



11 March 2016

Impact Assessment Unit (Planning)
Department of Environment, Land, Water and Planning
GPO Box 2392
Melbourne Vic 3001

Ask for: Bill Millard
Phone: 9932 1096
Our Ref: A2332039

Dear Sir/Madam,

Draft Scoping Requirements for the Western Distributor Project

Thank you for the opportunity to respond to the *Draft Scoping Requirements for the Western Distributor Project*. Council appreciates the opportunity to provide input into this important project.

Hobsons Bay City Council recognises the importance of an efficient freight sector to the economy of the western region of Melbourne and its role in the success of businesses across Victoria. It is within this context that Council would like to provide the attached comments in relation to the *Draft Scoping Requirements*.

A key outcome for Council is the removal of freight from local streets and the efficient transport of freight to and from the Port of Melbourne and industrial precincts. However, Council is concerned about the health impacts of increased car dependency; therefore an integrated response to transport planning is required. The role of the Western Distributor must be considered as a part of transport network that prioritises sustainability and embeds the principle of an efficient public transport system for commuter trips into the CBD; and enables active transport outcomes through the further development of the Kororoit Creek Trail, the Federation Trail, commuter cycling along Hyde Street and pedestrian access across the West Gate Freeway.

If you would like to discuss this submission further please contact Bill Millard, Director Strategic Development on 9932 1096 or email bmillard@hobsonsbay.vic.gov.au.

Yours Sincerely,

Chris Eddy
Chief Executive Officer



Hobsons Bay City Council response to the draft Scoping Requirements for the Western Distributor Project

Specific issues that Council would like addressed in the EES Scoping Requirements include:

The Project and Setting

Hobsons Bay City Council asks that consideration be given for the following projects to be undertaken in collaboration with the proposed works to maximise outcomes for residents and businesses:

- a direct exit ramp and on ramp to Grieve Parade to the West Gate Freeway to ensure freight traffic is directed onto the West Gate Bridge
- extending the Kororoit Creek trail under the bridge on the West Gate Freeway
- provision of bicycle and pedestrian access along Millers Road at the intersection with the West Gate Freeway
- rebuilding two pedestrian bridges across the Freeway to ensure they are DDA compliant
- extending the Federation trail so that it links two strategic redevelopment sites, particularly Precinct 15 (the Don's site) in Hobsons Bay and the Bradmill site in Maribyrnong and that it enables direct access to the CBD

Council requests that the following issues be addressed in the Draft EES Scoping Requirements:

Climate Change

Council supports the Victorian Government's commitment to climate change through its Climate Change Act 2010 and the Climate Change Adaptation Plan. Council recognises that there are a number of risks associated with the potential impacts of climate change. It supports a best practice approach to the management of and adaptation to climate risks and particularly the impact on individuals, businesses and communities. The omission of climate change within the scoping requirements requires further consideration and Council believes that it should be addressed in Section 4 – Matters to be addressed in the EES as well as part of the specific environmental effects. The Climate Change Act 2010 requires decision makers to take climate change into account when making specified decisions. The Western Distributor affects local government and the delivery of services to our community. Council believes there are a number of decision making and risk management principles within the Climate Change Act 2010 that apply to the project and should be addressed as part of the EES. In particular, a decision should integrate the competing long-term and short-term



environmental, economic, health and other social considerations relating to climate change to ensure that:

- (a) all relevant issues relating to climate change associated with the decision will be taken into consideration during the decision making process
- (b) there is a proper examination of all the issues which are relevant to climate change
- (c) any measures adopted as a result of the decision are cost effective and in proportion to the problems relating to climate change that are relevant to the decision (Climate Change Act 2010, Division 3, Guiding Principles).

It is also important to assess the effects of climate change risk and uncertainty on infrastructure and the interaction between socio-economic systems and the management of extreme events such as floods, heat stress and storm surges that cause flooding, particularly on and around Hyde Street. Consideration is required as to the relevant legal and regulatory frameworks, institutional arrangements and regulatory models that will be most effective in meeting the challenge of climate change adaptation on all aspects of the project.

Transport capacity and connectivity

Council believes the project would benefit from a disaggregation of the transport capacity and connectivity objective into integrated transport planning and traffic management. As the emphasis of integrated transport is on a whole of network approach it will enable consideration of Melbourne's overall transport network. This includes the role of public transport as the preferred method of travel over private car use into the CBD; the potential role of rail for the Port of Melbourne; the potential of the Western Distributor to integrate with the different modes of transport; and its impacts on land use within the region, including benefits to the industrial sector across the western region and the long term consequences for communities. The traffic management component could evaluate the Western Distributors effectiveness for the efficient movement of freight through the industrial sectors of the inner west, its role in servicing the Port of Melbourne and specific issues of safety and traffic flow.

Specific issues to be addressed include:

- Council has identified benefits that accrue from the Western Distributor such as directing freight away from local streets, including Francis Street and Somerville Road. However, the redirection of freight from these local streets may not provide a network wide response, as freight from the Brooklyn industrial estate will be redirected down Millers Road to access the West Gate Freeway or seek alternative routes to avoid tolls. This will have significant consequences for



Hydrology and water quality

Given the impact on water quality and the environment both during construction and throughout the lifecycle of the project, consideration is required on run-off from the tunnel and the roads onto the bay taking into consideration the effects of flooding and sea level rise as a consequence of climate change.

Social, business, land use and public safety and infrastructure

Whilst the investigation of the EES is to be consistent with a systems approach and a risk-base approach, it is important to consider the role of soft systems thinking as it is highly effective in considering the complexity of an issue, particularly one where there are divergent views. Council argues that the inclusion of an analysis of the human system increases the potential to debate the issues and explore alternatives as well as consider the impacts on the community.

Landscape, visual and recreational values

There is the potential for significant adverse impacts on Donald McLean Reserve and Stony Creek Park either through, the location of tunnel ventilation shafts; their use during the construction phase and disruption to sporting clubs. There will also be significant increases in noise pollution as a result of an increase in lanes on the West Gate Freeway, proximity to the tunnel entrance/exit, and off/on ramps to Hyde Street. Council asks that Donald McLean Reserve and Stony Creek Park be considered as distinct key issues and that the effects of increased noise, pollution and vibration levels on open spaces be investigated to determine an appropriate response.



residents in Brooklyn and their capacity to enter Millers Road or for local traffic heading south along Millers Road

- redevelopment of the West Gate Freeway from four to six lanes provides an opportunity for an emergency lane and Council requests consideration of this to ensure the safety of all road users
- travel behaviour is impacted by the rate and positioning of tolls, given their potential to provide a congestion charge for motorists entering the city as well as their role in providing inducements to heavy vehicle traffic entering the Port of Melbourne. Consideration is required on the impact of tolls across the network as well as on placard loads and local trucks servicing the industrial estates along the Geelong to Werribee corridor and the industrial estates in Brooklyn, Altona, Spotswood, Footscray and Yarraville
- the effect of heavy vehicle traffic on the local road network both during the construction phase and following the building of on/off ramps to Hyde Street requires consideration of the condition of the pavement both before and after construction including the ongoing maintenance
- the *Transport Integration Act 2010* provides an important input into the effective integration of land use and transport planning to improve accessibility and transport efficiency. Its aim is to maximise access to residences, employment, markets, services and recreation whilst considering how transport decisions are made to the current and future impact on land use

Amenity and environmental quality

The removal of trees from the central nature strip and the road verge has an impact on both the aesthetic qualities of the road as a gateway to Melbourne and on the role of trees in improving localised air quality and as a response to reducing the heat island effect. Consideration of significant offsets for residents living adjacent to the West Gate Freeway and an investigation on alternatives is required in collaboration with Council.

The quality of sound barriers along the West Gate Freeway is variable and this has significant impacts on local neighbourhood amenity. High quality sound barriers with strong visual amenity are required to protect community wellbeing and enhance the role of the West Gate Freeway as a gateway to Melbourne.