6 July 2017

CITY OF MELBOURNE

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Mr Nick Wimbush
Chair
West Gate Tunnel Project Inquiry and Advisory Committee

Dear Mr Wimbush

WEST GATE TUNNEL INQUIRY AND ADVISORY COMMITTEE

I am writing to you in your capacity as Chair of the West Gate Tunnel Advisory Committee.

The attached submission was formally endorsed by Melbourne City Council at its Future Melbourne Committee on 4 July 2017.

The City of Melbourne requests that the Inquiry and Advisory Committee consider the matters raised in this submission as part of the EES process.

The City of Melbourne plans to be represented at the Inquiry and Advisory Committee and will provide further evidence in support of this submission. The timeframes provided for the exhibition of the West Gate Tunnel Project are very limited. As a result, the City of Melbourne may seek to raise further matters in due course upon further consideration of the EES and Planning Scheme Amendment.

If you wish to discuss the above further please contact me on 9658 9835 or via email ben.rimmer@melbourne.vic.gov.au. Should your queries be of a technical nature, please contact Richard Smithers, Team Leader Transport Strategy on 9658 9535 or via email richard.smithers@melbourne.vic.gov.au.

Yours sincerely

Ben Rimmer
Chief Executive Officer

CoM reference DM 10941394

(Attachment – City of Melbourne Submission West Gate Tunnel Project)

CITY OF MELBOURNE SUBMISSION
WEST GATE TUNNEL PROJECT

TABLE OF CONTENTS

TABLE OF FIGURES

1. INTRODUCTION

Melbourne's central city is important to the prosperity and liveability of all Victorians.

As the location for the State's most important economic and cultural infrastructure, as well as major events, the central city is critical to the economies and communities of metropolitan and regional Victoria, and Australia. The City of Melbourne makes a major contribution to the Victorian and Australian economies, accounting for 25 per cent of the Gross State Product and 6 per cent of Australia's Gross Domestic Product. It hosts much of Victoria's employment growth and some of Australia's major universities and research institutions, including one of the world's largest biomedical precincts. It is home to the State's premier cultural and sporting facilities. All this is within walking distance or a short tram ride from the central city. The City of Melbourne will continue to attract international, national and regional visitors into its municipality each day.

In order for Melbourne to remain globally competitive over the next decades, the City of Melbourne must be able to meet the population's demands in a way that maintains and strengthens the City's renowned liveability and outstanding economic performance. A strong Melbourne economy is vital for Victoria and Australia. The City of Melbourne does not believe the West Gate Tunnel Project supports this future.

Melbourne's Growth Story

By 2051, it is anticipated that Greater Melbourne's population will have grown from today's 4.5 million to 8 million people. Within the City of Melbourne's municipal boundary, the current resident population is expected to double by 2036, with employment levels around 670,000 at this time. On any weekday, there are more than one million people in the central city.

The last thirty years has seen exponential growth in the central city, with its expansion from the Hoddle Grid to Southbank in the 1980's and Docklands at the turn of the century. Both areas are well on their way to reaching capacity. Over the next decades, historically industrial areas will be transformed into inner city mixed use neighbourhoods. The urban renewal area of Fishermans Bend, including the employment precinct, will be home to 80,000 residents and 60,000 jobs. Arden Macaulay, with a Melbourne Metro station at its heart, will accommodate 43,500 residents and 25,000 jobs in 2051. E-Gate has long been identified as an urban renewal area, a critical piece to stitch together Docklands and the central city. Along with other anticipated major development, E-Gate has the potential to provide significant green space along the Moonee Ponds corridor, which will also be critical to the successful renewal of the E-Gate, Arden and Macaulay precincts.

The Port of Melbourne is a very important part of economy of the city and the State. However, the city's growth is moving incrementally towards the west to the Maribyrnong River and Footscray. While the Port of Melbourne will remain in full operation for the foreseeable future, the Dynon area to its north is considered the next tranche of land that may be unlocked for renewal through rationalisation and modernisation of freight functions. Already landowners along the Maribyrnong River are seeking rezoning to enable mixed use developments. Across the Maribyrnong River, the Joseph's Road precinct has commenced development into a high density neighbourhood.

The city's waterways are central to its sustainable growth and identity. Investing in flood mitigation is essential, but as connected eco-systems - the Yarra, Maribyrnong River and Moonee Ponds Creek, must be cared for and celebrated as key environmental and recreational corridors.

Surrounding the central city are established and diverse residential and mixed use neighbourhoods, such as North and West Melbourne, East Melbourne and South Yarra. The capacity to accommodate significant growth in these neighbourhoods is limited because of their intrinsic character, heritage and built form controls. This reinforces the importance of the declared renewal and potential renewal areas being carefully planned, designed and enabled in order to deliver the required growth.

Places for People

Fundamental to the city's attraction and continued growth is the City of Melbourne and State Government's sustained investment in making Melbourne a 'place for people'. Melbourne is renowned world-wide for its pedestrian friendly streets and diverse cultural offer, great city parks, heritage and world-class contemporary architecture. This feature is a significant part of City of Melbourne's attractiveness as a destination for knowledge work, and it has not occurred by accident. For more than three decades, Melbourne has delivered strategies and projects, including Postcode 3000, which have enabled a thriving residential market in the central city; laying kilometres of bluestone paving on central city streets and establishing a high quality city palette of street furniture and lighting; investing in cycling infrastructure to make Melbourne a walking and cycling friendly city; establishing major parks and redesigning the way the city responds to the Yarra; planting thousands of trees to create the urban forest and opening up the historic laneways for retail use. Since 2011, Melbourne has been ranked number one in the world in the Economist Liveability Index and has gained a reputation as a progressive, creative and resilient city on the world stage. This in turn supports a thriving economy. In the last 15 years, the City of Melbourne has spent more than $230 million on engineering works to make our city's streets and spaces great places to be. Also the City of Melbourne has invested significant funds in green infrastructure, such as trees and water sensitive urban design. In the municipality's inner city neighbourhoods, the City of Melbourne has invested in improving the amenity of the residential streets; in many places turning 'grey to green' to provide the open space need by growing populations. In North and West Melbourne alone, the City of Melbourne has spent more than $20 million to reduce through traffic by approximately 20- 25 per cent since the late 1980s.

Intrinsic to all of this has been a shared goal that car use in the central city should not grow beyond existing levels, and ideally should decline gradually over time to make way for public transport, walking and cycling.

The West Gate Tunnel Project

Based on the importance of the central city, the growth needs of the City, and the city's commitment to make Melbourne a city for people, the City of Melbourne opposes the West Gate Tunnel Project, and its current alignment, scale, form and design. The specific concerns are detailed below.

2. SUBMISSION PURPOSE AND SCOPE

This submission outlines the City of Melbourne's position on the West Gate Tunnel Project (the Project) and its components as well as on the Environment Effects Statement (May 2017) (EES), draft Planning Scheme Amendment (May 2017) developed for the Project and the Project planning and delivery.

The City of Melbourne's submission is informed by feedback received from our community (refer Attachment A).

The City of Melbourne's submission focuses on component of the Project described as Port, CityLink and city connections (Figure 1). This has the greatest impact on the municipality of Melbourne and on the operation of the central city.

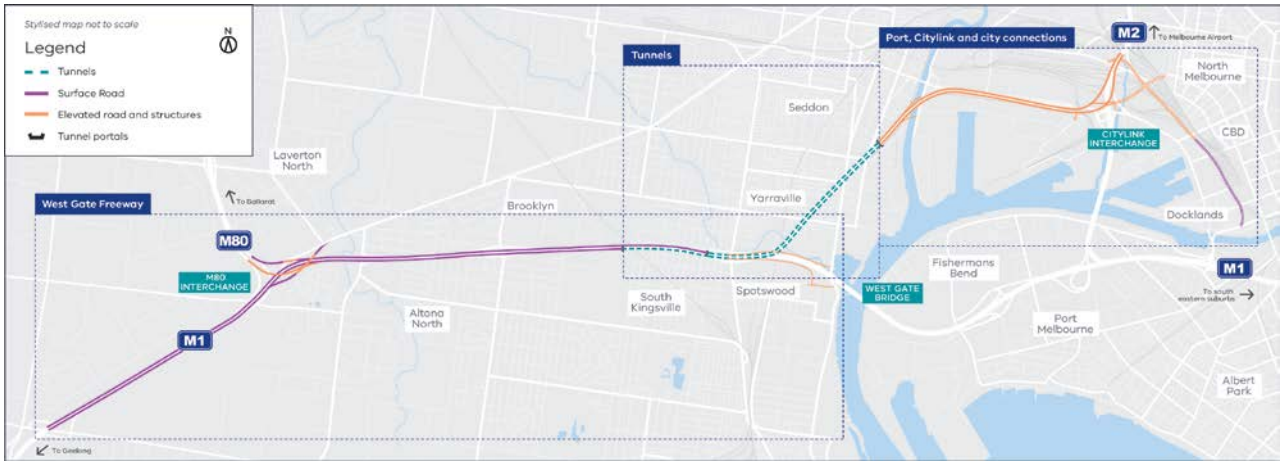

Figure 1: Project overview map **Source:** Environment Effects Statement, WDA, page ES-4

3. THE CITY OF MELBOURNE RESPONSE

3.1. The Project

The Project is at odds with a variety of visions[1] that have been agreed for Melbourne's future. The Project is an outdated and inadequate response to connecting people and goods and is inconsistent with contemporary integrated city and transport planning. Cities around the world are decommissioning or redesigning elevated roadways due to the negative impacts of the infrastructure on the surrounding land, transport network and neighbourhoods. The future liveability of the city and its economic performance is dependent on people connecting with other people for work, entertainment, shopping, services and knowledge exchange. The Project undermines this by bringing more vehicles into the city which are less space and time efficient and by using land for road infrastructure which could be used for much more productive uses.

[1]Including those visions established in Future Melbourne 2026, City of Melbourne Council Plan 2017-21, Plan Melbourne, Arden Vision and Framework, the Melbourne Municipal Strategic Statement and other endorsed City of Melbourne strategies including Transport Strategy 2012, Open Space Strategy 2012 and Nature in the City 2017.

The City of Melbourne recognises the need to provide better access to the central city from Melbourne's west, to reduce the negative impacts of truck traffic on residential areas, to improve the efficiency of freight movements and to manage congestion on the M1 and on other parts of the road network. The City of Melbourne also acknowledges the importance of the Port of Melbourne and the need for efficient and safe truck access to support the operations of the Port and its key role in the economy of the city and the state.

However, the construction of additional toll and roadway capacity providing central city access is an outdated concept and does not represent leading and sustainable integrated transport solutions. The City of Melbourne does not support a project that brings additional vehicles into the central city. This would be in direct conflict with the City of Melbourne *Transport Strategy* (2012), which includes the following targets:

- 90 per cent of all commuter trips to the CBD being by public transport walking or cycling by 2020.
- 80 per cent of all trips to the City of Melbourne by public transport, cycling or walking by 2030.

Providing direct tollway access into the local streets of the central city runs counter to many years of established policy supported by the Victorian Government and many local governments. A key outcome of the construction of CityLink in 1999 was to link freeways and remove traffic from local areas and the central city. In parallel, the City of Melbourne has invested extensively over 30 years to reduce the negative effects of traffic in local areas and to improve the performance of the road network by prioritising efficient modes including public transport, walking and cycling. The majority (between 54 and 65 per cent) of city-bound morning peak vehicles using the Footscray Road elevated section of the Project would access the central city, some 2900 to 3500 vehicles per hour. This brings unsustainable traffic volumes to the economic heart of the State and the world leading biosciences and hospital precinct. This traffic creates conflict with all north/south movements including public and active transport. The increased congestion for east/west trips has the potential to add to travel times and negate the short term and minor travel time benefits stated by the Project.

The Project has failed to identify and assess dis-benefits that are likely to be experienced by users of the public transport network affected by the congestion created by the Project. The City of Melbourne is opposed to any substantively negative impact on public transport operations across Melbourne resulting from the Project. This approach has been supported by City of Melbourne policy including successive transport strategies as well as Plan Melbourne, the 2008 "Investing in Transport - East West Link Needs Assessment" report (the Eddington Report) and Infrastructure Victoria's "30-Year Infrastructure Strategy".

Inadequacies of Project rationale

The Project's justification relies in part on the Eddington Report, which proposed a new freeway linking Melbourne's east and west. However, the Eddington Report specifically recommended against such a road having exits (or entry ramps) to the central city. It was conceived as a city bypass, not a city access road like the Project. Further the Eddington Report stated that "providing additional car access to the CBD should not be a priority for Melbourne's transport network" (pg.40).

The Project's EES and supporting information demonstrates that the East West Link would still be required even if the Project is developed as proposed. It also reveals that even after the construction of the Project, the M1 will still be congested, meaning the Project is unlikely to deliver travel time savings for users of the M1 corridor compared to today.

The Project will also have considerable negative impacts such as bringing increased congestion in areas to the north and east of the central city. According to the EES, traffic using the infrastructure of the Project will have a wide range of destinations well to the east of Hoddle Street and north of Brunswick Road, therefore bringing more traffic through these areas.

The Project has been promoted as providing a second crossing of the Maribyrnong River to create a more resilient freeway network for Melbourne. However, the Project has failed to demonstrate that the traffic network will be able to absorb diverted traffic should the West Gate Bridge be closed for any reason. The City of Melbourne is concerned that traffic diverting to the Project will cause significant congestion in the central city. Currently, incidents affecting the M1 can cause serious delays east west across the M1 corridor. However, a significant benefit of the current transport network design is that the central city is somewhat insulated from problems on the M1. The Project is likely to undermine or remove this benefit.

Expansion of the central city

Consecutive Victorian government strategic plans, including the Plan Melbourne refresh launched three months ago, have identified a corridor between the central city and Footscray as a potential expansion area for the future development of desirably-located, sustainable inner city housing and jobs. This is also reflected in the Council's Municipal Strategic Statement. The Project will undermine this strategic planning because of the impact and alignment of the infrastructure and the impact of connections provided by the Project. These areas include the Arden, E-Gate and Dynon urban renewal areas, longer term opportunities on land currently used by the Port of Melbourne, the innovation precinct immediately to the north of the Hoddle Grid, the connection of West Melbourne via E-Gate into Docklands, the integration of Melbourne Metro, with high performing on-road public transport at Arden and Parkville stations, and the creation of a world class urban environment around the biomedical precinct to attract leading researchers and build jobs. A freeway or tollway dissecting this central city environment is not supported and is inconsistent with the progressive change that is occurring across the central city.

Opportunity cost and alternative projects

The $5.5 billion Project represents a significant opportunity cost. The EES and the Business Case prepared for the Project do not demonstrate that a tollway, which incorporates connections to the central city, is the highest priority transport project to support Victoria's future prosperity, central city job growth, or support access to jobs for people in the west and the development of the knowledge economy. Improving access to and around the central city is one of the most important actions that can be taken to boost the economy of Victoria. However, the most appropriate way to improve that access is to increase the capacity of public transport supported by improvements to cycling and walking facilities and options.

For example, an alternative project that would significantly improve access to the central city as well as improve access to jobs along its alignment but without the negative impacts of increasing traffic is Melbourne Metro 2, a new rail link that could connect Werribee trains via Fishermans Bend to Southern Cross, Parkville and on via the South Morang line to Mernda. Melbourne Metro 2 is a higher value project that should be implemented and prioritised ahead of the Project. Investigating possible alignments for Melbourne Metro 2 is a recommendation of Infrastructure Victoria's 30-year Infrastructure Strategy (the Infrastructure Strategy). Investment in Melbourne Metro 2 will enhance Melbourne's liveability and the sustainability of the City, which the Project does not.

The Infrastructure Strategy addressed the question of how to meet the growing demand for access to economic activity in central Melbourne. Unfortunately, the Project was not assessed by Infrastructure Victoria and therefore not assessed in terms of relative priority as it was considered to be existing policy prior to work commencing on the Infrastructure Strategy. Notably, Infrastructure Victoria did not recommend any road projects as being high priorities for access to central Melbourne. It noted that "no major new roads have been recommended under this need as public transport will continue to be the backbone for access to central Melbourne. However, the transport network is very interrelated and road projects recommended under other needs, such as the Outer Metropolitan Ring Road, could also improve overall access to central Melbourne by relieving congestion elsewhere." (pg. 123, the Infrastructure Strategy).

The Infrastructure Strategy does recommend a wide range of transport improvements to support access to economic activity in central Melbourne. Many of these are relevant to improving transport for people living in Melbourne's west, an objective that is supported. They include Melton Rail electrification (in combination with the introduction of 10-car high-capacity metro trains), expanding the SmartBus network and providing service enhancements to the western suburbs, reforming the metropolitan bus network, expanding the capacity of the Regional Rail Link corridor in western Melbourne, transport network pricing and a range of improvements to the existing rail system such as high capacity signalling to improve the use of existing infrastructure.

Project integration

The *Transport Integration Act 2010* (Vic) ('TIA 2010') requires that Victoria has a Transport Plan. However, Victoria does not currently have a Transport Plan so the Project has been generated in the absence of the wider strategic context for transport in the state and is consequently not compliant with the TIA 2010.

Much of the planning for the Project seems to be a post-rationalisation of a proposal that is in conflict with established policy. The Project seems likely to deliver a significant gain for the private company which proposed it and which has primary responsibility to deliver profits to its shareholders, not to act in the best interests of the citizens of Victoria. While Public Private Partnership Projects may often be valuable, in this case the conflicting interests of shareholders and citizens are stark.

Integration of the Project with the rest of the transport and land-use network is poor, however, integration is a requirement of the TIA. Of particular concern is that the Project:

- Is proposed to connect tollway off-ramps into local streets, undermining liveability and economic performance.
- Will deliver some bicycle infrastructure (the “veloway”) which is extremely poorly designed and poorly integrated into the local bicycle network and surrounding land.
- Provides no specific public transport improvements and appears likely to undermine central city public transport operation, especially north/south operations.
- Will devalue land by undermining the potential uses of land through which it passes.
- Will result in excess road space on Footscray Road but proposes no amelioration of this.

Suggests that possible traffic volume reductions on Spencer Street due to the Project are a benefit to the community but proposes no approach to locking these in.

Port of Melbourne

It is not clear that the current design of the Project is the optimal way to serve the Port in its current location and to prepare for the possible development of a new Port out of the central city in approximately 2055 as identified in Infrastructure Victoria’s Advice on securing Victoria’s Port Capacity (2017). The EES does not provide enough information about the assumptions made in relation to the Port. The design provides for two entrances to the Port to serve two different stevedores. This is at least partly because of the planned closure of Coode Road, which links the east and west ends of the Port. The reasons for the closure are not explained. The outcome is that a significant amount of land outside the Port has been used for Port access including land on the Maribyrnong River frontage. The EES and supporting documentation does not adequately demonstrate how changes to the Port have been considered; this includes the growing importance of Webb Dock for moving containers because it will be more difficult for larger ships to access Swanson Dock.

EES objectives

The City of Melbourne considers that the Project fails to deliver the objectives identified in the EES. There are other projects or initiatives that have potential to achieve these objectives and make better use of existing infrastructure. One of the objectives of the Project is to address the mismatch between transport and land use especially regarding access from Melbourne’s west to central city jobs. The Project does nothing to bring jobs closer to residents of Melbourne’s west but will instead further embed sprawl and expensive car dependency.

The Project is trying to address amenity problems in Melbourne’s inner west. The proposed solution is leading to amenity problems in other areas of Melbourne, including to the north of the Hoddle Grid. The EES fails to adequately consider this.

Traffic modelling

The City of Melbourne is concerned that the travel time savings described in the EES overstate the benefits, do not represent the majority of trips and represent limited benefit for the majority of users. The modelling does not assess the full impact of increased congestion caused by the Project. This is

compounded by a failure of the Project to adequately assess induced demand. The City of Melbourne is concerned that the '2031 no project scenario' overstates the background growth in traffic and the EES understates the whole of life effect of the Project. There are also significant traffic impacts which are not modelled including for people travelling north/south and users of the Eastern Freeway.

The City of Melbourne considers that the severe negative consequences of specific project features will outweigh any possible benefits or travel time savings due to the Project.

West Melbourne Structure Plan

The City of Melbourne has been working collaboratively with the community in the preparation of the West Melbourne Structure Plan. The structure plan prioritises the public realm within West Melbourne and will ensure the sustainable growth of this neighbourhood. The Project should not be permitted to undermine the structure plan or compromise the ability to achieve its vision.

The City of Melbourne position in response to the current design

The City of Melbourne opposes several aspects of the current design of the Project, including:

- The connection to Dynon Road.
- The extension and widening of Wurundjeri Way.
- The elevated tollway structure along Footscray Road in combination with the retention of existing at-grade traffic lanes.
- The design and siting of the Maribyrnong River crossing and MacKenzie Road connections.
- The design of the veloway.

The City of Melbourne also has a number of concerns about the design and performance of the shared paths, including the proposed veloway, as well as concerns about the connections to Appleton Dock Road, Footscray Road and CityLink.

The City of Melbourne's more detailed submissions in relation to specific aspects of the Project in the Port, CityLink and city connections component are set out below at section 4.

3.2. Environment Effects Statement

The City of Melbourne does not consider the Project meets the objectives and needs identified within the Western Distributor Business Case (December 2015) and the EES.

The City of Melbourne's view is that the EES fails to identify or adequately address impacts of the Project. The EES does not meet the Project's EES Scoping Requirements (April 2016) or the evaluation objectives established within the Scoping Requirements (see Attachment B).

For the reasons set out in Attachment B, City of Melbourne submits that the EES fails to appropriately assess the impact of the Project on:

- Transport capacity, connectivity and traffic management
- Built environment
- Health, amenity and environmental quality
- Social, business, land use, public safety and infrastructure
- Landscape, visual and recreational values
- Hydrology and water quality
- Biodiversity
- Environmental Management Framework.

3.3. Draft Planning Scheme Amendment

The City of Melbourne has significant concerns about the contents of the Incorporated Document that is proposed to be part of the Melbourne Planning Scheme. The amendment proposes to exempt the Project from other planning considerations. Given this, the draft amendment does not provide enough certainty and detail about the proposal. It does not provide for the inclusion of the Environmental Performance Requirements (EPRs) or a transparent structure for the governance of the Project, including changes which could be made to the EPRs and detailed project plans.

The Planning Scheme Amendment must be re-written to require greater consultation with Councils and other affected stakeholders.

3.4. Project planning and delivery

The City of Melbourne seeks to ensure that the planning and governance structure for the Project as identified in the Environment Management Strategy and the Planning Scheme Amendment requires the involvement of the City of Melbourne and other relevant agencies. Should the Project proceed despite the concerns laid out in this submission, the City of Melbourne must be involved in the detailed design and planning of the Project and technical working groups which will guide the delivery of the Project. This is to ensure the Project integrates with the municipality.

A good example of these arrangements working well is the Melbourne Metro Rail Authority which has a well developed engagement and well executed approach.

4. SUBMISSIONS IN RELATION TO PARTICULAR ASPECTS OF THE PROJECT

4.1. Introduction

The City of Melbourne considers the Project will have an unacceptable impact on a range of issues which have not been adequately assessed and/or mitigated in the EES.

The City of Melbourne is concerned that the assessment of the Project fails to take into account established policy for the renewal and improvement of land and waterways in the Project area. The impact assessment also fails to adequately assess impacts against adopted policy. Instead the impact assessment frequently assesses impacts against current conditions. The City of Melbourne submits that the EES base case should be a future condition identified based on adopted policy. It is therefore submitted that the impacts of the Project are currently under assessed and the proposed mitigations are not adequate.

The following sections provide the City of Melbourne's position for each section within the Port, CityLink and city connections component of the Project and the key issues as determined by the City of Melbourne.

An overview of the key issues for the Port, CityLink and city connections component of the Project can be found at Attachment C.

4.2. Dynon Road connection

Position

The City of Melbourne opposes the Project's connection to Dynon Road. The Dynon Road connection has limited strategic rationale, particularly in relation to the Project's objectives. It will introduce significant amounts of traffic onto local streets in North Melbourne and beyond, which will undermine the operation of key economic precincts such as the biomedical precinct and the innovation district as well as existing public transport. This section of the Project is in conflict with City of Melbourne policy and undermines decades of work to reduce through traffic in this precinct. The City of Melbourne does not consider that the impacts of this connection can be managed or mitigated; and therefore submits that the connection should not be constructed as part of the Project.

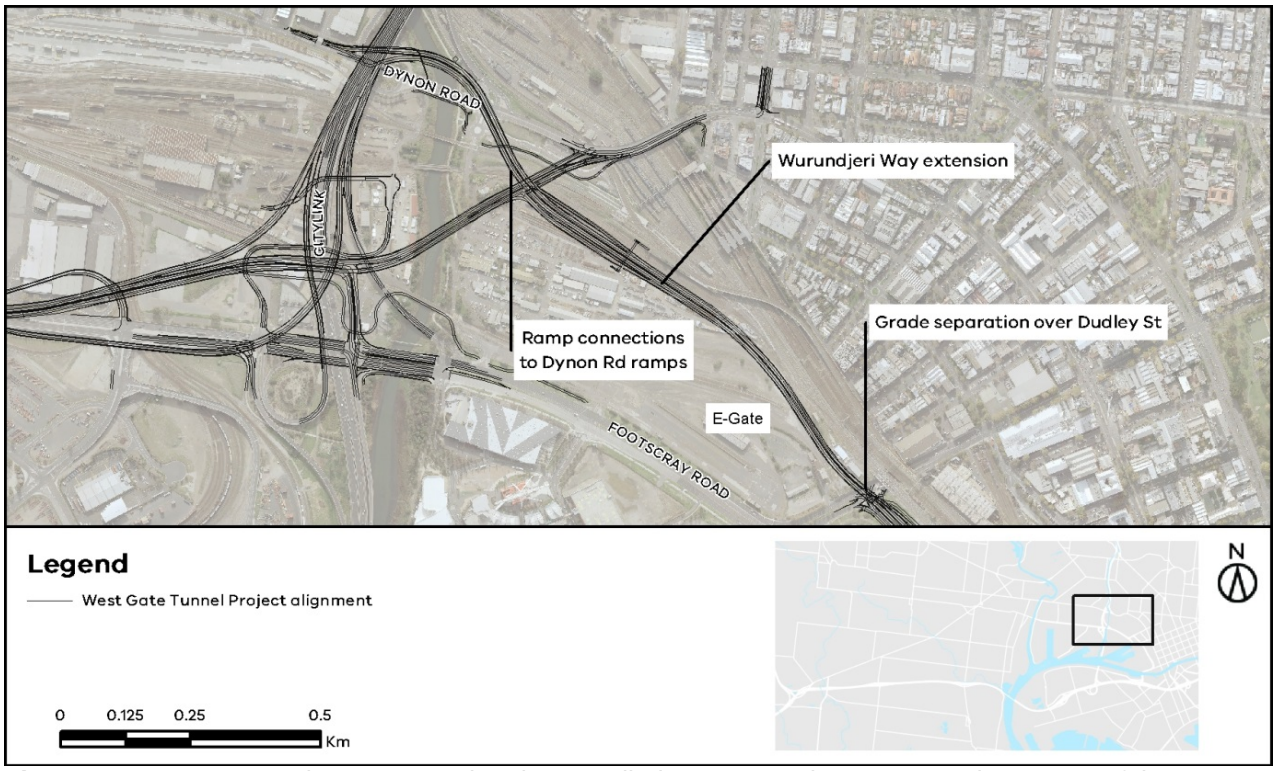

Figure 2: Footscray Road, Dynon Road and Wurundjeri Way extension **Source:** Figure 5-12 of the EES.

Impacts

This connection runs as an elevated roadway ramp directly through E-Gate and into the local road network. Analysis undertaken by City of Melbourne shows that this will cause peak hour congestion on local streets in North Melbourne for 12-14 hours a day. This congestion and extra traffic is likely to significantly affect public transport operations within the inner north including possible delays to current trams operation as well as undermining opportunities to further improve the performance of trams and other on-road public transport for the life of the Project. The Project has the potential to negatively impact all transport accessing the central city from the north and west, this includes 13 tram routes, carrying approximately 13,000 people per hour. This causes significant travel time delay. Public transport patronage is growing strongly and improvements to increase its share of travel in the central city area are strongly supported by City of Melbourne and State Government policy. The EES fails to identify the impacts that may be experienced by users of the public transport network, particularly north/south tram services in North Melbourne. North/south tram movements must not be impacted by the projected increase in future east/west traffic demands. By 2031, the City of Melbourne expects that every measure which increases priority to north/south tram movements will already be implemented and therefore there will be no opportunity to mitigate the impact of extra traffic, using measures such as changes to signal timing.

The area into which the traffic will flow also has significant bus operations which are likely to be affected. Buses generally do not run in their own right of way and many of the existing buses run east west through this area.

The EES has not undertaken adequate traffic modelling further than one intersection beyond the constructed Project infrastructure; therefore the EES fails to assess the impact of where traffic from the Project will go.

The section of Moonee Ponds Creek that the Dynon Road connection is proposed to pass over is currently unencumbered, has ecological value and significant potential as open space and habitat. The value of the creek corridor connecting Arden and Docklands will be compromised as a direct result of the Dynon Road connection. This is a vital open space resource for these urban renewal areas and existing neighbourhoods and the Project impacts are inadequately assessed in the EES. E-Gate's frontage to Moonee Ponds Creek will be severely compromised as will the amenity and value of this open space. This will undermine access from E-Gate to adjoining neighbourhoods along the creek corridor. Open space and vegetation offsets are not considered to mitigate the impact or loss of existing and future opportunities for the renewal of Moonee Ponds Creek or E-Gate that result from the Dynon Road connection. The connection fails to ensure that all works within the waterway will enhance the amenity, habitat and natural values of the creek environment.

The design also requires that the Wurundjeri Way link be above the elevated Dynon connection. This results in excessive height with impacts on both established areas and renewal areas.

The EES fails to adequately assess or consider all impacts of the Project caused by the Dynon Road connection. It also does not propose acceptable mitigation strategies for all impacts. The key impacts which the EES fails to address appropriately include:

North and West Melbourne business	1. The impact of increased traffic and congestion in local streets on the amenity of businesses has not been assessed. 2. The economic impact of reduced amenity for businesses has not been assessed. 3. The impact of local road congestion on supply chain logistics within the precincts has not been assessed. 4. The impact on business and property values has not been assessed.
North and West Melbourne communities	5. The impact of increased traffic and congestion in local streets has not been assessed. 6. The impact on the amenity of the community has not been assessed. 7. The impact of increased noise and reduced air quality during construction and operation on public places valued by the community has not been adequately assessed. 8. The impact of traffic diversions, restricted access and congestion during construction on the community has not been adequately assessed or therefore mitigated. 9. The impacts on connectivity between North and West Melbourne and existing and future neighbourhoods and community have not been adequately assessed. 10. The impact on property and land values in this community as a result of the Project has not been assessed.

Arden Macaulay urban renewal area	11. The impacts of increased noise and reduced air quality in the Arden Macaulay urban renewal area as a result of construction and operation of the Project have not been assessed. 12. The impact on connectivity between Arden Macaulay and surrounding areas has not been adequately assessed. 13. The impact on access to Arden and Macaulay has not been adequately assessed, including impact on the new Metro station area and surrounding employment centre.
Moonee Ponds Creek	14. The impacts on Moonee Ponds Creek and surrounds due to piers in the waterway have not been adequately assessed. 15. The EES does not adequately demonstrate how impacts of climate change and urban renewal in the vicinity are considered. 16. The impact of the Project on the open space, recreation and biological functions of Moonee Ponds Creek (current and planned conditions) has not been adequately assessed or mitigated.
Moonee Ponds Creek Trail	17. The impacts on the Moonee Ponds Creek Trail amenity (noise, overshadowing, visual impact, air quality and other issues) and experiential quality (current and planned) as a result of the Project have not been adequately assessed. 18. The impacts on the accessibility of the existing Moonee Ponds Creek Trail have not been adequately assessed. 19. The impacts on personal safety of users of the Moonee Ponds Creek Trail have not been adequately assessed.
Surface Water	20. The impact on surface water as a result of upstream flood levels in the Arden Macaulay precinct has not been adequately assessed.
E-Gate urban renewal area	21. The impact of an elevated roadway through the E-Gate site on the ability to integrate the site with surrounding neighbourhoods in the future has not been adequately assessed. 22. The impact of an elevated roadway through the E-Gate site on land value and future development opportunities has not been assessed. 23. The impact of an elevated roadway through the E-Gate site on the amenity (including air quality, noise, visual and social) of a future mixed-use community (as established in Plan Melbourne) has not been adequately assessed.
Open Space (new and existing)	24. The impacts on open space (new and existing), including to amenity, aesthetic qualities of the open space, recreational and ecological functions, as a result of increased traffic and the introduction of an elevated roadway have not been adequately assessed.
Biodiversity and urban ecology	25. The impacts on biodiversity and ecology as a result of the introduction of an elevated roadway on the ability of the land nearby to perform its biological functions (such as providing for habitat, flora and fauna) have not been

	adequately assessed. 26. The impacts on the ability to improve the ecological condition of the Moonee Ponds Creek corridor as a result of the infrastructure have not been assessed.
Landscape and visual impact	27. Landscape and visual impacts of the infrastructure from Moonee Ponds Creek and Footscray Road have not been adequately assessed or mitigated.
Noise and vibration impact	28. Noise and vibration impacts on amenity as a result of the construction and operation of the roadway in areas adjacent including in the Dynon Urban Renewal Area, E-Gate Urban Renewal Area, North and West Melbourne and the Moonee Ponds Creek have not been adequately assessed or mitigated.

The City of Melbourne does not consider that the impacts associated with this section of the Project can be appropriately managed and therefore City of Melbourne submits that the Dynon Road connection must not be delivered as part of the Project.

4.3. Extension and widening of Wurundjeri Way

Position

The City of Melbourne does not support the design of the Wurundjeri Way extension due to the impact of the infrastructure on the E-Gate urban renewal area, Moonee Ponds Creek, the West Melbourne community and the loss of the opportunity to make connections between E-Gate, Docklands and West Melbourne.

Impacts

The Project fails to appropriately consider the impacts of increased traffic along the widened section of Wurundjeri Way or model how traffic outflow at the southern end of Wurundjeri Way would occur. A long term plan for the Flinders Street intersection is not provided.

The EES fails to adequately assess or consider all impacts of the Project caused by the Wurundjeri Way extension. It also does not propose acceptable mitigation strategies for all impacts. The key impacts which the EES fails to address appropriately include:

Moonee Ponds Creek and surrounds	1. The impacts on Moonee Ponds Creek and surrounds due to piers in the waterway have not been adequately assessed. 2. The impact of the Project on the open space, recreation and biological functions of Moonee Ponds Creek (current and planned conditions) has not been adequately assessed or mitigated.
Biodiversity and urban ecology	3. The impacts on biodiversity and ecology as a result of the introduction of an elevated roadway on the ability of the land nearby to perform its biological functions (such as providing for habitat, flora and fauna) have not been adequately assessed. 4. The impacts on the ability to improve the ecological condition of the Moonee

	Ponds Creek corridor as a result of the infrastructure have not been assessed.
Urban forest	5. The impacts on the urban forest, including its amenity, landscape and ecology, as a result of the loss of approximately 125 trees has not been adequately assessed or mitigated.
Heritage	6. The impacts on heritage as a result of the position and proximity of the infrastructure to important heritage sites and structures including the Dynon Road Bridge and the Moonee Ponds Creek have not been adequately assessed or mitigated.
E-Gate urban renewal area	7. The impact of an elevated roadway through the E-Gate site on the ability to integrate the site with surrounding neighbourhoods in the future has not been assessed. 8. The impact of an elevated roadway through the E-Gate site on land value and future development opportunities has not been assessed. 9. The impact of an elevated roadway through the E-Gate site on amenity (including air quality, noise, visual and social) of a future mixed-use community (as established in Plan Melbourne) has not been assessed.
Future connections between West Melbourne and Docklands	10. The impacts on future connections (pedestrian, cycling, vehicular) between West Melbourne and Docklands as a result of the introduction of elevated roadway through the E-Gate site have not been adequately assessed.
Noise and vibration	11. Noise and vibration impacts on amenity as a result of the construction and operation of the roadway in areas adjacent including in the Dynon Urban Renewal Area, E-Gate Urban Renewal Area, North and West Melbourne and the Moonee Ponds Creek have not been adequately assessed or mitigated.
Landscape and visual impact	12. Landscape and visual impact from West Melbourne towards Docklands as a result of the elevated roadway being introduced to an area identified as containing sensitive uses in the future has not been adequately assessed or mitigated. 13. The Landscape and Visual Impact Assessment does not adequately assess the impact of the Project on existing sensitive receptors (residents and open space) in West Melbourne.
Dudley Street pedestrian underpass	14. The impact on the pedestrian underpass at Dudley Street, including on issues of pedestrian safety, amenity, accessibility and experiential quality, as a result of the introduction of roadway structures and widening of the Dudley Street/Wurundjeri Way intersection has not been adequately assessed. 15. The issue of flooding at Dudley Street has not been assessed.

Alternative design

If the extension to Wurundjeri Way is to be delivered as part of the Project, the extension must be redesigned to facilitate improved outcomes for existing and future communities including West Melbourne, Arden, E-Gate and Dynon and to mitigate the impacts of the Project. This includes the opportunity to lower the height of the extension and possibly bring it to ground level.

If this section of the Project goes ahead, projected reductions in traffic entering the Hoddle Grid via Spencer Street and King Street must not be lost to induced traffic. Changes to central city road space, including benefits to pedestrians, cyclists and public transport operation, must be implemented as part of the Project to realise the benefits of these reductions in traffic and help to minimise the impact of the Project. Amendments must be made to the City Link Concession Deed to enable these works to be delivered.

Improvements to pedestrian connections between West Melbourne and Docklands – including at Dudley Street – should also be required. Designs need to be prepared which show how these connections can work.

Waterways must be rehabilitated in line with City of Melbourne policy and objectives.

4.4. Maribyrnong River crossing and connections to MacKenzie Road

Position

The City of Melbourne does not support the elevated Maribyrnong River crossing and connections to MacKenzie Road (refer Figure 3).

Figure 3: View of the design of the Maribyrnong River crossing, looking south **Source:** EES Summary Report

The scale of infrastructure being introduced at the Maribyrnong River crossing and the impact on the urban environment is significant and appears to be disproportionate to the level of access actually

required to the Port of Melbourne and the broader Dynon precinct. These impacts need to be considered in line with Infrastructure Victoria's analysis that Webb Dock will experience growth ahead of Swanson Dock and the possible development of a new port out of the central city in around 2055.

Impacts

The EES fails to adequately assess or consider all impacts of the Project caused by the Maribyrnong River crossing and connections to MacKenzie Road. It also does not propose acceptable mitigation strategies for all impacts. The key impacts which the EES fails to address appropriately include:

Traffic	1. An assessment of traffic and its impacts in the Kensington area and surrounds as a result of the Project, including the new MacKenzie Road connections has not been undertaken and must be done. 2. The impact on travel demand patterns of trucks accessing the Dynon and surrounding precincts have not been adequately assessed.
Design of the Maribyrnong River crossing	3. The impact of the Maribyrnong River crossing on the quality of the gateway entrance experience into the City of Melbourne has not been assessed. 4. The impact of the Maribyrnong River crossing on the amenity of the riverfront and surrounds (current and planned conditions) has not been assessed.
Landscape and visual impact	5. Landscape and visual impact to the Maribyrnong River and surrounds as a result of the introduction of elevated road structures across the river have not been fully assessed. 6. The relationship between the architectural concept and visual impact has not been assessed. 7. Mitigation strategies proposed for acknowledged impacts are not considered adequate.
Urban ecology and biodiversity	8. The impacts to urban ecology and biodiversity of the river corridor (including the movement of wildlife and protection of listed species) as a result of the Maribyrnong River crossing and MacKenzie Road connections have not been adequately assessed. 9. The impacts on the ability to rehabilitate the river corridor - in line with City of Melbourne policy - as a result of the Project have not been assessed.
Heritage	10. The impacts on heritage places, particularly within and on the western bank of the Maribyrnong River (including shipwrecks), as a result of the current design for the Project and placement and proximity of the infrastructure to these heritage sites has not been adequately assessed or mitigated.
Land use	11. The impacts of the Maribyrnong River crossing and connections to MacKenzie Road on land use and urban renewal of the broader precinct, including areas south of Dynon Road and the area currently occupied by the Port of Melbourne, have not been adequately assessed.

	12. The expected changes to land use in the precinct, including Dynon, have not been adequately assessed.
Open space	13. The impact on open space, including the eastern bank of the River, which is identified in City of Melbourne policy as a key environmental and recreational open space corridor, as a result of the Maribyrnong River crossings and MacKenzie Road connections has not been adequately assessed.
Surface Water	14. The impact on the quality of stormwater entering the waterways as a result of construction and road development has not been adequately assessed. 15. An impact assessment must be prepared for any measures proposed to mitigate the impact of flooding, including the bank widening works identified for the Maribyrnong River.

Alternative design

Should the Project proceed with a crossing of the Maribyrnong River, it should be redesigned to eliminate bridges. The main carriageway should extend as a tunnel under the Maribyrnong River and Footscray Road.

If elevated structures are to remain, the MacKenzie Road access ramps must be redesigned to minimise the impact on the Maribyrnong River environs and future and existing public land. Ideally, given this connection is predominately serving the Port of Melbourne, alignment within Port of Melbourne land must be more robustly investigated.

4.5. Footscray Road Elevated Structure

Position

The City of Melbourne is opposed to the elevated structure along Footscray Road.

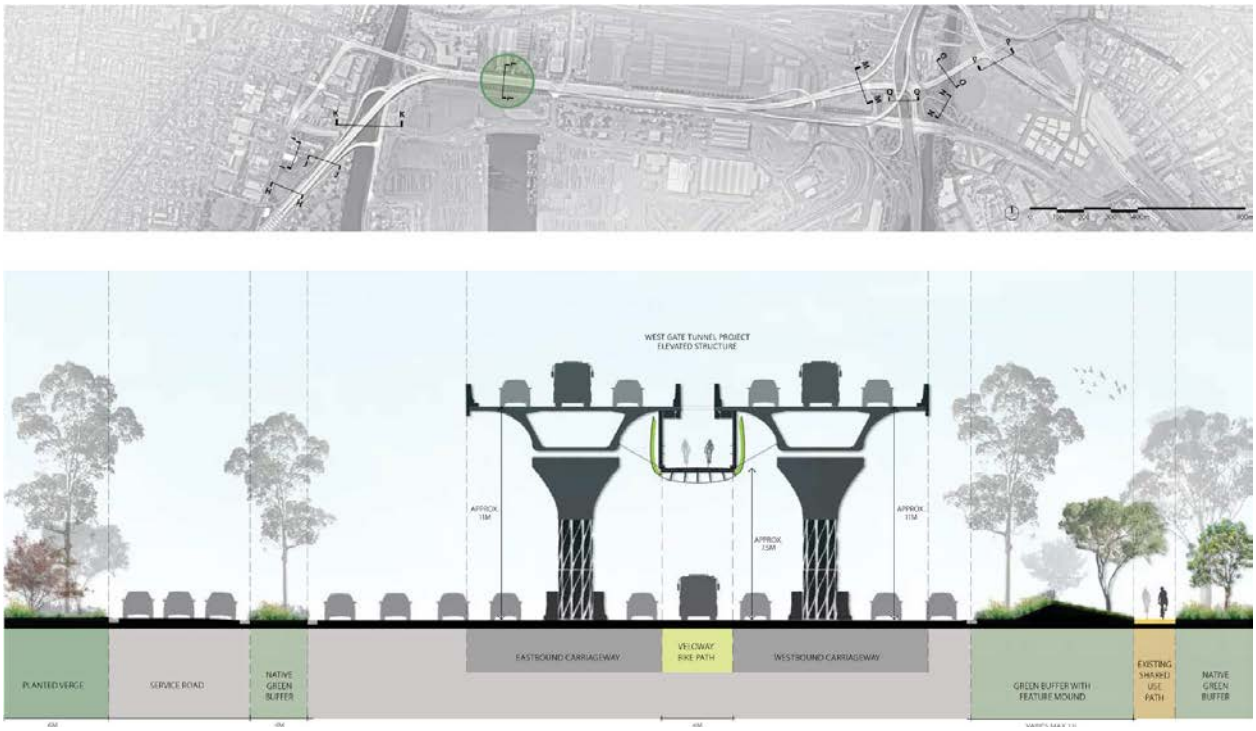

Figure 4: Cross section of the Footscray Road Elevated Structure **Source:** EES Map Book

Impacts

The EES fails to adequately assess or consider all impacts of the Project caused by the Footscray Road elevated structure. It also does not propose acceptable mitigation strategies for all impacts. The key impacts which the EES fails to address appropriately include:

Footscray Road Tunnel	1. Failure of the Business Case and EES to test the option of a Footscray Road tunnel or other viable alternatives and assess the impact, including on urban renewal and land value of an alternative solution versus the current solution (elevated structure on Footscray Road).
Traffic and Transport	2. Strategic justification for 18 lanes of traffic on/above Footscray Road has not been provided and the impacts have not been assessed. 3. Lost opportunities for the precinct - including landscaping, improvements to public transport along the corridor and environmental outcomes, as a result of delivering 18 lanes of roadway including an elevated structure have not been assessed.
Footscray Road Design	4. The impacts on the urban environment as a result of the design of the Footscray Road elevated corridor and structures have not been adequately assessed. 5. Alternative, innovative designs and construction techniques have not been adequately considered.
Land Use and Built	6. The impacts on land use and future built form, including on developability of the land and limitations on the type and use of built form on land adjacent to the

form	elevated Footscray Road structure, have not been adequately assessed.
Landscape and Visual Impact	7. Landscape and visual impact of the elevated roadway structure on Footscray Road and surrounds has not been adequately assessed. 8. The impact on the realisation of Footscray Road as a boulevard, as identified in the Melbourne Planning Scheme, has not been adequately assessed. 9. Mitigation strategies proposed for acknowledged landscape and visual impacts as a result of the Footscray Road elevated structure are not adequate.
Urban Forest	10. The impacts on the urban forest, including its amenity, landscape and ecology, as a result of the loss of approximately 537 trees along the Footscray Road corridor have not been adequately assessed or mitigated. 11. The impact of the Project on growing conditions along Footscray Road has not been adequately assessed.
Open Space	12. The impacts on open space, including the value, quality and amenity of existing and new areas of open space to be introduced in the precinct, as a result of the Footscray Road elevated roadway have not been adequately assessed.
Business	13. The economic impacts on businesses in Docklands, North and West Melbourne as a result of diverted traffic, heavy vehicle movements, noise and amenity issues during construction of the Footscray Road elevated roadway have not been adequately assessed.

Alternative design

The City of Melbourne considers that, should the Project proceed, the Footscray Road section of the Project should be redesigned as a continuation of the tunnel connecting to CityLink.

Failing this, the City of Melbourne considers that the Footscray Road section should be redesigned with an associated rationalisation of the existing road conditions along Footscray Road. This would have a reduced negative impact on urban renewal and built form outcomes along this corridor as well as future permeability. It would also provide enhanced opportunities for open space and landscaping and the provision of public and active transport.

If the Project is to proceed as an elevated structure, the elevated structure should be redesigned to mitigate the impacts of the design. This includes improving the ability for ground level amenity and functionality – the current height of the structure doesn't provide for this to occur, the rationalisation of traffic lanes at surface and the relocation and redesign of the veloway (see further discussion at section 4.6).

4.6. Footscray Road at surface

Position

The EES does not assess the impact of the Project on the existing Footscray Road.

Figure 5: Footscray Road at ground level **Source:** EES Summary Report

Impacts

The EES fails to adequately assess or consider all impacts of the Project on the existing Footscray Road (surface). It also does not propose acceptable mitigation strategies for all impacts. The key impacts which the EES fails to address appropriately include:

Traffic	1. Failure to adequately assess and consider current or future traffic demand on Footscray Road at surface.
Public Transport	2. Failure to demonstrate that the Project achieves any improvements to public transport services along Footscray Road.
Design of Footscray Road at surface	3. The impacts of a diminished quality of experience of Footscray Road at ground level as a result of the design have not been fully assessed.

Alternative design

The City of Melbourne does not support the retention of all existing lanes along Footscray Road as general traffic lanes as currently proposed by the Project. The Project needs to address the impacts it causes by realising opportunities within the Footscray Road corridor to increase planting, water sensitive urban design and other environmental outcomes, as well as public and active transport connectivity.

4.7. Veloway and shared paths

Position

The current design of the veloway along the Footscray Road section of the Project is a poor design which does not present the best or safest outcome for the community.

The City of Melbourne is concerned about the current alignment of the shared path (from the veloway) over the Moonee Ponds Creek and submits that this should be realigned to position the connection closer to existing infrastructure. Under the current design, the Project meets the existing Footscray Road shared path in the vicinity of the new Docklands Primary School. This creates potential conflicts for users of the path, pedestrians and school children and general congestion along this path. The Project should provide alternative crossings of Footscray Road and additional and improved shared paths and connections along Footscray Road to mitigate these impacts.

Figure 6: Artist impression of the inside of the veloway **Source:** EES Summary Report

The City of Melbourne supports improvements to the existing shared path along Footscray Road. Infrastructure is required to be delivered as part of the Project to ensure the existing at-grade shared path along Footscray Road services growth in trips. Priority access for users of this path should be maintained throughout the construction and operation of the Project.

A separated shared path and improvements to the Moonee Ponds Creek Trail is supported.

The City of Melbourne supports improvements to the shared path network at Dynon Road but submits that this element of the Project needs to be integrated with the existing network and be future proofed to ensure it can accommodate additional capacity, this includes providing a crossing at Lloyd Street.

Impacts

The EES fails to adequately assess or consider all impacts of the Project caused by the veloway and shared path connections of the Project. It also does not propose acceptable mitigation strategies for all impacts. The key impacts which the EES fails to address appropriately include:

Design of the Veloway along Footscray Road	1. Risks associated with personal safety of users of the veloway as a result of a deficient design, which lacks passive surveillance and limited exit points, have not been assessed. 2. Quality of the user experience of the veloway, as a result of design issues including lack of access to natural light, lack of ventilation and lack of visual permeability, has not been considered. 3. Failure to demonstrate consideration of the severe curvature and limited visibility for cyclists in both directions along the veloway over the Footscray Road on- and off-ramps.
Capacity	4. Failure to design shared paths (including veloway, connection to Footscray Road and Dynon Road) with capacity to safely accommodate future growth.
Amenity	5. Impacts on amenity, including the quality of the pedestrian and cyclist experience on the Footscray Road shared path at surface, as a result of the introduction of elevated roadway structures have not been adequately considered.
Moonee Ponds Creek	6. Impacts on the Moonee Ponds Creek, created by the inclusion of a separate crossing of the Creek to accommodate the veloway rather than rationalising infrastructure, have not been adequately considered. 7. The impact of the Project infrastructure on the desired connectivity along the Moonee Ponds Creek corridor has not been adequately assessed.
E-Gate	8. Impacts to E-Gate including future access to the site as a result of the veloway connection are inconclusive in the EES.
Veloway exit on Footscray Road	9. Impact of the veloway users entering and exiting the structure in close proximity to the entry to the recently announced Docklands Primary School has not been assessed. 10. Impacts on land adjoining the veloway connection are inconclusive in the EES.
Railway and Miller Street Reserve	11. Inadequate detail of a shared path through Railway and Miller Street Reserve and its impact on a sloping, grassed and planted part of the reserve is included in the EES.

Alternative design

In line with City of Melbourne's submissions on Footscray Road, the shared path should be provided at ground level rather than as an elevated veloway. Failing this, the veloway should be repositioned to the north side of the modified elevated structure, with the structure redesigned to ensure it is open to the air and allows for views out and future passive surveillance. Greater connectivity to the veloway also needs to be provided. The existing design of the veloway may be too narrow to safely accommodate existing and future use. The City of Melbourne's initial view is that the veloway should be a minimum of 6 metres wide.

The City of Melbourne submits that the shared path crossing of Footscray Road should be moved further to the east to align with the future connection to Hawke Street in West Melbourne. The shared path should then ramp down to both the northern and southern sides of Footscray Road eliminating the potential for conflict at the school frontage and addressing existing safety concerns along Harbour Esplanade. The extension of the shared path along the northern side of Footscray Road to connect into Dudley and La Trobe streets will further ease this conflict.

The Project must reconsider the width of the Dynon Road Shared Path, currently planned to be 3 metres wide and other new or upgraded bike/shared paths to ensure these pathways are capable of safely accommodating existing and future volumes. It is also noted that the City of Melbourne recently widened the shared path on the north side of Dynon Road, west of Lloyd Street, to 3.5 metres. Given that bike and pedestrian volumes will significantly increase when a connection to the city is provided adjacent to the existing rail overpass, it is recommended that a 4 metre wide minimum pathway be provided along Dynon Road.

The City of Melbourne submits that the impact of the Project's construction or operation cannot impede the function of existing shared path facilities. The Project should also identify early works to support a growth in active transport trips throughout the construction of the Project and address safety concerns.

4.8. Connection to Appleton Dock Road

Position

This connection should provide access to both east and west Swanson Dock. The alignment of this connection should be reconfigured to minimise its footprint.

Impacts

The EES fails to adequately assess or consider all impacts of the Project caused by the connection to Appleton Dock Road. It also does not propose acceptable mitigation strategies for all impacts. The key impacts which the EES fails to address appropriately include:

Footscray Road shared path	1. Impact on users of the Footscray Road shared path as a result of the construction and operation of the west bound Appleton Dock Road exit has not been considered. Diversions to the shared path are not supported.
Appleton Dock	2. Impacts as a result of the design and alignment of the Appleton Dock Road exit, on future adjacent land use, on the urban forest and renewal of land directly north of

Exit design	Footscray Road, have not been adequately assessed.

4.9. CityLink connection

Position

The City of Melbourne is concerned about the height and visual dominance of the CityLink connection.

Figure 7: CityLink Connection looking south **Source:** EES Summary Report

Alternative design

City of Melbourne is also of the view that an alternative alignment should be investigated to reduce the footprint of this connection; this will be enabled by the removal of the Dynon Road connection. The rationalisation of the design will reduce the impact on heritage and the Dynon renewal precinct.

4.10. Footscray Road ramps

Position

Widening of existing Footscray Road bridge over the Moonee Ponds Creek is preferable to an additional crossing of the creek. The City of Melbourne is concerned that new open space will function poorly and is not an appropriate off-set for open space and ecology impacts.

Impacts

The EES fails to adequately assess or consider all impacts of the Project caused by the Footscray Road Ramps. It also does not propose acceptable mitigation strategies for all impacts. The key impacts which the EES fails to address appropriately include:

Open space	1. The provision of 1.4 hectares of open space on the western bank of Moonee Ponds Creek is not considered an appropriate mitigation for the ecological impact or loss of existing or future opportunities that result from the Project. 2. The delivery of this open space should be a commitment as part of the Project, not subject to future negotiations. 3. Issues relating to land ownership, land management, accessibility, safety, amenity and open space needs in this location need further assessment.
Landscape and visual impact	4. The landscape and visual impact assessment provides little recognition of the value of Moonee Ponds Creek. The assessment and residual impacts are not accepted.

5. RECOMMENDATIONS

The City of Melbourne requests that the Inquiry and Advisory Committee require the Western Distributor Authority to take into account the matters raised in this submission and recommend to the Minister for Planning that the Project be changed in accordance with this submission.

Achieving an integrated outcome that makes a positive contribution to the urban environment and does not destroy the future is of fundamental importance to the City of Melbourne. The City of Melbourne acknowledges that there is a need to improve access from Melbourne's west to central city. However the rationale for providing this access by bringing more motor vehicles to the busy and fast intensifying central city has not been not been established and the impact of doing so outweighs any perceived advantages.

The timeframes provided by this process are very limited and the City of Melbourne has attempted to provide a fulsome submission in the limited time available. The City of Melbourne may seek to raise further matters in due course upon further consideration of the EES and Planning Scheme Amendment.

ATTACHMENT A - COMMUNITY ENGAGEMENT

City of Melbourne Consultation

The City of Melbourne undertook a program of community engagement on the West Gate Tunnel Project between the 29 May 2017 and 22 June 2017. The purpose of this was to hear the views of our community on the Project, to assist the community to understand the Project impacts within the City of Melbourne and to assist the community to participate in the Environmental Effects Statement process.

The consultation consisted of a webpage, survey and an independently facilitated community consultation session.

Participate Melbourne webpage

The webpage was hosted on the City of Melbourne's community engagement website – Participate Melbourne. An online survey was also accessible from this site. This site also linked through to further information on the Project hosted by the Western Distributor Authority and the Department of Environment, Land, Water and Planning.

Survey results

A survey was available on Participate Melbourne from 29 May 2017 to 22 June 2017. The survey asked participants whether or not they supported the Project, what their key issues were, and for comment on any other matters.

The City of Melbourne received 51 survey responses, 40 of these were residents of the City of Melbourne. Of the respondents, 34 did not support the Project, three supported the Project and 14 supported the Project if change were made.

The top three issues by ranking were; 'traffic in local areas', 'physical connections to other areas' and 'noise and amenity' impacts.

Of the survey respondents, 23 participants reported that they were not aware of the community consultation process run by the Western Distributor Authority/Transurban and a further six were aware of the process but did not participate. The results of the survey are included within Appendix A.1.

Community engagement evening

An independently facilitated community information session was held at the Melbourne Town Hall on Thursday 8 June 2017. A presentation on the Project was given by the City of Melbourne. The presentation highlighted some preliminary impacts of the Project and was followed by a comment, question and answer session. City of Melbourne officers were on hand for the duration of the event to answer any questions attendees had and capture any views on the Project. The survey was made available to attendees in paper and electronic form at the end of the session. A report summarising this event is attached as Appendix A.2.

ATTACHMENT B - CITY OF MELBOURNE RESPONSE TO EES SCOPING REQUIREMENTS OBJECTIVES

The *Western Distributor Project – EES Scoping Requirements* were released by the Minister for Planning in in April 2016.

The City of Melbourne's response to how the EES meets the EES Scoping Requirements assessed against the evaluation objectives is identified in Table 1.

Table 1: City of Melbourne response to the evaluation objectives of relevance to the City of Melbourne

Assessment of specific environmental effects - Evaluation objectives	**CoM response**
Transport capacity, connectivity and traffic management – *To increase transport capacity and improve connectivity to and from the west of Melbourne and, in particular, to increase freight movement via the freeway network instead of local and arterial roads, while adequately managing effects of the works on the existing broader and local transport networks, including road, public transport, cycling and pedestrian transport networks.*	The Project does not meet the evaluation objective due to its: • Failure to assess the impacts of the Project on the local road network in North and West Melbourne. • Failure to appropriately assess the impact of the Project on public transport in the central city, North and West Melbourne and all north/south connections. • Failure to consider the impact of the Project on public transport use. • Provision of direct connections to the central city from the tollway without strategic rationale.
Built environment – *To protect and enhance the function and character of the evolving urban environment including built form and public realm within the immediate and broader context of the project works.*	The Project does not meet the evaluation objective due to its: • Failure to appropriately protect and enhance the evolving urban environment including the built form and public realm in areas of renewal including E-Gate and Dynon. • Provision of motor vehicle access to the central city which undermines the function and character of the public realm in North and West Melbourne.
Health, amenity and environmental quality – *To minimise adverse air quality, noise and vibration effects on the health and amenity of nearby residents, local communities and road users during both construction and operation of the project*.	The Project does not meet the evaluation objective as it does not adequately assess and therefore manage the impact of the Project on amenity (including air quality and noise) in North and West Melbourne.

Social, business, land use, public safety and infrastructure – *To minimise adverse effects on the social fabric of the community, including with regard to community cohesion, access to community services and facilities, business functionality, changes to land use, public safety and access to infrastructure.*	The Project does not meet the evaluation objective due to its: • Failure to assess the impact on business functionality in areas adjoining the Project, including North and West Melbourne. • Failure to undertake a cumulative social impact assessment. • Failure to determine the impact on land use on areas adjoining the Project, including the Dynon precinct north of Footscray Road.
Landscape, visual and recreational values – *To minimise adverse effects on landscape, visual amenity and recreational and open space values and to maximise the enhancement of these values where opportunities exist.*	The Project does not meet the evaluation objective due to its failure to minimise adverse impacts on the amenity and value of public and recreation open space, particularly along the Moonee Ponds Creek corridor. City of Melbourne does not agree 'that the existing urban context's ability to absorb the change' satisfies the evaluation objective as it does not reflect the significant urban renewal that is underway in these critical central city environs. It is not clear whether the EES has fully addressed this scoping requirement as relevant specialist research and recommendations are spread over a number of separate technical reports.
Hydrology and water quality – *To avoid or minimise adverse effects on surface water and groundwater quality and hydrology in particular resulting from the disturbance of contaminated or acid-forming materials, and to maintain functions and values of floodplain environments.*	The evaluation objective for surface and ground water did not require sufficient assessment of the impact of the Project. • The Project should be assessed to avoid the adverse effects on surface water and ground water quality and hydrology, in particular resulting from the disturbance of contaminated or acid-forming material. • The Project also needs to be assessed against the objective to maintain functions, values and storage capacity of the existing floodplain environments, and ensure no increase in flood levels during the construction or operational phases of the Project.
Biodiversity – *To avoid or minimise adverse effects on native terrestrial, aquatic and inter-tidal flora and fauna, and address opportunities for offsetting potential losses consistent with the relevant policy.*	The evaluation objective for biodiversity did not require sufficient assessment of the impact of the Project as it does not capture the extent of the impact in the urban context. Therefore the EES has not adequately assessed the impact of the Project in the urban context.

Environmental Management Framework – *To provide a transparent framework with clear accountabilities for managing environmental effects and hazards associated with construction and operation phases of the project, in order to achieve acceptable environmental outcomes*.	The Environment Management Framework proposes inadequate governance to ensure the Project meets this evaluation objective.

ATTACHMENT C - SUMMARY OF CITY OF MELBOURNE ISSUES BY TOPIC

Topic	Issue	Comments
1. ***Project rationale***	There is no strategic or policy rationale to provide additional motor vehicle access to the central city.	• The Project is in direct conflict with the recommendations of the primary supporting strategic reference identified – the Eddington Study: "providing additional car access to the CBD should not be a priority for Melbourne's transport network" (2008 Eddington, p40). • A majority (54 to 65 per cent) of city-bound morning peak vehicles using the Footscray Road elevated section of the Project would access the central city. • The Project fails to integrate transport and land use planning and is embedding car dependency and urban sprawl across Melbourne's west. • The Project fails to significantly reduce Melbourne's reliance on the M1 and the M1 will remain congested after the Project is completed. • The Project does not adequately consider changing population, land use or future transport changes. • Assumptions made in relation to the Port of Melbourne fail to consider a second port, and are based on out-dated research and data. The EES also fails to demonstrate consideration of the growing importance of Webb Dock compared to the role of east and west Swanson Dock and Appleton Dock into the future. This will significantly alter freight access requirements.
2. ***Transport***	Significant congestion is predicted in the EES across North Melbourne and West Melbourne as a direct result of the Dynon Road connection.	• Analysis of the traffic modelling shows that traffic going to and from the Dynon connection will use up most of the available capacity on key east/west streets in North Melbourne (Gatehouse, Arden, Queensberry and Victoria). This would result in peak hour conditions in both directions for 12-14 hours per day on these streets. • The roadway to local street connection is in direct conflict with the City of Melbourne's Transport Strategy (2012) and work completed by City of Melbourne to reduce through traffic in local areas over many years.

	EES traffic modelling is inadequate and is likely to have underestimated the actual traffic impacts in 2031 both with and without the Project.	• The EES fails to appropriately model and assess the impact of traffic in the central city and surrounding neighbourhoods. • Traffic modelling has failed to appropriately model the effects of induced demand as recommended by the Victorian Auditor-General Report (Management of Major Road Projects 2015). • There are a number of assumptions under the 2031 base case that can be disputed, resulting in exaggerated Project benefits. Key assumptions of significance include: no Metropolitan Intermodal System, CityLink Toll forward estimates, Melbourne Metro construction and impacts. • The selected date for assessment of the Project impacts is unsuitable. The EES is therefore highly likely to understate the 'whole of life' effect. • Travel time benefits are overstated and unlikely to represent a majority of trips in 2031. • The 10-year, post construction scenario, does not consider the additional traffic growth induced by the Project as land use responds to the new infrastructure. • The 2031 base case modelling assumes that CityLink tolls are in place. The scheduled removal of tolls in 2035 would significantly alter traffic modelling. The removal of tolls would reduce the volume of through traffic (toll avoiders) in the City of Melbourne and should represent the base case or 'no project' scenario for assessment.
	Impacts on public transport have not been adequately assessed in the EES process.	• The EES fails to identify the dis-benefits experienced by users of the public transport network, particularly North/South tram services in North Melbourne and Carlton. • The City of Melbourne does not support any treatments to the local street network to increase motor vehicle capacity or which prioritises cars.
	Failure to capitalise on increased roadway capacity.	• Footscray Road maintains 18 lanes of traffic. This is an unacceptable outcome. The City of Melbourne submits that the Footscray Road connection to CityLink should be (a) via tunnel, (b) at ground-level or (c) a higher elevated structure with a reduction of

		lanes at ground level.
3. ***Open space***	Impacts on future public open space (Capital City and Municipality) and the connections.	• The value of Moonee Ponds Creek corridor connecting Arden and Docklands will be compromised. This is a vital open space resource for these urban renewal areas and the impacts are inadequately assessed in the EES. • The Project will severely compromise E Gate's frontage to Moonee Ponds Creek and the amenity and value of this open space. The Project will also introduce significant visual barriers including the 20 metre high Wurundjeri Way extension and the elevated Dynon connection. • The Project will undermine access from/to adjoining neighbourhoods.
	Inadequacy of open space offsets.	• Offsets are not considered to mitigate the impact or loss of existing and future opportunities that result from the Project.
4. ***Surface water***	Water sensitive road design and drainage	• Clarity is required around the proponent's expectations in regard to asset ownership and location of these systems. • Water Sensitive Urban Design with integration into the landscape is not presented in the EES. • The Project design fails to demonstrate that it achieves best practice in relation to surface water, drainage and waste water disposal.
	Surface water quality	• The Project fails to ensure all works within the waterway enhance the amenity, habitat values and natural values of the creek environment. • The Surface Water Impact Assessment does not consider the potential impact to the local drainage network. • The pylons in Moonee Ponds Creek represent an inadequate design response.
	Bank stability	• The Project must consider the stability of the creek and river bank during operation. The current response is inadequate and waterways must be rehabilitated in line with City of Melbourne policy and objectives.
5. ***Identified urban renewal areas***	Project benefits claimed in the EES are not	• The EES states "improved connectivity and accessibility provided by the Project would help to

	supported by analysis of the Project.	attract residents and businesses to the Arden-Macaulay, E-Gate and Digital Harbour precincts. The (Project) would not preclude active transport connectivity between these urban renewal areas and would not preclude future development of these areas as anticipated (2-31).” The City of Melbourne considers this statement to be false and there is no evidence provided to support this claim. • Significant negative impacts of this Project on evolving urban renewal areas have not been adequately considered.
	Impacts on Dynon urban renewal precinct	• There has been no assessment of impact on future land use due to the presence of the Project infrastructure in the Dynon precinct. The Project needs to consider the impacts for the life of the Project, where renewal opportunities have been identified.
	Impacts on E-Gate urban renewal precinct	• The Project will reduce land available for redevelopment. The value of E-Gate means that the Project should respond to established policy as the existing conditions. Benefits obtained through urban renewal outweigh those obtained through increased vehicle access to the central city.
	Impacts on Arden-Macaulay identified urban renewal precinct	• It is not clear that the EES has appropriately assessed the impact of the Project, including changed noise and air quality on the areas identified in the Arden Macaulay Structure Plan.
6. ***Visual impacts***	Impacts on Maribyrnong River	• The Project has significant impacts regarding overshadowing and visual amenity over and surrounding the Maribyrnong River. An alternative design for Port access should be considered on Port of Melbourne land. This will allow future public access to the waterfront, minimise visual impact (including on heritage buildings in Maribyrnong) and facilitate revitalisation and regeneration of the ecological and habitat corridor.
	The Visual Impact Assessment is inadequate	• A number of key viewpoints are missing – including from E-Gate and Dynon urban renewal areas. • The EES takes the view that the areas along the road alignment are degraded and so “can absorb the changes proposed by the project”. City of Melbourne does not agree with this statement.
7. ***Connectivity***	Numerous issues	• Conflict where the new Footscray Road shared path

	and shared path network	identified relating to the alignment and design of shared use path elements, and failure to adequately manage or mitigate associated impacts.	(veloway) connects with Footscray Road at the new Docklands Primary School. • The Project further compromises Dudley Street underpass. • The Project fails to connect to the existing network and address existing safety concerns that will be exacerbated by the Project.
		Inadequate consideration of the operation of the proposed veloway.	• Safety and user experience within the veloway (air quality, noise, security etc.) not examined. • No planning for what future cycle volumes might be. • Width of path has been arbitrarily selected.
		Benefits identified in the EES for pedestrians unlikely to be achieved.	• The EES identifies the following benefit "Improved local connectivity for pedestrians and more pedestrian friendly local streetscapes". The City of Melbourne purports that the Project will have the opposite effect on local neighbourhoods in North and West Melbourne due to increased congestion.
8.	***Urban ecology, urban forest and biodiversity***	Impacts of tree removal, reduction and displacement.	• Loss of 744 trees equates to approximately 15,500 square metres of tree canopy cover in City of Melbourne. The Tree Replacement Program must be based on achieving 40 per cent canopy cover within City of Melbourne rather than a ratio calculation for trees removed. Replacement must be achieved in line with City of Melbourne's Urban Forest Strategy and associated precinct plans. • The EES fails to appropriately recognise the value of non-indigenous vegetation or the time it takes for trees to develop hollows. • Describing trees as "amenity" trees represents an inadequate assessment– all vegetation has multiple functions.
		Impacts on Moonee Ponds Creek.	• The Project does not appropriately consider the urban context of ecology and biodiversity along the creek corridor. More extensive assessment is needed to ascertain the existing conditions. • The section of the creek that the Dynon Road connection crosses is currently unencumbered and has ecological value. The impact of the roadway infrastructure on the renewal of the creek corridor will be significant. It will prevent the realisation of

		City of Melbourne's policy "Nature in the City" and the revitalisation of the creek corridor (cross government collaboration).
	Footscray Road elevated structure.	• The Project must achieve replanting of canopy cover in the areas experiencing the greatest loss of trees. Off-setting elsewhere within the Project corridor is inadequate. • The current design of the elevated structure severely undermines Footscray Road as a boulevard (as established in policy).
9. ***Landscape design, implementation and management***	The Project fails to appropriately respond to the evaluation objective to maximise the enhancement of visual amenity, recreational and open space values.	• The 'Proposed Landscape Plans' that have been produced are at a very early stage of resolution (pre-master plan). • The Project does not demonstrate the integration of technical outputs into an all-embracing plan for the public realm.
10. ***Aboriginal cultural heritage***	The EES should identify 'intangible heritage places of cultural value'.	• Examples include; the West Melbourne Swamp, original alignment of Yarra River, West Melbourne escarpment and the Moonee Ponds Creek and Maribyrnong River.
11. ***Noise and vibration***	Significant noise impacts upon identified urban renewal areas without any mitigation measures proposed.	• Predicted noise levels above 75 dB on the eastern extent of the Dynon urban renewal precinct. • An increase of up to 5 dB is anticipated across the entire E-Gate urban renewal area.
	Significant noise impacts upon the Moonee Ponds Creek corridor.	• Predicts noise impacts in this area of approximately 71 dB. • The Project EPRs are inadequate, finding outdoor recreation and public open spaces not to be noise sensitive.
	Increase in traffic on local streets in North and West Melbourne resulting in noise increase.	• The impact of additional traffic on local streets as a result of the Dynon Road connection has not been adequately assessed.
12. ***Heritage***	First principles heritage study for the affected area has not been prepared.	• This study would ensure that all heritage, whether previously identified or not, is assessed and the potential impacts of the Project are fully understood. • Design and construction management principles should be developed in order to minimise physical and visual negative impacts on known culturally

		significant places. • The EES makes neither direct nor tangible commitment to the protection of items of cultural significance during demolition and construction.
13. ***Social***	A cumulative social impact assessment has not been undertaken.	• Further examination is required to describe the full impact and lived experience of those communities most affected throughout the various phases of the Project and to facilitate public comprehension of the Project.
	Creative Strategy	• A Creative Strategy which guides the delivery of an agreed creative vision for the Project must be established.
14. ***Business***	The EES fails to address a number of concerns relating to the business environment in the North and West Melbourne, Kensington and Docklands areas.	• City of Melbourne is concerned that businesses will not foresee issues arising from a project of this scale and magnitude. • Traffic modelling for North Melbourne inadequately assesses the impact on amenity and commerce for local businesses due to increased congestion. • The assertion (ES-49) that disruptions during construction to businesses would be minimised as much as possible inadequately addresses the concerns within business precinct areas.
15. ***Sustainability***	Sustainability vision	• A sustainability vision for the Project must be established and a sustainability plan prepared. • The Project presents the State with the opportunity to deliver an innovative response.
16. ***Future disruption***	The EES fails to demonstrate how it has considered future disruption.	• Failure to demonstrate how the Project has considered changes to transport patterns and the management and construction of roadways, due to smart technologies, which are likely to occur during the life of the infrastructure.

ATTACHMENT D - CITY OF MELBOURNE POLICIES

The Project should respond to and effectively demonstrate how it contributes to endorsed City of Melbourne policies. It should also demonstrate how it will not detrimentally impact outcomes sought through policy or impact on neighbourhoods within the City of Melbourne.

The following City of Melbourne policies have been approved by Council after extensive and robust community consultation and form the basis of City of Melbourne's submission. The EES does not demonstrate that it has appropriately considered all of these policies.

- Transport Strategy 2012
- Open Space Strategy 2012
- Urban Forest Strategy 2012
- Urban Forest Precinct Plans (North and West Melbourne and Docklands) 2014-2024
- Tree Retention and Removal Policy 2012
- City North Structure Plan 2012
- Arden Macaulay Structure Plan 2012
- Road Safety Plan 2013 - 17
- Walking Plan 2014 - 17
- Zero Net Emissions by 2020 Update 2014
- Bicycle Plan 2016 – 2020
- Submission to Plan Melbourne Refresh – Discussion Paper October 2015
- Heritage Strategy 2013
- Council Plan 2013-17 and Draft Council Plan 2017-21
- Arts Strategy 2014-17
- Melbourne Planning Scheme – including the Municipal Strategic Statement and the Exceptional Tree Register
- Nature in the City 2017
- Beyond the Safe City Strategy 2014-17
- Homelessness Strategy 2014-17
- Aboriginal Heritage Action Plan 2015-18

- Retail and Hospitality Strategy 2013-17
- Climate Change Adaptation Strategy 2009 and Refresh 2017
- Places for People 2015
- Public Art Framework 2014-17
- Waste Resource Recovery Plan 2015-18
- Waste Management Strategy 2005
- Tourism Action Plan 2015-18
- Docklands Community and Place Plan 2012
- Docklands Public Realm Plan 2012
- Docklands Design Construction Standards 2013
- Docklands Waterways Strategic Plan 2009-18
- Access Docklands 2013
- Public Lighting Strategy 2013
- Queen Victoria Market Master Plan 2015
- Total Watermark – City as a catchment – Update 2014
- Motorcycle Plan 2015-18
- Road Management Plan 2015
- West Melbourne Structure Plan (draft June 2017)
- Community Infrastructure Development Framework 2014

In addition to the endorsed policy listed above, the Project should demonstrate consideration of the Future Melbourne Community Plan 2026.

This submission is also informed by the requirements of the *Environment Effects Act 1978*, the *Major Transport Projects Facilitation Act 2009,* the *Transport Integration Act 2010* and the *Planning and Environment Act 1987.*

APPENDIX A.1 - PARTICIPATE MELBOURNE SURVEY

51 Submissions

Please note that not all respondents answered every question. Comments in the below table are as submitted by respondents and have not been edited to amend spelling or grammatical errors.

- Do not support: 34
- Support: 3
- Support with changes: 14

Most important issue by ranking

- Traffic in Local areas (22, 10, 7)
- Physical connections to other areas (8, 10, 5)
- Noise and Amenity (4, 10, 12)
- Elevated structures (5, 2, 5)
- Impact on E-Gate and other areas identified for change (3, 5, 6)
- Moonee Ponds Creek (2, 5, 4)
- Impact on existing open space (2, 3, 6)

Submissions from:

- Residents: 40
- Business owners/managers: 6
- Workers: 16
- Visitors: 6

Have you previously participated in the community consultation run by the Western Distributor Authority/Transurban?

- Yes: 20
- No: 23
- Aware but didn't participate: 6

CITY OF MELBOURNE SUBMISSION

Submission number	Support Project?	Changes, if any, you would like to see on the Project	Top issues	2nd	3rd	Other Key issues	What do you think about the Project	Other thoughts or comments
1	No	Protecting residential areas from diesel particulate. More information traffic impacts - as a percentage rather than # of cars with no reference point.	Traffic in local areas	Impact on existing open space	Noise and amenity	As an inner city resident I am concerned about air quality.	I think it;'s a retrograde step - we should be promoting more sustainable forms of transport. Also this project blocks and prevents the E-Gate proposed rehabilitation / development.	I hope City of Melbourne can be a strong advocate for local residents and open space.
2	No	Will prevent development of E-gate, will swamp city centre with cars, is this what we want for the future of our city?	Impact on E-Gate and other areas identified for change	Traffic in local areas	Noise and amenity	Will swamp city centre with cars	Terrible	/
3	No		Elevated Structures	Noise and amenity	Traffic in local areas	The removal of the new Railway park at North Melbourne station, and the 2 historic turntables	Ill thought out, and just a cash grab by transurban. I have not heard of one benefit so far that could change my mind	I have lots of thoughts, but as I think of them I get angrier, so I hope that the City of Melbourne can stop the project so we can retain the livable city title!
4	No	Too expensive & inefficient; By the time this WGT project is complete, cars (as we know them) will be heading towards being obsolete.	/	/	/	Can the bike-path between Hall St Spotswood to Francis St Yarraville be built ASAP; next to the train line.	A dodgy deal with a greedy company (if its only 'affordable' with their input, its not really affordable.)	thanks for the opportunity for input.
5	Yes	/	Physical connections to other areas e.g. West Melbourne to E-Gate/Docklands	Impact on E-Gate and other areas identified for change	Elevated Structures	/	/	/
6	Yes, with changes	I don't understand how ending a freeway at Wurrendjeri Way can be good for anyone. It didn't work for the Eastern Freeway ending at Punt	/	/	/	/	/	/

CITY OF MELBOURNE SUBMISSION

Submission number	Support Project?	Changes, if any, you would like to see on the Project	Top issues	2nd	3rd	Other Key issues	What do you think about the Project	Other thoughts or comments
		Road. Traffic in Docklands is already extreme and have studies on traffic coming from Port Melbourne to it						
7	Yes	I would like to confirm that 4.6m loaded stockcrates will be able to use the tunnel. Currently loaded stockcrates have to take alternate routes around tunnels if loaded. This incurs additional tolls vs unloaded return journey through the tunnel.	Physical connections to other areas e.g. West Melbourne to E-Gate/Docklands	Traffic in local areas	Noise and amenity	Heavy vehicles in general, as this will be a key freight route. Tolls encouraging heavy vehicles to use freeways are already high, I think there should be some sort of assurance that costs will be feasible.	It will give an alternate route in Melbourne, I think it will be well utilised.	Please help the heavy vehicle sector with a public education campaign about sharing freeways with trucks. Good safe operators want to use roads safely and we want the car driving public to do the same. We need cars to be educated about safe driving around trucks, and car drivers have to be reminded that trucks have to use big roads to get them off small roads. Tolls are becoming unreasonable for livestock transporters, extra toll point if taking alternate route around Domain Tunnel when loaded. Signage and enforcement are a must. Good lighting in tunnels is also vital."
8	Yes, with changes	Additional consideration needs to be given to spotswood residential areas to ensure air quality is optimal and that noise is minimised as much as possible.	Noise and amenity	Traffic in local areas	Impact on existing open space	Lighting impacting residential areas.	Poorly planned. These considerations should have been undertaken prior to a contractor being selected. It seems ridiculous that a project is awarded when the scope is not yet defined.	Details of the impacts upon residents in each area should be sent out. Not broad summaries without detail or significance.
9	No	/	Traffic in local areas	Noise and amenity	Impact on existing open space	/	/	/
10	No	It to be cancelled	Traffic in local areas	Elevated structures	Physical connections to other areas e.g. West Melbourne to E-Gate/Docklands	Traffic shouldn't be funnelled into the city	I hate it	/
11	No		Noise and amenity	Elevated Structures	Traffic in local areas	/	While I agree with the need for second river crossing, east west link would have made more sense. All this will do is	/

CITY OF MELBOURNE SUBMISSION

Submission number	Support Project?	Changes, if any, you would like to see on the Project	Top issues	2nd	3rd	Other Key issues	What do you think about the Project	Other thoughts or comments
							move trucks from yarraville to spotswood	
12	No		Moonee Ponds Creek	Physical connections to other areas e.g. West Melbourne to E-Gate/Docklands	Impact on E-Gate and other areas identified for change	Maribyrnong River bridge plans kill navigability. Any city beyond 4 million which keeps building radial tollways quickly chokes. Only giving commuters and consolidated freight other mode choices reduced congestion, not building more roads.	Politically treacherous, ill conceived and certain to make mistakes of detail from end to end due to allowing Transurban anywhere near the state planning vacuum. Must be prevented.	Said Yes to "community consultation" but found them to be one way information sessions. Attended earlier rounds in West Melbourne and Docklands and expect to suffer at least one more. The disrespect this proposal shows for the careful and detailed work done by the City of Melbourne has done planning for brownfield sites and services in the vicinity of the rail yards and Moonee Ponds Creek beggars belief. Stay strong.
13	No	MORE ROADS=MORE TRAFFIC=MORE POLLUTION. Public transport is the key to reduce traffic.	Traffic in local areas	Noise and amenity	Physical connections to other areas e.g. West Melbourne to E-Gate/Docklands	TRaffic in local areas, esp inner west suburbs.	Inadequate planning.	"Removing trucks from inner west streets? What a joke.
14	Yes, with changes	We want changes to the way the project has been extended to funnel traffic into the City of Melbourne and inner suburbs	Traffic in local areas	Noise and amenity	Impact on E-Gate and other areas identified for change	/	We support the original concepts of removing trucks from the western suburbs and providing connection to City Link but we oppose the way it has been extended to funnel more traffic into the centre of Melbourne and inner suburbs	/
15	Yes, with changes	The elements of the project that are designed to bring more traffic into the centre of Melbourne and through the inner northern suburbs need to be changed	Traffic in local areas	Noise and amenity	Moonee Ponds Creek	/	I am supportive of the original purpose to provide better routes for traffic to and from the Port and remove trucks from the western suburbs. Connection to Citylink is OK but additional links to take more traffic into centre of city is not supported.	/
16	Yes, with changes	The project should not end at Wurrendjeri Way. It should connect to other freeways	Physical connections to other areas e.g. West Melbourne to E-	Traffic in local areas	Impact on E-Gate and other areas identified for change	A new school for Docklands has been announced. The project will be very close to the new school. How are	Linking freeways is great. Ending a freeway at a street in the city is ridiculous. Have you learnt nothing from the	I have lobbied for over 7 years for a primary school for Docklands. Finally a site is chosen and it is now very close to a huge freeway. How do you mitigate noise, pollution and access?

CITY OF MELBOURNE SUBMISSION

Submission number	Support Project?	Changes, if any, you would like to see on the Project	Top issues	2nd	3rd	Other Key issues	What do you think about the Project	Other thoughts or comments
		and not end at the city. Wurrndjeri Way is already gridlocked. It will also bring traffic from the South into the City to access the new route. It will isolate Docklands.	Gate/Docklands			you going to mitigate noise, pollution and access to the school? The project will isolate the student population which is coming from West Melbourne	Eastern ending at Punt Road? Let alone the fact that you restrict further expansion of Southern Cross and North Melbourne Rail and isolate	Docklands and the CBD desperately need new secondary school access. Land in Docklands is now gone and the community is relying on surrounding suburbs to support this. E-gate is now decimated and the link between Docklands, West Melbourne and the CBD is obliterated by a freeway. Where will our students access secondary school. The project fragments the whole linkage of the biggest infill in Melbourne's history. Melbourne won't be the most liveable city Arden Macaulay, North Melbourne, West Melbourne, Docklands, South Wharf, Montague and the precincts of Fishermans Bend should all link by foot, bicycle and public transport. This won't happen with a freeway splitting it in half. The proposal to funnel cyclists into Wurrendjeri Way and Docklands is ill conceived at the moment. Docklands has a huge issue with cyclists moving at speed through pedestrian thoroughfares. How are you going to cope with this before pedestrians get hurt, particularly when a school is in the firing line? No traffic study has been done that i am aware of that looks at the increase in traffic coming from the South to access the new freeway. Of course traffic from the City of Port Phillip including Port traffic will use Wurrendjeri Way to access the road. Why has no study been done? City of Melbourne need to robustly debate the data and feasibility studies that have been conducted by the Project, in the area of traffic flow. They are not correct and CoM need to use the staff with qualifications in this area to hold the Project to account. Does this Project impact further development of rail infrastructure? If so why on earth would you support it ending at the City of Melbourne
17	Yes, with changes	Major reconsideration needs to be given to the proposed Veloway and impact on local	Physical connections to other areas e.g. West Melbourne to E-Gate/Docklands	Traffic in local areas	Noise and amenity	Veloway: cyclists will be travelling at speed when they exit and enter Docklands. This will considerably add to the problematic pedestrian-	The transition points have not been well considered and the communities that are impacted at the end points have not been	Cycling paths in Melbourne need to be rethought in terms of transport infrastructure. The bike path along Harbour Esp is not well designed to carry the proposed increased numbers (most especially as this pathway crosses pedestrian zones and there are

CITY OF MELBOURNE SUBMISSION

Submission number	Support Project?	Changes, if any, you would like to see on the Project	Top issues	2nd	3rd	Other Key issues	What do you think about the Project	Other thoughts or comments
		traffic in Docklands. Docklands community is largely unaware of the impact that this project will have upon the cycling path along Harbour Esp & the flow of local traffic.				cyclist relationship that exists along Harbour Esp. I believe an entire rethink of cyclists pathway is required.	adequately included. Greater thought needs to be given to what happens to the traffic (car & bike) when the exit this structure	growing numbers of incidents involving pedestrians and animals). Harbour Esp bike path is more suited to visitors wishing to enjoy the local scenery. There is opportunity to consider the travel destinations of cyclists and incorporate these into this project (ie an exit into the city, possibly utilsing/following the railway tracks). At the same time, thought can be given to the unacceptable combination of cyclists and pedestrians along South Whalf.
18	Yes, with changes	We do not support the roadway across the E Gate site.	Traffic in local areas	Impact on existing open space	Moonee Ponds Creek	Polution (Noise and Air) Total disregard for future potential of the inner west	2/10	
19	No	No off ramps into North and West Melbourne				Impact on additional traffic feeding into planned Arden Macaulay renewal.	Disaster for North and West Melbourne	It makes no sense to build off ramps to take cars through residential streets to the hospitals and universities. Parking at these destinations is already at capacity. Melbourne Metro will have a hospitals/university station so there is no need to create ways for additional cars to get there. Cycling routes between Adren Macaulay and the hospitals and universities will be ruined if streets are choked with traffic.
20		Instead of building more roads, we should upgrade public transport and impose a CONGESTION CHARGE and then an EMISSIONS CHARGE on cars driven into the City of Melbourne. This has been in place in London for about a decade.				Congestion and pollution in the whole of the city. (The program won't let me rank the issues above)	An expensive and outdated response to the problem.	It is well documented that Melbourne is growing rapidly. Congestion is already a problem and will only get worse unless vehicular traffic is reduced. The tunnel project by its own admission will increase, not decrease, traffic in and around the city of Melbourne. Instead, we should divert through traffic, increase public transport and penalise the use of cars within the city. Other cities (London and Paris) have shown that it can be done. Why are we not learning from their experience?
21	Yes, with changes	Minimize re-routing of additional vehicular traffic through North	Traffic in local areas	Physical connections to other areas e.g. West Melbourne to E-	Physical connections to other areas e.g. West Melbourne to E-	Lack of intergration with Arden-Macaulay Strucure Plan	/	New primary school for North/West Melnourne

CITY OF MELBOURNE SUBMISSION

Submission number	Support Project?	Changes, if any, you would like to see on the Project	Top issues	2nd	3rd	Other Key issues	What do you think about the Project	Other thoughts or comments
		Melbourne and Harker/Curzon, Queensbery and Arden Sts in particular. Maintain inter gritty of E-Gate site for future public development (school) and ensure pedestrian and cycling links						
22	Yes	/	Traffic in local areas	Physical connections to other areas e.g. West Melbourne to E-	Noise and amenity	Impact on spencer st traffic	Pleased it will reduce trucks on local roads	
23	No	/	Impact on E-Gate and other areas identified for change	Physical connections to other areas e.g. West Melbourne to E-	Noise and amenity	/	The negative impacts on e-gate and west melbourne will be major and irrevesable.	
24	No	Strongly oppose more tolls, this plan does not ease traffic problems it just move them from one place to another, will negatively impact on North and west Melbourne residents and really aren't we dealing with enough negative implications due to bad plans	Moonee Ponds Creek	Noise and amenity	Elevated structures	Environmental degradation, community disconnection as major roads can't be crossed and create community barriers		/
25	No	/	Noise and amenity	Physical connections to other areas e.g. West Melbourne to E-	Traffic in local areas	The project seems to distribute a significant amount of additional traffic through North and West Melbourne. This increase in through	A large infrastructure spend with significant amenity impacts on North and West Melbourne residents for a relatively modest	/

CITY OF MELBOURNE SUBMISSION

Submission number	Support Project?	Changes, if any, you would like to see on the Project	Top issues	2nd	3rd	Other Key issues	What do you think about the Project	Other thoughts or comments
						traffic brings few benefits to this community and only creates more congested roads and pollution.	improvement in traffic movement for people who want to go from the West Gate through to the University precinct.	
26	No	We need a bridge from North Melbourne station to the Docklands. The suburb should not be divided with a huge overpass Road	Physical connections to other areas e.g. West Melbourne to E-	Impact on E-Gate and other areas identified for change	Traffic in local areas		I don't want it!	/
27	No	I object to the extra traffic being funnelled through North and West Melbourne. It's lazy planning. I live on Victoria St and it can't cope with the thousands of extra cars per day.	Traffic in local areas	Impact on existing open space	Noise and amenity	The corner of King, Curzon and Victoria Streets is already extremely dangerous and busy. You will create a traffic nightmare. Further, Victoria St from Curzon to Munster Terrace is a residential area with many families living there. It's not a freeway	Lazy Planning	/
28	No	It to not deposit cars and trucks to north and west Melbourne	Impact on E-Gate and other areas identified for change	Traffic in local areas	Noise and amenity	/	The residents of Yarraville have complained about trucks in their area. This project will shift the problem to North and west Melbourne. Yarraville was a truck route before its recent gentrification. This proposal moves yarraville's trucks to inner city	/
29	/	/	Physical connections to other areas e.g. West Melbourne to E-Gate/Docklands	Traffic in local areas	Moonee Ponds Creek	/	Needs more consideration of adjoining areas	/
30	Yes, with	change the route	/	/	/	we were told that the	bad consultation	

CITY OF MELBOURNE SUBMISSION

Submission number	Support Project?	Changes, if any, you would like to see on the Project	Top issues	2nd	3rd	Other Key issues	What do you think about the Project	Other thoughts or comments
	changes	of long tunnel to go under industrial land. the tunnel is for industrial traffic and should go under industrial land				tunnel cannot go under oil storage containers because it is dangerous. then it must be dangerous to residents too.	process with changes to initial concept design that impact our home dramatically. We did not agree to this new long tunnel route.	
31	Yes, with changes	/	Noise and amenity	Physical connections to other areas e.g. West Melbourne to E-Gate/Docklands	Elevated structures	Sound Barriers lacking on Wurrundjeri Way extension - no need for elevation	Very poor decison for West melbourne to meet Transurban's toll objectives, not to minimise impact (which is what an EES should look to do.)	Noise Assessments should be re-done - Can CoM pay for an expert witness on very rubbery noise data for the hearing?
32	No	/	Traffic in local areas	Physical connections to other areas e.g. West Melbourne to E-Gate/Docklands	Noise and amenity	Traffic is being redirected but not lessened or speeded, up at huge cost to taxpayer and local residents.	As above. Overall it does not achieve much but costs a lot.	No.
33	No	/	Traffic in local areas	Impact on existing open space	Noise and amenity	I would like to see what a rail cargo system could do for improving costs of transport, air and noise pollution and safety.	I do not support as it does nothing to promote a proper review of cargo movement and inner suburban amenity. It is unacceptable to put residents in these areas at further risk whilst ignoring other alternatives that could provide a solution.	
34	No	We need a better way to get containers from the port. Heavy or light rail - whatever works.	Traffic in local areas	Moonee Ponds Creek	Impact on existing open space	The project encourages traffic to go through residential streets to avoid tolls.	A money grab from Transurban.	Back to the drawing board please.
35	Yes, with changes	According to project consultants, pedestrian access between West Melbourne and Docklands is a City of Melbourne	Physical connections to other areas e.g. West Melbourne to E-	Traffic in local areas	Noise and amenity	The authority is taking no responsibility for traffic management, flow and congestion in West and North Melbourne. Their Tunnel Project spews out cars into our	The business case for the road is weak, but it is supported because it delivers on the Government's agenda for 'jobs and growth' ahead of the 2018 election. West	To clarify my answer to the first question above: I don't 'support' the Westgate Tunnel Project per se, but I also don't see any point in objecting to development: I believe in just trying to make the best of the situation. I am also concerned about issues of noise from the Wurundjeri Way flyover, future

Submission number	Support Project?	Changes, if any, you would like to see on the Project	Top issues	2nd	3rd	Other Key issues	What do you think about the Project	Other thoughts or comments
		problem, and is therefore out of scope of the Tunnel Project. The project authorty needs to be lobbied to address this issue now within scope.				neighbourhood without addressing the local community's pedestrian and cycling needs.	Melbourne, Docklands and North Melbourne residents are clearly not priority constituencies.	development potential of E-Gate site, but I really feel that the issue of pedestrian access between West Melbourne and Docklands is something that City of Melbourne could – and should – successfully campaign the Tunnel Authority to fix. If the state government's plan for a new Docklands school goes according to schedule, it is highly likely that my kids will be going there from 2021. My house in West Melbourne is only a 600 metre walk to the new Docklands school site but the route along Dudley St and across the Footscray Rd intersection is too perilous currently to consider a school-aged child commuting from West Melbourne or north of the CBD to ever walk alone … and it is only going to get worse with the new Westgate Tunnel Project. I understand that improving Dudley Street and the underpass is part of the new West Melbourne structure plan currently under development, but it baffles me why City of Melbourne wouldn't want to see this issue addressed sooner through the Westgate Tunnel Project. I don't know what truth there is to this: one of the traffic consultants at the Docklands pop-up session back in May told me that there were ways that the Tunnel Project could address this issue, but the City of Melbourne representative(s) being actively consulted by the Tunnel project team explicitly requested that this issue be left out of scope of the project as it was something that City of Melbourne wanted to address…this was a really upsetting statement to hear and I sincerely hope that it's not the case.
36	No	/	Impact on existing open space	Moonee Ponds Creek	Traffic in local areas	Focus of infrastructure spending should be on public transport and environmentally sustainable options, not cars. It will only be a short term fix to a long term problem.	It is spending money in the wrong places (i.e. cars over public transport) and will not fix traffic congestion in the long term.	/
37	No	There still seems to be no move to removing traffic	Impact on existing open space	Moonee Ponds Creek	Traffic in local areas	Research is now showing that road networks are not like	It seems to be something that is no better than the	Unlike most of the large cities in the world, Melbourne still has no train to the airport. Even Sydney and Delhi have one! When are

CITY OF MELBOURNE SUBMISSION

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		from the roads. This will increase the truckson the road. Woul dit not be better to provide rail freight instead, which would have the added effect of ebing better for the environment?				liquid pipelines, but more like gas pipelines - vehicles will quickly fill the space that is created by new roads.	Coalition's east-west link.	we going to realise that we need more trains, whether it is for moving people or freight?
38	No	Better provision for local community members walking a cycling around the neighbourhood with increased traffic on our local streets. In particular, better access from West Melbourne to Docklands for West Melbourne kids to get to the new Docklands school.	Physical connections to other areas e.g. West Melbourne to E-Gate/Docklands	Traffic in local areas	Noise and amenity	As well as the noise, the visual bulk of the new Wurundjuri flyover through the E-Gate site will adversley affect West Melb residents - the elevations mean that this will be highly visible to West Melbourne residents from our streets.	This project offers no benefits to City of Melbourne residents - no new walking or cycling tracks, no open green space, no public transport improvements etc. - all we get is traffic, pollution and noise.	The EES is too big and technical for me to understand and respond to appropriately as a layperson. I hope that City of Melbourne can dedicate the appropriate resources to responding to this on behalf of local residents on the major issues on which we are affected.
39	No	The major project elements which push traffic onto West and North Melb streets - Dynon Rd connection and Wurundjuri Way flyover - are afterthoughts to the WGTP project. These elements should not be supported as there is no supporting business case.	Elevated Structures	Traffic in local areas	Noise and amenity	North Melb, West Melb and Docklands are baring the brunt of a project that was initially designed only to improve traffic from the far western suburbs. It is not right that the Project Authority takes no responsibilty for our extra local traffic creation.	The other part of the project is fine, connecting the western suburbs to the Tullamarine Fwy, but putting extra traffic into our community is not in anyone's benefit.	The Social Impact Assessment report even notes that while there are benefits for other suburbs in the west:
40	No	There seems to be no justification for why the	Elevated Structures	Noise and amenity	Impact on E-Gate and other areas identified	The impact on West Melbourne residents will be significant and is	Helping the connection between Westgate Fwy and Citylink seems fine,	

CITY OF MELBOURNE SUBMISSION

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		Wurundjuri Way flyover is raised 10-20 metres above the E-Gate site - why doesn't it go down to ground level? The noise and visual bulk could be reduced by reducing the elevation.			for change	unjustified. This all seems to be cost-saving and revenue-raising for Transurban and State gov has given no consideration to us local constituents.	but putting out extra traffic into local streets is unacceptable.	
41	Yes, with changes	Needs to be better integrated with public transport and cycle paths. Should not increase traffic on local roads in North and Wast Melbourne.	Elevated structures	Noise and amenity	Impact on E-Gate and other areas identified for change	Arden Street and Queensberry Street are not able to accomodate the increase in traffic. North Melbourne will be dived by very busy roads. Queensberry Street is a designated as part of the cycling network: Cyclists not motorists, should be given priority.	There needs to be another Yarra crossing, but impacts on existing communities need to be better managed.	No additional comments.
42	No	A project promoting more cars in the city is not sustainable.	Traffic in local areas	Noise and amenity	Elevated structures	The bicycle veloway is not a safe solution.	A project promoting more cars in the city is not sustainable.	The City of Melbourne in the past decades has worked hard to introduce traffic calming measures aimed at optimal residential amenity within the inner city. I am very concerned about the increased volumes of cars which are predicted to be in North and West Melbourne as a result of the project. I attended a City of Melbourne information session at which I understood that the traffic projections for the area, post project, are such that a situation which is currently experienced during the am and pm peak, would be experiecned with more congestion, and for 14 hours per day. This is a retrograde step, and is not an accetpable situation within residential communities in terms of safety, amenity and noise considerations. It is not clear to me how the bottleneck situations of increased car volumes will be dealt with in the key city interfaces, in Docklands, Dudley St or Dynon road. This surely just exacerbates congestion when the

CITY OF MELBOURNE SUBMISSION

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								roads hit the established areas. The project cuts off West Melbourne from Docklands, which is a lost opportunity for Melbourne. The proposal for the new structures to abut EGate is also seriously questioned. I do not support the veloway. I ride my bicycle most days, and as a cyclist, I consider that this elevated structure would not be a safe place, could not be serviced in the case of an emergency, and is likely to be full of litter, vandalism, and a target for undesirable activities which cannot be provided with passive surevillance from the public domain. The concept of large elevated structures for roads which will run in close proximity to existing residences and business is not supported from the point of view of ugliness, and for amenity impacts. Thank you for the opportunity to make this submission, I ask that the City of Melbourne ensures that it advocates for the protection of residential amenity for its residential communities.
43	Yes, with changes	Concerns: Visual bulk of the highway due to elevation near the North Melb station (can it be lowered?). Lack of sound barrier (add barrier in a form of art?). Impact to local traffic. Limiting potential of E-Gate Development.	Elevated structures	Noise and amenity	Traffic in local areas	There are sections of freeways in Melbourne & Sydney that were free and previously paid for by the public, which is now tolled. Scrutinise Transurban's plan for any traffic redirection and road closures.	Traffic management is necessarily evil but further consideration must be given to locals who will be adversely impacted by the 'development'.	In my humble opinion, the government should save up (or borrow money) and build the road infrastructure. By allowing a commercial entity such as Transurban to build, we the people will be paying for this development indefinitely. Like some householders living off credit cards, we are living beyond our means and we (and our children) will pay dearly. A short sighted move.
44	No	/	Traffic in local areas	Physical connections to other areas e.g. West Melbourne to E-Gate/Docklands	Noise and amenity			/
45	No	/	Traffic in local areas	Moonee Ponds Creek	Impact on existing open	/	Little consideration given to existing	A ill considered project that has within CoM Council treated all adjacent industrial and

CITY OF MELBOURNE SUBMISSION

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					space		neighbourhoods and how these will be impacted. Proposed park is placed in the middle of a spagetti junction, good for wildlife maybe but how accessed by community. Giving preference to E/W cars will slow tram N/S	vacant land as areas to do what they like with. That is, it does not need to consider future land use and therefore the cost in developing this land in the future higher will be higher given the remediation required for sound walls, pedestrian conductivity and environmental damage.
46	No	/	Traffic in local areas	Impact on E-Gate and other areas identified for change	Elevated structures	There needs to be a metropolitan-wide transport plan, with an emphasis on public transport and reduction in traffic. There has been no consideration of how the project interacts with the Climate change Act.	A failure of transport planning.	The project undermines several MCC policies and plans, including the West Melbourne Structure Plan.
47	No	Reduction in the amount of traffic going into/through North and West Melbourne. Avoid any road going through the eGate site, even if an elevated road, as this would damage the amenity of this area and make it undesirable as an urban housing development.	Traffic in local areas	Impact on E-Gate and other areas identified for change	Physical connections to other areas e.g. West Melbourne to E-Gate/Docklands	Yes - the lack of a rail link to the airport!	Flawed. Clearly this was initiated by TransUrban to increase their control over Melbourne's road network & not by a state government interested in what's best for Melbourne.	Thank you for the opportunity to comment. BTW - I live in Dudley Street, so will be directly affected by the extra traffic resulting from the project if it goes ahead.
48	No	/	Traffic in local areas	Physical connections to other areas e.g. West Melbourne to E-Gate/Docklands	Impact on existing open space	West Melbourne - as a glorious place to live, walk, work, cycle and be a community - will just be collateral damage for the "greater good" ie elevated roadways and increased traffic will remove any future of linking West Melb to	This is a major project that seems ill conceived. If it has a proposed 100 year lifetime, the port facilities will have to move due to lack of space within 30 - 40 years then what? This current plan is condeming residents to a "fenced off" West	Keep up the good work CoM team! Private enterprise and State/Federal Govt projects should not get a free home run and get to build this poorly resolved project just because they get in first on the land grab for the West Melbourne/E Gate land because it is not currently being used. CoM need time to coordinate a master plan

CITY OF MELBOURNE SUBMISSION

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						Docklands.	Melbourne.	for any proposed pedestrian and recreational links to Docklands and Moonee Creek cycleways etc. and the projected future need for noise barriers etc. There needs to be time to consolidate a vision for the various new suburbs to be established in the existing rail yards (and various other small land parcels ie water/power/rail easements etc that are poorly controlled at present by other instrumentality/authorities.) There must be a clear strategy and master plan that sets out a vision for the 100 year lifetime of the Tunnel Project that benefits ALL over a very long time. Once a design is approved, it can never be put back in the bottle. We local residents will have to live with the negative legacy forever, while Transurban reap the financial profits. Thanks
49	No	/	Traffic in local areas	Noise and amenity	Physical connections to other areas e.g. West Melbourne to E-Gate/Docklands	The exit into Dynon Road and Dynon Rd. bridge will not physically be able to handle the extra vehicle numbers leading to bottlenecks difficult to drive around. Verbal information from Tunnel team of 10,000 extra car trips at the Dynon Rd. connections.	Inadequate thought about where the traffic will funnel out into the city. Seems like a future divider of suburbs, i.e. Victoria, Abbotsford and Queensberry Street extra traffic. Leave the cars at home otherwise inner city gridlock will occur regularly.	Public transport and open spaces have made the City of Melbourne one of the great world cities. Cars should not be funnelled into the City. Perhaps large nodal car parks in the outer suburbs would help ease existing congestion. i.e. Victoria St, even on weekends. Build the tunnel exclusively committed to public transport. Add more frequency of connecting trams and buses.
50	No	/	/	/	/	/	The WGTP is an overworked, unnecessarily large project based on obsolete ideology that believes traffic congestion can be addressed by building more roads. This is an outdated view. Public transport is the answer and has far less environmental impact.	The following are issues that I believe need to be analysed and assessed independently. It is not sufficient to rely solely on the proponent's calculations. There is a strong feeling in the community that new road infrastructure the scale of the West Gate Tunnel Project (WGTP) is unwarranted. It has expanded from a fairly modest plan to get trucks out of residential Yarraville streets and provide an alternative river crossing 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.

CITY OF MELBOURNE SUBMISSION

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								Government money should be spent mainly on public transport rather than on major road projects, which are viewed as obsolete solutions in progressive countries. As a West Melbourne resident, my principal concern is with the Wurundjeri Way extension and the effects of the WGTP on West Melbourne and North Melbourne. 1. A late inclusion, the Wurundjeri Way extension has been designed without any noise barriers or any ameliorating features. 2. No attempt has been made to improve the visual amenity of what will be an unsightly elevated road. By contrast, further west, attractive wall and barrier treatments have been incorporated in the design. 3. It will pass within 100–110 metres of Railway Place residences. 4. Transurban specialists and City of Melbourne (CoM) personnel agree the height of the road where it crosses over Dynon Road will be 20–21 metres. 5. This suggests that it will be higher than the street level of Railway Place at least in parts. 6. 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 will have to be retrofitted. Why not design them into the plans now? 7. Despite Transurban specialists' assurances that this is not the case, a six-lane overhead road will surely compromise any future development of the E-Gate site. Who would choose to live in its shadow? 8. It will also undermine CoM plans to beautify

CITY OF MELBOURNE SUBMISSION

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								Railway Place and provide pedestrian and bicycle links between West Melbourne, E-Gate and Docklands. Further: There are no plans to improve safety at the dangerous Dudley Street/Footscray Road intersection, which is very close to the site of a proposed new school. Also, the exit to the veloway is next to the school, creating another hazard as cyclists speed down the ramp. 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 CoM matter. While some streets are forecast to experience reductions in traffic volume at 2031 with the WGTP as opposed to without it, there will be vehicle increases in many North and West Melbourne streets — including Curzon and Queensberry — and in Parkville. One of the worst is a +5000 forecast for Hawke Street. This would jeopardise CoM plans for a 'Spencer Street village' and the possibility of extending the tram line along Spencer Street towards Footscray. It would have been helpful if present traffic volumes had been easier to find in the documents, to compare with the 'with and without' figures for 2031. This comparison might have been more meaningful. Transurban says widening the section of Wurundjeri Way between Dudley Street and Flinders Street will not preclude the laying of an extra rail track along here in the future. Could this be checked, please. Likewise, we are told that the WGTP will not impede construction of the Metro 2 rail project. Please check this. Even if there are no physical impediments, the WGTP will no doubt set back public transport

CITY OF MELBOURNE SUBMISSION

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								projects many years because of financial constraints. Public transport use is far more environmentally sound and socially responsible than encouraging greater private vehicle use. The problem of congestion at the ports should be addressed with rail freight options, not increased truck movements. Constructing more roads over Moonee Ponds Creek will cause further environmental damage from pylon works, lack of sunlight and potential pollution. The beneficial effects from augmented open space along the creek are, I believe, overstated. Additional open space may not even eventuate. The Maribyrnong River will also suffer from 'bank widening'. Apparently pylons will be sunk in the river to support the new bridge. What effects will this have on important river life such as eels and the Australian grayling? PS: The section above, "What issues are most important to you (please rank)?", did not provide access. However, all topics listed are important and my general submission here addresses them.
51	No	The veloway concept presents as highly problematic for both human health and public safety. Air quality should be modelled (inc. ultrafine particles) and CCTV and lighting installations alone are unlikely to provide adequate safety (real and perceived).	Traffic in local areas	Moonee Ponds Creek	Impact on E-Gate and other areas identified for change	The likely impact of additional traffic in North and West Melbourne on trams traveling north-south and bicycles traveling east-west. The proposal increases car access to the City and Docklands when public and active transport modes should be top priority.	A crude response to Melbourne's transport challenges. The strategic goals could be met by combining the more modestly scaled projects described in the 2008 Vic Transport Plan (West Gate Distributor and Geelong Rd to Port tunnel) with a port-rail shuttle.	We have the following concerns about the strategic approach to the proposal and the design of several major elements. Short-term outcome for big infrastructure spend: The project will not substantially reduce network-wide congestion between now and 2031. EES traffic projections paint a somewhat rosy picture of the project's ability to alleviate congestion by comparing a 2031 'do nothing' base case with a 2031 project case. Along many secondary routes assessed by the study (excepting areas where truck bans are proposed) congestion will not improve relative to present levels. This raises questions about the lifespan of the project and

CITY OF MELBOURNE SUBMISSION

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								the long-term value that it yields for toll road users, impacted communities, and the public at large. It also suggests that additional and substantive investments in road infrastructure will be required to alleviate congestion in Melbourne's west within 15-years. Moreover, the project touts a reduction in truck traffic but cars makes up a majority of vehicle movements causing congestion; public transport alternatives would arguably afford a more appropriate and sustainable way of addressing this challenge. The West Gate Tunnel presents as a short-sighted and costly response to Melbourne's strategic planning challenges because it invests heavily in a relatively short-term road-based solution. Heavy-handed response relative to previous transport alternatives: The project will promote car usage by increasing the capacity of primary road transport corridors. Furthermore, connecting the West Gate Freeway to the CBD and CityLink via the Port of Melbourne will intensify the mixing of truck and car traffic. Proposals in the 2008 Victorian Transport Plan that addressed Melbourne's east-west transport divide aimed to separate car and truck traffic, thereby providing a longer-term solution to the congestion problem. The original West Gate Distributor (pre-2015) and WestLink stage 1 (comprising the Geelong Road to Port of Melbourne tunnel) proposals arguably addressed the concerns of inner-west communities while providing sensible options for medium- and long-term road network expansion. Coupled with the proposed port-rail shuttle, these proposals would have addressed the strategic transport challenges outlined in Sir Rod Eddington's 2008 study. Unfortunately, however, we will never know because genuine alternatives to the West Gate Tunnel were not seriously appraised by the Government's business case. Moreover, Infrastructure Australia and Infrastructure Victoria have not fully assessed the proposal. As a result, relative to previously proposed transport alternatives, the West

CITY OF MELBOURNE SUBMISSION

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								Gate Tunnel exhibits a heavy-handed approach to Melbourne's transport challenges. Its scale and scope are super-sized to promote the mixing of cars and trucks and, by connecting two major motorways, it will increase rather than decrease overall congestion of the road network. Substituting urban design for planning insight: Finally, major elements of the proposal adopt outdated approaches to large-scale infrastructure design. No measure of urban design skill can paper over the flyovers, large-radius turns, and sections of elevated road that evoke 1960s principles of highway planning and design: the numerous flyovers create undercroft conditions that impact upon open space corridors and strategic development sites; large radius turns on ramps and flyovers optimise for speed and capacity rather than integrating with current (and future) urban fabric and, most disappointingly, a 2.5km section of elevated road bisects not one but two waterways. The planning and design professions can and must do better than this! These design features will produce negative impacts on surrounding areas, including detriment to natural assets due to shading, constraints on potential for future infill redevelopment in the E-Gate precinct, and perceived and actual safety concerns for pedestrians and cyclists underneath the heavy structures. Overall, the design contrasts directly with – and stifles opportunities to build upon – the urban heritage and design culture that characterises Melbourne and contributes to its attractiveness as a place to live, visit, and conduct business. We believe a more nuanced combination of road and rail projects could address the economic concerns driving the West Gate Tunnel while at the same time improving Melbourne's reputation for urban planning and design excellence. Unfortunately, it appears that alternative

CITY OF MELBOURNE SUBMISSION

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								approaches have not been fully considered alongside this proposal, and urban design is again being used to tart up what is ostensibly a mid-twentieth century vision of transport planning and city design. In sum, the West Gate Tunnel proposal exhibits a lack of planning insight and sophistication and will therefore negatively impact upon Melbourne's liveability and long-term sustainability for decades to come.

APPENDIX A.2 - COMMUNITY ENGAGEMENT EVENING

mosaic LAB

CITY OF MELBOURNE

WEST GATE TUNNEL PROJECT (VICTORIAN GOVERNMENT)

Community Engagement Evening

Thursday 8th June, 5.30pm to 7.30pm,
Supper Room, Melbourne Town Hall,
120 Swanson Street

The City of Melbourne hosted a community information evening to highlight some recent insights and understanding around the Victorian State Government's Environment Effects Statement relating to the West Gate Tunnel Project (The Project). The session was informal with a presentation from Richard Smithers, Team Leader Transport Strategy at City of Melbourne with comments and questions briefly raised from members of the public as the evening progressed. The evening provided the opportunity for the community to provide their feedback on the Project.

THE PURPOSE OF THE ENGAGEMENT SESSION:

To share some initial understanding from the City of Melbourne on how the Project may impact the city, hear community views and questions in relation to the Project and outline the opportunities to provide futher comment on the Project.

COMMUNITY SENTIMENT OVERVIEW

Facilitator General Note: Participants had a range of concerns on the possible impacts the proposed project may have. The themes and notes expressed here are only a high level summary of the extent of their concerns. The majority (approx two thirds) of the participants (c. 21 attendees) felt they would not be able to support the project at all while the remaining third felt they could support but with modifications only. The City of Melbourne addressed questions and comments where possible throughout the evening. However it was clear that those in attendance, despite being well informed of the Project, were anxious about the quantity of data being presented by the Western Distributor Authority and the limited time frames in which to respond.

This report is a summary of the highlighted points noted throughout the evening and have been independently produced by the session facilitator, Keith Greaves.

A SUMMARY OF POINTS RAISED BY MEMBERS OF THE PUBLIC DURING THE INFORMATION SESSION

LOCAL TRAFFIC IMPACTS

Impact of traffic flow into Kensington is not clear and the study seems to have avoided this area.

What is the level of impact on local traffic? Does City of Melbourne know?

What about impact on Dudley Street, it seems unlikely it will be less.

Worried about load onto Docklands roads.

What about impact of Victoria Street and the Queen Victoria Market redevelopment there?

Wurundjeri Way / Montague Street already busy at peak hours – where do the 6000+ traffic units go?

Truck problems in Kensington currently are a challenge and this adds to the concern about increased impact from the Project. This has not been assessed.

Truck movements – through routes (MacKenzie Road), how will this work?

2031 – so effectively a stand still on our roads by then!

Kensington traffic not reviewed in EES.

VELOWAY

What about the health impacts from car emissions descending into the veloway?

Safety – vistas out / into the 2.5km bike path.

Safety and fumes extraction in the veloway looks implausible.

Veloway looks unsafe – how do you access in emergency?

Concerns on lack of separation of bike / walking paths.

What about emergency access to the paths?

The proposed veloway is of great concern. Its current exit point is in a high pedestrian use area – this raises major safety concerns. The design must include: 1. Calming i.e. slowing speed. 2. Additional exits to city routes i.e. not all traffic channelled to Docklands – many cyclists will wish to enter city directly.

Location of the veloway will deliver high speed cyclists out by the new Docklands primary school

The Project will generate more car traffic as opposed to public transport.

MOONEE PONDS CREEK

Need a way to make Moonee Ponds Creek really viable as a real waterway that is biologically and physically able to exist.

Moonee Ponds Creek land ownership is problematic. There needs to be integration here. Does land ownership need to change? Who should own it?

Importance attributed to Moonee Ponds Creek corridor in the EES assessment is insufficient.

General lack of action and overall impact on the creek is worrying and disappointing, why have we not built on previous lessons learned?

Moonee Ponds Creek – what is the impact on the park?

CONCERN OVER THE DEVELOPMENT PROCESS

Process – are there lessons learned from prior projects in the area? References made to EW link, MM, Westconnex.

How can we best respond to this process? How can we actually make an impact?

The West Gate Tunnel is equivalent to an earthquake in this part of the city – many areas will be cut off from future potential development which could take many different forms.

How are the needs of future communities considered in this process?

STREETSCAPE IMPACTS

Where would replacement tree planting go? What about landscape maintenance?

Pylons north of Diamond Road and north of Footscray Road, how will this work?

Height of the elevated road section? This is unclear.

Lack of enhancement of Moonee Ponds Creek. No guarantee about the new open space - subject to land owner approval.

NOISE ABATEMENT

How far do you need to live away from the road before a noise barrier or other treatment is applied?

Why are there no sound barriers for identified renewal areas?

PUBLIC TRANSPORT

Why are they not investing money to increase mode choice of other transport options, like public transport rather than car use?

CITY OF MELBOURNE'S ACTIVITY

Is the City of Melbourne coordinating with other councils impacted by the project?

How can City of Melbourne interface with this area in order to acquire the land for a park?

OTHER COMMUNITY IMPACTS

Big concern about opportunity to generate business - the business model for this project seems to be about generating more vehicles to use the roads.

Title of the project – why has this changed?

REPORT PREPARED BY:

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PLEASE NOTE: While every effort has been made to transcribe participants comments accurately a small number have not been included in this summary due to the legibility of the content. Please contact Keith Greaves at Keith@mosaiclab.com.au for any suggested additions.