Use this form to lodge a submission to Heritage Victoria in response to the public notice of a heritage permit under Section 95 of the *Heritage Act 2017*.

Prior to making a submission please read Heritage Victoria's Policy Guideline for Public Notice of Heritage Permit Applications and Submissions Received.

In considering a permit application the Executive Director, Heritage Victoria, considers matters set out under Section 101 of the *Heritage Act 2017* (the Act), which includes all submissions received during the public notice period. Submissions received should relate to the cultural heritage significance of the place or object. Planning matters including amenity, overshadowing of non-heritage properties, noise, traffic and car parking are not matters considered in determining a permit under the Act.

Submit the completed form to Heritage Victoria before midnight on the last date of the public notice period via email at heritage.permits@delwp.vic.gov.au.

**Please note:**

*Submissions received will be treated as a public document and may be provided to persons with an interest in the heritage place or object, including the applicant. This will include your name and contact details.*

*The advertised permit will not be determined during the notice period.*

*All submitters will be notified when the permit application is determined and if any future permit amendment applications are received. Please note that where petitions are received only the submitter will be contacted.*

### 1. Application Details

<table>
<thead>
<tr>
<th>Place or object name:</th>
<th>Moreland Station Reserves including the eastern reserve and western reserve (Gandolfo Gardens)</th>
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<tbody>
<tr>
<td>Address or GPS location:</td>
<td>Moreland Railway Station, Coburg</td>
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<tr>
<td>Victorian Heritage Register number:</td>
<td>VHR H0952- UPFIELD RAILWAY LINE PRECINCT, WILSON AVENUE and VICTORIA STREET BRUNSWICK and CAMERON STREET and VICTORIA STREET- COBURG</td>
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<tr>
<td>Permit Application Number:</td>
<td>P31649</td>
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2. Personal Details

First name: John
Surname: Englart
Business or organisation name: Upfield Corridor Coalition
Climate Action Moreland
Position title: Committee member
Convenor
Address (optional): P.O. Box 381, Fawkner, Vic, 3060
Email address: johnenglart@climateactionmoreland.org
Telephone: 0408 536733

3. Submission Details

Please outline your views about the permit application:

I write in support of the 2019 nomination of extra historical items and Moreland Reserves, including the Gandolfo Gardens, as part of the heritage of the Upfield line, being of substantial local and state historical and cultural significance, and opposing the present application of the Level Crossing Removal Authority for a permit to conduct work as presently specified.

Personal Details:

I have been a resident of Moreland for 29 years. For 18 of those years I lived in Cassels Road near Moreland Station. My children often visited the Gandolfo Gardens and east Moreland reserve on a regular basis as the closest park to where we lived. My family attended the last closure and locking of the Tinning Street rail gates in 1998, including taking photos of the event. I have been an occasional user of Moreland station as a train passenger. For the last seventeen years I have used the Upfield bike path to cycle commute to work, for shopping, and to visit friends. Moving to Fawkner 2010, the Upfield bike path has become an even more important link for my visits to Coburg, Brunswick and into the city for a variety of purposes.

I have been reading and researching climate science and application to policy at all three levels of government since 2004. I am an active member of Climate Action Moreland since 2012. I attended the 2015 UN Climate Change Conference COP21 in Paris in 2015, Marrakech COP22 in 2016, and Bonn COP23 in 2017, as an NGO observer for Climate Action Moreland and the Climate Action Network Australia. One of my areas of special attention has been human adaptation to extreme heat events, and the urban heat island for Moreland. Preservation of established mature tree canopy is very important in this regard.

I am also:

- committee member of the Upfield Corridor Coalition with a community vision for building a better skyrail,
- member of the Upfield Transport Alliance looking to increase the reliability and frequency of the Upfield Line through track duplication and extension,
- Coordinator of the Extend the Upfield Bike Path to Upfield Campaign which engages in advocacy for cyclists in the northern suburbs of Moreland and into Hume municipality.
Comments on LXRP Heritage Impact Statement

I have no problems with removal and off-site storage of the Moreland Signal Box, Signal 35 or the ‘Canoe Tree Memorial’ prior to reinstatement on-site, as long as these are adequately documented, stored and reinstated in a professional manner.

I do object to ‘the removal of 113 trees within the Moreland Station Reserves (comprising 21 trees of high arboricultural value, 20 trees of moderate arboricultural value and 72 trees of low/no arboricultural value)’ and will argue that LXRP have not presented adequate alternatives, including alternative station siting close to Moreland Road, over Moreland Road, or south of Moreland Road to obviate the need for so many trees to be destroyed, including some culturally significant ones. I also argue the economic use document has major flaws.

I agree with the 2019 heritage nomination statement:

“The Upfield Railway Line Precinct is socially significant for its ability to demonstrate a way of life, working environment and functions that are no longer common in Victoria. It is also significant as a focus of local sentiment and as such is socially, economically and geographically important to the Brunswick and Coburg people. This is evident in several campaigns successfully mounted by local interest groups to retain and protect the line, and to lobby and develop unused land along the railway for gardens and recreation purposes for nearby residents living in a densely settled, open space deficient area.”

8. The extent to which the application affects the cultural heritage significance of the place or object (s.101(2)(a) of the Heritage Act)

I note LXRP statement "The two sugar gums identified as being of particular significance in the community-led nomination will be removed. It is noted that they appear to be early plantings, possibly dating from the community planting scheme in the early twentieth century These trees cannot be retained as part of the proposed works."

LXRP fails to provide any rationale for destroying these trees, rather than modifying work practices to preserve these two trees in their work. This two trees are significant as they are most likely part of the original 250 trees planted by the community in 1911. They are part of the historical, cultural and environmental significance to the local community in the Upfield Line corridor, as significant as the rail infrastructure being preserved as heritage.

The Upfield Corridor Coalition Arboricultural Assessment conducted by Annette Salkeld highlights the priority for tree retention.


“Six trees on the eastern side of the reserve are likely plantings dated from the original community plantings from 1911, with two trees on the western side likely planted in the 1930s or before. These trees are a priority to retain during the level crossing removal process. The thirty-one trees rated as having a high arboriculture value and should be a priority for retention through the level crossing removal process, including amendment to construction and building designs to accommodate.”

LXRP ignores the cultural and environmental value of the older trees and thus there value in retention and providing solutions to work around them.
Salkeld also stresses the importance of retention of high value mature trees for their continuing biodiversity value. Applying a value methodology to the high rated trees indicates their monetary value: “The population of high rated trees is estimated to represent nearly $1 million of value to the Moreland community.” The heritage and cultural value is on top of this, preserving heritage and culture is often of incalculable value to local community.

The significance lies in being part of the original plantings by the community in 1911 auspiced by the Coburg Progress Association after a successful community campaign to establish the Moreland Reserves for public use. As significant trees, they have the potential to have decades, if not centuries of life providing a link for future generations to their planting and establishment of the reserves.

I note the English Elm will be retained, yet the two Sugar gums will not. No adequate explanation or costs of retaining the two sugar gums has been provided by LXRP.

I asked my teenage daughter, Tarryn and her friend Jessie, what they thought about the proposed changes with level crossing removal at Moreland; Both of these young adults used the parklands growing up. As teenagers they used the space, especially on the east side, to socialise with friends. They highlighted that this was their ‘sacred space’. Verbatim comments:

“Least amount of fucking around with gardens and playground” and “Keep the mature trees, especially the Sugar Gum trees next to the playground”

I note the Moreland Council independent heritage report by Ruth Redden states clearly, “The age of the trees contributes to the intactness and setting of the historic station;” Trees as part of the early 20th century plantings should strongly be considered as part of the social and community heritage.


In regard to Service Route works:

- additional evidence should be sort that the proposed routes are the best option from a heritage perspective, and that more mature trees cannot be retained.
- A cost analysis comparing the proposed service routes vs an alternative option (including building the new station on the south side of Moreland Road where less trees will be disturbed.

I recommend a financial bond also be placed with Heritage Victoria for the safeguarding and guaranteed reconstruction and relocation of significant elements.

10. If there are detrimental impacts on the cultural heritage significance of the place or object, provide reasons why the proposal should be permitted (s.101(2)(b), (d) and (f) and s. 101(3) of the Heritage Act)

I dispute the claim that the project in the present concept design will improve cycling connections. My analysis of the Upfield Path improvements shows that the present concept design has not resolved the key congestion points at main road crossings and conflict zones around the station precincts. Without these being resolved improvements to the Upfield bike path are of a cosmetic nature, when the improvements should be substantive
given this is a $460 million transport project that should also address the arterial nature of the Upfield Bike path which has thousands of daily cyclists, including use as a major commuter path through Moreland.

12. Alternative proposals that were considered and reasons why these were dismissed (s.101(2)(a), (b), (d) and (f) and s.101(3) of the Heritage Act)

Details in the LXRP application have not shown how the proposed works have been designed to minimise the extent of tree loss to the greatest extent possible, The application should be denied until full assessment of alternative strategies for minimising tree loss is provided.

**LXRP Reasonable and economic Use statement**

**Introduction**

LXRP argue that the work will provide “A safe and well-connected transport network” to improve the “liveability and also its economic activity, productivity and competitiveness.” yet LXRP has failed to demonstrate present active transport movements and the impact of the concept design on future active transport movements.

In particular, LXRP have not adequately addressed siting of stations near the main roads, or over the main roads to improve pedestrian and train passenger accessibility issues, close integration with bus stops and tram stops, or improve cycling flow along the arterial Upfield Bike Path at Bell Street and Moreland Road intersections, and the safety hazards of pedestrian/cycling conflict around station precincts.

Without addressing pedestrian access to stations from the south side of Moreland Road and the north Side of Bell Street, and the extent of cycling traffic along the Upfield Bike Path, congestion for vehicle traffic along Moreland Road and Bell Street will continue.

Currently there are 110 cyclists and 130 pedestrian movements an hour at the Bell Street crossing during morning peak hour. There are 250 cyclists an hour and 130 pedestrian movements an hour at Moreland Road during the morning peak hour. Cycling traffic has increased 100 percent (doubled) from 2017 to 2019 at the Upfield Bike Path and Moreland Road intersection.

Either a full length veloway, or cycle bridges at Bell Street and Moreland Road as part of the rail viaduct structure are the best way to address traffic congestion and conflict with all three modes to actually improve on road east-west traffic flow. Yet LXRP have not provided these solutions as part of their concept plan. Cycle bridges as part of the rail viaduct would minimise the impact on the heritage views and values, rather than a stand-alone cycle ramp structure.

Not addressing the main road crossings as part of providing efficient access to platforms for passengers and cycle flow at main roads, will continue these crossings as dangerous for both pedestrians and cyclists and congested for vehicle traffic.

I strongly contest the statement: “The project will reduce congestion and significantly improve safety for all transport users.”

2 Assessment against Heritage Victoria and Heritage Council Policy Guideline Matters to be considered in determining a permit application under section 73(1)(b) of the Heritage Act 1995

I appreciate that “Public Transport Victoria have identified the Upfield line as one of the rail lines experiencing the strongest patronage growth across the Melbourne rail network due to the significant population growth within Melbourne’s northern growth corridor.” The LXRP then state that “The Upfield Rail line will be a major beneficiary of the Melbourne Metro tunnel, with additional services to be added on completion.” This is only true if the other bottleneck for the Upfield line is resolved by the time Metro tunnel opens: track duplication between Gowrie and Upfield. Without converting the current single track to dual track, the bottleneck of running increased services on the Upfield Line will remain.

The Upfield Line needs major work on its northern end, including track duplication, a second platform at Upfield, a new station at Campbellfield, and ideally extension via the Somerton link track to Roxburgh Park to Craigieburn, and eventual extension of dual electrified track to Wallan to serve the 17 new suburbs in the Northern Melbourne F_growth corridor.

Level Crossing Removal at Camp Road failed to take sufficient fill from the rail cutting, and a shoddy job of signal cabling on the M80 rail bridge was done, as well as failing to construct cycling paths including a tunnel under Camp Road as per their design plans as presented to community consultations. This effectively was work done on the cheap, cost shifting away from the project to be done at some future time.

The Camp Road crossing demonstrates purposeful cost shifting with minimising the work done and thus minimising utility to the community. The current application provides the cheapest design for the Bell to Moreland project without consideration of adequate culture and heritage considerations, let alone improving station accessibility or major improvement to the Upfield bike path use by commuter cyclists.

While LXRP say that “new plants and trees will be incorporated into the reserves”, new plantings do not replace the substantial environmental loss of mature trees, many of them 50 years plus in age, which harbour a broad diversity of species. It will take decades to re-establish such biodiversity and re-establish the canopy shade so important for this area in summer in offering some mitigation of the urban heat island effect in a highly urbanised area.

I understand that some mature trees may need to be removed given the nature of the work, but LXRP have failed to come up with detailed plans to minimise tree destruction. Alternative siting of Moreland Station either to the south of Moreland Road, over Moreland Road, or immediately adjacent and to the north of Moreland road have all been put forward as possibilities to reduce tree destruction and enhance pedestrian accessibility, but LXRP have refused to provide public reasons or costings why each of these solutions could not be employed.

LXRP have failed to demonstrate or show alternative workings or costings to avoid the destruction of so many trees. Until they do provide some alternative work methodologies and costings, their application should be rejected.
2.1.1 Network Benefits

LXRP provide statistics on vehicle movements, train movements and station movements, but have failed to provide any analysis of active transport numbers and movements at the main road crossings and station precincts. Without this information it is difficult to assess the concept designs for active transport, which should be a key component.

LXRP have failed to make their case that there will be a reduction in “lengthy delays to vehicles, pedestrians, cyclists and bus services near the level crossing, particularly during morning and evening peak periods”. If anything congestion for vehicles will remain the same and main road crossings will further hinder pedestrian and cycling crossing due to the absence of boom gate time and the ‘Upfield Wave effect’. These crossings, may become even more dangerous to cross, at complete odds to the aim of level crossing removal to make these roads safer for all users.

While LXRP identify that ‘Delays and congestion caused by the operation of the boom gates reduce the effectiveness of train, bus and tram services, the present operation of boom gates actually increasing the priority flow of cyclists and pedestrians crossing main roads. LXRP fails to mention this.

2.1.3 Local Benefits

I strongly contest the assumption that current concept design will “Improved safety by eliminating conflict between road and rail users, pedestrians and cyclists.” Congestion points at the main road crossings with pedestrians and cyclists will continue. Conflict zones between pedestrian and cyclists around station precincts will continue. Ideally better access to station platforms for train passengers should be provided, if necessary through elevated ramps, and cycle bridges should be provided to cyclists at main road crossings.

Reverse priority for active transport should be implemented at Reynard street and Munro Street crossings. While this is likely to be achieved for Reynard Street, it also needs to be implemented at Munro street, perhaps through lights where the default is green for active transport and vehicle set off the light cycle through an in-road traffic sensor. I perceive this solution may be actively resisted.

While there may be a marginal improvement in the reliability of the Upfield line, major improvement will not come until track duplication for the Upfield line is completed and track extension to Craigieburn is done to allow trains to access the Craigieburn maintenance workshops and stabiling area.

The improvements to cycling are modest including a section of dedicated bike path, and also increased east-west diffusion possibilities. But the main congestion points and conflict zones remain and the arterial nature and traffic flow of users on the Upfield Bike Path has not been adequately considered or dealt with as part of the concept design.

LXRP says they are “Providing Disability Discrimination Act 1992 (Commonwealth) (DDA) compliant access to the stations and across the rail corridor; ” In their initial briefing to Moreland Councillors Moreland Station was only getting a single lift for each platform. This is problematic for disability access when lifts break down or when they are undergoing maintenance. A minimum two lifts per platform are required for redubndancy for ensuring disability access.

The volume of station entries is much more at Coburg with an argument for escalators to be provided for the greater numbers of people accessing the platforms. LXRP have not conceded this.

The present proposed siting of the elevated station at Moreland reduces it’s accessibility to residents on the south side of Moreland Road and better integration with bus services and tram services.
Conclusion

This is a major infrastructure project for our community and it appears it is being done on the cheap with minimal regard to small improvements in pedestrian and station access, improving the Upfield bike path at congestion points and conflict zones, and consideration of community heritage and environmental concerns which would vastly increase its amenity and utility for many decades to come.

The application should be rejected as providing insufficient alternatives in regard to maximisation of retention of trees as part of the heritage overlay, and their heritage, environmental and cultural importance to the community.

Thank you for making a submission to Heritage Victoria. Please note that submissions received outside the advertised period will not be considered as a formal submission but may be considered under section 101(3)(b) of the Act - ‘any other relevant matter.’

To obtain a copy of your own lodged submission please contact Heritage Victoria on (03) 8392 5411 or at heritage.permits@delwp.vic.gov.au.