 20 contour, approximately 25% of the population would be highly sleep disturbed.
- The hazard quotients for the ANEF 25 and ANEF 20 contours are 1.5 and 1.3 respectively, resulting in a 50% increase in people highly sleep disturbed in the ANEF 25 and 30% in the ANEF 20 contours compared to areas that meet the WHO Lnight guideline.
- People in older age groups, i.e. over 65, and children form vulnerable groups in relation to sleep disturbance.
- For people over 65 years of age exposure to high levels of environmental noise, including aircraft noise can increase the prevalence of cardiovascular disease, as well as increases in anxiety and depression.
- WHO guidelines indicate that there could be an increase of approximately of 24% and 20% in anxiety and depression in that population that are with within the ANEF 25 and ANEF 20 contours, respectively.
- 27.8% of the population in Brimbank currently suffer from anxiety and depression, while the deaths per 100,000 population for ischaemic heart disease and cardiovascular disease are higher in Brimbank compared to the rest of Victoria.
- For children, sleep disturbance can lead to the inability to concentrate the following day which can impact on their cognitive development

#### *5.1.3 Cognitive Development in Children*

- Aircraft noise has been associated with delays in cognitive development in children.
- WHO identified that:
  - At a Lden level of 55 dB there is a 1 month delay in reading and oral comprehension in children compared to children in lower noise areas.
  - For every 5 dB increase above Lden of 55 dB there is additional 1-2 month delay.

- Using the 45dB the hazard quotient for cognitive development is 1.4 and 1.5 for the ANEF 20 and ANEF 25 contours respectively.
- For the areas in Brimbank within the ANEF 20 & 25 contours, this could result in a delay in reading and oral comprehension of between 3 and 5 months compared to children in lower noise areas.
- This means that for children in Brimbank living and going to school within the ANEF 20 and 25 contours, the increase in noise resulting from the expansion of the Melbourne Airport as proposed in the 2022 Master Plan would have their cognitive development delayed.
- The proportion of children assessed as being developmentally on track in the language and cognitive skills is notably lower in Brimbank (79.3%) than in Greater Melbourne (85.3%).
- Brimbank already has the third lowest proportion of children who were assessed as being on track for language and cognitive skills, compared to Greater Melbourne and the increased noise resulting from the airport expansion will likely exacerbate this.
- Approximately 18% of the population in the suburbs within the ANEF 20 and ANEF 25 contours is between the ages of 1 and 14 years of age, indicating significant number of pre-school and school aged children that may have their cognitive development impacted by the noise from the aircraft noise from the proposed Airport Expansion.
- These effects are due to direct impacts during the day as well as impacts due to sleep disturbance which may occur outside the normal night hours of 11pm to 6am.
- There are several ways in which aircraft noise could influence children's cognition:
  - lost teaching time - as a teacher may have to stop teaching whilst noise events occur
  - teacher and pupil frustration
  - annoyance and stress responses
  - reduced morale
  - impaired attention
  - children might tune out the aircraft noise and over-generalise this response to other sounds in their environment missing out on information; and
  - sleep disturbance from home exposure which might cause performance effects the next day.
- There are eight schools and childcare/early learning centres, which are predicted to be exposed to noise levels above the WHO guideline meaning that there is an increased risk of delays in reading and oral comprehension.
- This is likely to be worse for children who also live in these areas as they will also be exposed to aircraft noise in their home environment.

#### *5.1.4 Risk Mitigation*

- Examples of aircraft noise mitigation measures and government funded schemes for communities surrounding Airports can be found in Australia and overseas.
- These mitigation measures can be separated into active and passive noise abatement measures, where active measures relate to internal changes of flight paths, flight times, and aircraft models, and passive measures are more community-focused measures.
- European examples provide a framework for best practice measures to provide good passive noise abatement programs that assist pre-existing

homes mitigate the impact of noise on the residents. Examples are available from Heathrow and Frankfurt regarding retro fitting sound insulation treatments, with similar programs implemented in Australia under the Sydney Airport Noise Amelioration Program and the Commonwealth Noise Insulation Scheme for areas surrounding Adelaide airport.

- Using the criteria of the previous Commonwealth Noise Insulation Scheme, all affected areas in the Brimbank LGA would have been able to apply for the scheme that insulated buildings from aircraft noise.

### *Recommendation*

- That the State and Federal Government require that Melbourne Airport prepare a legitimate, well founded and valid health impact assessment (HIA) in relation to the off-site noise impacts associated with the Master Plan and MDP, in accordance with WHO Noise Guidance and the Environmental Protection Act 2017.
- The State and Federal Governments require that the HIA undergoes an independent and expert peer review to ensure its veracity, and that the HIA and peer review is made available for public review and comment.
- That Melbourne Airport prepares an updated Master Plan and MDP, which responds to the HIA, and includes, but is not limited to, the identification of noise mitigation measures to adequately address and noise exceedances beyond WHO Noise Guidance, including options for a Federally funded noise insulation program, a noise curfew, voluntary property acquisition or other compensation measures.
- An independent review of the existing ANEF/N-contour systems to adequately protect the community's health and wellbeing, correctly identify where high levels of aircraft noise/overflights will occur and consideration of whether a new noise metric is required.
- That the Federal Government require Melbourne Airport to undertake further statutory consultation to enable community and other stakeholders appropriate opportunity to view, understand and provide feedback regarding the impacts on land and communities surrounding the airport.
- The need for the Federal Government to commit to a transparent, independent and public approvals process, including a public review process that enables impacted stakeholders to present their submissions for independent and expert consideration.
- Melbourne Airport address noise abatement procedures particularly at night-time and review the potential for noise sharing, by reconsidering the four runway configuration in consultation with neighbouring Council's, their communities and State and Federal Government, alternatively the following should be considered.
  - A curfew between 11pm and 6am to minimise sleep disturbance that can lead to other adverse health impacts
  - Where possible limit the take-offs over the populated area within the Brimbank LGA
  - Alternate the direction of take-offs to provide some respite to Brimbank residents from the aircraft noise
  - Limit aircraft during these hours to more modern and quieter aircraft
  - In the interim, extend the existing third runway 27 to the east, to allow an increased use of the east/west runway, which provide a greater opportunity to noise share and deliver some respite to communities to the south and north of the airport.

## 5.2 Air Quality

The HRA prepared by Tonkin & Taylor included an air quality assessment by Dr Denison.

Dr Denison indicates that the assessment, including air dispersion modelling, was conducted by Melbourne Airport Corporation and reviewed by GHD Pty Ltd.

Scenarios for construction as well as operations in 2026 and 2046 have been modelled and include airport operations and associated increases in traffic on the airport land. Off-site impacts have been modelled for these sources at a limited number of sensitive receptors.

The Environment Protection Act 2017 (the EP Act), and subordinate legislation came into effect on 1 July 2021 and is designed to drive environmental improvements by ensuring that individual industries take responsibility for the risks they pose to human health and the environment.

Central to the EP Act is the 'General Environmental Duty' (GED), which requires all duty holders (businesses, industries, community etc.) to understand, abate and manage their emissions to minimise the risks of harm to the environment and human health. Complying with the GED requires both being proactive and employing industry best practices to minimise risk to human health and the environment, so far as reasonably practicable.

The new EP Act came into force the same time as the Environmental Reference Standards (ERS) came into force. The ERS provide reference standards against which the impact of a development or operating business can be assessed.

The ERS for air quality adopted the air quality standards in the National Environment Protection (Ambient Air Quality) Measure. Although the ERS are not compliance standards they are used by Government Agencies in decision making processes around new developments and assessment of meeting the requirements of the GED

Prior to 1 July 2021, the State Environment Protection Policies – Ambient Air Quality and Air Quality Management, provided the framework for assessing and managing emissions to air in Victoria, however the policies were revoked post that date, meaning they now have no legal standing.

The ERS have recently been updated in February 2022 to include the new and in some areas more stringent standards.

The EPA has also released the Guideline for Assessing and Minimising Air Pollution in Victoria (2022), providing guidance on:

- how to meet the requirements of the GED with respect to air quality assessments,
- assessing best practice
- 'as low as reasonably achievable' emission controls
- establishes air quality assessment criteria (AQAC) against which air dispersion modelling results can be compared.

The AQAC replace the design criteria in the previous SEPPs.

An additional and significant failing of the MDP is that Melbourne Airport has chosen to utilise revoked (i.e., not legally valid) and less stringent criteria to measure compliance regarding the off-site impacts regarding Air Quality, and not those currently applicable in

Victoria. The deficiency in the detail of Melbourne Airport's Air Quality Assessment means that Council's expert consultants were not able to undertake an assessment against the ERS or AQAC, however they consider that if an assessment was possible, the outcomes of the assessment may differ.

A more appropriate assessment would have been to meet the current GED to minimise risk to human health and the environment should have been undertaken and the ERS and AQAC should have been used to assess the outcomes of the air dispersion modelling.

While the MDP identifies a list of potential emission control measures, none of these measures have been modelled to assess their effectiveness in minimising emissions. The main sources of air pollution from airport operations are:

- Ground based operations at the airport including taxiing, take-offs and landings of aircraft, use of ground based vehicles, diesel generators etc.
- Overflight emissions
- Increases in road traffic surrounding the airport due to the airport operations.

Council's previous concerns regarding the internalised approach taken by Melbourne Airport is highly evident in its approach to off-site impacts around sources of air pollution from airport operations. The MDP does not consider overflight emissions or road traffic surrounding the airport. While it is accepted that overflight emissions usually have minimal impact at ground level therefore excluding them from the modelling is unlikely to significantly change the outcomes of the assessment, the same cannot be said for the anticipated increase in road traffic resulting from the proposed expansion of Melbourne Airport

A further shortcoming of the MDP is that no modelling has been conducted for near road impacts off-site that would be due to increases in traffic on roads external to the airport solely attributable to the airport expansion.

This lack of modelling means that there is no ability to accurately assess the potential impacts in Brimbank attributable to increased traffic directly related to the proposed airport expansion.

It is well documented that increased traffic and associated congestion are known to increase pollution levels. Although not quantified in the air quality assessment, the predicted increases in traffic would result in increased air pollution levels to the community proximate to Keilor Park Drive and Calder Highway. The MDP has not included traffic predictions in the air quality report for other roads within the Brimbank LGA, however an extract from the Tonkin & Taylor Report illustrates the substantial increase in traffic for some of the nearby roads, below:

*Table 4. Predicted Annual Increases in Traffic Keilor Park Drive and Calder Freeway west Keilor Park Drive No Build vs Build*

<b>Road Traffic Predictions</b>	<b>No Build</b>	<b>Build</b>	<b>Increase in Traffic due to Airport</b>
Keilor Park Drive 2026	6,741,317	7,183,860	442,543
Keilor Park Drive 2046	8,972,253	10,274,506	1,302,253
Calder Fwy 2026	24,992,195	25,427,788	435,593
Calder Fwy 2046	31,602,969	33,199,029	1,596,060

The predicted concentration of nuisance dust illustrated in the MDP extend beyond the airport boundary into Brimbank, close to the residential receptor on Overnewton Road. Monitoring should be implemented at this location during the construction of the 3<sup>rd</sup> runway to ensure that the impacts are being managed so as to confine impacts within the airport boundary and not on the Brimbank community. The decision by Melbourne Airport not to use the current EP Act and Guidelines to determine the significance of the impact on increases in pollution levels means that the conclusions drawn in the MDP report are unreliable.

The EP Act is designed to drive environmental improvements by ensuring that individual industries take responsibility for the risks they pose to human health and the environment.

Central to the Act is the 'General Environmental Duty' (GED). The GED requires all duty holders (businesses, industries, community etc.) to understand, abate and manage their emissions to minimise the risks of harm to the environment and human health. Complying with the GED requires both being proactive and employing industry best practices to minimise risk to human health and the environment, so far as reasonably practicable.

The GED requires anyone engaging in any activities that may give rise to risks of harm to human health or the environment from pollution or waste to minimise those risks, so far as reasonably practicable. This requires such risks to either be eliminated, or if it is not reasonably practicable to eliminate such risks, to be reduced so far as reasonably practicable.

Dr Denison describes, how this obligation translates:

*In determining whether it is reasonably practicable to minimise risks of harm to human health and the environment, the following matters are relevant:*

- *The likelihood of the risk eventuating.*
- *The degree of harm that would result if the risk eventuated.*
- *What the person knows, or ought reasonably to know about the harm or risks of harm and any ways of eliminating or reducing those risks.*
- *The availability and suitability of ways to eliminate or reduce the risk.*
- *The cost of eliminating or reducing the risk.*

*The GED requires the duty holder to reduce the risk of harm to human health and the environment from pollution and waste. Noise comes under the category of pollution, and it includes vibration. As far as reasonably practicable, if the duty holder's activity involves noise it's their duty to reduce the levels of risk. Businesses must not cause unreasonable noise or aggravated noise. They must make sure that any noise from their activities or premises doesn't unreasonably impact the local community.*

As also outlined, Melbourne Airport has a responsibility to comply with relevant Commonwealth legislation and have due regard to Victorian legislation, with a particular regard to Environment Protection Act 2017 as the proposed airport expansion will result in off-site amenity impacts. However, Melbourne Airport, through its Master Plan and more specifically the MDP have failed to apply the requirements of the EP Act and associated subordinate legislation as part of its assessments, despite this legislation being in force at the time that these reports were being prepared.

Dr Denison's findings identified:

*There is no discussion of the GED and how the emissions/operations are proposed to be managed to minimise the risk of harm to human health or the environment. The SEPP design criteria, which were revoked on 1 July 2021, have been used to assess compliance with air quality requirements in Victoria. This is not valid as the design criteria have had no legal standing in Victoria since 1 July 2021.*

The premise around the GED identified by Dr Denison in the Tonkin & Taylor report is consistent with long standing 'agent of change' principle (i.e. an agent introducing a new land use is responsible for managing the impacts flowing from that land use) regarding the obligations around the expansion of the airport's activities in particular amenity impacts, as detailed in the Master Plan and MDP. Consistent with the agent of change principle, there is a clear obligation on Melbourne Airport to explain how it is currently and, will in the future, ameliorate the adverse noise impacts resulting from its expansion.

### *Recommendation*

- Melbourne Airport commission an independent air quality assessment of the existing and proposed emissions from operation to be assessed against the EP Act and Guidelines detailing:
  - How the airport activities is currently and is proposed to be managed to minimise the risk of harm to human health or the environment of surrounding.
  - Its compliance with the the new EPA legislation and clear recommendations detailing how any noncompliance will be rectified.
  - How it will meet its GED to minimise risk to human health and the environment including appropriate modelling to assess their effectiveness in minimising emissions.

## 5.4 Compensation

Council engaged Marcus Lane Group (MLG) to investigate the potential for compensation for the Brimbank community adversely affected by both existing aircraft noise and future anticipated aircraft noise from the operations of Melbourne Airport. A copy of this advice is included at **Attachment 2**.

It is considered that compensation should be provided either by means of a noise amelioration program (NAP) or other forms of compensation to owners of dwellings and buildings accommodating sensitive land uses (i.e., schools, places of worship, childcare centres and hospitals) adversely affected by aircraft noise associated with Melbourne Airport.

The following excerpts of the MLG advice appropriately identify Council's position on this important matter:

*"Council submits there is sound policy rationale and need for compensation to those adversely affected by both existing aircraft noise and future anticipated aircraft noise from the operations of Melbourne Airport.*

*The purpose of such compensation is required to reduce the impact of adverse aircraft noise on the affected communities around Melbourne Airport by either*

*insulating dwellings and buildings accommodating sensitive uses or by other forms of compensation, as necessary. "*

The rationale and need for compensation are based on:

- Aircraft noise exposure is recognised as a health risk.
- The health effects impact people of all ages, in particular the older (> 65 years of age) and younger (1-14 years of age) members of the community and can also negative economic effects, as they impact the productivity of workers and cause a burden on health care systems.

As a result of the construction of the third runway, some dwellings and buildings accommodating sensitive uses will experience an increase in noise exposure (while others may decrease). As identified previously, the operations of the airport including those proposed under the Master Plan and MDP provide considerable benefits to the Victorian economy. Nevertheless, Council submits that it is inherently unfair that the Brimbank community must endure the significant disbenefits and recognised health risks from the excessive and prolonged exposure to adverse aircraft noise because of living and working in buildings accommodating sensitive uses close to airports or under flight paths.

Additionally, the community or 'receivers' of adverse aircraft noise living under air corridors have to not only endure the aircraft noise (and its health ramifications) but the costs, including the loss of property value and any mitigation measures (to the extent they can afford them and have undertaken remedial insulation measures).

Council questions why Brimbank and the communities proximate to Melbourne Airport are being treated differently and why such a noise mitigation scheme, has not been contemplated by Melbourne Airport, particularly as there are examples of past schemes for both Sydney Airport and Adelaide airports in addition to several overseas examples including Heathrow and Frankfurt.?

Council contends that the well-established 'agent of change principle', encapsulating the position an agent introducing a new land use is responsible for managing the impacts flowing from that land use (including adverse aircraft noise), should be invoked. Consistent with the agent of change principle, there is a clear obligation on Melbourne Airport to ameliorate the adverse noise impacts resulting from the proposed third runway.

Moreover, Council deems that Melbourne Airport has an obligation to consider impacts beyond the boundaries of the airport and where those impacts, either existing or anticipated, are unreasonable, and ameliorate those impacts or, if the impacts cannot be satisfactorily ameliorated, then compensated.

Past NAP's have used the following metrics as a basis for the level of noise attenuation to be achieved:

- 50dB(A) in bedrooms; and
- 60dB (A) in other living areas of a dwelling excluding bathrooms and laundries.

Council submits that these metrics are based on research from the late 1990's and require an evidence-based approach to their update and review. More recently, WHO has undertaken research recommending noise reduction targets of 40dB(A) in bedrooms and 45dB(A) in other habitable living areas of a dwelling, while clause

58.04.3 has been introduced into the Victorian Planning Provisions (VPP's) applying internal noise targets to apartment buildings of five (5) or more storeys.

The following excerpts of the MLG advice outlines Council's position on this matter:

- "6.18 *Council submits great weight should be placed on the WHO targets. This is for reason the WHO literature comprises the most recent and authoritative opinion considering aircraft noise and its impacts on health, wellbeing and quality of life. This is well documented in the NHRA prepared by Tonkin + Taylor on Council's behalf.*
- 6.19 *Council does not advocate for a particular noise target, although it submits the WHO target should be the starting position. Rather Council advocates for an outcome ensuring aircraft noise does not adversely impact sensitive receiver's health, wellbeing and quality of life. These considerations are paramount.*
- 6.20 *In achieving these paramount outcomes, Council submits further work informed by expert evidence must be undertaken to determine the criteria used in setting such targets with a view to ensuing aircraft noise does not adversely impact sensitive receiver's health, wellbeing and quality of life. To-date no such analysis has been commissioned by either the Department or Melbourne Airport.*
- 6.21 *This must be done. The outcomes of such evidence-based review should inform the extent of noise attenuation measures required"*

Council submits that there are a wide range of dwelling and sensitive use types that should be eligible for either an NAP or compensation, including:

- Dwellings within the 2022 ANEF 30 to 35 contour
- Buildings accommodating sensitive land uses within the 2022 ANEF 25 contour
- Dwellings and buildings accommodating sensitive land uses constructed in accordance with the requirements of the Brimbank Planning Scheme (Scheme) and Building Act and Regulations at that time, but now proposed for inclusion in the Melbourne Airport Environs Overlay (MAEO) as a result of the 2022 ANEF contours
- Dwellings and buildings accommodating sensitive land uses constructed in accordance with the requirements of the MAEO (i.e. to meet the Australian Standard) proposed to be removed from the MAEO as a result of the third runway.
- Existing dwellings and buildings accommodating sensitive land uses constructed before the Melbourne Airport construction project was announced in 1959.
- Dwellings and buildings accommodating sensitive land uses constructed after 1959 but before the former Airport Environs Overlay was introduced on an interim basis through planning scheme amendment L45 to the former Keilor Planning Scheme in May 1992.
- Existing dwellings and buildings accommodating sensitive land uses identified within the 2022 ANEF contours (and not the 2018 ANEF contours).

### *Recommendation*

- An adequate compensation scheme including a NAP under the existing legislative framework is prepared
- The form of compensation must be effective and informed by an evidence-based approach.
- An adequate opportunity is provided to the owners of dwellings and buildings accommodating sensitive uses for the review of the compensation scheme and comment
- An adequate opportunity is provided to the general public to review the compensation scheme and comment

## 5.5 Human Rights

Council engaged Marcus Lane Group (MLG) to review the impacts of the Master Plan and MDP on the human rights of its community and Victorians in general. A copy of the advice is included as **Attachment 3**.

Council submits:

- Humans have a right to enjoy a safe, clean, healthy and sustainable environment
- Such environmental rights are necessary for effective human rights protection
- The human rights of those persons (including children) who are subject to unreasonable interference occasioned by aircraft noise should be considered by the Commonwealth and their health and well-being should be ensured and integrated into decision making when determining whether to approve the Master Plan and the MDP and any conditions, which ought to apply.

Council further submits that human rights are a relevant consideration in the determination (including conditionally) of the Master Plan and MDP.

Council recognises the Charter does not apply to the Commonwealth when making an administrative decision (as in this case). Notwithstanding, as Australia is a party to seven core international human rights treaties and of these, a number of human rights embodied and protected in those treaties are triggered in this context; Council urges the Commonwealth to assess the environmental impacts and consider its human rights obligations when considering aircraft noise as part of proposed third runway.

This approach is consistent with determinations of the European Commission and the European Court of Human Rights, where the right to environmental protection is an established link to several basic human rights.

The Master Plan and MDP make clear the 'benefits and impacts of the proposal are assessed in terms of changes in noise exposure at these locations, and in terms of the number of receivers experiencing a given level of noise exposure'.

Council submits the noise and health impact assessment is seriously deficient in the Master Plan and MDP as they do not assess the actual impacts or likely noise exposure to be experienced by the community. Nor do they assess whether the impact of aircraft noise on affected community is reasonable or whether a judgment is required identifying the impacts.

Additional, to the fact there is insufficient information in the documents to assess the likely noise and its impact, rendering the proposal not supportable, there is no analysis or evidence supporting the assertions and conclusions advanced by Melbourne Airport.

Council submits that the lack of rigour and independence adopted is a fundamental defect in the documentation and warrants clear independent and expert evidence of the conclusions advanced by Melbourne Airport is presented, with opportunity provided to the community for review and comment.

The following excerpt from Attachment 3 appropriately outlines Council's position on this important matter:

48. *Council also urges the decision maker to consider more broadly the relationship between aviation noise and people's health and well-being. Council submits such relationship should be better understood and better integrated into decision-making.*
49. *The measures to safeguard and maintain, protect and support Melbourne Airport's ongoing operations must be balanced with the needs of affected communities surrounding the airport.*
50. *The rights of the airport and its operations are not absolute.*
51. *They do not trump the human rights of noise sensitive receivers where adverse impacts are experienced.*
52. *Council submits the requirements of environmental protection and human rights are now in the interests both of the individual and of the national community as a whole, and the decision maker take them into account in determining whether to approve or in what manner the draft Master Plan 2022 and draft MDP.*

### *Recommendation*

- Further work is required to determine the relation between aviation noise and people's health and well-being, and to ensure the needs of affected community and their human rights are not compromised by the Master Plan and MDP.
- clear independent, expert evidence of the conclusions advanced by Melbourne Airport is presented in relation how Human Rights are proposed to be protected
- Adequate details are provided in relation to these conclusions outlining how Human Rights are proposed to be protected.
- Provide further opportunity for the general public to review and comment on the expert evidence and the conclusions outlining how Human Rights are proposed to be protected.

## 5.6 Public Safety Areas

The Master Plan has updated the location of the Public Safety Areas (PSA) to reflect the new location of the proposed third runway in the north/south orientation.

PSA's are designated areas of land at the end of airport runways where planning restrictions may apply.

The Master Plan explains, at Page 311:

*While air crashes are rare events, the majority occur in the vicinity of airports during take-off and landing. Development within these areas may be restricted to control the number of people on the ground at risk of injury or death in the event of an aircraft accident*

The PSA comprises of two areas, the 1:10,000 inner area where the risk of being killed by an aircraft is one in 10,000 per year and an outer area, where the risk decreases to one in 100,000 per year.

The incompatible uses within nominated PSA's for both the inner and outer PSA include dwelling houses, multiple dwellings, tourist parks, hostels, residential care facilities and retirement villages.

The outer PSA for the proposed third runway would extend south of the runway into 1.2 kilometres of the existing residential area of Keilor Village, at a width of 20 – 40 metres. This means that up to 60 existing dwellings and the Keilor Community Hub are now directly impacted by the outer PSA.

The implementation of NASF guidelines, as recommended in the recently released Report by the Melbourne Airport Environs Area Safeguarding Standing Advisory Committee (MAESSAC), would see the PSA's identified as an Overlay in Victorian Planning Schemes. If the MAESSAC recommendation is adopted that would mean that any vendor statement given to buyer regarding the sale of land (commonly referred to a Section 32 under the Sale of Land Act) must disclose the Planning Overlay identifying the property being sold being within the PSA.

It is evident that the nomination of any site within a PSA, where dwellings are identified as 'incompatible uses', would impact the property values of these sites.

### *Recommendation*

- Melbourne Airport accurately identify all properties within the PSA
- Adequately communicate with all owners of properties within the PSA and allow an adequate opportunity for their review and comment
- The accurate identification of all properties within the PSA are made publicly available and allow an adequate opportunity for their review and comment.
- A purchase scheme is implemented where properties within the PSA can be voluntarily offered by owners, at current market value, for purchase by Melbourne Airport/the Commonwealth
- An appropriate opportunity be provided for all owners with the PSA and the public to review and comment of the impacts of the PSA purchase scheme, prior to its implementation.

## 5.7 Access

Council is concerned that Melbourne Airport's appears to be satisfied that the future (short and long-term) development of the airport, continues to rely on private vehicles and or taxi/rideshare facilitating most trips to and from the airport.

While there is some discussion in the Master Plan around passenger and employment forecasts, there does not appear to be any discussion relating to future mode splits (i.e., how are these different groups anticipated to access the airport in the future), or any aspirations/targets.

Council's declaration of a Climate Emergency and corresponding Brimbank Climate Emergency Plan calls for a much greater use of active and public transport modes to meet its municipal target of zero net emissions by 2040. As a significant employer of Brimbank residents, improved bus and cycling connections to and from the airport and its surrounds would achieve greater sustainable outcomes.

Regarding future transport modelling, the Victorian Integrated Transport Model (VITM) has assumed that the Outer Metropolitan Ring Road will be operational by 2046. However, it will not be delivered in a staged process, which would facilitate some initial road access to be delivered along the corridor, prior to a fully constructed freeway being delivered (as has been modelled for the Bulla Bypass and Melbourne Airport Link (MAL) projects.

Council is concerned that the VITM model for the 2031 reference model does not include Melbourne Airport Rail (MAR), noting it is due to be completed by 2029. The absence of MAR in the 2031 model is likely to show a greater proportion of vehicle trips to the airport than might occur.

The modelling also does not incorporate the Suburban Rail Loop (SRL) project and appears to be a missed opportunity to fast-track SRL access to the airport.

Council supports Melbourne Airport's approach to public transport connectivity through the identification of potential new public transport routes connecting the airport to Sunshine, St Albans and Watergardens. While the connections are only identified as schematic, this would present opportunities to improve public transport access to areas of Keilor, Keilor Park, Kealba and other suburbs in Brimbank's north, which are overly reliant on private vehicles to access daily needs.

Council is concerned that the timeframes proposed in the Master Plan to deliver these routes are too long (around 6-20yrs) and considers these should be prioritised and reflected as short-term initiatives, with delivery commencing in five years.

In relation to express bus services (SkyBus), Council believe that it would be beneficial if a new direct bus connection were to be provided between Sunshine Railway Station and the airport to help generate public transport demand before Melbourne Airport Rail is completed.

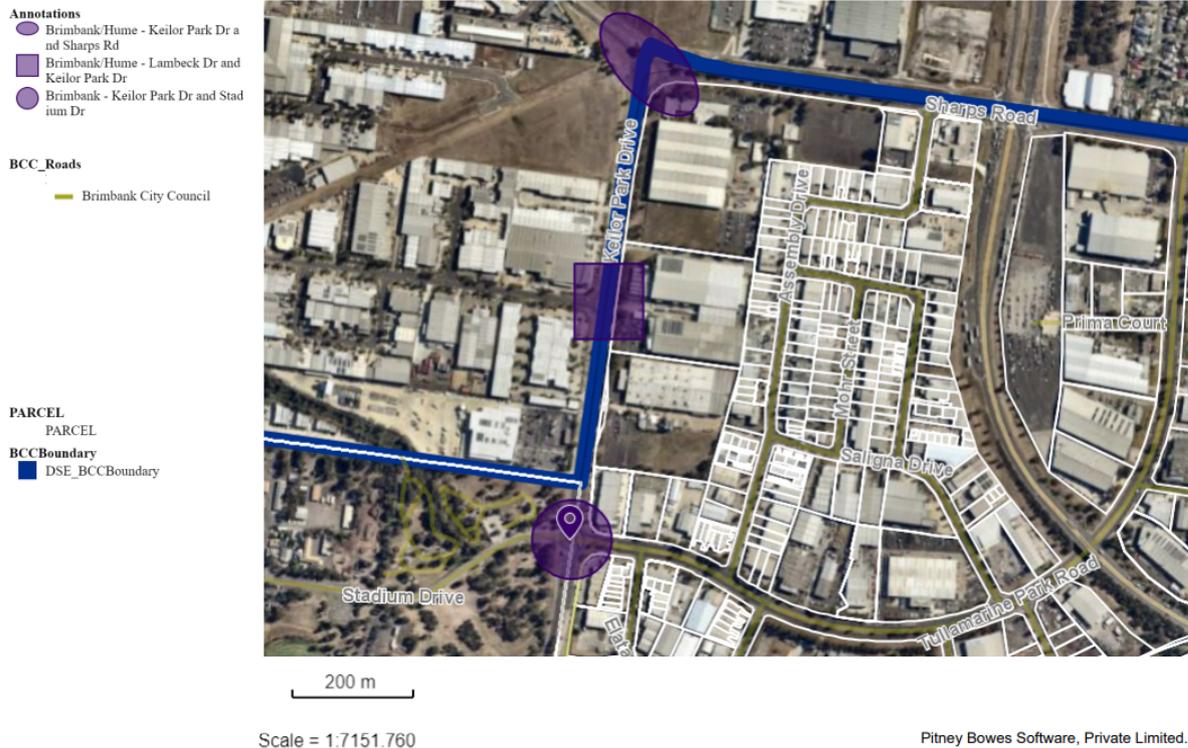
Council notes the anticipated increase in truck movements outlined in the Master Plan and considers this increase should be limited to the internal road network of Melbourne Airport and the arterial road network. Council is concerned that the local road network, inclusive of Arundel Road in Brimbank, has not been designed for such movements and would require substantial remediation and ongoing maintenance throughout the construction period.

The Masterplan identifies that traffic is expected to increase by 11% within five years following the construction of the third runway, and substantially increasing to 40% by 2046. This forecast increase in congestion is significant and requires DoT and/or Melbourne Airport to prioritise the upgrade of the roundabouts at the Keilor Park Drive, Sharps Road and Tullamarine Park Road (refer image below), in addition to facilitating construction vehicle access between the proposed southern site access point of the airport, which includes Operations Road and McNabb Road and linking to the Calder Fwy / M80 Ring Road.

Table 5. Roundabouts affected by the Third Runway

23-Mar-2022

Roundabouts affected by 3rd Runway MA



If the Master Plan and MDP are approved, a 'Construction Traffic Management Plan' will be required and implemented by Melbourne Airport in conjunction with DoT. As outlined previously no truck movements should be permitted on Arundel Road, and all construction vehicles should be required to utilise the southern access of the airport via Operations Road.

### Recommendation

Council submits that the approval of any Master plan and MDP be deferred until the following is included in the documents and an appropriate opportunity be provided for public review and comment:

- An adequate assessment is undertaken of the impact that Melbourne Airport Rail will have on the future road access to the Airport in relation to potential reduction on reliance of vehicle access.
- Emphasis on the importance of increased bus services connecting the airport locally and regionally.
- Melbourne Airport explicitly advocate for a more balanced transport mode split regarding access to and from the airport.
- Traffic modelling be refined to more accurately reflect the anticipated future transport network serving Melbourne Airport, including Melbourne Airport Rail being in operation in the 2031 scenario.
- Advocacy for the Airport Rail Link along the Albion East corridor and the benefits from the stop in Sunshine.

- Further consideration be given to the Outer Metropolitan Ring Road (OMR) being delivered in a stages with some level of connectivity along the OMR corridor being modelled for in the 2031 scenario.
- A commitment from Melbourne Airport to work with Brimbank and surrounding councils to manage the impacts of the Airport, including any construction processes, on local roads.
- A more detailed assessment on the delivery of improved cycling connections is required (including along Arundel Road), with a focus on reducing car and bus transport to and from the airport.
- A commitment from Melbourne Airport to undertake preliminary planning with Council and the Department of Transport (DoT) regarding the western access and connection to Kings Road and the Calder Freeway and include identifying and protecting the future road reservation through a Public Acquisition Overlay, an alignment that avoids Keilor Golf Course, and retains native vegetation and habitat connectivity.
- The Master Plan be amended to improve the functioning of the Calder Freeway, including a full diamond interchange at Calder Park Drive, widening and strengthening of the Maribyrnong River Bridge and additional lanes /emergency lanes between Keilor Park Drive and Melton Highway prior to any additional traffic volumes being accommodated at the Kings Road interchange.
- The Master Plan must include greater detail regarding the operation and ticket pricing for Melbourne Airport Rail, including possible implications these issues may have on the demand for future rail travel to and from the airport by passengers and employees.
- A commitment from Melbourne Airport to bring forward the timeframes to 0-5yrs, for proposed local bus routes to Sunshine, St Albans and Watergardens
- Include the provision of a dedicated express service (i.e. SkyBus) from Sunshine Railway Station to the airport in advance of delivering the Melbourne Airport Rail project.
- A commitment from Melbourne Airport that trucks will be prohibited from accessing McNabb and Arundel Roads during any construction period, as these roads are not constructed to carry heavy loaded truck movements, while the Arundel Road Bridge over the Maribyrnong River is not suitable for fully loaded truck movements.

## 5.8 Environment

Brimbank acknowledges that notable progress to improve the environmental performance of the airport over recent years, however the general environmental management approach is not aligned to the stated policy intent for the airport *'to be an environmental leader for transport and logistics sites in Australia'*.

Indeed, the environmental ambition over the next twenty years is almost absent from the Master Plan, as there is no expression of a more meaningful vision related to the above policy intent, and few proactive steps to become an exemplar sustainable airport.

The Master Plan misses the opportunity to emphasise that Melbourne Airport is the second most utilised gateway to Australia and more specifically, a gateway to one of the most liveable cities on Earth. Likewise, Melbourne Airport appears to be missing a vital opportunity to advance its reputation as a truly leading international airport in terms of sustainability, caring for Country, and climate change resilient biophilic design.

It is considered that a greater focus on sustainability and biodiversity conservation is required as part of design, construction and operation of Melbourne Airport and the third runway. The Master Plan ambitions are only to *endeavour to ameliorate* some of the airport's negative impacts on the surrounding people and environment, and it is considered this should be revised so that Melbourne Airport makes a net positive contribution in recognition of the environmental burden it imposes beyond its site boundaries.

Melbourne Airport also misses the opportunity to be a positive environmental leader in Melbourne in the context of a rapid transition away from fossil fuels. The work to construct the third runway and other associated development should consider how it can avoid and minimise adverse impacts and optimise positive benefits, through the provision of specific detail around short and medium-term targets in accordance with Victoria's net-zero by 2050 legislated climate target, and other strategic documents, such as the integrated water management plans for the Maribyrnong and Yarra catchments.

An obvious limitation in the Melbourne Airport Master Plan and MDP, including the Environmental Management Plan, is that it is too internally focussed, and any future work must acknowledge and respond to its surroundings, i.e. people, place and context.

Biophilic design is changing airports from Singapore to Mexico to Western Sydney, demonstrating that airports of the future will no longer simply be places of transit but destinations in themselves.

With respect to biodiversity and conservation management, the Master Plan fails to identify the role Melbourne Airport plays in providing protection for areas of environmental, landscape and scenic values. Moreover, it does not provide any meaningful consideration of the extent and/or appropriateness of the Melbourne Airport development boundary along Deep Creek and the Maribyrnong River, which includes steep escarpments and waterways that support habitat for the Growling Grass Frog, Australia Grayling, other fauna species and cultural heritage values. The ongoing management of these escarpments and waterways is specialised requiring significant investment to manage and rehabilitate.

As Council owns and actively manages land that directly adjoins Melbourne Airport's western boundary (Deep Creek/Maribyrnong River), Council encourages a greater partnership with the Airport and other surrounding landholders with regards to land management around pest and animal control programs.

Additionally, the Master Plan identifies opportunities to provide a road connection via the Kings Road Interchange located off the Calder Freeway, Keilor North. Further work is required to assess the environmental impacts of this proposal including on Council land and the Maribyrnong River and the Green Wedge.

Another environmental concern with the Master Plan is that it has not considered the treatment of Deep Creek, even though stormwater discharge and associated

pollutants are expected to increase as the airport footprint expands toward Deep Creek as a receiving waterbody.

Melbourne Airport also accepts that water quality discharging from the airport does not currently meet all Airport Regulations and Environmental Reference Standard (Vic) quality objectives. The MDP states that this is not an uncommon issue as many quality objectives are also not met in the broader catchment areas. The MDP however, presents an opportunity to improve surface water discharge quality, particularly from Arundel Creek which is the main discharge point for the airport. Given that the project is removing most of the Arundel Creek, it seems reasonable that the airport should be seeking to make significant improvements to water quality rather than just being satisfied with either non-compliance of regulations or minimum compliance.

Council submits that prior to any approval of the Master Plan and MDP that the targets and actions for land, surface water groundwater and storm water management in the Master plan be independently reviewed. Targets should include reference to standard water quality targets leaving the site, all flows should be appropriately treated, with the aim of all actions proposed being to improve water quality through incorporating water-sensitive urban design, to all waterways. Additionally, stormwater treatment systems should be incorporated that aim to mimic natural water flow patterns of the region.

Council has significant concerns with the impact of the project on the 78.74 ha of Grey Box Woodland (intact woodland and derived grassland), 97.89 ha of Natural Temperate Grassland of the Victorian Volcanic Plain, 9.75 ha of Golden Sun Moth habitat, 64.34 ha of Growling Grass Frog habitat and 68.02 ha of Swift Parrot habitat.

The MDP will result in a significant impact to the environment on Commonwealth land, due to:

- Large-scale clearing of native vegetation
- The removal of threatened ecological communities and species habitat
- Loss of habitat for local wildlife populations
- Substantial alteration to landscape features through removal of the majority of Arundel Creek and approximately half the Grey Box Woodland.

This is a substantial impact proximate to the conservation values including those in the adjacent Organ Pipes National Park and Council's Sydenham Park.

While noting that mitigation measures are intended to be implemented through the proposed 'Construction Environmental Management Plan', which seek to reduce impacts where possible. The limited detail outlining the efforts made to avoid and minimise such impacts, should be more clearly described before progressing to the consideration of relevant offsets.

As Melbourne Airport supports one of three largest representations of Grey Box Grassy Woodland in southern Victoria, it is essential that prior to the approval of the Master Plan or MDP, further considerations in the design and construction of this project be undertaken to reduce the impact to this Threatened Ecological Community (TEC). Where the TEC is impacted clear evidence of the efforts undertaken to minimise impacts on this TEC should be provided and explained simply within the documents.

Melbourne Airport's documentation identifies that if appropriate management or mitigation controls are not implemented, the presence of contamination in soils, sediments and groundwater and that the generation of wastes have the potential to impact the environment as part of the construction and operation of the third runway. Council is supportive of the principles proposed to manage contamination, however specific management measures of the poly-fluoroalkyl substances (PFAS) are yet to be confirmed and it is unclear if the target to treat 100% of PFAS impacted wastewater includes impacted surface water discharge. Council recommends that the draft PFAS strategy is given to the relevant PCG and relevant stakeholders for comment, prior to any approval.

Council is disappointed with Melbourne Airport's lack of ambition to achieve improved status under the 'Airport Carbon Accreditation Scheme of Airports Council International' and deal with greenhouse gas emissions with a greater commitment. Melbourne Airport has achieved Level 2 status under this accreditation scheme and is low compared to Christchurch Airport, which has a considerably higher status (Level 4 Transformation status).

Council considers that this lack of ambition regarding greenhouse gas emissions is indicative of the internalised approach of Melbourne Airport, with little regard to its neighbours. Melbourne Airport should show its commitment to reducing greenhouse gas emissions by committing to the following in the Master Plan and MDP:

- Immediately switching to 100% renewable electricity including for landside operations,
- Conduct a climate change impact assessment to model the impact of the project on emissions (i.e., to calculate the indirect emissions induced through the expansionary effects of the MDP in aggregate)
- Commit to Level 4 Transformation status or above within a set timeframe.

Finally, Council notes that a Construction Environmental Management Plan (CEMP) will be developed following final design approval. Council has concerns around the environmental management of the construction project and want an opportunity to review the CEMP, and for it to be made available for public review and comment, prior to its approval.

### *Recommendation*

Council submits that the approval of any Master plan and MDP be deferred until the following is included in the documents and an adequate opportunity is provided for public review and comment:

- Further detailed initiatives to minimise and reduce greenhouse gas emissions are undertaken, including but not limited to:
  - switching to 100% renewable electricity including for landside operations,
  - Engaging an independent expert to conduct a climate change impact assessment to model the impact of the project on emissions
  - Melbourne Airport publicly commit to achieving a Level 4 Transformation or above within a set timeframe.
- A commitment from Melbourne Airport to deliver sustainable transport connections including rail, bus and cycling within 0-5 years and detailing how this will be achieved.

- A commitment from Melbourne Airport to develop a coordinated integrated water management plan to reduce storm water flows into waterways, improve water quality and peak flow levels
- A commitment from Melbourne Airport to review and adjust water quality targets to provide opportunities for improvement of water quality.
- A commitment from Melbourne Airport to incorporate stormwater treatment systems that aim to mimic natural water flow patterns of the region.
- A public commitment from Melbourne Airport for regular communications and updates from Melbourne Airport's Environment and Sustainability Team to the CACG and Planning Coordination Forum (PDF).
- A public commitment from Melbourne Airport to recognise and detail the importance of proactive and coordinated land management efforts across boundaries, including pest plant and animals control programs
- Melbourne Airport engage an independent expert to determine the significant environmental management requirements and mitigate all potential impacts on landscape and scenic values with the Deep Creek and Maribyrnong River boundary.
- Melbourne Airport engage an independent expert to determine the impact of odour (fumes) on surrounding communities, including the involvement of government agencies and detail clear mitigation measures to provide reassurance to the community regarding their safety
- Clearly detail the environmental impacts associated with the proposed western connection to the Airport, and undertake early engagement with Council
- Melbourne Airport engage an independent expert to review the Targets and Actions for Biodiversity and Conservation in the Environment Strategy, focusing on conservation values, with regards to pest plant and animal control across the site, inclusive of all waterways and conservation/recreation areas.
- A public commitment from Melbourne Airport to elevate its aspiration to be a model environmental leader in the rapid transition away from fossil fuels, having specific reference to short and medium-term targets and KPI's that are publicly available and consistent with Victoria's net-zero by 2050 legislated climate target, and other strategic documents such as the integrated water management plans for the Maribyrnong and Yarra catchments in this Master Plan.
- Melbourne Airport publicly and explicitly acknowledge its stewardship responsibilities and the impact of land management of airport land on surrounding landholders, and a commitment to coordinate conservation land management activities with surrounding land managers
- Melbourne Airport engage an independent expert to review the Targets and Actions for Land, surface water and groundwater management in the Environment Strategy to ensure improved outcomes for the environment will result.

- Clearly identify key vectors of weed invasion, and detail how these risks will be mitigated and managed, including during the earthworks, and standards for imported fill.
- Clearly identify and detail the impacts of habitat disturbance, lighting and noise on fauna, and the specific mitigation(s).
- Melbourne Airport engage an independent expert to review, clearly identify and detail the impacts and management strategies on the existing fauna, listed threatened species and ecological communities.

## 5.9 Economic Development

As Australia's second busiest passenger airport and largest air freight terminal, it is acknowledged that Melbourne Airport is a significant contributor to the Brimbank economy.

The Master Plan outlines that the expansion of the airport including the precinct and is estimated to generate:

- 76.6 million passengers by 2042
- Support 19,000 airport precinct jobs, growing to 29,000 by 2042
- 71,000 Victorian tourism jobs
- 72.9 million international visitors
- \$12.5 billion in tourism outputs
- \$18.2 billion in international freight
- \$5.7 billion in exports and \$12.5 billion in imports
- \$22 billion to the national economy
- \$20 billion to Victoria's economy

The economic impact analysis provided in the Master Plan stated that by 2046 an additional 37,000 jobs would be in place that would not exist if the 3rd runway were not constructed, with most of these new jobs expected to be in the transport, postal and warehousing industries and the accommodation and food services industries.

It is also noted that according to the latest 2016 ABS 1,369 Brimbank residents work in the Melbourne Airport Precinct, including 380 Brimbank residents directly employed at Melbourne Airport by the APAM.

These 1369 Brimbank residing airport workers are estimated to be making a significant contribution to the overall Brimbank economy each year, including \$93.40m in direct output, and an additional \$52.02m direct value add, which supports a further 720 local jobs.

When the indirect amounts are added, including \$97.63m indirect output and \$40.74m indirect value, and 294 indirect local jobs, it results in a total annual Economic Output of \$191m, with \$90.76m in 'Value added' and 1014 Jobs.

The passenger and freight capacity of the Master Plan, combined with the potential benefits of the Melbourne Airport link will generate a significant incremental increase on the economic activity in Brimbank.

Notwithstanding, the Airport more positively impact the Brimbank economy by:

- Committing to procurement policies and practices that prioritise local services within neighbouring municipalities affected by the airport noise and planning restrictions.

- Partnering with Brimbank Council's Local Jobs and Local People program, around jobs training and career pathways available at Melbourne Airport, and participate in local job fairs, an employment accord, and promoting job vacancies on the Brimbank Joblink website.

Strengthening links with the Sunshine National Employment and Innovation Cluster and the Sunshine Health, Wellbeing and Education Precinct

- Partnering with Western Melbourne Tourism to develop tourism development networks in Sunshine and Melbourne's west.
- Promoting visitation to Brimbank at the Airport, including its heritage e.g. commemorating the role of Sunshine and HV McKay in the creation of the Royal Flying Doctors Service through a mural at the Airport.

It is also evident that other aspects of the Master Plan are likely to counteract the economic gains to the Brimbank economy, because of potential conflicts and externalities, for example:

- The Airport's operational impacts, e.g., Off site amenity issues such as noise and the PSA, which can impact property values
- More competition in sectors where the airport is a direct competitor, e.g., commercial land development and accommodation
- The expanded operation of the airport will restrict the development potential of some land in Brimbank, where some land either cannot be developed, or limitations are placed on the height and density of developments and restrictions placed on the subdivision of existing residential properties.

### *Recommendation*

- Detail how the Master Plan and MDP will mitigate any negative economic impacts from the airports existing and future operations e.g. amenity impacts that can reduce property values and restrictions on development.
- Detail explicitly how Melbourne Airport will partner with Council to develop local employment, service delivery and procurement policies and practices with a positive prejudice toward business services in neighbouring municipalities
- Detail explicitly how Melbourne Airport will partner with Council to introduce employment programs and/or work collaboratively with Council's 'Local Jobs for Local People Program' to deliver actual jobs to local people, increasing employment opportunities through apprenticeships, training, employment pathways, etc. for our community at Melbourne Airport and in related industries and operations.
- The employment program introduced must have a clear measure regarding the number of people employed at Melbourne Airport and in related industries and operations and the LGA where they reside, with this information shared bi-annually with Council and neighbouring LGA's
- Melbourne Airport publicly commit to promote employment opportunities at the airport with consideration around initiatives including local Jobs Fairs, Brimbank Joblink and an Employment Accord.

- Detail explicitly how Melbourne Airport will work with local educators to promote jobs training and career pathways at the Airport
- Detail explicitly how Melbourne Airport will strengthen links with the Sunshine National Employment and Innovation Cluster, including the Sunshine Metropolitan Activity Centre and the Sunshine Health, Wellbeing and Education Precinct focused around the Sunshine Hospital.
- Detail how Melbourne Airport will promote future technology changes, including automated vehicles and the impact on future land use and development, and advanced aircraft technology, including electronic engines and other advancements that will promote production of quieter aircrafts.
- Detail explicitly how Melbourne Airport will deliver opportunities at the Airport and through its network to promote tourism assets in Brimbank and Melbourne's west.
- Detail clearly how Melbourne Airport will commemorate the role of Sunshine and HV McKay in the creation of the Royal Flying Doctors Service with a mural at the Airport
- Detail explicitly how Melbourne Airport will partner with Council to develop stronger working partnerships with regional industry bodies.

## 5.10 Statutory Planning

Council recognises the State Government's role in ensuring that the appropriate statutory controls are incorporated into planning schemes.

### 5.10.1 *Melbourne Airport Environs Overlay*

The changes to the to the Australian Noise Environment Forecast (ANEF) contours impact on a larger area of Brimbank including North Sunshine and should be reflected in the Melbourne Airport Environs Overlay (MAEO) to ensure the appropriate consideration of planning permit approvals with regard to use, density and noise attenuation.

The expedited update and application of the MAEO is important, and the Airport can play a stronger role in advocating with councils to the State Government for a Ministerial planning scheme amendment to facilitate its introduction.

### 5.10.2 *Obstacle Limitation Surface*

The Obstacle Limitation Surfaces (OLS) are a series of surfaces that set the height limits of objects around an aerodrome. Objects that project through the OLS become obstacles.

The assessment of planning permits and the appropriate regard to OLS would be assisted by the development of an overlay to ensure the appropriate consideration.

### 5.10.3 *Green Wedge Zone*

Council's strategic planning work program identifies the future review of the Brimbank Green Wedge Management Plan, which impacts the agricultural land located along the Maribyrnong River to the north of the municipality which is located outside the Urban Growth Boundary.

Council has received several inquiries from landowners regarding the lack of development potential of land located in the Brimbank Green Wedge Zone. Council will seek to engage Melbourne Airport in the future review of the Zone.

*Recommendation*

- Melbourne Airport, publicly commit to partnering with Brimbank and all impacted Councils, to advocate to the State Government for the expedited update of the Melbourne Airport Environs Overlay to reflect the 2022 ANEF.
- Melbourne Airport, accurately identify properties that require safeguarding and develop a voluntary acquisition scheme for those impacted properties.
- An adequate opportunity is provided to the owners of those impacted properties to review the voluntary acquisition scheme and comment.
- An adequate opportunity is provided to the general public to review the voluntary acquisition scheme and comment.
- Melbourne Airport, in partnership with impacted Councils, advocate to the State Government for the development of an Overlay for the Obstacle Limitation Surface (OLS)
- Melbourne Airport actively engage with Council about the future review of the Green Wedge Management Plan.

## 6. Conclusion

Council's analysis of the Master Plan and Major Development Plan, including the findings of experts engaged to analyse key components, identified that many of the metrics used to support the Master Plan and MDP are either not informed by an evidence-based approach, do not use world's best practice, rely on outdated information and legislation, ignore Melbourne Airport's context and fail to adequately consider the health and wellbeing of Brimbank's residents and workers and those in neighbouring LGAs.

The most significant shortcomings of the Master Plan and MDP are:

- The failure to recognise the health impacts to existing residents in Brimbank and neighbouring municipalities from the current airport operations.
- The significant underestimation of the health impacts from increased aircraft noise on the Brimbank and surrounding community's wellbeing.
- The failure to consider any meaningful ways to reduce and mitigate the off-site impacts of the present and future operations of Melbourne Airport.

Council concludes that it does not support the Master Plan and MDP, and this is principally due to the health impacts identified in HRA which represent an unreasonable, unacceptable and inherently unfair risk to the Brimbank community, as well as the range of other significant impacts outlined in this submission

Melbourne Airport is an important neighbour to Brimbank, and Council wants to build on its existing relationship with Melbourne Airport in any future development of the Master Plan and MDP, especially given as the significance of its impacts on Brimbank.

Council is seeking that the Federal Government progress a range of changes to minimise the harm to human health from aircraft noise, and improve airport planning and community consultation, including but not limited to:

- Undertaking a review of the aircraft noise system to minimise harm to human health and provide health impact guidance to protect community from aircraft noise. This should include the establishment of appropriate noise metrics that accord with health guidance established by World Health Organisation Environmental Noise Guidance 2018 (WHO Noise Guidance), and best practice noise prevention and amelioration measures to address noise exceedances, including the establishment of a noise insulation program and compensation scheme.
- Requiring airports prepare Health Impacts Assessments (HIA), as part of the Master Plan and MDP, that are assessed against WHO Noise Guidance
- Require that the HIA undergoes an independent and expert peer review to ensure its veracity, and that the HIA and peer review are made available for public review.
- Entering into a bilateral agreement with the State Government in relation to any further development of the 2022 Draft Melbourne Airport Master Plan (or other Master Plan) and or the Major Development Plan for the Third Runway, specifically including:
  - Appointing a community forum, similar to the composition of that established for Brisbane Airport, or alternatively, appointing an Advisory Committee under section 151 of the Planning and Environment Act 1987, to provide a transparent, independent and public review process that enables impacted stakeholders to present their submissions for independent consideration.

- Requiring an Environment Effects Statement under the Environment Effects Act 1978, including:
  - A Health Impact Assessment for off-site impacts, specifically including the assessment of noise impacts against the World Health Organisation Environmental Noise Guidance 2018, and relevant state legislation like the Environment Protection Act 2017
  - Prevention and amelioration measures to adequately address noise exceedances, including options for a federally funded noise insulation program, a noise curfew, voluntary property acquisition or other measures.
- Requiring a Comprehensive Impact Statement process under the Major Transport Projects (Facilitation) Act 2009.
- Requiring that Melbourne Airport meet Victorian legislation, guidelines and standards in relation to the offsite impacts from the existing and any expanded operations of Melbourne Airport.



1 June 2022

Hon Catherine King MP  
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Dear Minister

**Brimbank Council Submission to 2022 Draft Melbourne Airport Master Plan & Preliminary Draft Major Development Plan for Third Runway**

Congratulations on your recent appointment as the Federal Minister for Infrastructure, Transport, Regional Development and Local Government. I write to kindly request a meeting with you to discuss Brimbank City Council's concerns with Melbourne Airport's proposed third runway.

At the Brimbank Council (Council) meeting on 17 May 2022, Council resolved that it did not support the 2022 Draft Melbourne Airport Master Plan (2022 Master Plan) & Preliminary Draft Major Development Plan for Third Runway (MDP) for the reasons outlined in the attached Submission, including that:

- a. The Master Plan and MDP do not adequately identify the environmental impacts reasonably expected to be associated with the proposed development.
- b. The Master Plan and MDP impose unreasonable and unacceptable health risks to the Brimbank community, as outlined in the Health Risk Assessment included in the Submission.
- c. The Master Plan and MDP do not include adequate plans for dealing with the environmental impacts, specifically including prevention and amelioration.
- d. The Master Plan and MDP insufficiently address a wide range of other matters in relation to Public Safety Areas, Access, Environment, Economic Development, Statutory Planning; and Community Engagement, as outlined in the Submission.

***Council is seeking that the Federal Government refuse the 2022 Master Plan and MDP.***

Council considers that the health impacts identified in Health Risk Assessment (HRA), which forms part of the Submission, represent an unreasonable and unacceptable risk to the Brimbank community, in addition to other significant impacts, without any consideration by Australia Pacific Airports (Melbourne) Pty Ltd (APAM) about meaningful ways to reduce and mitigate these impacts.

The HRA prepared by Tonkin & Taylor, and shown in the Submission, highlights that aircraft noise within the Australian Noise Exposure Forecast (ANEF) 20 & ANEF 25 exceeds the World Health Organisation Environmental Noise Guidelines (2018) (WHO Noise Guidance) and will result in an increased risk of adverse health effects within the exposed Brimbank population, including:

- A significant increase in the percentage of the exposed population that are highly annoyed by aircraft noise
- A significant increase in sleep disturbance in the exposed community, which may lead to increases in health effects such as cardiovascular disease and anxiety and depression.
- School children who live and go to school within the ANEF 20 and ANEF 25 contours are predicted to:
  - Experience a delay in reading and oral comprehension of between 3 and 5 months, compared to children in lower noise areas
  - Experience impacts from sleep disturbance, which may occur outside the normal night hours of 11pm to 6am
  - Potentially experience a lifelong effect on educational attainment impacts if exposure occurs during critical periods of learning at school, particularly given that exposure is predicted to occur within a population that is known to be delayed in their language and cognitive skills compared to the rest of Melbourne.
- That mitigation measures should be implemented to minimise the risk to the exposed community, and these measures should be based on national and international best practice.

APAM do not attempt to prevent or minimise the health impacts from aircraft noise on Brimbank in the 2022 Master Plan or the MDP, and this does not accord with the State Government's *Environment Protection Act 2017*, or best practice airport planning, where international airports provide a range of noise mitigation measures to address aircraft noise, including funded noise insulation schemes, compulsory acquisition, or a curfew.

In addition to refusing the 2022 Master Plan and MDP, ***Council is seeking the Federal Government to undertake a review of airport planning to:***

- Examine the aircraft noise system to minimise harm to human health and provide health impact guidance to protect community from aircraft noise. This should include the establishment of appropriate noise metrics that accord with health guidance established by World Health Organisation Environmental Noise Guidance 2018 (WHO Noise Guidance), and best practice noise prevention and amelioration measures to address noise exceedances.
- Require airports prepare Health Impacts Assessments (HIA), as part of the Master Plan and MDP that are assessed against WHO Noise Guidance.
- Require that the HIA undergoes an independent and expert peer review to ensure its veracity, and that the HIA and peer review are made available for public review.

- Require that APAM (Melbourne Airport) meet Victorian legislation, guidelines and standards in relation to the offsite impacts from the existing and any expanded operations of Melbourne Airport.

***Council is also requesting that the Federal Minister for Infrastructure, Transport, Regional Development and Communications and the Victorian Minister for Planning enter into a bilateral agreement in relation to any further development of the 2022 Master Plan and or the MDP, specifically including:***

- Appointing an Advisory Committee under section 151 of the Planning and Environment Act 1987, to provide a transparent, independent and public review process that enables impacted stakeholders to present their submissions for independent consideration.
- Requiring an Environment Effects Statement under the Environment Effects Act 1978, including:
  - A Health Impact Assessment for off-site impacts, specifically including the assessment of noise impacts against the World Health Organisation Environmental Noise Guidance 2018, and relevant state legislation like the Environment Protection Act 2017
  - Prevention and amelioration measures to adequately address noise exceedances, including options for a Federally funded noise insulation program, a noise curfew, voluntary property acquisition or other measures.
- Requiring a Comprehensive Impact Statement process under the Major Transport Projects (Facilitation) Act 2009.
- Requiring that Melbourne Airport meet Victorian legislation, guidelines and standards in relation to the offsite impacts from the existing and expanded operations of Melbourne Airport.

For further information please do not hesitate to contact Leanne Deans, Acting Director City Development by email on [LeanneD@brimbank.vic.gov.au](mailto:LeanneD@brimbank.vic.gov.au).

Yours sincerely



**Cr Jasmine Nguyen**  
**Mayor**

Attachment:  
Brimbank Submission to Melbourne Airport Master Plan and MDP - April 2022

s22(1)(a)(ii) - irrelevant material

**From:** Councillor Jasmine Nguyen - Mayor (she/her)

**Sent:** Wednesday, 1 June 2022 6:31 PM

**To:** King, Catherine (MP)

**Cc:** Councillor Support

**Subject:** 2022 May | Hon Catherine King MP | Brimbank Council Submission to 2022 Draft Melbourne Airport Master Plan & Preliminary Draft Major Development Plan for Third Runway

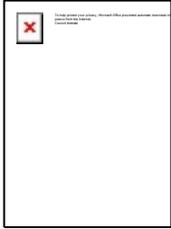
Hon Catherine King MP

Please find attached a link to the letter on Brimbank Council Submission to 2022 Draft Melbourne Airport Master Plan & Preliminary Draft Major Development Plan for Third Runway.

[To Hon Catherine King MP | Submission 2022 Draft Melbourne Airport Master Plan Third Runway May 2022](#)

[Brimbank Submission to Melbourne Airport Master Plan and MDP - April 2022](#)

Kind regards



**Councillor Jasmine Nguyen - Mayor (she/her)**

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 Brimbank City Council respectfully acknowledges and recognises the Wurundjeri and Bunurong peoples as the Traditional Custodians of this land and pays respect to their Elders past, present and future.

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