Submission Cover Sheet

Sub no: **160**

West Gate Tunnel Project IAC

Request to be heard?: No

Full Name: Chantelle Augello

Organisation:

Address: [redacted]

[redacted]

Affected property:

Attachment: Environmental_Ef

Comments: see attachment

Environmental Effect Statement – Submission

New Street, South Kingsville Construction Site & Access

New Street is a residential street in South Kingsville, it is bound by Blackshaws Road and the Westgate Freeway. The west side of the street is currently industrial zoned and forms part of Precinct 15. Most businesses along the street have been closed or knocked down to make way for future development with less than a hand full currently active.

Residents of New Street have become increasingly concerned after discovering that the North end of New Street will be acquired and converted into a construction site. It is also worrying that the construction site will be accessed via New Street for the 5years construction timeframe.

This conflicts with Technical Report A – Part 2 (Page 9) which states that the Western Distributor Authority (WDA) will "Restrict the number of local roads to be used for construction-related transportation to minimise impacts on amenity"

The EES again states the WDA's desire to not use residential street in Technical Report A – 8.3.3 Mitigating measures

Table 161: Mitigating measures: tunnel construction

Potential impact	Possible mitigation measures	Additional treatments
Construction	• Haulage to be minimised on residential roads. Where possible, alternate routes must be used. • Construction haulage shall be on arterial roads wherever possible. • Haulage along local residential roads shall not be permitted at night.	Advanced notice to all affected road users. No haulage of materials during peak periods.

In the EES, there is no data or study on current or future traffic volumes on New Street like there is for other nearby streets. Throughout the EES It is unclear how many trucks and cars will be using New Street:

- Technical Report A – 8.1.1 (Construction sites forecast traffic) states 140 cars and an unknown amount of trucks. (See Appendix 1)
- Technical Report A – 8.2.1 (Proposed construction traffic routes) Figure 219: Average number of heavy vehicle round trips per day, states that 50 to 100 trips will be on New Street (see Appendix 2)

New Street is not fit for a construction traffic route:

- New Street is a small residential two-lane street, cars park on the West and East side of the street to access their homes (effectively making it a one lane street).
- When driving down the street you must pull into spare car spaces to allow oncoming traffic through before you proceed. This has caused people to park on the nature strips to allow more room for cars.
  Click here for video: https://youtu.be/IP_x6SdtMeg
  (see photos of street in Appendix 3)
- New Street has long been a "rat run" for nearby residents in Newport and Altona North who want to access the Westgate freeway and the street cannot handle any further congestion
- The street has 20 speed humps along it which are worn down by the already large amount of traffic, however these humps cause a load shuttering noise if trucks drive down the street
- New Street houses a large number of sensitive residents on the East side of the street, including Children and the elderly. Neither of these groups deserve to be disrupted by construction works
- Families transporting children that attend the South Kingsville Pre-School and St Margaret Mary's Primary Schools use New Street on their drop-off route
- Additional cars and trucks will impact the few businesses remaining on the street. Some businesses deal direct to the public (e.g: Amira Foods and Unique Auto Prestige) and rely on street parking for their customers, other businesses (e.g: Office Fruit) transport goods throughout Melbourne and need easy and quick access to and from their business.

Recommended alternative routes

1. Freeway ramps
   Build two temporary ramps from the freeway and onto the construction depot.
   This alternative entrance will mean that New Street, Blackshaws Road and Millers Road residents will be less effected by construction trucks and vehicles. This will reduce any impact or risks to resident's health and safety and ensure the longevity of our roads, our properties and their values. This would also go towards achieving the WDA's aim of keeping trucks off residential streets.

2. <u>Use Kyle Road, Altona North</u>

   Although Kyle Road is also a residential street it is much more suitable for heavy vehicles (see below street comparison table).

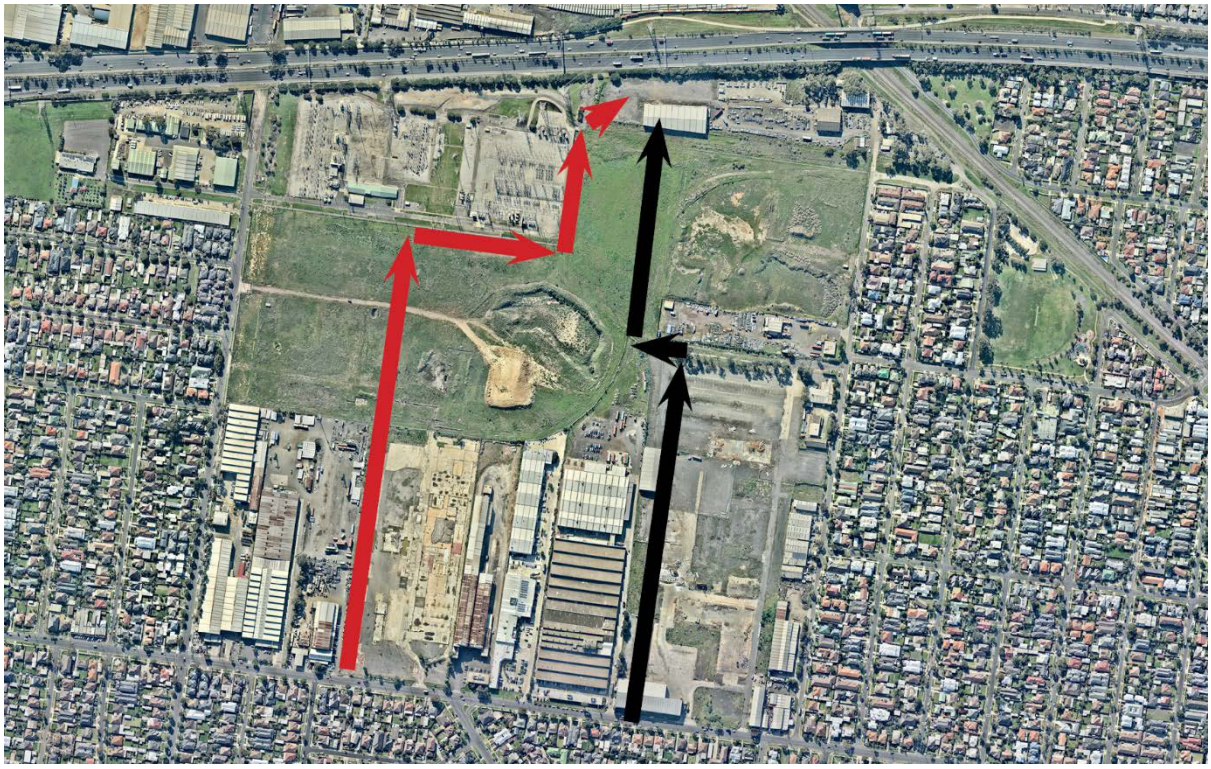
   Using Kyle Road would also mean that the WTP impact is evenly spread throughout the area. The construction site can be accessed through the Electricity board to the North of the street, which has a flat concrete road through to the end of the site. There is a small (180m approx.) flat area between where the electricity board stops and the construction site begins which would need to be constructed into a usable road. (see photos of Kyle Road in Appendix 4)

Street Comparison	New Street	Kyle Road
Lanes	2 lanes	4 lanes
Speed humps	20	None
"Rat Run" or through road to freeway	Yes	No
Zoned Residential/Industrial	Yes	Yes
Active Businesses	6	1

3. <u>Access Though Precinct 15</u>

   Work with the Hobsons Bay Council and the VPA (groups who are currently working on the development of precinct 15) to build roads that could be used as part of the development and could be temporarily used to access the constructions site.

   The map below shows two options for roads, both travelling through sites that have recently been demolished and both avoid areas of land that require filling.



Air Quality

Hobsons Bay has long been synonymous with poor levels of air quality and pollution, with one of the municipality's suburbs holding the infamous title of Melbourne's most polluted suburb. New Street residents' have concerns relating to the project's lack of monitoring ultrafine particulate matter (UFPM), PM 0.1 or smaller.

In 2012 the International Agency for Research on Cancer classified diesel engine exhaust as carcinogenic to humans. The greatest contributor to particles in diesel exhaust by number is UFPM and yet the project will not be monitoring UFPM at all, and does not take a baseline measurement.

A study titled [2] "Health Impacts of Ultrafine Particles" details the health impacts of these harmful emissions, which include;

- Premature mortality;
- Aggravation of respiratory and cardiovascular disease (as indicated by increased hospital admissions and emergency room visits, school absences, work loss days, and restricted activity days);
- Changes in autonomic nervous system function and cardiovascular risk factors such as blood pressure, C-reactive protein or endothelial dysfunction
- Changes in systemic blood markers
- Changes in lung function and increased respiratory symptoms;
- Changes to lung tissues and structure; and
- Altered respiratory defence mechanisms

A study titled [3] "Clearing the air" by Environmental Justice Australia states "3,000 Australian's die preventable deaths each year from air pollution"

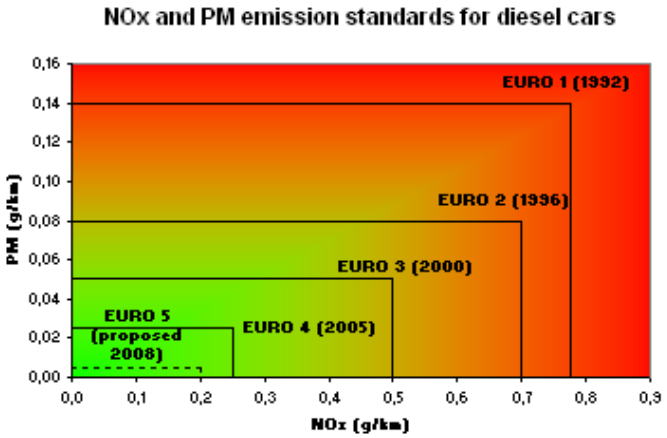
Requests

- The temporary pollution monitoring station located at Donald McClean reserve is to be made permanent and become an EPA administered and monitored site. This monitoring station should be used to ensure source pollution from the road does not exceed the EPA Victoria PM 2.5 and PM10 air quality standards. The data recorded at this site should also be available to the public.
- Take a baseline measurement of ultrafine particles pre project commencement and continue to monitor these particles from monitoring station.
  Without a baseline measurement there will never be a way of knowing the full impact of this road project on the health of nearby residents and Melbourne as a whole
- Mature trees that are to be removed for construction need to be replaced with new trees along the freeway corridor and noise walls to offset pollution

<u>Ventilation stack filtration</u>

Residents are concerned about the lack of a filtration system in the ventilation stacks.

Traffic modelling shows that there will be between 55,000 and 67,000 vehicles per day travelling through the tunnel, this includes between 13,200 and 16,200 trucks. Many of these trucks don't even meet the current Euro 5 emission standards and are thus very high polluters (see below graph). Most of the pollution from these trucks will be funnelled out of the tunnel through two ventilation stacks. The current plan is that pollution will be dispersed naturally throughout the inner west of Melbourne.



Considering the current poor levels of air quality in the inner west of Melbourne it is difficult to understand why the project would not use world's best practice in ensuring that these two point sources of pollution are filtered. It is not enough to comply with the current Victorian EPA regulations as Australia lags behind the European and USA regulations for air pollution 3.

There are good example in the world where this has been done successfully. In the 6km of tunnels constructed in Madrids M-30 four different tunnel filtration systems have been used, providing good opportunity to compare systems. Work undertaken by Madrid Calle 30, the company who operates and maintains the M-30 including filtration in the tunnels has found that about 90% of PM2.5 and 85% of PM1.0 can be removed by the most efficient filtration system (the CTA – Norwegian installations.

Requests

- Install a world class filtration system in the two ventilation stacks

<u>Break in Noise Walls between New Street and Kyle Road</u>

Pollution and noise pollution is a genuine issue that is already affecting New Street residents. Noise affects human health in both physiological and psychological ways including disturbing sleep, rest, study and communication.

Most of the freeway corridor will receive new and upgraded noise walls that are designed to cope with the forecasted traffic change, however there is break in the noise wall between New Street and Kyle Road. This break will leave Precinct 15, the Brooklyn Terminal Station and the proposed 3ha park open to the freeway.

Evidence from the 2016 study titled [1] "Influence of solid noise barriers on near-road and on-road air quality" proves that a well-constructed noise barrier will reduce pollution by 15-50%. The study also shows that the pollution reduction is highest within the first 50m from the road but improved pollution as far as 300m away (the proposed 3Ha park is 15m from the freeway).

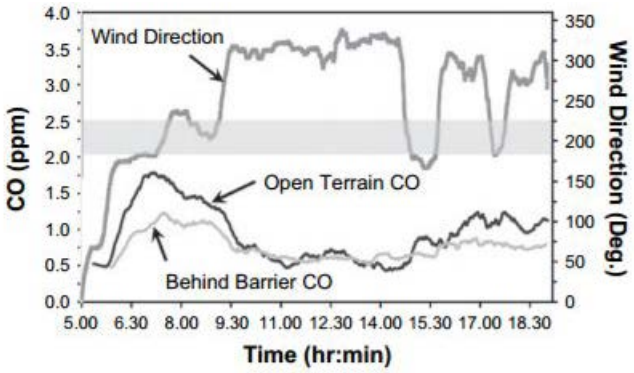
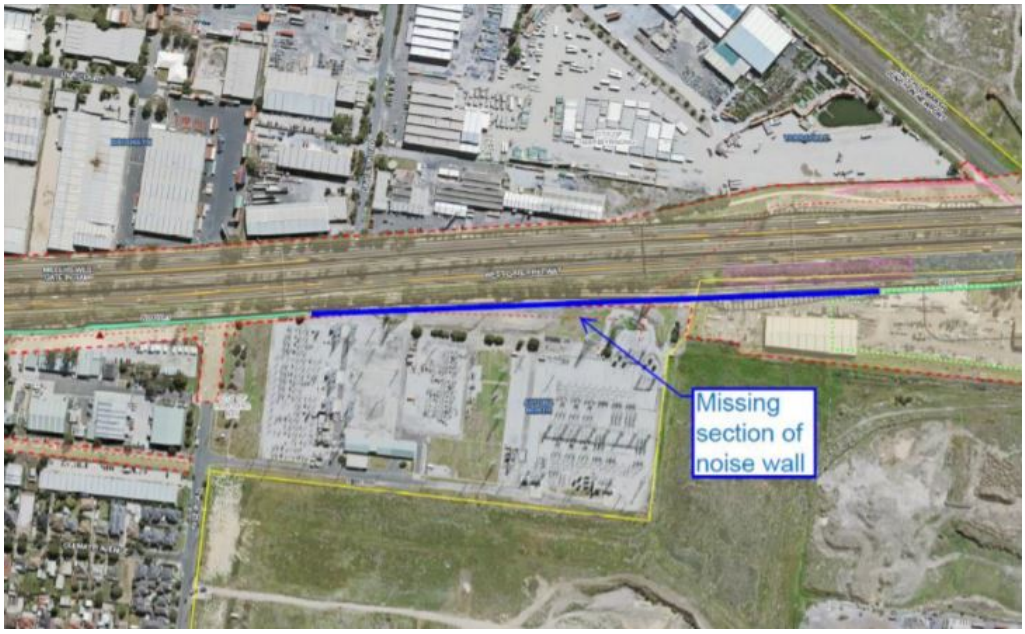


Fig. 2. Comparison of CO time series measurements from ORS at an open field and behind a noise barrier. Measurements were taken 10 m from the road on August 3, 2006. A wind direction of 206 degrees represents winds normal from the road.

Request

Extend the noise walls approximately 500m to form a continuous wall along the freeway. There is merit in extending the sound walls in this area because they will;

- Prevent worsening noise and pollution impacts to current residents of New Street and Kyle Road
- Prevent noise and pollution impacts on the future precinct 15 residents
- Help meet the projects objective for traffic noise levels of 63db(A) for residential and community buildings along the projects corridor
- Reduce pollution health risks by to current and future residents, and sensitive residents visiting the park
- Create visual consistency through the freeway corridor
- Mask direct views to the Brooklyn Terminal Station, which will improve the freeway experience (the terminal station is currently masked by trees)
- Create a safer environment for children and families visiting the new 3Ha park
- Increase the desire for people to visit the new park (by reducing noise and freeway views)



Traffic and Urban Renewal Sites

Traffic projections:

The project is conservatively estimated to induce an additional 37,000 vehicles per day onto the West Gate Freeway between Millers Rd and Melbourne Rd in 2031 (compared to no WGT project). This includes an assessment that this will include an additional 15,000 truck per day in 2031. This table produced by Hobsons Bay City Council details the estimated traffic volumes in 2031 with the project.

Table 2: **Differences in traffic volumes between the project and no project in 2031**

Location	Change in daily traffic numbers in 2031 due to project	Change in daily truck traffic numbers in 2031 due to project
Millers Road (north of Freeway)	+ 4500	+ 7000
Millers Road (south of Freeway)	+ 600	+ 800
Melbourne Road	+ 800	+ 100
Hyde Street	+ 1500	+ 1500
Douglas Parade	0	+ 700
Simcock Avenue	+ 1500	+ 800
Blackshaws Road (east of Millers Road)*	+ 600	- 900
Blackshaws Road (west of Millers Road)*	- 400	+ 700
Hudsons Road*	- 200	- 300
Grieve Parade (south of Freeway)	+ 600	- 600

Truck bans and curfews

The table above shows that new tolls along the freeway, in the tunnels, along with the introduction of a truck bans in Yarraville are expected to direct more traffic and trucks onto Hobsons Bay roads. E.g: Kororoit Creek Road, Blackshaws Road, Mason Street, New Street and North Road.

These roads are all likely to experience higher traffic volumes resulting from toll avoidance and

avoiding truck bans. To protect residents, amenity and to not allow trucks to avoid tolls it is recommended that truck bans and curfews be introduced on the below streets;

- Blackshaws Road
- Mason Street
- New Street
- Hudsons Road
- North Road
- High Street
- Kororoit Creek Road east of Millers Road.

Also a night and weekend truck curfew introduced in Millers Road between Kororoit Creek Road and Geelong Road as part of the Project. Noting that local businesses with an origin/destination point within these areas would be exempt from these truck bans.

Urban renewal sites:
The EES documentation references Urban Renewal sites multiple times but when referring to forecast traffic numbers the future residents of Precinct 15, Bradmill and the Caltex site on Blackshaws road are not included in the data. These mass developments will see the biggest increase of people and traffic the inner west has seen. Missing even one of these developments from the EES forecasting (e.g: precinct 15) means some 6,000 residents and 9,000 cars are unaccounted for.

Conclusion:
Recently the VPA released the plans for Precinct 15 for community engagement and works have begun on New Street to fill land that was previously used as a quarry. B Double trucks have already started bustling down the street carrying loads of rocks and fill.

New Street residents are keen for the precinct 15 development to get underway and that are eager for our miss-used street to gain some respect amongst the community. The residents ask that all plans for freeway construction sites and access be considered in context to what has started and will long continue within the precinct. I believe it would be unjust and discriminatory to allow such impacts to burden one small residential street.

New Street residents are an unwavering group of individuals. We seemingly put up with the local traffic, freeway noise and industrial wasteland views, all for the future promise of living the great Australian dream in the suburb of our dreams.

I invite anyone working on this project to please visit New Street so you can truly understand how this small street could not cope under the proposed pressure. I see great potential in this street and am passionate about preserving its amenity, residents and future prospects.

Appendix 1

Technical Report A – 8.1.1 Construction sites forecast traffic

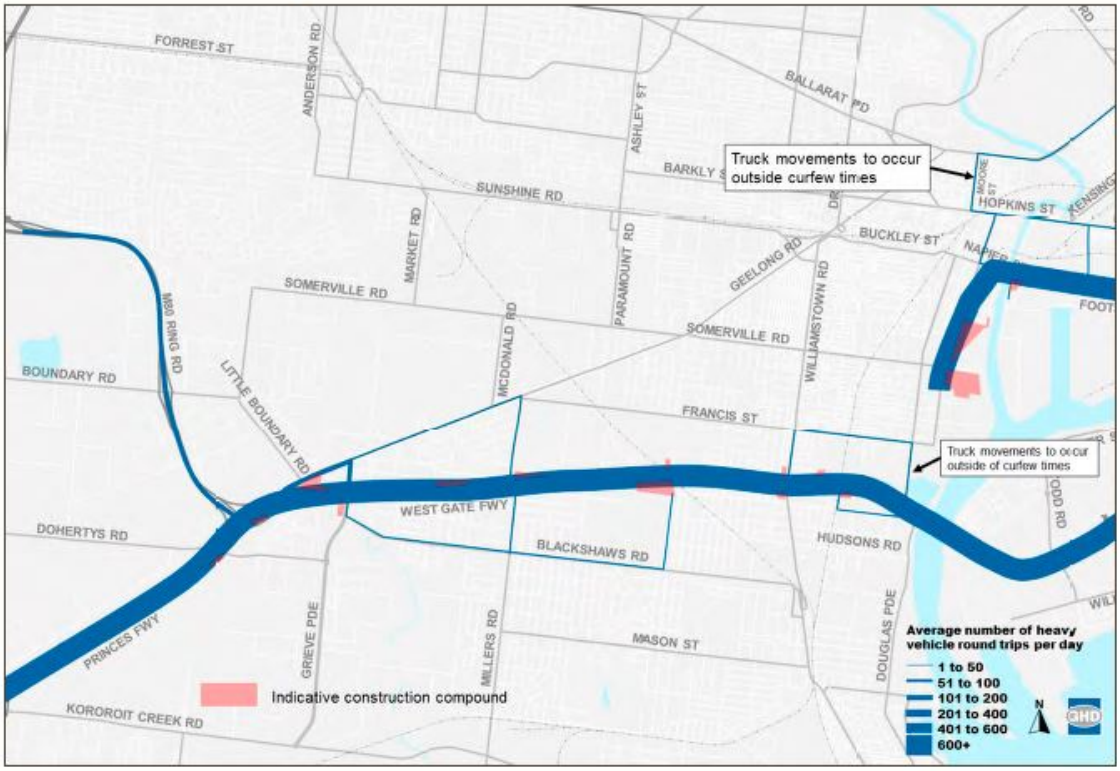
Table 155: Summary of construction site forecast traffic generation

Location	Peak daily cars (inbound)	Peak daily trucks (inbound)	Access route to worksite
Little Boundary Road compound	950	100	Grieve Parade and West Gate Freeway
Southern Tunnel Portal compound	140	Unknown	West Gate Freeway and Blackshaws Road
Williamstown Road compound	150	Unknown	Unknown – most likely Williamstown Road
Simcock Avenue compound	150	25	Francis Street and Simcock Avenue
Northern tunnel compound	200	300	Whitehall Street and Footscray Road
Footscray Road compound	595	25	Footscray Road and CityLink
E-Gate compound	950	100	Footscray Road and CityLink

Appendix 2

Technical Report A – 8.2.1 Proposed construction traffic routes

Figure 219: Average number of heavy vehicle round trips per day: West Gate Freeway



Appendix 3

New Street Images – 6pm Tuesday 21/6/2017

"Rat Run" to and from the freeway

RHS car is parking, leaving 1 lane for traffic

Appendix 4

Kyle Road Images - 6pm Tuesday 21/6/2017

Wide Street – 3 lanes for traffic

References

1. Baldauf, R. W., Khlystov, A., Isakov, V., Thoma, E., Bowker, G. E., Long, T., & Snow, R. (2008). Impacts of noise barriers on near-road air quality. Atmospheric Environment, 42, 7502–7507.
   Link: http://escholarship.org/uc/item/1ch1q6wx

2. Prepared by Associate Professor Lidia Morawska, Professor Michael R Moore, and Dr Zoran D Ristovski
   The Australian Government Department of the Environment and Heritage
   Health Impacts of Ultrafine Particles
   Link: https://www.environment.gov.au/system/files/resources/00dbec61-f911-494b-bbc1-adc1038aa8c5/files/health-impacts.pdf

3. Clearing the air, Why Australia urgently needs effective national air pollution laws
   https://envirojustice.org.au/sites/default/files/files/Submissions%20and%20reports/Envirojustice_air_pollution_report_final.pdf