

1. Introduction: WGTP Project goals

Victorian Transport Action Group (VTAG) **acknowledges that the goals** of the proposed West Gate Tunnel Project (WGTP) are to:

1. address the growing congestion needs of the West and remove congestion on the M1
2. provide alternatives to the West Gate Bridge
3. remove 9,300 trucks from local roads
4. improve travel times and provide resilience in the transport system
5. increase transport access and connectivity of the West with the Port of Melbourne, as well as with the north-west, central city and south of the city.

WGTP is thus intended to contribute to the expected growth of the economy and jobs in the decades ahead.

2. Introduction: WGTP has Major Flaws

1. VTAG's argument is that the project will **achieve very few** of these goals.
2. VTAG is concerned that instead of addressing congestion and improving access to the north and central city, the WGTP will **shift congestion from the West to the inner city** and destroy the character and liveability of those areas.
3. VTAG believes the objectives and decision-making principles of **the Victorian Transport Integration Act 2010 (the Act)** are not being met.

3. Introduction: WGTP is not supported by the Transport Integration Act

We believe the *Transport Integration Act 2010* (the Act) is not being fulfilled:

1. **Victoria's Transport Plan** has NOT been prepared and periodically revised.
2. Major projects (inc the WGTP) are being **proposed and assessed without reference to an agreed planning framework** .
3. These **projects cannot be accurately assessed** against the objectives of the Act.
4. **Providing only a road alternative to the West Gate Bridge contradicts the TIA**, as the WGTP is likely to increase reliance on road transport.

4. Introduction: WGTP is Over-scaled

1. The WGTP market-led proposal has been designed as a **mega-road project**.
2. It is **eleven times larger than the original West Gate Distributor** project, now partly completed, as proposed by the Labor Party in its election policy platform in 2014.
3. **Transurban is the main beneficiary** - the design integrates the project with CityLink and **includes an extension of the CityLink concession for over a decade**, without calling for competitive tenders, creating a monopoly.
4. **Members of the public are suspicious** of the motives for the proposed WGTP design due to the absence of a Victorian Transport Plan related to *Plan Melbourne 2017-2050*, *Infrastructure Victoria's 30 year Strategy* or other city shaping planning initiatives

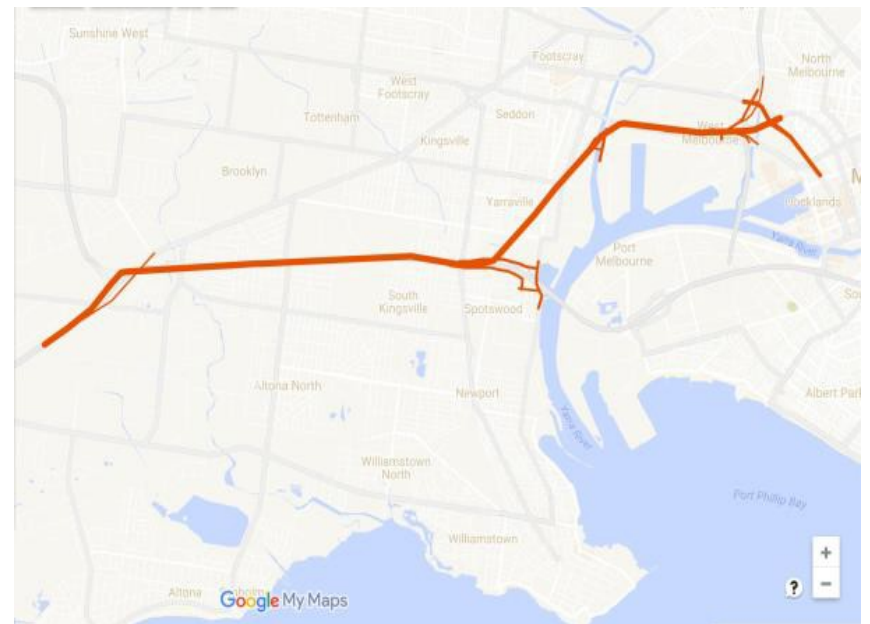
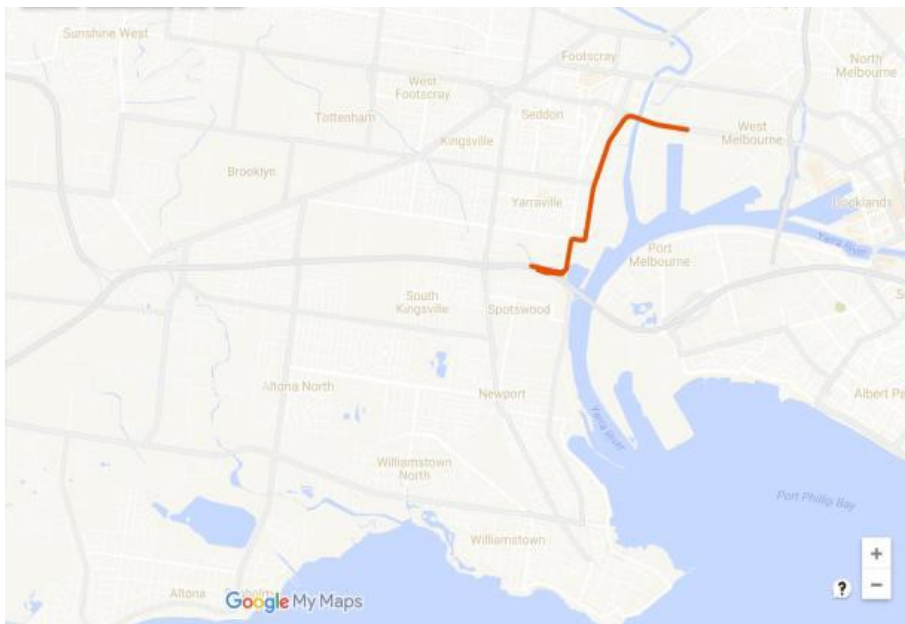
5. Introduction: Revert to the original West Gate Distributor (WGD) Proposal

VTAG recommends reverting to the original project drivers and examine whether the WGTP meets these:

1. **West Gate Distributor (WGD)** Designed to address longstanding freight issues including taking 5,000 trucks per day off the West Gate Bridge
2. **Maribyrnong Truck Action Plan** There was agreement by the people of the West that this plan would work for them.
3. **Freight to Rail** Critical to shift freight traffic from road to rail via **Port Rail Shuttle services** and a **rail corridor connection to Webb Dock** (as called for by the new port owner) to enable 30% of containers to be moved via rail to intermodal terminals at Altona, Somerton and Dandenong South, removing thousands of trucks from inner city roads.

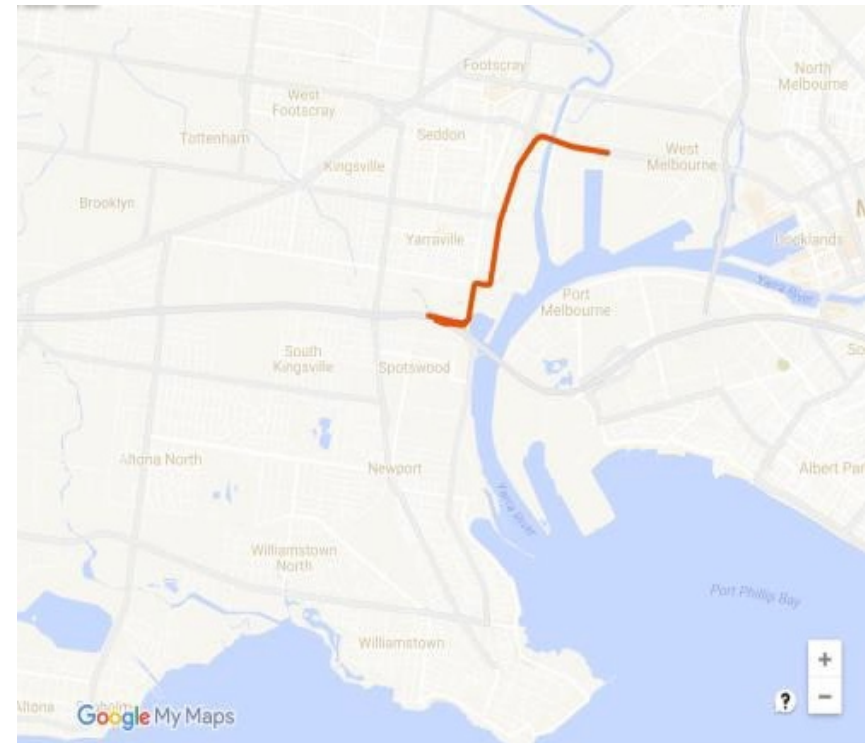
6. The BIG ISSUE: WGD vs WGTP

WGTP is an unnecessary mega-road project that will channel thousands of additional vehicles into the CBD and Melbourne's inner west and north.



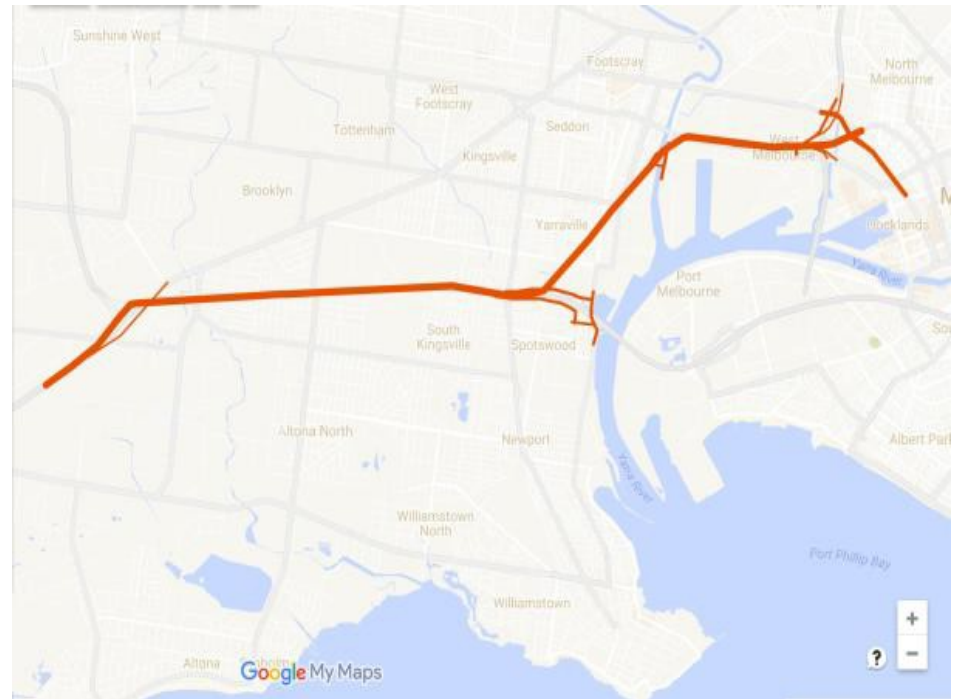
7. The BIG ISSUE: WGD - mandated by the 2014 election, supported by the community & industry

1. In 2014 the Andrew's Government electoral platform proposed alternative works to the East West Link. This included a West Gate Distributor (WGD) designed to address longstanding freight issues, including taking 5000 trucks per day off the West Gate Bridge.
2. The WGD aimed to create a freight road upgrade between the Dynon Port freight precinct and the West Gate Freeway at a cost of \$0.5 Billion. The proposal involved widening Shepherd Bridge over the Maribyrnong River, upgrading Whitehall Street and building ramps to and from West Gate Freeway but funding was only provided for the first part



8. The BIG ISSUE: WGTP – Transurban's opportunity!

1. Shortly after being elected, the Government's focus turned to Transurban's unsolicited Western Distributor bid, a huge \$5.5 Billion project, recently re-named the West Gate Tunnel Project (WGTP).
2. The WGTP has now morphed into a **mega project eleven times the cost of WGD**. It will be city-shaping, for the worse, creating many problems and negative community impacts unless proper governance, planning and objective appraisal processes are adopted to balance the conflicts between public and private interests.



9. The BIG ISSUE: WGTP doesn't meet the transport needs of the West

9 Key reasons for de-scoping the WGTP:

1. Fails to achieve beneficial objectives for Melbourne and Victoria
2. Deliberate over-design to maximize private toll road revenue
3. Denies western suburbs proper public transport services
4. Shifts heavy freight from rail to road potentially increasing road trauma
5. Exacerbates truck issues in the western and inner suburbs
6. Blights homes, land, parkland, trails and waterways
7. Funding is inequitable, with high opportunity costs
8. Flawed planning, consultation and appraisal processes
9. Lacks governance and objectivity

10. VTAG's Recommended changes: Integrated planning!

1. Government could take a **more integrated, multi-modal approach** to the transport problems of the West
2. Planning could be **consistent with the principles of the *Transport Integration Act***
3. Planning could support long term strategic goals of ***Plan Melbourne 2017-2050*** and Melbourne City Council's ***Council Plan 2017-2021***. These both focus on active and public transport modes to enhance the vibrancy of the CBD and facilitate long term urban renewal and extension of the CBD westwards.

11. VTAG's Recommended changes: Reduce road freight – shift to rail

1. A clearer Government policy and action plan to **shift a significant proportion of freight to rail**; Federal and State Governments must develop a co-ordinated rail freight master plan
2. The recently announced intention to seek expressions of interest for the **long overdue Port Rail Shuttle addresses some of these needs is fully endorsed by VTAG.**
 1. The Shuttle service moves containers from the Port of Melbourne to suburban intermodal terminals.
 2. Terminals at Altona, Somerton, and Lyndhurst cover movement to South- West, North and South - East.
 3. Potential to remove 3500 trucks per day off arterial roads in the catchment area of WGTP.
 4. Ultimately, 30% of freight could be carried by rail.

12. VTAG's Recommended changes: Reign-in private sector power

1. **Use resources freed-up by reducing the scope of WGT** (inc. reduction in the proposed extension of the CityLink concession deed) to fund public and active transport projects to provide greater transport choices for people in Melbourne's west.
2. Plan for public transport responses up front as part of major road initiatives, not at the tail end of the project. **WGTP was not planned as a suite with RRL and MM1, it is a stand-alone project** that sets back implementation of much-needed public transport improvements.
3. Review the concession deed to **remove the criminalisation** of the non-payment of failure to pay toll fines, reducing the requirement for Sheriffs Officers to collect fines and relieve congestion in Magistrates Courts to process what should be civil debts.

13. VTAG's Options to mitigate impact of WGTP (de-scoping)

VTAG has particular concerns that the WGTP, rather than addressing congestion and improving access to the north and west of the city, will shift congestion from the West to the inner city and CBD and destroy the character and liveability of those areas.

Options to mitigate the adverse impacts of the WGTP's City Connections :

1. **Eliminate the extension and widening of Wurundjeri Way.**
2. **Protect the integrity of E-Gate** as a gateway to Melbourne from the west.
3. **Eliminate the Dynon Road** connection from the WGTP tunnel.
4. **Apply city access tolls at Dynon Road and Dudley Streets at all times of the day.**
5. Work with Melbourne City Council to **restrict and manage parking** to discourage more vehicles coming to the CBD and inner city.

14. VTAG's Integrated Transport package: 10 projects to support WGD!

A package of congestion-busting public transport projects

1. **MM2: bring forward plans to build the next section of the Melbourne Metro** connecting the south-west to the north-east via Fishermen's Bend, Southern Cross and inner north.
2. **Provide Light Rail connections** between the inner west and Docklands along Dynon and Footscray Roads.
3. **Extend trams from Southern Cross Station** to North Melbourne and the MM1 Arden Station.
4. **Significantly upgrade bus services across the West.**
5. **10 minute inter-peak services on all trunk rail lines.**

15. VTAG's Integrated Transport package: 10 projects to support WGD!

A package of congestion-busting public transport projects (cont.)

6. **Remove level crossings at Werribee, Hoppers Crossing, Laverton, Altona North, Deer Park** and upgrade affected stations.
7. **Extend full metropolitan rail services** to Melton and Bacchus Marsh.
8. **Complete the Federation Trail** and provide a comprehensive network of safe cycling routes across the West.
9. **Provide new Light Rail services to make strategic connections between existing and potential employment clusters in the West.**
10. **Support improved transport choices with land use planning** and incentives to facilitate employment generating uses in the west itself (eg. Health, education, smart technology etc)

16. SUMMARY

The West Gate Tunnel Project:

1. **Should be de-scoped** as it fails to achieve beneficial objectives for Melbourne and Victoria proportionate to its cost and risks attracting traffic and congestion back into the inner city and CBD
2. **Resources should instead be freed-up for the provision of improved PT services and greater transport choices** for western suburbs residents
3. **Wurundjeri Way extension and Dynon Road connection** should be eliminated to protect the liveability of inner Melbourne
4. Develop plans and allocate resources **to shift heavy freight from road to rail.**

17. 9 REASONS ...

... to de-scope the WGTP and replace it with the mandated WGD, integrated with a package of multi-modal projects with benefits beyond the limited project objectives and support the goals of metropolitan and local planning policies.

18. REASON 1: Fails to achieve beneficial objectives for the state

1. **The WGTP does not provide a second Yarra River crossing.** It only crosses the Maribyrnong River that already has 9 crossings. (9 crossings from the Yarra to the Calder Freeway and 2 rail crossings)
2. Moreover, the **Government's enlarged Webb Dock redevelopment, without a rail line connection, will increase West Gate Bridge traffic.** For this reason Melbourne Port is seeking reinforcement of West Gate Bridge for 160 tonne Super B-double mega trucks and to build WestLink, as the current WGTP does not address the requirement to transport large volumes of container traffic.

19. REASON 2: Deliberate over design maximises toll road revenue

1. Transurban's proposed WGTP design creates a mega-road cluster.
2. To link City Link, major arterials and the M80 Western Ring Road, the West Gate Freeway will be widened to 16 lanes plus 4 emergency lanes (at the widest point).
3. The tunnel is to be widened to 6 lanes plus 2 emergency lanes. Emergency lanes can be converted in future to operational lanes as is now happening with City Link Tullamarine Widening in Kensington.
4. The proposed over design of the West Gate Freeway, tunnel lanes and on-off ramps are excessive and will attract additional road traffic to the inner west and north, and to Melbourne CBD
5. Contrary to long-standing policies to reduce road traffic in these areas.
6. This will force Victorians to pay increasing private road tolls for decades.
7. With Transurban's desire to move and toll individual vehicles, there is no efficiency plan that maximises people flows or reduces the number of low-occupancy vehicles on the roads.

20. REASON 3: Denies western suburbs residents proper public transport services

1. The WGTP will divert the capital required for much-needed upgrades and development of train, light rail, tram, smart bus and bus services for the western suburbs for several decades,
2. It will lock in car-dependent futures for over a million people in Melbourne's fastest growing region.
3. There is no plan for a high capacity passenger rail system coordinated with the other modes as required by the Act.
4. The Government has no plan yet for Melbourne Metro 2 (which would serve the south west) and many suggest should follow on immediately from Melbourne Metro 1.

21. REASON 4: Shifts heavy freight from rail to road

1. Transurban has over-engineered the WGTP to ISO1600 Standard to carry monster trucks up to 160 tonnes that are currently illegal in Australian cities.
2. This is to facilitate such trucks rather than trains to shuttle freight between the port and container depots in Altona and Brooklyn.
3. Encouraging monster trucks potentially increases road trauma

22. REASON 5: Exacerbates truck issues in western and inner suburbs

1. Residents in Melbourne's west will find themselves commuting to work on a more congested West Gate Freeway linked to other tollways and freeways, all carrying bigger trucks and loads.
2. Transurban's WGTP proposal for monster road shuttles risks attracting more (port) road cartage contractors into the western suburbs from the north, east and south thereby increasing truck traffic congestion, road trauma, and community health problems particularly due to truck noise and diesel emissions.
3. Additional secondary truck trips will then be needed to double-handle containers from the western suburbs' container yards to end users in the north, east and south.
- 4.
5. **Placarded vehicles**, including heavy freight trucks, hazardous trucks and tankers carrying chemicals and fuels, will be banned from using the tunnels that are an essential component of the WGTP.
6. Instead placarded heavy transport will continue to use public roads close to schools, residences and public places for the next five years as statutory and enforcement authorities are failing to apply existing curfew legislation.
7. Passenger delays on trams and buses will increase on these and related routes due to the induced traffic and additional congestion.
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23. REASON 6: Blights homes, land, parkland, trails and waterways

1. Homes and other sensitive properties are not being protected from 24/7 road traffic noise, pollution, hazards, litter and amenity loss by the WGTP design.
2. An elevated WGTP tollway to be built above the existing Footscray Road will destroy that boulevard, gateway to the western suburbs.
3. Various development sites will be blighted, including E-Gate which will be split and lose its integrity as a result of the building of Wurundjeri Way.

24. REASON 7: Funding is inequitable with high opportunity costs

1. City Link Tollway has proven immensely profitable for Transurban.
2. A further **\$8 billion of tolls are planned to be collected from City Link users for a proposed additional 15 years of the Concession Deed extension** even if City Link users don't use the WGTP. **This revenue should flow to the public purse.**
3. **The toll revenue generated for the WGTP is predicted to be well in excess of the cost of the building it.**
4. **Transurban will be the main beneficiary** of this, not Victorians.
5. **State Government should be funding** the whole project through borrowing via public infrastructure bonds.
6. **The Government has failed to utilise its strong balance sheet** to take advantage of low interest rates to invest in viable infrastructure projects.

25. REASON 8: Flawed planning, consultation & appraisal processes

1. Most transport and land use planning alternatives have simply not been considered.
2. Public participation processes are lacking, so many issues and design alternatives repeatedly raised by citizens have been neglected by the WGTP team.
3. including significant problems like night time noise and carcinogenic ultrafine diesel particulates from trucks.
4. Only selected local micro issues are described on the websites.
5. The Government's terms and conditions of the EES for WGTP are diminished and allow fast-tracking rather than comprehensive and comparative studies.
6. For example no epidemiological study has been mandated.

26. REASON 9: Lacks good governance and objectivity

1. **Public servants are embedded with Transurban, raising conflict of interest concerns.**
2. **The only independent evaluations, that we are aware of, have not been available for public scrutiny** to ensure that Government decisions are made objectively, in accordance with the requirements of State legislation, Plan Melbourne and Federal evaluation guidelines.
3. The **WGTP 'business case' was redacted** by the State, before its release.
4. This raises major **doubts over its assumptions and claimed community and industry benefits.**
5. **Greater transparency by Government is required.**

27. VTAG's conclusion

De-scope the WGTP and replace it with the mandated WGD, integrated with a package of multi-modal projects with benefits beyond the limited project objectives and support the goals of metropolitan and local planning policies.