

Submission to the West Gate Tunnel Project Inquiry and Advisory Committee on the Environment Effects Statement (EES) — Revision 1, 15.9.17

An unsustainable plan for Melbourne

I [support](#) the City of Melbourne's submission that the West Gate Tunnel Project (WGTP) is contrary to its policies and plans for traffic management and other improvements to the city's environment and that the WGTP should not be [endorsed](#).

The WGTP is an overworked, unnecessarily large project based on obsolete ideology that believes traffic congestion can be addressed by building more roads. It has long been recognised that new road networks do not address traffic congestion; they merely attract more road users.

This project has expanded from the fairly modest plan known as Western Distributor designed to get trucks out of residential Yarraville streets to a far more intrusive and potentially destructive development — devised entirely by a private company that hopes to profit financially from toll roads and corporately by dominating transport planning in Victoria. Instead of distributing traffic away from the central city, the WGTP appears to concentrate traffic in inner Melbourne, increasing vehicle volumes in North Melbourne, West Melbourne, Parkville and Docklands. New roads should bypass urban centres, not funnel traffic into them!

It is unclear whether the WGTP would create physical impediments to public transport projects including Melbourne Metro 2, the airport rail link [and](#) rail or light rail to the Doncaster area [and tram route extensions](#). However, the massive expenditure on the WGTP would undoubtedly divert funding away from these projects and delay them for many years, probably decades.

Effect on inner-urban renewal sites

The proposed elevated roads, besides being unsightly, would have a suffocating effect on City of Melbourne plans for residential, commercial, recreational and park developments on inner Melbourne sites described as E-Gate, Arden and Dynon. Roads on huge stilts — both the one over and along Footscray Road and the Wurundjeri Way extension — would act as barriers that divided communities. The WGTP does not integrate appropriately with planned land uses in inner Melbourne, and the EES fails to assess this impact or suggest ways to ameliorate it.

Adverse effect on West Melbourne Structure Plan

The draft West Melbourne Structure Plan is a City of Melbourne scheme that has genuinely engaged residents and business owners in West Melbourne. It is a comprehensive plan to enable further population growth while encouraging a diversity of architectural types and mixed uses, keeping a lid on excessive heights, addressing the lack of open space by repurposing some streets as green corridors, and increasing tree canopy cover.

All this is threatened by the proposed WGTP.

Wurundjeri Way and West Melbourne

A late inclusion, for what appears to be no good reason, is the Wurundjeri Way extension. As a West Melbourne resident, I am well placed to comment on this. A six-lane elevated road running above the E-Gate urban renewal area would compromise future development of this site. Who would choose to live in its shadow? As [others have](#) pointed out, it would also place a barrier between West Melbourne, E-Gate and Docklands, destroying plans to provide essential connections between these suburbs. It would also undermine plans under the West Melbourne Structure Plan to beautify Railway Place and provide pedestrian and bicycle links from there to Docklands.

The Wurundjeri Way extension would pass within 80–110 metres of Railway Place residences. The maximum noise level predicted for Railway Place has been modelled as 60 dB(A). The VicRoads standard to be achieved is 63 dB(A). This allows very little leeway. Should noise volumes increase, with bigger trucks for example, sound barriers would have to be retrofitted. Yet

no “noise barriers that mitigate traffic noise and as a consequence protect private and community spaces” (page 34, EES Summary Report) have been considered for West Melbourne.

Nor has any attempt been made to improve the visual amenity, whereas, further west, attractive wall and barrier treatments have been incorporated to mitigate visual, aural and pollution effects.

Transurban specialists and City of Melbourne personnel agree that the height of the road where it crosses over Dynon Road would be 20–21 metres. The road slopes down from there to the south-east to cross above Dudley Street next to the railway tracks and would thus be highly visible from Railway Place and nearby streets. Emissions from an estimated 9000 vehicles using this flyover would add to the PM₁₀ and PM_{2.5} particulates emitted by the 150–200 Regional Rail Link diesel trains that pass daily within 12–14 metres of Railway Place dwellings, further reducing air quality.

When the Regional Rail Link changed its original design and decided to use the substandard North Melbourne rail flyover and tracks next to Railway Place to carry up to 200 diesel trains a day, West Melbourne residents protested. In 2012 we became aware of the World Health Organisation’s reclassification of diesel emissions as a Class 1 carcinogen. It also stated that there was no safe level of this pollutant.

Now we learn from Dr Diane Keogh (Spotswood South Kingsville Residents Group, Submission No. 326) that particulate matter affects air quality up to 300–400 metres from its source, and from Christine Harris (Submission No. 217) that ultra-fine particulate matter PM₁ and below travels further than PM_{2.5}. The EPA does not even measure PM₁ — a highly injurious substance because of its ability to penetrate the lungs — but insisted in 2012 that air quality in West Melbourne was well within accepted standards.

Traffic modelling in West Melbourne and North Melbourne

While some experts say traffic modelling is an inexact science and tends to overestimate numbers considerably, the following EES forecasts are highly relevant to livability in these suburbs. A few North and West Melbourne streets are forecast to experience reductions in traffic volume but most show worrying increases. The figures below represent the ‘with project’ scenario in 2031 compared with ‘no project’ in 2031.

Dynon Road (between Dryburgh Street and CityLink): +9000 vehicles per day. Although traffic in Spencer Street is forecast to reduce, this is somewhat misleading, as Dynon Road is the continuation of Spencer Street.

According to City of Melbourne analysis, the Dynon Road/WGTP connection would feed traffic into the North and West Melbourne road network, resulting in peak-hour conditions for 12–14 hours a day along some streets. This increased vehicle volume would presumably prevent the suggested extension of the Spencer Street tramline towards Footscray and jeopardise City of Melbourne plans for a ‘Spencer Street village’ [as part of the West Melbourne Structure Plan](#).

Hawke Street: +5000 (Spencer to Victoria streets)

Curzon Street: +2000

Victoria Street: up to +3000.

These are traffic volumes that cannot be sustained. Residents have long been concerned at the number of accidents in the Hawke/King/Victoria/Curzon area, the worst being the hit-and-run death of a young woman in 2016. The new Hawke+King apartment development will add to car numbers at this dangerous intersection. [We can probably say goodbye to City of Melbourne’s proposed linear park in Hawke Street if the WGTP proceeds.](#)

Victoria Street would empty more traffic into the CBD or, together with increased volumes in Queensberry and Grattan streets, spill more vehicles into Parkville. The proponent considers this

desirable, to provide access to the medical and university precinct, but why would that be so when Melbourne Metro 1, with a station in Parkville, is due to come on stream in 2026?

Arden Street: up to +3000. This would have a detrimental impact on construction of the new Metro station at Arden and on the Arden urban renewal area in the future.

Wurundjeri Way: +9000 Dudley to La Trobe streets, +6000 La Trobe to Flinders streets. Flinders Street, with its concentration of trams, would not cope with the extra traffic resulting.

These conditions would have a negative effect in North and West Melbourne on walkability, increasing noise levels and making it harder to cross roads. Buses, whose services will need to be greatly expanded to connect the new urban renewal areas in future and to support pedestrians, would also be affected, and performance of the Nos 57, 58, 59 and 19 trams would deteriorate further.

With the announcement of a new primary school for Docklands on Footscray Road near Dudley Street, safer crossings are imperative. North Melbourne Primary School has several hundred more students enrolled than it is built to cater for, and a new school in Docklands will be a great alternative for West Melbourne children. However, the Dudley Street/Footscray Road intersection is extremely hazardous. Yet the WGTP offers no improvement to this.

Veloway

The veloway along Footscray Road is poorly designed, its close proximity to a motorway subjecting cyclists to vehicle emissions. With enclosed sides and appended to a huge construction, the path would make for a noisy, claustrophobic ride. The veloway is too narrow to allow for breakdowns and for faster riders to overtake slower ones safely and there are not enough emergency exit points (if any). Also, the exit from the veloway would be next to the Docklands school, creating another hazard as cyclists sped down the ramp.

Impact on Moonee Ponds Creek

The Dynon Road/WGTP interchange would result in a 'spaghetti junction' in the sensitive Moonee Ponds Creek area. Pier construction, overshadowing and possible pollution would further damage this important waterway, which is already affected by noise and lack of sunlight caused by CityLink. The potential benefits from augmented open space along the creek are, in my opinion, overstated. Additional open space may not even eventuate, depending on ownership of the land.

Maribyrnong River

The Maribyrnong River would suffer environmentally from 'bank widening'. Piers would be sunk in the river to support the new bridge. What effects might this have on significant river life such as eels and the Australian grayling? Tollway exit ramps would compromise the open-space corridor of the river, which provides rare walking and cycling opportunities. Access to waterways in the inner western suburbs is precious for its recreational value and the nourishment that nature provides.

Tunnel trade-offs

I understand from residents of Yarraville and Spotswood that the elimination of trucks from Francis Street achieved by building the tunnel and imposing a curfew on local streets would be at the expense of Millers Road and Blackshaws Road, which would experience a commensurate increase in traffic as it emerged from the tunnel portal. If that is correct, the project would thus provide no net benefit to these suburbs. Also, the ramps as designed would pass through an industrial area earmarked for residential development.

Other matters

- No party seems to have addressed the issue of Dudley Street, its safety and its changed routing through Queen Victoria Market. Transurban says this is a City of Melbourne matter.

- Transurban representatives say widening the section of Wurundjeri Way between Dudley Street and Flinders Street will not preclude the laying of an extra railway track along here to Southern Cross Station in the future. This needs to be verified.
- The problem of congestion at the ports should be addressed with rail freight options, not increased truck movements.

Conclusion

It is my submission that the West Gate Tunnel Project should not go ahead. If it does go ahead, the Dynon Road ramps and the Wurundjeri Way extension should be deleted.

Public transport use is far more environmentally and socially responsible than encouraging greater private vehicle use. It is also more economically viable. Available funds should be spent on public transport projects, not on propping up private road developments of doubtful merit.

One of the project engineers at a WGTP pop-up information booth referred to the North Melbourne flyover as “the worst piece of rail infrastructure I have ever seen”. If the Wurundjeri Way extension goes ahead in its present form, people could well be saying: “This is the worst piece of road infrastructure I have ever seen.”

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