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Yarra City Council  
Strategic Planning Unit  
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Richmond  
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Email: [strategicplanning@yarracity.vic.gov.au](mailto:strategicplanning@yarracity.vic.gov.au)

Dear Sir/ Madam

**PTUA SUBMISSION ON ALPHINGTON PAPER MILL SITE DEVELOPMENT PLAN**

The Public Transport Users Association is the recognised consumer organisation representing passengers of all forms of public transport in Victoria.

This submission (see Attachment A) responds to the invitation by the City of Yarra to provide feedback on the revised development plans and complements the earlier submission made by the PTUA on 2 April 2015. The submission also addresses the implications of the proposed widening of the Chandler Highway on the project and for transport in the area more generally.

We would welcome the opportunity to meet with Councillors and Officers at their convenience to discuss the detail of the submission.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Tony Morton".

**Tony Morton**  
President  
Att.

## **ATTACHMENT A**

### **SUBMISSION BY PTUA: ALPHINGTON PAPER MILL DEVELOPMENT PLAN**

The PTUA made a submission to the Yarra City Council on 2 April 2015 in response to the proposed Alphington Paper Mill Development Plan in which we highlighted significant deficiencies in public transport provision in the area and which would be accentuated by the proposed development on the paper mill site. In essence, the opportunity exists to enhance public transport or to continue on the path of increased motor vehicle traffic in the area, with the attendant costs this would bring.

In this respect, we made specific recommendations on public transport provision to address these problems. In summary these included the provision of :

- higher-frequency train services on the Hurstbridge line, including outside peak hours and on weekends;
- Seven-day-a-week services on the 350 route bus (La Trobe University to the CBD on Chandler Highway), with evening services at least on weekdays and no less than 10- minute frequencies during peak hours;
- Seven-day-a-week services on the 546 route bus (Heidelberg to the CBD on Heidelberg Road), with evening services at least on weekdays and no less than 10 minute frequencies during peak hours;
- A more direct route for the 609 route bus (Hawthorn railway station to Fairfield) with services seven days a week and 10 minute frequencies during peak hours; and
- An extension of route bus 624 from Harp Junction in Kew to Alphington Station via Earl Street and Chandler Highway to provide a key north-south connector in the East Yarra and Darebin area.

Allied measures proposed by PTUA included:

- The declaration of Heidelberg Road, Grange Road and Chandler Highway as bus priority roads under VicRoads *SmartRoads* program, and provide associated bus signalling and lane priority; and, for the longer term,
- Preservation of the median reservation along the Eastern Freeway for a rail service to Doncaster, and an undertaking by the Victorian Government to plan and build this train line with a station at the Chandler Highway, on the south of the site.

To support these measures we recommended that Yarra City Council should commission modelling to assess mode shift and relief to traffic congestion to be gained from upgrades to public transport services and walking and cycling infrastructure serving the Alphington paper mill development project and surrounds and to so properly inform its planning and advocacy on the project.

On the site itself, we recommended that car parking should be minimised in anticipation of the provision of adequate public transport services and the provision of high quality walking and cycling infrastructure.

### **The revised development plan**

This submission responds in part to the revised development plan recently released by the project proponents which purports to address public feedback on the initial proposed development plan. We also discuss the recently announced proposal by the Victorian government to widen Chandler Highway between Yarra Boulevard and Heidelberg Road to six lanes.

From a transport perspective there are no material changes in the project proponents plans which would see significantly larger numbers of people using public transport, whether they be residents in the development, employees or visitors. This is regrettable given the otherwise natural propensity of projects of this general character to accelerate community-wide trends towards lower per capita car use in favour of public transport.

The Minister for Public Transport and Public Transport Victoria have been conspicuous absentees in the public discussion on this project. A spokesperson for Glenvill advised attendees at the public meeting held at Alphington Bowls Club on 27 October 2015 that Public Transport Victoria would respond to growing demand for services in the area when it occurred. Or, as characterised in the Integrated Transport Plan (GTA Consultants, August 2015, p. 36) there is a need to: "Advocate for improved bus frequency, service span, and days of service (i.e. including weekends) as the area develops towards a higher density residential area and employment catchment."

In our view this would be far too little too late. It has been amply demonstrated that to be most effective public transport services should be available to meet anticipated demand from the development, and not be hostage to the uncertain responses to an advocacy campaign by the Council and other interested parties. In this case the situation is rather worse, as existing public transport services are not meeting current demand given the need to effect mode shift from the private motor car to public transport in the wider area.

### **Widening of Chandler Highway**

Meanwhile, VicRoads, on behalf of the Victorian Government, is proposing to increase the scale of the Chandler Highway to six lanes between Yarra Boulevard and Heidelberg Road, a project which VicRoads claims to "future proof" the road for substantial future growth in motor vehicle numbers.

There is a legitimate source of anxiety for residents in the area, especially those who live immediately to the west of the Chandler Highway, because it promises a substantial diminution in their standard of residential amenity should the Chandler Highway be widened as proposed.

One resident who attended the public presentation on 27 October sponsored by the developer, Glenvill, suggested that homeowners near the paper mill development and Chandler Highway may each incur a capital loss of \$200,000 as a consequence of the project. Whatever these losses may be they should be seen for what they are: the consequence of the reallocation of environmental costs by official decision to local residents from the principal beneficiaries of the redevelopment of the paper mill site and of the widening of the Chandler Highway, principally occupiers and visitors to the paper mill development site and road users.

VicRoads has not provided information of sufficient quality and specificity on the current volumes of road traffic across the day on the Chandler Highway corridor, and especially during peak times, to sufficiently inform observers that the scale of the redevelopment of Chandler Highway between Heidelberg Road and Yarra Boulevard makes sense.

Generalised references have been made in public appearances by VicRoads representatives to an additional 90,000 extra residents who are expected to occupy inner northern suburbs in coming years which, *prima facie*, it is implied, provides a sufficient case to widen this segment of Chandler Highway to six lanes.

VicRoads claims average daily throughput on Chandler Highway of 44,000 vehicles per day. This is sharply at variance with daily traffic counts on the VicRoads website. This shows counts of 38,000 (seven day average), including 20,000 north-bound and 18,000 south-bound in 2013 with no increase in daily traffic volumes indicated in the period 2003 to 2013.

In the absence of good quality publicly available data we have extrapolated some other recently publicly released data which indicates that in the morning peak, 7.00 a.m. to 9.00 a.m. 3218 motor vehicles cross the Grange Road level crossing immediately north of the Chandler Highway. (See

[http://www.parliament.vic.gov.au/images/stories/committees/pomsc/Other\\_Docs/VicRoads\\_Report\\_05102015.pdf](http://www.parliament.vic.gov.au/images/stories/committees/pomsc/Other_Docs/VicRoads_Report_05102015.pdf)) Based on long-term average daily traffic movements on both Chandler Highway and Grange Roads, which suggest that daily traffic movements on Grange Road and Separation Street are about 58% of traffic movements on Chandler Highway, it may be concluded that there are now about 5,400 traffic movements on Chandler Highway between Heidelberg Road and Yarra Boulevard in the morning peak between 7.00 a.m. and 9.00 a.m. or about 1,350 vehicle movements per hour in each direction on average.

On the face of it, this comes nowhere near to justifying the widening of Chandler Highway between Yarra Boulevard and Heidelberg Road to six lanes. Assuming, say, a 60/40 directional split in the morning and afternoon weekday peak periods this still leave significant excess capacity based on current usage patterns by passenger traffic. How much, we do not know, as official data is not publicly available.

According to the Traffic Management Plan (GTA Consultants August 2015, Appendix C), the Alphington paper mill site project is expected to generate hourly traffic volumes in the weekday morning peak of 1,441 vehicles per hour and 2,217 vehicles per hour in the evening weekday peak, which would be entering or exiting the site from either Chandler Highway or Heidelberg Road. In aggregate, about half of these are trips by residents. This

reflects the proponent's expectation that public transport use will be low, with route bus services in particular contributing little to meet the transport needs of residents, employees and visitors to the site.

One thing of which we can be reasonably confident is that if the Alphington paper mill site development and the expansion of the Chandler Highway and the surrounding road network continue on the status quo basis embarked upon we may indeed be left with traffic counts in the order of 80,000 per day in relatively short order, with its attendant environmental problems and continuing congestion of the road network. This would precipitate significant re-engineering of the Grange Road corridor in Darebin and the Earl Street/ Belmore Road and Princess Street corridors in Boroondara and knock-on adverse effects on the environment and amenity in these areas.

### **Where is public transport?**

However, there is no reason to suggest that current passenger traffic movement patterns which are dominated by motor vehicle usage should prevail. They also contradict government aspirations for significantly greater numbers of trips to be made by sustainable means. The fact is that a very large proportion of existing and projected trips could and should be taken by public transport. These would include a large proportion of the daily trips to work from the Alphington paper mill development site, the majority of which have been assessed to be destined for Melbourne CBD or elsewhere in the City of Yarra. The absence of any upgrade to public transport services, therefore, will lead to significant increases in traffic volumes within the City of Yarra itself, either terminating or through traffic.

It is also understood that there are significant numbers of school trips in the morning peak in particular and also mid to late afternoons which involve return trips which further elevate traffic numbers on Chandler Highway in the absence of any route bus services on the corridor worthy of the name.

Alphington is a distinctly black hole in the public transport network in inner Melbourne which otherwise has strong connectivity in most directions, and especially in the south-east and the west, the source and destination of many trips from this location.

The implication raised in recent public consultation sessions on the Alphington paper mill site development and the widening of Chandler Highway that the widening of the highway is essential for public transport provision is something of a non-sequitur. One route bus has a carrying capacity of up to 80 passengers. To recall our calculations, discussed above and completed in the absence of reliable official data, there may currently be in the order of 1,350 vehicles per hour on the Chandler Highway during peak times. It takes relatively little imagination to envisage the impact that reasonable quality route bus services both on the north-south corridors, and city-bound, could have on these numbers in the name of a sustainable transport future as well as the maintenance of local residential amenity and the environment.