

Submission Cover Sheet

West Gate Tunnel Project IAC

Sub no:

195

Request to be heard?: No,

Full Name: Carmen Largaiolli

Organisation:

Address: [REDACTED]

Affected property:

Attachment: West_Gate_Tunn

Comments: Please refer to attachment pdf.

West Gate Tunnel Project Environmental Effects Statement (EES) Submission

Response to:

Volume 2: West Gate Freeway

Transport; Human health and amenity, community.

Volume 3: Tunnels

Transport; Human health and amenity, community.

1. West Gate Freeway

- a) Complete truck ban on Millers Road. Ban trucks from exiting and entering at Millers Road. According to the modelling, thousands more trucks will potentially utilize Westgate Freeway, Millers and Geelong Roads. Residents of Brooklyn already have major issues accessing Millers Road and feel hemmed in by these three major thoroughfares.
- b) Lack of freeway access points at Grieve Parade. Grieve Parade section of the West Gate Freeway needs to be upgraded to incorporate additional freeway entry points and more comprehensive integration with Western Ring and Geelong Roads. This upgrade would be needed regardless of the project.
- c) Brooklyn is already the most polluted suburb in Victoria, and one of 12 major Australian pollution hot spots¹. It has been exposed to decades of high levels of all forms of pollution – dust, odour and noise. The community has suffered a huge loss of health and amenity due to this exposure.
- d) In Brooklyn, the PM10 particulate pollution has been identified as a major pollutant and it has been well documented² that levels have exceeded WHO standards on many occasions. The project will not only contribute to existing levels of PM10, but also add an increased level of PM2.5 – the more sinister finer particulate matter that reaches right into the human lungs.
- e) The proposed location for the Western exit portal of the tunnel will be adjacent to planned residential communities at both the Bradmill and Don's Smallgoods sites. In addition, as soon as traffic exits the tunnel it just about arrives at Altona North and Brooklyn residential areas, where both suburbs will then be fully exposed to above ground traffic, copping the full brunt of pollution as well as the unfiltered emissions emanating from the Western stack.
- f) The West Gate Tunnel project EES has utilized PM data collected by the EPA air monitoring station at Footscray, which does not accurately reflect the real PM conditions as measured by the Brooklyn air monitoring station located at Brooklyn reserve, which has been operational for almost 10 years. Data is collected by EPA and shows a history of PM10 breaches. Therefore, the EES air quality modeling is distorted for the areas closest to the West Gate Freeway at Brooklyn, Altona North and Yarraville since it has not used historical data from the closest air monitoring station (Brooklyn).
- g) Particulate matter in outdoor air pollution is designated a Group 1 carcinogen by the International Agency for Research on Cancer (IARC).
- h) The **PM standard** used in the EES air quality modelling is **incorrect**. **Figure 13-1 shows the standard as concentration 60. The applicable standard is 50 micrometers per cubic metre.** This does not instill a great deal of confidence for citizens to trust the contents of this EES.
- i) Residents of Brooklyn would incur increased levels of noise pollution as a result of this project.

¹ Environmental Justice Australia "Clearing The Air – The Laws We Need" July 2014

² EPA – Brooklyn air pollution reports

- j) The EES is an extremely long document to navigate for private individuals and it's unfair for the State Government to expect the public to digest this level of detail in such a short timeframe.

2. Tunnels

Both the proposed emission stacks are located in the western suburbs. The works application proposes there is no justification for air pollution control technology to be installed, stating "the measures adopted should be cost-effective and in proportion to the significance of the environmental problems being addressed". This is totally unacceptable to me and my family. Filtration technology is available in this 21st century and it is incumbent on the government to protect its citizens to the fullest. Simple and clear! Further, the western suburbs has carried the burden of Melbourne's worst pollution for decades, especially our suburb of Brooklyn, and nothing less than the utmost safety is called for here. The residential areas of Brooklyn and Altona North are further exposed to the above ground traffic travelling on the West Gate Freeway and the resulting pollution.

3. Conclusion

- a) Air pollution and health impacts will continue to worsen in the inner west if this project goes ahead.
- b) Truck rat running will continue – it will just move from one area to another.
- c) The health status of Australian trucks is woeful as most breach standards due to inadequate and poor maintenance, and old technology.
- d) Government:
 - i) Needs to control emissions and introduce legislation that encompasses green technology for all vehicles (cars and trucks) as a means of reducing air pollution. For example, France has just announced a full ban on the sale of petrol and diesel vehicles by 2040.³ However, we need to act much sooner.
 - ii) Increase the use of rail transport intrastate/interstate and reduce the dependency on trucks
- e) This project is a bad concept and will not solve congestion. There are better ways forward for our society. Academics on "The Conversation" have also criticized the EES, stating: "There are numerous reasons to be suspicious of the modelled outcomes. For one, these models are notoriously unreliable."⁴

Carmen Largaiolli & family



³ BBC news article: <http://www.bbc.com/news/world-europe-40518293>

⁴ <http://theconversation.com/impending-traffic-chaos-beware-the-problematic-west-gate-tunnel-forecasts-79331>