

Submission Cover Sheet

West Gate Tunnel Project IAC

Sub no:

190

Request to be heard?: Yes

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Attachment: West_Gate_Tunn

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WEST GATE TUNNEL EES AND PROPOSED PLANNING SCHEME AMENDMENT SUBMISSION

1 Introduction

The Planning Institute of Australia – Victoria Division (PIA Victoria) provides the following submission in response to the Environment Effects Statement for the West Gate Tunnel Project (EES) and the associated Planning Scheme Amendment (PSA). The Planning Institute of Australia is the national body representing planning and the planning profession.

2 Strategic justification

The EES outlines the overarching strategic justification for the West Gate Tunnel project as being:

- Inadequate capacity on the M1 corridor
- Over-reliance on the West Gate Bridge
- Inadequate port and freight connections to cater for growth
- Reduced amenity in the inner west
- Mismatch between land use and transport

PIA Victoria agrees that these accurately reflect some of the key strategic land use and transport issues which must be dealt with to ensure Melbourne, and particularly the west of the city, remain liveable and productive over the medium to long term. PIA Victoria considers that:

- Measures are required to ensure that freight traffic from the Port can be managed more satisfactorily to protect residential amenity.
- There is the need to better manage the risks associated with an over-reliance on the West Gate Bridge
- The growing disconnect between projected jobs and population growth across Melbourne is a major economic and social issue which must be addressed.

However, the heart of PIA Victoria's submission is that neither the proposed PSA or the EES have considered whether this project is an appropriate strategic response having regard to other transport and land use options and the relative costs and benefits of those options. Consideration of alternate options is fundamental to a rigorous EES process. Instead, the West Gate Tunnel is presented as a *fait accompli*; the only way that the strategic issues can be managed. Yet using the same points outlined above as the project's strategic justification, it could also be contended that:

- Capacity issues on the M1 corridor are a result of inadequate investment in alternative transport options and the unbalanced land use structure of the city and will not be solved in the long term by exacerbating demand for the road network.
- There are a variety of other solutions which could be used to manage the lack of river crossings.

- Increasing the volume of freight on rail should be considered to help manage port landside capacity.
- A mismatch between transport and land use emphasises the need for Government to support jobs growth in western Melbourne rather than encouraging long distance commuting, which is ultimately unsustainable and will exacerbate social and economic spatial disparity.

3 A need for testing of assumptions and interrogation of options

It is of concern that this project has not been considered by Infrastructure Victoria in its assessment of the state's future infrastructure needs and as such has not been compared to other potential investments. Given that the project has instead derived from an unsolicited proposal to Government, PIA Victoria argues this is a case for maximum transparency and interrogation of alternatives to ensure the proposal is fit for purpose and has weighed all the costs and benefits. As it stands, through the case presented by the EES and PSA, this has not been done and as such there is a need to thoroughly test the assumptions embedded within the proposal and not simply accept that the approach proposed should be the preferred option, either as a whole, or for specific components of the project.

4 Environmental Effects Statement Assessment Framework

In addition to the overarching concerns detailed above, PIA Victoria makes the following submissions in response to specific EES Evaluation Objectives.

4.1 Transport capacity, connectivity and traffic management

EES Evaluation Objective: *To increase transport capacity and improve connectivity to and from the west of Melbourne and, in particular, to increase freight movement via the freeway network instead of local and arterial roads, while adequately managing effects of the works on the existing broader and local transport networks, including road, public transport, cycling and pedestrian transport networks.*

Flawed approach to long term planning

The methodology outlined for the traffic modelling (Section 3.4 of *Technical Report A Transport*) suggests a linear 'predict and provide' approach to the planning for the project; a method of transport planning which is discredited and simply results in an extrapolation of existing conditions, rather than planning which seeks to effect change in accordance with a strategic plan.

The modelling in the EES appears to be only for the year 2031, which will only be a few years after the completion of the project, if it were to proceed. For a major city shaping project, modelling should take into account the long-term effect on traffic volumes, at least within the timeframes envisioned by Plan Melbourne, and the increased network demand this extra capacity will induce over time. It should also consider alternate options. This will help ascertain whether this project is in fact the right one to meet the long term needs of Melbourne's west, or whether other solutions, or a package of works, might in fact more effectively target the issues this project is seeking to solve.

The danger with modelling to such a close date is that it masks future issues associated with unsustainable patterns of transport based around private vehicles. Particularly, there is concern that while analysis of this project focuses on inner Melbourne municipalities, it will have a broader outcome of entrenching domination of car use across Melbourne. For example, at what point will capacity be exhausted on other parts of the M1 and M80 due to the increased demand created by the West Gate Tunnel? How will facilitating private vehicle use impact on local road networks?

A productive central city can best be facilitated by high quality public transport as evidenced by major business hubs around the world. If this objective of Plan Melbourne is to be achieved, then encouraging private vehicle use is the least productive and efficient transport option available. Similarly, for the outer west, an area with an already very high level of car dependence, a project such as the West Gate Tunnel will not support creating more sustainable and productive land use patterns as it will encourage long distance, car-based commuting.

Given Melbourne's rapid projected growth, high quality long-term planning demands a robust assessment of other options. To this end, PIA Victoria wishes to emphasise that:

- Melbourne's growth demands an approach other than a business-as-usual, predict-and-provide approach to transport planning, as evidenced by the modelling underpinning the EES;
- A credible response to climate change needs to see an emphasis on low-carbon modes of transport; and
- Transport planning needs to be led by the State; to this end the Government needs to prepare an integrated transport plan as required by Section 63 of the *Transport Integration Act 2010*.

City exit impacts

Whilst the project provides a significant increase in east-west network capacity, it does not meet the second test in the EES' evaluation objective due to the detrimental effects on the broader transport network. In particular, PIA Victoria highlights concerns at the city end of the project including the Dynon Road and Wurundjeri Way extension. Both these links will have the effect of increasing road capacity directly into the centre of Melbourne and the inner north and south of the city. This outcome bears no relationship to the core strategic justification for the project; indeed, it is directly contrary to the objective of improving capacity on the M1 corridor by unnecessarily inducing demand on those links.

It is likely that these connections will increase traffic demand above what would otherwise be necessary to meet the core objectives of the project, thereby putting pressure on:

- the motorway network outside of the project area; and
- the local road network of the inner city, in particular, Dynon Road which is currently a busy road during peak times, as this serves as an alternative route to and from the city to the West Gate Bridge.

They also affect the scale and level of impact of the West Gate Tunnel project itself, such as the number of lanes required.

For a proposal that is meant to be about primarily providing capacity on the M1 corridor and to the Port of Melbourne, the origin-destination modelling in figures 149-152 in *Technical Report A Transport* illustrate that in fact the outcome will be to encourage many trips around the inner city's already congested road network.

Figure 160 in *Technical Report A Transport* illustrates there will be a projected increase in traffic across the inner north. It is noted that this is an area which will be subject to increasing demands on its local transport network over the next 30 years or more due to a number of large scale regeneration projects such as Arden-Macaulay. This additional traffic will also affect the network performance of on-road public transport, which will be increasingly vital to serve urban growth and development in the inner north-west. This detrimental affect has been noted by the EES (Chapter 25) and yet is dismissed as a minor delay at signals for north-south travel, with no mitigation proposed. This is contrary to the principles of integrated transport planning and contrary to objectives to encourage mode-shift to public transport.

Freight

Issues of improving freight access to the Port of Melbourne and tackling detrimental impacts of truck movements on inner west are of great importance and PIA Victoria acknowledges the need to identify solutions.

However, again it is noted that the West Gate Tunnel takes an isolated approach to the issue, increasing road capacity without considering other solutions. Plan Melbourne policies 3.4.1 and 3.4.2 foreshadow improving freight capacity and the volume of freight carried on rail by pursuing the Western Interstate Freight Terminal and Beveridge Interstate Freight Terminal. In combination with port rail shuttles, these solutions should be explored further rather than a wholly-road based approach which will encourage further truck traffic on the motorway network and other arterial roads.

Cycling

PIA Victoria supports the proposals to provide additional cycling network improvements and improve connectivity between the city and the west as part of the project. However, PIA Victoria would recommend that concerns about the treatment of the proposed elevated veloway should be addressed, including its connectivity, lack of passive surveillance and/or other safety measures such as adequate lighting or CCTV.

4.2 Built environment

EES Evaluation Objective:

To protect and enhance the function and character of the evolving urban environment including built form and public realm within the immediate and broader context of the project works.

PIA Victoria submits that the project does not meet its EES objective in relation to the built environment and the draft PSA has not adequately considered Plan Melbourne and the SPPF's directions in relation to inner city urban renewal. Major concerns have been identified about the effect on future urban regeneration opportunities, such as the E-Gate and Dynon precincts. These precincts have been identified in Plan Melbourne as future development sites and as such should now be considered as major opportunities likely to come to fruition within the life of the West Gate Tunnel project.

Technical Report K Land Use too readily dismisses the issues associated with the development of a major piece of motorway infrastructure on the doorstep of future urban precincts. Whilst a design response to Footscray Road will be required whatever is there, that response will be very different for an elevated freeway versus an at-grade arterial road. The development of the elevated roadway essentially blights this frontage and ensures that any future regeneration will be inward facing. This represents a lost opportunity to integrate a future Dynon development with its surrounds. Although for the medium term those surrounds include a port, over time this can be expected to change.

The E-Gate precinct also represents a major potential lost opportunity. The Technical Report states that due to a lack of detailed proposals then commentary cannot be provided. However detailed plans are not needed to understand the way a major piece of road infrastructure will reduce the capacity, liveability, connectivity and amenity of this precinct in future. In inner Melbourne, where such development opportunities are finite, loss of land for questionable transport outcomes (i.e. city exits for private vehicles) should be viewed dimly. Furthermore, this is proposed in a strategic context which provides strong support for the opportunity for inner-city work-live environments with a focus on sustainability and new economy jobs; an outcome from which the Westgate Tunnel project will detract.

A comprehensive feasibility of the project should consider the value of the land to the State based on its highest and best use. There is also argument for commensurate compensation to be paid to the State to provide for equivalent housing and land use outcomes.

The introduction of large scale road infrastructure within inner Melbourne is contrary to the emphasis on place-making proposed by Plan Melbourne. This proposal as it stands, will create further barriers between urban precincts in an area which is already highly segmented. Nor will it assist with the integration of the established parts of North and West Melbourne, with newer areas to the west.

In addition, it fails to consider other significant infrastructure projects already underway such as Melbourne Metro with a new station proposed at Parkville linking the Biomedical Precinct that will connect to the new Arden precinct via a new station at Arden.

4.3 Health, amenity and environmental quality

EES Evaluation Objective: *To minimise adverse air quality, noise and vibration effects on the health and amenity of nearby residents, local communities and road users during both construction and operation of the project.*

The assessment of human health impacts (Chapter 13) is premised upon the project merely involving a “redistribution of traffic” relative to the ‘no project’ scenario. This conflicts with globally accepted evidence that construction of additional road capacity results in increased overall usage of private motor vehicles, an effect referred to as ‘induced demand’. This consequent increased usage of private vehicles as the discretionary mode for journeys would further exacerbate the predicted ‘Moderate to Low’ deterioration of health outcomes identified by the EES assessment.

Furthermore, no measures have been proposed to mitigate the increase in traffic noise or poor visual amenity for the multiple existing apartment owners abutting Dynon Road. This can also be said for the lack of noise attenuation proposed within the E-Gate precinct and the visually obtrusive nature of what noise barriers have been proposed. PIA suggests that all noise attenuation barriers (community side) should be screened with landscaping to soften the harsh appearance of these barriers.

4.4 Social, business, land use, public safety and infrastructure

EES Evaluation Objective: *To minimise adverse effects on the social fabric of the community, including with regard to community cohesion, access to community services and facilities, business functionality, changes to land use, public safety and access to infrastructure*

In considering the proposal’s ‘Effects on community’ (Chapter 14) the EES report claims improved community connectivity will result from “improving traffic flow and reducing peak period congestion” due to added freeway lanes, along with “Improving pedestrian and cyclist access to Melbourne central city” via extension of the Federation Trail.

Shorter travel times are likely to be temporary (with no projection offered in this section for the timeframe before current congestion levels recur). The volume of pedestrians and cyclists commuting from Werribee or other suburban origins to the CBD is likely to be insignificant relative to induced additional private motor vehicle usage. Claiming this as a positive impact on community connectivity seems misleading.

4.5 Landscape, visual and recreational values

EES Evaluation Objective: *To minimise adverse effects on landscape, visual amenity and recreational and open space values and to maximise the enhancement of these values where opportunities exist.*

PIA Victoria is concerned that the EES and proposed PSA have significantly under estimated the visual and landscape impacts of the project. In doing so the project fails the evaluation objective listed above.

The proposed approach is contrary to Plan Melbourne and the SPPF. Core design principles listed at Clause 15.01 such as:

- Recognition of landscape;
- The public realm;
- Light and shade; and
- Context

are largely ignored in the proposed treatment of the new elevated roadway. Whilst a number of 'iconic' structures are proposed to help enhance the urban design outcomes, there remain a number of fundamental issues. Creating a distinctive and coherent project corridor has some merits, but ultimately the core focus of urban design should be about integrating the proposal with its surrounds, rather than creating an interesting driving experience. In addition, the proposed entry / exit features of the tunnel appear out of context and scale to the existing surroundings. It seems unwarranted to draw such attention to an ultimately underground piece of infrastructure.

Particular concerns identified by PIA Victoria include:

- The elimination of any opportunity to make Footscray Road an iconic boulevard. Plan Melbourne envisioned the creation of wide generous, tree lined spaces as a distinctive element of Melbourne. Over time the opportunity exists to achieve this outcome with Footscray Road, especially as urban renewal starts to take place in coming decades. The proposal as it stands is a retrograde, traffic-engineering focused solution which is entirely at odds with any appreciation for good place making and contemporary urban planning. The proposed 18 lanes of traffic on and above Footscray Road is completely out of proportion with an inner-city location which will be subject to regeneration and will permanently blight the area. If the project is to proceed, the EES must consider alternative treatments, such as further tunnelling, or a re-scoping and downsizing the scale of the project.
- The large new bridge structures proposed for the Maribyrnong River. Given the emphasis in Plan Melbourne on improving water edge parklands, these structures will reduce opportunities for further enhancements of the riverside environment over time. Again, the opportunity for tunnelling should be considered as a mitigation.
- The experience of the City Link viaducts along the Moonee Ponds Creek has shown that it is extremely difficult to create a pleasant recreational environment in such circumstances. This must not be repeated in other parts of inner Melbourne.
- Various proposed road widenings serve to create larger visual barriers cutting through Melbourne's urban fabric.

The various proposed additions to open space networks are welcomed and will need to be designed in conjunction with local councils and communities to ensure they meet local needs. PIA also encourages maximising the vacant spaces under the proposed road infrastructure, where possible, for community uses such as basketball courts and other recreational sports.

Conclusion

The Westgate Tunnel project lacks strategic justification; in particular, alternate approaches to addressing the identified land use and transport issues have not been considered or rigorously tested. This should be fundamental to the EES process. While limited in scope, the responses to the EES Evaluation Objectives also raise concerns, including:

- inappropriate methodology and inadequate extent of traffic modelling;
- lack of an Integrated Transport Plan;
- entrenched inequality for those in the outer suburbs without access to a private motor vehicle; and
- significant detriment that is likely to be caused by city exits and infrastructure, in terms of both traffic and future development opportunities.

In considering the EES and PSA, PIA Victoria urges the Minister and the Inquiry and Advisory Committee to be mindful of, and give due regard to, the objectives of the relevant Acts. Support for such a significant, city shaping infrastructure project should be premised on delivering the objectives of the Acts, which include:

- *To secure a pleasant, efficient and safe working, living and recreational environment for all Victorians and visitors to Victoria (Planning and Environment Act 1987; s4(1)(c))*
- *The transport system should provide a means by which persons can access social and economic opportunities to support individual and community wellbeing including by (a) minimising barriers to access so that so far as is possible the transport system is available to as many persons as wish to use it (Transport Integration Act 2010, s8); and*
- *The transport system should actively contribute to environmental sustainability by (b) avoiding, minimising and offsetting harm to the local and global environment, including through transport-related emissions and pollutants and the loss of biodiversity (Transport Integration Act 2010; s10).*

As delegated legislation, the State Planning Policy Framework seeks to ensure that planning policies and practices:

...integrate relevant environmental, social and economic factors in the interests of net community benefit and sustainable development. (SPPF; Clause 10.02)

The EES does not adequately demonstrate that these objectives are achieved through the project as proposed.

Thank you for the opportunity to comment on the Westgate Tunnel EES and proposed Planning Scheme Amendment. PIA Victoria seeks an opportunity to expand on this submission at the Inquiry and Advisory Committee hearing.

Yours sincerely,



Laura Murray RPIA
Planning Institute Australia, President Victoria