

Submission Cover Sheet

West Gate Tunnel Project IAC

Sub no: **387**

Request to be heard?: Yes

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File Ref: PF17/276241– E67241/17



10 July 2017

West Gate Tunnel Project Inquiry and Advisory Committee
Department of Environment, Land, Water and Planning
Online Submission: <https://engage.vic.gov.au/west-gate-tunnel-project>

To Whom It May Concern

CITY OF PORT PHILLIP OFFICER'S SUBMISSION ON THE WESTGATE TUNNEL ENVIRONMENTAL EFFECTS STATEMENT (EES)

Thank you for providing the opportunity for Port Phillip City Council (Council) to provide input to the Projects Advisory Committee on the Westgate Tunnel Project (Project) EES. The short 30 business day timeframe for submitting comments on the ESS has not allowed Council officers sufficient time to seek formal endorsement of this submission at a Council meeting prior to the deadline, nor engage with the local community.

As a result we propose a two-stage submission process as follows:

1. Officer submission on Monday 10 July, to meet the closing date for submissions (today)
2. Council will consider formal endorsement of the submission at an Ordinary Meeting of Council on 19 July 2017. This updated and endorsed submission will thereafter be submitted, to replace the officer submission.

Council officers have structured this submission across four key parts:

Lack of Project justification and rationale

A transport project that doesn't stack up that means less Victorian Government funds for effective responses to a growing city

Immediate impact of Westgate Tunnel Project

Limited benefits for the City of Port Phillip and Fishermans Bend

Transport Demand Management (TDM) measures

A lack of transport demand management measures proposed on Victorian Government roads network to 'lock-in' capacity for high value people and goods movements

Broader, longer term impacts of the Project

Short term traffic gain, longer term Melbourne pain

An executive summary is provided overleaf.

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Executive Summary

The Project modelling shows that its' benefits for the City of Port Phillip will be short lived and won't be the 'congestion buster' that is being promoted. Other projects and policies can deliver more sustainable long term benefits, better accessibility for users of the corridor and better freight access, while having less negative impacts.

The cost of the Project is estimated at \$5.5B, which is anticipated to be largely funded through a Victorian Government grant and extension of the existing CityLink toll contract.

The \$5.5B cost of the Project represents a significant opportunity cost for Melbourne and its future legacy of liveability, especially for the Western suburbs of Melbourne and the Fishermans Bend Urban Renewal Area.

These areas are going through rapid population growth with a lack of high quality public transport routes and frequent services that limits modal change. The \$3B funding that the Victorian Government is contributing to the Project could be redirected to bringing forward catalytic extensions to the public transport network such as the 'Melbourne Metro 2'.

The forecast benefits of the Project to achieve a major east-west commuter capacity boost for residents of both the Western suburbs and Australia's largest urban renewal precinct in Fishermans Bend can be achieved through bringing forward delivery of Melbourne Metro 2.

Council can see that Victorian Government funds proposed to be invested in the Project could be better spent in bringing forward:

- Locating residential development near employment hubs helping to create the 20 minute neighbourhood outlined in *Plan Melbourne*;
- Bringing forward the construction of the 'Metro 2' project linking Clifton Hill, the CBD, Fishermans Bend to Werribee increasing train capacity to the Western suburbs;
- Construction of the two proposed tram lines to Fishermans Bend, providing a catalyst for redevelopment of the area as mixed use.

1. Lack of Project Justification and Rationale

While it is accepted that the Project will help address congestion in the short term after completion in 2022, Council is concerned that the Project has not adequately factored in the impact of induced traffic demand when assessing the overall benefits of the Project. The Project documentation shows a Benefit Cost Ratio of 1.3:1, but the benefits are drawn from improvements to traffic conditions on distant parts of the freeway network, such as the Monash Freeway as distant as Berwick. Analysing the Westgate Tunnel component of the Project, the Benefit Cost Ratio is 1.1:1.

There is also concern that the proposed long term benefits will not materialise and as a result whether this is the most effective transport infrastructure response to transport people and goods. Council believes that induced demand will have a flow on effect to the wider road network as more car trips are made on the surrounding road network. Adjoining roads such as the Tullamarine Freeway, Monash Freeway, inner city streets and arterial roads in the City of Port Phillip are already congested and the Project will place further stress on these roads and the livability of the surrounding neighborhoods.

Induced traffic demand is the phenomenon that after a new road is constructed or capacity expanded that more people will drive or existing drivers will now travel further. Traditional traffic modelling and economic appraisals for the Project falsely assumes that there will be no new trips generated when in reality new and longer trips are generated because of the extra capacity provided thus negating any of the congestion improvements as shown in Figure 1.

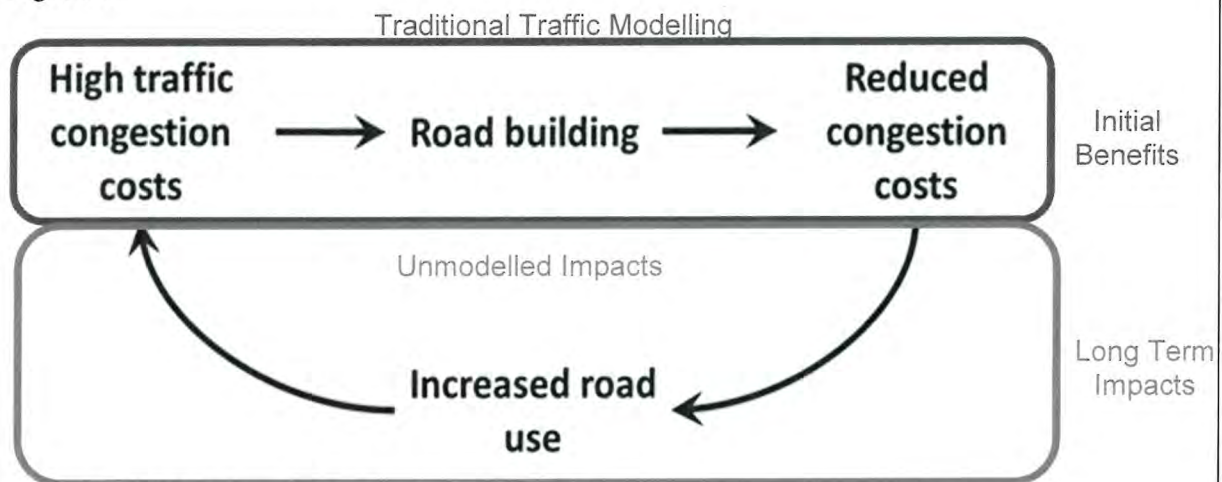


Figure 1: Induced Traffic Demand Flow Chart

Given a key pillar of the Project rationale is to achieve better freight access to Swanston Dock, it is curious that the Project does not provide a detailed options assessment of rail freight connectivity to realise some of these benefits, with less negative impacts.

Council recently adopted its *Council Plan 2017-27*, with the second of six strategic directions to create a city that is connected and easy to move around. In doing this Council's efforts over the above period will be directed to realising three outcomes:

- 2.1 An integrated transport network that connects people and places
- 2.2 Demand for parking and car travel is moderated as our City grows
- 2.3 Our streets and places are designed for people

The Project as proposed does not align with various Council policies such as:

- The *Council Plan 2017-2027*, which has one of the 6 key directions relating to transport accessibility. It states that 'demand for parking and car travel is moderated as our city grows'. The proposed Project promotes and induces increased car travel, thus compromising the ability to deliver the above outcome, whilst also reinforcing the role of the transport network being to provide for cars rather than supporting making our City's streets and places for people.
- Council's 'Road User Hierarchy' in which walking, bike riding and public transport are the highest priorities, whilst the Project is prioritising moving cars.
- The Project will use Victorian Government funds that could be better used on improving public transport services in the Western suburbs and bringing forward extensions to the public transport network and service provision into the Fishermans Bend Urban Renewal Area. The Project will encourage driving and contribute to social inequity with people who are carless with the old, young or disadvantaged unable to benefit.

Council's policy settings are aligned with the objectives of the *Transport Integration Act 2010*. When assessing the decision making principles with this legislation, the Project does not appear to be supported.

2. Immediate Impact of the Project – Limited Benefits for the City of Port Phillip

The Project documents provide little detailed information on its immediate and measurable benefits when the construction is proposed to be completed in 2022. The majority of the data provided in the ESS documentation on the benefits of the project are based on figures comparing the 'do nothing' and 'Project completed' scenarios for the year 2031 approximately 10 years after the project has been completed. The Project documents do highlight the general benefits to the community of:

- 20% capacity improvement across the Yarra River and Maribyrnong River;
- Reduced travel times for vehicles along the corridor of between 8-15 minutes in 2031;
- Improved freight connection to Melbourne Port, particularly Swanson Dock to the Westgate Freeway and Tullamarine Freeways; and
- Improvements to bike riding and walking facilities along the Westgate Tunnel corridor.

The Victorian Government has released *Fishermans Bend Vision*, which establishes a clear direction for planning work and delivery in the urban renewal area and *Plan Melbourne* a guide for how the city will develop over the next 35 years. The key transport goals and policies are:

- 'Target for 80% of transport movements to be made by Public Transport, Walking or Cycling';
- 'An integrated transport strategy including cycles paths tram lines and an underground rail line';
- Transport planning is being informed by a Road User Hierarchy that promotes sustainable transport and discourages car usage; and
- The creation of 20 minutes neighbourhood where residential development are located near employment hubs and community services helping promote short trips, primarily by walking or bike riding.

3. Transport Demand Management (TDM) - Locking in capacity on existing routes

The current level of traffic congestion on the Westgate Freeway passively moderates the demand for car travel by creating a 'cost' in time and convenience for people who wish to drive, especially at peak times. It encouraging some people to use a different travel mode particularly public transport, travelling outside of the peak periods or on a different route. Taking into account the induced demand, the Project does not currently include any measures to lock-in the capacity on the existing freeway and road network for essential and higher value trips.

As the freeway network is forecast to become more congested into the future, mechanisms to better manage travel demand and provide alternative methods to move people and goods should be investigated and implemented on the declared road network. Alternative methods for TDM are:

- Investigate the introduction of new bus services over the Westgate Bridge to connect the Western suburbs directly to Fishermans Bend;
- The additional capacity provided along the Tullamarine, Westgate Bridge and Tunnel is locked in with the provisions for 'truck only' lanes that could potentially be shared with other high value vehicles such as buses. These vehicles provide the highest economic benefit for Victoria and operate best when separated from cars. This will be especially pertinent with the Port of Melbourne freight volume tripling to the year 2050, requiring increased priority and road capacity for goods transport.

4. Longer Term Impacts

Traffic modelling completed for the Project indicates that there will be a redistribution of existing traffic once the Project is operational with parallel routes carrying less traffic. The modelling indicates while the proposal would remove some traffic from the Westgate Bridge, the improvement will be short term and the extra capacity absorbed within 5 year of the works completion as shown overleaf in **Figure 2**.

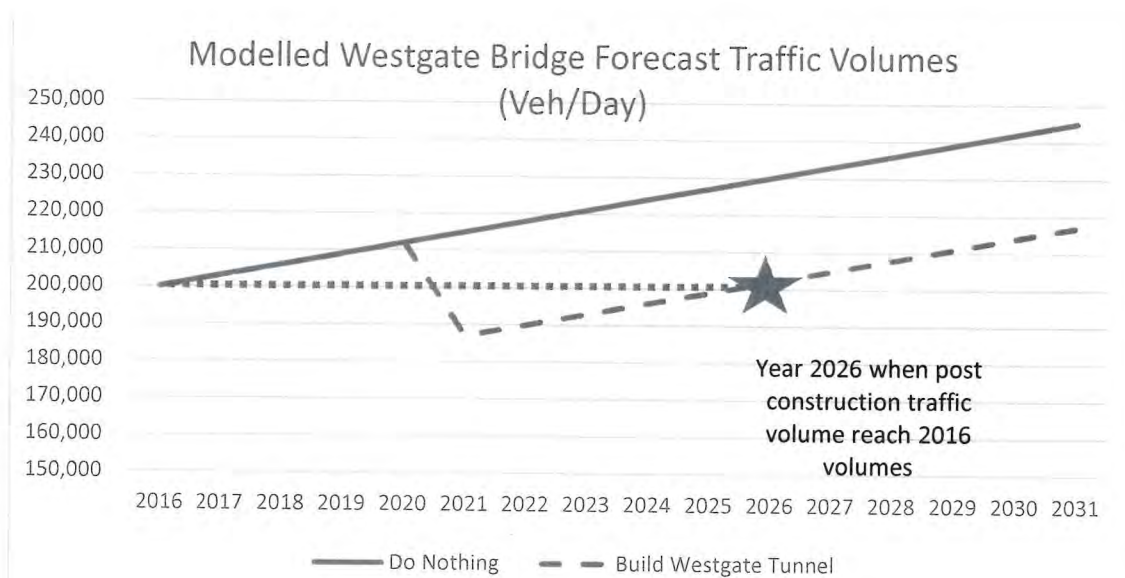


Figure 2: Traffic Volumes over the Westgate Bridge with a ‘Do Nothing’ and the proposed Westgate Tunnel Project.

Taking a broader view of the likely impacts of the Project, the effects include:

- Air quality and climate change impacts through increased air pollution and greenhouse gas emission generated by induced car travel and longer car travel times from 2026 onwards;
- The loss of valuable, usable inner city land within the E-Gate precinct for mixed use redevelopment through the Project’s eastern freeway interchange;
- Long term impact to the community’s local amenity and severance including more cars on arterial roads, reduction in public green space, noise, reduced public realm outcomes and damage to streetscape;
- Ingraining car based travel leading to reduced physical activity and higher levels of obesity and preventative health costs for our community;
- Preserves social inequity amongst the different regions of metropolitan Melbourne.

Currently there is limited funding for infrastructure projects in Victoria. Providing approximately \$3B in funding for the Project will likely reduce the available funding or delay the implementation ‘Melbourne Metro 2’ rail project and the two new Fishermans Bend tram routes. These proposals would compete with the Westgate Tunnel Project along similar corridors. Melbourne Metro 2 will connect the CBD to Fishermans Bend and onto Werribee and the two tram lines would connect Fishermans Bend to the Central City, dramatically increasing capacity along the Werribee Corridor. The Fishermans Bend tram routes are necessary to provide a connection to the City and deliver planned level of renewal and activation.

Should you have any questions in respect to this Council officer submission, please contact John Bartels, Coordinator Sustainable Transport via the phone number above or via email: john.bartels@portphillip.vic.gov.au.

Yours faithfully,



CLAIRE FERRES MILES
General Manager Place Strategy & Development

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31 July 2017

Ms Greta Grivas
West Gate Tunnel Project Inquiry and Advisory Committee
Planning Panels Victoria
Department of Environment, Land, Water and Planning
C/o: westgatetunnelproject.ppv@delwp.vic.gov.au

Dear Ms Grivas

ENDORSED CITY OF PORT PHILLIP COUNCIL SUBMISSION TO WESTGATE TUNNEL ENVIRONMENTAL EFFECTS STATEMENT (EES)

Further to submitting on 10 July 2017 a Council Officers' submission on the above EES, this submission was considered at the 19 July 2017 Ordinary Council meeting.

As a result Council resolved to:

"1.1 Endorse the Officer's submission, included as Attachment 1 dated 10 July 2017, to the West Gate Tunnel Project Inquiry and Advisory Committee on the environmental effects of the proposed Project.

1.2 Notes:

- 1.2.1 *City of Port Phillip's Environmental Effects Statement (EES) submission demonstrates Council's commitment to minimising the negative impacts of the construction and operation of the Project on the community;*
- 1.2.2 *There is a lack of justification or rationale for implementing the Project and it will ultimately reduce the funding pool for other, more critical projects, such as Melbourne Metro 2 and trams to Fishermans Bend Urban Renewal Area (FUBRA);*
- 1.2.3 *The Project does not meet the goals of the State Government's Plan Melbourne or Fishermans Bend Vision documents prioritising sustainable transport and creating 20 minute Neighbourhoods;*
- 1.2.4 *The Project should include Transport Demand Management measures to lock in capacity for high value goods and people movement such as freight and public transport.*
- 1.2.5 *When operational, the Project will provide a short term decrease in the number of vehicles using the West Gate Freeway Bridge but will ultimately encourage driving and provide little long term benefit for commuters. The project will reduce air quality, add greenhouse gases, result in loss of valuable inner city development land, reduce liveability, reduce the amount of in quality open space and increase regional transport inequality".*

A copy of the Council endorsed submission is attached to this letter. Please note this is unchanged from the Council Officer submission dated 10 July 2017.

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Should you have any questions in respect to this letter, please contact John Bartels, Coordinator Sustainable Transport via the phone number above or via email: john.bartels@portphillip.vic.gov.au.

Yours sincerely



CLAIRE FERRERES MILES
General Manager Place Strategy And Development

Encl.