



The Hon. Richard Wynne MP  
Minister for Planning  
Level 16  
8 Nicholson Street  
EAST MELBOURNE VIC 3002

Dear Minister,

**RE: S ECI 2021 04124 – Motion for Judicial Review ('the Proceeding') filed with the Supreme Court of Victoria ('the Court')**  
**Friends of Lorne Parade Reserve Inc ('FOLPR') vs Minister for Planning**  
**Surrey Hills Mont Albert Level Crossing Removal Project (LXRP)**

We refer to previous correspondence for the attention of the Minister dated 11<sup>th</sup> November 2021 (the Correspondence) concerning Level Crossing removal works at Surrey Hills and Mont Albert (the Project).

The Correspondence requested the Minister urgently suspend the Project pending a Proceeding brought by the FOLPR in the Supreme Court.

**As a matter of extreme urgency, we again request the Minister immediately suspend all work on the Project until the Proceeding is heard and determined upon by the Court.**

The Correspondence highlighted the deep seated distress in the community who consider that the Minister's decision to approve the Project is unreasonable. The basis for the Proceedings is balanced, reasonable and objective, and details fundamental failures in the consultation process of the Project.

Despite these community concerns conveyed to the Minister in the Correspondence, over 150 mature canopy trees have been removed by the Project over the last 2 weeks. Many of these mature trees are in excess of 120 years of age with some over 25 metres in height. The Lorne Parade Reserve trees are almost completely removed with some small pockets of trees remaining. The Churchill street trees are completely removed with the exception of Avenue of Honor trees which are the subject of further investigation by the LXRP. The Montrose and Beresford Streets trees are substantially removed as are the trees in Sunbury Crescent.

**The value of mature and heritage trees removed throughout the Project area so far exceeds one million dollars (\$1,000,000) yet the Minister continues to disregard community concerns.**

The removed trees are irreplaceable due to their size and age. It is fundamentally incorrect and simplistic for the Minister to claim all removed trees of significance are being 'offset' and replaced with plantings of small saplings located far from the Project area. The Project design is insensitive and indifferent to the permanent destructive impacts to the local environment and surrounding residential area.



We ask that the Minister act with equity and fairness and provide his response to suspend the Project by no later than 5pm Monday 22<sup>nd</sup> November 2021. Should no response be provided by then it is assumed the Minister has disregarded all reasonable requests by the community for a suspension and review of the Project.

Should this occur we intend to seek the Courts assistance in suspending the Project to prevent further destruction of tress and habitat until the matter can be heard and determined by the Court.

Yours sincerely

**Kirsten Langford**

President – Friends of Lorne Parade Reserve  
[lorneparadereserve@gmail.com](mailto:lorneparadereserve@gmail.com)

22nd November 2021



cc.

Hon. Daniel Andrews, Premier

Hon. Jacinta Allan, Minister for Transport Infrastructure

Mr Paul Hamer MP, Member for Box Hill

Hon. Tim Pallis, Treasurer

Hon. David Davis, MLC, Shadow Treasurer

Dr Matthew Bach, MLC, Member for Eastern Metropolitan Region

Hon. Josh Frydenburg – Federal Treasurer and Member for Kooyong

Hon. Ryan Smith - Shadow Minister for Planning and Heritage

Ms. Louise Staley MP – Shadow Minister for Transport Infrastructure