

Submission Cover Sheet

West Gate Tunnel Project IAC

Sub no:

434

Request to be heard?: Yes

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Affected property: Western Melbourne Metropolitan Region

Attachment: engage.vic.gov.au

Comments: LeadWest welcomes the opportunity to lodge the attached submission.

10 July 2017

Department of Environment, Land, Water and Planning

Online submission via www.planning.vic.gov.au/west-gate-tunnel-project-hearing

**SUBMISSION RESPONDING TO THE WEST GATE TUNNEL PROJECT
ENVIRONMENT EFFECTS STATEMENT**

LeadWest welcomes the opportunity to lodge a submission responding to the West Gate Tunnel Project Environment Effects Statement.

This submission reflects the input of LeadWest's member councils (Brimbank, Hobsons Bay, Maribyrnong, Melton, Moonee Valley, and Wyndham) and provides a regional perspective on the West Gate Tunnel Project Environment Effects Statement.

This should be read in conjunction with individual submissions by LeadWest's member councils.

LeadWest wishes to be heard at the Public Hearing.

Yours sincerely,



Craig Rowley
Chief Executive Officer
LeadWest



ABOUT LEADWEST

LeadWest is the regional organisation for Melbourne's west.

Focused on advocacy for the region, LeadWest is a nonpartisan, not-for-profit, membership based organisation.

LeadWest's objective is to foster and undertake actions that will support sustainable growth and development of Melbourne's west.

LeadWest was formed by the six local governments in Melbourne's west and they are joined in LeadWest's membership by major companies and other organisations, each with substantial operations or interests that are based in Melbourne's west.

LeadWest also has a growing number of affiliates, primarily not-for-profit organisations and each playing a significant role in our region.

You can access more information on LeadWest at www.leadwest.com.au

SUBMISSION EXECUTIVE SUMMARY

Ahead of the body of this submission to the West Gate Tunnel Project Environment Effects Statement (the EES), LeadWest wishes to highlight the insufficient time that has been provided for submissions to be made to this EES. LeadWest strongly suggests that more time should be made available for the community to properly consider and comment on such a voluminous document (approximately 10,000 pages) for a city-shaping project with long-lasting effects.

Notwithstanding this limited timeframe, LeadWest welcomes the opportunity to lodge a submission. This submission is provided in conjunction with separate submissions provided by councils within LeadWest's membership, including Hobsons Bay City Council and Maribyrnong City Council which represent the local communities that are most impacted by the project.

LeadWest recognises that following the decision not to proceed with the East West Link, the West Gate Tunnel is the Victorian Government's preferred solution to provide a strategic second road connection from Melbourne's west to points of traffic distribution around the City of Melbourne.

LeadWest notes that if the West Gate Tunnel proceeds, it will have implications for the timing and delivery of a future tunnel under Footscray connecting to the Western Ring Road.

LeadWest considers that both the northern corridor connection identified in the Eddington Study (which came to be described first as "WestLink" and then as the "western section of East West Link") as well as the southern corridor connection (embodied by the West Gate Tunnel Project) may be required to accommodate Melbourne's future transport needs.

LeadWest notes that Infrastructure Victoria has identified the future delivery of the “WestLink” in the 30-Year Infrastructure Strategy that it has recommended to the Victorian Government.

LeadWest does not oppose the West Gate Tunnel Project, as it is likely to provide some improvement in access to locations of high employment opportunity for residents of communities in Melbourne’s west; however, LeadWest urges the earliest possible reservation of the corridor for “WestLink” transport corridor which can serve both future road and rail transport infrastructure purposes.

Early reservation of a “WestLink” transport corridor will provide certainty to businesses in and adjacent to the corridor, which will facilitate further progress in the renewal of industrial areas, enabling business growth and provision of more employment opportunities within Melbourne’s west.

LeadWest also remains significantly concerned about a number of aspects relating to the West Gate Tunnel Project, including:

- Truck traffic displacement;
- Air quality reduction;
- Spoil management issues; and
- Community concerns

Truck traffic displacement

LeadWest notes the potential for the West Gate Tunnel Project (WGT) to result in a reduction of trucks on some key residential streets. In isolation however, the WGT is unlikely to be a permanent solution to the road freight management challenges in Melbourne’s west.

LeadWest argues that development of a freight rail system to get shipping container trucks off our metropolitan road system would strongly complement the outcomes sought from the WGT project and should be a key infrastructure objective of the Victorian government. We note that \$58 million remains unspent in Victorian Government forward estimates to progress development of a Port Rail Shuttle. We also note the Victorian Government has been investigating development of a Western Interstate Freight Terminal (WIFT) at Truganina.

LeadWest’s primary concern in relation to the West Gate Tunnel Project, and the Victorian Government’s announced accompanying truck bans, is the potential for displacement of truck traffic impacts from residential areas within the City of Maribyrnong to other areas, particularly those within the City of Hobsons Bay. The current design is highly likely to trigger toll and truck ban avoidance, generating significant adverse truck traffic impacts on the City of Hobsons Bay.

LeadWest’s view is that during construction, key earthworks and other construction activities should be carefully managed and coordinated with the projects being undertaken by the Melbourne Metro Rail Authority and Level Crossing Removal Authority. Coordination will ensure that construction traffic minimises impacts to the communities of Melbourne’s west, while also

minimising disruptions to businesses and people using the transport networks in Melbourne's west.

LeadWest urges the Victorian Government to provide an increase in public transport services, both train and bus services, throughout the construction period for the West Gate Tunnel Project. This will help to alleviate the increase in congestion and significant disruptions to road based transport associated with construction works. It will also help to promote a longer-term shift of commuter traffic from cars to public transport in communities that are at present highly car dependent due to poor public transport options.

Air quality reduction

LeadWest shares community concerns about the project's lack of monitoring of ultrafine air particles, and LeadWest takes the view that, given the long lifespan of the project and the profits it will generate through tolling, a world-class air filtration system should be included in the tunnel portal ventilation design.

LeadWest shares a view that communities in Melbourne's west should be future-proofed against port generated diesel pollution for decades to come. Consequently, LeadWest urges the project to take a precautionary approach to future-proofing surrounding communities and to undertake baseline monitoring of ultrafine particles. This is especially important near the ventilation stacks and the West Gate Freeway.

To ensure that the health of the impacted communities in Melbourne's west is protected, the project should commit to world's-best-practice for monitoring and minimising the impacts of ultrafine particles.

Spoil management issues

Management of spoil must ensure that dust is controlled, both stockpiled on-site storage and for permanently placed fill.

Haulage routes for excavated material must avoid residential and sensitive areas and not impact significantly on public traffic.

Community concerns

While LeadWest supports this project and the economic benefits it will deliver to our region, we note strongly that it is not a panacea to the many transport infrastructure bottle-necks that frustrate and constrain our growing region. The current proposal for the WGT project will not deliver any significant public transport benefits, and it is arguable whether this \$5.5 billion project is the best, most cost-effective way to manage trucks on residential streets.

LeadWest is now seeking to deliver the best outcomes from a project that we would not have identified as the priority for best meeting the needs of communities in Melbourne's west.

Through this submission, LeadWest also provides information on measures and projects that would serve to augment investment in the West Gate Tunnel, including:

- Public transport and travel demand management measures
- Additional cycling and pedestrian connection projects
- Toll avoidance and infringement risk mitigation measures
- Road freight transport management measures
- Freight on Rail projects - the Western Interstate Freight Terminal and the Port Rail Shuttle
- Future proofing for WestLink
- Local procurement and employment measures.

LeadWest believes that the project provides a significant opportunity to help reduce traffic congestion through travel demand management and improved on-road public transport priority measures.

Melbourne's west remains underserved by public transport. Provision of more frequent rail and bus services would assist to reduce some of the car traffic congestion issues faced by the region. Consequently, LeadWest is disappointed to see there is no provision in the West Gate Tunnel Project for the infrastructure that would enable bus rapid transit to Melbourne CBD and high employment density areas of Melbourne's inner north and inner south via services using the West Gate Freeway, West Gate Tunnel and the West Gate Bridge.

In this submission, LeadWest identifies several additional cycling and pedestrian connection projects that would augment the significant investment in cycling to be delivered through the project.

In this submission, LeadWest also provides some insight on the toll avoidance problem and the issue of toll infringement risks.

Critically, LeadWest relays in this submission the members' views on the need for additional road freight transport management measures to deal with potential truck traffic displacement



and highlights the freight-on-rail projects that could significantly reduce the volume of truck traffic in Melbourne's inner west.

We note that LeadWest's member councils previously supported WestLink. We anticipate that the WestLink project will still be required within the next decade. We strongly suggest that the WGT project be "future-proofed" so as to not constrain any future implementation of WestLink.

Finally, LeadWest urges the inclusion of social procurement provisions for the project that strengthen the local economy through the creation of local jobs and sourcing of services and goods from local businesses. Opportunities for direct training and skills development for local employees should be pursued.

WEST GATE FREEWAY COMPONENT

Key Impacts

Construction

LeadWest notes that there is risk of construction traffic, dust, and noise impacting on residents and visitors to areas near to the existing road reserve. While the location of construction work sites within or adjacent to the existing West Gate Freeway road reserve will help to minimise amenity impacts such as construction dust and noise, it is critical that all measures are put in place to effectively minimise and contain impact on broader neighbouring areas.

LeadWest views as vital the appointment and maintenance of an effective Transport Management Liaison Group to guide the project's creation and amendment of a Traffic Management Plan and to monitor performance against the plan. The Transport Management Liaison Group should include representation from affected councils and local communities.

Similarly, LeadWest urges the appointment and maintenance of an effective Construction Impact Liaison Group to guide the project's creation and amendment of a plans to address the Environmental Performance Requirements and to monitor performance against these plans. This group should also include representation from affected councils and local communities.

Operation

LeadWest notes a problem in the claim made in the Environment Effects Statement that adverse operational impacts have been minimised largely through the project design. Specifically, the EES does not address the potential risk of tolling arrangements displacing truck traffic impacts from residential areas within the City of Maribyrnong to other areas, particularly those within the City of Hobsons Bay. It is LeadWest's view that the current design will trigger toll and truck ban avoidance, generating significant adverse truck traffic impacts on the City of Hobsons Bay.

LeadWest strongly urges the Victorian Government to finance the project via a "shadow toll/availability charge", as implemented on the Peninsula Link. This measure would mitigate the risk of toll avoidance and traffic displacement, as well as easing the significant pressure on Victoria's justice system created by toll infringement cases.

LeadWest is aware that the current toll infringement system in Victoria is placing unsustainable pressure on Victoria's Magistrates' Courts, support services, communities and families. The West Gate Tunnel Project legislation and concession deed amendments present a rare opportunity for government, CityLink and EastLink to acknowledge and address the unintended and damaging impacts of the toll enforcement system.

Of the ten local government areas recording the highest infringement warrant debt in 2014-15, three were in Melbourne's west: Wyndham residents owed \$70,285,630; Melton residents owed \$65,157,948; and Brimbank residents owed \$57,641,317.

If the West Gate Tunnel is direct tolled, LeadWest does not doubt that residents of Melbourne's west will incur high infringement warrant debts and there will be significant traffic displacement due to toll avoidance.

Key asset/place based impacts

LeadWest presents in Table 1 a perspective on each of key asset/place based impacts and benefits throughout the West Gate Freeway component.

Table 1: West Gate Freeway component key asset/place based impacts and benefits

Asset / Place	LeadWest Perspective
Altona Memorial Park	<p>LeadWest suggests that noise mitigation to ensure no exceedances of project noise levels in the chapel is insufficient.</p> <p>LeadWest suggests that noise mitigation should enable quiet contemplation by grieving people at all burial and memorial sites within the Altona Memorial Park.</p> <p>LeadWest suggests that noise mitigation could be enhanced through provision of assistance to Greater Melbourne Cemeteries Trust to strengthen buffer plantings of trees, shrubs and understory.</p>
Kororoit Creek	<p>LeadWest suggests that impacts on water quality in the creek, even minimal impacts, should be offset by measures to enhance water quality in the creek.</p> <p>LeadWest suggests that the 0.05 ha of remnant Riparian Woodland vegetation lost due to construction works should be offset with Riparian Woodland vegetation protection and restoration elsewhere in Melbourne's west.</p> <p>LeadWest welcomes the upgraded share use path along the Creek and landscaping of the reserve.</p> <p>LeadWest suggests that permanent piers in the floodplain may lead to debris build-up after flood events. Accordingly, operational maintenance specifications for the West Gate Tunnel should include requirements to clear debris from these piers.</p> <p>LeadWest suggests that potential for disturbance of two Aboriginal cultural heritage sites should be avoided.</p>

Asset / Place	LeadWest Perspective
WLJ Crofts Reserve	LeadWest suggests that loss of a strip of land along the northern border (0.3% of total area) should be offset by enhancement through vegetation planting of an equivalent area.
Areas close to the freeway	<p>LeadWest suggests that construction noise and other impacts be monitored through appointment and maintenance of an effective Construction Impact Liaison Group to guide the project's creation and amendment of a plans to address the Environmental Performance Requirements and to monitor performance against these plans. This group should also include representation from affected councils and local communities.</p> <p>LeadWest welcomes the provision of new and replacement noise barriers.</p> <p>LeadWest suggests that businesses affected by acquisition of industrial properties should receive assistance from the Victorian Government (for example, to re-establish their business within Melbourne's west).</p> <p>LeadWest welcomes landscaping improvements to Lynch Road Reserve, however LeadWest suggests that the permanent loss of 34% of the reserve area should be offset by creation of additional open space near to the lost open space.</p>
Urban renewal sites	<p>LeadWest welcomes provision of new open space at the northern boundary of the Precinct 15 site and a new shared use path connecting the Bradmill and Precinct 15 sites.</p> <p>LeadWest also welcomes the 'future proofing' provision for a road connection between the two sites and avoidance of restriction on future development of the sites.</p>
New and upgraded public open space	LeadWest welcomes provision of a 3 ha park adjacent to the westbound southern portal and new landscaped open space at The Avenue.
Mclvor Reserve	LeadWest notes the temporary occupation of the car parking area for construction and urges the project to provide a nearby located temporary car parking area for users of Mclvor Reserve.

Asset / Place	LeadWest Perspective
Fogarty Avenue	LeadWest welcomes separation of the Federation Trail from the road.
Donald McLean Reserve	LeadWest notes the potential for impact on the cricket nets and urges the relocation of these nets well before commencement of the cricket season.
Westgate Golf Course	LeadWest notes the temporary and ongoing impacts on the Westgate Golf Course and suggests that the project provide assistance to the operator to enable a player temporary transfer scheme so that they can play at other golf courses within Melbourne's west at the same cost as if they were playing at Westgate Golf Course.
Hyde Street Reserve	<p>LeadWest notes that permanent piers in the floodplain may lead to debris build-up after flood events. Accordingly, operational maintenance specifications for the West Gate Tunnel should include requirements to clear debris from these piers.</p> <p>LeadWest welcomes the new shared path over Stony Creek.</p> <p>LeadWest is concerned about the loss of 0.47 ha of remnant Coastal Saltmarsh vegetation predicted to be lost from the south bank of Stony Creek due to construction and overshadowing and suggest this loss be offset by enhancement of areas of the south bank of Stony Creek that will not be overshadowed.</p>
Tree removal and replanting	LeadWest welcomes the planting of a number of trees that exceeds the number of trees required to be removed. Increase in canopy cover in Melbourne's west aligns with our Greening the West initiative. LeadWest suggests that planting be undertaken early in the project to ensure good establishment and growth prior to the project construction completion.

Traffic and transport

Construction phase

LeadWest notes that the project's construction works and activities will significantly disrupt traffic movement along the West Gate Freeway and the local road network surrounding the project. While some disruption is inevitable, it is critical that this disruption and the associated impact on residents and businesses in Melbourne's west is minimised.

LeadWest calls for careful planning of the West Gate Freeway upgrade works to be undertaken in sections to manage disruption to road users and adjacent communities.

LeadWest views it as crucial that there be maintenance of current capacity (number of lanes) during peak periods along the Princes Freeway, M80 Ring Road, Williamstown Road, Millers Road, and Grieve Parade. LeadWest would add Melbourne Road (which is the southern extension of Williamstown Road).

Impact on business

Traffic congestion, access restrictions, tolls and land acquisitions both during and after project construction will all impact significantly on local businesses. In particular, the imposition of new tolls on trucks using the West Gate Freeway will place additional cost pressure on the transport industry. We urge the government to ensure appropriate consideration is given to the impact of both short and long-term measures on the health and growth of businesses in Melbourne's west.

Traffic displacement

LeadWest does not believe that sufficient consideration has been given to the potential displacement of truck traffic to local roads as a result of the WGT project. In particular, while truck bans on streets within the Maribyrnong LGA will help reduce this effect, corresponding measures are also required in the Hobson's Bay LGA.

Consequently, LeadWest seeks announcement by the Victorian Government of additional implementation of truck bans on:

- Blackshaws Road
- Hudsons Road
- High Street
- Mason Street
- Kororoit Creek Road (east of Millers Road)
- Millers Road (except for trucks which originate or terminate in Brooklyn and Altona North)

This is to mitigate toll avoidance in the truck only tolled section of the West Gate Freeway from Grieve Parade to Melbourne/Williamstown Road (local businesses with a destination point within these areas would be exempt from these truck bans). The Hyde Street ramps should be made available for placarded and local trucks only.

The final project must also ensure the toll structure is set so that cars exiting at Hyde Street pay the same toll as those exiting at the city, to prevent the Hyde Street exit being used for toll minimisation.

Health and amenity

LeadWest appreciates the intention to apply rigorous noise, vibration and air quality standards and requirements to protect the health of residents and the amenity of open spaces and community facilities adjacent to the West Gate Freeway component of the project.

LeadWest is concerned however that some of the standards are insufficient for the West Gate Freeway component, particularly those relating to noise and air quality. For example, current noise abatement regulations do not sufficiently protect users of sports ovals from excessive noise impacts and current air quality regulations do not sufficiently account for chemical composition and toxicity of the particulate matter or accumulated exposure over a lifetime.

Significant concerns are held by LeadWest and local communities regarding the impact to health and the amenity impacts of the West Gate Freeway component.

Noise

Despite the improvements to the extent of noise walls in the project in the initial design tender, noise impacts remain a concern.

Construction noise is likely to be high along the West Gate Freeway component. Concerns remain about permissible noise levels during construction (particularly night time) and maximum noise levels at night during operation of the completed West Gate Freeway component, potentially impacting residents' sleep and general wellbeing.

During the construction phase, the Environmental Performance Requirements should specify protections for sporting and community events held within public open space such as Donald McLean Reserve.

Noise walls should be provided along the full boundary of the Precinct 15 urban renewal site, the full length of Fogarty Avenue, and the Hyde Street Reserve and Stony Creek Reserve open space areas adjacent to the West Gate Freeway component.

Air quality

Member councils representing the communities most directly impacted by the West Gate Tunnel Project need assurance that air quality will be improved for these communities. As part

of the final project, LeadWest would like to see monitoring stations for air quality around the tunnels component to become permanent and form part of the EPA monitoring network.

For example, the Spotswood/South Kingsville Residents Group has raised concerns about worsening air quality impacts on the community resulting from the West Gate Freeway and Tunnels components. Specific concerns relate to the project's lack of monitoring ultrafine air particles and that a filtration system should be included in the tunnel portal ventilation design.

Further evaluation of the air quality assessment will be required, particularly regarding particulate matter from diesel vehicle emissions, emissions from the ventilation shaft (and the possible need to provide filtration), impacts along the roads predicted to have high truck volumes and the need to consider ultrafine particles emitted from the project and the impact on public health.

Physical environment

LeadWest and its members and affiliates are focused on the environment in Melbourne's west, including the 'green infrastructure' assets and services provided by the natural and modified environment.

Substantive concerns are held by LeadWest and local communities regarding the impact to the physical environment by the West Gate Freeway component.

Open space and planning

Community requests, supported by Hobsons Bay Council and LeadWest, have also been made for the project to convert some of the existing privately-owned land between the West Gate Bridge and Simcock Avenue to public open space with links to the Stony Creek Reserve and to Scienceworks Museum.

Any remnant or acquired land becoming surplus following completion of the construction works should be converted to open space and appropriately landscaped or redeveloped to maximise opportunities to improve the amenity and functionality of these sites.

Vegetation

The project will remove almost all existing vegetation along the freeway corridor within the work zone.

Whilst the commitment to undertake significant replacement planting is acknowledged, consultation with Maribyrnong City Council and Hobsons Bay City Council will be required to identify locations, species selection, maintenance periods and ongoing responsibilities.

Planting must be undertaken early in the project to ensure good establishment and growth prior to the project construction completion.

Water treatment and management

Details on the treatment and management of surface water, drainage and wastewater are not yet clearly defined in the following areas:

- Discharge into Kororoit Creek
- Management of water pumped for the tunnel works
- Water treatment and reuse schemes and systems
- Impacts to public open space during construction and proposed permanent schemes
- Flooding risks and mitigation measures
- Drainage scheme capacities and interconnections.

Community

LeadWest and its members and affiliates are focused on the wellbeing of members of the fast-growing communities of Melbourne's west.

LeadWest notes that open spaces and community and recreational facilities closer to construction works site and compounds associated with the West Gate Freeway component would be 'affected temporarily'.

LeadWest is concerned that the durations of these 'temporary' impacts are not specified and highlights the potential for enduring impact on the development of children if local sports facilities are unavailable to them.

Heritage

LeadWest highly values the heritage of Melbourne's west and perceives the need for protection of heritage features impacted by the West Gate Freeway component:

- The Melbourne Glass Bottle Works amenities building on Simcock Avenue is indirectly impacted by the use of Simcock Avenue as the access to the new on ramp from Hyde Street.
- The bluestone bridge over Kororoit Creek
- Brooklyn Pump station on Millers Road
- West Gate memorial on Hyde Street.

TUNNELS COMPONENT

Key Impacts

Construction

LeadWest notes that construction-related impacts within this component would be associated with works required to excavate the tunnels beneath Yarraville. As the spoil from the tunnels will need to be transported to other locations, this construction impact falls more broadly throughout Melbourne's west.

LeadWest views as vital the appointment and maintenance of an effective Transport Management Liaison Group to guide the project's creation and amendment of a Traffic Management Plan and to monitor performance against the plan. The Transport Management Liaison Group should include representation from affected councils and local communities.

Similarly, LeadWest urges the appointment and maintenance of an effective Construction Impact Liaison Group to guide the project's creation and amendment of a plans to address the Environmental Performance Requirements and to monitor performance against these plans. This group should also include representation from affected councils and local communities.

Operation

LeadWest notes a problem in the claim made in the Environment Effects Statement that adverse operational impacts have been minimised largely through the project design. Specifically, the tolling arrangements for the project give rise to significant risk of displacement of truck traffic impacts from residential areas within the City of Maribyrnong to other areas, particularly those within the City of Hobsons Bay. The current design is highly likely to trigger toll and truck ban avoidance, generating significant adverse truck traffic impacts on the City of Hobsons Bay.

As described in relation to the West Gate Freeway component, LeadWest strongly urges the Victorian Government to finance the project via 'shadow tolls/availability charge as implemented on the Peninsula Link. This measure would mitigate the risk of toll avoidance and traffic displacement. Commercial vehicle tolls could be recovered through a levy on commercial vehicle registration.

Key asset/place based impacts

LeadWest presents in Table 2 a perspective on each of key asset/place based impacts and benefits throughout the Tunnels component.

Table 2: Tunnels component key asset/place based impacts and benefits

Asset / Place	LeadWest Perspective
New and upgraded public open space	<p>LeadWest welcomes the addition of a new 1.7 ha open space area north of the West Gate Bridge and east of the Williamstown/Werribee rail line, with a new shared user path over Stony Creek and urges the project to work with Maribyrnong City Council and the Friends of Stony Creek to plan and implement the re-vegetation elements of this open space.</p> <p>LeadWest welcomes the new 2.8 ha park and wetland (predominantly wetland) at Whitehall Street and notes that maintenance during the operation life of the project will be vital.</p>
Stony Creek waterway	<p>LeadWest suggests that impacts on water quality in the creek, even minimal impacts, should be offset by measures to enhance water quality in the creek.</p> <p>LeadWest notes that permanent piers in the floodplain may lead to debris build-up after flood events. Accordingly, operational maintenance specifications for the West Gate Tunnel should include requirements to clear debris from these piers.</p>
Yarraville Gardens and Hanmer Reserve	<p>LeadWest welcomes the provision that there will be no impacts to Yarraville Gardens unless agreed with Maribyrnong City Council.</p> <p>LeadWest welcomes the provision of a new boardwalk and shared use path along Harris and Hyde streets between the gardens and the Maribyrnong River waterfront, which will enable better connection between Yarraville Village and the waterfront.</p>
Whitehall Street and Somerville Road intersection	<p>LeadWest urges careful consideration of signal timing to minimise delays on approaches. LeadWest is aware of several nearby instances of poor coordination of signal timing that create congestion bottlenecks and vehicle collision risks.</p>
Northern portal area	<p>LeadWest notes that the location will be a major works site and is likely to generate significant construction related truck traffic in the short-term, thus LeadWest suggests that all such traffic avoid use of Francis Street, Somerville Road, Buckley Street and Moore Street by travelling via Whitehall Street, Moreland Street, Footscray Road, CityLink and the West Gate Freeway.</p>

Asset / Place	LeadWest Perspective
Haulage routes	LeadWest suggests that all construction traffic avoid use of Francis Street, Somerville Road, Buckley Street and Moore Street by travelling via Whitehall Street, Moreland Street, Footscray Road, CityLink and the West Gate Freeway.
Cotton Mills commercial complex	LeadWest highlights that the impacts go beyond the Cotton Mills commercial precinct and also impact upon The Dream Factory and other premises facing Maribyrnong Road.
Residential streets in Yarraville and Footscray	LeadWest highlights that, even if announced truck bans are implemented, there will remain some localised, and therefore exempted, truck traffic on Francis Street, Somerville Road, Buckley Street and Moore Street. It should be made clear to local communities that the project does not entirely eliminate truck traffic from residential streets.
Tree removal and replanting	LeadWest welcomes the planting of a number of trees that exceeds the number of trees required to be removed. Increase in canopy cover in Melbourne's west aligns with our Greening the West initiative. LeadWest suggests that planting be undertaken early in the project to ensure good establishment and growth prior to the project construction completion.

Traffic and transport

LeadWest perceives there to be no doubt that construction works and activities would disrupt traffic movement along Whitehall Street and Moreland Road.

LeadWest views as vital the appointment and maintenance of an effective Transport Management Liaison Group to guide the project's creation and amendment of a Traffic Management Plan and to monitor performance against the plan. The Transport Management Liaison Group should include representation from affected councils and local communities.

Health and amenity

Significant concerns are held by LeadWest and local communities regarding the impact to health and amenity impacts of the Tunnels component.

Noise

Noise impacts remain a concern.

During the construction phase, the Environmental Performance Requirements should specify protections for sporting and community events held within public open space such as Yarraville Gardens.

Operational noise increases likely to impact upon use and enjoyment of Yarraville Gardens require further consideration and the City of Maribyrnong should be consulted on noise mitigation options.

Air quality

Member councils representing the communities most directly impacted by the West Gate Tunnel Project need assurance that air quality will be improved for these communities. As part of the final project, LeadWest would like to see monitoring stations for air quality around the tunnels component to become permanent and form part of the EPA monitoring network.

Further evaluation of the air quality assessment will be required, particularly in regard to particulate matter from diesel vehicle emissions, emissions from the ventilation shafts (and the possible need to provide filtration), and the need to consider ultrafine particles emitted from the project and the impact on public health.

Physical environment

LeadWest and its members and affiliates are focused on the environment in Melbourne's west, including the 'green infrastructure' assets and services provided by the natural and modified environment.

Open space and planning

There are a number of issues that the Environment Effects Statement needed to address further in relation to open space, including:

- Clarification of the extent of land to be temporarily acquired
- Compensatory public open space
- Impacts from groundwater depressurisation on park assets and ecology
- Detailed design and connections for the shared use path through Harris Street
- Mitigation of impacts to the Stony Creek Reserve

The large amount of temporarily acquired land – such as the Mclvor Reserve (in the West Gate Freeway component), areas of the Westgate Golf Course and Stony Creek Reserve – will have a significant impact on communities. More detail on the effects on these areas should be provided before the West Gate Tunnel Project is approved.

The Environment Effects Statement includes little analysis of whether the open space provided in compensation for permanently acquired areas will serve the same purpose as what is being taken, degraded or lost. For example, it is debatable whether much of the proposed Whitehall

Street reserve should be regarded as new public open space, given it is a stormwater retarding basin and much of the site other than the proposed boardwalks could be used by members of the public.

The nature of management tenure and public access also needs to be clarified. Compensatory open space must be accessible and supported by an urban design process that is funded by the Western Distributor Authority and completed in consultation with relevant local councils and utility authorities.

Vegetation

The project will remove some of the existing vegetation in the Stony Creek Reserve and Hyde Street Reserve.

Whilst the commitment to undertake significant replacement planting is acknowledged, consultation with Maribyrnong City Council will be required to identify locations, species selection, maintenance periods and ongoing responsibilities.

Planting must be undertaken early in the project to ensure good establishment and growth prior to the project construction completion.

Water treatment and management

Details on the treatment and management of surface water, drainage and wastewater are not yet clearly defined in the following areas:

- Lyons Street Drain, formerly Billy Button Creek
- Maribyrnong River
- Stony Creek
- Stony Creek Backwash

PORT, CITYLINK AND CITY CONNECTIONS COMPONENT

Key Impacts

Construction

LeadWest appreciates that location of construction work sites and compounds within or adjacent to the existing road reserve through the West Gate Freeway component will mean that amenity impacts (such as construction dust and noise) would be confined somewhat to areas close to the freeway.

However, LeadWest notes that there is risk of construction dust and noise impacting on residents and visitors to areas near to the existing road reserve. In relation to the Port, CityLink and City Connections component this will mean potentially significant construction noise

impacts on residents in Footscray, particularly in the area bounded by Napier Street, Maribyrnong Street, Bunbury Street and Whitehall Street. It will also mean construction impacts on users of open space and shared trails along the Maribyrnong River, Footscray Road, and Moonee Ponds Creek.

Operation

LeadWest notes a problem in the claim made in the Environment Effects Statement that adverse operational impacts have been minimised largely through the project design. Specifically, the tolling arrangements for the project give rise to risk of toll avoidance, generating significant traffic impacts within the inner west.

Key asset/place based impacts

LeadWest presents in Table 3 a perspective on each of key asset/place based impacts and benefits throughout the Port, CityLink and city connections component.

Table 3: Port, CityLink and city connections component key asset/place based impacts and benefits

Asset / Place	LeadWest Perspective
Businesses along alignment	LeadWest is concerned about the partial acquisition or displacement of eighteen business properties around the northern portal, Footscray Road and port area. Whilst it is noted that there would be compensation for parties with an interest in land required for the project, the impact falls on tenant businesses not just land owners. Consequently, LeadWest is concerned that there is not an offer of appropriate facilitation for the affected businesses to relocate.
Maribyrnong River waterfront	In light of the significant impact that the project will make and order to ensure the most harmonious final result, LeadWest also urges the Victorian Government to fund the Maribyrnong River Edge Master Plan.
Port of Melbourne	LeadWest welcomes the provision of access to both sides of the port, whilst highlighting that rail access must also be considered and the design reflecting 'future-proofing' to ensure rail access.
New and upgraded public open space	LeadWest urges careful consideration of access to the new 1.4 ha parkland from approaches that would be taken by people travelling from Melbourne's west.

Asset / Place	LeadWest Perspective
Moonee Ponds Creek	LeadWest notes that permanent piers in the floodplain may lead to debris build-up after flood events. Accordingly, operational maintenance specifications for the West Gate Tunnel should include requirements to clear debris from these piers.
E-Gate urban renewal precinct	LeadWest urges careful consideration of access to E-Gate from approaches that would be taken by people travelling from Melbourne's west.
Digital Harbour	LeadWest urges careful consideration of access to Digital Harbour from approaches that would be taken by people travelling from Melbourne's west.
West Melbourne	LeadWest urges the project to facilitate temporary accommodation of residents impacted by construction noise.
Tree removal and replanting	LeadWest welcomes the planting of a number of trees that exceeds the number of trees required to be removed. Increase in canopy cover in Melbourne's west aligns with our Greening the West initiative. LeadWest suggests that planting be undertaken early in the project to ensure good establishment and growth prior to the project construction completion.

Traffic and transport

LeadWest perceives there to be no doubt that construction works and activities would disrupt traffic movement along Footscray Road and most likely also impacting on Dynon Road.

LeadWest views as vital the appointment and maintenance of an effective Transport Management Liaison Group to guide the project's creation and amendment of a Traffic Management Plan and to monitor performance against the plan. The Transport Management Liaison Group should include representation from affected councils and local communities.

Health and amenity

Concerns are held by LeadWest and local communities regarding the impact to health and amenity impacts of the Port, CityLink and city connections component.

Noise

Noise impacts remain a concern.

During the construction phase, the Environmental Performance Requirements should specify protections for community events held, such as the St Jerome's Laneway Festival held within

the Moreland Street, Bunbury Street, Maribyrnong Street and Parker Street environs and public open space at Footscray Community Arts Centre and Grimes Reserve.

Operational noise increases likely to impact upon use and enjoyment of Yarraville Gardens require further consideration and the City of Maribyrnong should be consulted on noise mitigation options.

Air quality

Member councils representing the communities most directly impacted by the West Gate Tunnel Project need assurance that air quality will be improved for these communities. As part of the final project, LeadWest would like to see monitoring stations for air quality around the tunnels component to become permanent and form part of the EPA monitoring network.

Further evaluation of the air quality assessment will be required, particularly in regard to particulate matter from diesel vehicle emissions, emissions from the ventilation shafts (and the possible need to provide filtration), and the need to consider ultrafine particles emitted from the project and the impact on public health.

Physical environment

LeadWest and its members and affiliates are focused on the environment in Melbourne's west, including the 'green infrastructure' assets and services provided by the natural and modified environment.

Open space and planning

The proposed ramp connections to the Port of Melbourne will transform the Maribyrnong River when looking south or when viewed from Shepherds Bridge. It will detract from the urban design attributes of the proposed bridge and will not afford visual surveillance to the setting of the Port of Melbourne, which has an historical association with the river front.

While the West Gate Tunnel proposes to enhance connections to the Yarraville Gardens, there is a need to respond to the new urban context through further planning and contributions to the river front facilities, along the Maribyrnong River.

The Maribyrnong River corridor provides a vital link for the delivery of festivals and community events and activities and is a destination of choice to a growing number of creative industries, sporting organisations and world class festivals. These activities draw cultural tourists to the city and provide the local community the environment with which to engage with nature in an inner-city environment.

The visual analysis provided does not enable one to assess completely the impact of the proposed ramp designs. The footprint of the ramps are a major change from reference design, from 150m to 275m. The alignment, which is diagonal is not justified by precedent. Nearly all

river crossings along the Yarra and Maribyrnong Rivers seek to achieve something close to a 90-degree angle to the river.

Vegetation

There are concerns, backed by the condition of landscaping under the Bolte Bridge and along Moonee Ponds Creek, that landscaping will struggle to thrive under the additional shadow fall created.

Heritage

LeadWest highly values the heritage of Melbourne's west and perceives the need for protection of a number of heritage features impacted by the Port, CityLink and city connections component, including:

- Billy Button Creek bluestone drain west of the Maribyrnong River
- Botterill and Fraser Slipways Concrete Landings east of Maribyrnong River
- Cotton Mills precinct west of the Maribyrnong River
- Footscray General Cargo Wharf South
- King Islander Cattle Loading Gantry
- Lyons Street Explosives Store, Tramway and Dock
- Mowling's Soap and Candle Works west of the Maribyrnong River
- Port Phillip Monument east of the Maribyrnong River
- Powder Magazine in Footscray west of the Maribyrnong River
- Shepherd Swingbridge Abutment Foundations on the Maribyrnong River
- Shipwrecks including *Edina*, *Hilaria*, *River Queen*, *Stranger*, *Victoria* and an unidentified ship in the Maribyrnong River
- Sims Street Unidentified Timber Slipways and Boats on the Maribyrnong River
- West Melbourne Rubbish Tips west of the Moonee Ponds Creek
- South Dynon railway turntables west of the Moonee Ponds Creek.

PROJECT-WIDE IMPACTS

Traffic and transport

As previously stated, the West Gate Tunnel should deliver important benefits to residents in Melbourne's west by relieving congestion and providing a much needed second crossing of the Maribyrnong River.

LeadWest also strongly welcomes the truck ban on some residential streets. However, significant issues remain to be addressed regarding the management of road freight that should be considered as part of the Environment Effects Statement process.

LeadWest highlights that Maribyrnong City Council seeks to persuade the joint Inquiry and Advisory Committee that the McKenzie Road ramps are lacking in proper justification. Council identifies the capacity of Appleton Dock Road to provide an acceptable level of service and, if an alternative were required, proposes that an off-ramp providing access to Dock Link Road should be preferred, and that ramps can be staged and delivered in the event that they become needed.

Construction Impacts

The traffic impacts during construction of the project will be significant and far reaching due to the downgrading and reduced capacity of the freeway during construction. LeadWest anticipates that the extent of these impacts will require changes to signalling on major arterial roads and a need for travellers make changes to their travel behaviour.

LeadWest suggests the following Environmental Performance Requirement:

- In advance of construction works, Western Distributor Authority to develop and implement a travel demand management strategy and appropriate tools in consultation with the relevant transport agencies to promote specific transport behaviour changes in response to road, bicycle and pedestrian paths closures/modifications and to reduce traffic congestion around construction sites, particularly in the vicinity of the Millers Road and Melbourne Road interchanges and at Hyde Street.
- The strategy must be consistent with the West Gate Tunnel Project Community and Stakeholder Engagement Plan.
- The proposed temporary diversion of Federation Trail using Millers Road and Francis Street results in significant extra distance and travel time on very busy roads with high truck volumes and is not supported. A safer alternative should be provided.
- Key earthworks or construction activities should be carefully managed and coordinated with projects managed by the Melbourne Metro Rail Authority Project and Level Crossing Removal Authority to ensure that construction traffic minimises impacts to the adjoining communities while also minimising disruptions to businesses and the general travelling public.

Public Transport and Demand Management

LeadWest believes that this project provides a significant opportunity to help to reduce traffic congestion through travel demand management and improved on road public transport priority measures.

The failure of the project to significantly enhance public transport opportunities and outcomes along the corridor is considered a key shortcoming in the project design.

The failure to include dedicated bus lanes and priority measures to assist bus operations and services is a major oversight in the project. Transit lanes should be provided to encourage multi-occupant passenger vehicles.

Cycling and Pedestrian Connections

The Tender Design contains a number of cycling and pedestrian upgrades and improvements and is an improvement on the Reference Design. However, there are a number of missed opportunities to deliver the Western Trails strategy, outlined in the table below.

Details for the connections to the existing network (including on road cycle paths) requires clarification to ensure that safe and effective connections are made to a high standard. For example, a grade separation of Federation Trail at Hyde Street with a seamless connection to the Coastal Bay Trail would provide a much better outcome. LeadWest also seeks that the proposed upgrade of Federation Trail west of Millers Road to be a full reconstruction in concrete rather than a resurface of the existing asphalt treatment.

Federation Trail should be provided as a continuous off-road shared path. Lighting along the trail should also be upgraded as part of the project.

Table 4: Opportunities to deliver cycling infrastructure

West Gate Tunnel Projects	West Trails Strategy Projects	Comments
A new connection from the Federation Trail to Hyde Street Reserve and Spotswood Railway Station, connecting the neighbourhoods of Yarraville and Spotswood.	Fill the 2km gap on the Stony Creek Trail between Cruikshank Park (Francis Street) to existing section west of Hyde Street.	Project identified in Western Trails Strategy.
The extension of the Federation Trail (which currently does not connect through Yarraville) and	Complete missing section (2.5km) of the Federation Trail from Fogarty Avenue to	Project identified in Western Trails Strategy.

West Gate Tunnel Projects	West Trails Strategy Projects	Comments
providing new connections to New Street (at South Kingsville) and a new crossing of Stony Creek to link with the northern side of the Hyde Street Reserve and the Bay West Trail on the eastern side of Hyde Street including grade separation at Williamstown Road.	Hyde Street including bridge across the railway.	
Completion of the Kororoit Creek shared path Stage 1 upgrade (Geelong Road to Grieve Parade).	Complete missing gap in Kororoit Creek Trail under the Geelong Road Bridge.	Project identified in Western Trails Strategy.
Element not in West Gate Tunnel proposed projects.	Extend Stony Creek Trail 2.5km north west to Sunshine Road (including a train crossing).	
Element not in West Gate Tunnel proposed projects.	Fill 600m gap on the Stony Creek Trail from Somerville Road to Cala Street.	
Element not in West Gate Tunnel proposed projects.	Completion of the Coastal Trail (700m) at Greenwich Reserve through to the rear of the Newport Power Station.	
Element not in West Gate Tunnel proposed projects.	Extend the Kororoit Creek Trail 6.0km from the Princes Highway to Millers Road, including three underpasses to connect to the Coastal Trail.	
A shared use path near the Newport Freight Railway	Not identified in West Trails Strategy.	A welcome addition to the West Trails network.

West Gate Tunnel Projects	West Trails Strategy Projects	Comments
Line, connecting the Bradmill and Precinct 15 urban renewal sites.		
A new bridge over Whitehall Street connecting to the Maribyrnong River waterfront and taking cyclists off busy Whitehall Street.	Not identified in West Trails Strategy.	A welcome addition to the West Trails network.
New paths across the West Gate Freeway, improving safety and access for pedestrians and cyclists including replacement pedestrian overbridges and improvements under the freeway at Millers Road and Williamstown Road.	Not identified in West Trails Strategy.	A welcome addition to the West Trails network.
A new 2.5 kilometre elevated 'veloway' on Footscray Road, giving cyclists a safe express route to and from the central city and supporting the growing number of Melbournians riding to work each day (with the existing path remaining in place as an alternative route featuring new landscaping).	Not identified in West Trails Strategy.	A welcome addition to the West Trails network if the 2.5 km veloway is at least 4.0 m wide to meet Austroads Guidelines.

Mitigating Toll Avoidance and Infringement Risk

Toll avoidance is a significant issue. LeadWest highlights the impact on local roads of toll imposition on an existing freeway – CityLink.

In Moonee Valley, up to one-fifth of northbound and southbound traffic travels through Moonee Valley on local roads and exits at the other end. This is traffic avoiding the tolled CityLink.

Table 5: Northbound traffic through Moonee Valley

Northbound	%	Time
Maximum % of traffic that enters Mt Alexander Road, Flemington in a northbound direction that drives through to Bulla Road	20.7%	5.45pm
Average % of traffic at Mt Alexander Road that is driving through to Bulla Road	11.2%	
Maximum average travel time - Mt Alexander Road to Bulla Road	0:24:55	5.30pm

Table 6: Southbound traffic through Moonee Valley

Southbound	%	Time
Maximum % of traffic that enters Bulla Road in a southbound direction that travels through and exits Mt Alexander road	20.4%	11.15am
Average % of traffic at Bulla Road that is driving through Moonee Valley and exiting and Mt Alexander Road	10.6%	
Maximum average travel time - Bulla Road to southern end of Mt Alexander Road	0:23:35	10.15am

LeadWest has received from CommUnity+ (one of LeadWest's affiliates) the document titled 'Our Plan for a Fair and Effective Toll Enforcement System for Victoria' (April 2017). LeadWest's agrees with the premise of that document: The West Gate Tunnel Project presents an important opportunity to review the effectiveness and cost to the Victorian Government of the current regime used to enforce unpaid tolls.

The current system is the result of commercial negotiations and policy decisions with consequences that were not foreseen. The current system is placing unsustainable pressure on Victoria's Magistrates' Courts, support services, communities and families. The system delivers a disproportionate blow to people who for a variety of legitimate reasons are unable to pay the toll at a particular time, but who want to do the right thing.

In 2014, the Sentencing Advisory Council recommended that a working group should be established to "identify and implement potential solutions to the increasing burden of tolling infringement offences on the criminal justice system in Victoria" (recommendation 47). This

recommendation has not yet been implemented and the burden on the system has continued to grow.

In 2015-16, an average of 58,148 CityLink infringements were issued to motorists each month. It has been estimated that the expansion of tolling to the West Gate Tunnel will result in a further 7,000 infringements per month, significantly exacerbating the problems the system is already facing.

The West Gate Tunnel Project legislation and concession deed amendments present a rare opportunity for the Victorian Government, and the operators of CityLink and EastLink to acknowledge and address the unintended and damaging impacts of the toll enforcement system.

Road Freight Transport Management

As previously stated, the West Gate Tunnel should deliver important benefits to residents in Melbourne's west by relieving congestion and providing a much needed second crossing of the Maribyrnong River.

LeadWest also strongly welcomes the truck ban on some residential streets; however, significant issues remain to be addressed regarding the management of road freight that should be considered as part of the Environment Effects Statement process.

Alignment

LeadWest supports the long tunnel option for connecting the West Gate Tunnel to the West Gate Freeway. It is considered appropriate that the tunnels be designed and constructed to provide three lanes of traffic in each direction.

The following works and measures would be required as a minimum to ensure that the purported benefits of the West Gate Tunnel Project to communities in the west are realised:

- Review of traffic signals, road space allocation and design on the adjacent road network to deter toll avoidance and through traffic and to promote public transport, walking and cycling;
- Inclusion of freeway access ramps to and from Dohertys Road;
- A north-south arterial road upgrade along Ashley Street, Dempster Street, Paramount Road and Tottenham Parade to provide better connectivity to the West Gate Freeway;

- An additional north south road connection across the freeway should be included to relieve pressure on existing routes;
- Reconsideration of the use of Simcock Avenue as access to the freeway entry ramp from Hyde Street, given the significant potential access and egress issues for current business and including the potential for traffic conflict with on-ramp traffic;
- Grade separation of the Federation Trail and Hyde Street, Spotswood.

Truck bans and traffic displacement

Residents in Melbourne's west disproportionately bear the impacts of Melbourne's freight and trucking industry for the rest of the city.

The announcement by the Victorian Government of truck bans in association with the West Gate tunnel project was therefore welcomed by LeadWest, our members and local community groups.

However, a number of issues remain to be worked through in relation to the truck bans as set out in Table 7.

Table 7: Issues with the proposed truck bans

Issue	Description
<i>Uncertainty</i>	<p>The Andrews Government has committed to implementing 24/7 truck bans on Francis Street and Somerville Road in Yarraville, and Buckley Street and Moore Street in Footscray in 2022, when the West Gate Tunnel Project is completed.</p> <p>However, this is only a promise – there is no legislative or regulatory instrument connecting the project with the truck bans to ensure they go ahead.</p> <p>With at least two Victorian elections between now and the anticipated completion date of the project, LeadWest is seeking a firmer mechanism to ensure the truck bans go ahead.</p> <p>In the meantime, stakeholders in Melbourne's west need certainty that the investment in the West Gate Tunnel Project would not be wasted. For this reason, LeadWest asks that a recommendation be made to the Victorian Government to consider the following options to future proof the truck bans from any future change of government policy:</p>

Issue	Description
	<ol style="list-style-type: none"> 1) That the proposed truck bans be enshrined in an Act of Parliament (rather than delegated legislation) such that they cannot be removed by executive action of any Minister; 2) That as part of any agreement with Transurban for the West Gate Tunnel Project that the road operator be entitled to compensation in the event that any future government decision alters the new truck bans, or allows heavy vehicles (other than placarded trucks accessing the fuel terminals along Hyde Street) to use local roads so as to avoid the West Gate Tunnel tolling gantries; 3) That additional road upgrades be funded as part of the West Gate Tunnel Project where this is necessary to provide an alternative access to the Port of Melbourne, e.g. Paramount Road. 4) If necessary, development of warning systems that discourage or prevent trucks above a specified height from passing through local roads and key intersections; 5) That planning and delivery of a new road connection to the West Gate Freeway via the Paramount Road corridor in Tottenham be explored as a way to mitigate the effects of the West Gate Tunnel on residents in Brooklyn, and to provide an alternate means of access to the West Gate Tunnel and the Port of Melbourne.
<i>Truck traffic displacement</i>	<p>Due to the high level of uncertainty and risk in regard to traffic impacts on Hobsons Bay, particularly with the new truck tolls along the freeway and 24-hour truck bans proposed on existing truck routes north of the Freeway, LeadWest recommends that truck bans and curfews be introduced on a number of roads within Hobsons Bay to protect residential amenity, including on Millers Road.</p> <p>The project is predicted to induce an additional 37,000 vehicles per day onto the West Gate Freeway between Millers Road and Melbourne Road in 2031 (compared to no West Gate Tunnel Project).</p> <p>New tolls along the freeway, in the tunnels and on the Hyde street ramps combined with the introduction of a total truck ban on existing truck routes to the north of Hobsons bay create a high level of uncertainty in regard to traffic impacts on the Hobsons Bay community.</p>

Issue	Description																																	
	<p>Table 8 shows the predicted changes in daily traffic numbers and truck numbers in 2031 from the West Gate Tunnel Project traffic modelling report for the Environment Effects Statement on roads close to the Freeway compared to if the project did not proceed.</p> <p><i>Table 8: Differences in traffic volumes between the project and no project in 2031</i></p> <table><tr><th>Location</th><th>Change in daily traffic numbers in 2031</th><th>Change in daily truck traffic numbers in 2031</th></tr><tr><td>Millers Road (north of Freeway)</td><td>+ 4500</td><td>+ 7000</td></tr><tr><td>Millers Road (south of Freeway)</td><td>+ 600</td><td>+ 800</td></tr><tr><td>Melbourne Road</td><td>+ 800</td><td>+ 100</td></tr><tr><td>Hyde Street</td><td>+ 1500</td><td>+ 1500</td></tr><tr><td>Douglas Parade</td><td>0</td><td>+ 700</td></tr><tr><td>Simcock Avenue</td><td>+ 1500</td><td>+ 800</td></tr><tr><td>Blackshaws Road (east of Millers Road)*</td><td>+ 600</td><td>- 900</td></tr><tr><td>Blackshaws Road (west of Millers Road)*</td><td>- 400</td><td>+ 700</td></tr><tr><td>Hudsons Road*</td><td>- 200</td><td>- 300</td></tr><tr><td>Grieve Parade (south of Freeway)</td><td>+ 600</td><td>- 600</td></tr></table> <p><i>* The modelling for the Environment Effects Statement assumes that traffic measures will be in place to reduce the number of trucks using these roads.</i></p>	Location	Change in daily traffic numbers in 2031	Change in daily truck traffic numbers in 2031	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
Location	Change in daily traffic numbers in 2031	Change in daily truck traffic numbers in 2031																																
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Hudsons Road*	- 200	- 300																																
Grieve Parade (south of Freeway)	+ 600	- 600																																

Issue	Description
	<p>The high predicted increase in the volume of trucks in Millers Road north of the freeway reflects impacts from the toll avoidance of the first tolling station near Grieve Parade and truck bans in Francis Street, Somerville Road, Moore Street and Buckley Street.</p> <p>The West Gate Tunnel traffic impact assessment predicts significant increases in total trucks in Millers Road north of the freeway (up to 14,800 trucks/day in 2031 compared to 4,500 trucks/day now). The difference being 10,300 trucks.</p> <p>Overall traffic is predicted to grow from maximums of 29,000 vpd now to 42,000 vpd in 2031, a 13,000vpd increase.</p> <p>The majority of the predicted total traffic increase will be due to the extra truck numbers.</p> <p>The Environment Effects Statement predicts an extra 7000 trucks /day directly as a result of the project (compared to no project).</p> <p>Residential properties exist along the west side of this section of Millers Road</p> <p>Grieve Parade is considered a more appropriate route for the trucks; however, it is questionable if an already congested freeway interchange and road network in that area could cope with such a large influx of trucks.</p> <p>Also, while the cumulative impacts of predicted development and other major transport projects such as the three level crossing removals, including Kororoit Creek Road (Altona North), Ferguson Street (Williamstown North) and Aviation Road (Laverton) are considered within the Project assessment, uncertainty exists on the actual impacts.</p> <p>LeadWest requests that the Western Distributor Authority and VicRoads undertake a comprehensive Traffic Study that considers the full predicted impacts of the West Gate Tunnel Project on the surrounding road network and identifies a range of adequate mitigation measures to be implemented by the Project, given that the West Gate Tunnel Project will:</p> <ul style="list-style-type: none"> a) introduce new road tolls along the freeway, in the tunnels and on the Hyde street ramps b) introduce 24-hour truck bans on existing truck routes located north of Hobsons Bay

Issue	Description
	<p>c) induce an additional 37000 vehicles per day and 7000 trucks into the corridor (compared to no project)</p> <p>d) create a high level of uncertainty and risk in regard to traffic impacts on surrounding communities</p>
<p><i>Access for Altona North/Brooklyn Industrial Precinct</i></p>	<p>The project scope does not include provision for additional ramps at Grieve Parade or at Dohertys Road to improve north south connectivity to the M80 from the Altona North industrial precinct.</p> <p>The introduction of truck bans will likely divert thousands of trucks into Millers Road and Hobsons Bay via two key north south routes - Paramount Road/Tottenham Parade/Geelong Road and Market Road/McDonald Road that are currently used by many of the trucks accessing container parks and warehouses with destinations in or around the Port.</p> <p>Alternative suggestions to Millers Road would be diverting these trucks south along Geelong Road to Grieve Parade or construct an extension of Tottenham Parade/Cemetery Road into Hardie Road/Cawley Road with a new connection to the Freeway.</p> <p>The Grieve Parade option is the obvious and easiest alternative and would not impact on residents; however, it would involve trucks doubling back about 2km.</p> <p>It would also require capacity upgrades at the on and off ramps at the West Gate Freeway interchange.</p> <p>Hobsons Bay City Council has been working with VicRoads to encourage truck traffic along Grieve Parade (an industrial precinct) rather than Millers Road, which traverses residential areas, activity centres and school zones.</p> <p>Hobsons Bay City Council and VicRoads recently completed the Cumulative Impacts Assessment that identified the Millers Road/West Gate Freeway interchange as a major congestion point due largely to the traffic generated from Precinct 15.</p> <p>Significant increases in truck traffic in Millers Road will further exacerbate traffic congestion, increasing travel delays and likely result in rat running through local streets.</p> <p>Residents of Brooklyn near Millers Road have experienced the worst air quality and dust pollution in Melbourne for many years (8th worst air</p>

Issue	Description
	<p>pollution hotspot in Australia according to the Environment Justice Australia – “Clearing the Air” report 2014).</p> <p>Also, due to the lack of freeway access ramps at Grieve Parade, north south connectivity to the M80 is very restricted.</p> <p>Hobsons Bay City Council has called for new access ramps at Dohertys Road to be included with the Outer Suburban Arterial Road program duplication works to improve local industry connectivity and freight movement efficiency. This has not been adopted by VicRoads in the duplication works or in the recent design of the M80 interchange with the West Gate Tunnel.</p> <p>LeadWest also has concerns about the negative impact that increased traffic through the Brooklyn Industrial Precinct will have on local industry, particularly given that current inadequacy of transport infrastructure in the Precinct.</p> <p>Specific transport issues within the Brooklyn Industrial Precinct include poor north-south connectivity, at grade freight rail, and an insufficient internal road network.</p>
<p><i>Trucks in Spotswood</i></p>	<p>Concerns remain about the West Gate Tunnel west bound ramp location due to:</p> <ul style="list-style-type: none"> • impact on the industrial land and Donald W McLean Reserve • noise impacts on local residents • use of Simcock Avenue and Stephen Street as access roads to the west bound ramp • safety issues at the Douglas Parade intersection due to poor sight lines. <p>Concerns remain about the traffic impact on Douglas Parade and Hyde Street.</p> <p>The ramps and associated signalisation will create localised congestion with the combined ramps carrying up to 5000 vehicles a day in 2031 including nearly 2000 trucks.</p>

Issue	Description
	<p>Traffic in Hyde Street (between Francis Street and the freeway) is expected to increase from 15,000 to 22,000 vehicles per day in 2031, including an extra 1850 trucks per day (from 1450 to 3300).</p> <p>It is suggested that design changes will be required to address this undesirable issue of freeway access from the local street network (e.g. intersection treatments, parking and local access consideration and truck curfews) should be considered in Spotswood to protect the local area from truck traffic short cutting through the area.</p> <p>East bound trucks from the Spotswood industrial area will be required to travel via Hyde/Francis/Whitehall Streets and Footscray Road to the Bolte Bridge due to 24-hour truck bans in Francis Street.</p> <p>LeadWest's council members have differing opinions on the exemption from truck bans for trucks travelling to and from the Spotswood Industrial Precinct via Francis Street so that they can continue to access the freeway ramps at Melbourne/Williamstown Road. The separate submissions of Hobsons Bay City Council and Maribyrnong City Council should be read to obtain the different perspectives on this issue.</p>

Freight on Rail, the Western Interstate Freight Terminal and the Port Rail Shuttle

There is a need to maintain and protect the strategic advantage of Melbourne's west in freight and logistics, which is threatened by congestion, market change and lack of sufficient infrastructure investment. Investment in this area will have the added benefit of locating additional jobs in Melbourne's west.

Truck traffic is one of the major drivers of the rationale for the construction of the West Gate Tunnel. The West Gate Tunnel Project highlights an opportunity to provide certainty to communities in Melbourne's west by provision and transition to a strategic freight network that does not rely on local residential streets. This includes construction of a Western Interstate Freight Terminal and a Western Freight Activity Centre, and the Metropolitan Outer Ring Transport Corridor, comprising both rail and road.

The volume of freight transport moving through inner west suburban streets and accessing the Port of Melbourne and the Dynon precinct is causing significant traffic congestion and pollution and reducing road safety.

Development of an interstate freight terminal in Melbourne's west is a long term strategic option which will:

- Significantly improve the capacity of interstate freight transport in the north-south and east-west national corridors connecting Melbourne
- Complement other improvements to the north-south intermodal rail supply chain with matching capacity and service level improvements
- Enhance national productivity by lowering the door-to-door cost of freight for interstate movements
- Create opportunities for urban renewal in the North Dynon area
- Reduce truck movements through Melbourne's inner west
- Improve rail access for port-related freight by removing many non-port freight movements from the Dynon precinct.

Although the West Gate Tunnel is expected to reduce freight movements in the inner west area, much of this impact could be further enhanced if the Victorian Government supported the early establishment of the Western Interstate Freight Terminal (WIFT).

The WIFT is a key component of developing an integrated freight system for Victoria and the Australian eastern seaboard.

In 2009, the then Department of Transport with Australian Rail Track Corporation and rail operators Asciano and Queensland Rail made a submission to Infrastructure Australia on the WIFT.

Infrastructure Australia reported to the Council of Australian Governments in June 2010 that the WIFT was listed as having 'Real Potential'. Initiatives in this category clearly address a nationally significant issue or problem and, there has been a considerable amount of analysis of potential solutions.

In 2012, the potential location of WIFT was identified on the then Metropolitan Planning Authority's West Growth Corridor Plan, and it was also identified in the Western Melbourne Transport Strategy (prepared for the partnership of LeadWest and its six council members within the Western Transport Alliance).

In 2013, the WIFT was the subject of a joint pre-feasibility study, with the Victorian Government funding \$1.5 million and the Australian Government funding \$3.5 million. This \$5 million commitment recognised the strategic significance of the development and the need for strong partnerships across all tiers of government in its delivery.

The WIFT is identified in Plan Melbourne and other strategic planning documentation. Once the Victorian Government determines its preferred location, the Department of Economic

Development, Jobs, Transport and Resources will take further steps to preserve the land and access corridors required for the terminal in the relevant planning schemes and policies.

The WIFT would move freight more efficiently by providing modern terminal facilities closer to the large industrial cluster in Melbourne's west, reducing the time and length of truck trips through inner Melbourne to and from Port Melbourne.

The WIFT would also provide an opportunity to remove interstate containers from being railed to terminals adjacent to the Port of Melbourne, then trucked out to their destinations in the western suburbs.

The Department states that establishing the WIFT would potentially remove an additional 2,000 truck movements daily from the inner west and the need for trains and articulated trucks to bring interstate freight into the Dynon precinct.

In addition, LeadWest estimates the majority of the 10,000 truck trips along truck ban streets Francis, Somerville and Buckley streets involve the transport of shipping containers which are being transported to and from the port to empty container parks located in Tottenham, Brooklyn, West Footscray and Yarraville.

As this type of trucking usually involves slim profit margins, often the vehicles are old and poor quality, worsening the impacts on communities.

Developing the WIFT and associated freight activity centre would enable container parks to be relocated and the transport of both full and empty containers to the port occur via rail.

The potential location of WIFT in a future industrial area also provides more direct road freight access to the many logistic and warehouse destinations located along the Western Ring Road.

In the short-term, the Victorian Government could also act on the Port Rail Shuttle (Metropolitan Intermodal System) project.

In 2014, the Australian Government provided \$38 million to the Victorian Government to be combined with \$20 million in Victorian Government funding and additional private source funding to enable targeted infrastructure works to be undertaken to support development of a Metropolitan Intermodal System.

The Port Rail Shuttle (Metropolitan Intermodal System) project would provide an alternative to the current 100% road based container transfer system in Melbourne.

For the Port Rail Shuttle (Metropolitan Intermodal System) project, the Victorian Government has budgeted for provision of the \$58 million towards assets and project facilitation and the private sector would contribute assets, operate the system and take the operational and business risk.

Future proofing for WestLink

Anecdotal feedback from the business community in Melbourne's west is that investment has been held back in the Brooklyn Industrial Precinct due to the uncertainty about the WestLink alignment, and more broadly that there is an ongoing need for WestLink in addition to the Western Gate Tunnel to meet the growing need for improved connectivity and freight movement in Melbourne's west.

There is a continuing need for the WestLink project to connect the City Link to the Western Ring Road.

The business case for Western Distributor identified that WestLink needs be constructed within a 10 to 15-year period. It is imperative that the Victorian Government identifies and confirms the preferred alignment through a reservation to provide certainty to the business community within the state significant industrial precinct of Melbourne's west.

The establishment of a reservation will help direct investment into appropriate locations, and ensure that the land is available when it is required. The establishment of a reservation for WestLink should also consider the rail access alignment for the WIFT.

Health and amenity

Significant concerns are held by LeadWest and local communities regarding the project-wide impact to health and amenity.

Physical environment

LeadWest perceives the key physical environment risk of the project to be management of spoil and contaminants.

Spoil Quantities

It is expected that the construction of the West Gate Freeway expansion, the construction of the tunnels and portals, and the construction of connections to CityLink and the Port of Melbourne will generate the following amounts of spoil:

Table 9: Types and estimated quantities of spoil

Types of spoil	Estimated quantities of spoil
Fill material	1,654,000 m ³
Prescribed Industrial Waste – Category C	156,000 m ³
Prescribed Industrial Waste – Category B	14,000 m ³
Prescribed Industrial Waste – Category A	3,000 m ³
Acid sulphate soil / rock	85,000 m ³
Solid inert waste	198,000 m ³
Total	2,110,000 m³

Management of Spoil

Table 10 sets out LeadWest's understanding of the issues involved in management of spoil generated by the project.

Table 10 Management of spoil

Types of spoil	Management Issues
Fill material	<p>A majority of the spoil is expected to be clean fill. This can be soil, gravel and rock. The Environment Effects Statement does not regulate the use of fill material as it is not considered to be waste.</p> <p>Periodic checks should be undertaken of excavated material to see if it is clean fill, or contaminated (see categories below).</p> <p>Clean fill can be used as part of the project construction such as landscape mounds and infill for ramps, or taken to a landfill site away from the project.</p>

Types of spoil	Management Issues
Asbestos	<p>It is expected that some asbestos may be found during excavation and tunnelling.</p> <p>Construction environmental management plans will need to include an asbestos management strategy that will identify asbestos identification, management and removal.</p> <p>The nearest landfills that are licensed to receive asbestos are Western Land Reclamation Pty Ltd in Brooklyn, BTQ Group in Bulla, and Hanson Landfill Services Pty Ltd in Wollert.</p>
Prescribed Industrial Waste	<p>Soil that is contaminated with elevated levels of metals such as arsenic are identified by the EPA as prescribed industrial waste.</p> <p>The EPA has three categories for contamination, each of which has a different remediation, storage, and disposal requirements. Category A is the most contaminated, and Category C is the least contaminated.</p> <p>Construction environmental management plans are required to be developed that will provide a detailed assessment prior to any excavation to identify the location, types and extent of contamination, and the management of this soil to mitigate health and environmental risks.</p> <p>The construction environmental management plans will need to create procedures for:</p> <ul style="list-style-type: none"> • Characterising soil prior to disposal or reuse. • Identifying suitably licensed facilities for the disposal of potentially contaminated soil. • Management of dust and stormwater run-off from stock-piled materials. <p>It is recommended that that the construction environmental management plans should be expanded to include the transport routes and contaminated soil transport guidelines to ensure contaminated soil is dealt with in a safe and efficient manner.</p>
Prescribed Industrial Waste – Category A	<p>This is the highest class of hazardous waste. This cannot be disposed of to landfill without being treated.</p> <p>Management options are on-site remediation, off-site remediation or storage pending the availability of treatment. These matters would</p>

Types of spoil	Management Issues
	<p>need to be addressed in the construction environmental management plans.</p> <p>The soil will need to be remediated and disposed of as a Category B or C spoil.</p> <p>LeadWest requests more information on where off-site remediation may occur, as the transport, storage and remediation processes for this soil, if not properly managed, could result in poor health outcomes for people in our region.</p> <p>The Environment Effects Statement should clearly identify where these processes may occur.</p>
Prescribed Industrial Waste – Categories B and C	<p>Soils in these categories can be disposed of at appropriately licensed landfill facilities.</p> <p>Management options are on-site remediation, off-site remediation or disposal to a licensed facility. These matters would need to be addressed in the construction environmental management plans</p> <p>There are four landfill sites that are capable of receiving Category C soil in the northern and western suburbs. They are Boral Recycling Pty Ltd in Ravenhall, Western Land Reclamation Pty Ltd in Brooklyn, Hi-Quality Products Pty Ltd in Bulla, and Hanson Landfill Services Pty Ltd in Wollert.</p> <p>There is only one Category B soil facility in Melbourne – the SUEZ landfill in Lyndhurst in Melbourne’s south-eastern suburbs. It may be required to treat Category B soils to be disposed of as a Category C soil.</p>
Acid Sulphate Soil / Rock	<p>Acid Sulphate soil and rock contains higher concentrations of iron sulphides, and some of this can create sulphuric acid when exposed to oxygen.</p> <p>If not managed properly this soil can pose a risk to human health, buildings, structures, and the environment.</p> <p>These soils and rocks are expected to be found around Stony Creek.</p> <p>Prevention of acid generation is the preferred management option. Acid sulphate material can only be disposed of or re-used on sites approved by the EPA or at a landfill with the appropriate license.</p>

Types of spoil	Management Issues
	Acid sulphate material needs to be dealt with using the Industrial Waste Management policy (Waste Acid Sulphate Soils) which establishes a statutory framework for their identification, assessment and management.

Transport of Spoil

Spoil is expected to be taken by truck from the tunnelling and road expansion / connection projects along the West Gate Freeway:

- Clean fill will use the Princes Freeway to the Wyndham landfill site, the Western Ring Road / Deer Park Bypass to Melton landfill site, and the Western Ring Road to landfill sites located in Hume and Whittlesea.
- Prescribed Industrial Waste soil will use the Western Ring Road / Deer Park Bypass to the Ravenhall landfill site in the City of Melton, and the Western Ring Road (M80) to landfill sites located in the Cities of Hume and Whittlesea.

The Environment Effects Statement Transport Report indicates that 600 heavy vehicles per day will use the West Gate Freeway corridor related to the construction works. Given the high volumes of traffic that use this corridor this will represent approximately a 3% increase of truck movements per day.

The Environment Effects Statement requires construction transport management plans to be prepared by the contractors. The traffic management plan will need to identify how traffic generated from the construction of the project will be dealt with, including the identification of construction traffic routes, and mitigation measures such as the hours of operation of construction traffic.

It is critical that the construction environmental management plans and the traffic management plans identify the locations of appropriate landfill sites for the different types of spoil being removed (such as clean fill and prescribed industrial waste), the transport routes to get to each of the landfill sites, and transport guidelines to facilitate the safe transport of the spoil.

Cumulative Impacts

Construction of the West Gate Tunnel Project will overlap with construction of the Melbourne Metro Tunnel.

The Environment Effects Statement has considered the indicative volumes of all four tunnels and the capacity of landfill sites in the northern and western regions of Melbourne, and have concluded that there is sufficient capacity in the landfill sites to deal with the cumulative volume of soil.

Table 11: Quantity of spoil from West Gate Tunnel and Melbourne Metro Tunnel projects

Type of spoil	West Gate Tunnel	Melbourne Metro Tunnel
Fill material	1,654,000 m ³	1,349,300 m ³
Prescribed Industrial Waste – Category C	156,000 m ³	91,400 m ³
Prescribed Industrial Waste – Category B	14,000 m ³	26,100 m ³
Prescribed Industrial Waste – Category A	3,000 m ³	15,700 m ³
Acid sulphate soil / rock	85,000 m ³	551,000 m ³
Solid inert waste	198,000 m ³	-
Total	2,110,000 m³	2,033,500 m³

LeadWest seeks clarification on whether the capacity of the landfill sites has been determined on their approved sizes, or whether the capacity relies on the application currently being considered by the Minister for Planning to expand the existing Ravenhall landfill site from 133 hectares to nearly 450 hectares.

LeadWest recommends that the determination of capacity in landfill sites should be based on approved capacities only.

In general terms, Wyndham can accommodate around 200,000 m³ of clean fill material per annum, 50,000 m³ of clay rich material for intermediate capping and 100,000 m³ of construction clay material but only under an existing exclusive contract with Eastern Plant Hire/Eastern Soils Group for the provision of fill material to the Wyndham Refuse Disposal Facility. This legally binding contract expires in September 2018, which means that any material from the project

would probably have to come to the Refuse Disposal Facility via Eastern Plant Hire/Eastern Soils Group.

The Wyndham Refuse Disposal Facility can only take certified clean soil – for a large project like the West Gate Tunnel this means spoil will need to be accompanied by environmental testing reports which demonstrate the material meets EPA levels for clean fill.

The Wyndham Refuse Disposal Facility cannot accept any contaminated soil or associated material. This would currently extend to acid sulphate soils.

It is recommended that:

- The construction environmental management plans should clearly identify where off-site remediation of Prescribed Industrial Waste, Category A spoil will occur, and how the spoil will be transported there, stored and treated.
- The capacity of existing landfill sites in the north and west of Melbourne should be based on approved capacity of these sites only, and should not rely on the capacity of these sites which have not been approved.
- The Construction environmental management plans for excavation, and transport management plans for the projects, should be expanded to include:
 - the identification of appropriately licensed landfill sites suitable for the different classes of spoil;
 - the identification of transport routes to each of these licensed landfill sites; and
 - guidelines for the transportation of contaminated material to these landfill sites.

Community

Rapid Population Growth

Over the past decade all the communities of Melbourne's west, whether suburbs established in the 19th century, middle ring districts or growth areas, have experienced strong growth.

The resident population of Melbourne's west increased from 611,512 people at the 2006 Census by 28.3% to reach 716,510 people at the 2011 Census.

The residential population growth of 4.3% per annum in Melbourne's west between the 2006 Census and the 2011 Census was almost double Victoria's population growth rate for the same period.

The 2016 Census reveals that the population of Melbourne's west sustained strong growth and reached 834,621.

Consequently, the residential population growth of Melbourne's west between the 2011 Census and 2016 Census was 3.3% per annum.

According to Plan Melbourne, Melbourne's west is expected to accommodate 40% of the metropolitan growth over the next 40 years.

Melbourne's west is expected to more than double in size to a population of 1,758,000 people by 2051, which will make the population of Melbourne's west the equivalent size of the current populations of Adelaide and Canberra combined.

This is an average increase of population of 2.9% per annum over the next 35 years.

Plan Melbourne

Planning should be undertaken to aim for greater self-containment of job opportunities for the population of the western suburbs.

Melbourne's Metropolitan Strategy – *Plan Melbourne 2017-2050* (Plan Melbourne) – identifies suitable locations for the public and private investment that will result in an increase in the number of jobs in Melbourne's west.

Without adequate investment in job creation in Melbourne's west, people in the outer western region will need to travel to work in the inner west or locations east of the Maribyrnong River. The capacity created in transport corridors – such as the construction of the West Gate Tunnel, the duplication (and eventual electrification) of the Melton Rail line, and improvements to the Ballarat/Geelong/Werribee rail corridors – will be quickly outstripped by demand.

Plan Melbourne identifies the need to significantly expand the size of the Western Industrial Precinct, which is one of five state-significant industrial precincts in Melbourne. The extended Western Industrial Precinct will be the largest of these precincts.

Plan Melbourne also identifies that the Western Industrial Precinct will be serviced by the future construction of the Outer Metropolitan Ring Road and Rail corridor, and the Western Interstate Freight Terminal (WIFT).

The WIFT will receive containers from the Port of Melbourne and the proposed second container port at Bay West, and place them on interstate trains.

The Australian Government is commencing the construction of the Melbourne to Brisbane Inland Rail project. There is an opportunity for the WIFT to be the Melbourne terminal for the Inland Rail.

Plan Melbourne also identifies significant investment opportunities at:

- Two National Employment and Innovation Clusters in Melbourne's west at Sunshine and Werribee;
- Two existing Metropolitan Activity Centres at Footscray and Sunshine; and
- The establishment of a new Metropolitan Activity Centre at Toolern (in the City of Melton).

Consequently, LeadWest calls upon the Victorian Government to:

- Invest in the development of the identified National Employment and Innovation Clusters at Sunshine and Werribee;
- Plan for employment growth, and invest in the development of the Metropolitan Activity Centres at Footscray and Sunshine;
- Invest in the development of the Toolern Metropolitan Activity Centre, including the construction of the Toolern train station;
- Make a determination on the role, size and location of the WIFT;
- Prepare the Precinct Structure Plans for the area around the WIFT to unlock this land;
- Commence the establishment of the WIFT, which will generate employment around the WIFT;
- Commence planning on how shipping containers will be transported between the Port of Melbourne and the WIFT; and
- Commence planning for the Outer Metropolitan Ring Road and Rail corridor, specifically connecting the WIFT to the proposed Melbourne to Brisbane Inland Rail.

It is critical that the Victorian Government plan for employment growth in Melbourne's west, and invest in infrastructure that will stimulate further private investment resulting in growth of employment opportunities in the region, otherwise the capacity created in the current transport systems will be quickly taken up and congestion will still exist.

Job creation in the western region will help to reduce stress on transport systems in the west as people in the outer west will have greater opportunity to work closer to home, have the capacity to travel less distance, and possibility of greater contraflow travel patterns that reduce city and inner city bound travel are created.

We support the construction of the West Gate Tunnel Project, as this will improve access to employment for residents in the western suburbs of Melbourne in the short term by relieving congestion and providing a much needed second crossing of the Maribyrnong River.

However, LeadWest is of the view that unless more employment opportunities are provided in the western suburbs, the capacity created in the transport corridors to the inner city will be quickly filled as large numbers of people in the outer western areas of Melbourne travel to the inner west or areas east of the Maribyrnong River for work.

Employment Opportunity

Employment growth in Melbourne's west is not keeping up with population growth. According to Plan Melbourne, forecast employment growth in the region is expected to be 2.3% per annum, whereas population growth is forecast at 2.9% per annum.

The jobs gap is disproportionately felt by the populations of the Cities of Wyndham and Melton, which are experiencing much higher population growth rates of 5.7% and 4.4% respectively.

LeadWest has used the REMPLAN economic modelling tool to identify that there are 201,098 jobs in Melbourne's west for the 322,474 people who are employed and reside in the communities of Melbourne's west. Clearly, Melbourne's west is at present an exporter of labour.

85% of workers employed at locations in Melbourne's west travel to work by car as a driver or a passenger, whilst 75% of people resident in the suburbs of Melbourne's west travel to work by car as a driver or a passenger.

Unemployment in Melbourne's west (7.4%) is higher than the Victorian (5.7%) and Australian (5.5%) rates.

Location of Employment

It is critical that work be undertaken to generate employment growth in the western suburbs to provide work close to service the large population growth occurring in the Cities of Melton and Wyndham.

There is a large cost for families and individuals when employment is not available close to where they live. There is the cost of owning multiple private vehicles and their operation, and the cost of time spent away from home and family to travel to work.

Procurement

The project plan should also include positive procurement policies within contracts for supplies, services and employment that delivers positive social benefits to Melbourne's west.

The unemployment rate in Brimbank alone is 10.14% (December 2016) and will be further impacted by closures in the automotive sector later this year.

There is an opportunity to pursue positive discrimination policies to ensure that the economic impacts of constructing the West Gate Tunnel deliver real social benefits to Melbourne's west and support pathways to employment and jobs growth for local industry.