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WEST GATE TUNNEL PROJECT INQUIRY AND ADVISORY COMMITTEE

SUBMISSION BY:

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Introduction

1. The Planning Institute of Australia (PIA) is the national body representing planning and the planning profession. PIA currently represents approximately 5,300 members nationally and internationally, and connects with more than 7,500 planners annually. We are governed by a National Board of Directors and managed by a professional administration. We are a Not For Profit, member-based organisation with management complemented by volunteers, who support and contribute to our activities on various levels.
2. In our original written submission, the Planning Institute of Australia (Victorian Division) (PIA) acknowledged that the strategic justification for the West Gate Tunnel project correctly identifies some of the key land use and transport issues which the city must address. However, in proposing the West Gate Tunnel as the solution, inadequate consideration has been given to alternate solutions. Testing of alternate solution is fundamental to a robust Environmental Effects Statement (EES) process. This project therefore raises the following questions:
 - Is another road the answer?
 - Does this add to the sustainable long term planning outcomes we want to see for our city?
 - Why are we not spending this money to increase capacity and frequency of trains and other modes of transport that service the west?
3. This submission responds to the above questions and further explores each issue raised in our original submission.

Strategic Justification

4. PIA believe that easing the current (on-road) squeeze by increasing road capacity may lead to temporary relief but will ultimately:
 - Creates a bigger scale of problem once this additional capacity is filled.
 - It is a very expensive project, regardless of who pays for it, which will only temporarily ease congestion, while contributing nothing to reducing the source of the problem (growing road-based demands). In fact, it will stimulate growth of the problem through inducing demand, in the absence of adequate alternative transport options. It is a short-term solution to a long-term problem.
 - The money would be better spent investing in alternative infrastructure to provide additional transport options, recognising the different needs of freight and commuter traffic, that provides alternatives that reduce the growth in demand for road space.
5. The West Gate Tunnel Project EES documentation does not provide sufficient information to allow alternate options to be comprehensively compared, however we can be sure that additional roads and traffic do not contribute to achieving the sustainable, liveable city that strategic planning policies seek to achieve.
6. PIA has identified some of the alternate transport solutions that should have been considered more comprehensively as part of the EES process, which could contribute to achieving the same strategic objectives without the same 'hangover'.

Alternate Transport Solutions

7. There are three broad transport options to address the problems identified by the EES:
 - Increase supply
 - Reduce demand
 - Use existing assets more efficiently
8. A solution could be a combination of these options. Ultimately our city needs a combination of options that best meets the strategic objectives for the future of Melbourne and can be realistically delivered.
9. I table some examples of the various potential responses. These have not been tested but provide a range of means to meet solve the problems underpinning the proposed project (Attachment 1)
10. In identifying appropriate transport responses, there is a need to consider objectives and principles of the Transport Integration Act (TIA) as identified below. The TIA supports an integrated triple bottom line approach to allow decision makers to consider a full range of policy goals.

Objectives

1. Social and economic inclusion
2. Economic prosperity
3. Environmental sustainability
4. Integration of transport and land use
5. Efficiency, coordination and reliability
6. Safety, health and wellbeing.

Principles

1. Integrated decision making
2. Triple bottom line assessment
3. Equity
4. Transport system user perspective
5. The precautionary principle
6. Stakeholder engagement and community participation
7. Transparency

(Summary of objectives and principles of the TIA)

11. The West's transport network problems are complex and are specifically characterised by:
 - Heavy car reliance in the growth corridor
 - A poorly developed arterial road network in the west compared to the east's dense grid (Attachment 2).
 - A poorly developed high capacity, on road public transport network in the west compared to the rich grid of trams and high frequency buses in the east and north.
12. PIA believes a range of interventions will be required to assist in resolving this issue, based around a mix of the options identified in Attachment 1. Single solutions are unlikely to work, especially if the solution is likely to exacerbate the symptoms of the problem you are trying to solve.
13. In response to the solution that has been proposed as the West Gate Tunnel, we note that:

- The proposed tunnel will be 4km in length, westbound and 2.8km, eastbound. PIA recommend a longer tunnel is constructed to avoid the proposed 2 levels of traffic.
14. Our evolving city already has a number of tunnels serving a similar purpose to effectively ensure the fastest and most efficient movement for different modes of transport.
- Burnley tunnel is 3.1km in length and travels under the city and the Yarra River.
 - Domain tunnel is 1.6km same.
 - Melba and Mullum Mullum Tunnels - These two parallel tunnels are located at the northern end of EastLink (M3) in Melbourne's eastern suburbs. Each tunnel is 1.6 kilometres in length and consists of 3 traffic lanes, which burrow up to 53 metres under Mullum Mullum Park in the suburb of Donvale.
 - City loop is 10km in length.
 - Melbourne metro will be 9km in length and will go under the Yarra River.
15. In order to ensure minimal impact, an extended tunnel diverted around the city should be considered.

Impacts of the Proposal

16. As currently designed and proposed, there are a number of aspects of the West Gate Tunnel project that PIA consider to be unacceptable.

Traffic

17. The project provides a possible way to address some issues facing the increased road congestion facing the west, but does not consider wider network issues and land use impacts outside of the project area. PIA believe that the project in its current form will:
- Exacerbate demand for motorways and peak hour travel.
 - Fail to provide sustainable alternative modes of transport for the broader catchment.
 - Encourage single occupant car trips into one of the most economically productive parts of Australia and lead to delays in investment in other efficient forms of transport.
 - Fail to support more efficient freight movements but instead will divert this traffic through the part of metropolitan Melbourne expected to undergo significant growth and change, which will lead to competing demand for the transport network.
18. In addition, as stated in our written submission, the methodology outlined for the traffic modelling (Section 3.4 of Technical Report A Transport) suggests to be only for the year 2031, which will only be a few years after the completion of the project, if it were to proceed.
19. For a major city shaping project, modelling should take into account the long-term effect on traffic volumes, at least within the timeframes envisioned by Plan Melbourne, and the increased network demand this extra capacity will induce over time.

E-Gate & other strategic sites

20. The E-Gate precinct provides 20ha of prime land within 1km of Melbourne CBD and is anticipated to be home to 10,000 residents.
21. As confirmed in our written submission, the proposed project will cause major implications to the future development of this precinct. Although not yet developed, we cannot completely ignore such a vast strategic redevelopment site within such close proximity to the CBD when we are dealing with a growing population in Melbourne year on year. The proposal at hand would not allow for good planning outcomes to be achieved on this land.
22. E-Gate is identified in the latest iteration of Plan Melbourne 2017-2050 as an urban renewal precinct. Action 3 of the Five-Year Implementation Plan in Plan Melbourne identifies the need for a long-term land use and infrastructure plan, which the VPA, DELWP, DEDJTR and the City of Melbourne will undertake.
23. E-Gate is also identified in the Melbourne Planning Scheme (cl.21 14-3) as a proposed urban renewal area.
24. In addition, no consideration has been made to the other significant infrastructure projects already underway such as Melbourne Metro with a new station proposed at Parkville linking the Biomedical Precinct that will connect to the new Arden precinct via a new station at Arden.

Visual Impact and Amenity

25. It is proposed to install noise barriers within sensitive areas of the project. Although these may be of high quality, they are a visual eye sore. No design consideration has been made to reduce the impact of these incredibly high barriers to existing residents abutting them or what potential future re-development sites can do to reduce their impact.
26. Understandably we are dealing with the matter at hand however, we cannot neglect the fact that these areas will be re-developed in the future and the impact that this project will have on them.
27. PIA is of the opinion that the proposed veloway and 14km of improved cycle and pedestrian pathways is a tokenistic gesture. This part of the city currently benefits from excellent cycle paths into the city, one of which has just been upgraded over Footscray Road bridge. It would seem unnecessary to add to this.

Urban Design

28. As discussed, the project fails to acknowledge fundamental land use planning elements such as the integration of future urban renewal development opportunities.
29. In addition, no consideration has been given to the existing strategic work that has been completed on these significant urban renewal precincts, including integration of the proposed design with the current West Melbourne Structure Plan; Arden Macaulay

Structure Plan; and Floor Space and Use Capacity Studies of industrial West Melbourne, E-Gate and Arden Macaulay.

30. Open space opportunities also appear to be tokenistic, primarily when viewed from the road but are limited in their active recreational value. This can also be said for the integration or mitigation with Moonee Ponds Creek Environs.
31. As detailed design has yet to be completed, the project lacks any detailed visualisation to an appropriate scale, such as streetscape elevations. PIA is therefore unable to interpret the actual visual impact of the project but can only respond to indicative imagery.

Conclusions

32. PIA acknowledge that the Terms of Reference of the Advisory Committee are limited, but urge you to maintain a strategic view in your consideration of the project. In particular, in relation to how this project may contribute to or, hinder the achievement of land use goals and broader social, economic and environmental outcomes, including the impact on car dependence, freight modal share and access to employment.
33. Support for such a significant, city shaping infrastructure project should be premised on delivering the objectives of the relevant Acts, which include:
 - *To secure a pleasant, efficient and safe working, living and recreational environment for all Victorians and visitors to Victoria (Planning and Environment Act 1987; s4(1)(c)).*
 - *The transport system should provide a means by which persons can access social and economic opportunities to support individual and community wellbeing including by (a) minimising barriers to access so that so far as is possible the transport system is available to as many persons as wish to use it (Transport Integration Act 2010, s8); and*
 - *The transport system should actively contribute to environmental sustainability by (b) avoiding, minimising and offsetting harm to the local and global environment, including through transport-related emissions and pollutants and the loss of biodiversity (Transport Integration Act 2010; s10).*
 - As delegated legislation, the State Planning Policy Framework seeks to ensure that planning policies and practices:
 - ...integrate relevant environmental, social and economic factors in the interests of net community benefit and sustainable development. (SPPF; Clause 10.02).*
34. PIA is firmly of the view that the EES does not adequately demonstrate that these objectives are achieved through the project as proposed.

ATTACHMENT 1

Transport Issues and Solutions

Problem	Increase Supply	Reduce Demand	Improve Productivity
Inadequate transport capacity on the M1 corridor	<ul style="list-style-type: none"> • Additional lanes on the M1 • Provide an alternative motorway route • Additional rail capacity on Werribee line 	<ul style="list-style-type: none"> • Tolls or transport pricing • Improve employment opportunities in the west • Better information and real time data • Enhance arterial road network in the west • Develop high capacity on-road PT network • Develop strategic cycling corridors • Better growth area public transport 	<ul style="list-style-type: none"> • Managed motorways • 9 carriage metro trains • Better rail signalling systems • Traffic signal improvements
Over-reliance on the West Gate Bridge	<ul style="list-style-type: none"> • Build a second road crossing of the river (note various options exist) • New rail tunnel (MM2) linking city and Fishermans Bend to the west 	<ul style="list-style-type: none"> • Tolls or transport pricing • Improve employment opportunities in the west • Relocate port infrastructure • Better information and real time data • Develop high capacity on-road PT network • Develop strategic cycling corridors • Better growth area public transport 	<ul style="list-style-type: none"> • Managed motorways • Strategic network planning to minimise conflicts
Inadequate port and freight connections to cater for growth	<ul style="list-style-type: none"> • Additional road access options • Metropolitan freight rail shuttles • Rail link to Webb Dock 	<ul style="list-style-type: none"> • Freight rail incentives or road pricing • Relocate port infrastructure • Suburban intermodal terminals 	<ul style="list-style-type: none"> • Develop HPFV network • Remove rail capacity constraints and bottlenecks (signals, bridge clearances)

Problem	Increase Supply	Reduce Demand	Improve Productivity
Reduced amenity in the inner west	<ul style="list-style-type: none"> • Road tunnel • Metropolitan freight rail shuttles 	<ul style="list-style-type: none"> • Freight rail incentives or road pricing • Truck bans and curfews • Relocate port infrastructure • Suburban intermodal terminals 	
Mismatch between land use and transport	<ul style="list-style-type: none"> • Increase accessibility to employment precincts in the west (e.g. Sunshine, East Werribee, Tullamarine) to attract business and employers • New rail tunnel (MM2) linking city and Fishermans Bend to the west • Additional lanes on the M1 • Provide an alternative motorway route 	<ul style="list-style-type: none"> • Improve growth area public transport • Develop high capacity on-road PT network • Develop strategic cycling corridors • Improve employment opportunities in the west 	<ul style="list-style-type: none"> • Increase densities around public transport in the west

ATTACHMENT 2

Satellite



(Source: Melways)