

North East Link Tunnels Urban Design and Landscape Plan (UDLP)

Manningham City Council Submission

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Interpreter service

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Introduction

1. This submission has been prepared on behalf of Manningham City Council (MCC) in relation to the public exhibition of the proposed North East Link Tunnels Urban Design and Landscape Plan (UDLP) to be delivered as part of the North East Link Project.
2. MCC welcomes the opportunity to provide feedback on the proposed UDLP and acknowledges the consultation that has already been undertaken by NELP and SPARK with MCC officers and other relevant stakeholders affected by the project.
 - Council however raises concerns over the short time frame provided to the community to review the large amount of documentation associated with the UDLP, seek feedback from their various community groups and prepare a submission on such an important part of the NEL consultation process.
3. The UDLP contains designs for the North East Link Tunnels from Watsonia to Bulleen, including new parklands, wetlands, walking and cycling paths, changes to local roads, and connecting the Eastern Freeway upgrades in Bulleen and Balwyn North.
4. MCC does not object to the UDLP, but rather will seek to provide recommendations throughout the submission that aim to improve the overall design and net community benefit for Manningham residents.
5. That said, there are elements of concern within the UDLP that must be rectified.
6. The key areas of Councils submission are detailed as follows:
 - Traffic and Transport
 - Environmental
 - Estelle Street
 - Realignment of Ilma Court
 - Residual Land / Bulleen Industrial Precinct
 - Urban Design
 - Maintenance Responsibilities
 - Bulleen Land Use Framework Plan
 - Other Considerations

Traffic and Transport

Manningham Road Split Interchange

7. Council does not object to the split interchange design of the Manningham Road Interchange, given the improved opportunity this presents for a larger area of land potentially available for development as employment land at the existing Bulleen Industrial Precinct.
8. Council acknowledges the benefits of the new design including:
 - Less traffic and congestion along Bulleen Road
 - Significantly less queuing at the Bulleen Road, Thompsons Road and Eastern Freeway during the peak periods

- Improved access for the Avon Street and Austin Street (precinct) residents to the Eastern Freeway, the North East Link and to the employment area to the South / East
 - Reduced impact on open space within Banksia Park
 - Improved access along Bulleen Road to Marcellin College, Veneto Club and Bulleen Park
 - Retention of the River Red Gum Tree
 - No removal of Helmet sculpture
 - Improved potential for larger land parcels available for development as future employment land at the existing Bulleen Industrial Precinct.
9. However, it is recommended the pedestrian network around the interchange be grade separated to support pedestrian movement around the precinct. This is further elaborated in the section below.

Grade Separated Shared User Paths (SUP) – Manningham Road Interchange

10. Page 139 of the North East Link Tunnels Urban Design and Landscape Plan details the importance of utilising this “once in a lifetime opportunity” to connect the nationally significant cultural assets of the Heide Museum and the cultural precinct to the surrounding parklands.
11. Council supports this premise and recommends that if this opportunity is to be truly seized upon, then the entire pedestrian / shared user path network around the interchanges must be grade separated to support pedestrian / cyclist movement around the precinct. This is of vital importance given the future use of the site which is anticipated for employment and cultural uses.
12. Page 68 of the North East Link Tunnels Urban Design and Landscape Plan makes specific reference of achieving a continuous path between the East Link and Capital City Trail, linking the Main Yarra Trail and the Plenty River Trail for the first time. However, without a grade separated network at the Manningham Road Interchange Council does not consider this objective will be achieved.
13. Further to this, a grade separated pedestrian network at Manningham Road Interchange aligns with multiple State and Local strategic documents including:
- **The Bulleen Land Use Framework Plan (Draft 2021)**
 - **The Yarra Strategic Plan (2022)**
 - **Victorian Cycling Strategy (2018-2028)**: one of the key objectives of this strategy (also referenced within the UDLP) is to create a continuous path between the East Link and Capital City Trail, linking the Main Yarra Trail and the Plenty River Trail for the first time. This objective further supports the need for a grade separate network at the Manningham Road Interchange.
 - **The Yarra River Corridor Concept Plan 2019 (YRCCP)**: outlines Council’s vision for the future use of passive and organised recreational open space along the river corridor from the Eastern Freeway in Bulleen to Finns Reserve in Templestowe Lower.
 - **Manningham Bicycle Strategy (2013)**
 - **Banyule Bicycle Strategy (2022 – 2027)**

All these documents have a strong emphasis on improving the walking and cycling accessibility for the precinct to enhance access to key cultural attractions such as Heide Museum, Bulleen Art and Garden, Banksia Park and the future Banksia Park Walking and Cycling Bridge.

Bulleen Road Interchange / Yarra Link Green Bridge

14. Council does not object to the Yarra Link Green Bridge and the Bulleen Road Interchange. However, Council requests the following changes be implemented to improve the overall design:
- Council is concerned that the radius of the switch back on the Yarra Link Green Bridge is too tight for cyclists. The plan appears very constrained over a relatively small area, which could lead to people 'rat running' through vegetation. Council recommends the switchback be extended over a longer area to flatten the grade.
 - The switchback on the green bridge should include a wheel ramp alongside the stairs to allow bikes to be wheeled up or down.
 - Council considers the provision of seating at pause points along this route to be more appropriate given the steepness of the route, rather than the provision of picnic tables along the switchback route as proposed in the UDLP.
 - Council acknowledges that the picnic tables and BBQs have been provided on top of the Yarra Link Green Bridge. Council considers other locations for these facilities to be more feasible, for example, by the wetlands besides Koonung Creek.
 - The proposed pedestrian connection on the western side of Bulleen Road (adjacent to the Veneto Club and the proposed new car park) should be changed to a SUP connection to allow cyclists exiting the switchback to continue traveling north on the western side of Bulleen Road.

Bulleen Park

15. Council supports the provision of a signalised intersection for the entry into Bulleen Park and wishes to ensure the access arrangement is maintained throughout the project.
16. Council does not support the proposed car park layout for Bulleen Park, there are concerns that access arrangements for other larger vehicles such as buses, or the overall use of Bulleen Park by several sporting clubs and thousands of users on weekends, has not been adequately considered.
17. It is recommended that any opportunities to increase car-parking within the Bulleen Park / Road precinct is capitalised upon. Council's concerns, as has previously been submitted to the State, relate to car parking at Bulleen Park / Veneto Club currently being at a premium, with overflowing onto Bulleen Road occurring when both sites hold major events.
18. Council seeks that an increase in permanent parking spaces in Bulleen Park be included in the final detailed design.

Shared User Path Connectivity

19. Building on the above points, the provision of new walking and cycling infrastructure to promote and improve active travel is a key strategic goal of Manningham Council. Council acknowledges the proposed shared-user paths and pedestrian network within the Bulleen Road precinct, however, recommends the following changes be implemented to improve the network.
20. Banksia Park and Heide Museum have national significance with the Museum being one of Manningham's largest tourist attractions. Additionally, the future Banksia Park walking and cycling bridge over the Yarra River (which has secured State Government funding for detailed design / construction) will provide a connection to the Heidelberg Activity Centre and Railway Station, which will result in greater walking and cycling activity in this precinct. It is important that residents to the east of the Manningham Road Interchange have access to Banksia Park and the services within the Heidelberg Activity Centre including healthcare, employment, and education. Therefore, the provision of a shared user path along the eastern side of Bulleen Road should be considered to allow for an eastern connection into Banksia Park.
21. The proposed shared user path on the east side of Bulleen Road provides no direct connection into Marcellin College. The proposed path on the western side of the new service road (on the opposite side of the road to Marcellin College) is not considered acceptable as this will result in students walking on the road / vegetation and run the risk of illegally crossing to access the campus. Therefore, Council strongly requests a connection be provided on the eastern side of the service road to ensure students can safely access the campus.
22. A formal footpath needs to be provided on the west side of Bulleen Road between Manningham Road and Bridge Street adjacent to the residual land parcel proposed for future employment / development. This land may not be developed for some time after construction of NEL is completed and it is therefore imperative that while this land is vacant, pedestrians continue to have a formalised path for the safety of all road users.
23. Council seeks further details on how the Shared User Path has continuity from Manningham Road to the existing connections (across the Yarra River under Banksia Street). Considerations must be given around slope management and good lighting.
24. Further clarity is sought on how the southern interface underpasses at the Bulleen Road interchange connect with the proposed shared user path.
25. North East Link Tunnels Plan 0060 (pg. 127) incorrectly shows the location of the existing Manningham Road underpass. The underpass is located further east towards Manningham Road and requires amending.
26. The existing pathway along the Yarra River adjacent to the proposed Veneto Club car park extension is not shown on several plan images throughout the UDLP. Council wishes to ensure this path's retention given it is highly utilised by the public. Council further requests that it is detailed on all relevant plans, particularly those showing shared user path connections.

27. Council would like to request that the connection between Bolin Bolin Billabong and the underpass at Banksia Park is re-established (along the eastern side of the Yarra River) and links directly into Banksia Park. This will provide a connection to the existing cycling network within the precinct and provide wider accessibility to key trip generators along the river corridor.
28. Along the shared user path network, it is recommended that the inclusion of pedestrian / cyclist amenities, such as seating nodes, lighting, wayfinding signage, bike hoops and public toilets, are catered for. It is also recommended these amenities be included within and around Banksia Park and Heide Museum.
29. To improve connectivity to the shared user path for residents on the east of Bulleen Road, Council recommends a SUP connection be established between Avon Street and Golden Way.
30. The proposed cycling lanes on the east of Bulleen Road terminate prior to the Golden Way signalised intersection and continue after the intersection. Council recommends the cycling lanes continue across Golden Way to improve cyclist safety, via the use of cyclist "jump box" or other line marking as required.
31. The proposed cycling lanes on the south-western side of the Bulleen Road eastern freeway interchange (Figure 97 item 2E) appear overly complex and do not provide a direct connection to the Koonung Creek Trail. Further detail is required in relation to their connectivity to the wider network.

Environmental Impacts

Koonung Creek

32. Koonung Creek Linear Park and the reserves within the creek corridor are a significant passive recreation asset to the community in the southern part of Manningham.
33. Section 4.3.4 Figure 79 should define the Koonung Creek more clearly, given its environmental significance to the region.
34. As has previously been submitted to the State, Council's concerns relate to undergrounding of the creek. The undergrounding of sections of the Koonung Creek would degrade, and potentially destroy, the aquatic habitat quality and create additional barriers to fish passage and as such objects to any further piping of the creek.
35. Council strongly urges that the daylighting of the Koonung Creek be increased, and the undergrounding be minimised to mitigate the negative environmental impacts of the project.
36. Council also considers that the widening of the Eastern Freeway will impact the Koonung Creek's habitats and ecologies. Council requests that measures be put in place to minimise the widening of the freeway within its existing footprint.

37. Section 5.5.3.2 Table 37 Point 18.3 (page 239) details that daylighting waterways is not applicable. Council has concerns regarding this, particularly as it has been mentioned elsewhere that the interchange will have elevated structures to protect Koonung Creek rather than sending Koonung Creek to culvert. Clarity is sought on this matter to ensure no further piping of the creek occurs and that daylighting of the creek be increased.

Bolin Bolin Billabong

38. The Bolin Bolin Billabong is a culturally and environmentally significant area of the Yarra River.
39. EPR FF2, clearly states that this area is a no-go zone for the NEL project and that monitoring, and mitigation measures must be implemented as per EPR FF6.
40. In addition, Condition 4.5.3(b) of the projects Incorporated Document states that Bolin Bolin Billabong is a no-go zone.
41. Serious concerns are raised that the significance of the Bolin Bolin Billabong has not be considered, given the below observations noted within the draft UDLP:
42. Item 25 in Section 5 of Figure 96 shows runoff being directed to the Bolin Bolin Billabong. This is considered a significant issue and must be rectified to show no runoff into the Bolin Bolin Billabong.
43. Council also has further concerns around this matter as point 9 within Section 6 (page 266) makes no specific groundwater response references to the Bolin Bolin Billabong. This is concerning given the significant cultural importance of the area.
44. Section 6 of the Storm Water EPRs makes no mention of consolidating the Bulleen flats irrigation systems. Further to this, SW12 does not mention maintenance of Bolin Bolin Integrated Stormwater Harvesting System. Consideration must be given to include these matters to ensure the significant cultural and environmental values of Bolin Bolin Billabong are appropriately protected during and after construction.

Estelle Street

45. Council has consistently raised its serious concerns with the proposed widening of the Eastern Freeway to facilitate the NEL project and the impact this has on the abutting residential areas and open spaces in particular Estelle Street.
46. Council continues to strongly object to the widening of the freeway in the vicinity of Estelle Street and does not consider the outcomes detailed in the UDLP to be acceptable.
47. Page 195 and 196 within Attachment 3 (Urban Design Visualisations) of the UDLP show the proposed noise wall arrangement for Estelle Street. It is noted that this arrangement for Estelle Street will have a significant negative impact on the streetscape and residential amenity.

48. It's difficult to determine from the plans or the renders how tall the noise wall is or how far away it is from existing dwellings, however, the loss of existing canopy cover from the southside of the street, increased height of the wall and closer proximity to residents will exacerbate the visual dominance of the wall.
49. Additionally, the current proposal does not allow enough offset for appropriately scaled planting. The northern orientation of the noise wall will also significantly reduce the ability for planting to establish into a landscape buffer.
50. Estelle Street is the only part of the NEL project where open space has been completely removed with noise walls located directly adjacent to the proposed SUP.
51. This impact to the community is unacceptable and we strongly urge the North East Link to reconsider the widening of the freeway in this location.
52. To further support this, the Minister for Planning's assessment of environmental effects identifies that traffic function can't be the sole consideration when designing the Eastern Freeway. His assessment states:
- *"I also accept the IAC's conclusion that the traffic performance and functionality of the project needs to be balanced against the environmental effects of the built form. A detailed design that balances these occasionally competing objectives is the appropriate outcome".*
53. The Minister continues this theme by stating:
- *"I consider that the implementation of the IAC's recommended changes to EPR LP1 (IAC Recommendation 18) will likely assist in achieving a narrowing of the ultimate road alignment to provide improved visual, landscape and urban design outcomes. This EPR applies to the entire project alignment, but it is particularly important that consideration is given to the key interfaces identified by the IAC, including along the Eastern Freeway where it is adjacent to residential properties and valued open space, and the proposed locations for construction compounds".*
54. It is with these statements in mind that Council reiterates its objection to the design and impacts on Estelle Street and urges that the noise wall setbacks are increased and that further design treatments (colour, recession, green walls etc.) be incorporated to minimise the cumulative impacts on the residents and local community.
55. It is also further suggested that various Intelligent Transport Systems be investigated and incorporated into the Eastern Freeway Design to retain the width of the freeway within its existing footprint, or at the very least reduce its encroachment into the open space along the north side of the Freeway.

Realignment of Ilma Court

56. The demolition of several residential properties on Ilma Court and of the former “Taos Restaurant” along Bulleen Road has presented opportunities to improve the local network and its interface with Bulleen Road.
57. Council seeks the realignment of Ilma Court to the existing signalised intersection of Bulleen Rd / Golden Way (image 1).
58. Council considers there is significant merit for this proposal to be implemented as part of the NEL designs, as noted below:
 - The Ilma Court / Bulleen Road intersection currently only allows for left in and left out movements, resulting in residents wishing to travel south along Bulleen Road to cross multiple lanes of Bulleen Road traffic to undertake a “U” turn at the Golden Way signals.
 - The realignment of Ilma Court with the signalised intersection of Golden Way creates a standard signalised cross intersection. This will allow for all left / right turn movements to occur via traffic signals and improves access arrangements for the Ilma Court / Robb Close residents and removes the need for a “U turn” signal phase.
 - A standard cross signalised intersection is unlikely to cause any delays to the Bulleen Road traffic.
 - The new Ilma Court leg can operate in conjunction with the Golden Way signal phasing, thereby not requiring any reduction in traffic throughput on Bulleen Road.
 - The proposed road realignment still allows opportunities for the State to redevelop the acquired residential parcels of land.
 - The realignment will improve the safety of all road users by not requiring the Ilma Court traffic to cross over two lanes of Bulleen Road to access the “U” turn opportunity.
59. Council considers that this realignment can be undertaken closer to the conclusion of the NEL tunnel construction.



Image 1: Indicative Ilma court realignment

60. Overall, its considered that the proposed realignment of Ilma Court with Bulleen Road / Golden Way has significant merit in terms of safety, improved amenity and can easily be incorporated into the NEL project designs with limited impacts on the NEL budgets.

Residual Land/ Bulleen Industrial Precinct

- 61. Council has previously raised its concerns with the loss of the Bulleen Industrial precinct and the impact this will have on the local community to access jobs and services.
- 62. Given the loss of local employment land (Bulleen Industrial Precinct) Council is keen to ensure the parcels of land for future employment at the Manningham Road interchange are easily accessible and requests the interchange design does not preclude the provision of future vehicle access into the site.
- 63. Throughout the UDLP material, there are numerous examples of where the future residual employment land is not shown as hatched. Council strongly requests that all land shown in this area is not shown in green but is rather hatched and clearly denoted as employment land.
- 64. The west parcel of land adjacent to Bulleen Art and Garden has been denoted as “potential” land for future employment (or in some instances not denoted at all). Council recommends the wording be clearer and be changed to be consistent with the other employment land notations to read as “*future development area.*”
- 65. The River Red Gum site appears very constrained. Council requests further information on how NERP proposes to protect the 300-plus year old tree during construction. The proposed notation “*River Red Gum Tree to be Retained if Possible*” is not considered robust enough to satisfy Council that all possible measures will be

taken to protect the tree. Additionally, Council considers the projects response to EPR AR1 to not be adequate and in line with the requirements to ensure the retention of the River Red Gum.

66. Therefore, Council recommends the wording within EPR AR1 be adopted and implemented throughout the UDLP. ERP AR1 reads as follows:

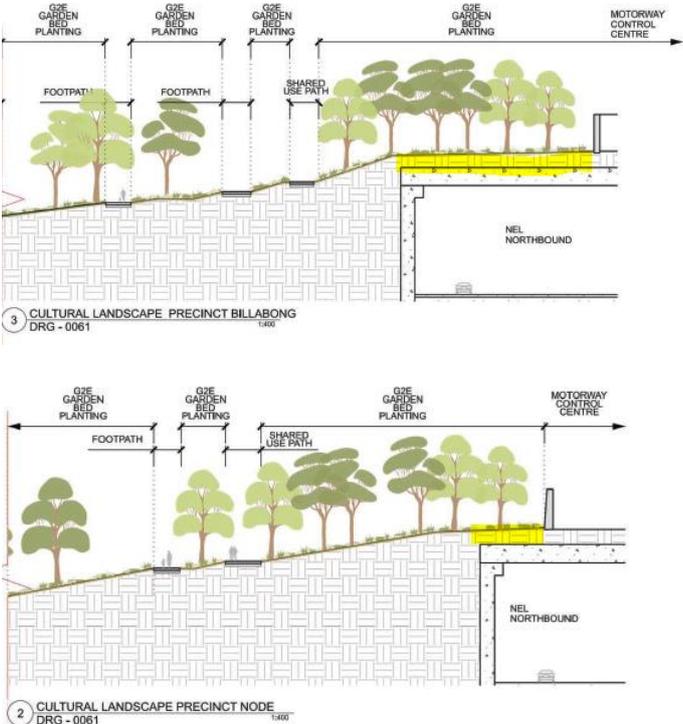
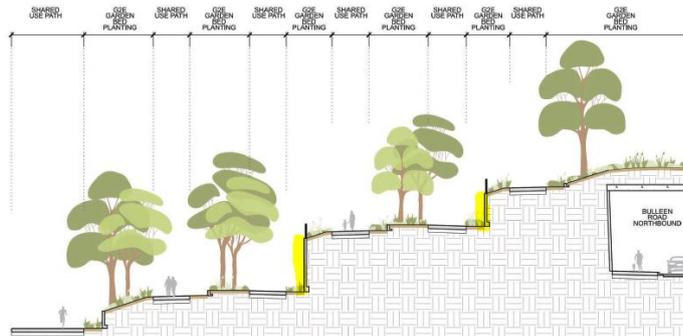
- *Tree retention must be maximised to the extent practicable through detailed design and selection of construction methods to minimise canopy loss, and in accordance with EPR FF1, including by retaining trees where practicable and minimising potential impacts to trees. This includes the River Red Gum (Caltex Tree) at 39 Bridge Street, Bulleen.*

Urban Design and Landscape Architecture

67. The urban design outcomes are imperative for visual and residential amenity to be maintained or improved. Council considers further refinement of urban design outcomes are required. The below table details comments relating to urban design and landscape architecture matters.

Issue Topic	Comment
Motorway Control Centre Retaining Wall	The retaining wall behind the car park appears excessively high. Council requests further detail on what this looks like visually (cross sections). It is also recommended that visual treatments are incorporated onto the wall to soften its visual appearance. This is of particular importance given the wall's proximity to the Yarra River and the Yarra Strategic Plans principle of ensuring no sheer walls are visible from the banks of the Yarra River.
Motorway Control Centre pedestrian access	It is recommended that reconsideration be given to an improved design for the pedestrian access of Motorway Control Centre building. One possibility could include a plaza/forecourt access with integrated stairs/ramps.
Wayfinding signage	Detail to be provided on how wayfinding signage will be incorporated into the project.
Wayfinding Signage	All new proposed wayfinding signage should integrate and be consistent with the existing surrounding sign styles. This is of particular importance along the trail network.
Footpath Widths	Provide proposed widths for footpaths to ensure future widths are catering for expected increased pedestrian activity.
Shared User Path Widths	Provide proposed widths for Shared Use Path. Ensure that potential conflict between cyclists and pedestrians is mitigated and / or minimised.
Share User Path Crossing	Consideration to be given for an additional safe crossing point across Bulleen Road between Golden Way and Manningham Road.
Shared User Path adjacent to noise wall	To improve user amenity, it is recommended that all noise walls adjacent to shared user paths include a vegetation/landscape buffer.
Shared User Path Lighting	All SUP lighting should be category P2/3 standards
Switch Back Yarra Link Green Bridge	Clarification is sought on what the walls at the switchback are made of and what the width of paths along the switchback.
Yarra Link Green Bridge Lighting	Clarification is sought on where the connectivity of the lighting from Yarra Link Green Bridge will lead to. Consideration should be given for the lighting to lead to an obvious location at both ends. This is of particular importance for passive surveillance and CPTED principles.

Issue Topic	Comment
Underpasses	<p>Council is supportive of the various underpasses throughout the UDLP, however, it is imperative that the pavement of the underpasses are protected from flooding and debris.</p> <p>Underpasses must be designed to allow for through sightline from both entrances for safety and passive surveillance purposes.</p>
Yarra River Informal Walking Track	<p>The informal walking track on the east side of the Yarra River should be reinstated to provide a connection to Banksia Park. Bridges are required to be built over the Billabong.</p>
Cultural Heritage Precinct Node	<p>Further detail is required about the design of the Cultural Heritage Precinct Node and the WSUD elements (i.e. relationship with the topography, street furniture, gathering areas, materiality, wayfinding, lighting, shelters, interpretative signage, public art, etc)</p> <p>Further detail is also required about how the Cultural Landscape Trail around the indigenous wetland will be designed (interpretative signage, materials, pause points, gathering areas etc.)</p>
Enhancement of the biodiversity and habitat links along the Yarra River corridor	<p>There is no enhancement of the biodiversity and habitat links along the Yarra River corridor and around the Bolin Bolin Billabong area. Additionally, no reference has been made to planting along the Yarra River, particularly beneath the Manningham Road bridge. Given the proximity of the works to the Yarra River consideration should be given to enhance the vegetation along the Yarra River.</p>
Roadside Planting Buffer	<p>Roadside planting at Bulleen Road should be maximised to mitigate visual impacts. Particular consideration should be given to include a planting buffer between Bulleen Road and the Bolin Bolin Billabong to minimise visibility of road infrastructure.</p> <p>An additional landscape buffer should be provided for between Bulleen Road and the abutting residential areas to improve amenity.</p>
Screen Planting Veneto Club	<p>It's considered that screen planting to mitigate views from Veneto Club could be improved/maximised.</p>
Planting Recommendation	<p>For planting design (along medians, parklands, etc) it is recommended to consider native low maintenance species, complying with CPTED requirements.</p>
Landscape Planting Detail	<p>Further details are required on how planting design varies depending to its function/context (screening, riparian, open views, etc). Further detail should be provided beyond planting palette.</p>
Management of Mature Trees	<p>Further details are requested on how mature trees within the construction area will be managed. It is noted that trees along the boundary will be reinstated where possible, does this apply to other impacted trees within the scope of works?</p>
Soil depth – Tree Planting	<p>Further details are required on the cross sections exhibited in the UDLP. Details are required to specify soil depths to ensure tree</p>

Issue Topic	Comment
	<p>locations are feasible. The below images highlight the areas where this is of particular concern.</p> 
<p>Visual Bulk – Blank Walls</p>	<p>It is recommended that treatments should be provided to reduce the visual bulk of blank walls (incorporating landscape treatment, reducing heights of retaining walls). The below cross section highlights areas of particular concern.</p> 
<p>Further plan details</p>	<p>To better assess the visual impacts of flood walls and noise walls Council requests that levels on the top of the flood walls and noise walls are provided.</p>

Maintenance Responsibilities

68. Council does not support the handover of new assets to Manningham City Council associated with the NEL project for future maintenance. Council has neither the resources nor funding to adequately maintain structures such as retaining walls, flood walls or other structures along the alignment. It is Council's strong view that ongoing

maintenance responsibilities of infrastructure associated rest with the NEL project and State Government.

69. In addition, clarity is sought on the following maintenance responsibilities:

- The new service road abutting Marcellin College and the Manningham Hotel.
- The proposed wetlands and rain gardens along the Koonung Creek Linear Trail
- Vegetation and new tree planting

This is not an exhaustive list and will be worked through with NELP during ongoing operational meetings.

Bulleen Land Use Framework Pan (BLUFP)

70. In general, the tunnel package and the design of the southern interface zone accord with the directions of the draft BLUFP and the key principles of the Yarra Strategic Plan.

71. An objective of the draft BLUFP is to create an internationally significant cultural place centred on the relationship between the arts, the natural environment and Traditional Owner heritage.

72. The UDLP acknowledges and celebrates the First Nations people by incorporating a 'Cultural Landscape Precinct' that integrates with the area's ecological and cultural values of the Yarra River Valley and floodplain landscape.

73. The tunnels package, including the portals have been designed to be functional yet incorporate sculptural design elements which is consistent with draft BLUFP.

74. The draft BLUFP states:

'The proposed gateway should be both functional and sculptural, and could incorporate North East Link infrastructure (portals, stacks, control buildings), a new cultural place and other development opportunities. It provides an opportunity to screen views towards elevated roads from the street and from the Yarra River.'
(pg45)

75. Objectives 1 and 2 of the draft BLUFP seeks to: Improve connectivity by establishing new pedestrian and cycling linkages; and enhance indigenous landscapes and expand parkland connections. The reduced Manningham Road interchange footprint provides opportunities for improved open space linkages and walking and cycling networks, along with revegetation and improved biodiversity outcomes.

76. The draft BLUFP identifies the future renewal of the Bulleen Industrial Precinct. The reduced footprint at the Manningham Road interchange provides an improved opportunity to create employment uses and urban design outcomes that reinforces the cultural, natural and environmental values of the area.

77. In saying the above, it is clear from Council's analysis of the UDLP that elements of the design do not align with certain principles discussed in the Yarra Strategic Plan and Bulleen Land Use Framework Plan. These matters have been elaborated upon in Council's above submission and need to be addressed.

Other Considerations

78. Section 4.2.4 on page 55 makes mention of photovoltaics, Council queries why no battery storage has been included, as it would meet sustainability objectives.

79. Section 4.2.11 on page 211 does not have any supply from PV back to the grid, Council queries how excess energy is harnessed in this circumstance and not lost?

Conclusion

80. Overall, MCC considers that proposed UDLP presents opportunities for enhancement to Manningham Road Interchange and Bulleen Road Precincts.

81. However, Council respectfully requests the recommended changes and considerations as set out above are incorporated into the UDLP.

82. We look forward to reviewing the final plans for the UDLP and a demonstration of how this design addresses the matters raised in Council's UDLP submission.