



Melbourne Metro Rail Project Inquiry and Advisory Committee

Expert Evidence Submission
Trees, Parks and Public Open Space
An ecological, cultural and economic
assessment

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Sustainability
12 August 2016

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List of Abbreviations

MMRA – Melbourne Metro Rail Authority

MMRP – Melbourne Metro Rail Project

EAS – Emergency Access Shafts

EES – Environmental Effects Statement

EES App R – Refer to the MMRP –Technical Appendix R Aborigiculture

PSA – Planning Scheme Amendment

CoM – City of Melbourne

MPA – Metropolitan Planning Authority

EMF – Environmental Management Framework

EPR – Environmental Performance Requirement

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1. Details of Qualifications

1.1 Name of Expert

Ian Shears
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City of Melbourne
Level 6, 240 Little Collins Street
Melbourne VIC 3000

1.2 Qualifications

Master of Applied Science (Horticulture), University of Melbourne, 1998

'Ian Shears is one of Australia's leading experts in urban landscapes and urban forestry. He has specialised in green infrastructure management for over 20 years and has worked for over a decade with the CoM. Ian and his team have been credited with the development of some of Australia's most progressive environmental projects and policies. Ian presents regularly at a range of conferences, nationally and internationally, across a broad range of topics including urban forestry, landscape adaptation to climate change and green governance.' (from *LinkedIn* profile)Area of expertise

Professional experience (overview)

I am an experienced practitioner in public open space design, implementation and management, and have practiced in private enterprise, academia and local government for over 20 years.

I joined the CoM in 2000 to lead the Tree Planning portfolio and was Manager, Urban Landscapes since the Branch's inception in 2010. I now manage the Urban Sustainability Branch within the CoM, which was created in 2015 via merging the Urban Landscapes and Sustainability Branches within the newly formed City Strategy and Place Group, with the mandate to lead Council's climate change mitigation and adaptation programs.

I am recognised professionally at a national and international level for conceptualising and driving the CoM's reputation for its green infrastructure, and as an advocate for sustainable design, development and management of public places.

I have delivered numerous addresses to conferences and seminars at local and international levels, and have authored, co-authored and contributed to numerous publications.

Urban Sustainability, City of Melbourne

Urban Sustainability leads and implements the CoM's strategies, programs and projects to improve the sustainability of the built and natural environment in Melbourne for current and future populations. The Branch's current policy research focuses on: understanding the health and economic benefits of green infrastructure, biodiversity and ecology in cities; climate change adaptation; green governance, open space and the urban forest; integrated water management; and urban heat island mitigation. Over the past five years, our multi-disciplinary team has delivered a \$50 million climate adaptation program focused on green infrastructure planning in the public realm, and numerous open space projects which increase the amount of open space in the municipality. Our dynamic, multi-disciplinary

team has also developed some of Australia's most progressive environmental policies at a capital city level, which include: the Urban Forest Strategy, Open Space Strategy, Urban Forest Guidelines, Growing Green Guide, and comprehensive input into Total Watermark. (For full listing refer Item 1.8 below.)

This strategic framework collectively forms the basis for:

- implementing programs to increase the quantity and quality of the urban forest and open spaces within the municipality;
- working as part of advisory teams with other areas of Council on issues, tasks and special initiatives including traffic management, urban design, community benefits and wellbeing, and sustainability; and
- providing expert advice to other municipalities in Melbourne, regional areas and interstate on matters affecting tree health and management.

Awards

The progressive approach of the CoM's Urban Landscapes Branch to adapting the city to future climate change has achieved the following notable awards:

- *Best Specific Environmental Initiative for Local Government 2013 by the United Nations*
- 2014 City Climate Leadership Award in Adaptation and Resilience, C40 and Siemens
- Inaugural Climate Change Adaptation Award by the Banksia Foundation, 2013
- The Victoria Medal for Landscape Architecture 2014, Australian Institute of Landscape Architects
- National Public Engagement and Community Planning Award, Planning Institute of Australia, 2016
- 2014 Award Winner Environment Category for Australasia, International Association for Public Participation (IAP2) Australasia
- National Greenlife Infrastructure Award, Nursery and Garden Industry of Australia, 2015
- Excellence in Research and Innovation, Stormwater Victoria, 2014

1.3 Assistance in preparing evidence statement

This statement was prepared with assistance from the following CoM staff:

- Gail Hall, Team Leader, Open Space
- Angela Hill, Senior Open Space Planner
- David Callow, Senior Urban Forester
- Daniel Tipping, Arboriculturist
- Arran Provis, Arboriculturist

1.4 Instructions

Instructions were received via a letter from Hunt and Hunt Lawyers dated 28 July 2016, along with additional verbal instruction from Karen Snyders from City of Melbourne on 1 and 2 August.

A further letter of instruction was received on 3 August 2016 from Hunt and Hunt Lawyers, with further verbal instruction and feedback on 10 August.

An additional letter of instruction was received on 11 August 2016.

Letters of instruction attached.

1.5 Details of any external expertise

This statement draws upon expert assessment and advice supplied by the MMRP EES Technical Appendix R: Arboriculture: *Arboriculture Impact Assessment – Melbourne Metro Rail Project*, John Patrick Pty Ltd, April 2016 (EES, App. R)

This study provides a comprehensive methodology, spatial analysis and evaluation covering the following:¹

- Risk assessment which considers the potential impact to trees within the MMRP precincts' associated with the construction activities and operation of Melbourne Metro, including potential consequences that might arise;
- Level of impact rated for trees in the public realm (semi-mature, mature and over-mature trees) that contribute to the urban landscape and which are considered to be viable beyond the anticipated time frame of delivery of the project; and
- Recommended adherence to the Environmental Performance Requirements AR1–AR5.

1.6 Facts, matters and assumptions

1.6.1 Reference documents

The main documents considered in preparing this evidence has been the CoM's MMRP submission on the EES dated July 2016, MMRP EES – Chapter 16 Landscape and Visual, Chapter 23 Environmental Management Framework, and relevant the MMRP EES Technical Appendices L, P and R.

Consideration of other recent studies include the work undertaken by Urban Strategy: *Review of Tree Impacts and Potential Removals as part of the Metro Tunnel Project*, August 2016.

This submission is informed by the following relevant City of Melbourne policy documents and strategies:

- Urban Forest Strategy – Making a Great City Greener 2012-2023
- Open Space Strategy – Planning for Future Growth, 2012
- Draft Urban Ecology and Biodiversity Strategy (Draft 2016)
- Kings Domain – Domain Parklands Conservation Management Plan (Draft 2016)

- Urban Forest Diversity Guidelines, 2011
- Tree Retention and Removal Policy, 2012
- South Yarra Urban Forest Precinct Plan 2013-2023
- Central City Urban Forest Precinct Plan 2013-2023
- Fawkner Park Master Plan, 2006
- Fawkner Park User Study, IOSS, 2016
- Domain Parklands Master Plan Discussion Paper, 2016
- Zero Net Emissions Strategy – Update 2014
- Total Watermark: City as a Catchment – Update 2014
- Climate Change Adaptation Strategy, 2009
- Growing Green Guide (2014)

2. Executive Summary

2.1 Introduction

This statement has been prepared to consider the arboriculture, parks and open space impacts from MMRP associated with:

- removal of trees and mitigation measures;
- permanent loss of planting sites, and
- sites of significance, including sections of the Kings Domain, Queen Victoria Gardens, Fawkner Park and St Kilda Road,

This statement assesses the potential impacts on the CoM's trees and open space assets having regard to the policies, principles and management programs that guide decision-making for public open space within the CoM. The statement provides further substantiation in support of the options, issues and deficiencies that have been incorporated into the *Melbourne Metro Rail Project, Environmental Effects Statement, City of Melbourne Submission*, July 2016.

In particular, this statement considers the impact of proposals related to:

- EASs – Concept Design (Fawkner Park) and Concept Design and Alternative Design Option (Kings Domain)
- Rail tunnel alignment at CityLink intersection – Concept Designs and Alternative Design Option (Kings Domain)
- Impact on other areas within the following precincts: Western Portal, Arden Station, Parkville Station, CBD North Station, CBD South Station and Domain Station.

The statement does not provide an assessment of potential impacts to trees managed by: VicTrack, the City of Port Phillip, the City of Stonnington, the University of Melbourne, or other trees on private land.

The majority of the MMRP is to be located underground. This would reduce the number of trees that need to be removed above the proposed tunnel alignment, except for the CityLink tunnels crossing in the Domain Parklands. The benefit of siting stations and mined construction methodology under Swanston Street would mean that the proposed rail tunnels would be too deep to have any significant impact on trees located at ground level in this area. Trees would only be impacted on and/or require removal at sites for the proposed surface emergency and other access shafts.

However, the tunnelling and associated works have the potential to damage numerous large and significant trees located within various historic, high use parks and roadways within the CoM. Some of the most significant areas to be impacted include Tom's Block, Domain Parklands, Queen Victoria Gardens, Fawkner Park, Edmund Herring Reserve, and Grattan Street and Royal Parade.

The primary opportunities in these areas where trees necessitate removal to facilitate construction work would be to replant in accordance with the CoM Urban Forest Strategy, Open Space Strategy, and the requirements of relevant cultural heritage conservation management plans.

I would encourage that all future replacements of trees that have been removed for the MMRP would be of a high standard and at least – or greater than – the existing number of trees removed. To this end, I understand that the CoM would work cooperatively to establish a growing-on program for all

replacement stock as far in advance as possible and the CoM could oversee or manage the procurement of appropriate replacement stock.

3. General Overview

3.1 Introduction

Melbourne has been traditionally regarded as Australia's 'garden city', recognised for its world-renowned network of parks, gardens and streetscapes. The urban forest is a critical element of the city's fabric, liveability and cultural heritage.

The construction of the MMRP will have a significant impact on a number of public realm spaces and assets within the CoM. This submission addresses these impacts on trees, parks and public open space, informed by a range of Council's strategic and policy positions. Given the likely extent of change, it is important that the outcomes of the Project are aligned with Council's strategic perspective to ensure that the ultimate urban landscape contributes positively to the city, and wherever possible gains a net improvement on existing conditions.

The city's open spaces, park networks and urban forest are highly valued by the community and provide fundamental environmental, social, cultural and economic contributions to Melbourne. These 'green infrastructure' components are critical elements of Council's response to rapidly growing population and a changing climate. The City of Melbourne's *Open Space Strategy* (2012), *Urban Forest Strategy* (2012), *Climate Adaptation Strategy* (2009), and *Total Watermark – City as a Catchment* (Update 2014) are the primary documents supporting green infrastructure and water management planning.

Places throughout Melbourne's extensive open space network have highly specific and valuable roles; in particular:

- Domain Parklands are a 'Capital City and State' level open space, which is defined as: 'iconic and synonymous with the character and identity of Melbourne and often used to stage activities and events of international, national, state and metropolitan importance',² thereby catering to broad public needs.
The Domain Parklands were placed on the Victorian Heritage Register in 2013.³
- Fawkner Park is a 'Regional' level open space, which are 'valued and visited by a broader catchment of people as well as the local community'.⁴
Fawkner Park has been on the Victorian Heritage Inventory for some time and has been nominated in May 2016 for listing on the Victorian Heritage Register,⁵ with a final assessment pending.

Therefore, the liveability of Melbourne and the health and wellbeing of residents, workers and visitors is fundamentally linked to the green infrastructure of the city, and highlights the need for its preservation and enhancement as part of the construction processes and outcomes of the MMRP.

3.2 Issues

3.2.1 Valuing the urban forest

The CoM's world-renowned network of parks, gardens and streetscapes contribute to Melbourne being one of the most liveable cities in the world. The city is also acclaimed for its biological diversity. Biodiversity is a fundamental driver of human health and wellbeing in cities through the direct provision of ecosystem services such as pollution and water filtration, shade and nutrient cycling and

urban cooling; and indirectly by providing resilience to a changing urban ecosystem. In highly modified landscapes, it is the sum of all species that plays the crucial role in the provision and conservation of biodiversity and the maintenance of ecosystem services.

The longevity of this green legacy is to some degree under threat through the changing climate, new diseases and the pressures of increasing urban density to accommodate a vastly growing population. Under these variable conditions, the lifespan and efficiency of trees and other vegetation to provide necessary ecosystem services is also threatened.

I consider that the CoM's urban forestry and open space programs provide a multidisciplinary approach to the design, development and management of the city's natural resources 'in a way that respects Melbourne's unique character, responds to climate change and urban expansion, and underpins the health, liveability and wellbeing of the city and its inhabitants. The CoM programs, include objectives to guide the evolution of the urban forest and green infrastructure to be resilient, robust, healthy and diverse, and that meet the needs of the local and wider community.

The benefits of the urban forest are increasingly understood to have direct economic and political value, in addition to their more traditional perception within the community and public policy for their environmental aesthetic and cultural roles. Worldwide, environmental benefits are being quantified more accurately and more frequently in economic terms, with communities realising that green infrastructure is an economical long-term investment that reduces the need for much greater expenditure on 'grey infrastructure'.⁶ Contemporary valuation of urban trees identifies amenity and environmental service provision by utilising an amenity value formula. The CoM's *Tree Retention and Removal Policy* (2012) adopts an agreed standard widely used in urban local government authorities. This formula has been utilised since 1997 to place a value on trees to both protect these assets and to secure compensation that result from tree loss.

3.2.2 Assessment of risk to trees

The overall context for the evaluation of risks arising from Melbourne Metro is described in *EES Technical Appendix B: Environmental Risk Assessment Report*. The specific context for the arboricultural impact assessment is as follows:

The study area lies within and under some of Melbourne's most noted parks and treed avenues, as well as other areas where trees are prominent components of the public realm and are valued by the community. The Melbourne Metro alignment and associated infrastructure potentially interacts with trees at discrete locations, including parks and treed avenues, for the construction of stations, EASs and construction work sites. Melbourne Metro would be constructed in a manner that minimised tree loss during construction and was aligned with the requirements and outcomes of the [relevant plans and strategies]⁷

In its methodology, the EES App. R identified that:

"Existing controls were identified to inform the assessment of initial risk ratings. These existing controls are based on statutory requirements, aspects that are inherent in the project design and standard requirements that are typically incorporated into construction contracts for rail projects. For the purposes of assessment, the level of consequence was rated for trees in the public realm that already contribute to the urban landscape (semi-mature, mature and over-mature trees) and which are considered to be viable beyond the anticipated time frame of delivery of the project, that is trees with an assessed useful life expectancy (ULE) of 10 years or more. This category is described as medium and long-term viability (MLTV) trees.

*Conversely, removal of juvenile trees or those with very limited ULEs was assumed to have a low impact.*⁸

Based on the concept designs and alternative design options, the following assumptions have been taken:⁹

- All trees located within proposed construction areas are assumed to require removal. This is a conservative assumption, as in some cases the recommended Environmental Performance Requirements provide an opportunity to retain some trees within construction areas;
- Trees located in road reserves adjacent to, but outside, construction areas are assumed to be retained; and
- Methodologies for early works (services relocations) can be implemented using tree sensitive construction.

It is my understanding that trees with a high (i.e. greater than 20%) encroachment will require removal or additional mitigation consideration.

Because much of the tunnelling associated with the project occurs at depth, few impacts are anticipated to trees above tunnels at ground level. The primary impacts would occur at discrete locations where works at ground surface level are proposed to be carried out (i.e. stations, EASs and construction work sites) which are generally well separated from each other. The impact in terms of tree loss (or potential damage) would therefore occur in localised areas, rather than along the entire project boundary.

The EES App. R identified that the primary risks for the construction relating to the removal of trees are 'within the Parkville, Domain and Tunnels (Domain Parklands, Tom's Block) precincts. In these areas the initial risk was assessed as high and the residual risk also remains high as the level of consequence, significant removal of MLTV trees within these precincts and replanting to re-establish 40 per cent canopy cover, cannot be further mitigated with Environmental Performance Requirements.

The residual risks elsewhere (Western Portal, Arden, CBD North, CBD South and the balance of the Tunnels Precinct), where trees are potentially to be removed for portals, station boxes, access shafts and associated construction, are medium. The residual risks for potential damage to trees to be retained on the periphery of construction areas is low, as these impacts can be managed within the scope of specific Tree Protection Plans prepared for each precinct.¹⁰

3.2.3 Environmental Performance Requirements

I understand that the CoM has provided extensive feedback into the EPRs, which have been recommended to reduce risks and hence determine the residual risk rating. The recommended EPRs are incorporated into the EES Chapter 23 Environmental Management Framework, and are generally consistent with Council's standard approach for development within the municipality.

In summary, the EPRs seek to avoid tree removal wherever possible, however some of the EPRs require amendment to be more specific to align with CoM's strategy policy for the protection and management of the urban forest.

The table below is a summary of my recommendations with regards to review of the relevant proposed EPRs in the EES Chapter 23:

EPR Ref	Supported / Disagree	Suggested Changes
LV1	Disagree – requires strengthening to avoid permanent loss of, or impact on, open space in Queen Victoria Gardens, Domain Parklands and Fawkner Park from the tunnel and EASs	Amend to read in addition: 'The location and design shall be undertaken to avoid temporary and permanent loss of parkland.'
LV2	Supported	
LV3	Disagree – this EPR should include operation in addition to construction.	Amend to include operation in EPR and timing.
AR1	Agree	
AR2	Agree	
AR3	Disagree	Amend to include in first dot point the CoM Urban Forest Precinct Plans for Carlton, South Yarra and CBD as Policy Documents that must be followed.
AR4	Agree	
AR5	Disagree	Amend to read in addition: Include additional sentence For CoM trees that are removed payment shall be made for the Amenity Value and Ecological Services Value in accordance with the CoM Tree Retention and Removal Policy.

At this stage in the project, Tree Protection Management Plans have not been supplied, nor information of Tree Protection Zones (TPZs) in accordance with AS4970-2009. The location of all trees must be accurately surveyed, and all impacts and removals should be determined after TPZs are applied to each tree and then encroachment percentages determined.

3.3 Deficiencies

It is noted that the MMRP EES broadly advocates for the protection and retention of trees, **but there is insufficient consideration of the significant contribution that trees make to the city through their amenity value**, the provision of ecosystem services or the mitigation of the urban heat island effect. Many trees within the parks and open spaces impacted by the MMRP are of high environmental and cultural significance due to their size, species, age and historical association.

The EPRs do not sufficiently address the issue of compensating for tree loss, nor does the EES adequately provide protection of the urban forest.

Of particular concern are locations where there is a possibility for long-term detrimental change.

4. Fawkner Park

This section specifically addresses the issues and impacts on trees and open space posed by the proposed eastern 'Concept Design' of the EAS in Fawkner Park.

However, I understand that late references have been made to the IAC that MMRA are now no longer pursuing the 'Alternative Design Options' for the EAS and TBM launch site at the Fawkner Park Tennis Centre, Community and Children's Centre.

4.1 Summary of Key Issues

The Keys issues at Fawkner Park are:

- The proposed EAS will result in permanent loss of open space including access requirement for operations;
- The location of the EAS in Fawkner Park would result in a loss of visual and landscape amenity of the park;
- Construction of the shaft would result in the direct loss of trees and potential detrimental impact on the health of other trees; and
- Impact of construction is likely to impact on a greater number of trees than indicated by MMRA Arboriculture Impact Assessment.

4.2 Options

Two EASs are required for the MMRP: one between the proposed City South and Domain Stations, and one between Domain Station and the Eastern Portal. (Refer to Section 5 below for consideration of the EAS location options in the Kings Domain.)

It is my view that:

- The Concept Design location for the EAS within Fawkner Park should not be supported; and
- The CoM would work with the MMRA to develop an alternative location for the EAS between Domain Station and the Eastern Portal that would potentially avoid impact on the established recreation areas and valued parkland.

4.3 Issues

4.3.1 Site description

Fawkner Park is a 'regional' open space in the CoM, and is one of Melbourne's best-known and well-used parks. Its long tree avenues and open lawn layout continue to provide a setting for a wide range of sporting and recreational activities. Some of the specimen tree plantings that survive are typical of park designs of the late 1800s and early 1900s – grouped into informal or formal arrangements, these plantings are an important part of the park's history. Groups of trees also break up large expanses of grass and create more intimate settings for less structured, passive recreation.¹¹

Fawkner Park is Crown Land permanently reserved pursuant to the provisions of the Crown Land (Reserves) Act 1978. The area is also subject to a Restricted Crown Grant for Public Park Purposes granted jointly to the Minister for Planning and the CoM. Fawkner Park lies within the Public Park and Recreation Zone (PPRZ) of the Melbourne Planning Scheme. It is also subject to Heritage Overlay 6 for the South Yarra Precinct. The site has been nominated in May 2016 for inclusion on the Victorian Heritage Register.

The CoM commissioned the *Fawkner Park User Study* (IOSS, 2016) to examine and document all recreational uses of Fawkner Park. The investigation and findings established that the park is very well used for both passive and active recreational uses, with 9,109 people using the park on weekdays – with notable peak use times the early morning, lunch time and after work hours – and 5,606 people using the park on a weekend day. In terms of overall usage, the report notes that ‘Fawkner Park receives **just under 3 million visits a year** – in comparison, the MCG receives 3.25 million attendances a year for sporting events.’¹²

4.3.2 Emergency Access Shaft – discussion

The MMRP concept plan shows the construction area association with the creation of the shaft to be located adjacent to a circular stand of trees. This is a historic stand of National Trust registered trees of regional significance that were planted when the area was used for cattle grazing. The planting of the circle of trees allowed for them to be fenced so they would not be eaten by cattle.¹³ The construction area is within the tree protection zone of these trees that should be protected from any such activities. The use of this site would also require a crossover for use by emergency vehicles which would further impact on the visual and landscape amenity of Fawkner Park.

The above ground structure of the EAS would occupy a footprint of approximately 144 sq.m (12m x 12m) with a height of 4.6m. However, as the EES CoM submission points out: ‘The construction of the shafts would require excavation. The construction site area for the shafts extends well beyond the shaft footprint. ... which would result in a significant visual, landscape and heritage intrusion into a highly significant area to an extent that is deemed to be unacceptable by the CoM.’¹⁴ It is also to some extent unclear as to what associated infrastructure is required around the shafts for ongoing operations. In any case, this is an effective loss of usable green space, and the EAS as proposed will be visually intrusive and ‘out of place’ in the setting of the park.

The Review of Tree Impacts and Potential Removals (Aug 16) report [Aug 16 Review] identifies that prospective removal of trees in this precinct is as follows:

Location	No. trees that will be impacted as reviewed by CoM	Amenity value of trees identified in assessment by CoM	Additional trees that may be impacted due to works
Fawkner Park – Emergency Access Shaft N-E Corner	8	\$283,177.29	4

A total of 8 trees would potentially require removal in this section of Fawkner Park, at an amenity replacement cost of \$283,177.

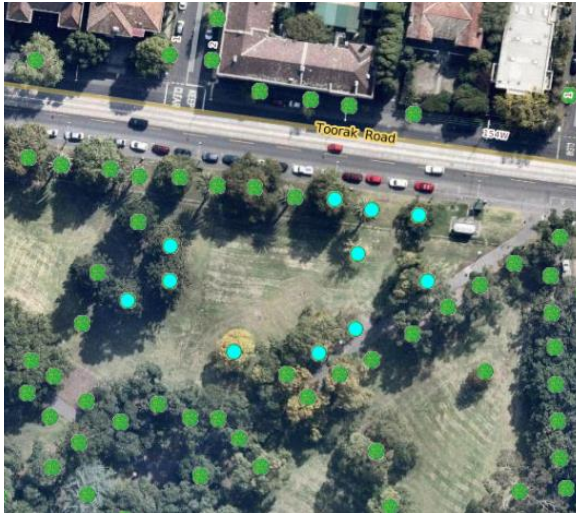


Figure 1 Trees expected to be impacted upon in the north-east corner of Fawkner Park

For this site it was noted that there was an impact upon Tree F238 (*Araucaria bidwillii* Bunya Bunya Pine), whilst there was no impact recorded upon any other trees that are in close proximity.

As the Tree Protection Zones (TPZ) of these trees overlap, it would be expected that there is an impact on one tree, encroachment will occur on the TPZ of others.

The amenity value of Tree F239 (*Araucaria bidwillii*) is \$108,622.84 – excluding the environmental services valuation. This highlights that there is the potential for impact upon large and significant trees that has potentially not been factored into the EES assessment.

4.4 Conclusions

Fawkner Park is a highly used and valued regional open space. The Fawkner Park Masterplan identifies one of the outstanding values of the park as the landscape character with simple open character of the park and long straight avenues lined with trees defining characteristics. The siting of the EAS in Fawkner Park will be dominating and out of place in the setting of the park and in conflict with the established character. The insertion of the EAS will result in a permanent loss of this valuable open space, loss of visual and landscape amenity, loss of mature trees and likely damage to further trees. The use of Fawkner Park as a location for the EAS is not supported and it is recommended that an alternative location outside of Fawkner Park must be identified.

5. Tunnel alignment options below Domain Parklands and Emergency Access Shaft

This section specifically addresses the issues and impacts on trees and open space posed by the proposed:

- ‘Concept Design’ and ‘Alternative Design Option’ for the vertical alignment of the MMR rail tunnels in at the CityLink intersection, and
- ‘Concept Design’ (Queen Victoria Gardens) and ‘Alternative Design Option’ (Toms Block) for the location of the EAS.

5.1 Options

Two options are proposed for the MMRP tunnel alignment where it intersects with the CityLink tunnels:

- The Alternative Design Option for the MMRP tunnels below CityLink tunnels is strongly supported.
- The Concept Design for MMRP tunnels above CityLink tunnels is not supported.

Two options are proposed for the location of the EAS:

- The Concept Design for the Emergency Access structure on the site adjacent to Linlithgow Avenue in Queen Victoria Gardens is not supported.
- The Alternative Design Option for the siting of an EAS in Tom’s Block is not supported, however the CoM is negotiating an alternative site within this area that could be supported and integrated with the Domain Master Plan currently under development.

5.2 Issues

5.2.1 Site description

The Domain Parklands are a treasured and important part of Melbourne. They are ‘capital city and state’ open space in the CoM, and are zoned Public Park and Recreation Zone (PPRZ) in the Melbourne Planning Scheme. They are within Heritage Overlay 398 which applies specifically to these parklands. The Domain Parklands are also included on the Victorian Heritage Register (VHR H2304). They have always played a major role in the life of Melbourne, as a place of recreation, civic function, respite and events.

The historic values described in the Victorian Heritage Registration of the Domain Parklands¹⁵ include the visual presentation of a contrasting and diverse landscape of high landscape and aesthetic value and an outstanding collection of trees and plants. The dominant character of the parklands today are open grassy lawns framed by trees, networks of paths, garden beds and horticultural displays with interspersed water features, art works and statues. The area is defined by perimeter avenues of large, deciduous trees with central areas of lawns planted with a diverse array of deciduous and evergreen trees and scattered large palms. Many of the trees within the Domain Parklands are of 19th century

origin. The avenues, rows and specimen trees through the parklands are a fundamental component of the VHR statement of significance for the place.

The Kings Domain exhibits three key periods of development in its layout, form and fabric – exhibiting many layers of development, planning and elements:¹⁶

- Mueller pinetum period
- Guilfoyle/Sayce picturesque period
- Interwar garden design of Hugh Linnaker

A Master Plan for the Domain Parklands was prepared by the CoM in 1997 which has guided planning and management of the area over the past 20 years. Various precinct-related plans and initiatives (including tree planting, memorials and other environmental and cultural projects and programs) have taken place in the Domain over this period. A new Master Plan is currently underway, to be completed by 2017. Part of the vision for the area is to bring the individual parts of the park together to recognise the magnificent parklands as ‘one Domain’, while also celebrating the individual places within it.¹⁷

During the first phase of community engagement for the new master plan, the responses highlighted the immense value that people placed on the Domain Parklands, ranging from the parklands as a whole to individual parts and elements. This encompassed (amongst many points of view): the views into, from and within the site; the trees, garden beds and ornamental spaces; the major events and activity spaces; the sense of enclosure and seclusion from the city; and the environmental function of ‘nature in the city’ to urban and community health.

The *Domain Parklands Conservation Management Plan* (Context, 2016) was commissioned to inform the future development of the new Domain Parklands Master Plan. The conservation plan comprises several volumes and presents a Statement of Significance for each of the Parklands’ open space precincts.¹⁸

The Toms Block area of the Domain Parklands is an area of approximately 2ha, bounded on the western side by St Kilda Road and on the eastern by Linlithgow Avenue. Toms Block is a significant component of the green edge that runs along the eastern side of St Kilda Road from Princes Bridge to Domain Road, and is located along the axis of the Shrine view from the central city. This is an area of highly valued visual character, comprising a scattered canopy that is consistent through much of the north of the Domain Parklands. Throughout are significant trees, memorials and art works, and the overall presentation is of a green and treed landscape of depth.

Linlithgow Avenue is bordered by rows of mature Dutch Elms that are rated of primary significance as a consistent single species avenue planting of large deciduous trees. Any loss of individual trees will be detrimental to the integrity of this significant avenue. The Tan Track runs along the eastern side of Linlithgow Avenue and carries 4,000–6,000 users per day, year-round.

The Toms Block section is integral to the Domain Parklands and is not a suitable area for a works site, nor for a permanent change in character and function.

5.2.2 Alignment of MMR tunnel – discussion

The Concept Design for the proposed MMRP tunnel over the CityLink tunnels will have significant construction and legacy impacts on trees and landscape values within the affected parts of Toms Block in the Domain Parklands.

The proposed alignment includes a buffer area to either side of the tunnels. The MMRP EES describes the impact of the option to cross over the CityLink tunnels as¹⁹:

The number of trees requiring removal at Tom's Block would be confirmed at the detailed design phase of Melbourne Metro. A total of 55 trees (including up to 30 mature trees) could potentially require removal due to the ground stabilisation works at the shallow tunnelled section above the CityLink tunnel. There may be some difficulties in planting new trees in this locality as there would be a need to provide a hard stand permanent access to the shaft site from Linlithgow Avenue.

This option would have a high landscape and visual impact during construction. At operation, Melbourne Metro would have a low residual landscape and visual impact, as replanted trees, paths, grass and recreational assets would be returned to pre-construction condition.²⁰

The CoM's submission to the MMRP EES states that the proposed 'tunnel alignment above the CityLink tunnels would have a greater impact at ground level than the lower alignment. The former would require permanent ground stabilising works in Tom's Block.'²¹

The impact of the works required for ground stabilisation would be significant, and would result in the removal of trees from Toms Block more directly as a result of the ground stabilisation works than as a result of the tunnel boring. From the information supplied in the EES Technical Appendix P Chapter 19, this suggests will lead to a permanent change to the current landscape.²² The severity of this impact is acknowledged by stating that shallow cover to the ground surface to limit ground settlement and the risk of ground collapse over the CityLink tunnels is a likely control²³, and that this site could only be remediated, not reinstated if this above CityLink option was pursued.

As the ground stabilisation works include the use of concrete grouting to stabilise the soil, it is likely that remediation measures would not allow for tree replanting and landscaping to a level of reinstatement commensurate with the existing conditions. This would result in permanent impacts to the visual quality and heritage significance of the landscape, and may be further exacerbated should the location of an EAS in a central location of Tom's Block be implemented. (Refer to 5.3.3. below.)

The Aug 16 Review identifies that prospective removal of trees in this precinct is as follows:

Location	No. trees that will be impacted as reviewed by CoM	Amenity value of trees identified in assessment by CoM	Additional trees that may be impacted due to works
Tom's Block – CityLink tunnels	47	\$1,421,570.43	76

A total of 47 trees would potentially require removal along the rail alignment, at an amenity replacement cost of \$1,421,570. While this not a large number of trees within the overall extent of Domain Parklands, Toms Block is located close to St Kilda Road and contains a number of notable specimens. This would include loss of trees from the significant Elm Avenue on Linlithgow Avenue on both the eastern and western sides of the avenue and a number of significant individual specimens.



Figure 2 Total trees expected to be impacted upon within the MMRP tunnel buffer zone

Furthermore:

- This area includes a section of the Tan on the eastern side, which could mean permanent loss of the ability to plant shady trees along the circumference of the Tan. This alignment as it runs horizontally past the Toms Block area is at odds with the current visual and landscape character.
- To create an optimum ground surface condition, adjacent areas may need to be brought into the overall design, thereby increasing the overall potential area that may be impacted.
- The identified aesthetic, heritage and cultural values of the space would be substantially compromised.
- The Parkland Impact Assessment rates the estimated impact as ‘moderate’ – this being the highest impact rating for any of the parkland areas of the MMRP. This further anticipates that the site will be ‘remediated’ rather than ‘reinstated’, which is understood to confirm that the environmental assets, character and layout of the space will change.

The alternative tunnel location underneath the CityLink tunnels would remove the potential for substantial loss or damage of trees within this portion of the VHR listed Domain Parklands.

5.2.3 Location of Emergency Access Shaft – discussion

Concept Design for EAS on Linlithgow Avenue/Queen Victoria Gardens:

The Concept Design for locating an EAS on Linlithgow Avenue will have significant impacts on Queen Victoria Gardens. The proposed location is considered to be intrusive on the visual amenity of the Floral Clock and Edward 7th Memorial and views of the Lady Janet Clarke Rotunda. This location at the intersection of Linlithgow Avenue and St Kilda Road is a main entrance into the Domain Parklands for pedestrians, and in particular, the low grades at this make this an important entry point for entry by the elderly and people with special needs.

The Aug 16 Review identifies that the prospective impact in this location for the EAS would result in the loss of 5 trees with an amenity value of \$81,451.

Location	No. trees that will be impacted as reviewed by CoM	Amenity value of trees identified in assessment by CoM	Additional trees that may be impacted due to works
Queen Victoria Gardens – EAS	5	\$81,451.09	0

While this is not a large number of trees that would require removal for the proposed EAS in this location (four MLTV trees of five in total, with potential temporary relocation and reinstatement of two mature palms).

Furthermore:

- This would result in an inconsistent tree avenue (i.e. with trees of varying age and height) along Linlithgow Avenue north of the proposed EAS.

Alternative Design Option for EAS in Toms Block:

The Alternative Design Option for the siting of an EAS in Toms Block will have significant impact on this integral component of the Domain Parklands. This intervention will result in a permanent above ground structure, with a resulting loss of 14 trees (of which six are MLTV) with an amenity value of \$182,383. Several of these trees may already require removal due to ground stabilisation works over the shallow tunnel. Permanent access requirements to the EAS from Linlithgow Avenue would also potentially limit the ability for long-term re-establishment of one tree along the road frontage.²⁴

Location	No. trees that will be impacted as reviewed by CoM	Amenity value of trees identified in assessment by CoM	Additional trees that may be impacted due to works
Tom's Block – EAS	14	\$182,382.62	0

The road surface along Linlithgow would be a more suitable area for this object and would be less visually intrusive. The EES CoM submission states that: 'Locations adjacent or in existing roads are preferred as they reduce the need for hardstand. Options might include a location in Toms Block closer to Linlithgow Avenue, rather than in the centre of the park, or within the road reserve itself. Given this section of Linlithgow Avenue may have to close were ground treatment activities required, it would make sense to limit the entirety of the Metro works here to the same general area.'

It will be critical that the MMRA and CoM review this design option to reach a successful siting for the EAS in this vicinity to achieve a good long-term outcome for the Domain Parklands.

5.3 Deficiencies

Ground stabilisation in the EES is primarily focused on existing buildings, structures and underground services. Impacts on landscape and natural ground is not considered in the list.

The ESS does not evaluate the impacts or benefits of the two options: passing over or under the CityLink tunnel but it is apparent that the below tunnel option will have a significantly lesser impact on the parklands, will not require loss of trees, and will not require extensive ground treatment.

- In the discussion of the ‘under’ or ‘over’ CityLink options in the MMRP EES the management of the impact on the CityLink tunnel is estimated to be about the same, however the big difference is that at (9.3.3) [ref?] no ground improvement works would be required if the MMRP tunnel goes under CityLink.
- Ground treatment is taken to mean the injection of grouting and other engineering interventions to stabilise the tunnel. Given the Tunnel will be shallow to the surface, the outcome on the ground is of concern, and this is not well resolved in the EES.

5.4 Conclusion

This is a huge impact in a park which is classified as a Capital City Open space, and has significant landscape, heritage and environmental values.

An additional Performance Requirement is that in parks and open spaces the tunnel design must be able to provide the same conditions at ground level as currently exist to enable maximum re-instatement potential.

6. Domain Station Precinct

This section specifically addresses the issues and impacts on trees and open space posed by the proposed:

- ‘Concept Design’ for the Domain Tunnel Boring Machine (TBM) Southern Launch Site; and
- Construction work sites for the Domain Station Precinct.

6.1 Issues

The St Kilda Road boulevard is comprised of Plane trees within the central median and an outer row of Elms to either side of the road reserve. The road profile is divided down the centre between two local government areas: the CoM (east side) and the City of Port Phillip (west side).

Under the proposed alignment for the rail tunnel, a substantial number of trees would require removal from St Kilda Road and the Albert Road Reserve to facilitate construction of the station box, tram and traffic diversions and for a construction area within the road reserve. Trees would also need to be removed from the south-west corner of the Shrine of Remembrance Reserve for the station entry, and for vehicular access to Edmund Herring Oval – a portion of which lies within the curtilage of the Shrine of Remembrance Reserve.

The Aug 16 Review identifies that prospective removal of trees in this precinct is as follows:

Location	No. trees that will be impacted as reviewed by CoM	Amenity value of trees identified in assessment by CoM	Additional trees that may be impacted due to works
St Kilda Rd works north of Domain Rd and impacts to Kings Domain	39	\$ 694,150.68	0
Edmund Herring Oval – Option 1 [*]	2	\$ 217,204.13	0
Edmund Herring Oval – Option 2 [*]	2	\$ 796.16	0

^{*} Option one involves the removal of two mature Elms

^{*} Option two involves the removal of three young Kauri

Along the St Kilda Road alignment, 39 trees with an amenity value of \$694,151 are established to be impacted.

A total of 223 trees would potentially require removal, with 134 identified as MLTV trees. Removal of these trees from a 700m long section of St Kilda Road as well as associated removals from the Albert Road Reserve would have a significant impact on this section of the south city approach, egress and views via St Kilda Road, creating a large (albeit temporary) gap in a prominent Melbourne boulevard. The proposed tram platform would likely prevent the replanting of up to 12 Plane trees in the central median. However, potential changes to the road layout would allow for new trees to be established immediately north of the Domain intersection (at the existing gap in the St Kilda Road plantation) with minimal net long-term loss of canopy cover within the precinct.

EES CoM submission states the following:

- The siting, design and scale of the proposed entry needs to be modified to reflect projected use and to reduce adverse visual impacts. This might be achieved by co-location of structures and siting the entrance further to the east on Domain Road.
- The EPRs should be modified and additional EPRs may be required to ensure appropriate management of impacts of relocation strategy of users of Edmund Herring Oval.
- A large number of tree removals are proposed over both the CoM and the City of Port Philip. The EES proposal appears to be at odds with the EPRs which seek to avoid tree removals wherever possible. The CoM wishes to work with the MMRA and contractors to reduce number of tree removals in construction area where possible.
- A few of these trees are near Edmund Herring Oval and at the Shrine near MacRobertson Fountain. We think the Station entrance here is overblown for the site and is possibly meaning more trees are being removed than is strictly required.]

6.2 Conclusion

The project ultimately provides an opportunity to advance a St Kilda Road Master Plan in collaboration with the CoPP, MMRA and relevant authorities and stakeholders.

7. Parkville Station Precinct

7.1 Issues

The Parkville Precinct is potentially requires a high number of tree removals. Approximately 106 trees would be required to be removed under the Concept Design. The majority of the removals required are in the northern section of University Square and are made up of approximately 57 small Malus species and 17 other trees. The large number of these small trees located within the Square can be seen in the aerial image below. The proposed removals in the University Square location would be in line with future CoM planned works and are of low concern.

The trees in this precinct are consist of Large elms of late 19th and early 20th century origin that form avenues within the Royal Parade and Grattan Street road reserves. Modestly scaled and recently planted groups of crabapples (*Malus* sp.) and cedars (*Cedrus atlantica*) are planted within the contemporary landscape of the northern portion of University Square, and developing horse chestnuts (*Aesculus hippocastanum*) in the central median of Barry Street. The elms located within the entire width of the Royal Parade road reserve are included with the Victorian Heritage Register (VHR) listed H2198 and are specifically mentioned in the statement of significance for the place.

Construction of the station box and associated entries would require the removal of 22 trees within the Grattan Street road reserve between Royal Parade and Leicester Street, nine of which are large elms identified as MLTV trees. Ten elms would also require removal from the VHR listed Royal Parade immediately north and south of the Grattan Street intersection, though only two of these are MLTV trees. Six of these trees require removal to accommodate changes to the road functional layout of Royal Parade. The total removal of trees from a 250 m section of Grattan Street and additional trees from Royal Parade would have a significant impact on the precinct streetscape.

The Aug 16 Review identifies that prospective removal of trees in this precinct is as follows:

Location	No. trees that will be impacted as reviewed by CoM	Amenity value of trees identified in assessment by CoM	Additional trees that may be impacted due to works
Royal parade	10	\$885,449.02	0
Grattan Street	23	\$666,215.22	0

Thirty nine trees within the southern boundary of the University of Melbourne (all but one are MLTV trees) and 73 trees in total in the northern end of University Square above the underground car park and Barry Street road reserve would also require removal.

The EPRs seek to avoid tree removals where ever possible. One hundred and six trees are proposed to be removed in this precinct, which includes:

- approximately 74 trees removed within University Square
- 10 elms to be removed in Royal Parade
- 24 mature trees in Grattan Street.

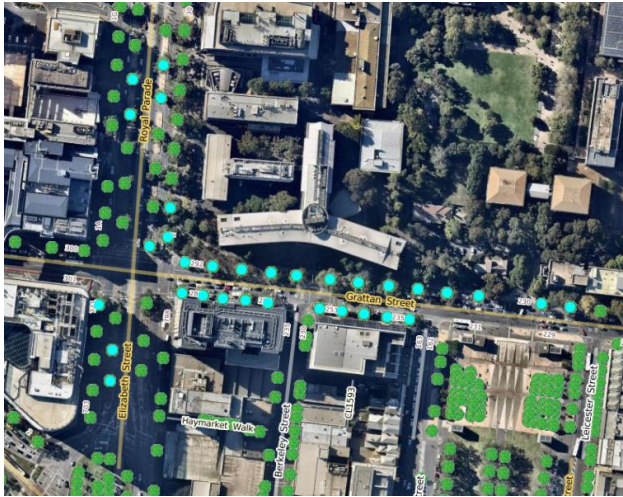


Figure 3 Trees expected to be impacted upon in the Parkville Station precinct

It is noted that the proposed tree removals in the University Square location would be in line with future CoM planned works and are of low concern.

Under the MMRP EES Section 8: Parkville Station Precinct it is noted that :

Approximately 106 trees would be required to be removed under the Concept Design. The majority of the removals required are in the northern section of University Square and are made up of approximately 57 small Malus species and 17 other trees. The large number of these small trees located within the Square can be seen in the aerial image below. The proposed removals in the University Square location would be in line with future CoM planned works and are of low concern.

The most significant impact is the removal of 10 Royal Parade elms shown in the Concept Plan. It is submitted that during the final planning stage every option must be exhausted to ensure the minimum amount of trees would require removal. These trees fall within land that is included on the Victorian Heritage Register. Heritage Victoria has been contributing to the Technical Reference Group.

The impacts on these elm trees is acknowledged in the EES and is addressed through the following specific EPR:

CH12 – To the satisfaction of Heritage Victoria and the responsible authority, replace removed elm trees in Royal Parade as part of project delivery using appropriate species and re-establish the boulevard formation.

Provide suitable soil conditions to facilitate the growth of new trees to reach the size of the existing mature trees in the boulevard.

The EPRs could perhaps benefit from ensure a requirement to ensure that final designs are considered that firstly minimise the loss of and effect on these elms.

The EPRs also include an outcome that seeks to ensure that the detailed design of the project minimises the need to remove trees. The CoM wishes to continue to work with the MMRA on the detailed design of the project to minimise this impact. Where trees are required to be removed, the proposed Environmental Performance Requirements are consistent with CoM policy.

Approximately 106 trees would be required to be removed under the Concept Design. The majority of the removals required are in the northern section of University Square and are made up of

approximately 57 small Malus species and 17 other trees. The large number of these small trees located within the Square can be seen in the aerial image below. The proposed removals in the University Square location would be in line with future CoM planned works and are of low concern.

A partial occupation of the area would also allow for the potential delivery of some early stages of the adopted master plan.

The EES Concept Plan shows tunnel and station infrastructure to be located within the Barry Street road reserve and along the south side of Grattan Street within the footpath area. The location of these structures is inconsistent with design objectives seeking to provide visual and physical connectivity across Grattan Street and a potential landscaped promenade treatment to Barry Street.

I understand that the CoM wishes to continue to work with the MMRA to develop the design of the project to provide for the potential temporary occupation of a portion of University Square and to ensure that the location and design of structures is consistent with any adopted master plan for University Square. The proposed Environmental Performance Requirements allow for this to occur and are in my view supported.

8. Other MMRP Precincts

8.1 Summary of Key Issues

There are a number of CoM trees in the public realm in other locations that will be impacted by the MMRP.

Consistent with CoM policy and strategy and as articulated in the EPRs AR1-AR5 (including the suggested amendments in this submission), minimisation of tree loss, protection of existing trees, and replanting to achieve greater urban forest benefits, is of paramount importance.

9. Declaration

I have made all the inquiries that I believe are desirable and appropriate and no matters of significance which I regard as relevant have to my knowledge been withheld from the Inquiry and Advisory Committee.

A handwritten signature in black ink, appearing to be 'Ia PL' followed by a long horizontal stroke.

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hunt & hunt
lawyers

28 July 2016

Ian Shears
Manager Urban Sustainability
c/- City of Melbourne
90-120 Swanston Street
Melbourne VIC 3000

Our ref: TXR1/NXS
Matter no: 9613710

By email: ian.shears@melbourne.vic.gov.au

Dear Mr Shears

**Melbourne Metro Rail Project
Environment Effects Statement Inquiry
Instructions for expert evidence**

We are assisting the City of Melbourne (CoM) finalise its submission to the Inquiry on the Environment Effects Statement (EES) and the Advisory Committee for the Planning Scheme Amendment (PSA), both in respect of the Melbourne Metro Rail Project.

Thank you for agreeing to prepare and present expert evidence at the joint Inquiry and Advisory Committee for CoM.

What is your evidence about?

CoM requires that you prepare and present expert evidence in relation to consideration of the arboriculture, parks and open space impacts associated with:

- removal of trees and mitigation measures;
- permanent loss of planting sites; and
- sites of significance such as JJ Holland Park, Federation Square and the Melbourne Visitor Centre, sections of Alexandra Gardens, Queen Victoria Gardens and Kings Domain Gardens.

Timeline

The public hearing of the Inquiry will commence on 22 August 2016, running for approximately six weeks. You will be advised of the venue and the time that you will be required to attend the hearing in order to present your evidence, as soon as CoM receive the indicative timetable.

Any expert evidence to be presented at the Inquiry requires the submission of a detailed written report by **12 August 2016**.

CoM currently expects to call approximately 12 experts in 10 different fields (with 9 CoM employees giving evidence). With the tight timeframes for preparation and submission of the evidence, this process requires considerable internal coordination to ensure that the legal team has sufficient time to review and comment on all evidence reports before finalisation and submission.

To assist in this process of finalising the evidence reports, we ask you to have your draft evidence report ready for review by **5pm 8 August 2016** and to be available in the following days to finalise your report. Smaller reports are required to be ready first as the larger reports will require more time to prepare.

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INTERLAW.

Your draft report should be emailed in Word format to Karen Snyders Karen.Snyders@melbourne.vic.gov.au and Nick Sissons nsissons@huntvic.com.au as soon as it is ready for review.

Please be assured that you have the support from the CoM Directors and Managers for you to dedicate your time to this process without delay so that a unified approach is presented from the CoM by having all expert evidence reports ready on time.

What is required?

We understand that this may be first time that you are being required to present expert evidence to an Inquiry or Advisory Committee. To assist you in preparing your evidence report we suggest that you review the Planning Panel Victoria's Guide to Expert Evidence (http://www.dtpli.vic.gov.au/_data/assets/word_doc/0017/231263/G2-Guide-to-Expert-Evidence-April-2015.DOCX). This guide provides useful information to assist in preparing evidence reports. Other useful guides from Planning Panels Victoria about the general process are also available online (<http://www.dtpli.vic.gov.au/planning/panels-and-committees/planning-panel-guides>).

Please note that whilst you are employed by the CoM, you are being asked to present expert evidence as a professional with suitable experience and qualifications in your field. This means that you must present your professional opinion on the matters that have been advanced by the CoM in its submission on the EES and PSA. You must also ensure that you comment only on matters that are within your field of expertise and matters that are within the EES and PSA. You can reference any existing publicly available material, reports, studies or policy as support or justification for your opinions but you must not reference any confidential information of the CoM.

The joint Inquiry and Advisory Committee requires that CoM provide it with copies of any referenced materials in any expert evidence statements. Accordingly, please provide a copy or external web link to any reports, studies or policy that you have referenced so that we can compile a complete list of reference materials for submission to the joint Inquiry and Advisory Committee.

We also understand that you may have been involved in other aspects of this project whilst performing your role at CoM and you may have previously worked directly with the 'CoM and Melbourne Metro Rail Authority' working group. As part of your evidence that you are being asked to prepare, you are not required to comment on any information, designs or other discussions that are not specifically included within the EES or PSA and CoM submission. Of course, when discussing alternative options or deficiencies, it may be a matter of professional opinion if you believe that the EES or PSA has left out other relevant considerations that should be raised for consideration.

Generally, you have a duty to the joint Inquiry and Advisory Committee to ensure that your report complies with the content and form requirements of Planning Panel Victoria's Guide to Expert Evidence.

Consistency of format for CoM staff expert evidence reports

You should have regard to the CoM submission on the EES and PSA. We ask that you structure your expert evidence in a manner that uses or aligns with the following precincts or subject areas where possible:

1. Fawkner Park and the Domain.
2. Tunnel Alignment and Emergency Access.

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3. Western Portal (Kensington).
4. Arden Station Precinct.
5. Parkville Station Precinct.
6. CBD North Station Precinct.
7. CBD South Station Precinct.
8. Domain Station Precinct.
9. Noise and Vibration.
10. Planning Scheme Amendment.

Within any given precinct, we ask you to provide an opinion on any relevant options, issues or deficiencies that have been raised in the CoM submission. If you intend to stray from the substance of the CoM submission, please only do so after confirming this with Karen or myself.

There may also be an obligation on witnesses to attend a conclave of like-minded experts in order to help draft a statement setting out where the respective witnesses agree and disagree. We will provide you with further information about this as it comes to hand.

This approach will ensure consistency in the CoM evidence and enable Council's legal advocates to focus on a precinct by precinct basis in presentation of the CoM submissions during the Inquiry. It will also assist Council's legal advisors determining if aspects of your evidence has been addressed by other submitters.

We have provided you with an example word template document that can be used to assist you in drafting your expert evidence if you require. However, this is not intended as a one size fits all and you should structure your statement in any manner that assists in providing a clear and concise opinion on the points raised in the CoM Submission.

Presentation to joint Inquiry and Advisory Committee

Generally it should be assumed that the joint Inquiry and Advisory Committee members and all other participants have read your statement.

CoM will be strictly limited in its time allocated to present its submission to the joint Inquiry and Advisory Committee.

Accordingly, we ask that you prepare a short 20 minute presentation of the key issues in your statement. If you believe that you need more than this time please see us as soon possible so that we can discuss requirements with you directly. You may wish to use an example to highlight any particular concerns. You will also be asked questions, so please keep your presentation short and concise.

If you intend to use PowerPoint to present your key points at the hearing, please discuss this with us. Any PowerPoint presentation you wish to use must be finalised at the same time as your draft statement of evidence as it will need to be submitted with your statement of evidence.

You should attend the hearing with your statement and all copies of any reference material that you have referenced. All documents will need to be tendered electronically in advance of the hearing.

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Further information


You will find links to the documents of the EES and PSA as follows:

EES - <http://metro.tunnel.vic.gov.au/ees>

PSA - <http://metro.tunnel.vic.gov.au/ees/planning-scheme-amendment>

Please do not hesitate to contact Karen Snyders Karen.Snyders@melbourne.vic.gov.au or Nick Sissons nsissons@huntvic.com.au if you require any further information about this process.

Yours faithfully
Hunt & Hunt



Nick Sissons
Associate

Contact:
Nick Sissons
D +61 3 8602 9357
E nsissons@huntvic.com.au

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Endnotes:

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- ¹ Arboriculture Impact Statement, Melbourne Metro Rail Project, John Patrick P/L (2016) [EES App.R] pp.vi-x
 - ² City of Melbourne Open Space Strategy (2012) [OSS] p.6
 - ³ Refer vhd.heritagecouncil.vic.gov.au/places/165951
 - ⁴ OSS, p.6
 - ⁵ Assessment of Cultural Heritage and Executive Director Recommendation to the Heritage Council, May 2016; vhd.heritagecouncil.vic.gov.au/places/198656
 - ⁶ J C Schwab (ed.) Planning the Urban Forest (2009)
 - ⁷ EES App.B
 - ⁸ EES App.R p.19 and risk assessment methodology overview, pp.12-14
 - ⁹ EES App.R p.15
 - ¹⁰ EES App.R p.19
 - ¹¹ City of Melbourne Fawkner Park Master Plan (2006) [FPMP] pp.3 & 8
 - ¹² Fawkner Park User Study (IOSS, 2016) p.12
 - ¹³ FPMP
 - ¹⁴ EES, CoM submission p.32
 - ¹⁵ Victorian Heritage Database place details - The Domain Parklands
 - ¹⁶ Domain Parklands Conservation Management Plan (Context, 2016) [DPCMP], Vol.1, p.2
 - ¹⁷ Domain Parklands Master Plan Discussion Paper, 2016
 - ¹⁸ DPCMP, Vols.1-5
 - ¹⁹ EES Chapter 16 p.28
 - ²⁰ Melbourne Metro Rail Project, Environmental Effects Statement [MMRP EES], Chapter 16 Landscape and Visual pp.22-23
 - ²¹ EES, CoM submission p.27
 - ²² EES App.P Table 19-7, p.28
 - ²³ EES App.P pp.53-54
 - ²⁴ EES App.R p.vii