

13 September 2015

Mr John Merritt  
Chief Executive  
VicRoads Head Office Administration  
60 Denmark Street  
KEW VIC 3101

By email: [noisepolicyreview@roads.vic.gov.au](mailto:noisepolicyreview@roads.vic.gov.au)

Dear Mr Merritt,

**Re: Review of the Vicroads Traffic Noise Reduction Policy**

Thank you for the opportunity to provide a submission on the above policy.

The Property Council of Australia is the largest and most active advocacy organisation in the property industry. The Victorian Division's transport policies are informed by the Industrial, Infrastructure and Logistics Committee and the Residential Development Committee, comprising industry experts in freight, logistics, industrial and residential development.

The Property Council is committed to the long term economic prosperity of Victoria, which in turn creates jobs and strong, liveable communities. The industry is the State's greatest taxpayer and employer. Importantly, it is the third biggest generator of economic output. Yearly, it generates 24 per cent of Victoria's total tax revenue and is responsible for \$37.5 billion of direct and indirect economic output.

Please find attached the Property Council's submission, which addresses the questions raised in the discussion paper.

Should you have any queries, please contact Linda Allison, Policy and Business Development Executive on 9650 8300 or [llallison@propertycouncil.com.au](mailto:llallison@propertycouncil.com.au).

Yours sincerely



**Jennifer Cunich**  
Victorian Executive Director

## **Property Council of Australia (Victorian Division)**

The Property Council of Australia is the largest and most active advocacy organisation in the property sector. We have 2,200 member companies that represent property assets worth over \$600 billion. Approximately 500 of these members are part of the Victorian Division.

Members of the Property Council represent the entire property investment cycle: finance, design, development, property maintenance and the services that underpin the sector.

The industry is the State's greatest taxpayer and employer. It is the third biggest generator of economic output. Yearly, it generates 24 per cent of Victoria's total tax revenue and is responsible for \$37.5 billion of direct and indirect economic output.

Through our advocacy the Property Council is committed to the long term economic prosperity of Victoria, which in turn creates jobs and strong, liveable communities.

## **Position Summary**

The Property Council welcomes the timely review of this issue. The discussion paper outlines both the causes of traffic noise and the complexities in mitigating the issue. We note that many of the causes of noise are behavioral, and no amount of noise mitigation in the form of barriers and building design will completely eliminate noise from heavy acceleration and deceleration.

The Property Council believes greater emphasis should be given to vehicle manufacture regulation in minimising noise emitted over time. This would tackle the source of the issue rather than applying a band aid solution or forcing extra costs on the development industry.

## *Cost impositions*

The Property industry contributes a quarter of the State Government's direct tax revenue and also contributes hundreds of millions of dollars in indirect charges, contributions, fees and levies each year. The costs to the development sector through the lifecycle of construction contribute heavily to the housing affordability crisis. A snapshot of costs and charges include:

- Council rates;
- Planning reports to meet council requirements (planning proposals, architect fees, 3D model preparation etc);
- Development Application fees;
- Planning Permit fees;
- Development Contribution Plans;
- Public Open Space Contributions;
- Metropolitan Planning Levy;
- VCAT Application Fees;
- Service Authority Fees;
- Water, Sewer and Drainage Levy;

- Utilities connections;
- Building Permit Fee; and
- Land Subdivision Fees

The Property Council does not support any additional regulations to mitigate noise. Such regulations will add to an already exhaustive list of fees and charges, which negatively impact on housing affordability. Increased red tape in this area would also impact on Victoria's competitiveness as an investment destination.

**Q1. Are there measures or tools to manage traffic noise in addition to those presented in this paper?**

Greater emphasis should be given to vehicle manufacture regulation in minimising noise emitted overtime. This is tackling the source of the issue rather than applying a band aid solution or forcing extra costs on the development industry in building affordable accommodation for the community.

Regarding road construction, VicRoads could consider adopting quieter surfaces such as rubberised asphalt for roads where volumes are in excess of say 50,000 vehicle movements per day or where large intersections exist with high existing traffic volumes and higher proportions of truck movements. It is understood that some low noise pavements require additional maintenance costs. Further research into pavement design and maintenance costs should be undertaken over time. Such solutions should not be adopted for initial road construction in the growth areas as low initial traffic volumes do not justify the additional cost of rubberised asphalt.

Sound walls for freeways should always be located within the freeway reservation / easement, including provision for maintenance tracks and other management requirements. Greater residential density limits the impact of noise substantially for properties not directly abutting the road, and should be encouraged as an abuttal to freeways where appropriate in the context of future development and strategic planning. This can be in the form of both building structure, but also interlocking subdivision design which can minimise noise migration to streets / dwelling behind the noise source.

The distance the noise walls are placed from the source significantly impacts the height design and cost. This is not mentioned in the discussion paper. The closer to the source of the noise, the lower the height required to achieve a given noise reduction. VicRoads are currently replacing old noise walls on the Monash much closer to the travelling lanes than the original at about the same height. This is presumably to improve their performance.

**Q2. Does the hierarchy of control reflect your understanding of how traffic noise should be managed**

The hierarchy of control is appropriate. However, for newly developing areas the emphasis within the hierarchy should recognise that noise will not emerge for decades as the areas fully develop and as such unreasonable initial costs should not be imposed on subdivision or land development proposals.

The benefits of higher density and solid surface treatments such as buildings as noise shielding, where urban design issues can be addressed or where they are freeway abutments.

VicRoads as the proponent of new freeway construction should be responsible for the construction of noise walls or other such treatments to protect residential amenity in existing or proposed residential areas.

**Q3. Do you support a principles based approach to policy or believe the existing policy should be retained in some form**

The principles based approach is supported providing clear guidelines are applied and cost and benefits of policy are carefully considered and the development industry is consulted throughout the policy development process.

**Q4. Do you support the stated proposed policy objective and guiding principles**

The shared responsibility principle is severely flawed. Where VicRoads requires sound walls they should be paid for, constructed and maintained by VicRoads on the road reserve. This will ensure that the most cost efficient outcome will be acceptable to VicRoads. Requiring developers to provide land additional to the road easement for the building and maintenance of sound walls is not reasonable. If VicRoads were subject to these obligations, they may allow other barrier solutions at the request of developers to meet the standards. There is no incentive for VicRoads under the shared responsibility model to accept cost effective solutions.

The shared responsibility principle creates a disincentive for VicRoads to support the delivery of innovative and cost effective solutions, which is potentially a perverse outcome created by the policy.

**Q8. Do you support the notion of cost effective traffic noise management?**

The Property Council supports cost effective traffic noise management, to be applied to freeways only.

**Q9. What other factors do you think should be considered in applying “reasonable” and “feasible”?**

The effectiveness of the noise wall will also be influenced by its location relative to the road and to the affected houses. This has not been assessed in the examples.

**Q10. How can traffic noise mitigation be made more cost effective so that greater benefits can be provided to the community?**

The Property Council supports encouraging barrier built form solutions to freeways in appropriate locations.

VicRoads should be fully responsible for noise wall construction and maintenance, particularly in greenfield locations. This will remove the potential incentive for Government authorities to apply a fixed developer fee under the shared responsibility model regardless of cost or community benefit. It needs to be acknowledged that any cost added to the land development process is borne by home buyers and will make housing less affordable.

Traffic noise may also be mitigated by encouraging barrier housing in appropriate locations.

## **Other matters**

### *Acoustic matters*

Acoustic engineering demonstrates that higher density buildings can create effective noise control as the built form interrupts the transmission route of noise to sensitive uses. VicRoads policy should be amended to acknowledge the physical properties of higher density dwellings which can create a shield for dwellings located behind – for example proximate to an arterial road or a freeway. This is particularly relevant in inner and other established residential areas in Melbourne where higher density developments are now commonplace.

The effectiveness of a noise wall will also be influenced by its location relative to the road and to the impacted houses. The closer to the road surface, the more effective the same wall will be.

### *Outer Metropolitan Ring Road*

The document discusses that the early planning of the Outer Metropolitan Ring Road (OMR) which provided a 200m+ reservation in order to enable flexibility for the future horizontal freeway / rail alignment, given the limited preliminary route investigations at the time. It will be very expensive to purchase and maintain a reservation of such unnecessary width for the purpose of providing noise attenuation for the road as is discussed in the document. These requirements should be removed for this project. If, after further design the OMR corridor can be reduced then it should be and surplus land returned for urban development. In addition, where there is any possibility of residential development being a future outcome on both sides of the road it represents a very poor planning outcome, effectively doubling the community separation required for traffic management. The suggestion of further separating travelling lanes from sensitive uses for (partial) noise abatement should be removed on both financial and planning grounds.

### *Educating Prospective Purchasers*

The discussion paper makes reference to educating prospective purchasers on the impacts of traffic (page 24). It is difficult to understand how educating the purchasers of homes to be more aware of the health impacts of traffic noise assists in protecting public health. In many areas traffic volumes are nowhere near their ultimate when homes are built. Even where there are very heavily trafficked roads, such as in the city centre, a pre-sale environment cannot be expected to 'educate' potential purchasers about the day to day impact of noise on purchasers, particularly of multi-story dwellings. In addition, it can be anticipated that many, if not most of the occupants of such dwellings will not be the owners. If public education is warranted, it should be part of a general VicRoads public education program.

As noted in the document, Green Star is a voluntary internationally recognized sustainability rating. As it is not a regulatory tool but a voluntary rating it is not useful or appropriate to use it as an example.