

**VICTORIAN ENVIRONMENTAL ASSESSMENT COUNCIL  
VEAC  
METROPOLITAN MELBOURNE INVESTIGATION**

**SUBMISSION BY**

**FRIENDS OF BANYULE INC**

**About Friends of Banyule**

*Friends of Banyule* is a not-for-profit community group formed in 2008 to campaign for the protection of the Banyule Flats Reserve, Warringal Parklands and Bolin Bolin Billabong area of the Lower Yarra corridor in Banyule - through Viewbank, Rosanna, Heidelberg and Bulleen.

**The value of the Yarra Valley river flats in Banyule**

Banyule Flats Reserve, including Banyule Swamp and Warringal Swamplands have been identified in the NEROC report as having State and regional significance, as they are examples of lowland riverine floodplains which are one of the most threatened landscapes in Victoria. Banyule Swamp is the most intact and biologically significant shallow freshwater marsh in the Lower Yarra.

This area supports rare and threatened fauna and a diversity of species including:

- 27 species of waterbirds
- 10 species of breeding migratory insectivores
- 4 species of bats

Banyule Flats at Heidelberg and Bolin Bolin Billabong at Bulleen have River Swamp Wallaby-grass (*Amphibrosus fluitans*), Western Water-starwort (*Callitriche cyclocarpa*), and is also habitat for four migratory bird species listed under both the JAMBA and CAMBA treaties and protected under EPBC: Great Egret (*Ardea Alba*); Cattle Egret (*Ardea ibis*); Latham's Snipe (*Gallinago harwickii*); Sharp-tailed Sandpiper (*Calidris acuminata*).

This locale is also home to two of Australia's most important art movements, the Heidelberg School (Streeton, Withers, McCubbin, Conder, Roberts and others) and across the river at Heide, the Modernists (Nolan, Tucker and others). This area has important historical and cultural connections not only for Melbourne and the State, but also nationally.

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PO Box 577  
Heidelberg VIC 3084

Email [info@friendsofbanyule.org](mailto:info@friendsofbanyule.org)

Web [www.friendsofbanyule.org](http://www.friendsofbanyule.org)

The area was an important cultural and ceremonial location for the Wurundjeri, traditional owners of the area, who regularly held coroberees along the river's banks and its billabongs, including Bolin Bolin (from which the suburb of Bulleen derived its name). Bolin Bolin Billabong is one of the few now remaining on the lower Yarra Corridor which was originally comprised of a series of billabongs. The remnants of these billabongs can now be seen on the Yarra in only a few remaining places including Kew and the Royal Botanic Gardens in Melbourne.

This whole area covering approximately 81 hectares is used extensively for both active and passive recreation by the local and regional community for walking, cycling, canoeing, picnicking, ornithological observations, school and club sports grounds, annual festivals and community activities. The outstanding Heidelberg School Artists Trail is also found here, with 20 signs in the area showing reproductions and descriptions of some of the most famous paintings of important artists in Australia's cultural history.

Another significant aspect relating to the importance of open spaces such as the Banyule Flats, Banyule Wetlands, Warringal Parklands and Bolin Bolin Billabong was referred to recently by VicHealth chief executive Todd Harper who said communities with access to green open space had a better quality of life, improved physical and mental health, and lower mortality rates. He said such space was particularly important for young children. (*The Age*, Dec 2010)

*Friends of Banyule* is working hard to protect this important conservation area together with other groups including Warringal Conservation Society with whom we work closely, as well as Protectors of Public Lands Victoria, Green Wedges Coalition, the Yarra River Action Alliance and others.

In 2009 a campaign to commence the process to have the area listed under National Heritage was launched. Banyule City Council took up the initiative but has yet to implement the proposed budgets and planning for it.

## **The proposed North East Link freeway**

*Friends of Banyule* is campaigning against the construction of the North East Link Freeway (formerly known as the F18), proposed by the previous State government. The route is planned to start from the end of the Western Ring Road to the north, along the Greensborough Highway, Banyule Creek in Viewbank, through the Banyule Wetlands, Warringal Park, Bolin Bolin Billabong, past Heide Museum (with a proposed major traffic interchange) and joining up with the Eastern Freeway at Bulleen.

The exact location of the route, which would cover about ten kilometres, has not been determined. The previous Victorian government made an application for federal funding for the project, which was refused. The published predicted cost of the project was \$6 billion (in 2008), but this figure appears to be a low order estimate only.

The previous Victorian government, which was strongly committed to the project, stated it would be built underground through the Yarra River flatlands, thereby claiming to reduce adverse environmental effects. Whether or not the proposed freeway could be constructed in a tunnel through the highly environmentally sensitive Yarra River flatlands is dependent on the receipt of federal funding for the project. It is clear that the project would be significantly more costly to build if it included tunneling. Consequently, in our view, it is more likely that it would be built wholly or partly as an above ground freeway, through this important conservation zone.

The proposed freeway was also projected by the previous government as a major freight route. However, it appears that the application for federal funding foundered because Infrastructure Australia and the Commonwealth were unconvinced about the need for the project. *Friends of Banyule* share this lack of conviction.

There is little doubt in our view that if the freeway were to be built, it would be largely used as a conduit for passenger vehicles, rather than freight traffic. In this regard, it would fit into the pattern of other major freeway projects in Melbourne whose wider effects have included the degradation of the natural environment, increases in car dependency and in the absence of an overarching strategy to develop an effective public transport and rail freight network. Costs will ultimately be incurred by the community as a whole and especially those households on the periphery of the metropolitan area, who urgently require adequate public transport infrastructure.

Our submission primarily addresses some of the major relationships between the quest for mobility in Melbourne as the city grows and the discomfiting implications for the availability and use of public land if the paradigm of motor car dominant mobility were to continue.

We also take the opportunity to draw attention to the consequences of the character of 'runaway' residential development including on the urban fringe, that has been permitted to continue unabated in Melbourne over the last decade or more and its threat to public land and urban liveability if the trend were to continue unaddressed.

## **Mobility and pressure on public land**

According to the Discussion Paper about 80,000 hectares of public land in Melbourne is devoted to road use (an estimated 73,000 hectares of Crown road reserves together with 6,225 hectares of VicRoads land.) This is equivalent to about 14.0% of the total land area (562,740 hectares) under investigation in the 29 municipalities concerned. Most of this road space is utilised by passenger motor vehicles. According to the ABS Survey of Motor Vehicle Use 2007 (ABS Catalogue 9208.0) about three quarters of all vehicle kilometres travelled on Victorian roads were by road passenger vehicles. Only about 7.5% of all vehicle kilometres are travelled by rigid and articulated trucks. According to VicRoads on average only about 1.22 persons occupy

each car travelling on Melbourne freeways and arterial roads (VicRoads, *Traffic Monitor 2007-08* (September 2009)). If anything the occupancy rate of cars on these roads has declined over the last decade. The proportion of the space devoted to buses is insignificant at about 0.78% of all kilometres travelled in Victoria (ABS Catalogue 9208.0). The share of road space taken by trams is unknown to us.

It appears that the proportion of total land devoted to road use varies significantly within metropolitan Melbourne. A perusal of the *Melway Greater Melbourne Street Directory* suggests that the proportion of all land assigned to road use is significantly greater in inner Melbourne than in middle and outer Melbourne. Indeed it may be as high as 40% in parts of inner Melbourne. It could be expected that in outer Melbourne much of the transport network has not yet been developed for future population growth whilst the road network in inner Melbourne is largely the legacy of previous residential, services and secondary industry development. Much of the latter has now been displaced.

We recommend that the Victorian Environmental Assessment Council examine the pattern of use of public land devoted to roads in various parts of Melbourne. In this regard we further recommend that particular attention be given to the scope for adapting this land for more sustainable transport modes, and especially public transport, to meet the future needs of the city and its residents.

Perhaps paradoxically, given the relatively high proportion of land devoted to roads in inner Melbourne, a larger proportion of trips made within and to and from inner Melbourne are made by means other than the private motor vehicle than is the case elsewhere in Melbourne. Primarily these other modes of travel are public transport trips by rail, and also tram and bus. Travel by bicycle and walking is also greater in inner Melbourne than in outer suburbs.

To illustrate this point Table 1, below, shows the mode of travel to work by householders in the inner city and the inner, middle and outer suburbs of Melbourne. As can clearly be seen the proportion of travel undertaken by public transport and other sustainable means is inversely related to householder proximity to the inner city. Generally speaking, outer urban residents are less able and less inclined to travel by public transport.

	Car driver/ passenger (%)	Public transport (%)	Walk only (%)	Bicycle (%)	Other (%)
<b>Inner city</b>	41.3	33.0	12.9	11.8	0.9
<b>Inner suburban</b>	62.7	30.1	2.1	4.5	0.7
<b>Middle suburban</b>	76.6	18.8	1.7	2.2	0.6
<b>Outer suburban</b>	87.8	10.2	1.1	0.5	0.5
<b>Metro average</b>	75.2	18.7	2.7	2.9	0.6

**Table 1: Modal share for travel to and from work, Melbourne**

Source: VISTA 07, Department of Transport Victoria

The current modal mix of transport in Melbourne constitutes a very inefficient use of urban space. It is evident from the foregoing that continuation of a "business as usual" approach to transport planning is putting Melbourne's public land at increased risk. If current trends continue, and the need for more sustainable transport capability for middle and outer suburbs, in particular, are ignored, the proportion of Melbourne's total land area which is devoted to motor vehicle traffic will increase markedly above the current 14%.

## Public transport for the future

The extent to which the various modes of public transport could assume their more rightful role in undertaking the passenger transport task in Melbourne might be appreciated from the rate of growth in public transport usage during the last decade. In the period 1999-2000 to 2009-10 annual train boardings in Melbourne increased from 124.2 million to 219.3 million, an increase of 76.5%. Tram boardings increased from 127.3 million to 178.1 million, an increase of 40% and metropolitan bus boardings increased from 91.6 million to 102.1 million, an increase of 11.5% (see *Track Record*, Issue 44, July to September 2010, Department of Transport).

It would be fair to say that during this period the previous State government, much less than having a programmed commitment to increasing the mode share of public transport in Melbourne, was genuinely caught out by the high growth in train and tram patronage. The relatively low growth in bus patronage is largely a function of poor service quality, including infrequent services and poor connectivity with related services, especially trains. This is particularly the case in the City of Banyule, which was to accommodate the route for the previous government's North East link freeway. More recent data on the performance of SmartBus services show that service frequency and strong linkages to other transport services are the key for patronage growth for buses too.

## Melbourne's transport footprint

Where car use is dominant in cities the use of urban space is commensurately inefficient. This is well illustrated by the relative carrying capacity of the different modes of transport, as shown in Table 2, below.

Transport mode	Carrying capacity (people per hour)
Road lane	1,000
Freeway lane	2,500
Bus lane	8,000
LRT line	10-20,000
Train line	50,000

**Table 2: Passenger transport capacity by mode**

Source: Professor Peter Newman, *Future Cities: What eastern Melbourne can do*, Presentation to the Eastern Transport Coalition, Doncaster, 4 July 2008.

It is clear that train services are the most space efficient transport mode and cars travelling on a normal road lane are the least space efficient. Further, these data do not take into account some very significant space costs typically associated with road traffic, including the permanent requirement for parking space at each end of any car journey and the significant extra buffer space required to offset external costs typically associated with car travel, especially road noise.

The decision taken in 2010 by the previous State government, with the support of the then Opposition parties, to expand the Urban Growth Boundary in the west, north and south east of Melbourne to cater for projected population growth has serious implications. It has been demonstrated that the unit cost of providing infrastructure for greenfields residential construction in these areas is significantly greater than for infill and brownfields redevelopment in established inner and middle suburban areas (see, for example, Roman Trubka, Peter Newman and Darren Bilsborough, *The Costs of Urban Sprawl (1): Infrastructure and Transportation* (Curtin University and Parsons Brinckerhoff 2010). Contiguous areas in outer metropolitan Melbourne are notoriously underserved by public transport, and especially by heavy rail and good connecting bus services.

The previous government had taken a decision to go down the high cost route with projects such as the North East Link to cater for population growth. In doing so it was relying heavily on the social and political costs of their actions becoming evident later rather than sooner.

Higher levels of mobility are a source of individual and social wellbeing. If motor vehicle use is permitted to continue to increase in the way that it has in recent decades, to achieve this desired objective the pressure for the alienation of greater amounts of public and private land for roads within metropolitan Melbourne will increase. This will particularly be so if the projected growth in population is realised. This would adversely affect the environment and the quality of life of Melbournians in a number of ways.

It would lead to significantly greater emissions of greenhouse gases than would be the case if these trips were to be made by other available means which are both more sustainable and more space efficient.

It would precipitate the alienation of more land which should be devoted to superior economic, social and environmental purposes for roads and car parks.

It would place additional pressure on land already in public use for open space and other purposes. For example, land that is used for parks could be diverted to roadways. This is the situation confronting the City of Banyule and its residents, with the proposed North East link.

The fact that as a general rule, residents of inner municipalities have access to relatively less public open space than residents of middle, outer and growth municipalities also needs to be considered in this context.

## **Planning and residential development: the impact on public land**

Trends over the last two decades or so for larger residential housing are having a major but largely unexamined impact upon Melbourne. Whilst there has been some increase in multi-occupancy developments that are more space efficient the unit size of single occupancy developments have increased markedly since the early 1990's. These have been characterised by the demand for super-sized houses, the so-called "McMansions", during a period when average household occupancy size has actually been in decline.

On the urban fringe in particular, there has been a simultaneous trend to build larger single occupancy residences on smaller allotments. In Victoria, this process is facilitated by the Building Code which permits construction on rear and side boundaries, subject only to fire regulations which require that no window should be closer than 0.9 metres of a boundary, and the observance of any easements. In so far as the Victorian Building Code is concerned, the back yard might no longer exist.

Environmental standards for multi-occupancy residential developments are much more robust with, for example, a requirement for a minimum proportion of permeable surface on the site and an open process to contest developer applications.

Non-government observers, at least, are starting to identify significant negatives in this now long-term trend for larger houses (see for example, Hall, Tony, *The Life and Death of the Australian Backyard* (CSIRO Publishing 2010)). These include the fact that it reflects a more sedentary mode of living and its related effects on health and well-being. Needless to say the consequent virtual denuding of large areas of residential Melbourne of large amounts of vegetation, is also having significant adverse environmental effects.

For the purpose of this inquiry *Friends of Banyule* are concerned that the rapid reduction in the availability of private open space will precipitate much greater pressure on public open space such as that available in the City of Banyule. In this respect there are already felt pressures on this space for competing uses, including passive and active recreation and organised sporting activity. These pressures are also being increasingly felt elsewhere in Melbourne.

We recommend that the Victorian Environment Assessment Authority draw attention to the seriousness of this situation and that it make recommendations to provide for the retention of sufficient outdoor space in all future residential developments and that a significant proportion be maintained as permeable surface to encourage the growth of vegetation.

## Other major issues/summary

Additional broad issues of concern which we recommend that the Victorian Environment Assessment Council take into account in this Investigation include:

- The need to adequately protect public open space by legislation from development or inappropriate use. In this respect, we recommend amendment of the Major Projects Facilitation Act to ensure that public land and public open space is sufficiently protected by legislative regimes in regard to conservation and the environment, that would normally apply;
- The need to halt the loss of public open space, bushland and grasslands in the green wedges around Melbourne leading to reduced amenity, loss of habitat, reduced recreational space and negative impact on the environment, including loss of biodiversity;
- The need to maximise the use of public land as an agent against climate change and the necessity to promote vegetation growth in the urban environment including tree canopy, to help maintain a cooling effect, clean air and offset heat sink impact of built structures and roadways;
- The need to protect waterways and riverine environments from overdevelopment along the banks of creeks, rivers and waterways, leading to loss of biodiversity and green linkages or hedgerow effects of connected natural habitat eg, along the Lower Yarra (we agree with the submission of Warringal Conservation Society at point six – recommending an increase in open space where possible especially in highly urbanised areas including the linking of urban parkland and reserves to provide habitat and wildlife corridors).
- The need to increase the amenity in recreational areas along creeks and waterways which is increasingly threatened by inappropriate/ high rise development within close proximity, causing a negative impact of private development intruding into the public realm;
- To protect against the inappropriate disposal of public land including former schools, hospitals, institutions, railway land etc, for private development, thus lessening the ability for ongoing or future public use or benefit;
- To favourably consider the introduction of a Metropolitan Open Space Strategy. In our view, the proposal would have potential benefits and should be investigated to develop a cohesive strategy for the protection of public land, recreational space and biodiversity. With increasing population and development pressures across the metropolitan area and beyond, this is now more urgent than ever.

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PO Box 577  
Heidelberg VIC 3084

Email [info@friendsofbanyule.org](mailto:info@friendsofbanyule.org)  
Web [www.friendsofbanyule.org](http://www.friendsofbanyule.org)

We would be pleased to provide further detailed submissions in writing or at hearings which may be held as part of the Investigation.

Yours sincerely

## **Marion Ware**

President  
Friends of Banyule Inc

(h) 9440 6448  
(m) 0413 418 832  
email: [friendsofbanyule@gmail.com](mailto:friendsofbanyule@gmail.com)

## **Dennis O'Connell**

Secretary  
Friends of Banyule Inc

(h) 9439 3175  
(m) 0409 184 926  
email: [dennisoc@bigpond.net.au](mailto:dennisoc@bigpond.net.au)