



The Carlton Residents Association Inc.

A0034345G ABN 87 716 923 898
 P.O.Box 1140 Carlton Vic 3053
carltonresidents@gmail.com
www.carltonresidents.org.au

The Carlton Residents Association Inc.

Submission to East West Link Comprehensive Impact Statement

1.0 Introduction

1.1 Historical background

The Carlton Residents Association (CRA) and its predecessor, The Carlton Association, have been concerned about livability and quality of life matters in Carlton and beyond since the 1960s. This has included extensive involvements with transport issues, with contributions to many State Government and City of Melbourne community reference groups, policy forums, community actions etc. The historical outcomes of these transport policies, over many years, have been the construction of ever more costly and destructive inner-urban roads, to ignore or patch up the public transport system and to compromise parkland and livability. **The \$8 billion East West Link Stage 1 proposal follows this failed transport policy tradition which has continued for the past fifty years.** The Government has admitted Stage 1 is of limited value until the complete Link is constructed to the Outer Ring Road, at substantial additional cost.

It is time for bold new directions where public transport, cycling and walking have dominance. We again call for a broad review of transport policy for Melbourne. The costly, unsustainable and piecemeal approach now proposed by The Linking Melbourne Authority (LMA), to build the East West Link Stage 1, is unacceptable to the Carlton community.

How could \$8 billion be productively spent to upgrade the public transport infrastructure network? Expert commentators suggest Melbourne's entire public transport network infrastructure could be transformed to world class performance with such expenditure, including many rail-road grade separations. Substantial long-term benefits to the community, environment and economy would result.

1.2 East West Link CIS overview

The East West Link proposal from the Linking Melbourne Authority (LMA), now the subject of a Comprehensive Impact Statement (CIS), is the brainchild of the Napthine State Government. The Link was never part of any long-term well-considered transport plan for Melbourne. It came from nowhere to instantly become the State's top priority transport proposal in 2012. The Government decided unilaterally to build the Link; it then required LMA to create documentation which would support that decision. The CIS is the result of this highly politicised planning process which lacks transparency. The ALP and The Greens oppose the Link.

The CIS fails to cite best practice engineering design standards for the Link and ignores the established role of the City of Melbourne in roads and parkland.

The Link is the most costly infrastructure proposal in Victoria's history yet it is being chaotically planned 'on the run'. No business case or credible traffic analyses have been released to support it. A similar road tunnel proposal, the Eddington East West Needs Assessment, which emerged in 2008, was rejected by the community and subsequently deleted from the Government transport policy agenda at that time.

Negative impacts of the costly and controversial East West Link Stage 1 proposal are a major issue for CRA. In our view, the basic philosophy of 'congestion busting' which is driving the Link proposal is mythical and irrelevant to the major transport challenges now facing Melbourne. **It is impossible to remove traffic congestion by building more roads.**

Unlike earlier Melbourne transport plans, there has been no transparent process or public consultations to independently assess the impacts, merits or failings of the East West Link proposal. A myriad of other cost-effective and viable proposals have been identified which could more effectively address Melbourne's urgent transport upgrade needs eg. rail lines to Doncaster, Airport and Rowville, rail network signal upgrades, rail-road grade separations, cross-city rail tunnel etc. Financial benefits are prominently claimed throughout the CIS but cannot be questioned. Tunnel safety appears beyond the scope of the CIS but is important for users. Will additional vent stacks and evacuation shafts further impact surface areas above the tunnel? The above important matters are outside the Evaluation Objectives of the CIS and therefore beyond the scope of consideration in this submission.

The fact that the Panel Report on the CIS will be delivered to the Government in mid-2014, after construction contracts have been signed for the Link, is particularly concerning. It suggests the Report will have minimal influence on Link impact outcomes.

The massive volume of documentation associated with the current 'Reference Project' CIS, even its Summary Report, is difficult and time consuming to comprehend. This stifles debate and discourages submissions to the CIS. Very restricted Evaluation Objectives further constrain comments on the Link proposal. **The CIS confidently assumes the Link will be approved.**

2.0 Response to CIS Evaluation Objectives

2.1 Transport Connectivity

2.1.1 Congestion

Prioritising roads over public transport, as proposed with the East West Link, will negatively impact the liveability and sustainability of Melbourne long into the future. Extensive experience shows that traffic expands to fill the available road space. History confirms it is impossible to remove congestion by building more roads, as claimed by the CIS for the Link. New inner urban road networks have been rejected across the globe in favour of public transport because of this widely researched congestion factor, ignored by the CIS. The Link will entrench car dependency for commuter travel which is around 90% driver-only in peak periods; a more inefficient mode of transport is unimaginable. Congestion will only be reduced by less traffic with most commuters travelling on public transport.

2.1.2 Traffic analysis

The Link proposal critically relies on traffic data generated by questionable computer modelling techniques. This theoretical data is at odds with all previous actual traffic assessments for the northern city corridor area, including long-established VicRoads traffic information. Claims by the CIS that most Eastern Freeway traffic is east-west bound and will be induced to use the proposed Link tunnel are not credible. The 2008 Eddington study reconfirmed extensive earlier analysis from the Northern Central City Corridor Study (2003) that most traffic is North-South not East-West bound. This analysis led to the conclusion that the benefit-cost would be \$0.50 for every \$1.00 invested which made the Eddington tunnel proposal uneconomic. The CIS ignores the implications of these earlier traffic studies.

Very optimistic new traffic figures predicted for the Link by the CIS, with an associated benefit-cost of \$1.40 for every \$1.00 invested, apparently caused dissention within VicRoads senior staff, which led to the resignation of Mr Doug Hartley, Manager, Network Modelling and Analysis, in August 2013. His resignation attracted significant media attention. Mr Hartley revealed that confidential traffic projections which support the Link are based on ‘dodgy’ computer modelling which could not withstand peer review and contradict VicRoads long-term traffic data and analysis. If Mr Hartley’s assertions are correct, the CIS traffic analysis on which the Link is critically based is fraudulent and must be rejected.

2.1.3 Toll impacts

Costly road tolls to service financial aspects of the Link will detract from its value to motorists, and as elsewhere, will lead to toll avoidance and rat-running in local streets. The CIS claims reduced vehicle travel times, unlocking surface road space in Alexandra Pde. etc. and improving connectivity for public transport, walking and cycling, will be benefits from the Link. In light of the evidence, such claims appear fanciful. Under ‘sovereign risk’ considerations, it appears likely the State (taxpayer) will subsidise tolls to ensure Link usage reaches target objectives.

2.2 Land Use

2.2.1 Property acquisition

Impacts of the Link on property, parkland and open space are very troubling. Compulsory acquisition of many homes and businesses, gross loss of amenity and property values for those living near portals and flyovers, vent stack toxic emissions and associated health impacts, a destructive legacy on Royal Park, etc., are all glossed over by the CIS. Already 105 homes and 34 commercial properties have been identified for demolition. The Victorian taxpayer has been required to contribute \$90 million to compensate owners of the EVO apartment building in West Parkville which was approved in good faith by the City of Melbourne and is still under construction. This property will be surrounded by major new unpredicted roads and is indicative of the shambolic planning associated with the Link which the CIS attempts to defend.

Owners and occupiers of many homes not compulsorily acquired in Collingwood, West Parkville, Flemington and elsewhere near the Link, will endure intolerable impacts during construction and long-term from operation of the tollroad. They will likely suffer a major loss of property values and liveability, without compensation.

2.2.2 Royal Park

For Royal Park the Link will be particularly destructive on parkland and sportsgrounds, estimated by City of Melbourne at \$207 million plus 5000 trees (\$17 million), including many mature and historic trees, scheduled for destruction. The CIS claimed area loss for Royal Park is just 1.36ha which includes only the elevated roadway support piers footprint and western portal area. It excludes major overshadowing factors from large elevated roads structures, inaccessible areas within safety barrier fencing, extensive areas given over to open cut roads and sportsgrounds rendered unusable.

The CIS admits the loss of the entire Ross Straw sports field to traditional sporting clubs and recreational use; it requires these activities to permanently relocate elsewhere, yet does not document this impact. Sportsground areas are in scarce supply within inner urban areas which makes relocation of clubs difficult. Active and well patronised sporting clubs face closure at a time when concerns about physical fitness and obesity are widespread. Apartment dwellers depend on public open space for recreation and exercise.

Impacts of potential open-cut road works, of up to 1km across Royal Park, are ignored by the CIS on the basis that one day the road cutting might be covered, which would allow for surface restoration. There is widespread scepticism that covering would ever occur. The actual extent of open cut activities in Royal Park will remain 'commercial in confidence' until after construction contracts are signed and publically released. Costly court action will be the only response available to aggrieved parties.

2.3 Visual Amenity

Information provided by LMA at briefing sessions confirms dramatic visual impacts on amenity in Collinwood, West Parkville, Flemington and Kensington, and along the Moonee Ponds Creek. This includes widely used and greatly valued parkland, sportsgrounds and open space. Flyovers, open-cut roadways, portals, vent stacks, together with high traffic levels, will substantially degrade the visual amenity across a wide area. Impacts on the Zoo, State Netball and Hockey Centre, and Urban Camp are potentially serious.

Public Housing towers adjacent to Debneys Park will face an elevated roadway around 35m from the building façade which will destroy visual amenity for many residents. An adjacent playground and park will be massively impacted. Public Housing tenants deserve reasonable amenity considerations denied them by the CIS.

2.4 Noise and Air Pollution

The CIS confirms the Link will be a major truck route for freight with associated 24 hour noise and air pollution. Substantial noise and toxic air emissions from elevated roadways will probably impact a wide area, most of it in densely occupied inner-urban areas.

Particulate emissions (< 2.5 micron) from diesel trucks are very injurious to health. Tunnel vent stacks will not be filtered to improve air quality, although such technology is readily available. Currently only two vent stacks are identified near the tunnel portals. Presumably additional vent stacks and evacuation shafts are yet to be revealed along the length of the 4.5km tunnel (the

longest in Australia according to LMA) to maintain tunnel air quality and safety for users under conditions of traffic congestion, accidents, fires etc. The surface location of such stacks and shafts are of concern.

The Clifton Hill Primary School is close to a vent stack and elevated roadways; children will likely suffer injurious health impacts from degraded air quality and noise in the area, despite contrary claims in the CIS.

Unless elevated roads are enclosed by effective noise barriers, liveability will be significantly degraded by continuous traffic noise. Noise levels of 50dBA cause 'moderate annoyance'; VicRoads road noise goal is not to exceed 63dBA (20 times); noise levels of up to 70dBA (100 times) are predicted for the Link. It is unclear how excessive noise will be ameliorated. Vague reference is made to 'noise reduction treatments' in the CIS. It is apparent that the 'quiet enjoyment' of property and parkland will be lost for ever, over a wide area.

2.5 Cultural Heritage

Destructive property impacts in Collingwood and Clifton Hill will include demolition of many heritage houses; numerous others will be fatally compromised by nearby flyovers, a vent stack and high traffic levels. Views of the historic Shot Tower on Alexandra Pde. will also be compromised. Areas now identified for demolition or degradation are already under pressure from developers. Architectural heritage is important to protect; it defines the character of an area.

The Link will be the 'final straw' for some older traditional areas which families have enjoyed for generations. Elderly people face the loss of their home of many decades and all that means. The CIS has been heartless in dealings with these people who face moving away from friends, family and their traditional way of life. It is one of the more disgraceful aspects of the rushed Link proposal. Financial compensation does not mitigate these personal impacts and heartbreak as claimed by the CIS.

Connectivity of inner-urban communities is very dependent on walking and cycling to schools, shops, recreation, visiting friends etc. Major new roads and dense truck traffic will destroy this traditional connectivity and liveability. This is likely to be severe during the construction phase.

The CIS is insensitive to the above cultural issues and inadequately addresses them.

2.6 Native Vegetation and Biodiversity

A large swath of native vegetation is scheduled for destruction in Royal Park and nearby areas: loss of 5000 trees, including many mature and historic trees, destruction of important remnant native vegetation in the Upfield rail line corridor, over-shadowing of the invaluable wetlands water recycling area, and reservations and adjacent parkland along the Moonee Ponds Creek. The remediation offered by the CIS comes with no guarantee and will likely prove impossible to economically implement given the extent of impacts identified.

Royal Park is a much valued State asset for native vegetation, biodiversity and fauna habitat. It is not 'free' open space to be destructively developed for road works at the Government's whim. It has been reserved for generations for public enjoyment and as a nature reserve; it must be

respected as such. With rapid population growth, areas such as Royal Park are essential to Melbourne's liveability in the long-term.

3.0 Conclusion

In the view of CRA, the CIS fails to identify, address and document many major negative impacts of the East West Link as outlined above, and as required under the *Major Transport Facilitation Act, 2009*.

The CIS on exhibition is for a 'Reference Project' which may or may not be the outcome. Final design details for the Link are protected by 'Commercial in Confidence' provisions and will be revealed sometime after the signing of construction contracts in April 2014. With new impact revelations being regularly announced by LMA, we are concerned that the worst is yet to come. Revealed impacts on Royal Park and elsewhere are already horrendous. The Government is clear in its intention to proceed with the Link proposal regardless of negative impacts and opposition.

One of the most significant omissions of the CIS is its failure to include 'economic' aspects of the Link in the Evaluation Objectives; such benefits are prominently claimed throughout the documentation. As argued in this submission, costs for the Link are extortionate (financial, personal, livability, environmental etc.) while the benefits are likely to be illusionary. Only by the taxpayer bearing the 'sovereign risk' will it ever proceed because it cannot be demonstrated to be economically viable. Failed similar road tunnel projects in Sydney and Brisbane confirm the serious commercial risks involved without a taxpayer guarantee of financial returns. The Eddington Tunnel proposal failed such assessments; the controversial East West Link proposal similarly deserves to fail.

The Panel process is the only independent opportunity the community has been afforded for input to the Link proposal. LMA 'information sessions' have at best been sham consultations about decisions already taken. There has been no opportunity for meaningful input to influence or scuttle the proposal, or to canvass alternative public transport proposals which might more effectively address Melbourne's transport crisis.

May we urge the Panel to independently and critically review this 'mad' proposal (as it was described by the late Professor Paul Mees, a world renowned transport expert). It is the one and only forum available for such a review and a final hope for the community voice to be heard.

Ian Bird
Convenor, Traffic & Transport Reference Group
Carlton Residents Association