

NELP Tram to Springvale Urban Design Landscape Plan

Manningham Submission



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Executive Summary

Manningham Council (Council) has been involved as a key stakeholder for the North East Link Project (NELP) since 2019 when the project received initial approval to commence via the Environmental Effects Statement (EES) process.

The North East Link Project Incorporated Document (December 2019, amended September 2023) provides the high-level planning approval for the project. The Incorporated Document was gazetted into relevant Planning Schemes via Schedule 12 to the Specific Controls Overlay (SCO12).

Clause 4.5 of the Incorporated Document requires the preparation of an Environmental Management Framework, which includes a set of Environmental Performance Requirements (EPRs) with which the project must comply. Clause 4.8 requires the preparation of an Urban Design Strategy (UDS), which the project must be carried out in accordance with.

Clause 4.9 of the Incorporated Document relates to Urban Design Landscape Plans (UDLP). Prior to the commencement of development of permanent above-ground buildings or structures, a UDLP must be prepared to the satisfaction of the Minister for Planning. The UDLP must show the final built form design for the project, must be accompanied by relevant supporting plans and documents, and must be subject to consultation with relevant stakeholders and the public before being submitted to the Minister for assessment.

Pursuant to Clause 4.9.9 of the Incorporated Document, the use and development of the project must be carried out generally in accordance with the approved UDLPs.

Council has prepared and lodged submissions to four exhibited UDLPs to-date – for the Bulleen Park and Ride redevelopment, Central Tunnels package, the Eastern Freeway Upgrades (south package), and Doncaster Park and Ride redevelopment.

A UDLP for the Eastern Freeway upgrades between Tram and Springvale Roads is now on public exhibition in advance of being submitted to the Minister for Planning for assessment. Exhibition commenced 1 September 2025 and will conclude on 21 September 2025.

This submission is Council's response to the exhibited UDLP, for consideration by NELP and the Minister for Planning.

Council's position is that the UDLP is generally acceptable in its current form, subject to implementation of the recommendations outlined by this submission.



Introduction

- 1. This submission has been prepared on behalf of Manningham Council (Council) in relation to the public exhibition of the proposed UDLP for the Eastern Freeway upgrades between Tram and Springvale Roads, which will be delivered as part of NELP.
- 2. The UDLP contains designs for the widening of the freeway, associated noise walls, major arterial road interchanges, walking and cycling connections, indicative tree removals, landscaping outcomes, and urban design interventions.
- 3. The UDLP applies to land within and immediately adjacent to the existing Eastern Freeway road reserve between Tram Road and Springvale Road.
- 4. Council acknowledges the consultations that have occurred with Council officers and other relevant stakeholders that have informed the preparation of the UDLP and now welcomes the opportunity to provide feedback on the exhibited version.
- 5. Council generally supports the UDLP, and notes that the designs generally accord with or improve on the details presented in the initial reference design for the project exhibited in 2019 via the Environmental Effects Statement (EES).
- 6. To work towards a net-community benefit for Manningham's community as a result of the project, this submission identifies various matters in the UDLP for attention by the North East Link Program (NELP).
- 7. It is expected that appropriate consideration be given not only to Council's submission, but also to any other submissions lodged by the Manningham community, and that NELP's response to all submissions will be clearly communicated prior to (or by) the final UDLP.
- 8. This submission reiterates Council's strong and ongoing advocacy to ensure that no net loss of open space results from the project, that active transport connectivity is maintained and improved, that environmental considerations are prioritised and that noise walls meet the expectations of our community to protect amenity.

Submission

Net-community benefit

- 9. We expect all project packages to achieve a net-community benefit in response to the significant impacts created by the project. Considering the extent of impacts to the community during construction, the final outcomes of the project must achieve benefits above and beyond standard outcomes for a road infrastructure project.
- Accordingly, where there are opportunities to provide additional interventions or upgrades to the benefit of the community who have been impacted by the project, they must be explored - even if outside the project boundary.
- 11. Council continues to support all initiatives by NELP that provide financial support to the community, such as the North East Community Fund. We stress the importance of these



- initiatives not only continuing, but being expanded as impacts to the community from the project evolve and progress.
- 12. We also seek that the final design in the UDLP be subject to a rigorous assessment with the diversity of our community in mind. This will include applying a gender and intersectionality lens to ensure all aspects of the design consider an appropriate range of diverse needs.

Open Space

- 13. We continue to seek no net loss of open space as a result of the project which requires minimising the project footprint and its associated impacts to the greatest extent possible, as well as unlocking new/additional areas for public open space.
- 14. We also seek transparency on exactly how much public open space is being taken up by this UDLP package, given our ongoing stance for no net loss across the entire project. Providing transparency is a key part of building trust between the project and important stakeholders including local residents and Council.
- 15. Key locations of focus for this UDLP include the land between the Eastern Freeway and residential properties on the west side of Tram Road, and in the vicinity of Tram Reserve and Eram Park. Detailed explanations on how the project footprint has been minimised in these locations must be provided, as well as for other constrained locations.
- 16. There is also an opportunity for upgrades to be considered at Boronia Reserve which is adjacent to the project boundary and will see impacts during construction. Boronia Reserve is an important local sports and recreation destination with an oval, sports pavilion, car park and hall surrounded by mature vegetation, including some remnant native vegetation. It is identified in the Koonung Creek Linear Park Management Plan 2011 and was again called out in an issues and opportunities paper in 2018, which was prepared in response to NELP.
- 17. Boronia Reserve is a key location where improvements to achieve a net-community benefit could be targeted. We seek collaboration with Council by the project in progressing improvements in this location that have been delayed as a result of project works, which has had financial implications for Council. Additional upgrades of landscaping, parking and connecting paths must also be considered, to give back to the local community who have been impacted.

Urban Design

- 18. The hierarchy of 'nodes' should be revisited in relation to underpasses (designated as 'secondary nodes'), which require a similar level of intervention to the 'primary nodes' in our view. Maximising feelings of safety and comfort at underpass locations is a key priority for Council, and these locations generally require higher level of interventions to achieve this given their physical layout and sense of confinement.
- 19. It is noted the UDLP defers specific decisions on anti-graffiti treatments to a later design stage, but has used textured materials, purposeful placement of landscaping, and activation of key spaces (e.g. under bridges) to contribute to anti-graffiti outcomes. This is commended, and Council encourages an ongoing focus on this issue to minimise future maintenance costs and maximise public amenity outcomes. Additionally, we seek to



- understand how graffiti management will be undertaken for existing retained noise walls which have varying materials.
- 20. From an urban design perspective, Council has a strong preference for concrete surfaces to not be painted, especially for large structures such as bridges. Painting of concrete is subject to flaking, increased maintenance, and may attract vandalism. Where a coloured outcome is sought, the colour must be integrated into the concrete itself.
- 21. Greater details of the proposed 'vertical greening to community side of noise walls' is required to ensure an appropriate outcome is achieved. The concept of softening these interfaces to minimise visual impacts is supported, however there is minimal details on how achievable this outcome will be.
- 22. Lighting at the primary node north of the Cabena Street pedestrian and cycling bridge must be reconsidered. As there is no lighting apparent in the surrounding extents, it may cause visitors to the node to be 'blinded' to their wider surrounds that are not illuminated. All nodes should be reviewed to ensure this potential issue is addressed throughout all locations in UDLP, with safety and crime prevention as the foremost consideration.
- 23. Feature lighting should be considered for bridges, which could have the ability to change colour for variety and as required for important events or commemorations. Any feature lighting must be collaboratively designed with the future asset owner to ensure future maintenance requirements are manageable.

Active Transport Connectivity and Safety

- 24. Council seeks that all opportunities to prioritise active transport connectivity and safety through this UDLP must be maximised.
- 25. Provision of walking and cycling infrastructure to promote and improve higher use of active transport modes is a strategic goal of Council. We are currently preparing a new Active Transport Strategy which will identify the Koonung Creek Trail and its connections as an integral existing active transport link to be maintained and improved.
- 26. Council supports the efforts shown in the UDLP to provide new and upgraded pathways including dedicated Shared User Paths (SUP) within the project boundary.
- 27. Council recommends that any retained pedestrian and cycling paths within the project boundary be upgraded to provide seamless connections to new SUP's, and to meet the prescribed best practice standards. This includes the full extent of the Koonung Creek trail on both sides of the freeway.
- 28. Consideration must be given to the expectation created by lighting some sections of paths. Some users may assume that the full length of a path will be lit if they enter at an illuminated location. This may lead to users being caught off guard or having a poor experience using the network, and should be addressed by the design if possible.
- 29. The hierarchy of paths at the connection between the Koonung Creek Pedestrian and Cycling bridge and the trail to the north and east. The primary path should run east-west in line with the bridge, and the path from the north should tee in.



- 30. Council seeks clarity on whether stairs were considered in addition to the ramp access for the Eram Road pedestrian and cycling bridge, on the north side of the freeway. Stairs would provide an alternative choice for users and could provide more direct access from the western side of Eram Park, up to the bridge.
- 31. Additionally, this could connect to a new path link to the existing Koonung Creek Trail to the north, south of Larkspur Avenue. This is an existing informal connection that is expected to see higher use following the proposed relocation of the Eram Road pedestrian and cycling bridge per the UDLP. This would also assist users connecting into the Koonung Creek Trail to cross the freeway from Church Street and Windella Quadrant journey which will be lengthened by the relocated bridge.
- 32. Maximising connectivity and easy access to the relocated bridge is of significant importance due to nearby schools either side of the freeway which may have students using the bridge for access daily.
- 33. Council requests the provision of a formal pathway from the Koonung Creek trail up to the playground at the east end of Boronia Reserve which is currently connected via an informal 'goat track'. This would be a key opportunity to provide benefit to the local community who will be significantly impacted during project works.
- 34. Another key opportunity to provide an elevated outcome to achieve a net-community benefit is at Tram Road Reserve, where Council has received previous community requests for a bridge crossing the Koonung Koonung into Eram Park. This connection will be all the more useful in conjunction with the newly located Eram Road pedestrian and cycling bridge over the freeway as shown in the UDLP. This additional access point will enable easier movements for users accessing the new Eram Road bridge from the west, and is an important link considering there is no underpass proposed under Tram Road on the north side of the freeway. Providing an additional crossing over the Koonung Creek was identified as an opportunity during the EES, and became part of the approved Urban Design Strategy (UDS) in 2020.



*Consider improving the ability for pedestrians to cross Koonung Creek to access underutilised open space within Eram Park.

Figure 1 – excerpt of NELP UDS (p. 77)

- 35. Design and layout of primary nodes should consider provision of retreat areas for bicycles, prams, walking aids, and other similar items for users who may stop and linger at these locations.
- 36. Placement of landscaping must include consideration of view lines both at the time of planting, as well as once the plants are mature. This is also a key consideration for future maintenance. Locations where view lines may be impacted by landscaping include the Cabena Street pedestrian and cycling bridge primary navigation nodes.
- 37. Wayfinding signage including distances should be considered for sections of path where there is a lengthy stretch between exit points. Signs indicating the distance to the nearest junction/exit would assist feelings of safety and comfort. Solar lighting should be considered to ensure any such signs are visible at nighttime.



38. Indication of amenities at primary nodes and other key locations should be shown in the UDLP. This may include water fountains, bicycle repair stations and other features that path users may require.

Amenity

- 39. We seek to protect the amenity of the community at all project stages.
- 40. Protecting the amenity of our residents continues to be an immensely important priority. This relates not only to the amenity and suitability of the permanent project works as shown in the UDLP, but also the amenity impacts felt by the community during construction (e.g. noise, dust, air quality). Council will continue to work with and advocate to the project to ensure all amenity considerations are given adequate priority.
- 41. As the UDLP provides designs only for the permanent works, we note the potential for these plans to distract or confuse community members, who may not be able to envisage the extent of construction works required to achieve the UDLP outcomes. We therefore stress the significant importance of meaningful engagement with the local community, to explain not only the outcomes of the UDLP but also the extent of disruptions and construction impacts they should expect in the meantime while the works are ongoing.
- 42. Council's position is that all truck and other vehicle access associated with the works must be provided from the freeway, with access via local roads avoided at all costs.
- 43. In finalising the lighting design for this section of the project (including freeway lighting), protecting nearby residents from light spill into their homes and private spaces must be given the utmost consideration.
- 44. Council continues to seek assurance that the project maintains compliance with all Environmental Performance Requirements. This includes noise management and monitoring during construction and following completion of the project, to protect the amenity of Manningham's community.

Future proofing

- 45. Understanding how the project is future-proofed is a key priority for Council, to ensure our community is receiving the greatest value possible for the long term, and to ensure evolving community needs can continue to be met. This is also important for handover of any assets back to Council for ownership and maintenance.
- 46. Noting that ultimate ownership and maintenance responsibilities are not specified in the UDLP and will likely be determined at a later stage it is still important to consider at this early design stage.
- 47. The design of all permanent works including the proposed 'nodes' within the UDLP must have strong regard to the capacity of the ultimate asset owner to maintain them. Further information on the maintenance considerations of lighting, materials, plants and other interventions should be included in the UDLP to demonstrate how this was considered in the design process.



- 48. Council queries the plastic material proposed for noise walls in relation to ease of replacement for damaged panels, and whether access for vehicles will be required to undertake noise wall maintenance. If vehicle access is required, we query how the road and path alignment, and the placement of landscaping, will allow for this in all locations.
- 49. Also in relation to the plastic noise wall material, we query whether there are other examples of this material being used and what level of success it has had in the past. The lightweight nature of the material raises question in relation to durability and ability to withstand wind.
- 50. Council seeks details on the details of traffic investigations that determined key decisions on final road layouts including the outbound exit ramp at Blackburn Road, which is proposed as one lane despite observed increasing traffic congestion in this location.
- 51. Proper maintenance and cleaning of acrylic noise wall panels will be integral to ensuring the overshadowing outcomes per the UDLP diagrams are accurate. Council seeks to ensure a cleaning and maintenance plan is developed with the relevant asset owner.
- 52. Proposed bridges within parkland maintained by Council will require load limits that enable vehicle use, which may need to be considered at this early design stage as relevant.
- 53. The design is not explicit on future ownership and maintenance of Water Sensitive Urban Design features. The ultimate asset owner must have input at this early design stage to ensure an outcome that can be properly maintained.

Local contexts and knowledge

- 54. Appreciating that the project is enormous in scale, we continue to promote and inform NELP about local projects and contexts that require consideration no matter how small.
- 55. We seek to ensure that NELP is well-informed by local knowledge, to achieve outcomes that are specifically considerate of our community. We would like to see a clearer commitment to this collaboration with local Councils within the UDLP report.

Environmental impacts

- We continue to seek transparency and accountability from the project on all environmental processes and management.
- 57. We seek ecologically and culturally sensitive design responses for any works impacting waterways such as the Koonung Creek, including a commitment to no further undergrounding of the creek. Despite statements in the UDLP that the creek will not be undergrounded, this outcome is not clearly discernable on the plans and Council has concerns about what is, or isn't, considered 'undergrounded'. We request that the UDLP documents be updated to provide greater clarity on this outcome, in an accessible and transparent manner. Statements relating to realigning the creek must also be clarified to demonstrate no unacceptable environmental or other impacts.
- 58. We also seek that local flora and fauna impacts be a key consideration for all stages of the project from planning and design (e.g. of noise walls) through to construction (e.g. during tree removals).



- 59. Council seeks that the following principles be considered and implemented across the project for both natural areas and for all landscaping, to both replace lost habitat from the project and to improve biodiversity outcomes:
 - All plantings and species used in landscaping and natural areas for the project should only be local provenance indigenous species suitable to the Ecological Vegetation Class (EVC) in the site / area, or at a minimum only local provenance indigenous species should be used.
 - Plantings should not consist of monocultures of only a few species or life-forms, e.g. only trees or only a few species of shrubs. All plantings should have a high level of diversity of species relevant to all life-forms / structure for the relevant vegetation community to that area e.g. high diversity and structure for Canopy and understorey Trees, large, medium and small shrubs, and high diversity and structure in the ground storey life-form / layer including grasses, sedges, lilies, forbs, climbers, ground covers, etc.
 - For areas outside of biodiversity zones, natural areas and natural open spaces, e.g. roadsides or other garden areas prioritise the use of suitable local indigenous species in all landscape planting.
 - Strictly no invasive "native" species or environmental weed species to be used in any landscaping.
 - All plantings sourced should be 'tubestock' from local indigenous nurseries. Where 'larger pot sizes' are planned for some landscaping or roadsides for trees, plants should be grown under contract by a local indigenous nursery.
- 60. Loss of fauna habitat needs to be addressed through creation and supplementation of replacement habitat including:
 - Dense and diverse shrub and ground storey plantings with locally indigenous species for fauna including insects, reptiles, birds, mammals, amphibians, and fish.
 - Use of large variety of key locally indigenous food and habitat plant species for fauna.
 - Nest boxes for a large variety of native fauna (mammals and birds) to replace lost hollows.
 - Recreation / creation of diverse habitat structure in the ground storey for native fauna including use of logs and rocks.
- 61. Acknowledging that greater detail on landscaping layouts, species and maintenance will be finalised at a later design stage, the landscaping designs shown in the UDLP must plan ahead for key considerations. These include enforceable Tree Protection Zone, clearance envelopes for shared trails for planting (and avoidance of planting where plants will grow into clearance envelopes and then require frequent pruning).
- 62. Impacts from lighting must be carefully considered from an environmental perspectives. Proposed lighting should minimise spill into surrounding bushland, and smart lighting used to reduce impact on wildlife and insects. Warm lighting rather than white/blue lighting is also less impactful to sensitive environmental receptors.

Trees and landscape

- 63. Tree removals across the project have caused enormous distress to the community to-date, at the time it occurred, but also ongoing with the daily visual reminders of tree loss.
- 64. We place the upmost importance on maximising tree retention and seek full transparency and accountability from NELP and its contractors on an agreed, documented and effective



- tree removal process with multiple sign off points, to avoid any errors or miscommunications.
- 65. The extent of tree canopy removal shown in the UDLP is highly concerning to Council, particularly the extent of removals proposed outside the widened freeway footprint. All trees on the north side of the freeway near Tram Road are proposed to be removed (or potentially removed), which will have significant visual, amenity and environmental impacts.
- 66. The UDLP must be updated to include more accountable and transparent details on the extent of proposed tree removals, including clearer justification for those occurring outside the freeway footprint.
- 67. Appropriate replacement planting must be provided in consultation with directly impacted stakeholders, including Council. An example location is adjacent to Applewood Retirement Village, where substantial replacement planting will likely be required and must be discussed directly with local stakeholders.

Art, culture and history

- 68. Council sees a great opportunity for a heritage trail / walk along the Koonung Creek, which could be supported by the ongoing co-design process with Wurundjeri. Council is keen to see the outcomes of the co-design process as they progress, and acknowledges the key opportunity for this project package to celebrate the important waterways and other connections to Country in this area.
- 69. Council notes that land within Schedule 181 to Heritage Overlay is located adjacent to the project, to the east of Middleborough Road and north of the Freeway. The site is identified as being a potential archaeological site and should be identified in the UDLP and treated with appropriate sensitivity throughout project works. This site was identified by the Manningham Heritage Study 2006, which notes that Manningham contains a wide range of buildings, structures, monuments, trees, landscapes, and archaeological sites that provide an important sense of historic continuity and a distinctive character. There is no record of the site protected by Schedule 181 being subject to an archaeological investigation to-date.
- 70. Council recommends that NELP explore further opportunities to provide a series of art along the Koonung Creek trail and all interconnected paths, for enjoyment by the community and to support local artists.

Other

- 71. Noting the detailed description provided at section 4.4 of the UDLP report, Council seeks a more accessible explanation of the interface with the 'South Package' UDLP. There remains some confusion about where the currently exhibited package starts, and which UDLP will be the final approved document for the land within this interface zone. We note that the timing of ministerial approvals may assist in this matter being presented with more certainty in the final approved UDLP.
- 72. Through our experience with previous NELP packages, Council is aware that there may be changes to the ultimate design outcomes for this package as it progresses through detailed design and beyond. Noting that these changes must be 'generally in accordance' with the final approved UDLP, we also seek that Council be consulted with on any changes to the design, as a key stakeholder representing the evolving needs of our community.



Conclusion

- 73. Council generally supports the proposed upgrades and changes proposed by the UDLP, and notes the key improvements achieved in the final design as compared to the original 2019 reference design.
- 74. Council respectfully requests that the recommended changes and considerations outlined by this submission be incorporated into the final UDLP.
- 75. Council looks forward to reviewing the final UDLP to understand how all feedback from the exhibition period has been implemented.



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